



**Exeter City Council**

**Draft  
Development Delivery  
Development Plan Document**

**NOVEMBER 2013**



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## **INTRODUCTION**

This document is the draft Development Delivery Development Plan Document (DPD); formerly known as the Site Allocations and Development Management DPD. It has been prepared taking into account the findings of the previous 'Have your say' consultation and the 2013 Strategic Housing Land Availability Assessment (SHLAA). The document includes some new site allocations, proposed policies together with full explanatory text and a draft Proposals Map. Stakeholders and members of the public are again invited to give their views on the document.

The Development Delivery DPD will form part of the Council's Local Plan. The Local Plan also includes the 2012 adopted Core Strategy which sets out the vision, objectives and strategy for the spatial development of the city up to 2026.

The Development Delivery DPD will:

1. Allocate land for new development.
2. Designate land for protection, safeguarding, or where specific policies apply.
3. Contain 'development management' policies that will be used to determine whether planning applications submitted to the Council should be granted permission.
4. Include a Proposals Map that will show allocations and designations.

### **Consultation**

Exeter City Council will be carrying out consultation between:

December and January 2013/14

You are invited to give us your views on the draft document. A response form is available for you to make your comments. Please feel free to comment on any issues you feel are important or relevant. If you need any help understanding what is proposed, or making your views known, please contact City Development using the details provided below.

### **Contact Details:**

**Please forward all response forms, or other correspondence relating to this document, to:**

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## Important Introductory Notes:

1. This document has been split into chapters, covering different topics, in order to help achieve a usable layout. Nevertheless, it is important that no chapter or policy is seen in isolation. Any proposals for development would need to comply with all relevant policies within the final document, together with those policies within the Core Strategy, any other DPDs, the Exeter St James Neighbourhood Plan and any other Neighbourhood Plans.
2. Policies within this document will be supported by advice and guidance contained within Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs). A list of existing guidance documents is available to view at <sup>1</sup>:  
<http://www.exeter.gov.uk/index.aspx?articleid=10093>
3. The policies proposed in this document are in conformity with the Exeter Core Strategy. The objectives set out in the Core Strategy are referred to at the start of each chapter to which they are relevant. The Core Strategy is available to view at:  
<http://www.exeter.gov.uk/index.aspx?articleid=10103>
4. This document also draws on the city's Sustainable Community Strategy; a strategy document that sets out nine themes which will contribute to meeting Exeter's long term vision. The Sustainable Community Strategy themes are repeated in this document at the start of each chapter to which they are relevant. The Sustainable Community Strategy is available to view at:  
<http://www.exeter.gov.uk/index.aspx?articleid=10771>
5. Policies proposed within this document have been informed by the National Planning Policy Framework published on 27 March 2012 and the National Planning Policy Guidance online resource. The National Planning Policy Framework is available to view at:  
<http://www.communities.gov.uk/publications/planningandbuilding/nppf>  
The National Planning Policy Guidance online resource is available to view at:  
[planningguidance.planningportal.gov.uk](http://planningguidance.planningportal.gov.uk)
6. In applying all policies proposed within this document regard will be had to viability and feasibility. In accordance with advice given in the National Planning Policy Framework development will 'not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.'<sup>2</sup>

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<sup>1</sup> Hard copies of all documents are also available for inspection at the Civic Centre

<sup>2</sup> National Planning Policy Framework , 2012, paragraph 173

# 1. EXETER'S LOCAL VISION FOR SUSTAINABLE DEVELOPMENT

Sustainable Community Strategy themes:

**A prosperous city**  
**A learning city**  
**An accessible city**  
**A city with strong communities**  
**A city that is healthy and active**  
**A safe city**  
**A city that cares for the environment**  
**A city with homes for everyone**  
**A city of culture**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 2: Develop the potential for economic and commercial investment**  
**Objective 3: Provide decent homes for all**  
**Objective 4: Provide and enhance retail, cultural and tourist facilities**  
**Objective 5: Achieve a step change in the use of sustainable transport**  
**Objective 6: Meet community needs**  
**Objective 7: Promote development that contributes to a healthy population**  
**Objective 8: Protect and enhance the city's character**  
**Objective 9: Achieve excellence in design**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policies:

**CP1: Providing for Growth – Spatial Strategy**  
**CP2: Employment Distribution**  
**CP3: Housing Distribution**  
**CP4: Housing Density**  
**CP5: Meeting Housing Needs**  
**CP6: Gypsies and Travellers**  
**CP7: Affordable Housing**  
**CP8: Retail**  
**CP9: Strategic Transport Measures**  
**CP10: Meeting Community Needs**  
**CP11: Pollution**  
**CP12: Flood Risk**  
**CP13: Decentralised Energy Networks**  
**CP14: Renewable and Low Carbon Energy**  
**CP15: Sustainable Construction**  
**CP16: Green Infrastructure, Landscape and Biodiversity**  
**CP17: Sustainable Design**  
**CP18: Infrastructure**  
**CP19: Strategic Allocations**

## Background

Sustainable Development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs<sup>3</sup>. There are three dimensions to sustainable development which translate into three roles for the planning system:

- an economic role
- a social role
- an environmental role<sup>4</sup>

These roles are mutually dependent and need to be considered as a whole.

### Exeter's local vision for sustainable development

At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (paragraph 14). Taken as a whole the policies within the NPPF constitute the Government's view of what sustainable development means in practice for the planning system, but it is also clear that 'Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas' (paragraph 10).

Exeter's approach to sustainable development is set out in the Core Strategy vision. It states:

*'Exeter will embrace its role in the region as an area of growth:*

*By providing houses, jobs and supporting infrastructure through maximising the use of previously developed land within the city, and through sustainable urban extensions to the east, at Newcourt and Monkerton/Hill Barton, and to the south west at Alphington; and,*

*By maintaining a vital and viable mix of uses in the city centre and delivering development to enhance Exeter's position as a premier retail and cultural destination.*

*In delivering growth Exeter will build on its strengths and assets by safeguarding the hills to the north and north west, protecting the historic environment and enhancing green infrastructure. The key is to maintain and improve Exeter's unique identity and quality of life, whilst addressing the challenges arising from climate change and facilitating the transition to a low carbon economy.*

*Exeter's strategic role will be enhanced by new housing and employment close to the city within the adjoining authorities. Significant new development will occur within East Devon including a new settlement and an urban extension to the east of Exeter.'*

This sits comfortably with the Government's vision of sustainable development.

All the policies within the Core Strategy are guided by this overarching vision. This Development Plan Document and its policies will also be guided by this vision.

The Core Strategy includes a number of policies that seek specifically to address climate change and achieve the transition to a low carbon economy. Policy CP13 of the Core Strategy seeks to bring forward decentralised energy networks within the city. Policy CP14 requires major development to use decentralised and renewable and low carbon energy sources to cut CO<sub>2</sub> emissions by at least 10% over and above those required to meet building regulations. Policy

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<sup>3</sup> Our Common Future (United Nations World Commission on Environment and Development, 1987)

<sup>4</sup> National Planning policy Framework, 2012

CP15 requires developers to demonstrate how sustainable design and construction methods will be incorporated and requires residential development to achieve the Code for Sustainable Homes Level 4 (rising to 5 in 2016) and non-domestic development to meet BREEAM 'Very Good' standards (increasing to 'Excellent' standards in 2013 and zero carbon by 2019).

However, sustainable development is about more than this; it is about delivering houses, jobs and supporting infrastructure and maintaining a vital and viable city. Central to achieving the delivery of supporting infrastructure is the Community Infrastructure Levy (CIL) which the City Council introduced on the 1 December 2013. CIL is a new form of charge that allows local authorities to raise funds from those undertaking development in their area. The money collected can be used to help provide a wide range of infrastructure that is needed as a result of development including transport facilities, low and zero carbon infrastructure, flood defences, schools, sports facilities and open spaces. The Exeter Infrastructure Delivery Plan identifies costs and timing of infrastructure requirements and will be monitored and updated with a view to bringing development forward as quickly as possible. In this way CIL, together with S106 contributions, will help deliver Exeter's Vision.

The policies in this and other documents should not be seen in isolation; they are mutually dependent and need to be taken as a whole to deliver sustainable development for Exeter. Policy DD1 brings together many of those considerations that contribute to delivering sustainable development ensuring that it is approached in a holistic manner.

***DD1: Development will be permitted where it is demonstrated that the proposal is consistent with the principles of sustainable development, as appropriate to its location, scale and form. Proposals should have regard to:***

- (a) the impacts of climate change and the need to achieve a transition to a low carbon economy;*
- (b) contribution to the city's economy;*
- (c) meeting community needs and delivering neighbourhood plans;*
- (d) suitability of location in terms of transport infrastructure and access to facilities;*
- (e) impact on the natural and built environment;*
- (f) contribution to meeting housing need and creating strong, vibrant and healthy communities; and,*
- (g) conservation and enhancement of the city's cultural heritage.*

The contents of the application, together with the design and access statement and any other supporting documents, should provide sufficient information (as appropriate to the proposal's location, scale and form) to allow the Council to assess whether the above requirements are met. In applying this policy regard will be had to other Development Plan Document policies, Supplementary Planning Documents and Guidance Documents where relevant.



## 2. REALISING EXETER'S ECONOMIC POTENTIAL

Sustainable Community Strategy themes:

**A prosperous city**  
**A learning city**  
**A city with strong communities**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 2: Develop the potential for economic and commercial investment**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policy:

**CP2: Employment Distribution**  
**CP18: Infrastructure**  
**CP19: Strategic allocations**

### Background

Exeter has benefited from high levels of economic productivity and significant inward investment. Exeter's vision is for growth and continued economic prosperity by creating a high quality knowledge based economy. Whilst the city's economic development is dependant on a diverse range of land uses this chapter focuses on employment land, access to jobs and communication networks.

For the purposes of the Local Plan, employment land is all land and buildings which are used or designated for purposes within Use Classes B1 (business), B2 (general industrial) and B8 (storage or distribution). At Matford and Marsh Barton, the use of premises for the sale of motor vehicles and motor vehicle parts and accessories is also regarded as acceptable. This is because car showrooms are well established in these two locations and their existing concentration serves to limit car travel.

Although other types of land use (for example retail) can provide employment these are excluded from the Local Plan definition of employment land. This is because these other uses tend to be associated with higher land values and therefore usually out-compete Class B uses in the market. To ensure that a broad range of job-creating land uses are available in Exeter, it is therefore important to provide for Class B uses. However, the release of employment land for other uses may be considered acceptable where an alternative use represents an opportunity that would create significant economic benefits for the city and its travel to work area.

### Employment Land Provision

The Exeter Employment Land Review (ELR) has assessed the suitability of existing and potential employment sites. Based on this analysis, the main opportunities to meet the city's employment requirements are:

- a) Redevelopment of previously developed land within the built-up area;
- b) Development to the east beyond the outer bypass; and
- c) Development to the south west in the Matford area.

Policy CP2 of the Core Strategy presents the high level spatial strategy for employment within the city, including the provision of about 15 hectares of employment land in the Matford area (planning

permission for which has now been granted) and the retention of the established employment areas at Southernhay, Matford, Marsh Barton, Sowton, Pinhoe, Exeter Business Park, Pynes Hill and Peninsula Park. Policy DD2 helps deliver the spatial strategy by allocating new employment land to the east at Exeter Business Park and Newcourt. Both of these allocations are in locations that are attractive to business, well served by transport infrastructure and will ensure sustainable mixed use urban extensions.

