

Core Strategy

Additional
Consultation
Responses

June 2010



Exeter City Council

Exeter Local Development Framework

RESULTS OF ADDITIONAL PUBLIC CONSULTATION ON THE CORE STRATEGY: OCTOBER – NOVEMBER 2009

1 BACKGROUND

- 1.1 The need for an additional consultation, as part of the preparation of the Core Strategy, was suggested by the Government Office for the South West as a way of dealing with new matters that had arisen since the Preferred Options consultation in 2006. In particular, these were concerned with the potential increase in housing numbers arising from the Regional Spatial Strategy (RSS) Proposed Changes in July 2008, revised Government guidance allowing Councils to allocate sites in their Core Strategies considered central to the achievement of a strategy and advice on the infrastructure needed to supplement the amount of development proposed for the area.
- 1.2 The Council had objected to the revised housing provision, 15000 dwellings, contained in the RSS Proposed Changes. However, at the time of this consultation, the Government Office for the South West had not proceeded with adopting the RSS because, following a legal challenge to the East of England RSS, it had decided to carry out further sustainability appraisal work on its housing figures. Because of the uncertainty that this created, this consultation was carried out on the basis that it would explain how the 12000 dwellings target, as outlined in the RSS Panel Report (December 2007), may be achieved but would also consider the implications of the proposed additional 3000 dwellings. Since then, the new Coalition Government has announced that it intends to abolish the RSS during the next Parliamentary session and return decision-making on housing and planning to local authorities. In this context, the Council decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings over the Plan period.
- 1.3 A copy of the consultation report was placed on the Council's website and made available for inspection in the Civic Centre's Customer Service Centre. A press release was also issued to local media drawing attention to the consultation. 547 individuals, organisations and public bodies were contacted either by e-mail or letter and informed about the consultation. The public consultation ran from 1 October 2009 to 19 November 2009.

2 RESULTS OF THE PUBLIC CONSULTATION

- 2.1 The Council received 61 representations. These were from a range of sources including members of the public, local businesses, developers, landowners, public bodies and campaign organisations. A summary of the representations, and the Council's responses, is attached to this report.

Housing Target

- 2.2 Few respondents dealt directly with the matter of whether the target should be 12000 or 15000 dwellings. Bovis Homes expressed the view that Exeter had the capacity to accommodate 15000 houses while the Topsham Society supported the Council in opposing the 15000 allocation. The Campaign to Protect Rural England also considered the RSS provisions should be challenged. Twenty four other respondents were more concerned about the impact of either target on the character of the City, on the road network, particularly west of the Exe, and local facilities and services. Most of these

views were expressed in letters from members of the public. However, they also included responses from English Heritage, RSPB and the Highways Agency, all of which indicated some strong reservations about the impact of the proposed levels of growth on, respectively, the historic environment, important wildlife habitats and the strategic road network.

Spatial Approach

- 2.3 In conducting this consultation, the Council was keen to obtain views on its spatial approach, the key component of the Core Strategy. The responses were generally positive. PCL Planning described the approach as “prudent and pragmatic”; David Mezzetti stated that it is “clearly laid out and thought through given the constraints that the process places upon all councils.” A number of public bodies and developers welcomed the three strategic allocations. Overall, there was a relative lack of criticism of the Council’s approach in most of the other representations received.

Land at Topsham

- 2.4 A particular focus for comment related to the suggestions in the consultation report on how the RSS requirement for 15000 dwellings might be met. Eight respondents expressed particular concern about the potential loss of the green wedge separating Topsham from Exeter. Most shared the Council’s view on the importance of retaining this strategic gap; a number were concerned that development in this area might result in the loss of valued local sporting facilities such as Topsham Rugby Club.
- 2.5 English Heritage expressed some surprise that despite recognising the importance of the green wedge, the Council nevertheless identified the land for possible development. English Heritage stated that it understood the problems that had arisen as a result of the RSS allocation. However, it concluded that “Topsham is one of Devon’s best preserved and most interesting little towns ... and its setting is important.”
- 2.6 Because the Council is now proceeding with its Core Strategy on the basis of providing 12000 dwellings, it no longer needs to consider bringing forward this land for development. It should be noted that the Council had always been reluctant to identify this land for development and had only done so because of the limited options available in accommodating 15000 dwellings. Given that other options were considered even less desirable, the green wedge between Topsham and Exeter was considered the ‘least worst’ option. Because the Council recognises the strategic importance of this green wedge, the Local Plan landscape designation in this area is retained.

Windfalls

- 2.7 Some criticism was received on the inclusion of an allowance for windfalls to meet the 15000 housing target. PCL Planning considered the figures extremely optimistic. Meanwhile, the Government Office for the South West advised that the Core Strategy may be considered unsound if it included this level of windfalls. It suggested additional sites may need to be identified. Because the Council is now proceeding with its Core Strategy on the basis of providing 12000 dwellings, it no longer needs to rely on windfalls to meet its housing allocation. Nonetheless, given past trends, it is reasonable to expect a steady supply of dwellings to be delivered through windfall sites over the Plan period.

Responses to Consultation Questions

- 2.8 The consultation document posed three questions. The first was ‘are there other more sustainable and appropriate sites that should be considered for development?’ No significant sites were identified. A small number of representations challenged the conclusions of the recently published SHLAA assessment on a particular site; one further site was put forward within the Alphington Valley Park for two dwellings. Two replies suggested the housing should be located outside of the City boundaries.
- 2.9 The second question was ‘are there other issues that are important in successfully developing the strategic sites (Newcourt, Monkerton/Hill Barton and Alphington)?’ Generally, the representations focussed on raising the problems that would arise from the proposed growth rather than addressing the possible solutions to accommodate it successfully. Furthermore, the overwhelming majority of points raised were concerned with matters discussed in the consultation document. It is acknowledged that the need to keep the document brief and focussed meant it did not address air quality or noise. However, these are considered important matters and are covered in the Core Strategy. In summary, no new matters arose from the consultation, which have not received the Council’s attention.
- 2.10 The third and final question was ‘are there other key infrastructure requirements that should be identified in the Core Strategy?’ Again, the respondents highlighted matters that were contained in the consultation document, particularly transport, schools, green infrastructure, community facilities and flood risk. All of these are addressed in the Core Strategy. No new key infrastructure requirements were identified.

Densities

- 2.11 Five representations expressed concerns that the densities proposed for the strategic allocations are too high. This was partly owing to a view that high densities may be out of character with the surrounding area or that people do not wish to live in cramped conditions. However, it also reflected a view, expressed by Hill Barton Consortium and Eagle One Homes, that the market now wants family housing rather than flats and that this will make it difficult to achieve densities of 50 dwellings per hectare. Whilst acknowledging the issues that were raised, it is important to emphasise that higher densities are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. Good layout and design will be required to ensure high densities do not harm the quality of the living environment.

3 CONCLUSION

- 3.1 Overall, the consultation responses gave rise to relatively little criticism of the Council’s general spatial approach. Furthermore, no new strategic sites were identified. Nonetheless, the representations did raise strong concerns about the general impact of growth on the City. These concerns are recognised by the Council and it will be important to ensure that the timely delivery of infrastructure contributes towards mitigating these impacts.

- 3.2 The unease expressed regarding the loss of the green wedge between Topsham and Exeter, and the reliance on windfalls, has played a part in the Council's decision to move forward with a target of 12000 dwellings over the Plan period. The new Government's announcement that it intends to abolish the RSS and the Council's own evidence of housing capacity have also been key factors.
- 3.3 The matter of densities has been considered carefully – particularly during masterplanning work for the strategic allocations. The Council acknowledges it is important to ensure that any new development provides a high quality urban environment where people will want to live. However, it is also important to achieve densities that can support sustainable transport and low carbon infrastructure. The Council will want to be satisfied that the right balance has been struck when determining planning applications for residential development in the future.

Core Strategy Additional Consultation: Summary of representations and responses

	Representation	Response	Respondent
1.1	Strutt and Parker supports the Newcourt Strategic Allocation. It is working on bringing forward for residential development two parcels of land around Newcourt House.	Noted.	James Gibbs, Strutt and Parker
1.2	An existing track between Newcourt House and Newcourt Road provides a good opportunity to create a footpath and cycle link between Topsham and Newcourt.	The track has been identified by the consultants working on the Newcourt Masterplan as a potential route linking the site to Topsham.	
2.1	In view of the scale of development under consideration, the final Regional Spatial Strategy (RSS) allocation for housing is not a concern.	Noted.	Martyn Dunn, South West Water
2.2	South West Water's forthcoming business plans will factor in the development proposals in terms of providing sufficient potable water and adequate sewage treatment capacity.	Noted.	
3.1	Exeter already suffers serious overloading of existing facilities. Any expansion of the city will lead to more congestion on the roads, further pollution of the city centre, overloading of hospital and other essential services, unemployment and gradual destruction of a place forming part of the holiday area of the south-west.	A key role of the Local Planning Authority is to consider the wider implications of development. The scale of proposed growth has led the Government to designate the Exeter area as a New Growth Point. Its Board comprises East Devon District Council (EDDC), Devon County Council (DCC), Exeter City Council (ECC) and a range of key partners whose remit is to help deliver growth in the Exeter sub region. Various studies, including the Exeter and East Devon Infrastructure Study and the Green Infrastructure Strategy, have been carried out by the Growth Point to assess how the proposed growth may be accommodated. DCC is updating the Local Transport Plan and preparing Access Strategies for growth to the east of the city. These documents identify the measures required to accommodate the growth and mitigate	D J L Palmer

		its impact. Included is a High Quality Public Transport (HQPT) scheme linking Cranbrook to Exeter City Centre and Alphington. A key aim of the spatial strategy is to provide a significant increase in jobs as well as houses.	
3.2	The RSS will not consider the working and indigenous population but will impose targets to accommodate the mass of people coming into this country and those wishing to re-locate in the hope of escaping the conditions that have developed in their localities.	Immigration to, and migration within, the UK partly explains the reason for the proposed housing but there are other factors including people living longer and an expanding university.	
3.3	The people of Exeter do not wish to see any expansion. What is the point of consultation if the Council is to be dictated to from above?	The consultation seeks to give the public an opportunity to comment on the Council's Spatial Strategy.	
3.4	The road system cannot be adapted to cope with up to 15000 more dwellings. Public transport is not the answer to all the problems that will be created.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme forms one important element in the strategy.	
4.1	The proposed development in Pinhoe Quarry may cause increased traffic along Harrington Lane / Beacon Lane. Owing to a lack of all year round useable bridleways, horse owners are forced to use these roads which are getting more dangerous every day. Thought should be given to providing more bridleways or shared use paths in the area to separate horses from other road users.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. On the broader point, DCC is responsible for the bridleways network in Exeter. The Growth Point's Green Infrastructure Strategy provides the framework for improving the bridleway network in the area.	Olivia Down

5.1	There is a factual inaccuracy in the document. Pinhoe Quarry is referred to as 'previously developed'. The definition of 'previously developed land' in Annex B of PPS3 excludes 'land that has been developed for minerals extraction ... where provision for restoration has been made through development control procedures'.	Agreed. However, the Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course.	Andy Hill, Devon County Council
6.1	No comments to make on the document.	Noted.	R Bust, The Coal Authority
7.1	Disapproves of the plan to develop the green area between Topsham and the M5. The development of the Royal Naval Stores Depot will already increase demand on the infrastructure of Topsham and Countess Wear – a further 400 homes on the final green area between Topsham and Exeter is madness.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	Nigel Deasey
7.2	It is incredible taxpayer's money is being wasted complying with the last dying demands of a redundant and soon to be replaced government knowing full well that a new government will review the RSS and apply a more common sense approach to housing needs.	At any given time, the Council must work within the Government's policy framework. However, the new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	
8.1	The Bonfire Field in Topsham, in addition to forming part of the green area separating Topsham from Exeter, is also used by Topsham Rugby Football Club and Topsham St. James Cricket Club. Both clubs provide important and valued facilities and should be preserved.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	A A Harding
9.1	The Strategic Housing Land Availability Assessment (SHLAA) identifies land north of the West of England School (Topsham Road) that could contribute to housing requirements during the plan period. The proposals should take account of the availability of this site.	The Council's SHLAA plays an important role in identifying land in the city that could be suitable for future housing development. When considering this site, the SHLAA concluded around half of the site is suitable, available and achievable for housing. Further consideration will be given to this site when the Council produces its Site Allocations DPD.	Richard Challinor on behalf of ADP&E Farmers

