

## EXETER CITY COUNCIL'S EMERGING CORE STRATEGY AND CONFORMITY WITH DRAFT NATIONAL PLANNING POLICY FRAMEWORK

### 1.0 Introduction

- 1.1 Exeter City Council submitted their Core Strategy to the Secretary of State on 28 February 2011 and an Examination into the soundness of the plan was held over a three day period beginning on 21 June 2011. Following the three day hearing the Inspector appointed to conduct the Examination decided to reconvene the hearing at a future date to specifically discuss issues relating to the 5 year housing land supply and the provision, costs and timing of infrastructure on the proposed strategic allocations to the east of the City. The reconvened hearing was arranged for 24 August 2011.
- 1.2 On 25 July 2011 the Department for Communities and Local Government published a consultation draft of the National Planning Policy Framework (NPPF) the primary purpose of which is to consolidate into one document existing Planning Policy Statements, Planning Policy Guidance Notes and some Circulars'.
- 1.3 The City Council have now been asked by the Inspector to assess how far the provisions of the Core Strategy conform to the principles outlined in the draft NPPF. This report considers this issue by considering how the vision and general policies of the Core Strategy conform to the general planning policies outlined in the NPPF. The report also highlights some areas where some dissonance occurs between the two documents.
- 1.4 This report draws upon three principal documents to assess the degree of conformity. Firstly the draft National Planning Policy Framework itself :-  
<http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkconsultation>
- Secondly the Impact Assessment published at the same time :-  
<http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkimpact>
- and lastly the practice guidance issued by the Planning Inspectorate to enable its Inspectors to familiarise themselves with the NPPF :-  
[http://www.planningportal.gov.uk/uploads/pins/advice\\_for\\_inspectors/nppf\\_consult.pdf](http://www.planningportal.gov.uk/uploads/pins/advice_for_inspectors/nppf_consult.pdf)
- 1.5 The part of this report concerned with general conformity assesses this against the same headings below as set out in the Planning Inspectorate Advice Note.

### 2.0 General Conformity

#### 2.1 Presumption in favour of sustainable development

The City Council view the continued employment and housing growth of the City as essential to the well being of the City, the sub region and indeed to a substantial part of the south west peninsula. The vision and policies underlying the Core Strategy seek to propose sustainable growth and is therefore in general conformity with both the recent ministerial statement on "Planning for Growth" and the presumption in favour of sustainable development that is a central tenet of the NPPF. The City Council recognise that Exeter is the most sustainable location to accommodate the levels of growth outlined in the Regional Strategy for the sub region and, to that end, sought to provide for as much growth as can be accommodated within the urban area in a sustainable fashion. The Core Strategy seeks to place no barriers to development other than the need to provide appropriate infrastructure in a comprehensive manner and to seek to minimise the impact of climate change.

- 2.2 Removing office development from Town Centre First policy**  
The Core Strategy has no proposal to apply a town centre first policy in relation to office development indeed the plan encourages the provision of B1 uses throughout the employment allocations.(Policy CP2 and minor change 38) and paragraphs 5.6 and 5.16 whilst encouraging the need to provide additional office space in the city centre also recognise the need to provide for offices elsewhere. The core strategy therefore is in conformity with this part of the NPPF.
- 2.3 Time horizon for assessing impacts**  
The Core Strategy makes no reference to this policy other than to talk generally about Planning Policy Statement 4. This matter will be dealt with in the proposed Development Management Development Plan Document (DMDPD) and there is no conflict between the Core Strategy and the NPPF in relation to this topic.
- 2.4 Removing the maximum non residential car parking standards for major developments**  
There is no policy in the Core Strategy relating to this subject. The NPPF policy will be dealt with via the DMDPD.
- 2.5 Selection of sites for Peat extraction**  
This proposal in the NPPF has no relevance to the Exeter urban area.
- 2.6 Mineral land banks**  
This proposal of the NPPF is relevant to the mineral planning role of the County Council and is not an appropriate Core Strategy policy.
- 2.7 Removal of the brownfield target for housing development**  
The Core Strategy has no minimum target for development on brownfield land. Paragraph 6.13 postulates that the Core Strategy housing targets will actually amount to 51% of these houses being built on previously developed land. The Core Strategy makes significant housing allocation on greenfield urban extensions and the Council would, in any event, argue that a tight urban area facing substantial employment and housing growth has to make efficient and effective use of all its land, and cannot afford to adopt challenging brownfield targets if it is to successfully deliver sustainable development based on local circumstances. The Core Strategy and NPPF are in conformity on this topic.
- 2.8 Allocation of an additional 20% of their sites against a five year housing supply**  
The ability of the City Council to show a five year housing land supply set against the annualised requirement of the Core Strategy was discussed at some length during the Examination into the Core Strategy. The Council's view was that the issue was one of delivery rather than land supply and that sufficient land was allocated to deliver the additional housing but, due to the economic downturn, developers were not bringing sites forward. The Inspector asked the Council to draw up an Interim Action Plan to seek to improve the land supply situation. Such an Interim Plan was prepared and was discussed at the reconvened Examination. The land supply situation has improved significantly with a number of planning permissions being granted and developers submitting applications for large development. There is no conflict in principle between the Core Strategy and the NPPF, the land supply requirement has just become more challenging.
- 2.9 Remove the national minimum site size threshold for requiring affordable housing to be delivered**  
Policy CP7 of the Core Strategy sets a lower minimum site threshold than the present minimum and seeks to achieve an optimum affordable housing solution for the City. This policy is in conformity with the provisions of the NPPF.
- 2.10 Removing rural exception sites policy**  
This policy is not applicable to the urban area of Exeter.

