The Exeter Plan

This is our city • This is our future























Publication Plan: Regulation 19 December 2024

Draft for Executive







The Exeter Plan

2021-2041

Publication Draft - Regulation 19

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December 2024

Contents:

1.	Explaining the Exeter Plan	6
2.	Exeter: Ancient City – ambitious future	10
3.	This is our city, this is our future	12
4.	Spatial strategy	14
	S1: Spatial strategy (Strategic policy)	15
	S2: Liveable Exeter Principles (Strategic policy)	
	Climate change	
	CC1: Net zero Exeter (Strategic policy)	22
	CC2: Renewable and low carbon energy (Strategic policy)	
	CC3: Local energy networks (Strategic policy)	24
	CC4: Ground-mounted photovoltaic arrays	25
	C5: Future development standards (Strategic policy)	
	CC6: Embodied carbon	26
	CC7: Development that is adaptive and resilient to climate change	28
	CC8: Flood risk (Strategic policy)	
	CC9: Water quantity and quality	
6.	Homes	
	H1: Housing requirement (Strategic policy)	32
	H2: Housing allocations and windfalls (Strategic policy)	33
	H3: Regeneration opportunity areas (Strategic policy)	34
	H4: Affordable housing (Strategic policy)	37
	H5: Build to rent	39
	H6: Co-living housing	41
	H7: Custom and self-build housing	43
	H8: Homes for older people	44
	H9: Supported housing	45
	H10: Purpose built student accommodation	47
	H11: Gypsy and Traveller accommodation	49
	H12: Residential conversions and houses in multiple occupation	50
	H13: Loss of residential accommodation	50
	H14: Accessible homes	51
	H15: Housing density and size mix (Strategic policy)	52
	H16: Residential amenity and healthy homes	53
7	. Economy and jobs	54
	EJ1: Economic growth (Strategic policy)	57

	EJ2: Retention of employment land (Strategic policy)	58
	EJ3: New forms of employment provision (Strategic policy)	58
	EJ4: Access to jobs and skills	59
	EJ5: Provision of local services in employment areas	60
	EJ6: New transformational employment allocations (Strategic policy)	62
8	. Retail and the future of our centres	63
	RFC1: The future of our centres (Strategic policy)	64
	RFC2: Development in, and affecting, our centres (Strategic policy)	67
9	. Sustainable transport and communications	69
	STC1: Sustainable movement (Strategic policy)	70
	STC2: The transport hierarchy (Strategic policy)	72
	STC3: Supporting active travel (Strategic policy)	73
	STC4: Supporting public transport (Strategic policy)	75
	STC5: Supporting more sustainable forms of car use	77
	STC6: Travel Plans	78
	STC7: Safeguarding transport infrastructure (Strategic policy)	79
	STC8: Motorway service area (Strategic policy)	80
	STC9: Digital communications (Strategic policy)	81
1	0. Natural environment	
	NE1: Landscape setting areas (Strategic policy)	
	NE2: Valley Parks (Strategic policy)	
	NE3: Biodiversity (Strategic policy)	88
	NE4: Green infrastructure (Strategic policy)	90
	NE5: Green circle	90
	NE6: Urban greening factor	91
	NE7: Urban tree canopy cover	92
1	1. History and heritage	93
	HH1: Conserving and enhancing heritage assets (Strategic policy)	97
	HH2: Conservation Areas	98
	HH3: Archaeology	99
	HH4: Heritage assets and climate change	100
	HH5: Conserving and enhancing Exeter City Walls	101
1	2. Culture and tourism	102
	C1: Protecting and enhancing cultural and tourism facilities (Strategic policy)	106
	C2: Development and cultural provision (Strategic policy)	106
1	3. High quality places and design	107
	D1: Design principles (Strategic policy)	109

D2: Designing-out crime	110
D3: Advertisements	111
14. Health and wellbeing	112
HW1: Health and wellbeing (Strategic policy)	114
HW2: Environmental quality, pollution and contaminated land	116
15. Infrastructure and facilities	118
IF1: Delivery of infrastructure (Strategic policy)	120
IF2: Viability (Strategic policy)	121
IF3: Community facilities (Strategic policy)	123
IF4: Open space, play areas, allotments and sport	
IF5: New cemetery provision	127
16. Site allocations	128
Map of allocations	130
Strategic mixed use brownfield allocation: SBA1 - Water Lane (Strategic policy)	132
Strategic mixed use brownfield allocation: SBA2 - East Gate (Strategic policy)	136
Strategic mixed use brownfield allocation: SBA3 - Red Cow (Strategic policy)	139
Strategic mixed use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic policy)	
Strategic mixed use brownfield allocation: SBA5 - South Gate (Strategic policy)	145
TI1: Topsham Infrastructure Delivery Framework: (Strategic policy)	148
17. Monitoring and implementation	149

1. Explaining the Exeter Plan

What is the Exeter Plan?

- 1.1 The Exeter Plan will shape the future of Exeter for the next twenty years up to 2041 and will be the basis for how the city continues to evolve and meet the needs of the community.
- 1.2 The Exeter Plan is the Local Plan for Exeter. It will be the main planning policy document for the city, setting out where development should take place and providing the policies which will be used in making decisions on planning applications. Once adopted, it will replace the current planning policies in the Core Strategy (adopted 2012) and the Local Plan First Review (adopted 2005).

How have we got here?

- 1.3 The City Council started work on the Exeter Plan in 2020. The Plan was launched in autumn 2021 with an Issues consultation which explained the key issues for the Plan to address and started to look at what the pattern of development in the city might look like in future. The next round of consultation was held on an Outline Draft Plan in late 2022, which presented a series of strategic planning policies and potential development sites. Then in October 2023 the City Council consulted on the Full Draft Plan. This provided a full set of draft policies and suggested site allocations.
- 1.4 Between January and December 2024 work progressed on further evidence and Plan drafting to produce this Publication Draft of the Exeter Plan.

What is the Publication Draft of the Exeter Plan?

- 1.5 The Publication Draft is the third version of the Exeter Plan. It builds on the previous Full Draft of the Plan and includes the vision, a revised set of topic based planning policies to be used to make decisions on planning applications and a series of development allocations for a mix of uses including housing and employment. It also includes a Policies Map which shows the extent of spatial designations and proposals contained within the Plan. The responses provided to the previous consultations have been used to revise the Plan.
- 1.6 Where policies are vital to the delivery of the spatial strategy, key development and infrastructure proposals and are associated with cross-boundary matters, they are identified as 'strategic policies'. Where policies cover more detailed matters, they are considered to be non-strategic. Neighbourhood Plans can also include non-strategic policies. The differentiation between strategic and non-strategic policies is a requirement of the National Planning Policy Framework (NPPF).
- 1.7 The Exeter Plan has been split into topic based chapters to help achieve a usable layout. Nevertheless, it is important that no chapter or policy is read in isolation. Any proposals for development need to comply with all relevant policies in the Plan.

Plan period: 2021-2041

1.8 Previous versions of the Exeter Plan covered the twenty year period between 2020 and 2040. This version of the Plan has evolved and it now covers the period between 2021 and 2041 (2021/22 to 2040/41). This is to ensure that the policies look ahead over a minimum fifteen year period from adoption, as required by the NPPF.

Key Diagram and Policies Map

- 1.9 The Exeter Plan includes a key diagram. This is a schematic plan which shows broad locations of development together with key features in the city.
- 1.10 The Plan is also accompanied by a Policies Map which sits alongside it. This is a more detailed map which shows land-use designations and allocations and acts as a visually representation of the policies in the Plan.

The local planning policy context

- 1.11 The Exeter Plan will replace the adopted 2005 Local Plan First Review and the adopted 2012 Core Strategy as the principal planning policy document covering the city. However, the Plan sits within a wide context of planning policies and links with the work of many organisations.
- 1.12 The preparation of the Exeter Plan sits within a broader planning context that spans various levels of government and different geographies. The NPPF, which establishes the framework for sustainable development nationwide, is at the heart of this planning context. The NPPF places a strong emphasis on striking a balance between social, environmental and economic objectives a balance that the Exeter Plan seeks to achieve. Planning Practice Guidance provides further information about how these overarching policies should be implemented in more detail.
- 1.13 Devon County Council plays a significant role in the function and provision of public services in Exeter. It serves as both the minerals planning authority and waste planning authority, with the Devon Minerals Plan and Devon Waste Plan forming part of the development plan for Exeter. Additionally, Devon County Council is the local education, local transport and lead local flood authority. The Exeter Plan has been developed through close discussions with Devon County Council in relation to these roles.
- 1.14 The Exeter Plan is further informed by its relationship with the local plans for neighbouring East Devon, Mid Devon, and Teignbridge District Councils. When it comes to addressing cross-border issues like employment, housing, transportation, infrastructure and environmental matters, partnership working is essential. The collaborative planning efforts between Exeter and the other District Councils are crucial for creating a cohesive development strategy for the wider area. This subregional perspective is essential in managing the pressures of housing demand, job creation and infrastructure development while preserving the character and environmental integrity of the wider area. A joint strategy called 'Our Shared Coordinates' has been produced to cover Exeter and the wider area.
- 1.15 At a more local level there is currently one Neighbourhood Plan in Exeter covering the St James area. This community level of planning helps to ensure that, as Exeter expands, it will keep its distinct identity and continue to serve its citizens' needs.

1.16 Several other organisations also have a role in, and influence over, the city and planning policy in Exeter. These include the Marine Management Organisation (MMO) which is responsible for protecting and enhancing the marine environment and is marine planning authority in its own right; National Highways, which manages the Strategic Road Network connecting Exeter to the wider region and country; the Environment Agency, which oversees flood risk management and regulates against pollution; Natural England, which is responsible for enhancing and preserving natural environments; and Historic England, which safeguards the historic environment. As well as having their own legislative responsibilities in relation to planning, these organisations contribute to shaping the Exeter Plan so that it balances growth with preserving and enhancing the local natural, built and historic environments.

National planning reforms

- 1.17 During the summer of 2024 the new Government held a consultation on significant national planning reforms. These included a proposed revised NPPF, updated housing requirements for each local planning authority area and transitional arrangements to manage the move to the new regime.
- 1.18 Because the Exeter Plan has progressed to Publication Plan stage before the updated NPPF is published by the Government following consultation, the Plan accords with the December 2023 version of the NPPF. The Plan also meets the housing requirements which were set out prior to the 2024 national consultation.

Publication process

- 1.19 The Publication Draft Plan is published for comment between December 2024 and February 2025. The Publication process must meet the requirements of Regulation 19 of the Town and Country Planning (Local Plan) (England) Regulations 2012. Therefore responses ('representations') are required to conclude on whether the content of the Plan (policies, allocations, general text) is:
 - Legally compliant;
 - Sound; and
 - Complies with the duty to cooperate.
- 1.20 Whether or not the content of the Plan is sound is considered through tests of soundness. The NPPF defines these tests to be whether the Plan is:
 - Positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.21 Representations on the soundness of the plan can be made online, by email and by filling in a paper copy of the representation form.

Next steps

1.22 After the Publication process has ended, the City Council will review the representations, continue to compile evidence for the Plan and then submit the Plan for Examination by the Planning Inspectorate.

- 1.23 The City Council will submit the following to the Planning Inspectorate:
 - The Exeter Plan;
 - The evidence base for the Plan, including the Sustainability Appraisal and the Habitats Regulation Assessment;
 - The representations made during the Publication process; and
 - Various other formal documents.
- 1.24 After submission, a Planning Inspector will host a series of Examination hearing sessions in public to decide whether the Plan needs any changes before if it can be adopted by the City Council. If changes that would materially affect the Plan are required, a further consultation will be organised before the Plan is adopted.
- 1.25 The Examination is likely to take place in 2025, with adoption likely in 2026.



2. Exeter: Ancient City – ambitious future

- 2.1 Exeter, an ancient city at the northern edge of the Exe Estuary, lies about 15 kilometres from the southeast Devon coast. As the thriving capital of Devon, Exeter is home to around 130,000 people and serves as the second largest travel to work area in England which includes East Devon, Mid Devon and Teignbridge. The Exeter City Council area also includes the historic town of Topsham which is known for its picturesque streets and rich maritime history.
- 2.2 The architectural landscape of Exeter is a key element of its distinctive charm. With a history dating back to Roman times, Exeter showcases its rich heritage with around 70% of its ancient City Wall still standing. The city centre is home to many historic buildings such as Exeter Cathedral, completed around 1400, and the Guildhall on the High Street which has been at the centre of local government for more than 800 years.
- 2.3 As one of Devon's two primary urban hubs alongside Plymouth, Exeter is well-served by a comprehensive transport network including the M5 motorway, two main line railway lines and Exeter Airport. The city is strategically located about 240 kilometres from London, 130 kilometres from Bristol, and 70 kilometres from Plymouth. Each day around 35,000 people commute into the city, drawn by its thriving economy, education opportunities and city centre. The city's retail influence is highlighted by the award-winning Princesshay shopping centre and well-known stores like Ikea and John Lewis which help to make Exeter the area's prime shopping destination.
- 2.4 Exeter is a youthful city, with a vibrant student population. The University of Exeter holds a prestigious position; being part of the Russell Group, the University is renowned for its academic excellence particularly in the fields of climate sciences. Additionally, Exeter College, which is well-known for its excellent academic standards, plays a significant role in shaping the educational landscape of the city, further contributing to Exeter's reputation as a hub of innovation and learning.
- 2.5 Exeter is the headquarters of the Met Office, hosting the largest number of experts in the climate research field in the United Kingdom. The city also excels in medical research, with leading specialists and researchers in breast cancer and diabetes at the Royal Devon and Exeter Hospital. The city is also home to the regional offices of several key organisations, including Natural England, the Environment Agency and the Devon and Cornwall Constabulary.
- 2.6 Exeter's appeal is enhanced by its natural surroundings featuring the iver Exe and its estuary, city parks, Valley Parks, the historic Exeter Ship Canal and vital wildlife habitats. The city's distinctive character is further defined by the hills and their distinctive ridgelines that surround the city.
- 2.7 The diverse ethnic groups that make up Exeter's cultural and social fabric help to set the city apart from the surrounding rural area and provide for a vibrant community. Exeter's strong sense of community is further reflected in its passionate support for local sports, with Exeter City Football Club and Exeter Chiefs Rugby Club playing significant roles in the city's cultural and social life.
- 2.8 This city exemplifies a mix of economic vitality, sustainable living, a high quality of life, a fantastic natural environment and a real sense of place. As Exeter continues to grow, it is crucial to not only preserve but also enhance the quality of life of all who

live, work and visit here. By fostering a blend of history, diversity and community spirit, Exeter can ensure a thriving and inclusive future for all.



3. This is our city, this is our future

The Exeter Vision 2040 and Liveable Exeter

- 3.1 In 2019, following engagement with key partners and stakeholders, the City Council adopted an ambitious vision for Exeter for the next 21 years known as the Exeter Vision 2040. As the Exeter Plan also looks to the long term future, it makes sense for it to be guided by the Exeter Vision 2040. Taking this approach will ensure that the Plan helps to achieve this vision.
- 3.2 The Exeter Vision 2040 is included below.

Summary

By the time they are an adult, a child born in Exeter today will live in a city that is inclusive, healthy and sustainable - a city where the opportunities and benefits of prosperity are shared and all citizens are able to participate fully in the city's economic, social, cultural and civic life.

Outcomes

- An innovative and analytical city;
- A healthy and inclusive city;
- The most active city in the United Kingdom;
- A city of accessible world class education;
- A liveable and connected city;
- A leading sustainable city; and
- A city of culture.
- 3.3 The Exeter Vision 2040 refers to a future Exeter that supports collaboration; supports residents in homes that are secure, affordable and healthy; has a strong and growing economy; encourages healthy, active lifestyles; has world-class education and training; supports a vibrant city centre and inclusive and connected neighbourhoods; is carbon neutral by 2030; and is known nationally and internationally as a city of culture, sustainability and innovation.
- 3.4 The achievement of these outcomes and ambitions drives the entire Exeter Plan. The outcomes map across to the key policies and development sites and each chapter includes an objective linked to delivering the Vision.
- 3.5 Alongside the Vision 2040, in 2019 the City Council launched Liveable Exeter. Liveable Exeter will help deliver the Exeter Vision 2040 and this Plan. It is a bold initiative to build new homes in the city in high quality developments and to transform brownfield land, strengthen existing communities and create new neighbourhoods. A series of Liveable Exeter principles will guide the largest developments to ensure they are of the highest quality. The principles are included in this Plan (Policy S2: Liveable Exeter Principles).

- 3.6 In 2022, the City Council launched a related planning initiative, the Exeter Design Quality Partnership. This aims to improve the way sustainability and design quality is addressed in the city.
- 3.7 The Exeter Design Quality Partnership is between the City Council, landowners, funding institutions, promoters of development and developers and is framed by the Exeter Vision 2040 and Liveable Exeter. It is about raising the level of ambition in design and city-making in Exeter, through collaboration.

Delivering the vision

- 3.8 The City Council cannot deliver Exeter's Vision on its own. That is why the Exeter Partnership was created. Each organisation represented on the Exeter Partnership has endorsed the Exeter Vision 2040.
- 3.9 The Exeter Partnership enables collaboration between the city's anchor institutions, sub-regional partners and the Government, in delivering Liveable Exeter. Whilst the Exeter Partnership has an independent Chair and does not take decisions, it does acts as a critical friend, challenging partners to achieve the principles which underpin Liveable Exeter. The Exeter Vision 2040 will be delivered in different ways using a range of innovative tools including the Exeter Plan. However, there are other mechanisms which are being used to deliver high quality development in the city.
- 3.10 Other City Council plans, including the Corporate Plan and the strategies of key institutions and partners, will also play a vital role in delivering the Exeter Vision 2040.
- 3.11 The City Council is working closely with its delivery partners on other initiatives including:
 - The Net Zero Exeter 2030 Plan:
 - The Cultural Compact and Exeter Cultural Strategy;
 - Live and Move the Sport England Local Delivery Pilot;
 - Exeter City of Literature (UNESCO);
 - InExeter Exeter's Business Improvement District;
 - Devon County Council plans including the Exeter Transport Strategy, Local Cycling and Walking Infrastructure Plans and the Local Transport Plan 4;
 - Heart of the South West Local Industrial Strategy;
 - Exeter Civic University Agreement and the University 2030 Strategy; and
 - Exeter College Strategic Plans.
- 3.12 Linked to these other strategies, the Exeter Plan will act as a focal point for discussions with the Government and its associated departments and agencies (such as Sport England, Homes England, Arts Council England, the Environment Agency, Natural England, National Highways and Historic England) to support the delivery of the Exeter Vision 2040. The Plan will inform bids for external funding, including for housing, infrastructure, environmental schemes and other priorities as needed.
- 3.13 As well as planning for change over the next twenty years through the Exeter Plan, development may come forward through innovative approaches using a variety of models. The City Council will continue work with partners to explore new, innovative delivery mechanisms to support high quality development and infrastructure delivery.

4. Spatial strategy

Spatial strategy: An explanation

- 4.1 A key part of the Exeter Plan is the spatial strategy. This sets out the main principles for guiding the pattern and form of development in the city. Details about the amount of development required for housing and employment are included in other chapters of the Plan. The spatial strategy flows from the Exeter Vision 2040. It plans for the city's growth, recognising Exeter as a sustainable location for major development and reinforcing its position as the area's economic engine.
- 4.2 In putting together the spatial strategy, we have looked at a series of documents and viewpoints including national policies (in the National Planning Policy Framework), previous local planning policy (the Core Strategy and Exeter Local Plan First Review), ideas from the Liveable Exeter initiative, work previously put together on documents which are no longer progressing (such as the Greater Exeter Strategic Plan and the Development Delivery Document), responses to previous consultations and the evidence base for the Plan.
- 4.3 The strategy in the Core Strategy contains various principles, including directing some development close to the city centre on brownfield land, providing large urban extensions on greenfield land on the edge of the city and steering development away from the hills surrounding the city.
- 4.4 This spatial strategy has been reviewed to ensure that it reflects the Exeter Vision 2040 and the City Council's priorities. The main change from the strategy in the Core Strategy is to move away from one of the main components of the previous approach the provision of large, greenfield urban extensions on the edge of the city. These urban extensions have now largely been built out and there is very limited capacity for additional development on the edges of the city.
- 4.5 There are also some vital elements of the strategy in the Core Strategy that we need to keep, including the protection of the River Exe and the city's hills and the provision of green infrastructure. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape setting and retain Exeter's environmental quality. This strategy will also help to achieve the City Council's net zero 2030 ambition, enable nature recovery, continue Exeter's economic success and support a healthy and inclusive city. The strategic mixed use brownfield allocations will also support the vitality of the city centre.
- 4.6 Although the focus is firmly on brownfield development, some greenfield development will help to provide a mix of sites, maintain a pipeline of development in the near future and deliver a five year housing supply. However, the number of greenfield sites will be modest in the context of the significant brownfield focus.
- 4.7 Another key part of the strategy that the brownfield approach supports is to ensure that residents have walkable access to services and facilities. The basic premise is to develop neighbourhoods where daily services can be accessed easily by active travel; this will play a role in minimising carbon emissions, improving health and wellbeing and enhancing access to services.

4.8 The spatial strategy is included in Policy S1. The development allocations included elsewhere in the Exeter Plan have been guided by the spatial strategy.

S1: Spatial strategy (Strategic policy)

The spatial strategy will deliver on the Exeter 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 toto 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; and
- 15. Delivering the range of infrastructure and services needed in a timely manner to support high quality development and our communities.