**DD2:** *The following sites are allocated for employment development and associated infrastructure and will be retained for this purpose:*

<i>Site</i>	<i>Area (hectares)</i>
<i>Exeter Business Park</i>	<i>4 hectares</i>
<i>South of the A379, Newcourt</i>	<i>16 hectares</i>

The established employment areas (retained for employment use by Policy CP2 of the Core Strategy) and the new employment allocations are shown on the draft Proposals Map.

### **Retention of employment land or premises**

There is significant pressure on employment sites from other land uses, particularly housing. Without policies to safeguard suitable employment land there is a risk that land and floor space would be lost to other uses. This would be detrimental not just to the economy but also to job opportunities for local people and the ability of Exeter to grow sustainably. However, it is also important to make the most efficient use of land and, in a rapidly changing economy, it may be that some sites should be released for other uses; for example if the site is no longer viable for employment use and ‘there is no reasonable prospect of a site being used for that purpose’<sup>5</sup>.

Core Strategy Policy CP2 provides the high level strategy relating to new employment allocations, established employment areas (Southernhay, Matford, Marsh Barton, Sowton, Pinhoe, Exeter Business Park, Pynes Hill and Peninsula Park) and other employment sites and premises. In order to achieve the Core Strategy objectives and to implement Policy CP2, Policy DD3 provides additional specific policy guidance in relation to how proposals involving the loss of employment land or premises will be determined. Policy DD3 takes a balanced approach that retains employment sites in most cases but sets out criteria that need to be met to demonstrate that an alternative use would be acceptable.

**DD3:** *Proposals involving the loss of employment land, site or premises will not be permitted unless the alternative use is sustainable in the location proposed and:*

- (a) it is demonstrated that development for an alternative use represents an opportunity that would create significant economic benefits for the city and its travel to work area; or*
- (b) the site or premises is not viable for employment use, cannot reasonably be made viable for such use and has been actively marketed at a reasonable price or rent for at least 12 months prior to the planning application being submitted; or*
- (c) the proposal would remove a use which creates residential amenity problems such as those arising from noise or odours.*

### **Provision of Local Services in Employment Areas**

The Council recognises that many of the successful employment areas in Exeter would benefit from the provision of some local services which would otherwise be located in existing centres. This could assist the workforce, be attractive to inward investors seeking a suitable location and

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<sup>5</sup> National Planning Policy Framework, 2012 (paragraph 22)

should also reduce the need to travel by car. Local services could include dentists, doctors, chemists, child care, post offices, banks, cash points, sandwich bars and small convenience stores for top-up purchases (with Class A1 floorspace not exceeding 80 sq m).

The acceptance of local services within the city's employment areas must not set a precedent for other uses. Planning permission should only be granted if it is demonstrated that the local service is not already suitably provided within the area. The service should meet local workforce needs only and not generate trips by people living or working outside the employment area and such services should be located within reasonable walking distance of the local workforce (which would normally be approximately 400 metres or 5 minutes walk<sup>6</sup>). The employment area of Southernhay is excluded from the provisions of Policy DD4, due to its close proximity to existing services in the city centre and surrounding urban area.

Policy DD4 identifies those criteria that a proposal for a local service must meet to be acceptable.

**DD4:** *Development involving the provision of local services at Matford, Marsh Barton, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be permitted provided that:*

- (a) the service is designed to serve local workforce needs only;*
- (b) there is sufficient demand for the service amongst the local workforce, over and above that currently met by any existing service in the area;*
- (c) it would be located within reasonable walking distance of the local workforce, taking into account new or enhanced routes provided or funded by the developer;*
- (d) it would provide clear benefits to the environment and the highway road network by reducing the need for workers to travel during the working day; and,*
- (e) it would not harm the primary function of the area as a business park or industrial estate.*

## **Access to Jobs**

The Core Strategy emphasises the need to address accessibility for all members of the community to jobs. Since the impact of the economic downturn began to be felt in 2007 there has been a significant rise in unemployment in Exeter (89%) and a 90% increase in young people aged 16-24 claiming Job Seekers Allowance.

Apprenticeships are central to the Government's strategy for skills, emphasising the need for people to develop work-place skills in order to increase their likelihood of sustainable employment. However, the number of apprenticeships offered by local companies remains low despite a wide range of grants and incentive schemes available.

Working with partner agencies, the Council will continue to focus its efforts on supporting unemployed people in taking the next step into employment, education, skills development or training and those suffering from low pay and poor prospects of improving their economic position. This includes helping people benefit from the employment opportunities offered by new developments and can involve:

- Work placements
- Apprenticeships
- Targeting local labour and contractors
- Pre-employment training programmes

**DD5:** *Development will be supported if it promotes and facilitates access to the jobs it creates amongst those residents of the city and its travel to work area including those who can have difficulty entering or returning to the labour market, young people and the unemployed.*

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<sup>6</sup> Standard taken from Building for Life criteria.

## Communication Networks

Effective communication networks are an essential and beneficial element in achieving sustainable economic growth and in enhancing the provision of local community facilities and services (NPPF, paragraph 42).

Access to improved and superfast broadband has the potential to transform the local economy, enabling businesses to work more effectively, access new markets, work flexibly, collaborate and innovate. Outside the work environment there has also been an increase in the demand for people, wherever they are, to keep in contact with family and friends as well as to access a wide range of entertainment media. Exeter backs the 'Get Connected' campaign which aims to enable all businesses and communities to have access to faster broadband by 2015. Highspeed broadband infrastructure, or as a minimum suitable open ducting to the public highway that can accept fibre optic cabling, will be sought for all residential and employment development under Policy CP18 of the Core Strategy.

There is also a need to consider the impact of the siting and design of new telecommunication equipment. Whilst the Council recognises the need to accommodate and facilitate the placing of new telecommunication equipment in the city, this type of development does raise unique design and visual amenity issues (which may impact on the wider landscape and extend outside the city boundary). Accordingly it is important that the number of telecommunications masts and sites are kept to a minimum consistent with the efficient operation of the network. Policy DD6 ensures that any adverse impacts are kept to an acceptable minimum.

**DD6:** *Telecommunications development will be permitted provided that:*

- (a) the siting and design of the equipment will minimise visual impact and their impact on amenity;*
- (b) the development does not have any unacceptable adverse impact on any area or site of historic, conservation, archaeological, landscape or biodiversity importance; and,*
- (c) the operator has investigated the availability, benefits and impacts of alternative sites and developments, including mast or site sharing, and has demonstrated that there are no practicable alternatives.*

Full supporting information to justify the proposed development will be required to be submitted as part of any planning application in accordance with the NPPF<sup>7</sup>.

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<sup>7</sup> National Planning Policy Framework, 2012, paragraph 45.

### 3. DELIVERING HOMES AND COMMUNITIES

Sustainable Community Strategy themes:

**A city with homes for everyone**  
**A city with strong communities**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 3: Provide decent homes for all**  
**Objective 8: Protect and enhance the city's character**  
**Objective 9: Achieve excellence in design**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policy:

**CP1: Providing for growth: Spatial Strategy**  
**CP3: Housing distribution**  
**CP4: Housing density**  
**CP5: Meeting housing needs**  
**CP6: Gypsies and Travellers**  
**CP7: Affordable Housing**  
**CP19: Strategic allocations**

#### Background

The Core Strategy sets out the Council's spatial strategy to deliver at least 12,000 new dwellings in Exeter by 2026. In delivering decent homes to meet the needs of the community the focus is on achieving attractive and sustainable communities and neighbourhoods where people want to live.

#### Housing Delivery

The National Planning Policy Framework emphasises the importance of boosting significantly the supply of housing (NPPF, paragraph 47). This document allocates land that has the potential to deliver new dwellings that will contribute to meeting the Council's spatial strategy.

The Strategic Housing Land Availability Assessment (SHLAA) identifies sites across the city with the potential to deliver residential development and identifies an indicative capacity for these sites. The SHLAA process is informed by a call for sites which requests that landowners/agents and others submit land which they consider has development potential. A careful assessment of site suitability has ensured that development constraints are recognised and environmental assets protected. A panel of key stakeholders with knowledge of the local housing development industry has also been involved in its preparation. The 2013 SHLAA has informed the contents of this draft document.

The Core Strategy identifies three strategic sites at Monkerton/Hill Barton, Newcourt and South of Alphington, which will contribute significantly towards meeting housing need. Policy CP19 of the Core Strategy identifies the strategic allocations, sets out the scale and quantum of development and stipulates associated infrastructure requirements. Whilst these strategic allocations have already been designated for development within the Core Strategy, the SHLAA also identifies other areas as having housing potential including the Grecian Quarter and the Water Lane Area ('Regeneration Areas'), together with a number of other identified sites within the urban area. Those sites already completed or that already benefit from planning permission, the Strategic Allocations (designated within the Core Strategy), the Regeneration Areas, other sites identified by the SHLAA, and windfall development will together meet the strategic requirement for at least

12,000 dwellings within the city to 2026. The relative contributions to meeting strategic housing need are as follows:

Dwellings completed/under construction/having the benefit of planning permission <sup>8</sup>	8022
Strategic Allocations (Newcourt, Monkerton/Hill Barton and Southwest Exeter) <sup>9</sup>	1915
Regeneration Areas <sup>10</sup>	939
Allocated Sites (identified by the SHLAA)	1083
Minor Sites (identified by the SHLAA for under 10 dwellings) <sup>11</sup>	29
Anticipated Windfalls	1229
<b>TOTAL</b>	<b>13,217</b>

The Regeneration Areas and allocated sites, which may be suitable for a range of residential uses (including specialist housing, student accommodation and gypsy and traveller provision), are identified in Policies DD7 and DD8 below.

### Regeneration Areas

The Regeneration Areas have the potential to support a mix of uses with a significant element of residential development and associated infrastructure (including transport facilities, low and zero carbon infrastructure, flood defences, schools, sports facilities and open spaces).

**DD7:** *The following areas are allocated as Regeneration Areas:*

*Grecian Quarter  
Water Lane Area*

*Within these areas proposals for redevelopment will be permitted in accordance with site specific planning guidance.*

The Regeneration Areas are shown on the draft Proposals Map.

The Water Lane Area is a highly sustainable location that is suitable for a mix of residential and other uses as part of a comprehensive redevelopment. Redevelopment would need to improve access for all forms of transport and address flood risk. A development brief or masterplan will be produced to guide growth in the Water Lane Area.

The Grecian quarter includes the Bus and Coach Station area (see Policy DD15) for which a set of 'Development Principles' have been approved. The Bus and Coach Station area is proposed for retail and leisure development as part of a mixed use development including an enhanced Bus Station. In addition offices, hotels and housing will be acceptable uses. The bus depot area also has the potential for redevelopment provided that a suitable alternative location for this facility can be delivered.

Other guidance may be prepared by the Council to guide development within the Regeneration Areas.

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<sup>8</sup> Since 2006 (and including sites with a resolution to grant permission subject to completion of a S106 agreement) of which 218 dwellings with planning permission are currently predicted to be completed beyond 2026.

<sup>9</sup> Potential for additional development in the strategic allocations (excluding completions, dwellings under construction and extant planning permissions) of which 365 dwellings are currently predicted to be completed beyond 2026.