9.2	It is proposed that the urban extensions at Newcourt, Monkerton / Hill Barton and Alphington will have housing densities of at least 50 dwellings per hectare. This is too high for areas outside the current confines of the urban area. It will detract from the quality of the developments by adversely affecting living conditions, including giving rise to unusually high vehicular traffic in residential areas.	Higher densities are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. It is anticipated there would be higher densities at nodes / community centres and lower densities abutting existing development. Good layout and design will be required to ensure high densities do not harm the quality of the living environment.	
10.1	What will the Council do to improve the road networks around Exeter to support existing and additional housing?	In accordance with the County Council Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth.	Emma Andrews
10.2	How does the Council justify the additional pollution added to the city as a result of this housing growth?	It is assumed the question relates to air pollution. The Council has prepared a local Air Quality Strategy outlining measures it will take to protect and improve air quality. Generally, air quality in Exeter is very good but there is a need to tackle emissions generated by vehicles along the City's busiest roads. This has resulted in the designation of an Air Quality Management Area where levels of nitrogen dioxide are unlikely to meet air quality objectives. Measures to reduce pollution by cutting congestion on the main routes into the City have been identified in the Air Quality Action Plan. This, together with DCC's Local Transport Plan, will bring forward measures to tackle pollution. Proposals in the Core Strategy are linked closely to the Air Quality Strategy and Action Plan.	
10.3	Can empty homes be used instead of building new houses?	The Council's housing team is working to identify empty homes in the city and bring them back into use. However, the number of empty homes in Exeter is small when compared to the growth levels set out in the Core Strategy	

10.4	Will the houses be of sufficient quality or cheap, badly built affordable housing ghettos having young people who don't really care about an area?	National, regional and local planning policies all emphasise the need for high quality design and affordable housing. Any new dwellings will also need to be built in accordance with building regulations. To achieve mixed communities, the Council will aim to ensure affordable housing units are in small clusters around a development.	
10.5	The document states that land between Exeter and Topsham would be brought forward as a last resort. Why as a last resort? Why are we so desperate to provide additional housing?	Because the Council is now proceeding with its Core Strategy on the basis of the 12000 dwellings target, it no longer needs to consider bringing forward this land for development to meet its housing allocation. It should be noted that the Council has always been reluctant to identify this land for development and had only done so because of the limited options available in accommodating 15000 dwellings. Given that other options were considered even less desirable, the green wedge between Topsham and Exeter was considered the 'least worst' option.	
10.6	Can Exeter provide jobs for its existing population?	Whilst the recession is clearly having an effect on Exeter, the long-term outlook for the local economy is generally thought to be good. The Regional Development Agency (RDA) and the Government Office for the South West (GOSW) consider that over the Plan period, Exeter will play a major role in raising productivity and delivering sustainable growth in the region by building on existing economic strength and investing in the skills and knowledge base. Research for the Regional Assembly indicates overall employment in the Exeter area is expected to grow by up to 28,500 jobs over the next twenty years. In recent years, the growth in jobs has not been matched by housing supply and this has led to an increase in commuting. Currently over 40% of jobs are taken by residents living outside the city. The Core Strategy's housing provision seeks to address this imbalance.	

11.1	In respect of land between Topsham and Exeter, the map shown in the Express and Echo (21 October 2009) appears to show the wrong site as it includes Topsham Rugby Club, the University Playing Field and a number of houses. Most of the land available adjoins the Royal Naval Depot on the other side of the M5.	The maps printed in the Express and Echo were not provided by the Council and contained numerous errors. Land west of the M5 has been identified within the Newcourt Strategic Allocation. The land between the M5 and Topsham contains pockets that could accommodate housing. However, because the Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings, it no longer needs to consider bringing forward this land for development.	Mrs E Norton
12.1	The RSS proposed dwelling provisions are not valid and should be challenged. The figures are based on the discredited method of 'predict and provide' and are founded on boom years of easy credit which are unlikely to return, at least in the early years of the plan period.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	J S Rowe, Campaign to Protect Rural England
12.2	Monkerton/Hill Barton is included but not the area bounded by Pinn Lane/Westclyst and the motorway or that to the north and north west of Parkside Road. Although outside the City boundary, these areas would form a natural extension to the Pinhoe/Monkerton area and could provide a large number of dwellings – thus avoiding development on the green wedge separating Topsham from Exeter.	Because the Council is now proceeding with its Core Strategy on the basis of the 12000 dwellings target, it no longer needs to consider bringing forward for development the land separating Topsham from Exeter. Notwithstanding this, the 12000 dwellings will be provided within the City Council's boundaries. Significant housing growth is also proposed both to the east and the south-west of Exeter.	
12.3	The proposals at Alphington appear to include only the area presently within the City boundary but a natural extension of this area up to the A379 would be acceptable. This could provide a large number of dwellings.	The proposals at Alphington are part of a wider strategic allocation that includes land with Teignbridge District Council's boundaries. The Council is working with Teignbridge District Council to ensure a co-ordinated approach is taken here.	

12.4	The intended protection of the hills to the north and north west of the city is desirable but perhaps exaggerated. For example, there might be scope for development beyond Pendragon Road and Chancellors Way, which would relieve pressure elsewhere.	There is relatively poor infrastructure to the north and north-west of the City. The most sustainable options for housing growth are existing urban areas and land to the east and south-west of the city. The Green Infrastructure Strategy stresses the importance of retaining the distinctive ridgelines around Exeter.	
12.5	The provision of employment land to the south of the A379 is unnecessary given the County Council's Skypark and Science Park proposals. There has been a tendency in the past to for the City to over allocate employment land to the detriment of alternative uses, particularly housing.	The provision in the Core Strategy takes into account the conclusions of the Exeter Employment Study and the Employment Land Review.	
12.6	Concern is raised over another new community of 4000 to the east of the City. This might well result in continuous development between Exeter and Cranbrook.	The point is noted but essentially such developments would fall outside the City Council's boundaries and are not the subject of the Core Strategy. However, the Council is working with EDDC and the Growth Point team on the matter of housing delivery on land east of Exeter as any developments in the area will clearly have significant infrastructure implications for the City.	
12.7	Good urban design and a distinctive environment will not be achieved if left to the developers. The Royal Naval Stores Depot and Kings Heath developments are both characterised by dreadful mediocrity and dreariness and materials of little quality. Planners need to make much more positive statements in planning documents and requirements in planning approvals.	The Council is working on an SPD for residential developments, which will set out the need for high standards in layout and design. Masterplans have been produced for the Monkerton/Hill Barton and Newcourt strategic allocations, which will be important in bringing forward high quality development. The Core Strategy contains a policy relating to design and local distinctiveness.	
13.1	The Constabulary is working on a scheme to replace its Heavitree Road facility, which includes a Strategic Policing Hub and Criminal Justice Centre to be sited at Middlemoor. In parallel, the wider viability of part of the remaining land is being assessed. Land could be zoned for employment / residential.	Noted.	Andy Morris, Devon and Cornwall Constabulary

14.1	Is the Exeter economy likely to be able to sustain an expansion of 15000 dwellings? Are there enough jobs?	The text has been revised and now states that 12000 dwellings will be provided over the Plan period. However, significant housing growth is also proposed both to the east and the south-west of Exeter. Exeter has experienced strong economic growth in recent years and a consequent increase in the number of jobs. This has not been matched by housing supply and this has led to an increase in commuting. Currently over 40% of jobs are taken by residents living outside the city. The housing provision seeks to address this imbalance.	A G York, Murray French (Exeter) Ltd
14.2	There are no doubt initiatives to develop more jobs by taking them from other parts of the country. However, that brings householders with more house-buying power with resultant difficulties for locals.	It is acknowledged some jobs may come to Exeter as a result of relocation and, where employees' average earnings are higher than the local average, this may result in some upward pressure on house prices. However, it is important to stress jobs will also come from local relocations and expansion, which will benefit the local economy.	
14.3	The road system in the Alphington area has not kept pace with the past increase in dwellings. Road improvements and park and ride services have not helped much. There are not enough crossings over the Exe. Without a new one, or some other radical change, it is unlikely the existing roads through Alphington and Marsh Barton will cope with the urban extension.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme, which will operate between Alphington and the City Centre, forms one important part of the strategy.	
14.4	Amenities need to be provided in Alphington otherwise it will become a dormitory suburb.	Noted. A Masterplan for the south-west Exeter urban extension is currently being produced by consultants. Community facilities, such as the provision of a local shopping centre, are being considered as part of this process.	

15.1	Exeter Golf and Country Club generally supports the Newcourt Strategic Allocation but wishes to clarify information contained in the supporting text of the Strategic Housing Land Availability Assessment (SHLAA). Land known as the 'practice ground' could come forward for residential development by 2012 rather than 2018.	Noted. The SHLAA will be reviewed in 2010.	Cathy Francis, King Sturge on behalf of Exeter Golf and Country Club
15.2	It is understood the RSS requirement for 12 gypsy/traveller pitches will be met at Monkerton/Hill Barton and so the reference to site provision in Newcourt should be deleted.	The RSS, which the new Government proposes to abolish in the next parliamentary session, had set out the level of provision for both permanent and transit gypsy and traveller sites. However, the evidence base was largely produced locally by the Devon-Wide Gypsy and Traveller Housing Needs Assessment. Therefore, there remains an imperative to meet the needs of this minority group and to avoid unauthorised encampments. There is a requirement for the provision of 25 permanent and 5 transit gypsy and traveller pitches over the plan period. Provision is therefore required on both strategic allocations.	
16.1	Land adjacent to the A30 and A377 is suitable for a strategic mixed use allocation. It could cater for park and ride, retail, leisure, hotel, residential and recreational space. It is a highly sustainable location – situated on two important transport nodes. The site is suitable, available and achievable. The Council considered the site in its Strategic Housing Land Availability Assessment (SHLAA). It concluded that wholly residential development was inappropriate owing to inadequate infrastructure and concerns over flood risk. A mixed use development with some residential should be considered for this site. An evidence base, including a flood risk assessment, is currently being prepared for the site.	This land has already been considered through the Council's SHLAA process. It was promoted for mixed use development when initially presented. The Council concluded the land is unsuitable for housing on flood risk grounds and on strategic planning grounds (i.e. it is outside the two strategic locations for growth – the existing urban area and land to the east and south of the city). The Council has concerns about the size of the plot and its ability to accommodate a range of other uses. However, it raises no objections to a park and ride facility on part of the site.	Alex Graves, Genesis Town Planning

17.1	No Sustainability Appraisal /Habitat Regulations Assessment has been produced to accompany the Core Strategy consultation document. Proposals for strategic growth at Exeter, including Alphington, ought to make specific reference to potential impact on international sites and the need for appropriate mitigation.	The purpose of the document is to consult on some specific matters not brought forward at Preferred Options stage. A Sustainability Appraisal was published with the Preferred Options paper in October 2006. It is an iterative process. A revised Sustainability Appraisal will accompany the Submission Core Strategy. A Habitat Regulations Assessment has been carried out by consultants (WSP) and will also accompany the Submission Core Strategy. Natural England has been closely involved in this work.	Steve Robinson, Teignbridge District Council
17.2	The Proposed Changes RSS identifies provision of 500 dwellings in the Exeter part of 'Area of Search 4C'. This document proposes 600. It may be premature to increase figures in advance of master planning and capacity work for the area.	Agreed. The Council has concluded that the Core Strategy will refer to 500 dwellings.	
17.3	Affordable housing provision should be agreed for 'Area of Search 4C' in its entirety and not divided by different local planning authority areas.	Whilst there may be differences in the percentage of affordable housing sought from schemes, the Council agrees that a common approach should be reached between Teignbridge District Council and Exeter City Council on this matter.	
17.4	It is assumed the new Park and Ride facility proposed at the A30/A377 junction would be located outside the Alphington Strategic Allocation. For clarity, it may be beneficial to refer to its specific location. Acknowledging traffic congestion is evident beyond the City Centre at peak periods is worthwhile.	The proposed Park and Ride site is outside the Strategic Allocation. In Paragraphs 6.4-6.7 of the Consultation Document, the Council acknowledges the problems of congestion both in and around the City Centre at peak periods and states transport infrastructure will be a priority if the levels of growth envisaged are to be accommodated successfully.	
17.5	Reference to potential use of renewable energy supplies would be appropriate.	The Core Strategy provides guidance on decentralised, renewable and low carbon energy, supported by further detail in the Masterplans for the strategic allocations. A Supplementary Planning Document (SPD) on Decentralised Energy and Sustainable Construction is to be prepared.	