Liveable Exeter principles

- 4.9 Exeter is a growing city with an ambitious future. The Liveable Exeter initiative originally set out sites that could accommodate new homes within a series of high quality, brownfield developments.
- 4.10 It is important to increase the population living in the central areas of the city and encourage people who may have left Exeter to return to live in a variety of new homes including apartments. Homes will be built within vibrant neighbourhoods that are walkable, have cafes, shops, community uses and workplaces and easy access to nature and green infrastructure.
- 4.11 It is vital to make the best use of brownfield land in the city by optimising density to support the significant increase in new and affordable homes and infrastructure we need. This will often mean developing at densities above those of the surrounding area. A design-led approach to optimising density is advocated which should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form. The highest densities should be located in the most accessible and sustainable locations close to the city centre, public transport and a high-quality walking and cycling network.
- 4.12 The City Council recognises the unique characteristics of the city which need specific consideration when moving to a spatial strategy with a focus on brownfield development. Exeter's heritage is a particularly important asset and therefore development will need to respect and enhance it.
- 4.13 Given the importance of the large brownfield sites in meeting our development needs, in 2019, the City Council published its transformational housing delivery programme under the banner of Liveable Exeter. This set out the City Council's ambitions to help meet our housing needs by developing strategic mixed use brownfield sites across the city.
- 4.14 The spatial strategy requires significant brownfield development on strategic mixed use development sites as identified elsewhere in the Exeter Plan. These strategic sites offer the potential for new, exciting forms of sustainable, high quality mixed use development.
- 4.15 Whilst some of these sites form an integral part of the spatial strategy and are allocated in the Exeter Plan, Liveable Exeter is not just a series of sites but a growth and city-making initiative governed by six principles which have been drawn from the Exeter Vision 2040 and national Garden City principles. In adopting the Liveable Exeter principles, we aim to strengthen and reinvigorate existing communities and repurpose and transform other parts of the city which need to change. Collectively the Liveable Exeter principles will achieve the following:
 - Development proposals which make the best use of brownfield land and build at optimal densities. All developments should look to optimise their development footprint, accommodating access, servicing and parking in the most efficient ways possible:
 - New development that contributes positively to an area's character and identity, creating or reinforcing local distinctiveness;
 - New development that supports a thriving city centre and district and local centres, ensuring that for local trips, active travel becomes the most convenient

option, and for longer trips, public transport becomes more viable. People-friendly, human-scale streets should be a joy to walk and wheel along and incorporate high quality design, materials, improved air quality and overlooking from surrounding buildings;

- Developments that adopt innovative approaches to mixing land uses and delivering a high quality public realm. Where possible, different land uses should be combined, with residential above businesses and community uses commonplace; and
- High quality buildings which support the health and wellbeing of their occupants and are responsive to the changing way we live, work and spend our leisure time.
 Public spaces and private communal areas will be safe, accessible, inviting and well used, without the fear of crime. Individual homes should provide sufficient comfort, natural light, privacy and quiet.
- 4.16 The Liveable Exeter principles will apply to the strategic mixed use brownfield development sites identified in the Exeter Plan and other major sites that may come forward in future. These principles are a vital element in steering development and go hand in hand with the spatial strategy of delivering quality development on brownfield land.
- 4.17 The City Council will work collaboratively with landowners and developers to promote the Liveable Exeter principles. Wider planning policy, masterplans, design codes, supporting evidence and other design tools will support this approach, recognising that the characteristics of future development will be site specific. To demonstrate this approach, the City Council has adopted the Liveable Water Lane Supplementary Planning Document containing a development framework and design code for the Water Lane allocation to specifically steer the quality of this area of the city.

S2: Liveable Exeter Principles (Strategic policy)

The delivery of strategic, mixed use brownfield developments will be supported.

Strategic mixed use brownfield development proposals must be accompanied by a masterplan or design code which includes a vision and planning/design framework to guide the comprehensive development of the wider site area.

All strategic mixed use brownfield development proposals must demonstrate how each of the following Liveable Exeter principles and requirements will be achieved.

Principle 1: Memorable places. Development will:

- Contribute positively to an area's character and identity, creating local distinctiveness and reinforcing its role within the city;
- Respond positively to local topography, open spaces and waterways and maximise views to Exeter's natural and built landmarks and features;
- Make efficient use of land so Exeter remains compact and walkable;
- Enable sustainable transport for access to the city centre, district and local centres, employment areas, the River Exe and the Valley Parks; and
- Contribute to the varied and innovative social, economic and cultural offering in the city.

Principle 2: Outstanding quality. Development will:

- Build at optimal density, incorporating the highest appropriate densities in the most accessible and sustainable locations;
- Incorporate innovative solutions for buildings, transport provision, energy, sustainable
 waste management and other infrastructure to achieve our ambitions for a net zero city
 by 2030;
- Enhance Exeter's natural, built and historic environments, particularly at gateway and arrival points, main routes into the city, city centre, the Ship Canal and Basin, the River Exe and the Valley Parks;
- Provide innovative and exciting education, research, skills, work and leisure destinations in prominent and accessible locations; and
- Ensure neighbourhoods function effectively in the long term by incorporating stewardship measures which provide for the effective management and maintenance of the public realm, communal private spaces and environmental assets.

Principle 3: Welcoming neighbourhoods. Development will:

- Provide a variety of high quality, affordable, market and specialist homes catering for local needs;
- Support a wide range of accessible, local jobs and education and skills provision to link employment and learning;
- Enable accessible, thriving city, district and local centres and create new centres where appropriate, delivering local shops, open spaces, community, education and health facilities that foster a sense of community;
- Provide safe, healthy, accessible and inclusive streets, public spaces and areas for play which are people-friendly, human in scale, well managed and cared for; and
- Phase delivery to ensure important infrastructure and facilities are provided early on.

Principle 4: Liveable buildings. Development will:

- Be adaptable and resilient to the effects of climate change;
- Respond flexibly to changing demands and lifestyles;
- Include beautiful buildings which complement local character using high quality designs and materials;
- Ensure buildings are energy efficient, adopt a fabric-first approach and apply high performance standards such as Passivhaus and whole-life carbon assessment;
- Provide homes that are predominantly dual aspect ensuring high levels of natural daylight and ventilation; and
- Be arranged and designed to maximise internal air quality.

Principle 5: Active streets. Development will:

- Incorporate active travel and passive surveillance measures at the outset of development design;
- Incorporate the Healthy Streets design approach, where appropriate;
- Make direct connections to the active travel network and key destinations;
- Reallocate road space to maximise active travel, public transport, shared mobility and the provision of attractive public spaces through seating and planting; and
- Maximise parking and storage for cycling, provide infrastructure to support electric vehicles and bicycles and minimise parking for private cars.

Principle 6: Spaces for people and wildlife. Development will:

- Deliver multifunctional green infrastructure to provide benefits for people and nature, create greener, healthier places and support a more productive economy, whilst. also enhancing and improving access to the historic environment;
- Provide and enhance networks and connections to existing green infrastructure networks and spaces, including the Valley Parks, Green Circle and waterways;
- Maximise opportunities for landscaping, planting and trees using tools such as the Urban Greening Factor;
- Promote vitality and inclusivity by providing safe, accessible and attractive places for play, recreation, food growing and socialising outdoors; and
- Ensure that space, buildings and infrastructure are created specifically with opportunities to deliver a thriving nature-rich city.

Principle 7: Connected Culture. Development will:

- Use cultural enhancements and provision to improve development quality;
- Support local economic growth by providing flexible space for creative industries;
- Create resilient, adaptable, networked communities and successful centres that support civic pride and express local identity;
- Support high quality cultural placemaking projects in the public realm and community facilities to achieve exemplary social value and environmental quality;
- Safeguard, promote access to, and reflect, cultural heritage in local placemaking; and
- Harness Exeter's rich heritage, local identities and creative talent through civic participation in culture and by supporting 'meanwhile uses'.



Vision – A leading sustainable city

Addressing climate change links to the aim in the 2040 vision of being a leading resilient and sustainable city. Mitigating and adapting to climate change will help to improve energy efficiency in buildings, provide renewable and decentralised energy, respond to flood risk and adapt to become more resilient to flooding and other environmental changes.

Vision – A healthy and inclusive city

Addressing climate change links to the aim in the 2040 vision of creating a heathy and inclusive city. Mitigating and adapting to climate change will help to minimise energy costs, deliver more resilient energy networks, overcome health inequalities and provide a healthier and cooler environment.

Vision – A city of culture

Addressing climate change links to the aim in the 2040 vision of creating a city of culture where the environment plays a leading role. Mitigating and adapting to climate change can only be achieved through cultural exchange, engagement and a genuinely collective effort.

Objective: Make the fullest possible contribution to the mitigation of, and adaptation to, climate change working towards a net zero carbon city.

Introduction

- 5.1 The planet is facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. In recognition of this, the City Council has declared a climate emergency and pledged to work towards creating a net zero carbon city by 2030. We have adopted the Net Zero Exeter 2030 Plan which sets out what Exeter will need to put in place to be net zero carbon by 2030. The City's net zero carbon ambition sits well with the Devon Carbon Plan and the aspirations of neighbouring authorities.
- 5.2 The Exeter Plan will include policies and proposals that contribute to meeting this challenging ambition and to make the most of the opportunities of a net zero carbon city, whilst adapting to the unavoidable impacts of climate change. Many of the key policies are included in this chapter; however, others are presented elsewhere in the Exeter Plan (for example chapter 8 'Sustainable transport and communications' includes policies on movement and active travel and chapter 10 'History and Heritage' includes a policy on heritage assets and climate change).

Net zero Exeter

5.3 The city's ambition, to be net zero carbon by 2030, is 20 years earlier than the 2050 national net zero target required under the Climate Change Act. This is an incredibly challenging ambition, but the nature of the issue justifies this position. Success will only be achieved through engagement and a genuinely collective effort; we need all organisations, individuals and institutions to play their part.

- 5.4 The City Council is collaborating with the University of Exeter. The University is world-leading in environmental intelligence. It works closely with a range of public and private sector partners in delivering education, research and knowledge exchange activities.
- 5.5 The performance of buildings will be vital in achieving net zero. The Government's Future Homes Standard seeks to deliver homes that are zero carbon ready by 2025. The Government has also set out a new Future Buildings Standard which provides a pathway to deliver new non-domestic buildings that are zero carbon ready from 2025. Changes have already been made to the Building Regulations to reduce carbon emissions and provide a stepping-stone to implementing the new standards. The City Council will keep the Government's progress in achieving these standards under review and, if necessary, implement our own energy efficiency requirements to ensure new development is making reductions in carbon emissions and also playing its role in helping to minimise fuel bills during these challenging times.
- 5.6 However, it is not just the efficiency of buildings themselves that matters. The location of new development and density and urban form are central. Urban intensification on brownfield sites can enable growth while achieving a reduction in travel demand and an increase in sustainable travel, especially with the support of the Exeter Local Cycling and Walking Infrastructure Plan. Higher densities and combinations of uses are likely to provide greater potential for local energy networks and cost effective, low carbon energy.
- 5.7 Looking more widely, the circular economy, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible, will also be key. When a product reaches the end of its life, its materials are kept within the economy wherever possible thanks to recycling. Materials can be productively used again and again, thereby creating further value. By applying the principles of a circular economy, the life cycle of buildings is extended and waste is kept to a minimum. In accordance with the principles of the circular economy, any infrastructure and development should be underpinned by sustainable waste management, whether it be in relation to construction or ensuring that new homes have appropriate layouts for waste collection services. Development should look to follow the waste hierarchy, supported by the Devon Waste Plan, reduce waste, reuse any waste generated on site and within the development, or recycle this waste. Disposal of waste should be the last option.
- 5.8 Renewable sources of energy including sun, wind, water and ground and air source heat pumps make an important contribution to cutting carbon emissions. Biomass energy from organic matter and energy from waste can also play a part. These sources can offer diversity and security of supply and can reduce harmful emissions to the environment. Whilst grid electricity is increasingly being supplied by renewables, there is still a need to maximise onsite renewable energy generation while community-led renewable and low carbon energy schemes also have an important role to play.
- 5.9 Green infrastructure, sustainable drainage systems (SuDS) and other nature-based solutions to flood risk also have an important role in climate change mitigation. Through carbon sequestration (for example, trees storing carbon) and urban cooling, these nature-based solutions have a role that extends beyond the obvious environmental and health benefits.
- 5.10 Policy CC1 brings together many of these considerations to ensure that they are addressed together. All development should be planned over its whole lifetime to limit

carbon emissions and applicants will be required to demonstrate how their development will contribute to achieving net zero. For major applications a Net Zero Statement, addressing each of the policy requirements below, will need to be submitted with the application.

CC1: Net zero Exeter (Strategic policy)

The City Council has an ambition for the city to be net zero by 2030.

Development proposals will be required to demonstrate how they will support the achievement of net zero through each of the following:

- a. Considering location, urban form, density and place-specific solutions;
- b. Minimising the need to travel and maximising walking, wheeling, cycling and public transport;
- c. Applying a fabric first approach to maximise energy efficiency;
- d. Maximising renewable and low carbon energy generation;
- e. Minimising operational and embodied carbon emissions;
- f. Applying the principles of the circular economy;
- g. Utilising SuDS and other nature-based solutions to deliver flood risk management; and
- h. Providing green infrastructure, biodiversity net gain and landscape-led schemes.

All major development proposals will be required to submit a Net Zero Statement setting out how the development will address each of the requirements of the policy.

Renewable and low carbon energy

- 5.11 In order to achieve net zero it is vital that we increase the use and supply of renewable and low carbon energy. The National Planning Policy Framework identifies the responsibility of all communities to contribute to energy generation from renewable or low carbon sources.
- 5.12 Community initiatives are likely to play an increasingly important role and are encouraged as a way of providing positive local benefit from renewable energy development. Community organisations generating energy and/or providing energy advice in Devon are represented by the Devon Community Energy Network. Communities looking to set up new projects should make contact with the Network. Examples of projects that are in the pipeline include rooftop solar and district heating networks.
- 5.13 There are also many examples of innovation from the private sector including businesses delivering clean green hydrogen, research into new forms of battery storage, development of smart energy management systems and schemes where surplus/waste heat is captured and used to provide 'free' heat elsewhere.
- 5.14 Many of these schemes are not classed as development for the purposes of planning. Microgeneration and retrofitting existing premises are often permitted development that may not require planning permission. However, where planning permission is required for renewable energy developments, the City Council will not require applicants to demonstrate the overall need for renewable or low carbon energy. The City Council recognises that small scale projects provide a valuable contribution to cutting greenhouse gas emissions and will approve development if its

impacts are acceptable (or can be made acceptable by means of conditions). This approach is set out in Policy CC2. Additional guidance on proposals involving heritage assets is provided in Policy HH2: Heritage assets and climate change.

CC2: Renewable and low carbon energy (Strategic policy)

Renewable and low carbon energy-generating development, and all related enabling infrastructure (including battery storage and other energy storage facilities), will be supported where proposals avoid unacceptable impacts on amenity and the natural, historic and built environments. Clear evidence of local community involvement and leadership will be given substantial positive weight.

Development proposals for energy generation that is neither renewable nor low carbon will not be permitted.

Local energy networks

- 5.15 By considering existing and proposed development and by working in partnership with developers and other organisations, more decentralised energy networks can be set up that will support the move to a net zero carbon city.
- 5.16 The efficiency of smaller scale local thermal electricity generation can be doubled through the use of co-produced heat, thereby giving an overall efficiency greater than comparable centralised power generation. These efficiencies can be achieved through linking combined heat and power plants, which recover and use heat that would otherwise be wasted, to local energy networks. These provide heat and electricity via a local heat network of pipes and infrastructure which properties can connect to. Renewable generation has even greater potential for carbon savings, by using low or zero carbon energy sources.
- 5.17 There are already heat networks in the city, including at Monkerton, that show how these projects can be provided. The City Council has identified areas where the scale of development or the heat-use opportunities are great enough to justify the planning, design and delivery of heat networks. Policy CC3 identifies the areas where evidence suggests local energy networks are feasible and viable. The requirements set out in the policy must be adhered to unless it can be demonstrated by the applicant at the detailed design stage (i.e. full or reserved matters stage) that the approach is not feasible or viable. The policy also requires that new development outside these areas, but in reasonable proximity to a network, be constructed to allow connection as and when a network is rolled out. Any local energy networks being established adjacent to the City Council's boundary will take account of development proposals outside of the city and be planned and delivered so that a single energy network is provided, where that is appropriate and viable.

CC3: Local energy networks (Strategic policy)

Local energy networks are proposed in the following locations:

- a. Monkerton and Hill Barton;
- b. The city centre, South Gate, Heavitree Road and Wonford;
- c. Matford, Marsh Barton, Water Lane and Exe Bridges Retail Park;
- d. Red Cow, New North Road and the University of Exeter; and
- e. 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, and throughout the city within 500 metres of any local energy network subject to a contractual commitment, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more homes, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include provision for the necessary pipework connection from those in-building systems up to the appropriate site boundary to allow for future connection to the network when available, unless it can be demonstrated by the applicant at the detailed design stage, having regard to the type of development involved and its design, that this is not feasible or viable.

Elsewhere, any large scale residential or non-residential development proposal must demonstrate that consideration has been given to whether it is feasible and viable for that development to be connected to any local energy network.

Ground-mounted photovoltaic arrays

- 5.18 In the United Kingdom we receive a vast amount of solar energy; in an average year we receive as much as 60% of the solar energy which is received at the equator. This can be compared to the yearly output of 1,000 power stations (Planning Guidance For The Development Of Large Scale Ground-Mounted Solar Photovoltaic Systems, Building Research Establishment).
- 5.19 The Centre for Energy and the Environment (University of Exeter) was commissioned by the City Council to consider and map the potential for large scale ground-mounted photovoltaic (PV) arrays within the city. Whilst this high-level analysis does not assess suitability, it does suggest that there is potential for ground-mounted photovoltaic array development within the city boundaries. The new publicly owned National Energy System Operator should help to bring forward the grid infrastructure needed to deliver such schemes.
- 5.20 Ground-mounted arrays will not be suitable for all sites. The visual impact, both in terms of the physical form and resulting glare from the array, as well as any associated infrastructure and boundary treatment, will need to be carefully assessed in a Landscape and Visual Impact Assessment. Reference should also be made to the Devon Advice Note 2 Accommodating Wind And Solar PV Developments In Devon's Landscape.
- 5.21 For any proposal, consultation with the City Council and local community is encouraged at an early stage. The local community should be engaged by the

- developer at the pre-design, conceptual stage, ideally using a local exhibition / presentation where community views can be sought and recorded. Opportunities for community benefit should be explored wherever practical.
- 5.22 Policy CC4 outlines criteria to be met in order for ground-mounted photovoltaic arrays to be supported.

CC4: Ground-mounted photovoltaic arrays

Proposals for ground-mounted photovoltaic arrays will be supported if they:

- a. Are sited on brownfield land or agricultural land of classification 3b,4 or 5;
- b. Minimise visual impacts, including cumulative impacts, on the landscape;
- c. Avoid adverse effects on the European Wildlife Sites and on any other known sites of biodiversity interest;
- d. Do not result in the loss of public access, open space or areas of recreation, nor harm the potential opportunities for these functions;
- e. Protect the setting of heritage assets;
- f. Avoid areas of high flood risk; and
- g. Do not result in unacceptable amenity and safety impacts.

Future development standards

- 5.23 The Exeter Plan is likely to be adopted at a similar time to the proposed introduction of the Future Homes Standard (FHS) and the Future Building Standard (FBS). These Standards are being introduced by the Government in order to deliver highly efficient homes and non-domestic buildings respectively which are zero carbon ready, better for the environment and fit for the future. The FHS should ensure that all new homes built from 2025 produce at least 75% fewer carbon emissions than homes delivered under the Building Regulations Part L 2013. The new FBS requirements for non-domestic buildings should ensure the heating source does not utilise fossil fuel and PV panel coverage is included. This will significantly reduce the regulated operational emissions for a typical building and make an important contribution to achieving net zero.
- 5.24 In accordance with the Government's expressed intention to introduce the FHS and FBS in 2025, Policy CC5 seeks to ensure that the level of ambition is achieved and the timetable does not slip. This provides a local back-up to the national ambition.

C5: Future development standards (Strategic policy)

From 2025, residential development will be required, as a minimum, to achieve a 75% carbon dioxide emissions reduction from that required under the 2013 Building Regulations.

From 2025, non-domestic buildings will, as a minimum, be required to achieve:

- a. A fabric standard at least as good as that required under the current Building Regulations:
- b. Heating using a heat pump or heat network (which does not utilise fossil fuel); and
- c. Solar PV panel coverage equivalent to 40% of the building's footprint for side-lit spaces and 75% of the building's footprint for top-lit spaces.

Embodied carbon

- 5.25 Embodied carbon emissions are those associated with raw material extraction, manufacture and transport of building materials, construction, maintenance, repair replacements, dismantling, demolition and eventual material disposal.
- 5.26 Around 10% of the United Kingdom's emissions are thought to be associated with the embodied carbon from new construction. As operational emissions increasingly reduce, embodied emissions will make up a greater proportion of total carbon from the whole life of a building. Work carried out for the Royal Institution of Chartered Surveyors suggests that embodied carbon currently makes up between 35% and 51% of a building's total emissions, rising to 70% as operational energy decarbonises.
- 5.27 A true net zero building is operationally net zero, made from 100% reused materials, and where 100% of the materials can be reused again at the end of its life (if construction, transport and disassembly are carried out with renewable energy). In practice this is extremely hard to achieve in the current United Kingdom market and so some embodied emissions are unavoidable. However, simply measuring embodied carbon emissions, and then reducing these emissions as far as possible through good design and planning, can make a significant difference.
- 5.28 Policy CC6 introduces a requirement to measure embodied carbon emissions and take action to reduce this impact. In determining what action needs to be taken to meet the policy requirements, reference should be made to the Delivering Policy CC6: Embodied Carbon Report and the accompanying Embodied Carbon Delivery Checklist, both of which support the delivery of this policy.
- Policy CC6 also introduces a presumption against one-for-one replacement of habitable homes. One-for-one replacement of homes often leads to a significantly greater lifecycle carbon footprint when compared to refurbishment; however, site specific circumstances and the design of the proposed new build can impact on this, so if it can be demonstrated that the new build performs better in terms of carbon emissions, the policy presumption will not apply.

CC6: Embodied carbon

To drive action to reduce embodied carbon emissions, major development proposals will only be permitted where:

- The impact on climate change from carbon emissions embodied in the product and construction stages of development is calculated using a nationally recognised carbon assessment method; and
- b. It is demonstrated that adequate steps have been taken in the product and construction stages of development to reduce this impact.