<sup>10</sup> Potential for additional development in the regeneration areas (excluding completions, dwellings under construction and extant planning permissions) of which 589 dwellings are currently predicted to be completed beyond 2026.

<sup>11</sup> Sites identified by the SHLAA that are too small to be allocated; applications will be determined in accordance with policy DD9.

## Allocated Sites

Sites identified in the Revised 2013 SHLAA as suitable, available and achievable to deliver 10 or more dwellings are listed in Policy DD8:

**DD8:** *The following sites (for 10 or more dwellings) are allocated for residential and associated infrastructure development:*

	Gross Site Area (hectares)	Indicative capacity <sup>12</sup>
<i>Exmouth Junction, Prince Charles Road</i>	4.0 <sup>13</sup>	118
<i>Exwick Middle School, Higher Exwick Hill</i>	1.2	35
<i>Land adj Exeter St Davids Station</i>	0.9	87
<i>ERADE, Topsham Road</i>	3.8	149
<i>Land north of WESC Foundation, Topsham Road</i>	6.0	183
<i>Land east of M5, Exeter Road<sup>14</sup></i>	1.4	28
<i>Land off Liffey Rise</i>	0.6	13
<i>Land at Exeter Cricket Ground, Prince of Wales Road</i>	0.2	23
<i>Middlemoor Headquarters, Greenwood Road</i>	5.9	175
<i>Land west of Newport Park, Topsham Road</i>	1.6	22
<i>Land south of Apple Lane</i>	2.3	64
<i>Mary Arches Car Park</i>	0.2	50
<i>Land south of Woodwater Lane</i>	0.9	28
<i>Eastern Fields</i>	3.3	56
<i>Land opposite 7-10 Glenthorne Road</i>	0.5	15
<i>23-26 Mary Arches Street</i>	0.04	14
<i>Eagle Yard, Tudor Street</i>	0.1	10
<i>Foxhayes First School, Gloucester Road</i>	0.8	13
<b>TOTAL</b>		<b>1083</b>

These sites (for 10 or more dwellings) are shown on the draft Proposals Map.

## Housing on unallocated sites

The Council needs to encourage housing development to come forward in all appropriate locations within the city in order to help meet housing needs. Housing applications will be considered in the context of the presumption in favour of sustainable development (NPPF, paragraph 49).

In terms of residential development on unallocated sites the re-use of previously developed land can make an important contribution to meeting housing needs. The effective re-use of previously developed land is encouraged by the NPPF providing it does not result in the loss of land of high environmental value. Accordingly, proposals for housing on previously developed land within the urban area will generally be acceptable.

Proposals will also be assessed with regard to other policies within the Development Plan and therefore proposals that result in the loss of open space, allotments, and sport and recreation facilities (Policy DD23 and Policy CP10), community facilities (Policy DD24 and Policy CP10) or employment land or premises (Policy DD3 and Policy CP2) will not normally be acceptable. All proposals will also need to adhere to the Council's design principles (Policy DD26), achieve the highest appropriate density (Policy CP4), provide sufficient affordable housing (Policy CP7), provide adequate amenity (Policy DD14), design out crime (Policy DD27), protect the historic

<sup>12</sup> In many cases higher capacity can, and should, be achieved in accordance with Policy C4 (Density) of the Core Strategy.

<sup>13</sup> Exmouth junction has a gross developable area of approximately 6.13 hectares which includes a gross area of approximately 4 hectares that is potentially available for housing as part of a mixed use development that could also include transport uses.

<sup>14</sup> Including land north of Wessex Close

environment (Policy DD29), provide suitable access and parking (Policy DD21 and DD22), show how the development results in a net biodiversity gain for the Exeter area (Policy DD32) and address issues relating to pollution and contaminated land (Policy DD35).

The Strategic Housing Land Availability Assessment (SHLAA) will remain the most important way of identifying sites across the city with the potential to deliver sustainable residential development. However, it is recognised that some sites, including smaller windfall sites, will not come through this process, but can still make an important contribution to the housing supply. Policy DD9 seeks to ensure all suitable sites come forward for development in accordance with the presumption in favour of sustainable development (NPPF, paragraph 49).

***DD9:** Housing development will be permitted on sites assessed as deliverable by the Strategic Housing Land Availability Assessment and on other unallocated sites within the urban area, provided that other policies within the Development Plan are complied with.*

### **Housing development in residential gardens**

Residential gardens are not classified as previously developed land<sup>15</sup>. It must be recognised that gardens can make an important contribution to green infrastructure, biodiversity, flood mitigation and the health of urban ecosystems. Furthermore development in residential gardens can harm the character of the local area (adversely affecting urban form or the historic environment) and have adverse impacts in terms of design, amenity and access. This is particularly true for 'backland' development which can have significant adverse impacts upon neighbouring properties. Therefore, whilst new development in residential gardens can be an efficient use of land that makes a contribution to meeting housing need, in most cases 'backland' development will not be acceptable.

Proposals should demonstrate that they are in keeping with the character of the area by reflecting the pattern of streets and buildings, the plot sizes and the ratio of built form to garden, of the surrounding area.

Proposals will be assessed with regard to Policy DD9 above.

### **Housing for disabled people**

The NPPF requires that a mix of housing is delivered to meet the needs of different groups in the community including people with disabilities (NPPF, paragraph 51). The Council wishes to ensure that new developments will, as far as is reasonable, contribute to meeting the needs of disabled people and enable them to live as independently as possible in the community.

Part M of the Building Regulations, which deals with access and facilities for people with disabilities, means that all new housing is built to certain basic standards. Furthermore, the Core Strategy policy CP5 introduces the requirement that all new homes, where feasible and practical, should be designed to meet Lifetime Homes standards (standards which focus on delivering accessible and adaptable homes).

However, neither Building Regulations nor Lifetime Homes standards require housing to be designed with the potential to be occupied by people with severe physical disabilities and confined to wheelchairs.

As there is additional cost in providing the more generous than average standards required to ensure a dwelling meets full wheelchair standards, it is considered appropriate that only larger

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<sup>15</sup> The definition of previously developed land provided in the National Planning Policy Framework specifically excludes 'private residential gardens' (NPPF, paragraph 55).



scale developments should be required to provide such dwellings. Furthermore, as it is only through the involvement of the Council or Registered Providers that such housing can be assured to go to those in need, the requirement will only be placed on the affordable housing element of any residential scheme. The Council requires 5% of the affordable dwelling provision on qualifying sites to be designed so as to be accessible by people confined to wheelchairs.

**DD10:** *Proposals for major residential development of 20 or more dwellings or on sites of 0.5ha or more will be required to provide 5% of affordable housing that is designed so as to be accessible by people confined to wheelchairs in accordance with the Council's Wheelchair Accessible Housing Design Standards. The type of provision, in regard to dwelling size, will be informed by need.*

The Council's Wheelchair Accessible Housing Design Standards ensure homes for wheelchair users are designed in accordance with nationally recognised standards.

### **Loss of Residential Accommodation**

There is a high demand for housing in the city and a substantial requirement for new housing. The loss of existing stock could result in pressure for additional release of housing land which may result in harm to the landscape setting and character of the city. Retention of accommodation and making full use of the existing stock complements the identification of new residential sites and helps to ensure a wide choice of homes in accordance with the NPPF.

**DD11:** *Proposals involving a net loss of residential units will not be permitted.*

### **Residential Conversions and Houses in Multiple Occupation**

The use of the planning system to create sustainable, inclusive and mixed communities is central to delivering sustainable development (NPPF, paragraph 50). The conversion of an existing building (e.g. a dwelling or guesthouse) to flats or a House in Multiple Occupation (HMO<sup>16</sup>) can make a valuable contribution to housing stock, provided that environmental health standards are maintained, amenity is adequate and unacceptable highways problems do not result.

In Exeter, HMOs are mostly occupied by students. Existing HMOs are focused in certain areas of the city, which can affect their character and cause imbalanced communities.

The Council has introduced an Article Four Direction which means that changes of use from Class C3 to Class C4 will require planning permission in certain areas. In these areas the concentration of HMOs is significant and in total exceeds 20% and it is considered that additional HMOs would change the character of the area and undermine the maintenance of a balanced and mixed community.

Policy DD12 applies to conversions to flats, bedsits, proposed changes of use from Class C3 to Class C4 HMOs in the Article Four areas and, throughout the city, to proposals for change of use to Class C4 HMOs from all other uses and to changes of use to HMO dwellings to be occupied by more than six unrelated people. Policy DD12 ensures that conversions achieve adequate standards of amenity, do not cause unacceptable highway problems and avoid over concentrations of HMOs:

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<sup>16</sup> An HMO occupied by between three and six unrelated people, who share the facilities of a bathroom, toilet or kitchen is classified as use Class C4. A change of use from Class C3 (dwelling houses) to Class C4 does not normally require planning permission, but Councils wishing to exercise greater control are able to make Article Four Directions removing these permitted development rights. An HMO for more than six unrelated people is not within any use class (a 'sui generis' use).

**DD12:** *Development involving the conversion of a building to flats, bedsits, or a house in multiple occupation, will be permitted provided:*

- (a) the proposal would not harm the character and appearance of the building;*
- (b) the design, layout and intensity of use of the building would not have an unacceptable impact on neighbouring residential amenities;*
- (c) internal and external amenity space, refuse storage and car and bicycle parking is provided at an appropriate quantity, to a high standard and so as not to harm visual amenity;*
- (d) the proposal would not cause unacceptable highway problems; and,*
- (e) the proposal would not result in an over concentration of HMOs in any one area of the city, to the extent that it would change the character of the area or undermine the maintenance of a balanced and mixed local community.*

The Houses in Multiple Occupation SPD provides additional guidance on the implementation of policy and includes a map of the area covered by the Article Four Direction. The Council's Residential Design SPD provides additional details of the Council's approach to residential conversions and the Sustainable Transport SPD provides the standards used to determine an appropriate level of car and cycle parking.

### **Purpose built student accommodation**

The continuing growth of the University of Exeter is important to the future prosperity of the city. The University had about 16,000 students in 2011 and envisages that it will have about 18,000 students by 2018. The University's guarantee to provide housing for all first year undergraduate students who want it is supported because it will ease pressure on existing family housing. 75% or more of additional student numbers should be accommodated in purpose built student housing.

However, it is important that new purpose built student accommodation achieves appropriate levels of amenity for residents, and does not detract from the amenity of neighbouring residents.

Policy DD13 seeks to protect residential amenity and to ensure that purpose built student accommodation is fit for purpose:

**DD13:** *Purpose built student accommodation will be permitted provided that:*

- (a) it responds well to the local context and reinforces local distinctiveness;*
- (b) appropriate provision is made for refuse storage, parking for disabled persons and cycle parking;*
- (c) sufficient internal and external amenity space is provided such that students feel at ease and comfortable and accommodation is designed so as to allow easy conversion to other forms of residential use;*
- (d) it does not harm the amenity of neighbouring residents; and,*
- (e) a suitable Management Plan is submitted to demonstrate how the property will be managed in the long term.*

The Sustainable Transport SPD provides the standards used to determine an appropriate level of parking for disabled persons and cycle parking.

### **Residential Amenity**

It is important that the amenities of existing residents are protected and, where possible, enhanced by new development. It is also imperative that new housing development is designed to afford

future residents a good standard of amenity. Residential amenity can be affected by a number of factors, such as privacy, the availability of daylight or sunlight, the presence of light or air pollution, noise, disturbance, odours, fumes, vibration and security.