18.1	On infrastructure, no mention is made of social or community facilities – including meeting places for religious or other groups seeking to find suitable premises. It may be that the Social and Community Infrastructure Study, which is currently underway, is considering this matter. Appropriate policies should be included in the Core Strategy to ensure provision for the religious and spiritual needs of the community.	The Exeter and East Devon Infrastructure Study provides guidance on the need for facilities such as community halls, which could be used by a range of groups for various purposes. The Strategic Allocations section of the Consultation Document referred to the need to provide community facilities. This is reflected in the Core Strategy and further detail will be included in the Masterplans for the specific areas.	J Fisher, Jehovah's Witnesses South West Region
19.1	It would be a shame to lose the farm land at Monkerton/Hill Barton as there is so little left in Exeter.	Given the limited options available, it is not possible to avoid building on farm land and to provide the housing growth required over the Plan period.	Jeff Rayment
19.2	It is hoped Exeter can keep its charm and character but it is feared that development around Monkerton/Hill Barton would chip away at it and move Exeter ever closer to a large housing estate. It would be preferable to build outside of Exeter (i.e. at Cranbrook).	Given the limited options available, it is not possible to avoid building on the land at Monkerton/Hill Barton and to provide the housing growth required over the Plan period. Significant housing growth is also proposed both to the east and the south-west of Exeter.	
19.3	Issues around leisure time and quality of life are not addressed. Shops, pubs, restaurants, cinemas and other facilities will be required if thousands of houses are to be built as there are insufficient facilities now.	In Section 5 of the Consultation Document, the Council recognised the need for additional facilities. The Exeter and East Devon Infrastructure Study and the Monkerton/Hill Barton Masterplan provide guidance on the facilities that are required.	
20.1	No comments provided except to say that, for the purposes of clarity, page numbers should be inserted into the document.	Noted.	R Freeman, The Theatres Trust
21.1	Western Power Distribution (WPD) has a number of strategic electricity distribution circuits, both underground and overhead, in some of the areas, particularly Newcourt and Alphington, considered for development. WPD would expect developers to pay for any diversions of the circuits. As a general rule, WPD would seek to retain the position of circuits operating at 132000 volts, 66000 volts and in some cases 33000 volts.	Noted. Normally developers would resolve these matters directly with WPD rather than through the planning system.	Alex Wilson, Fulfords on behalf of Western Power Distribution

21.2	WPD does not have any restriction on the type of development possible in proximity to its strategic overhead lines but planning guidance and layouts should consider uses compatible with the retention of strategic overhead lines - such as parking, estate roads, commercial uses or open spaces – within their immediate proximity.	Noted.	
21.3	WPD should be consulted on detail at an early stage.	Noted.	
22.1	In response to the proposals at Alphington, a new secondary school will be required for the wider West Exe area. This should take pupils from Exwick rather than bussing them across the city to schools that will need to cover growth in the east of the city. At least two primary schools will be required. A new purpose built dental surgery and medical practice, a new Youth Club and a further Children’s Centre will also be required.	It is accepted that additional facilities and services will need to be provided as a result of the proposed growth (paragraphs 5.19 to 5.25 of the consultation document). The Exeter and East Devon Infrastructure Study provides broad guidance and the Masterplan for the South West Exeter urban extension will provide further detail. DCC, as education authority, will feed into this process.	Cllr Robert Hannaford, City Councillor St Thomas and County Councillor Exwick and St Thomas.
22.2	Any new housing estates should have a high proportion of affordable housing, preferably over 35% if possible.	The Core Strategy states that at least 35% of new housing, on sites capable of accommodating three or more dwellings, should be affordable.	
22.3	All new housing should have decent sized and fully equipped children’s play areas.	Requirements will be in line with the Council’s Public Open Space SPD and the Residential Design SPD.	
22.4	Community facilities / infrastructure should be completed alongside the housing to avoid developers being chased for completion after building work has finished.	Agreed. The Core Strategy stresses the importance of timely provision of infrastructure.	
23.1	It is essential that a green wedge separates Topsham from Exeter. However, given the RSS requirements for 15000 houses in Exeter by 2026, the Society reluctantly agrees with the Council that it may be necessary to build in this area towards the end of the plan period.	Noted. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	

23.2	The Topsham Society urges the Council to resist the imposition of the 15000 target on the grounds that the current economic downturn has caused a 2 to 3 year hiatus in the 15 year programme, equivalent to a reduction of nearly 3000 houses.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	
23.3	The release of land forming any part of the green wedge between Exeter and Topsham should be phased towards the end of the plan period and brought forward only if monitoring of completions and land availability elsewhere in the City dictates that the release of this land is essential.	Noted. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	
23.4	A green wedge of a minimum width of 150m should be maintained alongside Topsham Road / Exeter Road. The land alongside this road shall be reserved for sports/recreational and open space activities.	Noted. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	
23.5	A full traffic and car parking impact study should be carried out to assess the affects on Topsham. Developer contributions should be sought for the necessary infrastructure measures which are identified.	Noted. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	
24.1	Refurbishment and redevelopment of the Grecian Quarter will be of general benefit to the city. It is hoped the additional dwellings will take into account the need for additional purpose-built student accommodation in the city in order to reduce the need for further HMOs.	One of the main purposes of this document is to outline where the Council has identified sites capable of contributing towards the housing provision of 12000 dwellings. This figure includes student housing. Further consideration of this matter will be informed by detailed work to be carried out on the Grecian Quarter in due course.	Sue Temple, Thornton West Resident's Association

24.2	<p>The introduction of the one-way system in Paris Street has diverted traffic and caused congestion in Blackall Road, Pennsylvania Road, York Road and Summerland Street. Development of the Grecian Quarter would lead to more traffic. Paris Street should revert to two-way traffic.</p> <p>Sidwell Street could be re-created as a proper full-time market of mainly small, local quality retailers - a pedestrian area, with sitting areas and trees, to increase ambience and safety. Buses could be removed from the High Street and re-routed in order to encourage more use of bicycles.</p>	<p>Consideration of these matters will be informed by detailed work to be carried out on the Grecian Quarter in due course.</p>	
25.1	<p>Part of 3.6 hectares of land off Pocombe Hill – west of Exonia Park and north of Prospect House - could be developed for 2 eco-friendly dwellings using an existing access.</p>	<p>Such proposals can be assessed through the Council's Strategic Housing Land Availability Assessment. This is reviewed annually. It should be noted, however, that the site is within a valley park and is therefore unlikely to be considered suitable for residential development.</p>	<p>Mr A Palmer, Pinnacle Design and Project Management Ltd on behalf of Mr D Jolly</p>
26.1	<p>The field behind Pulpit Walk rises quite steeply. Any houses close to the boundary of existing properties would be visually overwhelming and result in loss of light.</p>	<p>This would depend on the layout and design of a specific proposal. Amenity would be considered, when a planning application has been submitted.</p>	<p>Peter Phillips, resident of Pulpit Walk</p>
26.2	<p>If this development goes ahead, Alphington will lose its suburban village character. If the Teignbridge development is inevitable, or even likely, there should be a green belt around Alphington.</p>	<p>Given the limited amount of available land within the boundary, the Council has few options when identifying land to accommodate 12000 dwellings. Consultants working on the South West of Exeter Masterplan, that includes land to the south of Alphington within Teignbridge, are considering various options for the provision of green space in the area, including a country park. The Council also intends to protect the distinctive Knowle Hill from development.</p>	

26.3	Increased development will add to congestion, and pollution, on the roads in Alphington. Significant alleviation measures are needed before development proceeds.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme, which will operate between Alphington and the City Centre, forms one important element in the strategy. Proposals in the Core Strategy are also linked closely to, and complementary with, the Council's Air Quality Strategy and Air Quality Action Plan.	
26.4	Any changes to existing estate roads, such as the creation of a through route from an existing cul-de-sac, would have a serious impact on residents, particularly young children.	This would depend on the layout and design of a proposal. Such issues would be considered once a planning application is submitted.	
26.5	The proposals in the Teignbridge area could have a significant impact on Alphington but local people will not have any representation. How much influence does Exeter have over Teignbridge in such matters?	Residents in Exeter will have the opportunity to comment on Teignbridge District Council's South West of Exeter Area Action Plan in due course. ECC is working closely with Teignbridge on the preparation of the Masterplan, which will form the basis for the proposals in the Area Action Plan.	
27.1	Cornerstone has 3 houses in Water Lane which it plans to redevelop within the next 5 years to provide 12 or so affordable rented properties. Is there any merit in identifying the site at this stage?	It is suggested this proposal is considered through the normal Development Management process.	Anne Seaborne, Cornerstone Housing
28.1	The details of housing to be provided through strategic allocations are welcome.	Noted.	Jamie Sullivan, Tetlow King on behalf of South West RRSL Planning Consortium
28.2	Exeter City Council needs to consider the need and provision of affordable housing in the city. The large need for affordable housing cannot possibly be met wholly on brownfield sites. Substantial areas of greenfield land must be allocated to enable development of affordable housing and in particular housing for families.	The Council has identified a number of areas of greenfield land, chiefly the strategic allocations, which are intended to come forward for mixed development, including residential and employment. The Core Strategy requires 35% of the dwellings, on sites capable of providing 3 or more dwellings, to be affordable.	

28.3	Exempting affordable housing from making full contributions will encourage Registered Social Landlords (RSLs) to develop affordable housing schemes in the City. It will also demonstrate to the Homes and Communities Agency that they can deliver good value for money in Exeter, thus attracting more public subsidy to the area.	The previous Government indicated that RSLs would be granted full exemptions from the Community Infrastructure Levy (CIL) for most forms of affordable housing. The Council has not as yet made any decisions on whether to adopt CIL. Furthermore, it is not clear whether the new Government will seek to implement alternative legislation. In the meantime, developer contributions will be sought in line with the Planning Obligations SPD. Section 4.9 explains how the Council will respond to problems that may arise regarding the viability of a scheme.	
29.1	The approach of the City Council is prudent and pragmatic in seeking to deal with the proposed changes published by the Secretary of State in July 2008. Regardless of the final outcome of the RSS, it is necessary to ensure adequate land can be found in order to secure the City's potential.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings and employment land provision of 60 hectares. Sufficient land has been identified to accommodate this growth.	David Lobban, PCL Planning
29.2	It is not clear from Paragraph 2.7 that 500 units are to be provided within the City and a further 2000 dwellings south west of the City within Teignbridge.	Reference to the 500 dwellings at Alphington would have reduced the clarity of the paragraph. The Alphington figure is included elsewhere in the report and is set out clearly in the Core Strategy.	
29.3	The main purpose of a SHLAA is to examine critically the deliverability of potential residential sites. This work has not been published but it is understood it does not conform strictly to Government guidance. It is believed an optimistic view has been taken regarding some constraints to delivery owing to limited facts being available to the assessment panel. The deliverable yield and timing of sites such as Water Lane, The Grecian Quarter and Ibstock Brickworks is questioned.	The SHLAA was published in October 2009. The Council disputes that it has not conformed to Government guidance when carrying out this assessment.	