Minor residential development proposals that involve one-for-one replacement of existing habitable homes will only be permitted where it can be demonstrated that refurbishment is not feasible or viable, or where it is demonstrated that the proposed new build performs better than refurbishment in terms of lifecycle carbon footprint.

Development that is adaptive and resilient to climate change

- 5.30 Climate change is unavoidable and we must adapt to climate consequences so we can protect ourselves and our communities. Therefore, adaptation and resilience need to be at the heart of future growth and development in Exeter.
- 5.31 The Local Climate Adaptation Tool has been used to provide insight into how local climates will change, what health and community impacts may occur, who will be most vulnerable and why and which adaptations to consider. The policy approach also draws on the Devon, Cornwall And Scilly Climate Change Adaptation Plan.
- 5.32 The following issues are considered key to delivering adaptive and resilient development:
 - Reducing overheating in buildings: Developers must demonstrate how
 development is designed for a warmer, more extreme climate and use cooling
 through passive mechanisms where possible, following the cooling hierarchy. This
 includes mechanisms to maintain comfortable temperatures inside buildings and
 the surrounding urban area;
 - Reducing flood risk and aiding recovering from flooding: Place-based and
 property level interventions should be incorporated into developments to both
 alleviate and aid recovery from flooding. Developments with large artificial and
 impermeable surfaces are discouraged; instead plans must incorporate soft
 landscaping, green infrastructure and permeable surfacing. Developments should
 also be designed to prevent damage from flooding and, where possible, aid quick
 recovery;
 - Integrating biodiversity into the built environment: Developments should be
 designed to reduce the impact of urbanisation on biodiversity by creating space for
 wildlife in the built environment. The term 'wildlife' includes all living organisms,
 ranging from plants to birds, mammals to lichens, fungi and invertebrates.
 Proposals must increase the abundance and diversity of wildlife. The Residential
 Design Guide Supplementary Planning Document provides helpful guidance,
 including in relation to bat and bird box provision;
 - Adapting to reduced water availability: To adapt to reduced water availability
 and more frequent instances of drought, buildings must be designed to reduce
 water demand. In addition to installing efficient utilities to meet the requirements of
 Policy CC9, further innovative measures to reduce water use will be sought; and
 - Retrofitting renewable energy technologies: Building designs that provide for the later installation of building based renewable technologies such as roof mounted solar photovoltaic panels will be sought.
- 5.33 At an early stage of design, adaptation and resilience should be key considerations. It needs to be demonstrated that measures have been implemented to address the issues listed in Policy CC2, unless this is not practical or viable. In determining what action needs to be taken to meet the policy requirements, reference should be made to the Climate Change Adaptation And Resilience Report which supports the delivery of this policy.

CC7: Development that is adaptive and resilient to climate change

Development proposals will be required to demonstrate how they will adapt to a changing climate and remain resilient over their lifetimes by:

- a. Reducing overheating in buildings
- b. Reducing flood risk and aiding recovery from flooding;
- Integrating biodiversity into the built environment;
- d. Adapting to reduced water availability; and
- e. Retrofitting renewable energy technologies.

Flood risk

- 5.34 Increasing flood risk is one of the most high profile consequences of climate change. The south west of England has already experienced a significant increase in precipitation and the recent climate pack from the Met Office suggests that for Exeter, winter precipitation could increase by between 5% and 19% by the 2030s, leading to an increased risk of river and surface water flooding.
- 5.35 The Exeter Plan spatial strategy in Policy S1 seeks to avoid areas of higher flood risk (from fluvial, surface water or other sources) by following a sequential, risk based approach to the location of development informed by the Strategic Flood Risk Assessment (SFRA) Levels 1 and 2. However, development in the urban area on brownfield sites has significant and widespread benefits, including the potential to help mitigate climate change by limiting the need to travel and supporting local energy networks. In order to deliver the sustainable regeneration of brownfield areas such as at Water Lane and Marsh Barton, flood risk will need to be mitigated through SuDS and other nature-based solutions, and managed through design and site layout to ensure the development is appropriately flood resistant and resilient.
- 5.36 Policy CC8 sets out how the City Council will consider flood risk. In all areas, development will need to integrate SuDS into the design and layout. SuDS mimic natural drainage processes and the benefits include minimised costs, reduced overall flood risk, enhanced nature conservation and amenity value, recycling valuable water resources and better control of pollution from urban run-off. The types of SuDs which it may be appropriate to consider will depend on the proposed development and its location, as well as any planning policies and guidance that apply locally. Where possible, preference should be given to multi-functional SuDs and to solutions that allow surface water to be discharged according to the following hierarchy of drainage options:
 - Discharge into the ground (infiltration); or where not reasonably practicable;
 - Discharge to a surface water body; or where not reasonably practicable;
 - Discharge to a surface water sewer, highway drain or another drainage system; or where not reasonably practicable; and
 - Discharge to a combined sewer (subject to the sewerage undertaker carrying out capacity evaluation).
- 5.37 Where SuDS are not appropriate, appropriate flow attenuation facilities or mitigation measures will be required. For more information, applicants are advised to refer to

- the Sustainable Drainage Systems: Guidance for Devon document (Devon County Council).
- 5.38 In areas of high flood risk (Flood Zones 2 and 3 and other areas of high flood risk), the risk of flooding should be recognised as a key constraint to development. Applicants will need to demonstrate that development is safe for its lifetime, with safe access and egress routes provided where needed. Urban regeneration/ redevelopment should also be seen as an opportunity to make improvements to green and other infrastructure to reduce the causes and impacts of flooding in accordance with the National Planning Policy Framework (NPPF). Where justified by flood risk, the removal of permitted development rights for hard surfacing will be considered

CC8: Flood risk (Strategic policy)

In all areas at risk of flooding from any source, development proposals will only be permitted where it is demonstrated that the proposal satisfies the sequential test and, where necessary, the exception test. In Flood Zone 3, residential development will only be permitted where, in addition to satisfying these tests, it also contributes to reducing flood risk overall.

A site-specific flood risk assessment will be required for all development proposals at risk of flooding. All development proposals must mitigate against flood risk by adhering to the drainage hierarchy and by utilising Sustainable Drainage Systems unless there is clear evidence that this would be inappropriate.

Water quantity and quality

5.39 Local planning authorities must adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Policy CC9 requires new development to contribute to reducing water demand and improving water quality.

Quantity

- 5.40 Over recent years South West Water has reported unprecedented demand for water in the Exeter area; this is partly as a result of the trend towards staycations, but also as a result of warmer summers and drier winters. This increase in demand, combined with the changes in climate, puts a strain on the water supply infrastructure and sources used for abstraction. This is an early sign of the pressures that are likely to be felt in the future regarding water supply as we experience more of the effects of climate change.
- 5.41 Under climate change scenarios up to 2050, the Devon, Cornwall and Isles of Scilly area is modelled to potentially be impacted by much lower summer flows due to lower rainfall. In light of the evidence of emerging trends towards water being an increasingly scarce resource, a tighter water efficiency requirement of 110 litres per person per day for new homes is justified to help manage demand.

Quality

- 5.42 The Exeter Plan area includes seven water bodies: Lower River Clyst, Upper River Clyst, North Brook, River Exe (Creedy to Estuary), Alphin Brook, Matford Brook and the Exe. Of these water bodies, six have been identified as failing to meet good ecological status under the Water Environment Regulations due to having excess levels of nutrients. The sources of nutrients in these water bodies have been identified as urbanisation, agriculture, water company activities, septic tanks, misconnections and private sewage treatment. Over the Plan period, the additional development and the decreased dilution that will be experienced in waterbodies because of climate change will see these pressures become more acute without appropriate interventions.
- 5.43 There may be potential to deliver enhancements within the Valley Parks and landscape setting areas that help return Exeter's water bodies to good ecological status under the Water Environment Regulations. However, it will also be necessary to look upstream of these waterbodies, outside Exeter's boundaries, to deliver some of these enhancements. Development proposals that support the return of Exeter's water bodies to good ecological status will be supported.
- The delivery of the South West Water Drainage And Wastewater Management Plan and the Storm Overflow Action Plan will also be key to addressing this issue. The City Council will continue to work closely with partners including South West Water (who have recently established the Centre For Resilience In Environment, Water And Waste at the University of Exeter's Streatham campus) to deliver these emerging plans. There needs to be a reduced reliance on combined storm overflows and any new development should prioritise surface water separation and utilise SuDS as required by Policy CC8 (and the associated legislation). Policy HW2 also seeks to ensure that development proposals are only permitted where there are no unacceptable impacts on surface and ground water quality.

CC9: Water quantity and quality

All new residential development proposals must achieve, as a minimum, water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Development proposals that support the return of Exeter's water bodies to 'good' ecological status, and thereafter maintain that status, will be supported. Development proposals that harm the ecological status of any of Exeter's water bodies will not be supported.

The City Council will work closely with South West Water and all other partners to help deliver the Drainage And Wastewater Management Plan and the Storm Overflow Action Plan.



6. Homes

Vision - A healthy and inclusive city

Addressing Exeter's housing need links to the aim in the 2040 vision of creating a healthy and inclusive city. Enabling our communities to access the homes they need will help to promote both physical and mental health, provide safety, security and reduce inequalities.

Vision – A liveable and connected city

Addressing Exeter's housing needs links to the aim in the 2040 vision of being a liveable and connected city. Providing new homes close to jobs, services and facilities will help to provide high quality neighbourhoods and create inclusive communities.

Vision – A leading sustainable city

Addressing Exeter's housing needs links to the aim in the 2040 vision of becoming a leading sustainable city. Helping our communities to access the homes they need, in locations close to jobs, services and facilities will bring environmental, social and economic benefits to the city.

Objective: Provide the quantity, type, quality and affordability of homes that Exeter needs in the right locations.

Introduction

- 6.1 Housing is a big issue, not just in terms of the number of homes needed but also relating to their quality; experiences during the Covid-19 pandemic underlined just how much we need good quality housing. The Exeter Plan helps to address the shortage of affordable homes in the city and provide the good quality accommodation we all need. Young adults, families, older people, those with disabilities, essential local workers, care leavers, students and Gypsies and Travellers all have specific housing needs which we need to meet.
- The policies in this chapter seek to provide the quantity, type and quality of homes that Exeter needs and to ensure they are in the right locations.

Housing requirement

- 6.3 The Government sets a formula for local planning authorities to calculate the minimum number of homes that should be built in an area each year to meet local needs. Based on the formula, as of 2024 the City Council must plan for at least 642 new homes to be built in Exeter each year. This means that at least 12,840 homes are needed over the twenty years of the Exeter Plan.
- 6.4 Policy H1 sets out our proposed approach to meeting the housing requirement for Exeter, identifying four sources of housing supply between 2021 and 2041. The total supply of 13,975 homes for twenty years allows for a healthy headroom above the requirement of 642 new homes per year. This headroom will allow for choice and competition in the housing market and means 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.
- Just over 2,300 homes have been built in Exeter since April 2021 and planning consents (including permissions awaiting Section 106 Agreements) are in place for a further 5,300 homes approximately. In addition, we anticipate that around 1,000 homes will be built on windfall sites during the Plan period. This is based on the average annual number of homes built on windfall sites in Exeter over the past ten years.
- 6.6 As Policy H1 shows, to meet the housing requirement and provide for choice and competition in the market we are allocating sites for around 5,370 new homes. As well as housing, larger sites will provide employment and various other uses and infrastructure to ensure high quality new neighbourhoods.
- 6.7 The 2024 Exeter Five Year Housing Land Supply Statement shows that the City Council can currently demonstrate a housing land supply of just under five years and seven months (including the contribution made by purpose built student accommodation). Based on planning applications in the pipeline and progress that is already being made towards delivering homes on some of the site allocations, the City Council is confident that it will be able to demonstrate a five year housing land supply at the point of adopting the Exeter Plan. Further information, including a housing trajectory, is provided in the Monitoring and Implementation chapter of the Plan.

H1: Housing requirement (Strategic policy)

The City Council will target the delivery of at least 642 homes per year between 2021 and 2041. To meet this target and allow for choice and competition in the market, delivery of 13,975 homes is proposed from the following sources:

- A total of 2,311 completions in 2021/22, 2022/23 and 2023/24;
- Approximately 5,289 homes from existing planning consents;
- Approximately 5,369 homes on site allocations; and
- Approximately 1,006homes on windfall sites.

Housing allocations

- 6.8 Policy H2 lists the development sites that the Exeter Plan allocates to help meet the housing requirement and also provide choice and competition in the market. In line with the spatial strategy set out in Policy S1 there is a focus on strategic mixed use brownfield sites located close to the city centre and key transport hubs, with good access to green infrastructure including our Valley Parks. Further details of how the strategic mixed use brownfield sites should be developed are provided in the Site Allocations chapter of the Plan.
- The list also includes some greenfield sites within the urban boundary and supports small and medium sized builders by enabling at least 10% of the housing requirement to be met on sites no larger than one hectare. Taken together, the sites provide a good balance of location and scale to enable the stable provision of homes over the twenty years of the Plan.

- 6.10 The five strategic mixed use brownfield development sites in Policy H2 were included in full or part in the original Liveable Exeter initiative. The Liveable Exeter sites at Sandy Gate, West Gate, Marsh Barton and North Gate are not allocated (in full) in the Plan due to development constraints, limited site promotion and multiple landownerships. The parts of these sites which are allocated are being promoted. In addition, the northern part of Marsh Barton and North Gate present opportunities for long term regeneration. As such they are identified as regeneration opportunity areas in Policy H3 but are not relied on to deliver any of the housing requirement.
- 6.11 The housing capacities in Policy H2 are net of any existing homes on a site.
- 6.12 Housing development on windfall sites and residential gardens within the urban boundary will be supported subject to consideration of all relevant policies in the development plan. Proposals on these sites will generally be expected to reflect the pattern of the streets and buildings, plot sizes and the ratio of built form to garden in the surrounding area, although innovative designs can also sometimes help to achieve an acceptable solution that respects an area's character. Proposals for residential annexes that do not have a physical or functional link with the main home will be assessed as new homes.

H2: Housing allocations and windfalls (Strategic policy)

The following sites are allocated in the Exeter Plan for the provision of new homes, with associated infrastructure:

Strategic mixed use brownfield sites

Site	Reference	Number of homes
Water Lane	15	1,861
East Gate	145	609
Red Cow	146	442
Exe Bridges Retail Park	142	201
South Gate	46	81

Predominantly residential sites: large scale

Site	Reference	Number of homes
Land at Old Rydon Lane	90	357
St Bridget Nurseries	83	350
Heavitree Road Police Station	104	350
Mary Arches Multi-Storey and Surface Car Park	163	154
Whipton Community Hospital	64	110

Predominantly residential sites: major

Site	Reference	Number of homes
Rougemont Switching Centre	151	86
Land at Newcourt Road, Topsham	91	69
Land adjoining Silverlands	18	67
Land to the west of Newcourt Road	94	56
Land at Topsham Golf Academy	95	54
Land at Exeter Squash Club, Prince of Wales Rd	26	48

Land and buildings at Victoria Street	150	47
12-31 Sidwell Street	51	45
Land to the east of Newcourt Road 2, Topsham	153	45
Belle Isle Depot, Belle Isle Drive	72	40
Clifford Close	63	33
Gypsy Hill Hotel	165	28
Unit 1 Nightclub, Summerland Street	160	28
Land behind 66 Chudleigh Road	125	27
Chestnut Avenue	75	24
East of Pinn Lane	106	24
Land at Matford Lane 2	158	21
Hessary, Hollow Lane	108	17
Fever and Boutique, 12 Mary Arches Street	100	15
Land south of Gypsy Hill Lane	107	14
Land at Hamlin Lane	60	13
Garages at Lower Wear Road	84	12
88 Honiton Road	110	10

Residential sites: minor

Site	Reference	Number of homes
Newbery Car Breakers	129	8
Lancelot Road	31	7
Land rear of Beacon Lane shops	30	6
Land at Taunton Close	13	5
91-97 Wonford Street	73	5

The principle of housing development on unallocated windfall sites within the urban boundary will be supported.

Regeneration opportunity areas

6.13 In accordance with the spatial strategy's focus on brownfield development at optimal densities, the City Council will support the regeneration of brownfield land as set out in Policy H3. This includes proposals for redevelopment within the regeneration opportunity areas at North Gate and the northern part of Marsh Barton, two sites which were originally included in the Liveable Exeter initiative, although opportunities for regeneration may occur anywhere within the urban boundary.

H3: Regeneration opportunity areas (Strategic policy)

Development proposals for residential and a wider mix of uses that make more efficient use of brownfield land will be supported where they:

- a. Deliver sustainable development that conforms to the spatial strategy;
- b. Enhance the urban environment;
- c. Achieve acceptable levels of amenity for new and existing residents;
- d. Avoid adverse impacts on the operation of existing uses; and

e. Ensure no loss of employment floorspace.

Opportunities for regeneration may occur anywhere within the urban boundary. However, specific potential is identified in the Marsh Barton and North Gate Regeneration Opportunity Areas.

Affordable housing

- 6.14 In meeting the housing requirement, it is important that we help to deliver the variety of homes that our communities need. This includes affordable homes, which are particularly important at this time when the costs of living are high and when many people face difficulties in paying everyday bills.
- 6.15 Affordable housing is defined more fully by the Government in the National Planning Policy Framework (NPPF), but can be summarised as subsidised housing for people whose needs are not met by the market. Broadly it includes:
 - Affordable housing for rent: This includes homes for social rent and affordable rent, which are managed by a Registered Provider and let with subsidised rents. Social rent homes have the highest level of subsidy (typically rents are 40% lower than market rents) and therefore the lowest rent. This type of affordable housing also costs the most to provide.
 - Affordable home ownership: These homes give the occupants the option to buy at subsidised prices in various ways, either immediately or after some years of living in the properties. First Homes are one type of affordable home ownership, comprising new properties built as part of larger housing developments that are sold with a discount from market prices of at least 30%. The discount is retained each time the property is sold. Other affordable home ownership products include shared ownership, where the occupant buys a proportion of the equity and a Registered Provider owns the remainder and rent to buy.
- 6.16 The targets and tenure split in Policy H4 are set in light of the need for affordable housing in the city identified by the 2024 Exeter Local Housing Needs Assessment (LHNA) and the viability assessment of the Plan. The latter concludes that different affordable housing targets must be set for brownfield and greenfield sites to ensure that residential development in Exeter is viable. Overall, it is likely that Policy H4 will deliver approximately 20% of homes as affordable, while grants and other subsidies will be used to increase the number of affordable homes delivered. The types of housing development to which Policy H4 applies include new build, conversion and mixed use schemes, phased developments, developments by Registered Providers and other proposals for self-contained homes (e.g. some types of supported housing and homes for older people such as extra care and retirement/assisted living housing). Policy H4 does not apply to build to rent housing, co-living or purpose built student accommodation. Specific affordable housing requirements for build to rent and co-living are set out in Policies H5 and H6.
- 6.17 When applying the target percentages in the policy, the affordable housing requirement may not equate to a whole number of homes. In order to make up the balance, a financial contribution will be sought to provide part of an affordable home based on a methodology to be published on the City Council's website, with costs updated annually. Contributions will be used by the City Council for the provision of

affordable housing in Exeter. In line with Policy H15, the City Council will negotiate development at a higher density where it considers that the number of dwellings proposed for the site is not optimal. This may increase the affordable housing requirement. When applying the tenure percentages in the policy, calculations will be rounded to the nearest whole number.

- 6.18 The City Council will only accept a departure from the percentages if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant. Where the City Council accepts a less than policy compliant amount of affordable housing on grounds of viability, an overage clause will be sought in the Section 106 Agreement in respect of future profits and affordable housing provision. The need for an overage payment will be established through the submission of a development account by the developer once the scheme has been completed. The City Council may also reappraise viability on subsequent phases of large schemes.
- 6.19 Other than where a proposal generates a requirement for part of an affordable home, the City Council expects affordable housing secured under Policy H4 to be provided onsite. Affordable homes provided onsite should be grouped in clusters of no more than ten units spread across the site. Off-site provision or a financial contribution in lieu will only be agreed by the City Council in exceptional circumstances, for example because it will result in a better mix of housing tenures in a locality. In these cases, the affordable housing contribution will be calculated on the basis that the proposed market homes represent 85% (in the case of brownfield developments) or 65% (in the case of greenfield developments) of the total number of homes to be provided. Contributions will be used by the City Council for the provision of affordable housing in Exeter.
- 6.20 Affordable homes secured under Policy H4 should be delivered without public subsidy and (with the exception of First Homes) be disposed of to a locally operating Registered Provider agreed with the City Council. The affordable homes must be made available to eligible and qualifying households in need of affordable housing in accordance with the City's Council's published criteria or to essential local workers. At least 10% of the affordable homes will be expected to meet wheelchair user accessibility standards as required by Policy H14. Should the affordability restriction on an affordable home be lifted, the subsidy will be recycled to provide new affordable housing in Exeter as approved by the City Council.
- 6.21 In addition to seeking affordable housing through Policies H4, H5 and H6 the City Council will deliver additional affordable housing through a series of other mechanisms:
 - Delivering five hundred new affordable Council homes by 2030 as per the Exeter Council Housing Strategy;
 - Working proactively with Homes England to leverage additional funding for affordable housing;
 - Working proactively with Registered Providers; and
 - Working closely with Devon County Council to link affordable housing with extra care housing delivery.