Policy DD14 seeks to protect the amenity of the occupiers of neighbouring properties and ensure new housing development affords residents a good standard of amenity:

***DD14: Development will be permitted provided that it does not have an unacceptable impact on the amenity of existing local residents and, where residential development is proposed, provides good living conditions and standards of amenity for future occupiers of the development. The following factors will be taken into account:-***

- *privacy and overlooking*
- *the availability of natural light and outlook*
- *whether the proposal is over-bearing*
- *light or air pollution*
- *noise and disturbance*
- *odour, fumes or vibration*
- *security*

*In respect of development involving new residential units, the following will also be taken into account:-*

- *whether sufficient internal and external space is provided for future occupiers; and*
- *appropriate provision of storage space for household items, cycles, rubbish and recycling*

The Council's Residential Design SPD and the Householder Guide to Extensions SPD provide additional guidance on the Council's approach to ensuring residents are afforded a good standard of amenity.

## 4. RETAIL, TOURISM AND CULTURE

Sustainable Community Strategy themes:

**A prosperous city**  
**A city of culture**  
**A city that cares for the environment**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 4: provide and enhance retail, cultural and tourist facilities**

Core Strategy Policy:

**CP1: Providing for growth: Spatial Strategy**  
**CP8: Retail**  
**CP19: Strategic allocations**

### Background

Exeter is a major retail centre attracting shoppers from across the region. The city's retail offer is currently ranked in the top 40<sup>17</sup> nationally. Exeter aspires to be ranked within the top 35. It is important that the status of Exeter as a retail destination is maintained and enhanced. Exeter is also a key tourist destination and cultural centre in the region and has the potential to play an even greater role in meeting the needs of visitors to Devon. Topsham is also an important tourist, cultural and retail destination in its own right.

### Retail Provision

The spatial approach to retail provision set out in the Core Strategy indicates that a sequential approach<sup>18</sup> will be followed that maintains and enhances the City Centre, District and Local Centres.

The boundaries of the network of centres set out in Appendix 6 to the Core Strategy have been reviewed and revised boundaries shown on the draft Proposals Map. Emerging centres have also been identified within the strategic allocations at Newcourt and Monkerton and Hill Barton.

### Bus and Coach Station Area

The Exeter Local Plan First Review identified the Bus and Coach Station area as a key development area. The adjacent Bus Depot also has the potential for redevelopment provided that a suitable alternative location for this facility can be delivered. The Bus and Coach Station Area is part of the wider Grecian Quarter Regeneration Area (see Policy DD7).

The Core Strategy Policy CP8 proposes 'around 3,000 square metres of net retail convenience floorspace and around 37,000 square metres of net retail comparison floorspace' in the City Centre, including 'up to 30,000 square metres of comparison floorspace in the Bus and Coach Station area, to be developed as part of a mixed-use scheme by around 2016'.

The Core Strategy further identifies the provision of a new Bus & Coach Station as a key infrastructure requirement 'critical to achieving a step-change in public transport use and [to]

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<sup>17</sup> Exeter is currently ranked at 38 within the top 50 UK centres (CACI National Retail Rankings).

<sup>18</sup> A sequential approach requires applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered (NPPF, paragraph 24).

deliver wider objectives for a vibrant and sustainable City Centre'. The new Bus and Coach Station should be accessible to all, should feel safe and should provide a good arrival experience for visitors. It should allow for transfer of passengers between buses and other transport modes.

It is considered important that any redevelopment of the Bus and Coach Station area meets its full potential to make a positive contribution to the City Centre. As well as a significant element of retail and leisure uses this area has the potential to support a mix of other uses, including non-family housing, as part of a comprehensive mixed use scheme. Given the size and importance of this site a set of 'Development Principles' have been prepared to guide development proposals.

**DD15:** *Retail and leisure development is proposed at the Bus and Coach Station as part of a comprehensive mixed use development including an enhanced Bus Station. The amount of retail floorspace will be determined in accordance with the Core Strategy and the most up to date assessment of retail capacity. Such retail development must not harm the viability and vitality of the City Centre as a whole. In addition offices, hotels and housing will be acceptable uses.*

The bus and coach station area is shown on the draft Proposals Map.

### **Change of use within retail centres**

Exeter offers a range of retail opportunities. The focus is the city centre, but outside this area are a number of important district and local centres. Retail uses form the core function of these centres, underpinning their vitality and viability.

Food and drink outlets are also important elements of a healthy retail centre, contributing to the vitality of the area and supporting tourism and the evening economy. Many visitors will judge the quality of a centre on the availability and quality of the food and drink establishments. Financial and professional services are also important to the vitality and viability of district and local centres, provided this is not at the expense of shops.

Within the city centre primary shopping area it is considered that the market achieves an appropriate balance of shops and other uses. However, within the secondary shopping areas of the city centre or any district or local centre it is important to avoid any damaging breaks in shopping frontage. These breaks destroy the atmosphere of a retail centre, reduce pedestrian flows and fragment its integrity. Any change of use that is likely to cause harm to the vitality and viability should not be allowed.

The Council considers that within the secondary shopping areas of the city centre or any district or local centre, a change of use may harm vitality and viability in the following circumstances:

- (a) the change of use within a shopping frontage of ground floor Class A premises to another use outside Class A;
- (b) the change of use of ground floor shops (Class A1) to food and drink establishments (Classes A3, A4 and A5) if, following implementation of the proposal and existing permissions, less than 50% of the separate ground floor premises within the same shopping frontage will be in Class A1 use;
- (c) the change of use of ground floor shops (Class A1) to financial and professional services (Class A2) if, following implementation of the proposal and existing permissions less than 50% of the separate ground floor premises within the same shopping frontage will be in Class A1 use; and,
- (d) the change of use of ground floor shops (Class A1) if, as a result, more than 3 single non-Class A1 units will be located immediately adjacent to each other, creating a break in a continuous shopping frontage.

The assessment of harm should also take into account the location, prominence and length of frontage, the nature of the proposed use (including the level of pedestrian activity associated with it) and the number of ground floor vacancies in the area.

The secondary shopping frontages in the city centre are identified in Appendix 1. The frontages will be subject to amendment on completion of major new retail development, such as the bus station area. Within the secondary shopping areas, each side of road is regarded as a separate shopping frontage. Each district centre and local centre is treated as a single frontage. In Topsham residential properties are not counted as part of the shopping frontage.

Policy DD16 seeks to protect the vitality and viability of the retail centres:

**DD16:** *Development involving the change of use of ground floor Class A premises will not be permitted if it would harm the vitality and viability of the secondary shopping areas of the city centre or any district or local centre.*

### **Protection and enhancement of tourist and cultural facilities**

Exeter's role as a key tourist destination and cultural centre has many positive benefits. It makes a significant contribution to the local economy, helps to increase Exeter's profile and positive image as a regional capital, develops new employment opportunities, improves the standard of living, delivers facilities that help meet the local community's needs and engenders local pride. For this reason, it is important that existing viable tourist and cultural facilities are not lost.

The majority of Exeter's existing tourist and large scale cultural facilities, such as the newly refurbished Royal Albert Memorial Museum, The Phoenix, Central Library and Underground Passages, are located within the City Centre and adjacent areas, including the Quayside. As such, the facilities are both nationally and locally accessible by public transport. These areas therefore remain the Council's preferred areas for future tourism and cultural development, such as visitor centres, cafes, restaurants, specialist shops, craft outlets, artists studios and galleries, theatres, public space for performance and leisure activities.

In all cases new facilities must be appropriate in scale and level of activity and in keeping with their location and surroundings (which will often include historic assets and important green infrastructure).

Policy DD17 encourages tourist and cultural uses in appropriate locations and ensures the retention of existing uses:

**DD17:** *Tourism and Cultural development proposals will be supported that:*

- *enhance the profile of Exeter as a tourist destination and cultural centre*
- *address deficiencies in the city's tourism and cultural offer*
- *contribute to the achievement of regeneration*
- *is of a form and scale that that does not harm the quality of the natural and built environment*
- *is easily accessible, to the community served, by public transport, walking and cycling*

*Attractions and facilities that serve the city and wider sub-region should be located within, or adjacent to, the City Centre.*

*Permission will not be granted for the change of use of a tourist or cultural attraction to another use, unless the proposed use will maintain or enhance the tourism and cultural offer, or the existing tourism or cultural use is not viable.*

## Hotels

Exeter is already established as a year round leisure and business tourism destination. This benefits the city through the provision of jobs and the support of services, which the local population alone could not sustain.

Hotels in the city centre and adjacent areas are the most sustainable in planning terms, since they allow greater access by public transport, contribute to urban vitality and regeneration, and allow visitors to easily access other city centre facilities and attractions. However, hotel facilities are also recognised as increasingly important to service corporate needs and with the development taking place to the east of Exeter this demand is likely to grow.

As part of the evidence base for the Core Strategy a Hotel Study was carried out in 2007 to review the demand for hotels in the Exeter area and make recommendations about the scale and nature of future provision which is required to service the area and contribute to its economic prosperity. The Study identified strong hotel developer interest in Exeter and this has resulted in the provision of additional hotel bed spaces. Nevertheless, there is continuing pressure for release of sites in other uses for hotel development both in the city centre and on the edge of the city, particularly along the motorway corridor. Utilising the evidence from the Hotel Study, and recognising the developments that have already been completed and those that benefit from planning permission, it is considered that once the works to increase the capacity of conferencing facilities at Sandy Park Rugby Stadium by c2000 delegates have commenced an additional 120 bedroom facility, located within reasonable walking distance of the conference facilities at Sandy Park, could be supported.

In assessing any proposal elsewhere the Council will demonstrate flexibility in applying the sequential test in accordance with the NPPF<sup>19</sup>; recognising that the particular market being met by the accommodation may influence the nature of the location chosen and the suitability of alternative locations, whilst also considering hotel allocations and existing planning permissions within and beyond Exeter's boundaries.

**DD18:***Planning permission for Hotel development will be granted in the city centre and at the quayside. Subject to commencement of works to substantially increase the capacity of conferencing facilities at Sandy Park, planning permission will be granted for a hotel comprising up to 120 bedrooms located within reasonable walking distance of this development. Elsewhere the sequential test will be applied.*

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<sup>19</sup> National Planning Policy Framework, 2012, paragraph 24.

## 5. SUSTAINABLE TRANSPORT

Sustainable Community Strategy themes:

**An accessible city**  
**A city that cares for the environment**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 5: Achieve a step change in the use of sustainable transport**  
**Objective 7: Promote development that contributes to a healthy environment**  
**Objective 8: Provide infrastructure to deliver high quality development**

Core Strategy Policy:

**CP9: Strategic Transport Measures**  
**CP18: Infrastructure**  
**CP19: Strategic allocations**

### Background

The successful delivery of sustainable growth is dependent on the provision of adequate transport infrastructure. The economic strength of the city, and the quality of life it has to offer, depends very much on the accessibility, speed, quality and cost of transport. Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives (NPPF, paragraph 29). They also support the Council's efforts to improve air quality<sup>20</sup>, including preparation of a Low Emissions Strategy, aimed principally at transport based emissions.

