

EXETER CITY COUNCIL**EXECUTIVE
30 SEPTEMBER 2008****REGIONAL SPATIAL STRATEGY 2006 - 2026 PROPOSED CHANGES****1.0 PURPOSE OF REPORT**

- 1.1 To agree a response to the 'Proposed Changes' to the Regional Spatial Strategy (RSS), published by the Secretary of State.

2.0 BACKGROUND

- 2.1 The draft RSS was published in June 2006. An Examination In Public (EIP) was held between April and July 2007. The recommendations of the Panel that held the EIP were published in December 2007 and reported to Planning Member Working Group on 5 February 2008 and Executive on 11 February 2008. Executive agreed that the response to the Government Office for the South West should outline concern that the Panel recommendations represented a significant shortfall on the identified housing requirements in the Exeter Housing Market Area, did not provide clear guidance on the direction of future strategic growth, and included an undeliverable proposal for a second new community north of Cranbrook.
- 2.2 Having considered the Panel recommendations, the Secretary of State has published Proposed Changes for consultation. These can be viewed at www.southwest-ra.gov.uk
- 2.3 A copy of the Proposed Changes and supporting documents is available in the Members Room.

3.0 PROPOSED CHANGES

- 3.1 The key elements are:
- total housing provision in the South West between 2006 and 2026 is proposed to increase from 23,000 per annum in the draft RSS to 29,623 per annum, a 29% increase, reflecting government policy and recent projections;
 - a partial review is proposed to commence as soon as possible in order to identify broad locations to meet longer term development needs;
 - housing provision in the Exeter area is significantly increased reflecting Exeter's role as a Growth Point, the strategy for the region of planning for growth in the most effective and sustainable way by concentrating development at the 'Strategically Significant Cities and Towns' (SSCT's), and the need to achieve closer alignment of homes and jobs;
 - provision within Exeter rises from 11,000 dwellings in the draft RSS to 15,000, an increase from 550 dwellings per annum to 750 per annum over the plan period.
 - the 15,000 dwellings within the City comprise 12,000 dwellings within the urban area, 2,500 dwellings to the east, and 500 dwellings south of Alphington;
 - housing requirements in East Devon and Teignbridge adjoining the

City increase from 7,500 in the draft RSS (6,500 Cranbrook, 500 Pinhoe, 500 Alphington) to 13,500 (7,500 Cranbrook, 4,000 east of the City, 2,000 Alphington);

- the total rate of development for the Exeter area will be 1,425 dwellings per annum – compared to around 600 dwellings per annum (all within the City) in recent years;
- the regional target for affordable housing is 35% of all housing development;
- housing densities should be 40-50 dwellings per hectare (net) within the City and 50 plus dwellings per hectare (net) in any urban extensions;
- in the period up to 2011, provision should be made for twelve residential pitches and five transit pitches for gypsies and travellers – this is unchanged from the Panel Report. Sites should, however, be allocated to meet longer term requirements, effectively requiring a total of 22 permanent pitches by 2026 – these figures approximate to those presented to PMWG in January 2008;
- the provision of 40 hectares of employment land within the City and 100 hectares with Exeter and East Devon is unchanged. The provision of a further 20 hectares within Exeter, East Devon and Teignbridge is now clarified as entirely within East Devon – as capacity within the City is limited, this does not affect provision to be made through the Core Strategy;
- the settlement hierarchy recommended by the Panel that placed Plymouth at a higher level than Exeter is now in a form that does not differentiate between them;
- the need for action to improve accessibility and movement between Cranbrook and Exeter City Centre and between the south west of the City and the City Centre is highlighted – to be achieved through demand management measures, sustainable travel measures and, if necessary, targeted infrastructure improvement to unlock pinch points;
- the detailed infrastructure proposals for each sub-region are, however, deleted because of concerns about the practicality, priority, feasibility and acceptability of the projects identified;
- policy on sustainable construction, which sought to move ahead in advance of building regulations, now seeks to meet the national timetable for reducing carbon emissions;
- guidance on renewable energy has been amended to set an interim target of 10% of energy to be used in major new development to come from decentralised and renewable or low-carbon sources in accordance with national guidance.

4.0 COMMENT

Housing

- 4.1 The Proposed Changes deal with the shortfall in housing provision for the Exeter Housing Market Area not addressed by the Panel recommendations. The increase in the housing numbers for Exeter to 15,000 does, however have significant implications. The draft RSS proposal for 11,000 dwellings in Exeter was a result of a detailed assessment of the capacity of the City. The Panel who held the EIP recognised that “The further expansion of the City is constrained by topography, flood plains and environmental factors to the north, west and south”. The Panel also said that “The urban fabric of the City does not

include large areas of vacant and derelict land". As a result, the Panel recommended a limited increase from 11,000 to 12,000 dwellings.