H4: Affordable housing (Strategic policy)

Affordable housing will be required on developments of ten homes or more or with a site area of 0.5 hectares or more, in accordance with the following targets, tenure split and requirements:

Greenfield land:

Minimum percentage of homes to be provided as affordable housing: 35%

Affordable housing tenure split: social rent: 50%; affordable home ownership: 50%

Brownfield land:

Minimum percentage of homes to be provided as affordable housing: 15%

Affordable housing tenure split: social rent: 50%; affordable home ownership: 50%

- a. Where it is not viable to provide the full amount of affordable housing for social rent, the provision of housing for affordable rent will be considered, let as far as possible at social rent levels;
- b. To meet local needs, at least 30% of any First Homes delivered to meet the affordable home ownership requirement should be sold at a discount from market prices of at least 50%;
- c. The affordable homes must be retained as affordable in perpetuity;
- d. The City Council may accept the provision of affordable serviced plots for custom and self-build homes, supported homes, homes for older people and accommodation for Gypsies and Travellers as contributing towards the affordable housing requirement, provided that these homes comply with the definition of affordable housing in the National Planning Policy Framework and the requirements of this policy;
- e. The affordable homes must be provided onsite other than in exceptional circumstances agreed by the City Council;
- f. The size mix of the affordable homes must reflect local need, as evidenced by the City Council's latest Local Housing Needs Assessment;
- g. The affordable homes must be fully integrated with, of the same high quality design as, and completed proportionally with, the market homes; and
- h. If the development is eligible for Vacant Building Credit, the applicant must set out this evidence in a Vacant Building Credit Statement.

Build to rent

6.22 Build to rent is high quality housing comprising self-contained homes that are purposely built for private sector rent, although the homes can form part of a larger multi-tenure development. Schemes offer long tenancy agreements of three years or more and are professionally managed, in single ownership and management control. Residents are usually households that can afford to buy a home on the open market, but choose not to for varying reasons. Build to rent can play a role in meeting the need for high quality, well managed and secure private rented housing in Exeter.

- 6.23 Planning applications for build to rent must be accompanied by a Management Plan to be agreed with the City Council and secured through a Section 106 Agreement. The Management Plan must show how the scheme will be managed and maintained to a high quality and to provide acceptable levels of amenity to neighbouring residents. Matters to be covered will include:
 - On-site management arrangements;
 - Security and fire safety procedures;
 - Move-in and move-out arrangements;
 - The maintenance and cleaning of communal internal and external areas; and
 - The management of refuse facilities and deliveries.
- 6.24 Affordable housing on build to rent schemes should be provided in the form of affordable private rent, unless the City Council agrees that an alternative type of affordable housing is appropriate. In accordance with Planning Practice Guidance, Policy H5 requires 20% of homes on build to rent schemes to be for affordable private rent. When applying this percentage, the calculation will be rounded to the nearest whole number. Where the City Council accepts a less than policy compliant amount of affordable private rent on grounds of viability, an overage clause will be sought in the Section 106 Agreement in respect of future profits and affordable private rent provision. The need for an overage payment will be established through the submission by the developer of a development account once the scheme is completed. The City Council may reappraise viability on subsequent phases of larger schemes.
- 6.25 Policy H5 requires affordable private rents to be at least 20% below private market rents (inclusive of service charges) for the same or equivalent properties. However, wherever possible the City Council's strong preference is for affordable private rents to be set at Local Housing Allowance Level, so that the homes are genuinely affordable. The City Council will also encourage the letting of affordable private rent homes to eligible and qualifying households in need of affordable housing in accordance with its published criteria, or to essential local workers. The rental discount should be retained in perpetuity. However, should the affordability restriction be lifted, a clawback in the Section 106 Agreement will ensure that that the subsidy is captured and recycled to provide new affordable housing in Exeter as approved by the City Council.
- 6.26 The City Council expects the affordable private rent homes secured under Policy H5 to be provided onsite, grouped in clusters of no more than ten units and distributed across the build to rent scheme. Off-site provision or a financial contribution in lieu will only be agreed by the City Council in exceptional circumstances, for example because it will result in a better mix of housing tenures in a locality. In these cases, the contribution will be calculated on the basis that the proposed build to rent homes represent 80% of the total number of homes to be provided. The methodology for calculating financial contributions will be published on the City Council's website, with costs updated annually. Contributions will be used by the City Council for the provision of affordable housing in Exeter.
- 6.27 At least 10% of the affordable private rent homes secured under Policy H5 will be expected to meet wheelchair accessibility standards, as required by Policy H14.

H5: Build to rent

Build to rent housing proposals will be supported when they:

- Provide high quality self-contained homes, designed and built specifically and entirely for rent:
- b. Are held as build to rent for at least fifteen years under a covenant;
- c. Offer tenancies of three years or more to all tenants, with rent and service charge certainty for the tenancy period; and
- d. Are in single ownership and control and professionally managed in accordance with a Management Plan.

On build to rent developments of ten or more homes or with a site area of 0.5 hectares of more, affordable housing in the form of affordable private rent must be provided as follows:

- At least 20% of the build to rent homes must be for affordable private rent, let at a discount from market rents of at least 20% (inclusive of any service charges) and secured as such in perpetuity;
- b. The affordable private rent homes must be owned and managed by the same landlord as the market build to rent homes;
- c. The affordable private rent homes must be provided onsite other than in exceptional circumstances agreed by the City Council;
- d. The size mix of the affordable private rent homes must reflect the local need for affordable housing, as evidenced by the City Council's latest Local Housing Needs Assessment; and
- e. The affordable private rent homes must be fully integrated with, and of the same high quality design as, the market build to rent homes.

Co-living housing

- 6.28 Co-living housing is high quality, managed, large scale (generally at least fifty units) new build or converted accommodation for private sector rent, that is designed to promote communal living and social interaction through the provision of a range of shared spaces and facilities. Co-living differs from houses in multiple occupation (HMOs) due to its generally larger size and because it provides more extensive communal spaces, facilities and services that residents are actively encouraged to use. It differs from hotels and hostels, in particular due to the requirement for minimum tenancies of no less than three months. It also differs from purpose built student accommodation, which is specifically focused on meeting student housing needs and is generally linked to the University of Exeter.
- 6.29 Co-living is a sui generis use; it does not provide self-contained homes and each private unit (e.g. ensuite bedroom or studio) is not required to meet nationally described space standards. However, it is important that co-living offers a high quality living environment and therefore Policy H6 identifies the minimum spaces, facilities and services that proposals must include per resident. The minimum communal spaces and facilities must be appropriately located for all residents for example, residents should have easy access to a communal kitchen and should not have to travel between floors to prepare or eat meals. The minimum communal spaces, facilities and services must also be readily available to residents, with no need to

book and be included in the rent along with all utilities. To help build relations with the local community, some communal spaces and facilities (for example, restaurants and gyms) may be made available to the wider public where appropriate. The amount and nature of space provided for refuse facilities must meet the City Council's standards.

- 6.30 Planning applications for co-living proposals must be accompanied by a Management Plan, to be agreed by the City Council and secured through a Section 106 Agreement. The Management Plan must show how the co-living scheme will be managed and maintained to a high quality, provide acceptable levels of amenity to neighbouring residents and encourage social interaction. Matters to be covered will include:
 - On-site management/concierge arrangements;
 - Security and fire safety procedures;
 - Move-in and move-out arrangements;
 - Arrangements for over-night guests;
 - The maintenance of internal and external areas;
 - The cleaning of communal and private spaces and operation of linen changing services:
 - The management of refuse facilities and deliveries;
 - The management of facilities for wider public use (if provided); and
 - The provision of activities for residents to encourage social interaction.
- 6.31 Co-living generally provides accommodation for single, young professionals who cannot or choose not to live in self-contained houses, flat shares or HMOs. The 2024 LHNA concludes that co-living could help to address the limited supply of housing for young people in Exeter. As it is not required to meet nationally described space standards, co-living is not suitable as family or affordable housing. However, as co-living is a form of build to rent housing, the City Council will seek a financial contribution in lieu of the onsite provision of affordable private rent housing in accordance with Policy H5. This will be calculated on the basis that the proposed co-living units represent 80% of the total number of homes to be provided. The methodology for calculating financial contributions will be published on the City Council's website, with costs updated annually.
- 6.32 Given the City Council's net zero ambitions and because most of the occupants are likely to be young professionals adopting a car-free lifestyle, co-living developments should be located where day-to-day needs (including employment) can be met without using a private car.
- 6.33 Since the market for co-living accommodation in Exeter is relatively new, applicants must show that consideration has been given to the future use of the building should it become surplus to requirements. For example, adaptations could allow the premises to be used as alternative build to rent housing or office space.
- 6.34 The City Council will publish additional planning guidance to amplify Policy H6 in due course.
- 6.35 As a form of communal housing, co-living will count towards Exeter's housing requirement at a ratio of 1.8:1, in accordance with the Government's Housing Delivery Test Rulebook.

H6: Co-living housing

Co-living development proposals will be supported when they:

- a. Provide high quality accommodation designed and built specifically and entirely for rent;
- b. Provide each resident with a private ensuite bedroom or studio that affords adequate functional living space and layout and is not a self-contained home or capable of being used as a self-contained home;
- c. Include the following minimum communal spaces and facilities at a sufficient quantity to meet the needs of the total number of intended residents and located to provide each resident with convenient access:
- A kitchen;
- Other internal space for dining and socialising;
- Collaborative workspace;
- Outdoor amenity space (roof terrace and/or garden);
- · Laundry and drying facilities; and
- Storage and refuse facilities.
- d. Deliver a financial contribution towards the off-site provision of affordable housing in accordance with Policy H5;
- e. Are located within a controlled parking zone and are well connected to employment and local services and facilities by walking, cycling and public transport;
- f. Are accompanied by a Transport Statement/Transport Assessment and Travel Plan and include no private car parking other than for blue badge holders;
- g. Incorporate appropriate facilities for bike storage, vehicle drop off and pick up and service vehicles;
- h. Are in single ownership and control;
- Are professionally managed in accordance with a Management Plan that includes a regime for cleaning, waste management and collection, maintenance, security and the provision of social activities;
- j. For all of the units, provide minimum tenancy lengths of no less than three months and offer all-inclusive rent: and
- k. Are future-proofed in terms of design to support potential alternative uses as appropriate.

Custom and self-build housing

6.36 A custom or self-build home is a home commissioned or built by an individual (or group of individuals) for their own occupation, where they have meaningful input into the final design and layout. The Self-Build and Custom Housebuilding Act 2015 requires the City Council to keep a register of individuals and groups who wish to acquire serviced plots of land in Exeter in order to custom or self-build a home and to have regard to that register when carrying out its functions. The City Council also has a legal duty to grant enough planning consents to meet the level of demand for custom and self-build housing expressed by the register. Policy H7 is the primary means by which the City Council intends to meet that legal duty.

- 6.37 Since the City Council's register was opened in 2016, demand has been expressed for around twenty custom and self-build serviced plots per year by residents of Exeter and people living further afield. An annual demand for around twenty serviced plots per year equates to a demand for approximately four hundred plots over the Plan period.
- 6.38 A serviced plot can be an area of land on which the buyer can develop their home, or another form of customisable unit (for example, an apartment shell) that the buyer can self-finish or move into having had meaningful input into matters such as the exterior materials and interior layout, specifications and fittings. However, in all cases a serviced plot must include the following infrastructure, to be provided by the developer of the wider site:
 - Access to/from the public highway. The plot does not need to adjoin the public highway, but it must have a guaranteed right of access and this should be sufficiently easy to facilitate the delivery of bulky materials during construction; and
 - Electricity, water and waste water connections. Services must be provided to the boundary of the plot so that connections can be made during construction, or adequate alternative arrangements must be possible such as the use of a cesspit rather than mains drainage.
- 6.39 Serviced plots secured under criterion 'a' of Policy H7 must be provided onsite and made available for sale to a custom or self-builder before construction has commenced on 50% of the other homes on the site. When applying the percentage in the policy, the calculation will be rounded to the nearest whole number. On phased developments that meet the policy threshold of twenty homes, each phase should meet the percentage requirement. The City Council will only accept a departure from the percentage requirement if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant. Financial contributions in lieu of on-site provision will only be considered acceptable where the City Council agrees that onsite provision will prejudice delivery of the wider scheme. Financial contributions will be based on up to date evidence of custom and self-build plot values.
- 6.40 Applicants should offer a range of serviced plot sizes. These should be clustered together, clearly marked out and not crossed by services or rights of way. To ensure high design quality, the City Council may require applicants to prepare design codes and plot passports for schemes involving custom and self-build housing. These may be secured by means of a condition at outline planning application stage. Detailed (i.e. full or reserved matters) planning applications must include sufficient information to show that the initial homeowner has had primary input into the final design and layout of the home.
- 6.41 The City Council will require plots to be marketed in accordance with a strategy and valuation that it has approved. If a serviced plot has not been sold at the end of the marketing period, the City Council may accept its return to an open market unit.

H7: Custom and self-build housing

Custom and self-build housing will be supported:

- a. On development proposals of twenty or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders; and
- b. On windfall sites within the urban boundary if desired by the landowner.

Custom and self-build housing developments will be required to deliver affordable housing in accordance with Policy H4.

Plots for custom and self-build housing will be provided as follows:

- A range of plot sizes must be provided having regard to demand expressed by the City Council's custom housebuilding register. The plots must be integrated within the wider development;
- b. Plots for detached homes must have scaffold margins within the plot boundary and be free of party wall requirements;
- c. Prior to marketing, each plot must be developable by a custom or self-builder, with no constraints to prevent immediate purchase and development. The City Council must be satisfied that legal access and servicing will be possible for plot purchasers before outline or full planning permission is granted; and
- d. Each plot must be actively and appropriately marketed for at least twelve months from it being fully serviced and developable.

Homes for older people

- 6.42 The United Kingdom's population is aging and Exeter is no exception. People can also expect to live healthier lives for longer than previous generations. It is therefore important that we support the provision of homes for older people and, in particular, homes that allow people to live as independently as possible for longer.
- 6.43 Specialist housing for older people is age-restricted accommodation including, but not limited to, general market housing, retirement/sheltered housing, extra care housing and residential care/nursing homes. Each of these types of accommodation generally offers a different degree of care and support to residents. The 2024 LHNA concludes that specialist housing (excluding care homes) for older people aged 75 years or more represents 7% of Exeter's local housing need, of which around 20% comprises a need for housing with care (e.g. extra care housing) and around half derives from people in need of affordable housing. Policy H8 supports the provision of good quality specialist homes for older people to help address this need, although some of the need may also be met through the delivery of more adaptable and accessible homes under Policy H14. Discussions with Devon County Council have identified the need for two extra care housing schemes of seventy units each in Exeter, including one at Water Lane. The City Council and Devon County Council will work together to support this provision. This will continue the partnership approach which delivered the Passivhaus Edwards Court extra care scheme in 2022.
- 6.44 Where relevant, specialist homes for older people should be located within easy walking distance (ideally no more than 400 metres) of local shops, services and facilities, including a bus stop or train station. The topography of the site and

- surrounding area should be relatively flat and dropped kerbs and pedestrian road crossings should be provided to enable ambulant older people and users of wheelchairs and mobility scooters to access the local area. Communal facilities and accommodation for essential staff should be provided onsite.
- 6.45 Self-contained homes for older people are required to deliver affordable housing in accordance with Policy H4. However, given the findings of the 2024 LHNA, particular support will be given to proposals that deliver affordable housing in excess of policy requirements and where the applicant can demonstrate close working with Devon County Council on the provision of care packages for residents (where relevant). Affordable homes for older people may also be provided to meet the affordable housing requirements arising from Policy H4, subject to the homes complying with the definition of affordable housing in the NPPF and the requirements of Policy H4.
- 6.46 Homes for older people should adhere to the accommodation standards in annex 8 of the Government's Supported Housing: National Statement of Expectations. Residential care and nursing homes are forms of communal housing and will therefore count towards Exeter's housing requirement at a ratio of 1.8:1, in accordance with the Housing Delivery Test Rulebook. Self-contained homes for older people will count at a ratio of 1:1.

H8: Homes for older people

Development proposals for homes for older people which meet an identified need will be supported when they:

- a. Are of good quality and designed to meet the support and care needs of the residents, enabling them to retain their independence;
- b. Are well connected to local shops, services and community and support facilities, including health facilities and public transport;
- c. Provide suitable levels of safe storage and charging facilities for residents' mobility scooters:
- d. Make appropriate provision for refuse storage, management and collection;
- e. Provide accessible pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances; and
- f. In the case of self-contained homes for older people, deliver affordable housing in accordance with Policy H4.

Supported housing

- 6.47 Supported housing encompasses a wide range of accommodation for people with support needs. It includes, but is not limited to, housing for children in care, young people leaving care or with other support needs, people with physical and learning disabilities or those with mental health challenges who require additional support or for whom independent living is not possible, victims of domestic abuse, rough sleepers and people leaving hostels and refuges.
- 6.48 There is a shortage of supported housing in Exeter, in quantity, range and affordability. Evidence also indicates that the need for housing for people who may need support will increase in the city over the Plan period. For example, the Institute for Public Care predicts a growing number of younger adults (aged 18 to 64 years) with physical and learning disabilities and mental health challenges between 2023

and 2040; and the City Council's Homelessness and Rough Sleeping Prevention Strategy 2023-2027 notes that rough sleeping continues to be one of Exeter's more visible symptoms of acute homelessness, despite significant local and national investment in recent years.

- 6.49 Policy H9 supports the provision of good quality supported housing for which there is an identified need and sets out requirements that new developments must meet (subject to the intended resident group. For example, criteria c and d of the policy may not apply to housing for young people leaving care). Self-contained supported housing will be expected to deliver affordable housing in accordance with Policy H4, although particular support will be given to proposals that deliver affordable housing in excess of policy requirements and where the applicant can demonstrate close working with Devon County Council on the provision of care packages for residents (where relevant). Affordable supported housing may also be provided to meet the affordable housing requirements arising from Policy H4, subject to the homes complying with the definition of affordable housing in the NPPF and the requirements of Policy H4.
- 6.50 All supported housing should adhere to the accommodation standards in annex 8 of the Government's Supported Housing: National Statement of Expectations. Devon County Council advise that supported housing for younger adults is often best provided in the form of shared houses with space for communal living and a night-time carer, or core and cluster flat/bungalow schemes. Supported housing provided as HMOs will also be assessed against Policy H12.
- 6.51 Shared forms of supported housing will count towards Exeter's housing requirement at a ratio of 1.8:1, in accordance with the Government's Housing Delivery Test Rulebook. Self-contained supported homes will count at a ratio of 1:1.

H9: Supported housing

Development proposals for good quality supported housing which meet an identified need will be supported when they:

- Are designed to meet the support and care needs of the residents and enable them to retain their independence;
- b. Are well connected to local services and community and support facilities, including health facilities and public transport;
- c. Provide suitable levels of safe storage and charging facilities for residents' mobility scooters:
- d. Provide accessible pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances:
- e. Make appropriate provision for refuse storage, management and collection;
- f. Do not result in unacceptable harm to the amenity of neighbouring residents; and
- g. In the case of self-contained supported housing, deliver affordable housing in accordance with Policy H4.

Purpose built student accommodation

- 6.52 The University of Exeter is of great importance to the city's socio-economic and cultural prosperity. The number of full time equivalent students studying at the University's Exeter campuses has increased significantly in recent years, from 11,170 in 2006//07 to 27,280 in 2021/22.
- 6.53 The City Council will support proposals for purpose built student accommodation where they meet the criteria in Policy H10. This is because purpose built student accommodation provides students with good quality, well managed housing and it eases pressure on existing housing. The University guarantees to provide accommodation for first years in University-managed accommodation, so that students are supported during the transition from home life. Since 2006/07, the University and City Council have also shared a target for at least 75% of additional student numbers to be housed in purpose built student accommodation. Progress is being made to achieving this target, with 64% of new students since 2006/7 being housed in purpose built student accommodation by 2022. This target is retained in the Exeter Plan.
- 6.54 The approach to supporting purpose built student accommodation in appropriate locations goes hand in hand with the City Council's planning policy on houses in multiple occupation (HMOs) and the associated Article 4 Direction. The Article 4 Direction restricts the ability to convert regular houses into HMOs, which are often occupied by students, and thereby seeks to encourage students to live in purpose built student accommodation. The restriction covers an area close to the University of Exeter's Streatham and St Luke's campuses and has recently been extended.
- 6.55 Given the City Council's net zero ambitions, purpose built student accommodation should be located where students' day-to-day needs can be met without using a private car and with good connections to the University campuses. Consideration will be given to the potential local impacts of development so that potential issues for amenity are avoided and addressed appropriately in the context of the importance of mixed communities.
- 6.56 Purpose built student accommodation must provide residents with a good standard of amenity. Private bedrooms must be of an adequate size and students must have convenient access to sufficient space for cooking, dining, socialising and working, outdoor amenity space, laundry and drying facilities, cycle parking and storage and refuse facilities. The amount and nature of the space provided for refuse facilities must meet the City Council's standards.
- 6.57 Planning applications must be accompanied by a Management Plan to be agreed with the City Council and secured through a Section 106 Agreement. The Management Plan must show how the whole development will be managed and maintained to a high quality and provide acceptable levels of amenity to neighbouring residents. Matters to be covered will include:
 - On-site management/concierge;
 - Security and fire safety procedures;
 - Move in and move out arrangements;
 - The maintenance of internal and external areas:

- The cleaning of communal and private spaces and operation of linen changing services (if provided);
- The management of refuse facilities deliveries; and
- Appropriate arrangements with environmental health to ensure issues such as noise are addressed appropriately.
- 6.58 The City Council will use Section 106 Agreements to ensure that purpose built student accommodation is solely occupied by students during term time. Lettings to non-students during University holiday periods may be appropriate, for example as accommodation to support University conferences.
- 6.59 Financial pressures on students have increased significantly in recent years. In its report on Higher Education Funding in England (2017), the Institute of Fiscal Studies estimated that on graduation from a three year course, the average student debt nationally was £50,000 rising to £57,000 for students from the poorest backgrounds. Cushman and Wakefield's Student Accommodation Report (2023) concludes that Exeter is one of the most expensive cities for students in the United Kingdom in terms of rents charged for purpose built student accommodation. It is therefore vital that a range of purpose built student accommodation comes forward offering choice within the market to a variety of budgets. This should include a mix including cluster flats and standard bedrooms with shared bathrooms. Less expensive provision will promote equality of access to a university education and help encourage students to occupy purpose built student accommodation instead of HMOs.
- 6.60 Given the uncertainties around future growth in the higher education sector, applicants for purpose built student accommodation must show that consideration has been given to the future use of the building should it become surplus to requirements. For example, adaptations could allow the premises to be used as coliving or build to rent housing, or office space.
- 6.61 In accordance with Planning Practice Guidance, purpose built student accommodation provided as studio flats will count towards Exeter's housing requirement on a 1:1 basis. All other forms of student accommodation will be regarded as communal housing and will therefore count towards Exeter's housing requirement on a ratio of 1.8:1, as the per the Housing Delivery Test Rulebook.
- 6.62 The 2007 University Supplementary Planning Guidance and the 2010 University of Exeter Streatham Campus Masterplan Framework Supplementary Planning Document align with the Exeter Plan and remain as material planning considerations.