29.4	<p>Given experience elsewhere in the City, it is a concern as to whether or not the issue of flood risk can be addressed in the Water Lane area and whether 800 dwellings can be delivered. It is questioned whether retention of employment use might be more appropriate.</p>	<p>The Water Lane area has been identified as a regeneration area - in accordance with guidance from the Environment Agency. The Council has already carried out flood risk work for its Core Strategy. A Strategic Flood Risk Assessment (Level 1) has been completed and published. Work on a Level 2 Assessment, which includes consideration of the Water Lane area, is ongoing. Any planning application for this area will also need to be accompanied by a Flood Risk Assessment. On deliverability, part of the area was put forward during the SHLAA process and will be available for housing during the Plan period. In respect of the wider area, the Council considers comprehensive regeneration could provide further housing capacity. Some employment uses would almost certainly remain. However, The Exeter Employment Land Review 2009 concludes the area is not ideal for employment uses owing to poor accessibility. The regeneration of this area will be considered in more detail through a masterplan.</p>	
29.5	<p>Proposals for the Grecian Quarter are supported. This is an ideal opportunity to introduce further City Centre residential accommodation. However, there should be caution with regard to achievable timescales for delivery.</p>	<p>The comments are noted. The Council has assessed this area in the SHLAA and considers delivery is achievable over the Plan period.</p>	
29.6	<p>The housing numbers (Paragraph 3.5) are suspected to be on the optimistic side and that greater allowance should be made for non delivery and difficulties such as flood risk.</p>	<p>Paragraph 3.5 provides figures showing how the Council can provide 12000 dwellings by 2026. The figures have been established with reference to a significant evidence base. The Council has already carried out flood risk work. A Strategic Flood Risk Assessment (Level 1) has been completed and published. Work on a level 2 Assessment is ongoing. The annual monitoring report will allow the Council to assess progress and set out what actions are needed if targets are not being met.</p>	

29.7	The figure of 2000 windfalls from the period 2019 onwards is optimistic in the extreme. This represents 13% of the total housing to be provided in the last seven years of the Plan period. This is extremely unlikely and in fact windfalls are likely to tail off from historic rates during the final part of the Plan period as the Council's regeneration objectives are secured and affordable housing 'tax rates' start to bite into existing/alternative use values. If the RSS is confirmed at the higher figure then further land will be required.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. It does not need to rely on windfalls to achieve this target. Nonetheless, given past trends, it is reasonable to expect a steady supply of dwellings to be delivered through windfall sites over the Plan period.	
29.8	Middlemoor is probably a good opportunity – but is it genuinely available?	The Head of Buildings and Estates at Devon and Cornwall Constabulary has indicated by letter that the site is likely to be available.	
29.9	We are not convinced on the importance of retaining the green wedge between Exeter and Topsham and believe that separation could be secured by a more positive planning approach to the location of open space relative to any housing development in the area.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development. The area will be protected and will retain its existing landscape designation.	
29.10	A greater level of clarity on the precise requirements for infrastructure, and the method of funding, will be required in order to ensure delivery. It is important to ensure any demands for infrastructure that are made on the private sector are reasonable and in accordance with Government policy on this matter (Circular 05/2005).	The Council agrees with these points. More detail on meeting Core Strategy policy requirements will be provided through an Infrastructure Delivery SPD.	

29.11	At Monkerton / Hill Barton, average housing densities per hectare seem ambitious bearing in mind the context of suburban development that is already located either within, or in close proximity to, the site, its sloping topography and the lack of market demand for flats here.	Higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. Good layout and design will be required to ensure high densities do not harm the quality of the living environment. Work on the Masterplan indicates the Council can achieve its open space standards and an average density of 50 dwellings per hectare in this area. This should ensure the Monkerton/Hill Barton area forms a sustainable urban extension to Exeter.	
30.1	The Agency recognises the uncertainty surrounding the adoption of the RSS, and on this basis, supports the approach Exeter has adopted in identifying a phased release of housing beyond the RSS Panel Report figure of 12000 dwellings.	The Council has not adopted this approach. Furthermore, the new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	Ian Parsons, Highways Agency
30.2	There is no broad objective relating to reducing the need to travel, particularly by car, and promoting sustainable modes of transport. This should be a strategic objective. Without this, growth will be constrained by the limited additional capacity that can be achieved on the highway networks. The Agency supports the emphasis the Council places on infrastructure delivery, mitigating and adapting to climate change and reducing carbon emissions. Fundamental to the success of development to the east and south west of the city will be the early provision of sustainable transport infrastructure.	The importance of sustainable modes of transport forms an integral part of the Core Strategy's key objectives and policies.	

30.3	<p>The Agency supports use of brownfield sites within the urban area, where there are existing transport nodes. The impact of major proposals on the Strategic Road Network (SRN) will need to be assessed fully in accordance with the Department for Transport (DfT) Guidance on Transport Assessments. Major developments in these areas that exceed the thresholds set out in DfT Guidance on Travel Plans should also be accompanied by robust Travel Plans.</p>	Noted.	
30.4	<p>The Agency notes proposals to use employment land at Water Lane for residential purposes. It would have some concerns if this created an imbalance of residential development to employment provision and therefore increased out-commuting. A carefully balanced mixed use scheme would need to be pursued.</p>	<p>The Council envisages a comprehensive regeneration of Water Lane would result in a mixed use scheme. The regeneration of this area will be considered through a Masterplan.</p>	
30.5	<p>The Council should consult the Agency at the earliest opportunity if major windfall schemes are submitted – preferably during pre-application discussions. Similarly, the Agency has concerns about sites at Topsham and Pinhoe Quarry in relation to potential impact on Junctions 29 and 30 of the M5, especially when considered in conjunction with the growth proposals to the east of Exeter. The Agency would expect to be consulted at an early stage if these areas are required for development.</p>	<p>The Council will continue to work closely with the Highways Agency. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. Similarly, the land between Topsham and Exeter no longer needs to be brought forward for development. The area will be protected and will retain its existing landscape designation.</p>	

30.6	Regarding the three urban extensions, full and robust assessments will be required of the potential impacts of development on the SRN. Proposals should seek to promote self-containment and reduce the need to travel, especially by car. The Agency supports measures such as the inclusion of a new rail halt at Newcourt. In addition to any physical mitigation measures to the SRN, the promotion of sustainable transport links should be a key objective in the delivery of these sites.	The Council agrees with these points and will work with the Highways Agency to identify and deliver the necessary transport infrastructure.	
30.7	The Agency supports the provision of higher densities along public transport corridors.	Noted.	
30.8	The Agency is concerned about directing employment development towards the M5 and the A379 and providing good access on to the SRN. It would not encourage this approach unless it can be demonstrated that such provision will not have a negative impact on the safe and efficient operation of the SRN.	The Council considers employment sites should have good access and be located in areas where similar uses are established. The Council has taken a balanced approach in identifying sites in a range of locations around Exeter for employment uses.	
30.9	The Agency supports improving the public transport system to reduce congestion - but to date it has received limited details about a potential park and ride scheme east of the M5. Further work is needed to identify the impact on the A30 and M5. The Agency supports the HQPT scheme and enhancements to the local rail network, in addition to improvement schemes at M5 junctions 29 and 30.	Noted. DCC would oversee the development of any additional park and ride schemes and, working with East Devon District Council, is considering the needs for the area through its Local Transport Plan and Access Strategies (for east of the city).	
31.1	The bus/coach station should be retained unless a more suitable city centre location can be found. Ideally, this should be within walking distance of the city's train stations to create a transport hub.	A bus station will be incorporated into any regeneration.	K M Lyons

31.2	Sidwell Street could be widened at the western end and developed as the city's long needed permanent open air market. Other retail should meet the demand for specialist shops to add individuality and identity. Ideally, the street would be pedestrianised. The Grecian Quarter needs more extensive tree planting. Buses should be removed from the High Street. Cycling should be encouraged. Paris Street should be re-opened to two way traffic.	Consideration of these matters will be informed by detailed work on the Grecian Quarter to be carried out in due course.	
31.3	With plans for substantial growth in student numbers, a proportion of off-campus accommodation should be placed within the identified areas to reduce need for more HMOs.	Consideration of these matters will be informed by detailed work on the Grecian Quarter to be carried out in due course.	
31.4	Relying on car travel to out of town superstores is fast becoming undesirable. All residential areas of the city must provide good quality local food shops selling a higher proportion of local produce.	One of the key objectives of the Core Strategy is to reduce reliance on car travel in the City. Whilst the Local Planning Authority can seek to secure smaller shop units that are attractive to independent retailers, it cannot insist such stores are reserved for businesses selling local produce.	
31.5	The plan does not mention provision of allotments.	The Core Strategy seeks to make provision for allotments. Masterplans for the strategic allocations will consider the matter in the further detail.	
32.1	Increased housing in the east will inevitably lead to increased traffic. It is suggested before any major developments are commenced the bottlenecks caused by the railway bridges on the Exmouth branch are removed and the roads widened to include pavements and lanes for cyclists.	The Core Strategy and supporting strategies and studies, including DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, provide guidance on the infrastructure required to accommodate the proposed growth. Some projects are already moving forward including the provision of a bridge over the M5 for cyclists and pedestrians.	Naome Glanville, Senior Council for Devon
32.2	Access to Water Lane needs to be improved before substantial further development occurs.	Regeneration of Water Lane would require consideration of how to improve access. The regeneration of this area will be considered through a Masterplan.	

32.3	Concern is raised over average densities of 50 dwellings per hectare – this suggests some parts of the development will have higher densities and involve high rise flats.	Higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. Good layout and design will be required to ensure high densities do not harm the quality of the living environment.	
32.4	Firmer statements should be made to ensure land is set aside for open spaces, play areas, green corridors, shops, services and community facilities.	The Core Strategy, and the Masterplans for the urban extensions, provide guidance on these matters. Current Local Plan policies and Supplementary Planning Documents (SPDs) also cover some of these issues.	
32.5	No mention is made of parking provision associated with the housing. If garages are built, they must be wide enough to accommodate modern cars; otherwise there will on-street parking adding to the congestion.	This is a matter that will need to be addressed during the Development Management process. The Council is currently producing a Residential Design Guide SPD, which will set out preferred approaches on how to integrate parking provision into a new development.	
32.6	Redevelopment of the Grecian Quarter requires careful consideration – particularly possible relocation of the bus station. Account must be taken of the increase of bus density to cope with modal shift and new routes to serve new developments.	These matters will be considered in detail during the masterplanning for the bus/coach station area. A bus station will be incorporated into any regeneration of the area.	
32.7	The interchange with city buses for commuters arriving at Central Station should be improved. The strategic importance of the route to the RD&E Hospital for people from the rural areas must also be recognised. Many patients for the hospital do not have cars and hence must use the buses and need a convenient interchange.	These points are noted. The Council will continue to work with DCC on ways to improve the City's transport system.	

32.8	If there is to be substantial increase of traffic from East Devon and Teignbridge, it is time for a northern by-pass to take through traffic for Crediton away from the city centre.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth.	
33.1	The decision to follow the level of housing provision contained in the RSS Proposed Changes is welcome. The Secretary of State identified that the increased level of provision would secure better alignment between job creation and housing development. The economic and social need for the housing is entirely consistent with the vision for the City set out in Preferred Options paper.	The Council has not adopted this approach. The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	Alan Soldat, Barton Willmore on behalf of the Hill Barton Consortium and Eagle One Homes
33.2	The decision to extend the life of the Core Strategy to 2026 is also welcome.	Noted.	
33.3	The inclusion of the strategic allocation at Monkerton/Hill Barton is welcomed. Development here represents an opportunity to create a sustainable new community which is well located for access to public transport and to some of the City's largest employment areas and can help to create a compact urban structure for the City.	Noted.	
33.4	There is a move away from higher density forms of development (i.e. flats) towards family housing. This is what the market wants. Family housing is the most appropriate form of development for large parts of this site. This could make an average of 50 dwellings per hectare hard to achieve.	The Exeter and Torbay Housing Market Assessment (HMA) identifies a continuing need for a mix of housing including a substantial amount of 1 / 2 bedroom accommodation. In addition, higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. Good layout and design will be required to ensure high densities do not harm the quality of the living environment.	