### Land Safeguarded for the provision of transport infrastructure

The NPPF states that we should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice<sup>21</sup>. In order to bring forward the quantum of development envisaged in the Core Strategy significant new transport infrastructure is required. Strategic transport measures supported by a robust evidence base are listed in Policy CP9 and Policy CP19 of the Core Strategy. Some of these measures have land requirements that need be allocated to ensure delivery.

Land is safeguarded for the following schemes:

- New railway stations at:-
  - Marsh Barton on the Exeter to Plymouth line, to serve workplaces at Marsh Barton/Matford, particularly for commuters travelling from the Dawlish and Newton Abbot directions;
  - Newcourt on the Exeter to Exmouth line, to provide the strategic residential allocation with a rail link to the city centre and beyond, and to serve future employment development in the vicinity;
  - Hill Barton also on the Exeter to Exmouth line, to serve the western part of the Monkerton/Hill Barton strategic residential allocation as well as future employment development;
- A Park and Ride site at Ide/Alphington interchange to serve the A30 to the west, providing easier access to the city centre along the Alphington Road corridor;
- A new road link including an enhanced public transport route, from east of the M5 at Tithebarn Lane, westwards to Cumberland Way and (as a bus link) to Pinhoe Road; this

<sup>20</sup> See Chapter 8 - Environment

<sup>21</sup> National Planning Policy Framework, 2012, paragraph 41.



will provide a connection between developments to the east of the city, Monkerton, and the City Centre;

- The Exhibition Way road link, northwards across the railway to support new development at Ibstock Brickworks and Pinhoe Quarry and to relieve pressure on other roads in the Pinhoe area;
- The Water Lane road link to serve developments proposed in the Quay/Canal Basin area, and which could in future provide a higher quality bus link to Matford than the existing route via Tan Lane;
- The provision of an enhanced Bus Station to provide an efficient and welcoming arrival point and transport interchange, as part of a mixed use development to contribute to a vibrant and sustainable city centre.

It is vital that these transport infrastructure requirements are delivered in a timely manner in order to ensure development comes forward in a sustainable way. Policy DD19 safeguards land for essential transport infrastructure.

**DD19:** *The following sites and routes are safeguarded for transport infrastructure:*

- *Land for new stations at Hill Barton and Newcourt on the Exeter to Exmouth line and at Marsh Barton on the Exeter to Plymouth line*
- *Land for a park and ride site at Ide/Alphington interchange on the A30*
- *Land at Monkerton to provide a new road link and an Enhanced Public Transport Route*
- *Land at Eastern Fields for the Exhibition Way road link*
- *Land at Marsh Barton/Haven Banks for the Water Lane road link*
- *Land south west of Cheeke Street within the Grecian Quarter to provide an enhanced Bus Station*

The sites and approximate routes are shown on the draft Proposals Map.

## **Safeguarding Railway Land and Former Railway Land**

Some former operational railway land is identified in this plan as suitable for housing. However, the remaining land at Exmouth Junction, not allocated for housing, should only be released for non-transport related uses where it can be demonstrated, to the satisfaction of the local planning authority, that there is no demand for transport related uses. The operational railway land at Marsh Barton siding is also important for enabling access to the rail network and should therefore also be protected.

**DD20:** *Development will not be permitted on that part of the former railway land at Exmouth Junction not allocated for housing, or at Marsh Barton siding, which may prejudice the re-use of the land for other transport uses.*

Safeguarded railway land and former railway land is identified on the draft Proposals Map.

## **Accessibility and Sustainable Movement**

The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel (NPPF, paragraph 29). Objective 5 of the Core Strategy is to minimise the need to travel and reduce dependence on the car. The strategic allocations proposed by the Core Strategy Policy CP19 are designed to secure communities with their own local shops and community facilities, and the strategic transport infrastructure measures set out in Core Strategy Policy CP9 are intended to reduce reliance on the car to access jobs and services further afield. Policy CP18 of the Core Strategy will be used to secure developer contributions (through CIL and S106) needed to ensure the delivery of any transport infrastructure and/or services required as a result of the proposed development.

Individual developments must contribute towards objective 5 of the Core Strategy, by promoting a sustainable transport hierarchy that prioritises pedestrians, cyclists and public transport over private cars, whilst maintaining safe and efficient highway networks. Transport networks comprise roads (including the strategic road network), pedestrian and cycle routes and public transport infrastructure and services. These networks need to serve the needs of all potential users including those with disabilities.

It will be important that development comes forward in a manner which ensures access to public transport right from the start. In the case of urban extensions and other large development areas, the first phases to be built should be those closest to existing transport routes. Routes can be extended or new services introduced as the development progresses and it becomes practical and viable to do so. This represents good planning practice consistent with NPPF paragraph 30 and should help promote sustainable ways of living.

Proposals with significant transport implications will need to include a transport assessment and a travel plan may also be required. The coverage and detail of a transport assessment will depend upon the scale of development and the extent of its transport implications.

Policy DD21 seeks to exploit opportunities for the use of sustainable transport modes<sup>22</sup> and aims to ensure that throughout all stages of the development process attention is given to minimising the need to travel and reducing the dependence on the car.

**DD21:** *Development, as appropriate to its location, scale and form, should:*

- (a) give priority to the needs of pedestrians, cyclists and users of public transport over private motorised vehicles;*
- (b) provide safe, sufficient and convenient means of access to existing and proposed transport networks, without conflicting with the existing function or safety of those networks;*
- (c) be phased so that early development is as close as possible to existing public transport services, walking and cycle routes, then progress in such a way that bus, walking and cycle routes can be extended into the development as it becomes practical and viable to do so; and,*
- (d) be supported by a travel plan that encourages the use of sustainable forms of movement.*

This Policy is supported by detailed advice contained in the Residential Design SPD, the Sustainable Transport SPD and the Green Infrastructure Strategy.

## **Parking**

The National Planning Policy Framework states that:

‘If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- The accessibility of the development
- The type, mix and use of development
- The availability of and opportunities for public transport
- Local car ownership levels; and
- An overall need to reduce the use of high-emission vehicles’.

The national maximum parking standards have been abolished. The Government believes councils and communities are best placed to set parking policies that are right for their area and based on local need.

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<sup>22</sup> National Planning Policy Framework, 2012, paragraph 35

Whilst it is recognised that in some instances Exeter's standards have imposed levels of parking below those sought by the developer, the Council considers that parking standards have had an important role in encouraging sustainable forms of development. Exeter's parking standards have been in place for some time and have been successfully used in the delivery of significant growth in the area, as well as providing a degree of certainty for developers.

The Council has reviewed its car and cycle parking standards for development in Exeter. It is proposed that the car parking standards will no longer be treated as maximum but will be used as a guide to the appropriate level of parking. In all cases, due regard will also be given to site specific circumstances. Minimum parking standards are retained for cycles and disabled users.

For residential development it will be vital that parking is integrated into the layout and design so that it does not dominate the environment. In order to accommodate the variation in car ownership between dwellings, developers should provide an appropriate ratio of allocated to unallocated parking, so as to reduce the impact of vehicles on the townscape. Off-street parking should be sufficient to prevent inappropriate on-street parking which can impede buses, pedestrians and cyclists.

Car free residential developments will be encouraged within the city centre, and may be appropriate in other locations which are well served by public transport.

Cycle hubs, which provide a range of cycle facilities (such as storage, changing facilities, showers, lockers etc) in one location, can motivate people to cycle to work, school and the shops. Cycle hubs will be encouraged in appropriate locations throughout the city where they would be easily accessible by various modes of transport and would serve local cycle networks.

For commercial development, Travel Plans can reduce the need for parking through encouraging the use of sustainable modes of transport and car sharing, coupled with measures to discourage car use such as charging for parking at workplaces.

**DD22: Development should:**

- (a) *provide an amount of car parking appropriate to the proposal and its location, and make appropriate provision for the parking of motorcycles and for the charging of electric vehicles;*
- (b) *integrate parking provision into the overall design of the development and ensure an appropriate ratio of allocated to unallocated parking, so as to avoid the creation of a car dominated environment;*
- (c) *provide safe and secure parking facilities that are subject to natural surveillance, with safe and convenient pedestrian links to their surroundings; and,*
- (d) *make safe, secure, sufficient and convenient provision for cycle parking and storage in all development and providing showers, lockers and drying space where more than 20 people are employed.*

Further guidance on the implementation of this policy and the standards that will be used to determine an appropriate level of car and cycle parking are contained in the Sustainable Transport SPD. In terms of residential development, the Council's Residential Design SPD gives detailed advice on the design and layout of car and cycle parking, and sets out the appropriate ratios of allocated to unallocated car parking.

## 6. MEETING COMMUNITY NEEDS

Sustainable Community Strategy themes:

**A learning city**  
**A city that is healthy and active**  
**A city of culture**  
**A city with strong communities**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 2: Develop the potential for economic and commercial investment**  
**Objective 3: Provide decent homes for all**  
**Objective 4: Provide and enhance retail, cultural and tourist facilities**  
**Objective 6: Meet community needs**  
**Objective 7: Promote development that that contributes to a healthy population**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policy:

**CP10: Meeting Community Needs**  
**CP18: Infrastructure**  
**CP19: Strategic allocations**

### Background

The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities<sup>23</sup>. It is important that the needs of the community are met in a sustainable manner that also promotes health and wellbeing. In developing a strategy to meet these needs it is important to have regard to the catchment areas for different facilities and the degree to which locations are served by public transport. It is also important to consider the contribution facilities may make to social inclusion and reducing deprivation.

Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities can be open spaces, allotments, and sport and recreation provision or other community facilities (such as schools, community halls, churches, libraries etc) that meet these needs. In accordance with the NPPF<sup>24</sup> it is vital to plan positively for the provision for community facilities. Core Strategy Policy CP10 protects existing facilities and requires new facilities to be provided in a timely manner. Policies CP18 and CP19 ensure that contributions are made to deliver these facilities and services.

Neighbourhood Planning is a new way for communities to decide the future of the places where they live and work and provides a powerful set of tools for local people to ensure they get the right types of development for their community<sup>25</sup>. Guidance regarding Neighbourhood Planning and the formation and designation of Neighbourhood Forums is available on the Council's website at [www.exeter.gov.uk/neighbourhoodplanning](http://www.exeter.gov.uk/neighbourhoodplanning).

### Open Space, Allotments, and Sport and Recreation Provision

Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities<sup>26</sup>. The city's existing sport,

<sup>23</sup> NPPF, 2012 (paragraph 69)

<sup>24</sup> NPPF, 2012 (paragraph 70)

<sup>25</sup> NPPF, 2012 (paragraph 184)

<sup>26</sup> NPPF, 2012 (paragraph 73)

leisure, public and private open spaces and allotments represent important assets serving the communities in which they are located and, in some instances, wider areas. This importance relates not only to their recreational function, but also to their health and amenity value, their biodiversity value, the contribution they make to the character of an area (by providing green corridors and a well-designed public realm) and their contribution to climate change mitigation and adaptation. These areas form an important part of the city's green infrastructure and if such facilities are lost to other uses, it can be extremely difficult to find alternative locations for provision.

Existing open space, allotment, and sport and recreation designations will, in most instances, be retained. However, since the Local Plan First Review 2005 the Council has adopted, or proposes to adopt, a number of new spaces, and these are shown on the Draft Proposals Map. In the future new areas will also be identified within the strategic allocations at Newcourt, Monkerton and Hill Barton and South of Alphington.