H10: Purpose built student accommodation

Development proposals for purpose built student accommodation will be supported when they:

- Are located on the University of Exeter's campuses, in the city centre or on sites that are
 within controlled parking zones and well connected to the campuses, local services and
 facilities by walking, cycling and public transport;
- Provide residents with high quality housing comprising a private bedroom in a cluster flat or studio that affords adequate functional living space and layout, within a wider development that includes sufficient communal facilities, services and external amenity space to meet student needs;

- c. Are accompanied by a Transport Statement/Transport Assessment and Travel Plan and include no private car parking other than for blue badge holders;
- d. Incorporate appropriate facilities for bike storage, vehicle drop off and pickup and service vehicles;
- e. Are in single ownership and control and professionally managed in accordance with a Management Plan; and
- f. Are future-proofed in terms of design to support potential alternative uses as appropriate.

Gypsy and Traveller accommodation

- 6.63 Policy H11 aims to facilitate the provision of accommodation for Gypsies, Travellers and Travelling Showpeople in a way that considers the travelling community's wellbeing and traditional way of life whilst respecting the interests of Exeter's settled community.
- 6.64 The 2024 Exeter Gypsy and Traveller Accommodation Assessment (GTAA) concludes that no new permanent pitches are needed during the Plan period for Gypsies and Travellers who meet the Government's planning definition of a Gypsy and Traveller. The assessment indicates a need for five permanent pitches for households who do not meet the planning definition and one pitch for a household whose status is undetermined. These pitch needs are included in the overall housing requirement and it is expected that they will be met through windfall development. This has occurred in the past and allows members of the travelling community to bring forward sites to meet their specific requirements.
- 6.65 No new permanent plots for Travelling Showpeople are needed in Exeter over the Plan period. In terms of transit provision, the GTAA recommends that temporary or negotiated stopping places are made available at times of increased demand such as fairs or cultural festivals. The City Council and neighbouring local planning authorities are working together to consider a protocol to address transit needs at a sub-regional level, including a method to jointly monitor and manage unauthorised encampments.
- 6.66 Whether permanent or transit, new sites for Gypsy and Traveller accommodation should be designed and located in accordance with Policy H11 and other relevant policies in the Exeter Plan. Sites must be located where the local environment is of a satisfactory quality, so locations adjacent to noisy or polluting land uses or in areas of flood plain will not be suitable. The Designing Gypsy And Traveller Sites Good Practice Guide (May 2008) (The Department for Communities and Local Government) provides a good benchmark for the design of new sites and should be considered alongside Policy H11.
- 6.67 Proposals for permanent Gypsy and Traveller accommodation will be expected to include affordable housing in accordance with Policy H4. Affordable Gypsy and Traveller accommodation may also be provided to meet the affordable housing requirements arising from Policy H4 provided that the accommodation complies with the definition of affordable housing in the NPPF and the requirements of Policy H4.

H11: Gypsy and Traveller accommodation

Development proposals for Gypsy and Traveller pitches or plots for Travelling Showpeople will be supported when:

- a. Suitable onsite facilities are provided including space for parking and storage, children's play, utilities and refuse storage, management and collection;
- b. Safe and convenient vehicular, pedestrian and cycle access to local facilities are available or provided and proposals minimise impacts on the local highway network;
- c. The site provides a suitable environmental quality for the residents;
- d. There is no unacceptable harm to the amenity of neighbouring residents;
- e. The site is within the urban boundary and the proposal does not cause an unacceptable landscape or ecological impact and is not in an area at high risk of flooding;
- f. Occupation is limited to households that meet the Government's published definition of Gypsies and Travellers or Travelling Showpeople, or who are cultural Gypsies and Travellers or Travelling Showpeople; and
- g. In the case permanent accommodation, it delivers affordable housing in accordance with Policy H4.

Residential conversions and houses in multiple occupation

- 6.68 For the purposes of this policy, houses in multiple occupation (HMOs) are defined as residential accommodation occupied by three or more people who form two or more households and who share basic amenities such as a kitchen, bathroom or toilet. HMOs differ from co-living accommodation, which is generally of a larger size (at least fifty units) and provides more extensive communal spaces, facilities and services that residents are actively encouraged to use. HMOs are not purpose built student accommodation, which is specifically focused on meeting student housing needs and is generally linked to the University of Exeter. Some types of supported housing may be HMOs.
- The conversion of an existing building (e.g. a house or guesthouse) to flats or a HMO can make a valuable contribution to the housing stock provided that environmental health standards are maintained, amenity is appropriate, unacceptable highways problems do not result and it does not lead to or exacerbate an over-concentration of HMOs in an area. All licensable HMOs should meet HMO licence standards (including space standards) to ensure an appropriate level of amenity for occupants. In addition, proposals must meet nationally described space standards where they involve converting houses to flats, or changing the use of non-residential buildings to flats or HMOs.
- 6.70 The majority of HMOs in the city are occupied by students studying at the University of Exeter. Existing HMOs are particularly focused in locations close to the University's campuses, which can affect their character and environmental quality. The City Council has introduced an Article 4 Direction in these locations to help manage further increases in the number of HMOs. The Article 4 area was extended in 2024. The Article 4 Direction means that, in these locations, changes of use from Class C3 (dwelling houses) to Class C4 (HMOs occupied by between three and six unrelated people as their only or main residence, who share basic amenities such as a bathroom, toilet or kitchen) will require planning permission. Within the Article 4 area, planning consent for new build or conversion/change of use to a Class C4 or sui generis HMO will not be granted planning consent other than in exceptional

circumstances as set out in the City Council's HMO Supplementary Planning Document (SPD). A map of the Article 4 Direction area is available on the City Council's website. Outside the Article 4 area, planning consent for new build or conversion/change of use to a Class C4 or sui generis HMO will generally not be granted where this will result in or exacerbate an over-concentration of HMOs in the locality. The City Council defines over-concentration as 20% or more of homes in a postcode and adjoining postcodes being HMOs.

6.71 The HMO SPD provides additional guidance on the implementation of Policy H12 within the Article 4 area, the Residential Design Guide SPD provides further details on the City 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 for HMOs and flats.

H12: Residential conversions and houses in multiple occupation

Development proposals for the conversion or change of use of a building to flats or a house in multiple occupation will be supported when they:

- a. Respect the character and appearance of the building and surrounding area;
- b. Will not cause unacceptable harm to the amenity of neighbouring residents;
- Provide high quality housing that includes sufficient external amenity space and functional internal layout and living space to meet the residents' needs, including compliance with nationally described spaces standards (where relevant);
- d. Make appropriate provision for car and cycle parking and refuse storage, management and collection; and
- e. Will not have unacceptable transport impacts.

Unless the City Council is satisfied that there are exceptional local circumstances, development proposals for new build or the conversion or change of use of a building to a house in multiple occupation will not be permitted:

- a. In the Article 4 area; and
- b. Outside the Article 4 area where this will cause or exacerbate an over-concentration of houses in multiple occupation in the locality.

Loss of residential accommodation

6.72 There is a high demand for housing in Exeter and a substantial requirement for new homes. Retaining existing homes and making full use of the existing housing stock complements the provision of new residential sites and helps to ensure a wide choice of homes in accordance with the NPPF. Whilst there may be occasions where other material considerations warrant the loss of residential accommodation, Policy H13 will ensure that existing homes are retained in most cases.

H13: Loss of residential accommodation

Development proposals which result in a net loss of residential units will not be permitted.

Accessible homes

- The number of people in Exeter with limiting long term illnesses or disabilities that affect their housing needs is significant and growing. Accessible housing allows people to stay in their own homes and retain their independence for longer, rather than having to move due to inaccessible housing. Policy H14 is justified by the need for accessible homes in the city.
- 6.74 Policy H14 is relevant to planning applications for all homes created via works to which Part M Volume 1 of the Buildings Regulations applies. At present this comprises all new build homes including affordable homes, build to rent (including co-living), custom and self-build housing, supported and older people's housing, purpose built student accommodation and HMOs. When applying the policy, calculations will be rounded to the nearest whole number.
- 6.75 M4(3) homes should be distributed throughout a development to provide a range of locational choices, aspects, views and unit sizes. Where any part of an approach route (including the vertical circulation in communal areas of a multi-storey development) is shared between dwellings of different categories, the design provisions of the highest numbered category of home served should be applied. This will ensure that residents are not limited by the design of communal areas.
- 6.76 Category M4(3) is subdivided into wheelchair adaptable (a home that can be easily adapted to meet the needs of a wheelchair user) and wheelchair accessible (a home readily usable by a wheelchair user at the point of completion). The City Council will advise developers of any specific M4(3) requirements as early as possible in the planning application process, based on needs at the time and bearing in mind that wheelchair accessible standards can only be required where the City Council is responsible for allocating or nominating a person to live in that home.
- 6.77 The City Council will only accept a departure from the requirements of Policy H14 where it is satisfied that they are not feasible or viable. If a departure is accepted, the City Council will expect the proposed homes to meet Building Regulations M4(1) standards as a minimum.
- 6.78 M4(2) and M4(3) homes will be secured via a planning condition so that the building control body can check compliance of the development against Building Regulations standards.

H14: Accessible homes

New homes (created via works to which Part M Volume 1 of the Building Regulations applies) will be supported when:

- The market homes are built to meet accessible and adaptable standards (Building Regulations M4(2)); and
- b. 10% of the affordable homes are built to meet wheelchair user standards (Building Regulations M4(3)), with the remainder built to meet accessible and adaptable standards (Building Regulations M4(2)).

Housing density and size mix

- 6.79 For Exeter to accommodate its housing requirement, every development involving new homes must make the most efficient use of land. This means optimising the density of housing development so that it is appropriate for the site and surrounding area taking into account constraints such as heritage assets, local amenities and the character of the area and any on-site requirements such as public open space and active travel measures that are needed to ensure that development is of a high quality. The 2021 Exeter Density Study and the 2024 Exeter Views, Density and Heights Study indicate the densities that the City Council will expect new housing developments to achieve.
- 6.80 The housing density of a development is linked to the number of bedrooms provided within each new home. It is important that new housing development includes a mix of house sizes to help meet local needs. The 2024 LHNA indicates that market and affordable homes of all sizes will be needed in Exeter to 2041, but particularly two and three bedroomed properties and significant numbers of one bedroomed homes. Family housing should not be omitted from new developments due to a concentration on densities and the range of proposed house sizes must support the creation or maintenance of mixed communities.

H15: Housing density and size mix (Strategic policy)

Development proposals for new homes will optimise density and incorporate a mix of housing sizes, taking into account:

- Local need, as evidenced by the City Council's latest Local Housing Needs Assessment:
- b. Local context;
- c. The proposed tenure mix of the development; and
- d. The mix of housing sizes in the locality.

Residential amenity and healthy homes

- 6.81 It is important that the amenities of existing residents are not unacceptably harmed by new development. It is also imperative that new homes provide residents with a good standard of amenity and safe and healthy living conditions. Policy H16 is one of a raft of policies in the Plan intended to ensure that new homes provide for healthy communities and are safe. Unless specified elsewhere in this chapter, new homes must meet nationally described space standards. The City Council's Residential Design Guide SPD provides additional guidance on the City Council's approach to ensuring that good standards of amenity are achieved.
- 6.82 Planning is concerned with the control of land use in the public interest. In general, the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light or a view are not material planning considerations.

H16: Residential amenity and healthy homes

Development proposals will be supported when they do not result in unacceptable harm to the amenity of neighbouring residents. New homes must provide safe and healthy living conditions and good standards of amenity for future occupiers. The following factors will be taken into account:

- a. Privacy and overlooking;
- b. The availability of natural light and outlook;
- c. Whether the proposal is overbearing;
- d. Light and air pollution;
- e. Noise and disturbance;
- f. Odour, fumes and vibration;
- g. Security; and
- h. The ability to feel at ease in home or garden.

New homes must also:

- a. Provide sufficient functional internal layout and living space, including compliance with nationally described space standards where relevant;
- b. Include sufficient external amenity space;
- c. Provide sufficient space to store household items, cycles and refuse and sufficient space for refuse collection; and
- d. Be future-proofed for changes in lifestyle and use.



7. Economy and jobs

Vision – An innovative and analytical city

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of being an innovative and analytical city. Encouraging growth and investment in the knowledge economy will support new sectors, develop innovation and increase prosperity.

Vision - A city of accessible world class education

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of delivering accessible world class education. Developing training and skills for all will enable equality of opportunity in new sectors and support economic growth.

Vision - A city of culture

Addressing the need for economic growth and job creation links to the aim in the 2040 vision of creating a city of culture where creative making plays a leading role. Encouraging growth and investment in the creative industries will help build a living city where everyone thrives.

Objective: Develop the potential of the city for economic growth with a particular focus on the knowledge economy and ensure the benefits of jobs, skills and training are available to all.

Introduction

- 7.1 The city is at the heart of the Greater Exeter area and has one of the fastest growing economies in the United Kingdom. The Liveable Exeter initiative sets out a vision for a growing, thriving city where significant housing delivery attracts major business investment and high value jobs. Whilst Exeter has, like all cities, been significantly affected by the Covid-19 pandemic, it continues to bounce back. There is a strong ambition to grow the economy with a focus on innovative business sectors, making the most of a skilled workforce, the benefits of the University of Exeter and the world leading research on climate change. The Exeter Plan needs to support the economy and green growth by identifying the employment space and infrastructure we need. This will help to increase prosperity and wellbeing.
- 7.2 Exeter is a relatively prosperous city and its economy has been growing faster than similar cities over the last two decades. The business growth rate is also strong. Whilst the competitiveness of the city's economy is slightly below the national average, it has increased in recent years.

Economic development needs

7.3 Exeter is part of a wider Functional Economic Market Area (FEMA), consisting of Exeter, East Devon, Mid Devon and Teignbridge. The area reflects Exeter's large travel to work area, the second largest in England. In partnership with these neighbouring local authorities, we have produced an Economic Development Needs Assessment (EDNA) which considers, and reports on, the economic development needs of the area. The work has been undertaken through an analysis of the economic forecasts to establish demand, a review of the current employment land to establish supply and a comparison between demand and supply to reach

- conclusions. Sites are RAG (Red, Amber, Green) rated to indicate their likely prospect of being delivered.
- 7.4 Forecasts consider various scenarios for employment land requirements across the FEMA. There is a forecasted mid-point demand for up to 284 hectares of employment land in the FEMA over the Plan period. The current available supply of sites across the FEMA amounts to 229 hectares of employment land, of which 227 hectares are rated Green or Amber and 2 hectares are rated Red. Therefore, the EDNA concludes that over the twenty year Plan period, there is insufficient employment land currently available in Greater Exeter to meet the forecast demand and more sites need to be allocated in order to meet that demand.
- 7.5 Specifically for Exeter, the EDNA concludes that some of the future economic growth stimulated by the city will need to be accommodated in its hinterland in adjoining local authority areas, which is functionally part of the city area and that future employment growth in areas adjoining the city (the city fringe) could reduce levels of commuting into Exeter itself.
- 7.6 Policies within this chapter maximise the potential of Exeter to contribute to meeting economic development needs by supporting the transformational sectors, retaining established employment areas, delivering new forms of employment provision and allocating new employment sites. The partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to continuing to work together, in accordance with the duty of cooperate, to address any shortfall in employment land and to ensure the continued economic success of the wider area.

Economic growth

- 7.7 There is significant potential in Exeter to take full advantage of the opportunities for economic growth. There will be a particular focus on unlocking further growth potential within the knowledge economy, especially in the transformational sectors.
- 7.8 Transformational sectors that have potential for growth in Exeter include:
 - Data analytics: This is the science of examining raw data using automated means with the purpose of drawing conclusions about that data. This is a specialism which can support innovation across a range of industries. The presence of high performance computing in the Exeter area, together with analytical and research skills in the public and educational sectors, gives a strong foundation for development;
 - Environmental futures: Supported by the data analytics specialism, there is a
 concentration of high level environmental expertise in the area including at the
 Met Office and the University of Exeter. The city is a world leader in climate
 change modelling, research and agricultural technology and locally there is a
 focus on innovation and environmental intelligence. The need for environmental
 innovation has never been higher and Exeter is very well placed to take this
 forward:
 - Health innovation: The Local Industrial Strategy recognises an emerging health innovation cluster in the area, whilst the Royal Devon University Healthcare NHS Foundation Trust and the University of Exeter fund the Joint Office For Clinical

Research. The South West Digital Health Accelerator is based in Exeter to provide support for local digital innovations, including Artificial Intelligence (AI) in the health sector:

- Digital innovation: This includes high growth digital and Al industries such as
 microelectronics, autonomous systems, remote sensing, satellite applications,
 quantum engineering, cyber security and virtual reality. Existing expertise and
 world leading research in these areas provide the building blocks for various
 advanced sectors including engineering, digital health, creative industries, smart
 energy and environmental resilience;
- Green economy: This sector covers industries that deliver clean growth,
 focusing on protecting biodiversity, enhancing sustainability and reducing carbon
 emissions, to help preserve or restore the wider environment. Green jobs within
 this sector include wind, solar or hydrogen engineering jobs, environmental
 technicians, green construction managers, consultancy jobs and many more.
 Growth in these areas is supported by the University of Exeter's Green Futures
 team who are conducting world leading interdisciplinary research and supporting
 businesses in sustainability related sectors and by the new Green Economy
 Centre;
- Creative industries: This is an innovative sector that has the ability to realise
 transformative change. Creative industries are set to become progressively
 important to economic wellbeing as we become increasingly dependent on the
 generation of knowledge through human creativity and innovation. The Council
 for Science And Technology recognises that creativity, design and innovation are
 woven into our national DNA. Exeter is a cultural success story and has long
 been a hub for creative makers and shakers. This is set to continue; and
- Other emerging transformational businesses: A key characteristic of innovation is that it is not predictable, therefore perhaps the greatest potential for growth is in other transformational businesses as yet unidentified.
- 7.9 We will support these new transformational businesses, whether they are spin-offs from the University of Exeter or other local bodies, new start-ups or inward investment by existing firms. Support could be in the form of education and training, through the Building Greater Exeter partnership, or through enabling new infrastructure such as a digital exchange and/or digital hubs. Policy STC9: Digital communications will be important to delivering the digital technology needed to underpin the emerging sectors.
- 7.10 In supporting economic growth, the City Council aims to ensure that all the city's citizens gain from the prosperity and wellbeing generated by the local economy. Evidence indicates that transformational sectors have the potential to make the greatest contribution to increasing productivity and earnings within Exeter. Policy EJ1 takes a flexible and supportive approach by encouraging appropriate development (sustainably located and avoiding conflict with neighbouring uses) within these sectors and highlighting the importance of working with partners to encourage growth and investment.

EJ1: Economic growth (Strategic policy)

Development proposals will be supported where they meet the economic needs of the city as identified in the Economic Development Needs Assessment.

The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge and clean growth economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics;
- Environmental futures;
- Health innovation;
- Digital innovation;
- Green economy;
- Creative industries; and
- Other emerging transformational sectors.

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth in the transformational sectors.

Retention of employment land

- 7.11 The supply of employment land and its protection for employment use play a critical role in responding to the opportunities for economic growth. Existing employment land can often provide space for new employment uses or additional space to allow existing businesses to expand.
- 7.12 The established employment areas make an important contribution to meeting the city's employment needs and will therefore be retained in employment use. Any development or redevelopment should be for employment purposes within Use Class B2 (general industrial), Use Class B8 (storage and distribution) and Use Class Eg (including Eg (i) offices, Eg (ii) research and development and Eg (iii) industrial processes).
- 7.13 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 outside the established employment areas 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 the site being used for employment purposes in the future). Proposals will need to include evidence to demonstrate compliance with the policy. Evidence of non-viability must demonstrate that the site or premises has been actively marketed (appropriate and targeted marketing by a commercial property agent) at a reasonable price (commensurate with the current market price for similar commercial sites/premises) over a twelvemonth period.
- 7.14 Existing employment land can also provide new opportunities for regeneration, combining housing and employment in ways that make more efficient use of land and meet the needs of growth sectors now and in the future. Importantly, such proposals will need to comply with Policy H3: Regeneration opportunity areas.

7.15 Policy EJ2 seeks to protect those established employment areas that are key to meeting our future employment needs, whilst elsewhere allowing for a change of use in certain specific and evidenced circumstances.

EJ2: Retention of employment land (Strategic policy)

The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use.

Elsewhere, the loss of employment land to an alternative use may be considered acceptable where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future.

New forms of employment provision

- 7.16 New forms of employment can also support economic growth. Flexible working is becoming more important and this must be supported by future development. Shared workspaces help to increase employment densities and provide flexible opportunities for SMEs (Small and Medium Enterprises) and traders. Incorporating work hubs, collaborative workspaces (or co-working) and live-work schemes into all strategic mixed use brownfield developments will ensure a truly liveable and sustainable environment and support the national shift to alternative ways of working. Shared use of public and community spaces can also contribute. Community cafes and creative hubs can connect individuals, encourage creativity and enable collaborative working.
- 7.17 It will also be important for all new homes to include home offices or at least be designed in a way that facilitates home working.
- 7.18 Policy EJ3 supports new forms of employment provision and ensures delivery at large scale employment developments.

EJ3: New forms of employment provision (Strategic policy)

To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment development will be supported:

- Work hubs;
- Collaborative workspace; and
- Appropriate live-work schemes.

