

REPORT TO STRATEGIC SCRUTINY COMMITTEE

Date of Meeting: 14 November 2024

Report of: Strategic Director for Place

Title: Exeter Plan Publication

Is this a Key Decision?

Scrutiny is a non-decision-making committee.

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1. The report sets out the progress made on the Exeter Plan since the last Strategic Scrutiny discussion in March 2024 and explains the next stages in progressing the plan.

2. Recommendation:

2.1. That the work undertaken on the Exeter Plan, and the next stages in its preparation, are noted and discussed.

3. Reasons for the recommendation:

3.1. To provide an opportunity to reflect on the preparation of the Exeter Plan.

4. What are the resource implications including non-financial resources?

4.1. There are no resource implications of the recommendation to note and discuss the work undertaken on the Exeter and its next stages; budgets for the Exeter Plan were set in 2020.

5. What are the legal aspects?

5.1 When preparing the Exeter Plan (a Local Plan), the Council must comply with the requirements of the Planning and Compulsory Purchase Act 2004, as well as the provisions set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The work being undertaken continues to adhere to these legal requirements.

6. Report details:

Background

6.1 The City Council has been working on the Exeter Plan since 2020. The work has included preparation of evidence, site assessment, policy writing and liaison with stakeholders and partners.

6.2 Significant efforts have been to engage with the public and other interested organisations throughout the preparation of the plan to date. This has included three public consultations:

- Issues consultation: September to November 2021
- Outline Draft Plan: September to December 2022
- Full Draft Plan: October 2023 – January 2024

The analysis of the consultations has been fed back to Members via meetings of the Strategic Scrutiny Committee and Executive as appropriate.

Progress since the Full Draft Plan consultation

6.3 The Full Draft Plan consultation ended in January 2024. Analysis of the responses was reported to Strategic Scrutiny Committee in March 2024 and Executive in April 2024.

6.4 Since the analysis of the Full Draft Plan consultation responses, the local plans team has been focusing on progressing the plan towards its next key milestone; the Publication Draft Plan which will comply with Regulation 19 of the Planning and Compulsory Purchase Act 2004.

6.5 Work has continued to include evidence gathering. Additional evidence which is currently being prepared and is informing the Publication Draft Plan is listed below. When concluded this will be added to the evidence base for the plan.

- Local housing needs assessment update;
- Gypsy and traveller accommodation assessment;
- Student housing needs assessment;
- Viewpoints, density and heights study;
- Strategic flood risk assessment level 1 and 2;
- Emergency access and egress study;
- Embodied carbon evidence;
- Evidence relating to delivering adaptive and resilient development;
- Heat network study;
- Evidence for built sports facility strategy;
- Updated transport modelling;
- Updated infrastructure delivery plan;
- Sustainability Appraisal;
- Habitats Regulation Assessment; and
- Viability appraisal.

Member engagement

6.6 In order to ensure ongoing involvement of Members in the preparation of the plan and to provide regular opportunities to feed into the process, the local plans team has provided near monthly presentations to the Planning Member Working Group throughout 2024. These discussions have covered all chapters in the plan.

- January 2024: Spatial strategy (overarching policy direction);
- March 2024: Homes;
- April 2024: Economy and jobs;
- May 2024: Natural environment;
- July 2024 (1): Sustainable transport and communications;

- July 2024 (2): Heritage and culture;
- August 2024: Climate change;
- September 2024: High quality places, health and infrastructure; and
- October 2024: Planning reforms, housing requirements and site allocations.

6.7 These meetings were open to all Members and, for the discussions on the Exeter Plan, all Members were able to ask questions.

Plan updates

6.8 The Exeter Plan is currently being updated to take account of the consultation responses, new evidence, additional site assessments, stakeholder discussions and Members' feedback. Various assessments of the emerging plan content are also currently underway. The writing of the Publication Draft Plan is not yet completed and so it is not possible to present it here, however there are some revised elements to note.

Plan period

6.9 Previous versions of the Exeter Plan have covered the years 2020 to 2040 (2020/21 – 2039/40). However, the National Planning Policy Framework (NPPF) sets out that plans should have a further 15 years to run on their adoption.

6.10 On this basis, the plan period for the Exeter Plan will move forward by one year to 2021 to 2041 (2021/22 – 2040/41).

6.11 This change will ensure that the plan period accords with national policy but also that it will have a post-adoption lifespan of one extra year.

Housing requirements

6.12 The Government sets a formula for local authorities to calculate the minimum number of homes that should be built in an area each year in order to meet local needs. Based on this formula, the City Council must plan for at least 642 new homes to be built in Exeter each year.

6.13 During the summer the Government consulted on national planning reforms covering revisions to the NPPF and revised housing requirements for each local authority. Under these proposals, the housing requirement for Exeter could increase to 815 homes per year.

6.14 However, because the City Council is currently progressing towards the Publication Draft Plan in December, we will continue preparing the Exeter Plan under transitional arrangements which mean the current NPPF and existing housing requirements – the 642 homes per year.

6.15 To accommodate 642 homes annually over 20 years means an overall requirement of at least 12,840 homes. However, to allow for choice and competition in the housing market and to ensure that the Exeter Plan will be resilient to uncertainties such as a delay in developing a particular site or changes to housing needs or Government policy, it is necessary to include headroom in the overall housing requirement. This means that the

plan will provide for just over 14,000 homes. When completions, commitments and windfalls are taken into account around 5,400 homes will be required on new allocations.