- 2.11 **Protecting community facilities**  
Policy CP10 of the Core strategy seeks protection of community facilities and is therefore in conformity with NPPF.
- 2.12 **Green Belt**  
There is no Green Belt within the City Council boundary.
- 2.13 **Green infrastructure**  
CP16 of the Core Strategy seeks to protect and enhance the strategic green infrastructure and is therefore in line with the provisions set out in the NPPF.
- 2.14 **Green Space designation.**  
The concept of locally important green space is central to the policies contained in the Core Strategy. Such green space is presently protected by broad landscape designation with a proposal to introduce a criteria based policy to allow for development on this space in appropriate circumstances in the DMDPD. The Council welcomes the recognition of locally important green space in the NPPF and sees no conflict between this concept and the provisions of the Core Strategy.
- 2.15 **Clarification on which wildlife sites should be given the same protection as European sites**  
Proposed amendments to the Core Strategy following consultation with Natural England and RSPB have established a working method for applying the provision of the Habitats Directive to European sites. The Council believe such methods could be utilised if wider protection was required for other areas and see no conflict between the provisions of the Core Strategy and NPPF in this respect.
- 2.16 **Decentralised energy targets**  
Policy CP13 of the Core Strategy supports the concept of decentralised energy and is thus in conformity with the provisions of NPPF.
- 2.17 **Proactive approach to identifying opportunities for renewable and low carbon energy**  
Policy CP14 of the Core Strategy seeks to promote the use of decentralised and renewable low carbon sources and takes a proactive approach by requiring developments over a certain size to conform to the policy. This policy is therefore in line with NPPF provisions.
- 2.18 **Historic environment**  
Detailed policies for protection and enhancement of the historic environment will be set out in the DMDPD. The provisions of the Core Strategy do not conflict with NPPF in this regard
- 3.0 Dissonance**
- 3.1 The NPPF seems to envisage in the section on “plan making” a move away from the present Local Development Framework of Core Strategies supplemented by other Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) towards a single local plan document and proposals map. The very basis on which the Core Strategy has been prepared utilising the Regional Spatial Strategy and conforming with the strategic targets set out in the Regional Strategy sit rather incongruously alongside the NPPF which clearly not only envisages the abolition of Regional Strategies but also Core Strategies and the Planning Policy Statements.
- 3.2 The City Council remain convinced however that there is no conflict between the basic visions and policies of the Core Strategy and the NPPF and the Core Strategy remains a sound and robust basis for the future growth of Exeter.

- 3.3 The Council does however recognise that to some extent the Core Strategy now represents a transitional phase and will look to reconfigure its forward planning programme post Core Strategy to move nearer to the tenets of the NPPF. Such a reconfiguration may involve an amalgamation or abandonment of SPDs and DPDs presently set out in the Local Development Scheme and an enlarged Development Management DPD which together with the Core Strategy can provide the basis for a subsequent Local Plan.
- 3.4 The City Council recognises the importance of cross boundary working and there are references to such working in a number of sections in the Core Strategy. The expected demise of Regional Strategies will place greater emphasis in the “Duty to Cooperate” between local authorities and the Growth Point Board, set up by Exeter and East Devon Council, can provide a useful focus for such working. The NPPF re-emphasises the need for such inter-authority working and establishment of a system and structure for such work remains a priority for the City Council.

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