Strategic mixed-use brownfield development proposals will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.

Access to jobs and skills

- 7.19 Employment is a route to supporting inclusive growth and social inclusion. For people who are not economically active, pathways into employment need to be person specific, providing opportunities to build confidence and personal skills for entering work as well as formal skills and qualifications. The City Council will work with regional and local partners such as the University of Exeter, Exeter College and training providers to build skills and improve pathways to work for young people and disadvantaged groups. The City Council will also work closely with Building Greater Exeter, an initiative that aims to:
 - Inspire new candidates and represent employers at engagement events;
 - Support employers by facilitating recruitment, up-skilling and re-skilling;
 - Deliver social value through employment and skills plans on major developments; and
 - Produce experiences promoting a culture that makes the built environment a great place to work.
- 7.20 Building Greater Exeter works with organisations, appointed contractors and the supply chain and is happy to support those bringing forward new development in the city.
- 7.21 By improving access to employment we will reduce poverty and inequality, increase the city's resilience and enhance the economic and social wellbeing of every community. To support this ambition, development proposals should remove barriers and contribute to enabling access to employment for local residents, developing skills and supporting employment initiatives where:
 - New homes are developed;
 - New workspace and other commercial development is created; or
 - Other major development arises which would generate new employment including during the construction phase.
- 7.22 This will be achieved through the development, submission and delivery of an Employment and Skills Plan for all major developments using the Construction Industry Training Board client based approach which is widely recognised within the industry. These plans contain targets for a range of employment, volunteering and development activities. This will help provide opportunities for local people to experience and join the workforce. Where necessary, for example for outline planning consents, this requirement can be secured by a planning condition or Section 106 Agreement.
- 7.23 Policy EJ4 supports work towards building skills and improving pathways to work for young people and disadvantaged groups.

EJ4: Access to jobs and skills

The City Council is committed to supporting access to employment and learning opportunities, social mobility and city-wide inclusion. Development proposals will be supported when they contribute to:

- a. Enabling access and removing barriers to employment for local residents;
- b. Facilitating skills development and learning opportunities;

- c. Supporting employment initiatives (through work placements, apprenticeships and job creation); and
- d. Social value.

All major development proposals will be required to submit, and deliver the provisions in, an Employment And Skills Plan to demonstrate that the above objectives will be met.

Provision of local services in employment areas

- 7.24 The City Council recognise 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 should also reduce the need to travel. Local services could include a childcare nursery, a medical practice or walk-in centre, a dentist, a chemist, a post office, a bank, cash points, a sandwich bar or a small convenience store for top-up purchases (with retail floorspace not exceeding 500 square metres).
- 7.25 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).
- 7.26 Policy EJ5 supports the provision of local services within employment areas for the benefit of the workforce. The employment area of Southernhay is excluded from the provisions of Policy EJ5, due to its close proximity to existing services in the city centre.

EJ5: Provision of local services in employment areas

Development proposals involving the provision of local services within the established employment areas at Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be permitted when:

- a. The service is designed to support ongoing and viable employment provision;
- b. The service is of a type and size to serve local workforce needs only:
- c. There is insufficient provision to meet local workforce needs through existing services in the area;
- d. It would be located within reasonable walking distance of the local workforce, taking into account new or enhanced routes; and
- e. It would not harm the primary function of the area as a business park or industrial estate.

New transformational employment allocations

- 7.27 New employment sites are allocated in Policy EJ6 to meet the specific requirements of the transformational sectors. Allocating sites which are suitable for transformational employment development can help remove barriers to delivery and act as a catalyst for further growth.
- 7.28 Along with the protection of the established employment areas and the provision of work hubs, collaborative workspace and live-work schemes within the strategic mixed use brownfield allocations, these transformational employment allocations will provide additional floorspace to help meet identified employment demand. Each site has its own characteristics which will impact on the form of development, the approach to delivery and the potential occupants.
- 7.29 The land adjacent to Sandy Park and the land adjacent to Ikea are both sites that are in accessible locations on the eastern side of the city close to Junction 30 of the M5 motorway. The sites' accessibility will be attractive to speculative development for transformational uses and could provide accommodation for start-ups.
- 7.30 The St Luke's site forms part of the University of Exeter's campus and currently provides academic, administrative, sports and social facilities for the University of Exeter. The site will require redevelopment to consolidate health and wellbeing activities and help the University to scale up its biomedical and clinical research and associated commercialisation. Redevelopment of the campus will also strengthen the existing research and teaching links between the University and the Royal Devon and Exeter Hospital. The redevelopment proposals for the site could deliver up to approximately 44,000 square metres of floorspace and may include ancillary purpose built student accommodation where this is demonstrated to be required.
- 7.31 Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Views, Density and Heights Study.
- 7.32 A masterplan/Supplementary Planning Document will be prepared by the City Council and the University to guide the proposals for the site. This will sit alongside the 2010 University of Exeter Streatham Campus Masterplan Framework Supplementary Planning Document.
- 7.33 Most transformational employment uses are within planning Use Class E: Commercial, Business and Service, meaning they can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke soot, ash, dust or grit. A gateway requirement (enforced through condition or Section 106 Agreement) may be imposed to limit the future use of new developments to those within the transformational sectors.

EJ6: New transformational employment allocations (Strategic policy)

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

Site Size of site

Land adjacent to Sandy Park, Newcourt
Land adjacent Ikea, Newcourt
St Luke's Campus, Heavitree Road

4 hectares 4.5 hectares

7 hectares





8. Retail and the future of our centres

Vision – City of culture

Addressing the future of our centres links to the outcome in the 2040 vision of Exeter being a city of culture. Ensuring the continued vitality of the city centre and district and local centres will require a wider variety of uses in these locations, with cultural activities being increasingly important.

Vision – A liveable and connected city

Addressing the future of our centres links to the outcome in the 2040 vision of Exeter being a liveable and connected city. Ensuring the continued vitality of the city centre and district and local centres will mean that communities can thrive and build identity around their local centres.

Objective: Enhance the vitality of the city, district and local centres so they continue to provide a key role in our day-to-day lives, supporting communities, prosperity and cultural identity.

Introduction

- 8.1 Our centres are changing. Traditionally used for retail and work, in recent years the growth of internet shopping has dramatically changed how we use the city centre and our district and local centres (collectively referred to as 'centres'). This change accelerated with the Covid-19 pandemic, meaning that we need a greater focus on the vitality of our high streets so that they continue to play an important role in how we live our lives during the day and into the evening. Shopping is likely to be just one part of this future; a greater variety of uses need to be included in the centres to widen their attractiveness and appeal.
- 8.2 Policy RFC1 recognises the importance of our centres as hubs for the city as a whole and for our local communities more locally and provides the overarching approach to ensuring their ongoing vitality. A more diverse mix of uses and spaces will be a key part of this approach, whilst taking opportunities to promote the city's heritage and bringing nature into the urban environment will build on the centres' existing assets to provide attractive places. Policy RFC1 also sets out the role which the City Council will play in increasing the vitality of the centres, working alongside key partners. The focus for main town centre uses will continue to be our city, district and local centres.

RFC1: The future of our centres (Strategic policy)

The City Council will work with partners to protect and enhance the vitality, viability and resilience of the city centre, district centres and local centres to increase prosperity, provide a wider range of services and minimise the need to travel.

The City Council will support a mix of uses and activities which diversify the offer of the city centre, extend its hours of activity, enhance the night time and visitor economy, improve its cultural offer and ensure its future resilience as the major centre for the sub-region.

The City Council will promote attractive public spaces, provision for nature, enhancements of heritage assets and high-quality facilities for active travel and public transport in our centres, to provide vibrant places for people and increase footfall.

Our centres

- 8.3 Our centres are defined on the Policies Map and include:
 - The city centre (including the primary shopping area at its heart);
 - District centres; and
 - Local centres.
- These centres comprise town centres as defined in the National Planning Policy Framework (NPPF).
- 8.5 Main town centre uses (as defined in the NPPF), including retail, will continue to be a vital component of these centres. However, the variety of uses will broaden in future to ensure the centres continue to play a central part in people's lives. As part of this mix, residential development will help to provide greater viability, increase footfall, lengthen hours of activity, reduce antisocial behaviour and enhance safety in the centres.
- 8.6 Whilst planning policies that actively support a wider range of uses in the centres will enhance their viability, it will also be important to restrict main town centre uses outside of the centres when they do not meet the sequential test and when they would have significant adverse impact on the centres. This needs to be seen in the context of some modest convenience retail provision being considered appropriate in the strategic mixed use brownfield allocations where they will reduce the need to travel.
- 8.7 The role of the city, district and local centres are discussed in turn in this chapter of the Plan.

The city centre

8.8 One of the key reasons for the success of Exeter is its city centre, which provides a strategic retail role for a large hinterland and travel to work area covering large parts of south Devon. The city centre contains a rich mix of thriving businesses, shops, education establishments, historic buildings, public spaces, green spaces, offices and homes making it a vibrant and bustling place to visit, work, live and study. Despite the impact of the Covid-19 pandemic, footfall in Exeter city centre has

- recovered well and vacancy rates are relatively low. This reflects Exeter's status as a regional centre for a large surrounding area.
- 8.9 Looking forward, it will be vital to widen the way the city centre is used. It will need to provide liveable spaces which are attractive and people-friendly, so that the whole community wants to spend time there. It will need to be effectively connected to the rest of the city and its neighbourhoods so that people can travel there easily. It will need to be the cultural heart of the city, building on local identity and providing appropriate venues and public spaces to enable culture to flourish. It will need to celebrate the historic environment and local character through the provision of high quality buildings and public spaces, ensuring that heritage assets, their settings and historic streetscapes are conserved and enhanced. It will need to incorporate more green space and enhance places for nature. It will need to diversify, so that the whole community wants to spend time there and so that it can respond to future change. And finally, it will need to provide more homes and jobs in order to create a genuinely liveable neighbourhood. Because we recognise the importance of this issue, one of the key strands of the spatial strategy is to focus development in areas close to the city centre.
- 8.10 The City Council is currently working on a new city centre strategy which will set the direction for the city centre over the coming years, as a place to live, work, visit, shop, study and socialise. This work is reflected in the Exeter Plan.
- 8.11 Policy RFC2 determines the approach to development within and affecting the city centre. The primary shopping area is at the heart of the city centre and includes the High Street, Princesshay, Fore Street, Sidwell Street and Queen Street. Retail proposals will be supported here. Proposals for wider main town centre uses will also be supported where they provide a complementary mix of uses, improve vitality and enhance the historic, natural and cultural environments. A secondary shopping area, as was identified in the Exeter Local Plan First Review, is not included in the Exeter Plan.
- 8.12 Beyond planning policy, revisions to the Use Classes Order made in 2020 grouped a much larger variety of commercial uses in Class E. Retail, food and drink, financial and professional services and various other commercial uses are now grouped together. Planning permission is not required for changes of use within the same use class. This means that many types of changes of use no longer require planning permission.

Our district and local centres

- 8.13 Whilst the city centre plays a crucial, strategic role for Exeter and the wider area, our district and local centres provide the shops, facilities and services which are used by our communities on a daily basis. The district centres sit between the local centres and the city centre and provide a wide variety of facilities and services. The local centres are located across the city, are smaller and provide a more limited, yet vital, range of facilities and services.
- 8.14 A high level review of the city's centres has been undertaken. This has resulted in a small number of additional local centres being identified. Some of the existing local centres have also been renamed to clarify their location. The list of district and local centres is set out below:

District centres

- Topsham;
- Heavitree; and
- St. Thomas.

Local centres

- Northern end of Sidwell Street / Blackboy Road;
- Mount Pleasant:
- Magdalen Road;
- Topsham Road Countess Wear;
- Beacon Lane:
- Polsloe Bridge;
- Pinhoe;
- Whipton;
- Exwick:
- Isleworth Road;
- Alphington;
- The Quay and Canal Basin;
- Burnthouse Lane:
- Topsham Road St Leonard's; and
- Countess Wear.
- 8.15 The changing way people live their lives and use local facilities will have an impact on how our district and local centres need to evolve over time. Similar to the city centre, these centres will need to provide for a greater variety of uses so they are resilient and can respond to change. On this basis, they will need to provide for more than just shopping.
- 8.16 Ensuring that these centres continue to thrive by providing retail, employment and easily accessible local facilities will reduce the need to travel, increase the potential for access by active travel and foster strong local identities and community spirit. Finally, providing easily accessible local facilities to the whole community will help to reduce inequalities.
- 8.17 Policy RFC2 sets out the approach to development within and affecting the district and local centres. Retail proposals will be actively supported in these centres, whilst proposals for other main town centre uses will be supported as part of a complementary mix of uses taking into account the impact on the local historic, natural and cultural environments.

Retail provision in the strategic mixed use brownfield allocations

- 8.18 The focal points for the main town centre uses, including retail, will be the city, district and local centres. However, it will be vital to ensure that the larger development areas provide some small scale local retail provision to provide convenient options for the new neighbourhoods, reduce the need to travel and help build local communities.
- 8.19 Policy RFC2 sets out the approach to be taken to retail provision in the mixed use brownfield allocations. Small scale convenience retail provision of up to 500 square metres net sales area will be supported where the proposals reduce the need to

travel. This approach aims to support shops such as local convenience stores. Proposals for larger scale and comparison retail are unlikely to be appropriate in the mixed use brownfield allocations because this type of development will draw customers from a wider area, encouraging longer travel distances and potentially competing with the centres.

Out of centre retail

- 8.20 During the 1980s and 1990s, many towns and cities experienced significant growth in out of town/out of centre shopping developments. This trend allowed customers to travel by car to large stores with significant amounts of parking. Out of town shopping centres compete with existing centres and can undermine their success in a similar way to the more recent growth of online shopping. Out of centre shopping discourages active travel and limits the associated health benefits, relies on car use which will make achieving our net zero ambitions very challenging, is very land-hungry and often leads to the creation of low quality places. Finally, out of centre shopping can lead to challenging inequalities because of the potential to exclude those groups who cannot afford the costs of car travel.
- 8.21 Policy RFC2 sets out that main town centre uses will not normally be considered acceptable outside of the centres unless they meet the sequential test. This reflects that main town centre uses should be located in our centres, then in edge of centre locations (as defined by the NPPF) and only if suitable sites are not available should out of centre sites be considered.
- 8.22 Furthermore, for retail and leisure proposals of more than 1,250 square metres gross internal area, the impact of the proposals on relevant centres will need to be considered in an Impact Assessment. In addition to passing the sequential test and demonstrating acceptability through an impact assessment, if proposals are to be considered acceptable, they will have to make high quality provision for sustainable travel and placemaking.

RFC2: Development in, and affecting, our centres (Strategic policy)

Development proposals for retail uses will be supported in the primary shopping area and district and local centres.

Development proposals for convenience retail provision of up to 500 square metres of net sales area will be supported as part of a wider mix of uses in the strategic mixed use brownfield allocations where it is demonstrated that the proposals will minimise the need to travel and provide access in accordance with the transport hierarchy.

Development proposals for main town centre and residential uses will be supported in the city, district and local centres where there is robust evidence that they will:

- a. Provide a complementary mix of uses to support the retail, leisure and service functions of those centres;
- b. Enhance the viability, vitality and resilience of those centres; and
- c. Conserve and enhance the cultural, historic and natural environments of the centres.

Outside the city centre, district and local centres, development proposals for main town centre uses will not be permitted unless the proposals meet the sequential test and, for retail

and leisure uses of more than 1,250 square metres gross internal area, it is clearly demonstrated in a robust Impact Assessment that the proposals will not have a significant adverse impact on investment in, and the vitality and viability of, the centres in the catchment of the proposal. Development proposals will be required to make provision for high quality active travel, public transport and a high quality and resilient public realm.





9. Sustainable transport and communications

Vision - The most active city in the United Kingdom

Addressing sustainable transport and communications links to the outcome in the 2040 vision of Exeter being the most active city in the United Kingdom. Delivering development in the right locations and with attractive walking and cycling links will maximise active travel and improve health and wellbeing.

Vision - A liveable and connected city

Addressing sustainable transport and communications links to the outcome in the 2040 vision of Exeter being a liveable and connected city. A focus on minimising the need to travel, active travel and linking travel and placemaking will support Exeter as a liveable city.

Vision - A leading sustainable city

Addressing sustainable transport and communications links to the outcome in the 2040 vision of Exeter being a leading sustainable city. Minimising car use and promoting active travel and public transport will help to achieve the ambition of Exeter being a net zero city by 2030.

Objective: Deliver development in appropriate locations with high quality infrastructure to minimise the need to travel, maximise sustainable transport and support emerging forms of mobility to improve health, placemaking and to support net zero.

Introduction

- 9.1 The way we travel will be vital to the success of Exeter. It will be central to achieving net zero carbon, growing prosperity, healthy lifestyles and making improvements to our natural and historic environments. In future, travel will not just be about whether we walk or drive, digital communications will also be vital. The Exeter Plan will need to ensure that the city is resilient to changes in travel, supporting innovative development in the right places, providing real options and promoting fresh approaches to transport.
- 9.2 The Exeter Plan will also work alongside the Devon And Torbay Local Transport Plan 4 to ensure momentum is maintained to deliver infrastructure that supports healthier, active lifestyles and responds positively to the climate emergency and evolving national guidance on transport infrastructure delivery. Working with partners will be vital to continue this work.
- 9.3 In addition to the transport specific policies included in this chapter, a central way in which the Exeter Plan will influence travel is through the spatial strategy included in Policy S1. Focusing significant development on brownfield sites close to the city centre and on transport routes will minimise the need to travel and facilitate sustainable modes. This closely aligns with key principles of the National Planning Policy Framework (NPPF).

Sustainable movement

- 9.4 Addressing development and travel in Exeter requires joined up thinking and aligned policies. The City Council is working with partners including Devon County Council as the local transport authority, East Devon, Teignbridge and Mid Devon District Councils, National Highways, Network Rail and bus and train operators to ensure we have consistent aspirations and approaches. This work with partners means that the content of the Exeter Plan, the Exeter Transport Strategy, the Exeter and Devon Countywide Local Cycling And Walking Infrastructure Plans, the Local Transport Plan 4, the Bus Service Improvement Plan and other strategies are consistent.
- 9.5 More specifically, a transport modelling process is currently being progressed by Devon County Council and National Highways to assess the transport impact of development in the wider area covering Exeter, East Devon, Mid Devon and Teignbridge. This will underpin a coordinated transport strategy for the Exeter catchment area, with the city at its core.
- 9.6 Policy STC1 on sustainable movement sets out an overarching approach to ensuring development and transport work together to achieve the ambition of being a net zero carbon city by 2030, support growth, improve accessibility and enhance the local environment. It identifies the importance of siting development in appropriate locations to minimise the need to travel and provide services and facilities close to where people live, then sets out a hierarchy which priorities active travel (walking and wheeling), public transport and shared mobility (for example car clubs and cycle hire) over traditional highway improvements for private car use. This will mean that in future, travelling by sustainable modes should be more attractive than travelling by car.
- 9.7 The focus on travel and health is shown through Exeter's inclusion in a Sport England Delivery Pilot. The public face of this project is Live and Move, which is working with communities to improve health and wellbeing through small changes to people's everyday lives and promoting more active lifestyles.
- 9.8 All these strands come together and aim to achieve a goal of 50% of trips within the city being taken by active travel. This is a shared ambition with Devon County Council.
- 9.9 On a more strategic level, we also need to recognise the important role which Exeter plays as a gateway to the national transport network with the two mainline railways lines, trunk road network, bus and coach station and links to Exeter Airport in East Devon. Investments in these important networks will be required to maintain the role of the city as a regional hub. Thinking about the impact of aviation in terms of achieving net zero will be a significant challenge but will need to be recognised and addressed in the period up to 2041.

STC1: Sustainable movement (Strategic policy)

To help achieve a net zero city by 2030, to support the sustainable growth of Exeter and the wider area and to improve accessibility, health and the environmental quality of the city, the following outcomes will be sought from all relevant planning decisions and through joint working between the City Council, other authorities and stakeholders:

a. Delivering on the spatial strategy by supporting development in locations which minimise the need to travel;

- Supporting the transport hierarchy by maximising walking, cycling, wheeling and public transport for the majority of everyday journeys and enabling low-car development where appropriate;
- c. Providing for mixed use development which enables communities to access most of their daily needs on foot, or alternative inclusive mode, from their home;
- d. Supporting a healthy, active city through the transport hierarchy by delivering a prioritised and integrated network of active, inclusive travel links to provide coherent, direct, safe, comfortable and attractive routes for walking, cycling, wheeling and emerging modes;
- e. Achieving a reliable, low carbon, frequent and attractive standard of public transport within the city and to key destinations elsewhere throughout the day;
- f. Enhancing choices for all through new forms of car use by expanding shared mobility and requiring its provision in, or contributions from, all major developments, supporting innovations in subscription travel services, significantly increasing provision for electric vehicles and enabling the provision of mobility hubs;
- g. Supporting opportunities for sustainable waterborne transport and protecting the function of embarkation points to waterways;
- h. Protecting and enhancing the function of Exeter as a strategic rail, bus/coach, road and air hub through investments in critical infrastructure and improvements to sustainable connections to these hubs;
- i. Maintaining the transport function of the Exeter Ship Canal; and
- j. Ensuring safe travel.

The transport hierarchy

- 9.10 Minimising the need to travel will be a vital part of creating attractive places, meeting our net zero ambitions and supporting healthy lifestyles. New development will need to be provided in a way which plays its part.
- 9.11 Policy STC2 explains how new development will need to consider transport to make it easier for people to walk, wheel or use public transport and shared mobility (e.g. by using car clubs) in sequential order.
- 9.12 Active travel and public transport provision will generally be prioritised over traditional highway improvements which provide additional road capacity. This will redress the balance between modes. In addition, transport provision will need to play a key role in placemaking.
- 9.13 There may be cases where highway improvements are required. This could include where improvements are needed to enhance highway safety and resilience, where highway improvements provide for sustainable modes and so minimise the overall number of car trips and where widened vehicle or additional access points are needed to provide direct access to a development site. There may also be cases where localised junction enhancements and improvements to the trunk road network are required because development impacts cannot be avoided even when implementing sustainable transport improvements. The safety and resilience of the trunk road network will be a key consideration.