33.5	The Growth Point published a Green Infrastructure Study in 2009. This can be incorporated successfully into a masterplan for the Monkerton area. Similarly, a public transport strategy can be delivered, which will improve transport infrastructure for the area. The use of SUDS and renewable or low carbon energy sources are supported.	Noted.	
34.1	The Regional Planning Board opposes the housing numbers proposed in the Proposed Changes for Exeter HMA and recommends that the numbers, their distribution and phasing from the draft RSS (dRSS) are substituted.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	Neal Whitehead, South West Councils
34.2	Any new areas of search proposed which are in accord with the strategic locational principles of the dRSS should be phased to the end of the period to allow further local assessments of deliverability to be considered and be tested in the partial review process. If these were to be reflected in the final RSS then the Core Strategy would need to reflect that as well.	Noted. The annual monitoring process allows the Council to assess progress and set out what action needs to be taken if targets are not being met.	
35.1	The former brickworks and Pinhoe Quarry sites at Harrington Lane should not be considered as two different sites but covered by one development brief to ensure a phased development led by the provision of necessary and appropriate infrastructure.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. Regardless of whether the site does or does not come forward with the brickworks, the Council will take a comprehensive approach to infrastructure in the area.	Mrs E J Escott
35.2	The Quarry should be reinstated as fields to preserve and enhance the setting of St. Michael and All Angels church and to provide areas for wildlife and recreation.	The permission for the quarry requires restoration of the quarry void by importation of inert waste. However, the owners are considering other options including residential development.	

35.3	Neither site should be developed until the impact of the Chancel Lane development can be assessed in relation to traffic movements along Church Hill, Harrington Lane, Venny Bridge and Summer Lane. All these roads have single passing points, weight limits and height restrictions and are not capable of facilitating a sustainable residential development of these sites or of taking construction traffic from both sites at the same time.	Developers would be required to submit a transport assessment with any major application for housing development. The Council would consult the Local Highway Authority (DCC) on any such application. If mitigation measures are required, planning obligations may be requested from the developer. The route for construction traffic would need to be worked out by the developer given the restrictions in the area.	
35.4	In the quarry area, significant infrastructure works will be required to deal with water run-off. The quarry site may be more suitable being used as a covered reservoir.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. The Council recognises that significant infrastructure works would be required to develop the Quarry.	
35.5	As a peripheral city location, a lower density scheme, largely made up of family housing with defensible gardens, should be provided.	Higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. The challenge for developers is to design a scheme at high density without creating a cramped environment.	

35.6	Pinhoe Primary School should be provided with additional money to facilitate, amongst other things, additional classrooms and playground/sports equipment. Funding should also be made available to improve the public play area adjacent to America Hall. In addition, money should be sought from developers to improve parking at Pinhoe school and America Hall. Improvements to highway safety would also be desirable. Pinhoe Library should be replaced by a purpose built building providing additional community facilities such as an internet café.	The Growth Point's Infrastructure Study identifies community infrastructure requirements in the Pinhoe area. These matters will be considered in further detail in the Monkerton/Hill Barton Masterplan. The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. In these circumstances, contributions would be sought for any additional requirements arising from such development.	
35.7	In the Quarry area, traffic calming measures should be required along with improvements to highway drainage.	These matters relate to management and maintenance of the highway and therefore require the attention of DCC as Local Highway Authority.	
35.8	Maps should accompany the document to make clear the location of sites with exact boundaries.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. Nonetheless, if any applications for residential development on this site are submitted in future, the site location map and accompanying drawings will make clear the location of the boundaries.	
36.1	Advice is given on the management of the historic environment. It has been prepared having regard to national policy, guidance and plan making advice.	The advice is noted.	Ross Simmonds, English

36.2	The proposed allocation at Alphington is adjacent to a scheduled monument. There is no mention in the plan of the effects of such a proposal on the setting. ECC should work with Teignbridge District Council to ensure that in the search area beyond Exeter's boundaries the impact of development on historic assets and environments is considered properly.	The scheduled monument is to the south of the Markham Lane ridge, outside Exeter's boundary. However, the Council recognises the importance of historic assets and environments and will continue to work closely with Teignbridge District Council in ensuring the impact of development is considered properly. An archaeology assessment has been commissioned to help inform the Masterplan for the south-west urban extension.	Heritage
36.3	The document recognises the importance of maintaining the green wedge at Topsham but despite this the location is still considered, even if it is as a last resort. Topsham is one of Devon's best preserved and most interesting little towns and its setting is important. What evidence has been collated to understand the impacts of growth upon this locally distinctive environment?	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	
37.1	It is doubtful whether the Grecian Quarter could provide 300 dwellings.	The Grecian Quarter has been assessed through the SHLAA and the Council considers that 300 dwellings is an achievable figure for the area.	John Pragnall
37.2	The 'green wedge' between Exeter and Topsham should not be lost to housing.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to consider bringing forward this land for development.	
37.3	Are the housing capacity figures gross before the infrastructure implied land requirements are assessed?	In calculating the figures, account has been taken of probable infrastructure on a site.	
37.4	The consultation does not provide any analysis on the character and value of farm land within the strategic allocations.	Noted. Given the limited options available, it is not possible to avoid building on higher grade agricultural land and to provide the housing growth required over the Plan period.	
37.5	Is it wise for the Health Authority to dispose of land and buildings at this time given projected population growth?	It is assumed the Health Authority would have made an informed decision when selling off land at Gladstone Road.	

37.6	The extension of the plan period to 2026 is regrettable. Climate change, energy shortfall, increased world population and food security will cause all Governments to review their position on future planning, economic and environmental strategies.	PPS12 requires authorities to adopt Core Strategies with a minimum 15 years plan period. However, it is acknowledged that the Core Strategy may need to be reviewed before the end of the plan period.	
38.1	Aggregate Industries owns Bishop Court Quarry. It supports the findings of the Council's SHLAA, which identified the site for future potential housing development. However, it is proposed the wording is changed so that there is no reference to a replacement quarry facility being provided.	The Council understands that DCC, as the Minerals and Waste Local Authority, would object to the quarry's development for non-mineral purposes unless a scheme included a suitable replacement facility in the Exeter area. The Council will conduct a review of the SHLAA but could not amend its SHLAA conclusion without revised advice from DCC. Further discussions with the Minerals Authority are being pursued.	Cathy Francis, King Sturge on behalf of Aggregate Industries UK Limited
39.1	The fields between Dawlish Road and Chudleigh Road take an extreme amount of water and act as a flood defence to houses in the area. Development of the fields would be against environmental logic. They also form part of the green circle that surrounds much of Exeter.	Given the limited amount of available land within the boundary, the Council has few options when identifying land to accommodate 12000 dwellings. Any development on these fields will need to be designed to incorporate Sustainable Urban Drainage (SUDS) in order to minimise the risk of surface water flooding.	Peter Rowe
39.2	The fields also constitute prime agricultural land. Sustainability, as mentioned in the document, should be around preserving land for growing food, not development. Fields are a vital part of living in Devon – this does not seem to be recognised.	Developing land in this area will result in a sustainable urban extension to Exeter. The wider landscape surrounding Exeter will be retained in agricultural use. Proposals for the urban extensions will incorporate green open space and allotment provision.	
39.3	More houses will lead to more pollution. The proposal of building more environmentally friendly houses only works if old houses are taken down.	The Building Regulations are being tightened so that by 2016 all new houses will be zero carbon. The Government and the Council are also looking at ways to improve the environmental performance of the existing housing stock.	

39.4	600 houses would approximate to 900 more cars. Roads in and out of Alphington are already gridlocked at peak times. There is also the matter of safety for pedestrians and cyclists.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme, which will operate between Alphington and the City Centre, forms one important part of the strategy.	
40.1	It is important to ensure sufficient land is identified that is both available and deliverable.	The Council agrees with this statement.	Mr G W Keay, Director of Pinhoe Quarry
40.2	The total number of dwellings identified in Paragraph 3.5 (12365) is possibly on the high side. Some contingent allowance needs to be made for non-delivery and potential difficulties on land availability.	Paragraph 3.5 of the document provides figures showing how the Council can provide 12000 dwellings over the Plan period. The constituent figures have been informed by the SHLAA and are considered achievable. The annual monitoring process allows the Council to assess progress and set out what action needs to be taken if targets are not being met.	
40.3	The owner of Pinhoe Quarry intended to start operating a long term landfill in late 2010. However, the site could be made available for housing development as an alternative to landfill restoration. DCC has been asked to withdraw its holding objection to non-mineral development as there is no requirement to protect a mineral reserve that is of no further economic use. It is considered wholly inappropriate to wait for 2 years (and probably a lot longer) for the progression of the Minerals Core Strategy to decide on the future of the quarry.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. Recently, Devon County Council, as the Minerals and Waste Authority, has advised Exeter City Council that it does not have a minerals objection to the site being developed.	

41.1	<p>Exeter College challenges the Council's view, as stated in the SHLAA, that land at the College's Wear Barton site is inappropriate for residential development given it would result in the loss of a playing field. The Council's audit of outdoor recreational facilities (June 2005) concludes the city is well provided in terms of formal sports facilities. The Council has permitted the release of other sports facilities in the City. The release of part of Wear Barton would not harm the sporting facilities which serve the local area. King George V Playing Fields and facilities on Exeter Road are nearby. The capital realised from release of this land would be reinvested back into sporting provision within the city and enhance sporting facilities at Exeter College. The loss of the sports pitches would be outweighed by the benefits of improving and expanding the recreational facilities at Exeter College.</p>	<p>This land has already been considered through the Council's SHLAA process. The Council concluded the land is unsuitable for housing on Green Infrastructure grounds because it would result in the loss of a playing field. In accordance with Local Plan guidance, the loss of the playing field would only be considered if there were firm proposals for replacement provision of equivalent community benefit.</p>	<p>Cathy Francis, King Sturge on behalf of Exeter College</p>
42.1	<p>The additional houses in Alphington would add to traffic on already congested roads and increase levels of pollution resulting in poorer air quality. It could also have a detrimental impact on businesses in the Marsh Barton area as cars will use the industrial estate to try to bypass the traffic. It is unlikely the park and ride at Ide would reduce levels of traffic as people in Alphington would have to drive approximately an extra 0.5 miles to reach the facility whilst the city centre is only 1.5 miles away.</p>	<p>In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme, which will operate between Alphington and the City Centre, forms one important part of the strategy.</p>	<p>Mr and Mrs Southard</p>
42.2	<p>Existing schools in the area would not be able to accommodate the additional children. Although new schools are proposed in the document, it is not clear where these would be. If they are in Teignbridge, one group of children may be excluded from attending the schools – unless there is a change in boundaries.</p>	<p>DCC, as education authority, has advised that additional facilities will be required to serve the urban extension to the south west of Exeter. The masterplan will provide further details on this. Admissions to schools will not be determined with reference to administrative boundaries.</p>	