The NPPF has introduced a new Local Green Space designation. Local Green Space is an area of green space that is in reasonably close proximity to the community it serves, is demonstrably special to a local community, holds a particular local significance and is local in character and is not an extensive tract of land. Queen's Crescent garden, within St James ward, is designated as a Local Green Space by the Exeter St James Neighbourhood Plan.

Proposals involving the loss of open space, allotments, and sport and recreation facilities will be resisted unless the Council's assessment, or an independent assessment undertaken as part of the proposal, shows the facility to be surplus to requirements; this assessment must include consideration of all the functions that open space can perform. Alternatively, the proposal must result in equivalent or greater benefit to the community from the provision of suitable alternative facilities nearby (where the suitability of the alternative provision is assessed in terms of size, location, accessibility, relationship to neighbouring uses, safety, usefulness, attractiveness and quality).

New residential development will need to make adequate provision for open space, allotments, and sport and recreation as an integral part of the scheme. All proposals for new development will be assessed to determine what open space, allotment and sport and recreation provision is required, in line with standards set out in policy and the Open Space, Sport and Recreation SPD. This SPD will be informed by Natural England's accessible natural green space standards. The level and type of provision should be based upon a sound assessment of current and future needs, taking account of any local deficiencies. Provision should be made on-site as an integral part of the scheme. Where on-site provision is not appropriate, off-site provision or a financial contribution towards it will be sought. The financial contribution will be commensurate with the facilities required to serve the development.

***DD23:*** *All open space, local green space, allotment and sport and recreation facilities will be protected and enhancements to these areas will be supported. Any loss of these uses will only be permitted where:*

- (a) there is a proven excess of the facility in the area; or*
- (b) the community will gain equivalent benefit from the provision of suitable replacement open space, allotment, sport or recreation facilities nearby.*

*Any replacement provision must take into account the needs of the area and current standards of open space, sport and recreation provision, but should be equivalent to, or an improvement upon, the existing resource.*

*Proposals for new residential development will be required to provide new open space, allotments, sport and recreation facilities in accordance with standards set out in the Open Space, Sport and Recreation SPD. Facilities should be provided on-site as an integral part of the scheme.*

*Developers will make provision for the on-going management and maintenance of their open space, allotments, sport and recreation facilities, to standards that have been agreed with the City Council, unless arrangements are made for the transfer of these facilities to the City Council.*

Full details of the Council's requirements in relation to open space, allotments, sport and recreation will be set out in an Open Space, Sport and Recreation SPD. The Council's Planning Obligations SPD provides guidance on the obligations for the provision of open space, allotments and sport and recreation facilities.

Open space, allotments, sport and recreation facilities, and sports stadia are shown on the draft Proposals Map.

## **Other Community Facilities**

In addition to open spaces, allotments and sports and recreation facilities, the presence of many other community facilities (such as schools, community halls, pubs, churches, libraries etc) make an important contribution to quality of life through the provision of accessible services to meet recognised needs. As established in Core Strategy Policy CP10, the Council supports the development of new community facilities and the retention of existing ones, to help create mixed and sustainable communities.

However, there may be specific cases where the loss of a facility is justified. The loss of a facility may be appropriate where there is no longer a demand for the facility and therefore it is not viable. Applications will need to include evidence of non-viability. Where a use is not viable it will also be necessary to demonstrate that an alternative community use is not viable. In any other case where the loss of a community facility is proposed, provision for a replacement facility, that is of at least equivalent standard and conveniently located for the community it serves, must be made in accordance with an agreed timetable that avoids any significant break in use.

Major new residential development will need to make adequate provision for community facilities as an integral part of the scheme. All proposals for major new development will be assessed to determine what type and quantum of community facilities should be provided. The level and type of provision should be based upon a sound assessment of current and future needs, taking account of any local deficiencies and the findings of the Council's Community Facilities Audit. Provision may be on or off site, depending on the nature of the development.

The NPPF states that within large-scale developments primary schools should be located within walking distance of most properties (NPPF, paragraph 38). To meet this requirement three primary school sites are allocated within the strategic allocations at Newcourt and Monkerton/Hill Barton.

**DD24:** *Proposals involving the loss of land or buildings in community use will only be permitted where:*

- (a) there is no reasonable prospect of the existing use continuing on a viable basis, nor of securing a satisfactory viable alternative community use; or*
- (b) a satisfactory replacement facility is provided, in a suitably convenient location for the community served, to a timescale that avoids any significant break in use.*

*Proposals for major new residential development will be required to provide community facilities commensurate with the scale of development. Account will be taken of the level of existing provision and an assessment made of new facilities required as a result of the proposed development.*

The primary school sites at Newcourt and Monkerton/Hill Barton are shown on the draft Proposal Map.

## **Assets of community value**

The NPPF requires planning policies to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community ability to meet its day-to-day needs (NPPF, paragraph 70).

Communities now have the opportunity to identify a building or land which is important to their social well-being, and bid for it if it comes up for sale. Across the city there are buildings and amenities that are important to the communities that use them. These could include, for example, a shop, a pub, or a library. The closure or sale of these places can sometimes damage communities. Under the Localism Act, voluntary and community organisations can nominate an asset to be included on a list of "assets of community value" held by the Council.

The loss of these facilities can also result in additional trips by private car and access difficulties for less able or mobile residents. Policy DD25 means that if a building or land is listed by the Council as an 'asset of community value' its loss will not normally be permitted.

***DD25: Development involving the loss of an asset of community value will not be permitted unless the benefits of the proposal clearly outweigh the harm that would result from the loss of the asset.***

## 7. LOCALLY DISTINCTIVE PLACES

Sustainable Community Strategy themes:

**A city that cares for the environment**  
**A safe city**  
**A prosperous city**  
**A city of culture**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 2: Develop the potential for economic and commercial investment**  
**Objective 3: Provide decent homes for all**  
**Objective 7: Promote development that contributes to a healthy population**  
**Objective 8: Protect and enhance the city's character**  
**Objective 9: Achieve excellence in design**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policies:

**CP1: Providing for growth: Spatial Strategy**  
**CP13: Decentralised Energy Networks**  
**CP14: Renewable and Low Carbon Energy**  
**CP15: Sustainable Construction**  
**CP16: Green Infrastructure, Landscape and Biodiversity**  
**CP17: Sustainable Design**  
**CP18: Infrastructure**  
**CP19: Strategic allocations**

### Background

The design of the city and its constituent parts is critical to the long term economic and cultural health of the city. 'Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people'<sup>27</sup>. Good design is important because it has a significant impact upon the well-being of residents and visitors, as well as upon the aesthetic appeal and environmental quality of Exeter. Creating and reinforcing local distinctiveness and raising the quality of urban living through excellence in design is a key objective of the Core Strategy.

### Design Principles

High quality design is important at every level of development. Good design is achieved by collaborative working between all the agencies and stakeholders involved in development of the city. Policy must seek to nurture this collaborative culture so as to create a virtuous circle of good design that leads to further high quality investment, enhancement and growth.

There is significant value in both protecting and enhancing what is of historic significance and policy must recognise the distinctive character of Exeter as an important historic city. However, it is equally important that new development creates distinctive places which may be seen as of townscape value and historic significance in the future.

Developers must consider all relevant design issues at the earliest possible stage and take a collaborative approach that involves all the parties necessary to achieve high quality, distinctive places.

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<sup>27</sup> National Planning Policy Framework, 2012 (Paragraph 56)



Policy DD26 ensures that planning permission will not be granted for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions (in accordance with the NPPF).

**DD26:** *Planning permission will be granted for development that:*

- a) *creates high quality distinctive places;*
- b) *ensures the location, layout and built form integrate well into the surroundings;*
- c) *includes a robust and long lasting landscape framework which takes advantage of existing landscape features;*
- d) *contributes to the provision of a compatible mix of uses which work well together to create vital and viable places;*
- e) *retains and refurbishes existing buildings of good townscape value;*
- f) *integrates measures to address climate change in ways which contribute to the character and appearance of the scheme;*
- g) *contributes to the delivery of the Exeter Green Infrastructure Strategy;*
- h) *creates or maintains a high quality public realm and makes provision, where appropriate, for public art as an integral part of the design;*
- i) *ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale;*
- j) *is visually attractive as a result of good architectural detailing and landscaping;*
- k) *uses high quality materials which weather well and which relate well to the palette of materials in the locality;*
- l) *retains and protects existing trees of good arboricultural and amenity value<sup>28</sup> and supports the planting of native trees in appropriate locations; and,*
- m) *integrates all service, utility, extraction systems and refuse facilities so that they complement the scheme and preserve landscape features including trees.*

A Design and Access Statement is required to be submitted with certain types of planning application and must show how a proposal has achieved good design in relation to policy and site context. In terms of residential development, this policy is supported by the Council's Residential Design SPD and the Householders Guide to Extension Design SPD. Where relevant applicants should also refer to the Trees and Development SPD and the Sustainable Transport SPD.

## **Designing out Crime**

Exeter is a comparatively safe city with low levels of crime. However, the personal and financial costs to those affected are significant, and the effects are widely felt and influence the perceptions people have about crime. Many people perceive crime to be a problem in Exeter and it is often listed as a top concern. This fear of crime can restrict people's lives, affect confidence in public agencies, and deter investment.

The 'Secured by Design' initiative requires proposals to 'design out' crime to create a safe and secure environment. Independent research shows that the principles of Secured by Design have been proven to achieve a reduction of crime risk by up to 75%, by combining minimum standards of security and well-tested principles of natural surveillance and defensible space.

**DD27:** *Planning permission will be granted for development that creates a safe and secure environment by:*

- a) *taking an integrated approach that ensures potential conflicts between security and other objectives are resolved;*
- b) *creating environmental quality and a sense of ownership;*
- c) *providing natural surveillance;*
- d) *achieving safe vehicular and pedestrian access routes;*

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<sup>28</sup> Including ancient trees.

- (e) providing suitable and managed open space that minimises crime and antisocial behaviour; and*
- (f) providing effective lighting that reduces crime and fear of crime.*

This policy is supported by the 'Secured by Design' initiative. Guidance is also provided in the Residential Design SPD and Sustainable Transport SPD.

## **Shop Fronts**

Shop fronts are essential to the character and image of Exeter and their design is of special importance, particularly in the city's historic areas.

The design of shop fronts and their associated signage and advertising can have a major impact in a particular locality. Each shop contributes to a streets overall character and quality and, ultimately, to the city as a whole.

***DD28: Planning permission will be granted for development that delivers shop fronts, and associated awnings and signs, that are in keeping with the character of the building and of the surrounding street scene.***

The proposed Shop Front Design SPD provides additional guidance on the implementation of this policy.

## **Conserving and managing heritage assets**

Exeter possesses a wealth of heritage assets and it is the quality and character of these that helps make the city a desirable place to live, work and visit. The maintenance and careful management of these assets is crucial to achieving sustainable development, attracting new commercial investment to the city, continuing development of Exeter as a centre for tourism and ensuring the conservation and enjoyment of the historic environment (NPPF, paragraph 126).