STC2: The transport hierarchy (Strategic policy)

To help achieve a net zero city by 2030, to support the sustainable growth of Exeter and the wider area and to improve accessibility, health and the environmental quality of the city, development will be required to make high quality provision for the following in sequential order:

- a. Active travel;
- b. Public transport and shared mobility;
- c. More sustainable forms of car use and electric vehicles.

Highway enhancements will only be supported when they do not cause unacceptable harm to the local natural, built or historic environments, and:

- a. They are necessary to improve highway safety;
- b. They promote an overall reduction in car journeys;
- c. They are required to enable access to a development site; or
- d. Where severe development impacts on the transport network cannot be avoided by the active and sustainable travel investments proposed with the development.

Highway design will be expected to prioritise active and public transport.

Contributions towards additional or improved transport provision will be sought where necessary.

Active travel proposals

- 9.14 The Exeter Transport Strategy and Local Transport Plan 4 includes an ambitious aim for 50% of trips within Exeter to be made on foot or by cycle. On this basis, a series of specific schemes will be required to support walking and cycling meaning that active travel becomes a more attractive option.
- 9.15 Policy STC3 identifies a set of key proposals including the Exeter sections of long distance strategic trails. These reflect the importance of Exeter as the centre of a large travel to work area and the attractiveness of the city as a tourist destination. The Exe Estuary Trail linking Exeter with Dawlish and Exmouth, the Clyst Valley Trail between Exeter, villages to the east and Killerton and the emerging proposals for the Boniface Trail towards Crediton are important strategic links for the city. The Boniface Trail is reflected in the Devon Countywide Local Cycling And Walking Infrastructure Plan.
- 9.16 Policy STC3 also includes a list of important routes identified as priorities in the Exeter Local Cycling And Walking Infrastructure Plan. These routes should link to wider projects to improve the street scene and public spaces, serve the strategic mixed use brownfield allocations in the Plan and provide access to other key destinations such the city centre, employment areas and schools to play a key role in

providing a significant improvements to the cross-city network of pedestrian and cycle routes.

- 9.17 It is important to recognise that there are some significant barriers to walking and cycling in Exeter, which mean that routes are less direct, and journeys take longer. These barriers are roads, large junctions, the river and the canal. Improvements will be needed to overcome some of these barriers, whilst making the most of the river and canal in terms of active travel and waterborne transport. Improvements will also be made to support access to the Green Circle, which is a fantastic asset in bringing nature into the city and to the local population.
- 9.18 Beyond the large scale active travel projects identified in Policy STC3, smaller local measures are also important. The detailed design of cycle infrastructure in accordance with Government guidance LTN1/20, secure and enclosed cycle parking and drying spaces in buildings are all needed to widen the attractiveness of active travel. Travel planning will also be needed to support people in making sustainable transport choices as they move into new developments.
- 9.19 The design of developments themselves will also need to ensure that active travel is provided for comprehensively. Development should be designed at the outset to prioritise walking, cycling and wheeling and minimise driving speeds in accordance with approaches set out in the Government's Manual For Streets and the Sport England Active Design Guidance. New development will also need to provide inclusive and accessible environments that take into account the needs of the whole community, including disadvantaged groups, those with disabilities, older people and people with children and buggies. The Healthy Streets principles will play a role here and should be taken into account when designing new developments and delivering new transport infrastructure. Policy D1 covering design later in the Plan is also relevant.
- 9.20 Active travel routes should be designed to provide appropriate lighting to encourage use throughout the day including mornings and evenings and during the winter, whilst ensuring that artificial lighting is designed, located and operates to avoid adverse impacts on wildlife. Looking more broadly, it is important to ensure that streets, footways and other walking routes are free from clutter and appropriately lit to make walking a more attractive option. The City Council, alongside Devon County Council, has signed up to the Clear Streets Charter to address issues caused by advertising boards, street furniture, charging points and bins and to promote engagement with people with visual impairments in the design of developments.

STC3: Supporting active travel (Strategic policy)

The City Council will work with other authorities and stakeholders to create inclusive, coherent, direct, safe, comfortable and attractive active travel environments through placemaking, enhancements to the public realm, street planting and biodiversity enhancements, improved air quality, use of water ways and the reduced dominance of cars in accordance with active design principles.

Active travel routes linking development with key destinations and community facilities will be supported.

The City Council will support the extension of a comprehensive active travel network including through improvements to:

- a. Long distance routes including the Clyst Valley Trail, the Boniface Trail, the Exe Cycle Route and Exe Estuary Trail;
- b. Strategic routes and core walking zones included within the Exeter Local Cycling and Walking Infrastructure Plan, to railway stations and routes alongside waterways;
- c. Addressing severance challenges caused by the Strategic Road Network, the former Exeter bypass, Western Way, key junctions, railway lines, the River Exe and the Exeter Ship Canal, without compromising safety;
- d. City centre streets, including the High Street, South Street, Fore Street, Southernhay, Paris Street, Queen Street, Sidwell Street, Summerland Street and Barnfield Road;
- e. Routes to and including Heavitree High Street, Cowick Street and Magdalen Road; and
- f. Links within the city to public rights of way and other routes which provide access to the surrounding rural areas.

Development proposals will be required to provide high quality infrastructure, facilities and multi-modal parking to prioritise active travel for all.

Major development proposals must:

- a. Prioritise a dense and permeable network of coherent, direct, safe, comfortable and attractive active routes connecting into the wider active travel network;
- b. Be designed so early phases of development are as close as possible to existing active travel routes and facilitate active travel;
- c. Consider the potential to reflect and reinstate historic street patterns in the design and provision of active travel routes; and
- d. Provide secure, enclosed parking or storage which can accommodate cycles, electric bikes, cargo bikes, adapted cycles, push chairs, mobility scooters and wheelchairs.

Parking for active travel modes must be located in easily accessible locations with natural surveillance and high quality access to active travel routes and must be prioritised over car parking with the exception of disabled parking.

Development proposals of more than 0.5 hectares of employment and commercial uses, and all development proposals which would employ more than twenty people, must provide appropriate numbers of showers and suitable drying space.

Parking for active travel should be provided in accordance with the adopted Sustainable Transport Supplementary Planning Document or any subsequent replacement.

Contributions will be sought towards new or improved active travel infrastructure in the city from the early phases of development.

Public transport

- 9.21 In addition to active travel, public transport will be vital to provide a real alternative to using the car, particularly for areas on the edge of the city where there are hills and for the elderly, families and the less mobile.
- 9.22 Compared to surrounding rural areas Exeter has a wider bus network with more frequent services, whilst the new bus station in the city centre has improved the

passenger experience and vehicles have been upgraded. However, improvements to service reliability, frequencies, bus priority measures, the provision of electric vehicles and waiting infrastructure are all required to develop public transport further. Exeter is also important as a hub for long distance coach travel, with National Express, Falcon and Megabus all serving the city and wider area. This role should be safeguarded with improvements made to interchanges and stops, whilst bus services to Exeter Airport should be enhanced. The City Council will work with Devon County Council to improve bus provision through the Exeter Bus Service Improvement Plan and new development.

- 9.23 In addition to buses, Exeter benefits from an efficient and widespread rail network with two mainlines and two branch lines. There have also been considerable efforts made to improve the network in recent years, with high profile new stations provided at Newcourt and more recently at Marsh Barton. The network provides good rail access to many areas of the city, to the local area and national destinations. However, frequencies and station access require improvement and a new station at Hill Barton/Monkerton is part of the Devon Metro programme alongside an enhancement to the gateway role of St David's station. The ongoing roll out of the Devon Metro concept will continue to provide enhancements in future.
- 9.24 Policy STC4 promotes a number of public transport improvements. For buses, these include strategic bus improvements on the main corridors into the city, the provision of electric vehicles and park and ride / park and change facilities. These are included in the Exeter Bus Service Improvement Plan. Projects could include improvements to infrastructure (such as additional highway space for buses, bus priority measures, bus stops and real time passenger information), upgraded vehicles and enhancements to service frequency. For rail, the policy continues the longstanding support for another new railway station at Hill Barton/Monkerton, improving St David's station so that it provides a fitting arrival point for the city and widespread accessibility improvements to city stations. Working with partners, the City Council will support greater integration of transport modes, including bus, rail and shared mobility (such as car clubs and e-bike hire) through smart and integrated ticketing systems.
- 9.25 The spatial strategy has a key role in ensuring widespread use of public transport by focusing development close to existing services. Development must also provide the improvements needed to enhance our networks and improve transport choice. This will help us deliver on our net zero ambition, enhance health and wellbeing and improve accessibility for all communities.

STC4: Supporting public transport (Strategic policy)

The City Council will work with other authorities and stakeholders to support inclusive, direct, frequent, reliable and affordable public transport which runs throughout the day and into the evening.

The City Council will support bus and coach provision through service, infrastructure and vehicle improvements:

- a. On the Exeter Central corridor between Heavitree and the city centre:
- b. On the Exeter Northern corridor between New North Road and the city centre;
- c. On the Exeter Eastern corridor between Pinhoe Road and the city centre;
- d. On the Exeter western corridor between Cowick Street and the city centre;
- e. On Topsham Road, Alphington Road and Cowley Bridge Road;

- f. On the local and national coach network;
- g. On the park and ride network; and
- h. Serving rail interchanges and Exeter Airport.

The City Council will support the enhancement of rail provision in the city by:

- Safeguarding land for a railway station and associated enabling track and signalling infrastructure at Monkerton/Hill Barton;
- b. Supporting continued delivery of the Devon Metro programme including service frequencies of at least every thirty minutes on rail lines into Exeter and every fifteen minutes between St David's and Digby and Sowton Stations;
- c. Supporting improved interchange facilities at St David's Station;
- d. Supporting accessibility and level access at all stations, particularly at St Thomas, Polsloe Bridge and St James Park; and
- e. Supporting proposals for rail freight infrastructure.

The City Council will support multi-modal travel:

- a. By enabling park and ride and park and change provision serving the key radial routes accessing the city where appropriate;
- b. Through the promotion of high quality, multi-modal provision at a series of mobility hubs at key interchanges, in the city centre and at large scale developments to enable a seamless transition between modes; and
- Through collaboration with partners on an integrated ticketing system for public transport and shared mobility.

Development proposals will be required to provide high quality and safe access to public transport.

Major development must:

a. Provide densities, layouts and design which allow the provision of prioritised, frequent, reliable and attractive public transport services to, and where relevant, within, the site.

Large scale development proposals of one hundred homes or more and major commercial development must:

- a. Be located where high quality public transport is or can be provided through developer contributions;
- b. Deliver appropriately located bus stops with raised kerbs for inclusive bus access, high quality shelters and real time information and, where appropriate, suitable routes for bus priority; and
- c. Provide new local multi-modal transport hubs and interchanges making best use of existing bus, rail and walking and cycling routes.

Contributions will be sought towards new or improved public transport services and/or infrastructure in the city, appropriately phased to provide high quality travel options early in the development balanced with efficiently supporting the long term future of the service.

Supporting more sustainable forms of car use

- 9.26 Whilst active travel and public transport will be prioritised and will play a vital role in helping to support development, achieving net zero, increasing health and wellbeing and creating great places, new forms of car use will retain a role for some people and for some journeys. Policy STC5 explains how new and more sustainable forms of car use will be supported.
- 9.27 The Government has committed to the end of sales of new petrol and diesel cars by 2035, meaning the number and importance of electric vehicles will significantly increase over time. Alongside the decarbonisation of the electricity grid, this evolution will reduce carbon emissions, improve air quality and reduce the impact of car use in terms of noise. The provision of significant additional numbers of electric charging points and associated parking will therefore need to come forward quickly, including in new development. This will need to take place in accordance with Part S of the Building Regulations. This should be complemented by appropriate provision for loading and unloading of deliveries as required to support the growth and evolution of online shopping.
- 9.28 Car use will also be part of an increase in shared mobility, where transport is shared among users who pay to have access to transport on a flexible basis. This could include car clubs and car sharing schemes or be combined with other systems such as bike hire. Car clubs can be used for less frequent trips and to complement sustainable transport. Development will support such car use by providing the necessary infrastructure and parking provision for shared mobility.
- 9.29 The spatial strategy within the Exeter Plan, which focuses on strategic mixed use brownfield sites close to the city centre, the provision of local services close to where people live and increased support for sustainable travel means that low-car, and in some cases, no-car development will be supported where appropriate, particularly at the strategic mixed use brownfield allocations. Planning applications at these sites will need to address this potential and also consider the possible parking implications for the nearby streets through controlled parking regimes. Elsewhere, parking will need to be provided in accordance with the Sustainable Transport Supplementary Planning Document which provides indicative requirements.

STC5: Supporting more sustainable forms of car use

To manage the impact of car travel, development will be required to make specific provision for more sustainable forms of car use including for electric vehicles and shared mobility.

Parking for electric vehicles with private and publicly accessible electric charging points will be required by development in accordance with the current Buildings Regulations of the time. Parking for car club vehicles must be provided at accessible locations in all major developments. Parking for electric vehicles and car club vehicles should be prioritised over parking for privately owned petrol and diesel cars in terms of the amount and location and should allow for the growth in the use of these vehicles.

Electric charging points should not be located where they would have a negative impact on the safety and functionality of the highway including footways, residential amenity or heritage assets and their setting. Specific provision must be made in major developments for loading, unloading and deliveries.

Car parking should be successfully integrated into the overall design of proposals by adopting suitable layouts that avoid vehicle dominated frontages, creating well designed street scenes and ensuring a high quality public realm that prioritises active travel.

Levels of car parking should be provided in accordance with the indicative standards in the adopted Sustainable Transport Supplementary Planning Document and any subsequent replacement. Levels of car parking and motorcycle parking should take account of:

- a. The uses proposed;
- b. The location of development;
- c. The scale of development; and
- d. Availability of, and/or potential to improve, active travel, public transport and shared mobility.

Car-free and low-car residential (including purpose built student accommodation and coliving), employment and commercial development will be supported in the city centre, at the strategic mixed use brownfield allocations and elsewhere when it is demonstrated to be acceptable by a Transport Statement/Transport Assessment and Travel Plan, where appropriate provision is made for high quality active travel, public transport and shared mobility and where there are currently, or are proposals for, controlled parking zones.

Contributions towards the establishment of controlled parking zones will be required from major development proposals with car-free and low-car schemes where they are not already in place.

Travel Plans

- 9.30 Travel Plans are long term management strategies for integrating proposals for sustainable travel into the planning process and new developments. People's travel behaviours can be influenced by facilities at their place of work and home, particularly when they move house. The provision of information, opportunities and incentives to use active travel, public transport and shared mobility, provided through a Travel Plan, can deliver significant increases in the use of these modes for comparatively low cost. Policy STC6 sets out the requirements in relation to Travel Plans.
- 9.31 Travel Plans will usually be required at outline planning application stage through a planning condition and will be supported by developer contributions.

STC6: Travel Plans

All development proposals which generate significant transport impacts should be accompanied by a Travel Plan. The scope of the Travel Plan should be proportionate to the transport impact of the proposed development.

Travel Plans will identify how the development will minimise car travel through:

a. Development layout and the location of nearby facilities and services;

- b. Infrastructure and facilities to support sustainable transport;
- c. Multi-modal parking;
- d. The provision of travel information;
- e. Measures to incentivise the use of sustainable transport; and
- f. Phasing, monitoring, reviewing and reporting of the Travel Plan measures.

Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions.

Safeguarding transport infrastructure

- 9.32 The NPPF states that planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and support large development. On this basis, Policy STC7 identifies land and structures which are needed to either facilitate sustainable transport or support the large development allocations in the Plan.
- 9.33 The delivery of the schemes which are listed in Policy STC7 will require significant partnership working between a number of organisations including the City Council, Devon County Council and Network Rail. The planning process will support these projects.

STC7: Safeguarding transport infrastructure (Strategic policy)

The following sites, routes and structures are safeguarded for retained, or future, transport infrastructure:

- a. Land at Monkerton/Hill Barton on the Exeter to Exmouth branch line for a new railway station and associated access and uses;
- b. Land to the west of the Great West Mainline, north of Exeter St David's Station, for rail freight infrastructure and associated access;
- c. An emergency access and egress route crossing the Exeter Ship canal and River Exe from the Water Lane allocation;
- d. Railway arches and land at Tan Lane under the Great Western Mainline for access to the Water Lane allocation;
- e. Underbridge of the Great Western Mainline for active travel access to Water Lane and Marsh Barton;
- f. A railway arch under the Great Western Mainline on Alphington Road for improved pedestrian and cycle access;
- g. The embankment under the Exmouth Branchline on Sidmouth Road for improved pedestrian and cycle access; and
- h. The Exeter Ship Canal.

Land will also be required at Water Lane and in the Riverside Valley Park for an additional active travel crossing of the Exeter Ship Canal.

Development will not be supported where it would preclude the delivery of the transport infrastructure on the sites, routes and structures listed in this policy.

Motorway service area

- 9.34 The service area off Junction 30 of the M5 close to Sowton Industrial Estate is strategic infrastructure for the wider area and is important in supporting the function of the strategic road network. In recent times the services have been improved, including through the opening of a large scale electric charging station.
- 9.35 However, the service area does not have dedicated slip roads from the motorway which means that vehicles have to navigate the local highway network for access. This plays a role in increasing congestion on the local highway network, particularly in the summer months as a result of holiday traffic. This has implications for trips from Exeter's large travel to work area, providing access to Sowton as a strategic employment area and can cause congestion backing into the city.
- 9.36 If an alternative service area could be provided close to Exeter this would provide relief for the local highway network, providing significant benefits. As set out in Policy STC8, the City Council would support the provision of an alternative service area close to the city if a site could be delivered. This would require significant discussion and partnership work with Moto who run the services, Devon County Council, National Highways, East Devon District Council, Teignbridge District Council and Mid Devon District Council, whilst funding and securing the land needed would be significant challenges.
- 9.37 The motorway services are not allocated for development however the site would be appropriate in principle for employment provision and therefore if an alternative motorway service area could be delivered the City Council would support employment development at the site of the current services.

STC8: Motorway service area (Strategic policy)

Subject to the provision of an appropriate replacement, the City Council supports the principle of redeveloping the motorway service area adjacent to Junction 30 on the M5, for employment uses. This would require collaboration between National Highways, Devon County Council and neighbouring local planning authorities.

Digital communications

- 9.38 Digital communications go hand in hand with transport provision; people increasingly access services, shopping and work online, reducing the need to travel. The Covid-19 pandemic accelerated this evolution which means that fast and reliable digital communications infrastructure is increasingly vital to support our communities and businesses.
- 9.39 The importance of a new approach to digital infrastructure provision is articulated through the United Kingdom's Digital Strategy. This is taken forward at a city level by Policy STC9 which sets out a number of requirements for new development in order to drive better digital communications. Digital infrastructure will need to be planned into new developments from the start and viewed as an essential utility to ensure high quality, comprehensive connections. Open-access ducting will be provided to enable a variety of fibre companies to provide the high quality digital connectivity which communities need. The City Council will work with digital providers to deliver

- on these aims and will be informed by the Greater Exeter Digital Connectivity Strategy
- 9.40 In making improvements to digital connectivity, it will be important to ensure that enhanced digital infrastructure is planned in a way which considers amenity and potential impacts on the natural and historic environments.

STC9: Digital communications (Strategic policy)

To facilitate economic growth, achieve a net zero city by 2030 and improve accessibility for all, the City Council is committed to enabling a step-change in digital communications.

Development and infrastructure proposals that support the improvement of digital communications, including full fibre connectivity, digital exchanges and next generation mobile connectivity, will be supported when they would not have unacceptable impacts on the natural, built and historic environments.

All new residential, employment and commercial development will:

- a. Be required to have access to high speed digital infrastructure; and
- b. Incorporate digital infrastructure as one of the essential utilities.

All major development will:

- Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities and identified within a utility connection plan;
- b. Where an appropriate organisation for its management is in place, provide a network of open access ducting (open to all fibre providers) suitable for, and including, full fibre connections to each building on first occupation. Ducting must have capacity to accommodate multi-operator fibre connections to the premises to encourage competition and choice for consumers; and
- c. Where appropriate management structures are in place, provide digital infrastructure ducting through a 'dig once' approach.

Development proposals of five hundred homes or more or five hectares of employment land or more will ensure resilience by providing at least two physically separate external connections points.



Vision – A liveable and connected city

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of being a liveable and connected city. Protecting and enhancing the hills surrounding the city and the Valley Parks and delivering green infrastructure will help to provide high quality neighbourhoods and create inclusive communities.

Vision – A healthy and inclusive city

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating a heathy and inclusive city. Protecting and enhancing the hills surrounding the city and the Valley Parks and delivering green infrastructure and biodiversity enhancements across the city will help create a healthier and more inclusive city.

Vision - The most active city in the United Kingdom

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating the most active city in the United Kingdom. Protecting and enhancing the hills surrounding the city and the Valley Parks and improving access to natural green spaces including the Green Circle will help create the most active city in the United Kingdom.

Vision - A city of culture

Addressing the need to protect and enhance the natural environment links to the aim in the 2040 vision of creating a city of culture where the environment plays a leading role. Protecting and enhancing the hills surrounding the city and the Valley Parks will ensure Exeter retains its cultural identity and will help build a city where everyone thrives.

Objective: Protect and enhance the city's unique natural setting provided by the hills, the Valley Parks and River Exe, and improve, extend and connect natural green spaces and deliver net gains for biodiversity.

Introduction

- 10.1 The city has a high quality natural environment, with Valley Parks and city parks, water bodies including the River Exe and the Exeter Ship Canal and many public rights of way. The hills surrounding the city give Exeter a distinctive character and cultural identity, whilst the city contains a rich variety of wildlife habitats.
- 10.2 The natural environment benefits from a significant, protective legal framework including the Environmental Act 2021, that helps set the context for protecting and enhancing Exeter's existing environmental assets and creating new assets and networks. The Exeter Plan seeks to manage development pressures on our local environment to provide benefits for landscape and wildlife, deliver nature recovery, whilst helping us to combat climate change and provide a high quality environment for people to enjoy.
- 10.3 All designations, protected areas and sites mentioned in the policies below are shown on the Policies Map.