42.3	Removal of the green belt would result in urban sprawl – this should be resisted. It would have a detrimental impact on wildlife, wellbeing and may result in flooding. By crossing administrative boundaries, it could also lead to different council tax rates being paid by people in the same street.	Given the limited amount of available land within the boundary, the Council has few options when identifying land to accommodate 12000 dwellings. Development will need to be designed in such a way as to ensure it does not have an unacceptably harmful impact on biodiversity and minimises the risk of flooding through the incorporation of Sustainable Urban Drainage (SUDS). Development often crosses administrative boundaries; council tax is paid for the services provided by the relevant authority.	
43.1	There is no need to delay progress on adopting a Core Strategy. GOSW has advised all councils in the region that the RSS, as proposed to be amended by the Secretary of State in July 2008, is to be given 'considerable' or 'significant' weight and that Councils should proceed with their LDF documents.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings and employment land provision of 60 hectares.	Dale Evans, Alder King on behalf of Ibstock Building Products Ltd.
43.2	Ibstock supports the RSS requirement for 15000 dwellings within the Plan period.	The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	
43.3	The Ibstock brickworks site is referred to as one that is able to deliver housing. This reference is supported. It is available and likely to be redeveloped in the short-term.	Noted.	
43.4	The generic, specific and implied list of development contributions and general infrastructure requirements in relation to the strategic allocations is onerous. Paragraph 5.2 should be amended to acknowledge guidance in Circular 05/2005 and to acknowledge that viability is a material issue.	Infrastructure requirements are informed by DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study. Contributions will be sought in accordance with Circular guidance; viability will be a central consideration.	
44.1	In the absence of evidence to the contrary, the growth areas set out in the consultation document should be considered likely to have a significant effect on the	Initial work on the Habitat Regulations Assessment (HRA) has been carried out by consultants (WSP). Natural England has been closely involved in this	Gavin Bloomfield, RSPB

	<p>Natura 2000 sites. Consequently, an appropriate assessment, under Regulation 48(1) of the Conservation Regulations 1994, of the implications of the proposals needs to be undertaken. RSPB is not aware that any such statement has been made, nor that the information to inform it has been made available through the consultation document.</p>	<p>work. Further work, focusing on the strategic allocations, is currently underway and the final HRA will be published when the Core Strategy is published for pre-submission representations.</p>	
44.2	<p>RSPB is not aware work has been undertaken on the availability of potential measures to mitigate risks to Natura 2000 sites arising from growth. Without this, there can be little confidence that these risks can and will be addressed. Measures must be both available and effective. It is accepted Green Infrastructure (GI) provision could play a role in mitigating risks. However, the use of alternative greenspace to divert recreational pressures is largely untried and untested. RSPB does not believe the Growth Point's GI Strategy can be relied upon to mitigate fully the risks. It is essential the delivery of GI and other methods of mitigating risks to the Natura 2000 sites are monitored to determine whether measures are effective and to trigger review if they are not.</p>	<p>Initial work on the HRA has been carried out by consultants (WSP). Natural England has been closely involved in this work. Further work, focusing on the strategic allocations, is currently underway and the final HRA will be published when the Core Strategy is published for pre-submission representations.</p>	
44.3	<p>It is essential the Council works closely with Teignbridge and East Devon District Councils to understand the consequences of their growth plans on Natura 2000 Sites and to identify, secure and support delivery of measures to ensure that growth avoids harm to those sites.</p>	<p>Exeter City Council is working closely with neighbouring Authorities, the Growth Point team and other key stakeholders on the growth plans for the area. 'In-combination' impacts of growth are being considered through the HRA.</p>	
44.4	<p>RSPB is involved in a project seeking to understand the current levels of water sports in the Estuary and their effects on the Estuary's waterbirds. The Council is urged to consider using this work to help inform assessment of the planned growth for the area.</p>	<p>The Council will consider this work in implementing the recommendations of the HRA.</p>	

44.5	Until the measures mentioned above have been taken, the Council cannot adopt its Core Strategy because it is not able to ascertain that it would not have an adverse impact on the integrity of Natura 2000 Sites.	The Council will publish the HRA when the Core Strategy is published for pre-submission representations.	
44.6	The main sites identified all have some intrinsic ecological value, which should be identified, retained and enhanced through any masterplanning process. Robust GI should be incorporated and a significant proportion of each should be left undeveloped. It is not clear whether the numbers and densities for dwellings allow for extensive GI provision.	Masterplans for the strategic allocations draw on the Green Infrastructure Strategy to ensure suitable provision is made.	
44.7	The Newcourt site is a potentially significant corridor for curlew, to spread east from their current northerly range at Exminster, and as a more general wildlife corridor. The area should be masterplanned to incorporate GI with a particular focus on wildlife corridors.	The Newcourt Masterplan incorporates proposals for suitable green infrastructure, including wildlife corridors.	
45.1	Sport England does not consider the Core Strategy, as it currently stands, to be sound as it does not clearly demonstrate that the proposed policies are founded on a robust and credible evidence base for both indoor sports facilities and playing pitches.	The Council has produced many documents on sporting and open space facilities including Audit of Outdoor Recreation Facilities (2005), Public Open Space SPD (2005) and Implementing Open Space Requirements (2006). Sport England also worked with the Council, and neighbouring authorities, to produce Planning for Sport at the Exeter Growth Point and Maximising Planning Obligations to Sport (July 2008). The Exeter and East Devon Infrastructure Study considers sporting facilities and the additional needs arising from housing growth. The Local Planning Authority also works closely with the Council's Leisure and Museums team to ensure its evidence base is up to date.	Gary Parsons, Sport England

46.1	<p>It is clear from the SHLAA site submissions that Exeter has the land capacity to meet, and indeed exceed, the minimum housing target set in the Proposed Changes to the Draft RSS and therefore should be planning for at least this level of housing development.</p>	<p>The Council has assessed all of the sites put forward for consideration during the SHLAA process. Not all have been considered suitable for development. Therefore, the Council does not agree that the SHLAA proves land is available for in excess of 15000 houses. The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.</p>	<p>Huw Williams on behalf of various landowners in the City.</p>
46.2	<p>Newcourt, Monkerton/Hill Barton and Alphington clearly provide sustainable locations capable of accommodating strategic housing growth. However, the Core Strategy should not plan only for the minimum requirement as any delays to the realisation of the plan strategy would then inevitably undermine timely delivery of the required housing. The Core Strategy should allow for development at other strategically important locations - particularly the land between Topsham and the M5.</p>	<p>The Council considers the land between the M5 and Topsham is important in maintaining a strategic gap between Exeter and Topsham. It does not agree the land should be released for development and based on the findings of the Landscape Sensitivity and Capacity Study, it intends to maintain the landscape designation in this area.</p>	
46.3	<p>The Core Strategy, and any associated development allocations, should be prepared having full regard to the implications of planning policy requirements on project viability and deliverability. These matters are not mentioned in the consultation document, but will become increasingly important as essential infrastructure requirements are clarified and responsibility for delivery is determined.</p>	<p>Infrastructure requirements are informed by DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study. Contributions will be sought in accordance with Circular guidance; viability will be a central consideration. More detail will be provided through an Infrastructure Delivery SPD.</p>	

47.1	Bovis Homes believes Exeter has the land capacity to meet, and indeed exceed, the minimum housing target set in the Proposed Changes to the Draft RSS and therefore should be planning for at least this level of housing development.	The Council has assessed all of the sites put forward for consideration during the SHLAA process. Not all have been considered suitable for development. Therefore, the Council does not agree that the SHLAA proves land is available for in excess of 15000 houses. The new Government has set out plans to abolish the RSS during the next parliamentary session. As a result, the Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings.	Huw Williams on behalf of Bovis Homes
47.2	In considering all planning strategies and development plan allocations, it is important that the implications of planning policy requirements on project viability and deliverability are understood and taken into account.	Infrastructure requirements are informed by DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study. Contributions will be sought in accordance with Circular guidance; viability will be a central consideration. More detail will be provided through an Infrastructure Delivery SPD.	
48.1	The principle of development at Monkerton/Hill Barton is welcome. However, part of the land within this strategic allocation, at the western end, does not have to be developed as part of a huge comprehensive scheme but can still make a helpful contribution towards housing targets and delivery.	The site is a key element within the development area. There is a need for comprehensive development within the strategic allocations. This is set out in the Masterplan for the area.	Julie Higginbottom, C2C Planning Consultants Ltd
49.1	Too many houses are being proposed.	The Council has decided to proceed with its Core Strategy on the basis of a housing provision of 12000 dwellings. Significant provision is needed to ensure housing needs are met and to redress the imbalance between employment and housing provision.	Chris Pope

49.2	The density of 50 dwellings per hectare should be revised down to 39 dwellings per hectare. The UK average for 2007 was 44, London having 74 and East of England 35.	Higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. The challenge for developers is to design high density schemes without detracting from the quality of the living environment.	
49.3	There should be protection for existing areas of low density where houses with large gardens are being redeveloped at high density creating difficult conditions in areas not necessarily equipped with the infrastructure and decreasing established quality of life.	The Exeter Local Plan includes policies regarding infill development; these policies will be reviewed in producing the Development Management DPD. However, both national and local planning policies encourage infill developments, where appropriate. Each proposal is considered on its merits.	
49.4	Building close to the M5 should be banned as to create housing near to sources of air pollution and noise can only lead to poor health and poor quality of life. A barrier of land should be established along all major highways with tree planting to mitigate environmental impacts.	The Masterplans for Monkerton/Hill Barton and Newcourt provide for buffers along the M5. Developers will need to design schemes that do not create an unacceptable quality of amenity for future residents on these developments.	
49.5	Housing developed without local employment and “supermarket” facilities will add to traffic congestion. Housing and employment land need to be co-located.	The planned urban extensions all include an element of employment provision and will also provide local shopping facilities. The HQPT scheme, and proposed new railway stations, will be important in providing access to major employment centres in Exeter without adding to congestion.	
49.6	Each new home with a south facing roof should be required to have solar energy generation and export to the national grid, a 10% contribution is far too low.	The Council is unlikely to adopt a policy as rigid as this - solar energy is appropriate in some, but not all, circumstances. However, the Core Strategy does contain policies on decentralised, renewable and low carbon energy and sustainable construction. The Council intends to produce an SPD to provide further guidance on these issues. A forthcoming SPD on residential development will also address these matters.	

49.7	<p>In the recent past houses have been built to service the idea that house ownership = profit, thereby creating houses that are not sustainable in the long term for family living. House buying decisions are based on long term needs with attention to room size, location etc. and not on a quick turnaround as a springboard for the next house purchase. Therefore building high density “yuppie hutches” will create in the long term the conditions for future poor quality housing stock.</p>	<p>The Exeter and Torbay Housing Market Assessment (HMA) identifies a continuing need for a mix of housing including a substantial amount of 1 / 2 bedroom accommodation. In addition, higher densities are required to achieve sustainable forms of development. They are important in maximising public transport use and the economic prospects for Combined Heat and Power (CHP) facilities. Both of these are essential factors in moving towards a zero carbon future. Good layout and design will be required to ensure high densities do not harm the quality of the living environment. Further guidance on this will be set out in the Residential Design SPD.</p>	
49.8	<p>Do not build in flood plains or in places that will constrict the future flows of heavy rainfall.</p>	<p>The Council has already carried out flood risk work. A Strategic Flood Risk Assessment (Level 1) has been completed and published. Level 2 work is ongoing. The Core Strategy takes a precautionary approach to flood risk in accordance with Government guidance. Areas of higher flood risk are avoided and Sustainable Urban Drainage (SUDS) is required for new development. The level of risk, and proposed measures taken to mitigate the risk, will be an important consideration during the Development Management process.</p>	
49.9	<p>Does the 15,000 dwellings target take account of the university expansion plans and university provided student accommodation and the potential release of multi occupancy student housing into the non student stock?</p>	<p>The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. The amount of student housing released into the non-student stock is relatively small, particularly when compared with the amount of non-student stock converted to student accommodation as a result of university expansion.</p>	

49.10	Traffic congestion is already at too high a level at peak times. Does the allocation consider a Park & Ride scheme or public transport provision in each development area that will at least equal the levels of traffic generation? The strategy needs to identify traffic pinch points and allow for capacity expansion at each location equal to or more than the percentage increase in housing stock/journeys to work.	In accordance with DCC's Local Transport Plan and Access Strategies, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth.	
49.11	Is there adequate employment for the additional population?	In the past, there has been an over-provision of employment land and so the proposed housing growth should not result in a shortage of employment opportunities. Whilst the recession is clearly having an effect, the RDA and the GOSW consider that over the Plan period, Exeter will play a major role in raising productivity and delivering sustainable growth in the region by building on existing economic strength and investing in the skills and knowledge base. Research for the Regional Assembly indicates that overall employment in the Exeter area is expected to grow by up to 28,500 jobs over the next 20 years.	
49.12	Is there adequate educational resource for the additional population? Is there adequate recreation for the additional population?	DCC, as the local education authority, has identified the need for additional educational facilities; these requirements have informed the Exeter and East Devon Infrastructure Study. This Study also considers sport and recreation, and green infrastructure, requirements. The Masterplans for the urban extensions make provision for education and recreation facilities.	
49.13	Is there adequate city centre shopping capacity for the additional population? Is there adequate local shopping resource for the additional population in each of the development areas?	The Core Strategy proposes regeneration of the Grecian Quarter, which is likely to add significant retail capacity to the city. Masterplans for the urban extensions provide for local facilities.	