All heritage assets are finite resources that cannot be replaced. They can be vulnerable to damage or destruction, with irreversible loss of character and significance occurring either incrementally over time or as single events. Scheduled Monuments, Listed Buildings, Conservation Areas, Areas of Archaeological Importance, and Registered Historic Parks and Gardens are known as designated assets but there is also a category of non-designated assets which includes buried remains of varying importance and buildings and parks and gardens of local importance. It is important that the potential impacts on all these assets, whether designated or undesignated, are considered early on in the development of proposals.

Conservation Areas are areas of the city that have architectural or historic interest that must be conserved and enhanced. The Council's Appraisals and Management Plans seek to identify the distinct character of each area, including elements that are worthy of retention or enhancement and those that detract from the character which can and should be improved. Designation does not prevent or discourage new development, but is there to ensure attention is paid to high quality and appropriate design, repairs and maintenance, so that the distinct character of the area is retained. The Council will review the appraisals from time to time to ensure that they are updated to reflect the changing environment of the city and to maintain their relevance.

Listed Buildings contribute to the character, sense of identity, urban fabric and economy of Exeter; the designation covers both the inside and outside of buildings. The Council will seek to conserve what is significant about them, including their special architectural or historic interest, their settings and any special features of significance they possess, both internally and/or externally. Designation does not preclude new development and alterations, but is there to ensure that these

are done in a sensitive and appropriate manner, with the significance of the building and any important features it has being conserved and where possible enhanced.

The character and appearance of nationally Registered Historic Parks and Gardens must be conserved, enhanced where possible and sensitively managed.

Archaeological remains, as with all heritage assets, are finite resources. Exeter contains several nationally important archaeological sites which are designated as Scheduled Monuments and the historic core has been statutorily designated as an Area of Archaeological Importance (AAI). Separate consent is required (from English Heritage on behalf of the government) for works to scheduled monuments, as is separate prior notification to the Council for works within the AAI, including for those works normally covered by permitted development rights.

As well as designated assets and areas there are numerous other heritage assets of all types that, although currently possessing no national designation, do comprise an integral part of the city's environment and distinctive character. They can, on occasion, possess regional or national importance and are a material planning consideration when determining applications. These include numerous archaeological remains of varying importance throughout the city district which, where known, are recorded on the city and county historic environment records (HERs). Those non-designated buildings and parks and gardens that are considered to be of at least local importance are included on the Council's 'List of Locally Important Heritage Assets'.

For any heritage asset, whether currently designated or non-designated and of whatever type, there is a need to identify the relative importance and particular significance of the asset and to reconcile this with the need for development and/or the particular form a development should take. The approach seeks to achieve, where possible, the retention, appropriate re-use, and enhancement of any heritage asset as part of a sustainable development. Where it is not possible to retain assets, or where there are substantial public benefits that outweigh the loss, provision needs to be made for appropriate recording prior to any alteration or destruction.

To enable this approach to be followed sufficient information on the relative and particular significance of all heritage assets affected by a proposal must be submitted in support of applications. Guidance is available from the Council and should be sought at the earliest opportunity, both on the scope of supporting information required and on other detailed considerations relevant when making planning applications affecting heritage assets.

***DD29: Development should conserve and enhance the historic environment of the city, whether comprising individual heritage assets, their settings, or historic areas. Development that affects the historic environment will be allowed provided it meets the following criteria, as they apply to the particular asset or area affected:***

- a) *A development proposal that affects a designated heritage asset must demonstrate how special regard has been given to conserving its particular significance, in the form of fabric, setting, character or appearance, and any features of special architectural or historic or archaeological interest that it possesses; and,*
- b) *For development that affects non-designated heritage assets, including buried remains and those on the List of Locally Important Heritage Assets, the presumption will be that the particularly significant elements of these assets, including physical form and setting, will where possible be conserved and enhanced.*

*Where it is not practicable or desirable to retain heritage assets in an unaltered form, whether these are designated or undesignated, provision for appropriate recording, analysis, reporting and archiving will be required in lieu of their destruction or alteration, to be undertaken by an appropriately qualified person or organisation in accordance with a scheme of works to be agreed in advance.*

Scheduled Monuments, Area of Archaeological Importance, Conservation Areas and Registered Historic Parks and Gardens will be shown on the Proposals Map.

The Archaeology SPG provides additional guidance on the implementation of this policy. Information on Listed Buildings and on undesignated heritage assets (including buried remains and items on the council's 'List of Locally Important Heritage Assets') is available from the City Council, from the city and county historic environment records, and from national portals such as Heritage Gateway.

## 8. ENVIRONMENT

Sustainable Community Strategy themes:

**A city that cares for the environment**  
**A safe city**  
**A prosperous city**  
**A city of culture**

Core Strategy Objectives:

**Objective 1: Mitigate and adapt to climate change**  
**Objective 2: Develop the potential for economic and commercial investment**  
**Objective 3: Provide decent homes for all**  
**Objective 7: Promote development that contributes to a healthy population**  
**Objective 8: Protect and enhance the city's character**  
**Objective 9: Achieve excellence in design**  
**Objective 10: Provide infrastructure to deliver high quality development**

Core Strategy Policy:

**CP1: Providing for growth: Spatial Strategy**  
**CP11: Pollution**  
**CP12: Flood Risk**  
**CP16: Green Infrastructure, Landscape and Biodiversity**  
**CP18: Infrastructure**  
**CP19: Strategic allocations**

### Background

The Environment is vital to the attraction of Exeter as a place to live, work and visit and hence to Exeter's economic prosperity. It is important that we continue to protect Exeter's landscape setting, its rich biological diversity and the wider environment.

### Protection of Landscape Setting Areas

The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes<sup>29</sup>. The hills to the north and west of the city, particularly the ridgelines, give Exeter a distinctive character. The strategic gap that separates Topsham from the main urban area, the land along the riverside and open areas within the city, all help to define the uniqueness of Exeter.

Exeter has seven Valley Parks which provide informal recreation to the public and are also of significant wildlife value. The Valley Parks are distributed throughout the city and their proximity to residents and business areas means that they can be visited at any time of day. As such, they contribute significantly to the quality of life offered in Exeter. An eighth Valley Park, the new 'Monkerton Ridge Park', is designated within the Monkerton/Hill Barton strategic allocation. This park will be in close proximity to many new residents and will help to meet their needs for informal recreation, as well as keeping a visually significant ridge free from development and contributing to the delivery of the Green Infrastructure Strategy.

The Valley Parks also contribute significantly to the city's landscape setting. The Local Plan is supported by the Exeter Fringes Landscape Sensitivity and Capacity Study, which appraises open countryside within and around Exeter, including the Valley Parks. The appraisal demonstrates that

<sup>29</sup> NPPF, 2012 (paragraph 109)

much of the land around Exeter is of intrinsic landscape merit. Open land also performs a variety of other roles, including the separation of Exeter from Topsham, maintaining distinct identities, enabling informal recreation, and providing tranquil areas. It contains high quality agricultural land and land of nature conservation importance. Overall, this land provides the landscape setting for the city as a whole and for local areas. It is the combination of these roles and qualities and their relationship with, and importance to, the population of the adjoining urban area, which establishes the unique nature of this land and merits its protection from inappropriate development.

Policy CP16 of the Core Strategy protects areas of particular landscape importance: the hills to the north and north west; Knowle Hill to the South West; the strategic gap between Topsham and Exeter; and the Valley Parks (Riverside, Duryard, Mincinglake, Ludwell, Alphington to Whitestone Cross, Savoy Hill and Hoopern). These areas, together with the new 'Monkerton Ridge Park', will be subject to the Landscape Setting Areas designation shown on the Proposals Map. This land is to be protected from development because of its intrinsic merit, its contribution to the distinctive landscape setting of the city and its role in preventing the coalescence of Topsham and Exeter.

Proposals for active outdoor recreation in Landscape Setting Areas will be dependent upon establishing that harm would not be caused to the character, amenity or function of the area.

Policy DD30 ensures that only appropriate development is permitted within the Landscape Setting Areas.

**DD30:** *Development within the Landscape Setting Areas will only be permitted where:*

- (a) *there is no harm to the distinctive characteristics and special qualities of the landscape setting of the City and the wider area; and*
- (b) *it does not contribute towards the urbanisation of these areas; and*
- (c) *it does not contribute towards settlement coalescence between Exeter and Topsham; and*
- (d) *it consists of a replacement dwelling or domestic extension or it is reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation, landscape, educational or biodiversity enhancement, or the provision of green infrastructure.*

The Landscape Setting Areas are shown on the draft Proposals Map.

## **Green Infrastructure<sup>30</sup>**

A Green Infrastructure Study and a Green Infrastructure Strategy have been produced for Exeter. The Study sets out a framework to link existing and planned communities through a coordinated and easily accessible Sustainable Movement Network, together with a Biodiversity Network that links green and blue (water) assets within Exeter and surrounding area. The GI Strategy provides guidance on specific projects<sup>31</sup> intended to enhance the Valley Parks and other Landscape Setting Areas as well as providing detailed guidance on frameworks for the strategic growth areas which are reflected in the Masterplans. The GI Strategy takes a joined up approach that allows linked benefits to be recognised.

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<sup>30</sup> Green Infrastructure (GI) is a network of high quality green and blue spaces and other environmental features; it includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors, allotments and private gardens. It can also include Historic Parks and Gardens and other historic assets (see policy DD29).

<sup>31</sup> Details of projects, including the Exe Riverside Valley Park project and the Clyst Meadows project can be found in the Exeter and East Devon Green Infrastructure Strategy (2009) available to view at: <http://www.exeter.gov.uk/index.aspx?articleid=13441>

It is important the existing green infrastructure is protected, that enhancements are made to existing green infrastructure where possible and that new green infrastructure is delivered in accordance with the Green Infrastructure Strategy.

Policy DD31 seeks to ensure that development takes a positive approach to protection, enhancement and delivery of Green Infrastructure:

***DD31: Development, as appropriate to its location, scale and form, must protect or enhance existing green infrastructure and must deliver new green infrastructure in accordance with the Green Infrastructure Strategy.***

## **Biodiversity and Geodiversity**

For its size, Exeter is rich in biodiversity. Internationally, nationally, regionally and locally important nature conservation sites in the city support a wide variety of wildlife species, including a number of rarities. The protection of these sites is essential and is inextricably linked to the city's attraction, sense of place, economy, tourism and general environmental quality.

Considerable work has been commissioned in respect of avoiding any impacts on the Exe Estuary SPA and other nearby European Sites from increased recreational disturbance due to new residential development. The agreed approach has three main principles; funding for the management of recreation on the Exe Estuary, the provision of suitable alternative natural greenspace and monitoring of impacts and effectiveness of measures. This work has also established an approach to collecting contributions from development (required by CP18 of the Core Strategy).

Areas of particular biodiversity and geodiversity importance need to be designated on the Proposals Map so as to ensure their protection. The Ramsar site, the Special Protection Area, the Special Area of Conservation, SSSIs, and Regionally Important Geographical/Geomorphological Sites all retain their existing boundaries. The Exeter Local Plan First Review also identified the location of Sites of Nature Conservation Importance (SNCI) and Sites of Local Interest for Nature Conservation (SLINC). Following a review of these sites most have been re-classified as County Wildlife Sites (a terminology commonly used by local authorities to refer to sites with conservation value at a County level).

The South West Nature map identifies Strategic Nature Areas which are blocks of land which are important for the conservation and expansion of important habitat types. Exeter's Biodiversity Enhancement Areas draw on this evidence to identify areas where there are local opportunities for biodiversity enhancement.