4.2 The Council's emerging Core Strategy envisaged that the 12,000 requirement would be met as follows:

Planning permissions and allocations	3,500
New sites on previously developed land	1,000
Monkerton/Hill Barton/Newcourt	4,000
South of Alphington	500
Unidentified sites (Urban Capacity Study)	3,000
Total	12,000

4.3 The further increase to 15,000 dwellings and its distribution, proposed by the Secretary of State, is of concern. The provision of 2,500 dwellings to the east is presented in the Proposed Changes as an "increase" in order to "respond to representations in terms of land available for development". However all of the greenfield land to the east (i.e. Monkerton/Hill Barton and Newcourt) is taken into account in meeting the draft 11,000 dwelling requirement and in meeting the Panel 12,000 dwelling recommendation. The capacity in 4.2 above suggests that 4,000 dwellings may be possible at Monkerton/Hill Barton and Newcourt, based on taking into account the various constraints. This exceeds the RSS provision by 1,500 dwellings. In summary, the 2,500 "increase" does not relate to any new land and, in effect, represents a reduction in potential provision.

4.4 The consequence of reducing greenfield capacity is that even greater pressure is placed on previously developed land. As noted in 4.2 above, the provision in response to the Panel's 12,000 target includes reliance on 3,000 dwellings on unidentified sites within the built up area. Combined with the additional 3,000 dwellings required to meet the 15,000 target and the 1,500 reduction in capacity to the east, this means that reliance now must be placed on 7,500 dwellings to come forward over the plan period on land that cannot currently be identified.

4.5 Government guidance states that no allowance should be made for unidentified sites unless there is robust evidence of genuine local circumstances that prevent specific sites being identified. The consequence of the Proposed Changes is that the ability to identify sites falls far short of the proposed target. In these circumstances a case can be made for the inclusion of an allowance for windfalls but the required 375 dwellings per annum from this source seems unlikely to be achieved.

4.6 The only greenfield alternatives that remain are the Valley Parks, the hills to the north, and land around Topsham, east of the motorway. All of these fall outside the potential development areas identified by the Proposed Changes.

4.7 The only other alternative is increased densities but the estimates of capacity set out above are based on achieving densities that are already in line with RSS guidance.

Housing provision adjoining the City

- 4.8 The proposed 4,000 dwellings to the east of the City replaces the Panel's site specific recommendation for a second new community immediately north of Cranbrook. Transport consultants for the County Council are assessing the options, including an urban extension at Pinhoe and land east of Junction 30.
- 4.9 To the south west the 500 dwellings proposed within the City south of Alphington is unchanged but the 500 dwellings proposed south of the city boundary in this area, within Teignbridge, is increased from 500 dwellings to 2,000.
- 4.10 The proposals to the east and south west will have significant implications for the City in terms of transport, education, social and community infrastructure provision and the need for joint working. In particular, any transport links between the new communities and the city may have to be safeguarded as part of development proposals within the city boundary.

Partial Review

- 4.11 The proposals for a Partial Review, to be carried out by the Regional Assembly, is in response to the latest household projections that suggest the current housing requirements may have to be increased still further. The intention is to complete the review by 2010, to tie in with the Regional Development Agency taking on the responsibilities of the Regional Assembly. It is of concern that, in consequence, proposals for development will be coming forward through Core Strategies and other Local Development Framework documents just as the housing requirements change.

Infrastructure

- 4.12 The detailed sub regional infrastructure proposals in the draft RSS have been deleted with the intention that they will be replaced by robust proposals that have been subject to vigorous assessment, prioritisation and testing. It is understood that this will be carried out through the Government Office for the South West, Regional Development Agency, Regional Assembly and other stakeholders, as a matter of priority and that the proposals are likely to be included in the Implementation Plan to accompany the RSS. It is clearly essential that realistic and deliverable proposals for infrastructure provision are re-instated as soon as possible.

5.0 PLANNING MEMBER WORKING GROUP

- 5.1 The Proposed Changes were considered by Planning Member Working Group on 19 August 2008. Members expressed concern that the Secretary of State had understated the housing capacity on the eastern side of the City and, significantly overstated the capacity on previously developed land within the built up area.

6.0 RECOMMENDATION

6.1 It is recommended that representations be made on the Regional Spatial Strategy Proposed Changes as follows:

- (i) the increase in the number of houses to be provided within the City is not soundly based on evidence of capacity;
- (ii) the provision of 2,500 dwellings on the eastern side of the City should be deleted as it limits the potential capacity to be achieved in this area and unnecessarily restricts the flexibility to determine the optimum balance of development within the City, in response to RSS requirements, through the Local Development Framework, and
- (iii) the work to identify detailed and realistic sub-regional infrastructure proposals and priorities, that will enable the delivery of the RSS development requirements, should be carried out as a matter of urgency.

**RICHARD SHORT
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ECONOMY AND DEVELOPMENT DIRECTORATE

Local Government (Access to Information) Act 1985 (as amended)
Background Papers used in compiling the report:
None