49.14	The Social and Community Infrastructure Study results are key to any decision regarding acceptance of the proposed strategy and no decision can be made before that study is completed, published and eventually adopted.	Noted. The findings of the Exeter and East Devon Infrastructure Study will play a crucial role in determining the infrastructure needs required to support the Core Strategy.	
50.1	The Council has had a difficult time responding to new RSS requirements and government guidance. The document is clearly laid out and thought through given the constraints the process places on all councils.	Noted.	David Mezzetti
50.2	It would have been helpful if a summary of the RSS evidence for this requirement had found a place in this document. Forward planning on such rigid forecasting in a resource-constrained and volatile world is not wise <i>even though that is what you have had to do.</i>	The new Government has set out plans to abolish the RSS during the next parliamentary session. The evidence base supporting the Core Strategy can be found on the Council's website.	
50.3	To retain flexibility, the strategic allocations should not be opened up until the maximum amount of housing has been achieved on the ECC-identified urban/regeneration and 'potential broad locations'. ECC will be under pressure from volume builders and private landowners to go for 'easy' sites in the strategic allocations.	Unfortunately, the Council would not be able to identify sufficient land to accommodate 12000 dwellings without the strategic allocations. The SHLAA demonstrates that if sites were phased in the manner suggested, the Council's 5, 10, 15 and 20 years housing targets could not be met. It is only by allowing flexibility in the range of sites available that the Council can meet the requirements.	
50.4	The Alphington allocation is green field, unnecessary and undesirable. The link with Teignbridge's Edge of Exeter Action Plan makes an all-too-easy case for massive development which compromises the sensitivity of the rural fringe of SW Exeter and fails to acknowledge the value of the agricultural land involved. The requirements of a more sustainable and secure local food supply will soon impel the presumption of retaining all suitable food growing capacity close to significant population centres.	It is considered that developing land in this area will result in a sustainable urban extension to Exeter. The wider landscape surrounding Exeter will be retained in agricultural use. Proposals for the urban extensions will incorporate green open space and allotment provision.	

50.5	An extension of housing in this area cannot possibly enhance the free flow of traffic into Exeter via the only obvious route (Alphington Road) which presently suffers a degree of congestion and pollution for which no viable solutions are presently available. Alternative in-City routes via the Devon Motel, Matford and Topsham Road have little capacity for increased traffic.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme, which will operate between Alphington and the City Centre, forms one important part of the strategy.	
50.6	The powers available under LDF legislation will not enable ECC to do much more than hope and persuade developers to meet the major transport and energy requirements. Exeter requires a radical, whole city, integrated transport system with significant public and private investment which will be harder to achieve in the current and future investment climate. Piling pressure on the system without any certainty of investment funds to reach radical transport solutions is certain to diminish the quality of life currently enjoyed in many parts of the City.	The Core Strategy, and the Masterplans for the Strategic Allocations, provide guidance on the key infrastructure requirements. These documents have weight in determining planning applications. Whilst negotiations with developers will be more difficult in the current economic climate, priority could be given to those developer contributions that ensure sustainable urban extensions and help to address climate change. The Council will also seek funding through the Regional Infrastructure Fund (RIF), the Community Infrastructure Fund (CIF) and the Low Carbon Infrastructure Fund.	
50.7	There are no comments in the document recognising (a) the reality of escalating costs of fuel as the world moves towards 'peak oil' and how this will impact on decision-making at every level and how it will affect every planning decision that is made in support of continued, dispersed housing growth (predict and provide), and (b) the carbon cost of this growth in the context of climate change.	The purpose of the document is to seek views on some significant matters that have arisen since the Preferred Options stage in 2006. The Core Strategy makes it clear that addressing climate change is a key challenge. The focus throughout is to achieve low carbon development that mitigates and adapts to climate change.	
51.1	The document focuses on accommodating housing growth. It is imperative the city centre evolves in an appropriate and co-ordinated way to provide the retail, leisure and related facilities required by a growing city. Therefore, it is essential that sites in the city centre, such as the Grecian Quarter, are accorded primacy for key town centre uses. Such a view accords with PPS6, RSS Policies HM4 and TC1 and Exeter Local Plan Policy KP3.	The Council does not disagree with any of these points but considers that in order to achieve a vital and viable city centre, housing development should also be provided within a mix of uses in the Grecian Quarter.	Tom Rocke, Turley Associates on behalf of Land Securities plc.

51.2	<p>The boundaries of the Grecian Quarter regeneration area, or how a target of 300 dwellings has been calculated, are not clear. The Princesshay redevelopment delivered 123 residential units. It is unclear how the residential potential of the Grecian Quarter has been assessed as more than double that of Princesshay at a time when the market for the only type of residential accommodation appropriate for multi-storey mixed use schemes is far less certain.</p>	<p>The boundaries of the Grecian Quarter are set out in the SHLAA. It encompasses a wider area than the bus and coach station, which will be the subject of a Masterplan. The Council considers the housing figures are reasonable and that there is potential for significant housing delivery within this wider area.</p>	
51.3	<p>There must be flexibility in the range of uses to be accommodated – particularly in respect of non-key town centre uses such as residential. Further, the precise form, scale and complexion of development should be worked out through the preparation of a masterplan. Until a viable blueprint for redevelopment is established, it is premature to identify an expectation of a quantum of residential development to be delivered from the area. This is particularly the case where priority is accorded to non-residential development.</p>	<p>Further detailed work will be prepared for the area in due course. The Council considers 300 dwellings is a reasonable expectation for housing delivery in the area but anticipates the primary emphasis will be on retail and other city centre uses.</p>	
52.1	<p>All new developments should seek to maximise availability and use of public transport, and discourage to the greatest extent possible the use of private transport. Traffic levels, especially at peak times, are increasing; they are already beyond the limits of what the highway network can cope with, with only short-term palliatives being put forward to increase capacity. High quality affordable public transport must be provided for all newly-developed areas. Pedestrian and cycle links (separated) should be provided throughout new developments as far as possible.</p>	<p>A key objective of the Core Strategy is to encourage a modal shift away from travel by car. In accordance with DCC's Local Transport Plan and Access Strategies, the Exeter and East Devon Infrastructure Study and the Green Infrastructure Strategy, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme forms one important element in the strategy. On major schemes, the Council will seek layouts that have good permeability and linkages to existing highways, which are conducive to cycling and walking.</p>	<p>Walter Brown, Campaign for Better Transport, Devon Group</p>
52.2	<p>All developments <i>must</i> include local schools, surgeries, shopping and other facilities to avoid the need for unnecessary travelling.</p>	<p>The Exeter and East Devon Infrastructure Study, along with Masterplans for the strategic allocations, identify social and community infrastructure requirements.</p>	

52.3	A rail station for Monkerton will be required on the Exmouth line. This should be near Honiton Road to provide rail services to Exeter Business Park and the north west corner of Sowton Industrial Estate. A rail station will also be required at Newcourt – a site already safeguarded by a recent planning permission.	These matters are addressed in the Core Strategy and will be considered further in the Masterplans for the strategic allocations.	
52.4	The half-hourly rail service needs to be increased to every 15 minutes, as the existing frequency cannot cater for the additional traffic that will be generated by the growth.	Network Rail has recently published its Route Utilisation Strategy. The Council made representations on this matter and will continue to work with Network Rail to ensure services are sufficient to meet the additional demand.	
52.5	An orbital bus route is needed, linking the newly-developed areas with major facilities elsewhere such as the main Hospital, business/industrial estates, University.	The HQPT project will link some of these facilities. The orbital bus route is also being examined.	
52.6	Parking spaces should be as low as possible.	Policy T10 of the Exeter Local Plan sets the current maximum for car parking spaces. Further detail will be provided by the Residential Design Guide SPD.	
52.7	Car clubs should be provided on these developments. These are proven to reduce levels of car ownership.	The Council has Supplementary Planning Guidance (SPG) on car clubs. However, it does not seek to impose it on all developments. The most appropriate sites tend to be in the City Centre, e.g. the Grecian Quarter, where there is close proximity to a range of services and facilities and where space for car parking may be limited.	
53.1	The Council needs to be proactive in allocating increased employment land, housing and infrastructure capacity. This will be critical in supporting the city's continuing economic buoyancy. The Agency welcomes the consultation document – particularly where it identifies strategic locations for growth. This will offer great certainty to potential investors and developers.	Noted.	South West Regional Development Agency

53.2	Regarding the Exeter Employment Land Review 2009, the Agency is conscious of the lack of available sites for city centre development. It is important future iterations of the Core Strategy and the wider Local Development Framework promote high value-added employment opportunities, on a whole economy basis, at the most sustainable locations both in and out of the city centre.	The Council agrees with this. This is central to the Spatial Strategy.	
53.3	The Agency supports the delivery of improvements to the City's transport infrastructure and the HQPT proposals.	Noted.	
53.4	Proposed rail halts at Newcourt and Monkerton/Hill Barton hold the potential to form important components of Exeter's public transport complement. Presuming they will be operationally feasible and their delivery financially viable, their early provision should serve to significantly mitigate the impact of additional private vehicle trips.	Agreed. These matters are addressed in the Core Strategy and will be considered further in the Masterplans for the strategic allocations.	
53.5	The Agency welcomes the consultation document's suggestion that opportunities to achieve exemplary sustainable development should be fully explored. Supported by evidence, the Agency is keen to see this approach integrated into the Core Strategy and the wider LDF as it progresses.	Noted. Sustainable development forms a key objective in the Council's Core Strategy.	
54.1	The growth areas strategy as published is supported.	Noted.	Richard Shaw, Savills
54.2	The Darts own 28.5ha of land fronting Topsham Road adjoining the Dukeminster and Persimmon landholdings. Earlier work has shown that, subject to housing densities and the level of facilities needed on site, this area can accommodate around 900 dwellings. The land can be released as an early phase for growth.	A Newcourt Masterplan has been prepared, which identifies appropriate levels of development for the area.	on behalf of Messrs M, P and J Dart

54.3	The respondents are currently considering appropriate design approaches as they wish to create a new community with high quality design and sustainability credentials which also integrates fully with surrounding areas.	The Council welcomes this.	
54.4	The need for appropriate facilities is acknowledged provided there is an equitable apportionment of these costs across all developments within the Newcourt area. It is inappropriate for this land to be used to make up for any shortfalls as a result of other developments not providing for their needs.	The requirements for the area are set out in the Newcourt Masterplan. A separate process will be required to ensure all landowners come to an agreement on land equalisation. The Council recognises the importance of such an agreement in securing development for the area.	
54.5	It is inappropriate to integrate a gypsy site. Attention is drawn to Government advice on the correct procedures to follow (paragraph 35 of Circular 01/2006). Local authorities should look to dispose of land for less than best consideration where it would help to secure the promotion or improvement of the economic, social or environmental well being of the area. Authorities should also consider making full use of the register of unused and underused land by public bodies.	The RSS, which the new Government proposes to abolish in the next parliamentary session, had set out the level of provision for both permanent and transit gypsy and traveller sites. However, the evidence base was largely produced locally by the Devon-Wide Gypsy and Traveller Housing Needs Assessment. Therefore, there remains an imperative to meet the needs of this minority group and to avoid unauthorised encampments. There is a requirement for the provision of 25 permanent and 5 transit gypsy and traveller pitches over the plan period. Provision is therefore required on both strategic allocations.	
54.6	Paragraph 5.20 refers to the landscape sensitivity of the ridge on the boundary between Exeter and Teignbridge. It is accepted this approach is well established. However, when dealing with the west side of the city, it is clear the ridge that has most prominence, and more importance, is that lying within Teignbridge. This ridge lies between the A379 and Exminster and has been clearly identified at the recent consultation events as being the key ridgeline. Development breaking the ridgeline referred to in paragraph 5.20 will, therefore, sit within the context of the ridgeline to the south which has more visual prominence.	The Council agrees that the ridge within Teignbridge has greater prominence. However, any development within Exeter should respond sensitively to the inner ridge.	