There are also a number of Regionally Important Geological and Geomorphological Site (RIGS) that are designated in order to recognise and protect important earth science and landscape features for future generations.

It is also important to protect and enhance the natural environment which is not designated, including sites of local biodiversity importance (which may be brownfield as well as greenfield sites). All new proposals should facilitate enhancement and realise the benefits of providing a net gain in biodiversity. In the case of protected species outside designated sites, favourable conservation status should be maintained. Reference should be made to the Exeter Biodiversity Reference Map, particularly in regard to identifying sites of local importance to biodiversity.

Exeter is a pilot for biodiversity offsetting. Biodiversity offsets are conservation activities that are designed to give biodiversity benefits to compensate for losses - ensuring that when a development damages nature (and this damage cannot be avoided) new, bigger or better nature sites will be created.

Policy DD32 expands upon elements of Core Strategy Policies CP16, CP17 and CP18 and provides criteria that need to be met in order to minimise impacts on biodiversity and geodiversity and where possible to provide net gains in biodiversity in accordance with the NPPF (paragraph 109).

**DD32:** *International Sites (Special Protection Area, Special Area of Conservation and RAMSAR sites) benefit from statutory protection. Where development is likely to have a significant effect on an International Site (either alone or in combination with other plans or projects) an Appropriate Assessment will be required in accordance with the Conservation of Habitats and Species Regulations 2010. The integrity of European Sites must be maintained.*

*Development that is likely to have either a direct or indirect adverse effect on a Site of Special Scientific Interest (SSSIs) will not be permitted unless the benefits of the development clearly outweigh both the impacts on the features of the site and any broader impacts on the national network of SSSIs.*

*Development that is likely to have either a direct or indirect adverse impact on a County Wildlife Site, a Biodiversity Enhancement Area, a Regionally Important Geological/Geomorphological Site or any other area of local importance to biodiversity or geodiversity will only be permitted if:*

- (a) the need for the development is sufficient to outweigh nature and/or geological conservation considerations;*
- (b) the extent of any damaging impact is kept to a minimum and appropriate mitigation and compensatory measures are implemented; and,*
- (c) it can be demonstrated that there are no reasonable alternative sites.*

*Development will be required to:*

- (a) contribute towards measures to avoid or mitigate adverse effects on the Exe Estuary and other International Sites and to implement the Green Infrastructure Strategy;*
- (b) in the case of protected species outside designated sites, favourable conservation status must be maintained;*
- (c) restore, conserve and enhance wildlife habitats, corridors and any other features of ecological interest including those related to protected species;*
- (d) ensure that disturbance to wildlife is kept to a minimum during construction;*
- (e) wherever possible result in an improvement to the biodiversity value of the site, incorporating biodiversity features into buildings and landscape; and,*
- (f) where necessary provide mitigation to ensure a net biodiversity gain for the Exeter area.*

Many sites of importance for biodiversity and geodiversity are shown on the draft Proposals Map. The Exeter Biodiversity Reference Map is helpful in identifying sites of local importance to biodiversity.

## **Local Energy Networks**

To support the move to a low carbon future Policy CP13 of the Core Strategy sets out the Council's approach to establishing decentralised (or local) energy networks. The policy refers to existing or proposed networks but does not identify these.

The carbon budgets set by Government for the period to 2030 are intended to reduce carbon emissions nationally by 60% by 2030. The strategy for carbon reduction has a significant number of components. A key contributor is low carbon energy generation which makes much more efficient use of energy inputs than centralised power generation in a limited number of very large power stations. On average, centralised power generation is only 30% efficient, whereas decentralised generation is typically twice as efficient.



The greatest efficiencies can be achieved through linking Combined Heat and Power (CHP) plants or Energy from Waste (EfW) plants, to local energy networks. These provide heat and electricity by burning gas, biomass or waste material and distribute the heat via a heat network. The City Council's policy is to ensure that developers use their best endeavours to help deliver CHP plants and heat networks in areas of major new development. To this end, the City Council has already identified three areas where the scale of development or the heat use opportunities are sufficiently great to justify the planning, design and delivery of heat networks.

Policy DD33 identifies those areas where existing evidence suggests local energy networks are feasible and viable and therefore networks are proposed in these areas. The policy also requires that new development outside these areas but in reasonable proximity to a network is constructed so as to allow connection (as and when a network is rolled out).

**DD33** *Local energy networks are proposed at the following areas:*

- a) *Monkerton and Hill Barton;*
- b) *The City Centre, Heavitree Road and Wonford;*
- c) *Marsh Barton, Matford, and land South of Alphington; and,*
- d) *In other locations across the City where it is shown that it is feasible and viable to bring forward a local energy network.*

*Within these areas, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.*

*Throughout the city, from the point when there is a contractual commitment for any element of a local energy network, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, that is within 500 metres of that element of the network, must be constructed to have heating (water and space) systems compatible with the local energy network and include pipework from those in-building systems up to the appropriate site boundary to allow connection to the network when available.*

*Throughout the city, where there is evidence that it is viable and feasible to connect development to any existing network, any large-scale residential or non-residential development<sup>32</sup> must be constructed to have heating (water and space) systems that will be compatible with a local energy network and include pipework from those in-building systems up to the appropriate site boundary to allow connection to a network.*

In areas (a) and (c) above (and any other areas identified subsequently (d)) any Local Energy Networks being established adjacent to the City Council's boundary will take account of development proposals in an adjacent authority and be planned and delivered so that a single Energy Network is provided, where that is appropriate and viable.

The local energy networks currently proposed (labelled A-C) are shown on the draft Proposals Map.

## **Flood Risk**

Policy CP12 of the Core Strategy sets out the Council's approach to flooding and the use of Sustainable Urban Drainage Systems (SUDs).

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<sup>32</sup> Large scale development is defined by the Government as non-residential development having a floorspace greater than 10,000 square metres or site area greater than 2ha and residential development comprising two hundred or more dwellings or with a site area greater than 4 hectares.

Exeter's spatial strategy directed development to those areas at least risk of flooding and sought to avoid those areas at higher risk of flooding. None of the strategic allocations involve development on land at high flood risk. However, in order to achieve the regeneration of the Water Lane Area the Core Strategy supports residential development subject to flood risk being addressed through design and site layout. Furthermore windfall sites may come forward in areas that are at a higher risk of flooding. Therefore, it will be imperative that every application for development or change of land use is assessed in terms of the potential flood risk.

Policy DD34 indicates how the Council will consider flood risk. In Flood Zone 3 the risk of flooding should be recognised as a key constraint to development. New development or regeneration should be seen as an opportunity to make space for water and hence reduce the causes and impacts of flooding in accordance with the NPPF (paragraph 100).

***DD34:*** *In areas at risk of flooding, development will only be permitted where it is demonstrated that the proposal meets the sequential test and, where appropriate, the exception test. In Flood Zone 3 residential development will only be permitted where it meets the sequential test and the exception test and also contributes to reducing the overall flood risk.*

Developers will be encouraged to enter into early discussions with the Council, Devon County Council (as Lead Local Flood Authority) and the Environment Agency.

## **Pollution and Contaminated Land**

Development has the potential to result in pollution to air, water or land, and development can be adversely affected by existing pollution. It is important to ensure levels of pollution are kept to a minimum and are acceptable to human health and safety, the environment and the amenity of adjacent or nearby land users. Environmental Health legislation regulates many forms of pollution, but it is clearly preferable to ensure new development is appropriate for its location and hence prevent conflict arising in the first place. In this way unacceptable risks from pollution can be prevented in accordance with the NPPF (paragraph 120).

Air quality in Exeter is generally good, but monitoring of nitrogen dioxide has resulted in the designation of an Air Quality Management Area (AQMA) along major roads. The AQMA is shown on the Core Strategy's key diagram. Measures to reduce pollution and meet air quality objectives in the AQMA will be brought forward through the County Council's Local Transport Plan and the City Council's Air Quality Action Plan. The City Council has also begun to produce a Low Emissions Strategy, principally aimed at reducing transport based emissions. Development should support and not be detrimental to delivery of these plans. The effects of development (including cumulative impacts) and existing pollution levels should be taken into account when deciding whether new development is appropriate for its location.

Exeter is crossed by a number of water courses. New development must not have an adverse impact upon water quality for example by an increase in sewage effluent discharge or mobilisation of contamination within ground or surface waters. The Council will support initiatives that result in an improvement to water quality (as required by the European Union Water Framework Directive).

Light and noise pollution arising from new development or affecting new development can individually and cumulatively have a damaging impact upon people's health, living environments and wildlife. Whilst lighting is desirable for safety, recreation and the enhancement of some buildings, inappropriate lighting can cause sky glow, nuisance and light trespass and wastes energy. Inappropriate levels of noise can affect people's use and enjoyment of their homes, their ability to work or learn and their health.

Land contamination is also a key consideration as it causes harm to the environment, has the potential to affect public health and safety and, unless dealt with appropriately, can inhibit the re-

use of otherwise suitable sites and cause property blight. . It is important that potential contamination is identified at the earliest stage in the process to ensure that appropriate remediation measures are identified and incorporated into the scheme. Remediation should remove unacceptable risk and make the site suitable for its new use. Additional advice for developers on the process for assessing contaminated sites and information on remediation works is set out in the Council's Contaminated Land Strategy. As explained in this Strategy, voluntary remediation (particularly through development) will be encouraged as a means of dealing with any contamination legacy.

Policy DD35 sets out the criteria against which development proposals will be considered.

***DD35: All development proposals should minimise and where possible reduce emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in air and water quality. Development proposals should not expose receptors to unacceptable levels of pollution, or result in poor standards of amenity. All applications for development must contain sufficient information to enable the Council to make a full assessment of potential pollution and hazards.***

*Proposals will only be permitted:*

- (a) *where, individually or cumulatively, there are no unacceptable impacts on:*
- *the natural environment and general amenity;*
  - *public health and safety;*
  - *air quality;*
  - *ambient and background noise levels;*
  - *surface and ground water quality;*
  - *land quality and condition; and*
  - *the need for compliance with statutory environmental quality standards; or*
- (b) *in exceptional cases, where it can be clearly demonstrated that the environmental benefits of and the wider social and economic need for the development outweigh any adverse impact in terms of pollution. In such cases, where pollution is unavoidable, mitigation measures to reduce pollution levels will be required in order to meet acceptable limits.*

*New development will not be permitted where there is potential for conflict to arise with existing polluting developments and where the issues cannot be effectively addressed by conditions, where the mitigation proposed would result in unacceptable development, or where the development would place unreasonable restrictions on the future development of existing business.*

*Development proposals on contaminated land (or where there is reason to suspect contamination) must include an assessment of the extent of the contamination and any possible risks. Proposals will only be permitted where the land is, or is made, suitable for the proposed use.*

The Council encourages pre-application discussions where pollution is or might be an issue. Developers need to demonstrate prior to determination that it is technically and economically viable to resolve any issues and that the resulting development will have, or will result in, a satisfactory standard of amenity and no unacceptable risks to human health or the environment will remain. This will need to involve adequate assessment by a competent person.

Traffic during the construction and operational phases of development can also have adverse impacts and it may be necessary to submit a Construction and Environmental Management Plan. For certain types of development an Environmental Impact Assessment (EIA) will be required to ensure that the environmental impacts are comprehensively considered.