Spatial strategy

6.16 The first policy in the Exeter Plan is policy S1: Spatial Strategy. This policy sets out the key principles behind how the city will evolve over the plan period and the nature of development.

6.17 Policy S1 covering the Spatial Strategy has been updated following the Full Draft Plan. It retains a strong emphasis on brownfield development and now includes additional reference to:

- The economic role of the city in its wider functional catchment area;
- Further reference to development density in the context of local character and heritage;
- Stronger reference to enhancing biodiversity; and
- Climate change adaptation and resilience.

6.18 The updated policy is included below for information.

S1: Spatial strategy (Strategic policy)

The spatial strategy will deliver on Exeter's Vision 2040 and the city's ambitions for net zero, climate change adaptation and resilience, high quality development, health and wellbeing, the vitality of the city centre, the natural environment, heritage and cultural diversity. The City Council will work with partner Authorities and other stakeholders to deliver these ambitions.

The spatial strategy for delivering development in Exeter has 15 elements:

1. Providing good quality homes of a variety of types in the city to meet Exeter's various needs.
2. Working with neighbouring Councils to ensure that the employment needs of the wider functional economic area are met.
3. Enabling traditional and new forms of employment provision in the city, developing the transformational sectors and supporting improvements to education and skills to ensure employment needs are met.
4. Focusing the majority of development on strategic brownfield sites, particularly in locations close to the city centre to support its ongoing vitality and access to public transport hubs.
5. Enabling the development of smaller brownfield sites as they become available.
6. Considering modest greenfield development as a supplement to the overall focus on brownfield sites.
7. Providing high quality, mixed-use development at optimal densities appropriate to the characteristics, heritage and function of the local area to minimise the need to travel and maximise walking, cycling and public transport.
8. Locating development near enough to key services and facilities to allow residents to meet most of their daily needs easily on foot or inclusive equivalent.
9. Protecting the landscape value of the sensitive hills which provide the vital setting of the city.

10. Protecting and enhancing biodiversity throughout the city and improving the ecological value of the River Exe, its estuary and wildlife networks.
11. Conserving, enhancing and improving access to, and interpretation of, Exeter's outstanding historic environment.
12. Steering development to avoid areas of higher flood risk where possible and managing residual flood risk as appropriate.
13. Enabling development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement.
14. Reflecting local identities, providing for diverse neighbourhoods and delivering high quality public realm and community spaces to grow the city's cultural offer and drive regeneration.
15. Delivering the range of infrastructure and services needed in a timely manner to support high quality development and our communities.

The Exeter Plan Publication process

6.19 The Publication Draft of the Exeter Plan is scheduled to be considered by Executive on 3 December. Subject to approval, the Draft will be published in mid-December for a period of eight weeks. This timeframe meets statutory and City Council requirements.

6.20 It is important to note that the publication process is extremely tightly defined by statutory requirements. Although it is a public process into which anyone can provide input, it is not a consultation in the traditional sense. This will affect the way in which the publication process is organised.

6.21 A key part of the process is the way in which interested parties can provide responses to the plan. Responses, or representations as they are known, can only be provided in relation to whether it is considered that the plan is:

- Legally compliant;
- Sound; and
- In compliance with the duty to cooperate.

6.22 Soundness is also clearly defined in terms of specific tests which are set out in the NPPF. These are whether a plan is:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

6.23 This means there is no scope to ask open questions seeking general comments or to ask simple, more accessible survey-type questions which have been used to widen response rates for the earlier rounds of consultation. This will mean there will be significantly less engagement activity than has been organised previously.

6.24 It is also important to note that there is no requirement for the City Council to amend the plan itself following the Publication stage. Instead, the regulations require the City Council to submit the Publication Draft Plan and all the formal representations to the

Planning Inspectorate for formal examination. The potential to make amendments to the plan in response to the representations are usually considered through the examination process.

Steps after Publication

6.25 As alluded to above, the next stage of preparing the plan will be its submission to the Planning Inspectorate for Examination. The timetable for these stages of work is set out in the Local Development Scheme which was approved by Executive in September 2024.

- Submission to Planning Inspectorate: June 2025

Indicative timetable (determined by Planning Inspectorate)

- Examination including hearings: November/December 2025
- Adoption: November 2026

7. How does the decision contribute to the Council's Corporate Plan?

7.1. The recommendation in the report is that the work undertaken on the Exeter Plan, and the next stages in its preparation, are noted and discussed. No formal decision is sought. However, the content of the emerging Exeter Plan will support all five of the Council's strategic priorities through the Exeter Vision 2040, the overarching spatial strategy for the city and a series of specific thematic policies:

- Prosperous local economy;
- Healthy and active city;
- Housing & building great neighbourhoods and communities;
- Net zero carbon city; and
- Thriving culture and heritage.

8. What risks are there and how can they be reduced?

8.1. The recommendation is that the work undertaken on the Exeter Plan, and the next stages in its preparation, are noted and discussed. On this basis, there are no risks associated with the recommendation.

9. Equality Act 2010 (The Act)

9.1 No potential impact has been identified on people with protected characteristics as determined by the Act because the report is for noting only.

10. Carbon Footprint (Environmental) Implications:

10.1. There are no direct carbon/environmental impacts arising from the recommendation.

11. Are there any other options?

11.1. It is appropriate to note and discuss the work undertaken on the Exeter Plan, and the next stages in its preparation. There are no other options.

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Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

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