55.1	The extension of the plan to 2026 in line with the Proposed RSS is supported.	Noted.	Bob Maynard / Dave Parsons, Devon County Council
55.2	Provision should be made in all new housing for High Bandwidth ICT (optic fibre) connections to enable flexible working practices.	Noted. The Exeter and East Devon Growth Point's Sustainable Design and Low Carbon Infrastructure Strategy looks at this issue in more detail.	
55.3	There is a need for a City vision to reflect the possibility of 28,500 additional dwellings (a population of 200,000) in the wider SSCT area.	The Exeter Core Strategy is concerned with setting out a vision for the scale of growth proposed within the City, whilst taking into account the implications of growth in the wider Exeter area.	
55.4	The sites at Newcourt, Monkerton/Hill Barton and Alphington are supported as sites for major development.	Noted.	
55.5	In the strategic sites section, more emphasis should be placed on achieving high levels of sustainability - particularly with regard to low carbon and renewable energy and innovative low carbon technologies and systems to achieve this. Also, more emphasis should be put on the multi-functionality of green infrastructure, particularly biodiversity enhancements at Monkerton. The framework currently being developed for Alphington should be mentioned explicitly. It is important that the transport / wildlife connectivity / links to the development in Teignbridge, and back into the city, are made explicit.	The document has been produced for the purposes of consultation. The purpose of the document is to seek views on some significant matters that have arisen since the Preferred Options stage in 2006. Sustainability and the transition to a low carbon economy are key themes running throughout the Core Strategy. The Core Strategy addresses matters relating to wildlife corridors, biodiversity, green infrastructure and decentralised, renewable and low carbon energy. Masterplans for the strategic allocations will consider these matters in further detail.	

55.6	Additional infrastructure that should be mentioned in the Core Strategy includes:- i) expansion of Exeter Airport, ii) enhancements and provision of new walking and cycling routes, iii) proposed new energy from waste plant at Marsh Barton, iv) environmental improvements to St. Davids and Central railway stations v) the bus station redevelopment, and vi) the development of strategic cycle linkages across the city. Whilst these requirements help to mitigate the impacts of future development, they also have a wider role in contributing to the delivery of the overall strategic vision and strategy for the city.	Noted. The Council is aware of these proposals/aspirations. The Core Strategy refers to them all in varying degrees of detail.	
55.7	Water Lane and the Grecian Quarter pose difficulties in the provision of school places. The schools are already full and are unable to accommodate the existing future pupil numbers. There may be a need to object to house building in these areas if new schools cannot be provided.	ECC will continue to work with DCC, as the local education authority, on these matters.	
55.8	Although Ibstock Brickworks has closed, it would be premature for the remaining permitted mineral reserves at Pinhoe Quarry to be 'written off' without full consideration of any potential alternative markets for the brick clay resource. This should be undertaken through progression of DCC's Minerals Core Strategy over the next two years. Until that is adopted, a holding objection to non-mineral development at Pinhoe Quarry should be maintained.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, Pinhoe Quarry is no longer identified as a broad location for development although the site may come forward as a windfall site in due course. Recently, Devon County Council, as the Minerals and Waste Authority, has advised Exeter City Council that it does not have a minerals objection to the site being developed.	
55.9	A number of text changes are suggested.	The document has been produced for consultation purposes. The Core Strategy sets out in detail the Council's key objectives, policies and vision for Exeter for the period up to 2026.	
55.10	The provision of a Park and Ride site at Cowley Bridge is under consideration.	Noted.	

55.11	At Monkerton there is a requirement for two primary schools and expansion/enhancement of Ellen Tinkham School. Also, a range of transport requirements including a rail halt on the Exmouth line and bus priority measures (particularly for HQPT).	The Monkerton/Hill Barton Masterplan incorporates these requirements.	
55.12	To influence travel behaviour, workplace and school travel plans need to be developed to reduce the negative impacts of travel on congestion, carbon emissions, the environment and health. With major employment developments, workplace charging should be considered with revenue used to improve sustainable transport.	Noted. These issues are covered in the Core Strategy.	
56.1	The Authority is commended for undertaking this consultation as part of the Core Strategy process. The document is concise and builds on previous consultations.	Noted.	Andy Roberts, Government Office for the South West
56.2	Extending the plan to 2026 is supported as the Core Strategy needs a 15 year horizon to comply with PPS12. If this cannot be achieved, the Council will need to consider a plan period beyond 2026. The Council does not have an up to date Local Development Scheme. This should be addressed as soon as possible.	An updated Local Development Scheme has now been submitted to the Government Office for the South West.	
56.2	There is no reference to the key findings of the 2007 Exeter and Torbay HMA. For Exeter City, it suggests a five year requirement for some 5300 additional homes – the plan should address the outcomes of the HMA.	The Core Strategy does address this matter.	

56.3	The level of reliance on windfalls is of concern. Whilst PPS3 does permit the inclusion of windfalls after the first 10 years, it is clearly the preference that a plan identifies a combination of sites and broad locations for growth. Reliance on windfalls will need to be justified. It is not clear how the figure of 200 dwellings per annum is calculated and if it is based on robust evidence. This may affect the soundness of the strategy.	The Council is now proceeding with its Core Strategy on the basis of a housing provision of 12000 dwellings. Therefore, it no longer needs to rely on windfalls to meets its housing allocation. Nonetheless, given past trends, it is reasonable to expect a steady supply of dwellings to be delivered through windfall sites over the Plan period.	
57.1	At the next stage of the planning process, leisure and sporting activities should be treated as a dimension of equal status to those of the public utilities. It can be confidently expected that new dwellings will be connected to the sewerage system and have a clean water supply. It is not so clear that residents will have immediate and convenient access to open spaces and community centres and the opportunity to participate in their chosen sport.	The Exeter and East Devon Infrastructure Study has looked at sports and recreation provision, and community facilities, in the city. This work complements that already undertaken by Exeter City Council (see Section 45.1). Broad guidance on the protection and provision of community and recreation facilities is set out in the Core Strategy. The Green Infrastructure Strategy also provides guidance on requirements for the strategic allocations. Further advice will be set out in the Development Management DPD and the Infrastructure Delivery SPD.	Jeffrey Stanyer, partly on behalf of Exeter Cricket Club
58.1	In respect of traffic, 2500 additional homes in the Alphington area will bring the whole area to a standstill. It will also increase noise and pollution to the area.	In accordance with DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, the Core Strategy provides guidance on the infrastructure required to accommodate the proposed growth. The HQPT scheme forms one important part of the strategy. Core Strategy policies are also linked closely to, and complementary with, the Council's Air Quality Strategy and Air Quality Action Plan.	Mr and Mrs Cram
58.2	The primary school in Alphington and Westexe high school are already oversubscribed and any proposed increase would put a huge strain on the existing amenities which support the local community.	DCC, as education authority, advises additional educational facilities will be required to serve the urban extension to the south west of Exeter. The masterplan for the area will provide guidance on this.	

59.1	The Council will need to address the problem of more vehicles using Bridge Road. Consideration should be given to widening the road as well as to encouraging cycling to work and using public transport. Increased traffic bottlenecks will impact on businesses and may influence decisions on investment and expansion plans.	DCC is currently working on bringing forward a Principal Urban Area Major Scheme, which focuses on highway improvements on major corridors in Exeter including the area around Countess Wear Roundabout. Notwithstanding this, the Core Strategy encourages a modal shift towards public transport, walking and cycling.	Thomas Coles, MSM Software
60.1	Fundamental to the debate is the type of City people wish to work and live in. The very aspects that make Exeter attractive, its compact size and surrounding environment, are at real risk with the growth proposed in the RSS. It is appreciated the Council has little choice in needing to look at how this projected growth is to be accommodated.	Noted.	Mark Pellow, Exeter Property Initiative Committee, Exeter Chamber of Commerce
60.2	Additional weight must be given to the fact that many of the people who contribute to its economic well being, will continue to need to travel to work from outside of the City boundary. This means there is a significant need for infrastructure investment in particular in public transport provision. Strong consideration must be given to the retention of sufficient car parking in the City Centre to encourage the vitality of that area, as whatever improvements there are in public transport, provision must be made for allowing private cars to access the City Centre. The City serves a large hinterland, and public transport cannot provide all the answers economically.	The Council has no plans to reduce the amount of public car parking in the City Centre. The current target in the Exeter Local Plan is for the number of parking spaces to remain fixed at around 4300. However, the Council considers it important that a modal shift is achieved to accommodate the growth successfully. Core Strategy policies are designed to help achieve this goal. DCC's Local Transport Plan and Access Strategies will be important in identifying future transport needs. The HQPT scheme will provide important links between Cranbrook, the City Centre and Alphington.	
60.3	Sufficient land must be reserved for future employment growth, which may conflict with the high residential development allocations required to meet the RSS. In addition, the particular type of employment land envisaged should be more clearly identified. This is to ensure that the right type at the right price is provided - there is a lack of smaller basic cheap warehouses and industrial units.	The Core Strategy has been informed by the Atkins Exeter Employment Study and the Employment Land Review and provides for a range of employment to meet Exeter's needs.	

60.4	<p>In terms of alternative transport routes, further consideration should be given to improvements of the following:-</p> <ul style="list-style-type: none"> a) The London Waterloo to Exeter railway line. Opening a second line at Axminster, allowing a more regular service, is welcome. b) Ensuring sufficient Park and Ride facilities are provided on the edge of the City, including progression on the current proposals to the south west of at the A30 junction. c) Transport links from the Matford and Exminster directions to the City Centre, by making appropriate use of the towpath of the Canal. 	<p>Point a) is noted. DCC's Local Transport Plan and Access Strategies, and the Exeter and East Devon Infrastructure Study, provides guidance on the additional needs to help the area accommodate the proposed growth.</p>	
61.1	<p>The Forum does not wish to comment on proposed sites or dwelling allocation numbers. It welcomes important statements in the document relating to the incorporation of open spaces, green corridors and green infrastructure links as these meet recreational needs and provide sustainable movement networks for walking and cycling.</p>	<p>Noted.</p>	<p>Hilary Winter, Devon Countryside Access Forum, DCC</p>

61.2	<p>The Forum would like to see further consideration given to the following aspirations: identify strategic walking and cycling routes within settlements and ensure these link to surrounding rural areas and the rights of way network; recognise the rights of way network and its contribution to health, tourism and sustainability; protect rights of way network from development; ensure new housing developments link to the rights of way network, where appropriate; seek to develop circular routes within and around the City to encourage healthier lifestyles and minimise car use; seek to improve the safety for rights of way users where routes meet or run alongside busy or dangerous roads; give adequate consideration to the requirements of those with mobility needs; integration of transport links with rights of way, particularly strategic long distance routes; recognise other routes, such as unsurfaced Unclassified County Roads, and their contribution to recreational opportunities.</p>	<p>The points are noted; the Council does not disagree with any of the aspirations. The Core Strategy, the Growth Point Green Infrastructure Study and Strategy, and the Exeter and East Devon Infrastructure Study consider many of these matters. The Council endorses the principle of creating developments with good links and permeability to existing highways, green spaces and adjoining developments and will pursue this approach through the masterplans and the Development Management process.</p>	
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