Landscape setting

- 10.4 The planning system should enhance the natural and local environments by protecting and enhancing valued landscapes. The hills surrounding the city and the connected ridgelines give Exeter a distinctive character and cultural identity. The Valley Parks also contribute significantly to the city's landscape setting.
- 10.5 The Exeter Plan is supported by the Exeter Landscape Sensitivity Assessment which appraises open countryside within and around Exeter, including the Valley Parks. The appraisal demonstrates that much of the land around Exeter is of intrinsic landscape value. It contains high quality agricultural land and areas of nature conservation importance. The open land also performs a variety of other roles, including maintaining identity, providing a green rural backdrop for key heritage assets, enabling informal recreation and providing tranquil areas. Access to countryside and connections with the natural environment are widely recognised as contributing to both physical and mental health.
- 10.6 Overall, this land provides the landscape setting for the city and for surrounding areas. It is the combination of these roles, qualities and their importance to the local population which establishes this land as a distinctive and valued landscape requiring protection from inappropriate development.
- 10.7 Policy NE1 provides protection to the landscape setting areas of the city. These areas include the sensitive areas to the north and west of the city and the Valley Parks. However, landscape is a strategic issue and our neighbouring authorities are also encouraged to recognise and protect Exeter's landscape setting. The Green Infrastructure Strategy clearly identifies the spatial framework for Exeter and surrounding area (see Appendix A).
- Not all development within the landscape setting areas will be inappropriate. Development that is reasonably necessary for the purposes of agriculture, forestry, the rural economy, informal outdoor recreation, providing green infrastructure, landscape, education, biodiversity enhancement, delivering climate resilience, or achieving net zero may be appropriate if it minimises harm. Essential strategic infrastructure, such as energy or transport infrastructure necessary to deliver allocated development within the Exeter Plan, may also be appropriate if it can be demonstrated that there is no suitable alternative site with less harmful impacts and that harm is minimised.
- 10.9 Development within Exeter's landscape setting areas will be assessed against a series of criteria, including the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development, as identified in the Exeter Landscape Sensitivity Assessment. Development should:
 - Protect and conserve the strategic landscape setting of, and backcloth to, the city, and where possible enhance it;
 - Avoid prominent ridges and slopes and, in particular, steeper slopes;
 - Protect, conserve and enhance the existing treed and open undeveloped skylines;
 - Avoid breaching skylines with development form, keeping roof lines well below skylines formed by vegetation or landform;

- Conserve and enhance the river valley corridors, their floodplains and their settings, including the Exe and the Clyst;
- Protect important views to and from the hills surrounding Exeter;
- Protect the landscape's rural character in close proximity to urban areas by resisting piecemeal urban expansion which undermine landscape patterns and sense of place;
- Protect the character of rural lanes, minimising road widening and signage in association with new development;
- Protect and appropriately manage nationally important historic / archaeological sites and provide interpretation where appropriate; and
- Plan for a network of green spaces and green infrastructure links to support the current and future population of Exeter, whilst integrating new development into the landscape.

NE1: Landscape setting areas (Strategic policy)

Exeter's distinctive and valued landscape setting will be protected and enhanced. Development proposals within the Landscape Setting Areas will only be permitted where it can be demonstrated that:

- a. There is no harm to the undeveloped character, natural beauty or quality of views enjoyed by people within the city; and
- b. There is no harm to the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development, as identified in the Exeter Landscape Sensitivity Assessment;

or,

- c. They minimise harm to the Landscape Setting Area and are reasonably necessary for the purposes of:
- Agriculture;
- Forestry;
- The rural economy;
- Outdoor recreation;
- Providing green infrastructure;
- Landscape, education or biodiversity enhancement;
- · Managing flood risk and delivering other forms of climate resilience; or
- Achieving net zero.

or,

d. They deliver essential strategic infrastructure and it can be demonstrated that there is no suitable alternative site with less harmful impacts and they minimise harm to the Landscape Setting Area.

Valley Parks

10.10 Exeter has ten Valley Parks (including three new Valley Parks proposed in the Exeter Plan) which provide opportunities for informal recreation alongside areas of

tranquillity, whilst allowing the public access to nature with all the benefits that affords. The Valley Parks are also of significant wildlife value and can contribute to delivering the Devon Local Natural Recovery Strategy. The Exeter Valley Parks are:

- Ludwell Valley Park: This attractive area of undulating farmland is located between Wonford and Rydon Lane and is an island of countryside surrounded by residential and office development. There are fine views from here across the city and down the Exe Estuary. There are pedestrian access points on all sides of the park;
- Riverside Valley Park: Stretching from Cowley Bridge to Topsham, this is the
 largest of the Valley Parks. The landscape character and wildlife value of the
 Park alters significantly along its length, from grazing meadows in the north,
 through the busy Quay/Canal Basin area and then southwards to become part of
 the Exe Estuary Site of Special Scientific Interest. It is a popular, informal
 recreational area that is accessible from many parts of Exeter and it forms a
 continuous wildlife corridor through the city;
- Mincinglake Valley Park: This finger of countryside extends down from Stoke Hill between the residential areas of Mincinglake Road and Mile Lane. The lower valley is wooded whilst the upper part comprises meadows that are rich in wild flowers, butterflies and other insects. The park has a system of well laid out paths and there is easy access from adjacent residential areas;
- Alphington/Whitestone Valley Park: This western ridgeline of the city comprises some splendid rural valleys and ridgelines that offer excellent views of the city, although access is restricted to footpaths, bridleways and lanes. Within the park is the Barley Valley Local Nature Reserve;
- Duryard Valley Park: A Valley Park to the north of the city. The mix of meadows and woodland here are host to a wide range of wildlife that thrives in the quiet valleys. All the roads within the estate are private, but responsible walkers are not prevented from using them. The picnic site off Pennsylvania Road affords fine views across the Valley Park towards Dartmoor. Within the park is the Belvidere Meadows Local Nature Reserve;
- Hoopern Valley Park: This is the only area of natural open space in the St David's/St James areas of Exeter. It comprises a steeply sided and partly wooded valley that is close to densely populated urban areas and the University of Exeter. It forms an important wildlife refuge and supports, amongst other species, deer, badgers, grass snakes, butterflies and a wide range of birds. There is scope for significant improvement to the habitats found there. Public access is currently limited to the public footpaths that run alongside and across the valley;
- Savoy Hill: A relatively small Valley Park to the north of the city close to Beacon Heath, soon to be extended and provided with enhanced unrestricted access. The northern portion comprises a large meadow rich in wild flowers and the southern section is a partially wooded, narrow valley. The park is surprisingly rich in wildlife and the proximity of a large residential area makes the locality particularly valuable for informal recreation;
- Whitycombe Valley Park: A newly designated Valley Park in the Exeter Plan, located on the northern edge of Exwick. The sites includes some pristine

meadow and provides views across the city. Whilst small in size, the proximity of a large residential area makes this area particularly well used for informal recreation:

- Northbrook Valley Park: A newly designated Valley Park in the Exeter Plan. This
 former golf course creates a link between the two existing Valley Parks of
 Ludwell and Riverside and there is significant scope here for making
 improvements, for example through the Northbrook wild arboretum project.
 Designating this area as a Valley Park ensures it is retained for the city's
 residents to use for informal recreation; and
- Clyst Valley Park: A newly designated Valley Park that sits on the built-up edge
 of Topsham, providing an important buffer. The land comprises the flat open
 valley floor of the Clyst with its semi-natural marshy character, the scenic valley
 sides and the land forming the skyline above the valley. There is potential for this
 land to link into the wider Clyst Valley Regional Park to the north (within East
 Devon) to deliver a strategic scale resource for residents of Exeter and East
 Devon.
- 10.11 Whilst not all Valley Parks are strictly speaking valleys, and many of the areas within the Valley Parks are not in public ownership, nevertheless they all provide opportunities for informal recreation, areas of tranquillity and access to nature and are important areas for wildlife. Many of the Valley Parks (Ludwell, Riverside, Mincinglake, Whitycombe, parts of Duryard and parts of Alphington/Whitestone) are looked after and managed by the Devon Wildlife Trust. The Riverside and Ludwell Valley Parks Masterplan sets out where new areas of public recreational space can be created and where improvements to existing space can be made.
- 10.12 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.
- 10.13 Not all development within the Valley Parks will be inappropriate. For example, there may be opportunities for land management interventions within the Valley Parks, particularly in the upper parts of catchments, that could help mitigate flood risk and help with climate resilience. Other development proposals will enhance the Valley Parks directly and bring even greater benefits to those that live and work in Exeter.
- 10.14 Policy NE2 seeks to protect the Valley Parks and only permit appropriate development that does not harm the key purposes for which the Valley Parks are designated (i.e. provision of opportunities for informal recreation, areas of tranquillity and access to nature). It should be noted that many of the Valley Parks include heritage assets and therefore proposals for development will also need to have reference to policies in chapter 11.

NE2: Valley Parks (Strategic policy)

Development proposals will only be permitted within the Valley Parks where they deliver a meaningful contribution to at least one of the following:

- a. Informal outdoor recreation;
- b. Suitable Alternative Natural Greenspace;
- c. Nature conservation and ecological enhancement;
- d. Enhancements to active travel:

- e. Environmental education;
- f. Managing flood risk and other forms of climate resilience; or
- g. Achieving net zero,

and where the development proposals do not result in unacceptable harm to the key purposes for which the Valley Parks are designated.

Development proposals which are contrary to the Riverside And Ludwell Valley Parks Masterplan, or which would harm existing or potential opportunities for the above functions, will not be permitted.

Biodiversity

- 10.15 Exeter is rich in biodiversity. Internationally, nationally, regionally and locally important nature conservation sites in the city support a wide variety of wildlife, including a number of priority species. The protection of these sites is essential and is clearly linked to the city's attraction, cultural identity, sense of place, economy, tourism and general environmental quality. However, biodiversity has declined, reflected in the City Council's declaration of an ecological emergency. To reverse the decline we need to enhance and restore biodiversity across the whole city.
- 10.16 Proposals that have a likely significant effect on internationally important sites (currently comprising Special Areas Of Conservation, Special Protection Areas (SPA) and Ramsar sites) will be subject to an appropriate assessment in accordance with the Habitats Regulations. Where the assessment indicates that it is not possible to ascertain that the proposal, either on its own or in combination with other plans or projects, would have no adverse effect on the integrity of the site, development will only be permitted in exceptional circumstances where there are no alternative solutions, there is an imperative overriding public interest and compensation measures are secured.
- 10.17 Considerable work has been done to avoid any impacts on the Exe Estuary SPA and other nearby internationally important sites from increased recreational disturbance due to new residential development. A habitats mitigation strategy has been agreed working alongside East Devon and Teignbridge District Councils and Natural England. This strategy includes management of recreation on the Exe Estuary, Dawlish Warren and the Pebblebed Heaths and will deliver off-site infrastructure including Suitable Alternative Natural Greenspace (SANG) and local projects. These measures will be funded by development. The strategy covers the period 2025 to 2030 and will be updated on a rolling basis every five years, providing the opportunity to check the mitigation and, scale of growth and update any costs. The strategy lists potential SANG and local projects to be delivered in Exeter.
- 10.18 Other areas of particular biodiversity and geodiversity importance include Sites Of Special Scientific Interest (SSSIs), County Wildlife Sites and Regionally Important Geological Sites (RIGS).
- 10.19 It is also important to protect and enhance the natural environment which is not designated, including sites of local biodiversity importance and priority habitats. Ecological survey work may be required to establish the potential impact of development on biodiversity.

- 10.20 Under the 2021 Environment Act there is a requirement to produce a Devon Local Nature Recovery Strategy (LNRS). Devon County Council is leading on this work which will set out the priorities and actions required to achieve the Devon Nature Recovery Network. It will also include a Devon Recovery Map which will show existing habitats and highlight opportunities and priorities. Work on the LNRS started in 2022 and it is expected to be published in 2025.
- 10.21 All development proposals will need to provide at least 10% measurable net gains in biodiversity, onsite where possible but elsewhere if not, in line with the biodiversity mitigation hierarchy (which puts avoiding harm to biodiversity ahead of mitigating harm, with compensation as a last resort). The Biodiversity Net Gain (BNG) requirement is set out in the 2021 Environment Act and is now a legal requirement. The Department for Environment, Food and Rural Affair's metric tool must be used for BNG calculations. Small development (that meets the criteria) may choose to use a simpler version of the tool called the small sites metric. The LNRS will help direct BNG interventions to the places that will help maximise delivery of bigger, better and more joined up nature recovery networks.
- 10.22 Policy NE3 provides criteria to ensure all proposals follow the mitigation hierarchy and provide a net gain in biodiversity. With regards to delivering other biodiversity improvements on site, the Residential Design Guide Supplementary Planning Document provides helpful guidance, including for example, in relation to bat and bird box provision.

NE3: Biodiversity (Strategic policy)

The City Council is committed to increasing biodiversity to reverse the decline in nature, help achieve net zero, improve the local environment, encourage cultural exchange and enhance health and wellbeing. In order to achieve this, development proposals will be required to protect, enhance, connect and restore biodiversity and follow the mitigation hierarchy (which puts avoiding harm to biodiversity ahead of mitigating harm, with compensation as a last resort).

Where it is not certain that a development proposal would have no adverse effects on the integrity of a site on the United Kingdom National Site Network (Special Protection Area or Special Area of Conservation) or internationally important site (Ramsar), development will not normally be permitted.

Where development proposals are likely to have either a direct or indirect adverse effect on a Site of Special Scientific Interest or on Irreplaceable Habitats (such as Ancient Woodland or Veteran Trees) they 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 sites.

Development proposals that are likely to have either a direct or indirect adverse impact on other known sites of biodiversity interest (including Local Nature Reserves, County Wildlife Sites, Devon Wildlife Trust Reserves, sites identified as important in the Local Nature Recovery Strategy or a Regionally Important Geological Site) will only be permitted if:

a. The need for, and benefits of, the development are sufficient to outweigh biodiversity and/or geological conservation considerations;

- b. It can be demonstrated that there is no suitable alternative site with less harmful impacts; and
- c. Damaging impacts are avoided and appropriate mitigation and compensatory measures are implemented where avoidance is not possible.

All development proposals, where relevant, will be required to:

- a. Preserve, restore and create wildlife habitats, corridors and networks and any other features of ecological interest including those related to protected and priority species in accordance with the Local Nature Recovery Strategy;
- b. Contribute towards measures to mitigate against adverse effects from recreational disturbance on the Exe Estuary Special Protection Area and other nearby sites on the United Kingdom National Site Network;
- c. Provide at least 10% Biodiversity Net Gain on site where possible, but elsewhere if not, in accordance with national and local guidance, to meet the Biodiversity Gain Objective, help deliver the Local Nature Recovery Strategy and to ensure a net biodiversity gain for the city; and
- d. Incorporate other features to buildings, gardens and open spaces to encourage biodiversity improvements.

Green infrastructure

- 10.23 Delivering the Exeter Vision 2040 is dependent on fully using the benefits of green infrastructure including improvements to health and wellbeing, air quality, nature recovery and delivering net zero ambitions, as well as adapting to climate change by providing urban cooling and mitigating flood risk. Green infrastructure also allows for cultural and creative exchanges, whilst socialising opportunities help to bring communities together.
- 10.24 A Green Infrastructure Strategy has been in place for a number of years for the Exeter area. This will sit alongside the emerging Devon Local Nature Recovery Strategy. The Green Infrastructure Strategy 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 the surrounding area. Outside the city boundary, residents also enjoy access to other strategic areas of green infrastructure including Haldon Forest, Poltimore House and the Killerton Estate, which forms part of the wider Clyst Valley Regional Park.
- 10.25 An updated Biodiversity Network Diagram presents the Strategy's biodiversity networks, including crucial habitat links and habitat reservoirs, and allows these assets to be explored further using City Council interactive mapping.
- 10.26 The Green Infrastructure Strategy provides guidance on specific projects as well as frameworks for the strategic growth areas which are reflected in the Strategy's existing masterplans. Additional guidance and masterplans for the strategic mixed use brownfield sites will adhere to the existing Strategy and identify specific projects to contribute to delivery of the Strategy.

- 10.27 All development should protect existing green infrastructure and take opportunities to extend the sustainable transport network and enhance the biodiversity network to provide steppingstones for wildlife. All large scale developments will need to submit a Green Infrastructure Plan to demonstrate how the development will contribute to the delivery of the Green Infrastructure Strategy and to demonstrate that all residents and employees, including those with disabilities, will have easy and sustainable access to green infrastructure by walking, wheeling and cycling. Where necessary, contributions will be sought to enhance and manage green infrastructure.
- 10.28 Policy NE4 seeks to ensure that development takes a positive approach to protection, enhancement and delivery of green infrastructure.

NE4: Green infrastructure (Strategic policy)

All development proposals will be required to protect existing and take opportunities to deliver new green infrastructure in accordance with the Green Infrastructure Strategy and updated Biodiversity Network diagram.

All large scale development proposals must also be accompanied by a Green Infrastructure Plan setting out how the development will link to existing green infrastructure (including public rights of way, Valley Parks and the Exeter Green Circle) and demonstrating how the development will contribute to the delivery of the Green Infrastructure Strategy. Where necessary, contributions to enhance green infrastructure, sustainable transport links and gateway access points will be required.

Green circle

- 10.29 The Exeter Green Circle is a nineteen kilometre (twelve mile) route that provides a great walking experience within the boundaries of Exeter, from green countryside Valley Parks to the pavements of quiet leafy suburbs. This important green infrastructure asset provides access to nature-rich beautiful places and encourages active and healthy lives. Monitoring the use of the Green Circle has proven its importance as a sustainable movement route that serves to connect communities, provides socialising opportunities and allows for cultural exchange. It is therefore important that development protects this important city asset.
- 10.30 Policy NE5 seeks to protect the Green Circle and restrict development that adversely affects its functions.

NE5: Green circle

The Green Circle will be protected as an important green infrastructure asset that links communities in a sustainable way whilst providing exercise, recreation and health benefits. Development proposals which adversely affect the function of the Green Circle, or its setting, will not be permitted.

Urban greening factor

10.31 The Exeter Plan proposes a significant amount of development on brownfield land. This increased densification of the city will be likely to put increased pressure on

green spaces and natural systems that make a fundamental contribution to the identity and liveability of places. The impact of climate change and the need to increase the resilience of urban areas will only place greater demands on these ecosystem services that manage surface water, improve air quality and cool peak summer temperatures.

- 10.32 In response to this, Policy NE6 introduces a requirement for all major development to improve the provision of green infrastructure and increase the level of greening in urban environments.
- 10.33 The Urban Greening Factor (UGF) forms one of the five headline green infrastructure standards introduced in 2023 by Natural England as part of their Green Infrastructure Framework. It is a way of measuring the greenery proposed within planning applications for housing and employment, and encompasses all forms of vegetation, including trees, parks, gardens and roofs.
- 10.34 Greening the urban environment will provide significant benefits to Exeter and its residents, such as improved air quality, reduced heat island effect and enhanced biodiversity. It will also be used alongside Biodiversity Net Gain to help set the quantity and functionality of green infrastructure that should be delivered onsite.
- 10.35 Natural England's spreadsheet and user guide must be used for undertaking the Urban Greening Factor Assessment. The Assessment will be based on the red line boundary of a planning application, although this area could be reduced if large areas of retained vegetation have been included on the edge of the site.
- 10.36 For particularly constrained brownfield sites, where the applicant can demonstrate that a significant urban greening uplift has been achieved but the target UGF score is unachievable, a lower score may be considered appropriate. Applicants for planning permission must provide evidence of constraints, uplift achieved and justification for the lower score. The City Council will review these proposals on a case by -case basis.
- 10.37 The UGF Assessment should be submitted as part of the planning application along with a Landscape and Ecological Management Plan to demonstrate that the urban greening will be successfully retained throughout the life of the development. A planning condition or Section 106 Agreement will be used to ensure that the agreed urban greening is delivered.

NE6: Urban greening factor

All major development proposals must be accompanied by an Urban Greening Factor (UGF) Assessment demonstrating how the development will achieve a UGF score of at least:

- a. 0.3 for predominantly commercial development; or
- b. 0.4 for predominantly residential development (or 0.5 for predominantly greenfield residential development),

unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.

All major development proposals must also be accompanied by a Landscape And Ecological Management Plan to demonstrate that the urban greening will be successfully retained throughout the life of the development.

Urban tree canopy cover

- 10.38 Trees provide enormous multifunctional benefits to people and wildlife, helping to improve our health, providing biodiversity habitats and recreational opportunities, preventing flooding, reducing the impact of climate change (by providing shade and shelter and reducing the urban heat island effect) and improving air and water quality.
- 10.39 A 2018 assessment of the canopy cover of the city by UrbanTreeCoverOrg identified an estimated cover of 24.5%, which is higher than the United Kingdom's national average (17%) for towns and cities. The City Council has set a local target to increase this to 30% over the next twenty years. Alongside planting trees on land it owns, the City Council can also play an active role in meeting this target through planning policy.
- 10.40 Policy NE7 seeks to ensure that new developments contribute towards meeting this target. Minor applications must demonstrate no loss of green canopy cover and major applications need to be accompanied by a Canopy Cover Assessment, measuring the existing level of tree canopy cover onsite and setting out what uplift will be achieved, based on the number of new trees planted once they reach maturity. Existing trees should be retained where possible and the felling of existing healthy trees will need to be justified. Development proposals that result in an overall loss of tree canopy cover will not be permitted.
- 10.41 There may be circumstances, for example related to design, impact on heritage assets, or viability, where it may not be possible to deliver the trees on-site. In these instances, off-site provision of the additional trees will be acceptable.
- 10.42 The Devon Local Nature Partnership have published the Right Place Right Tree guidance, which should be used when choosing the locations and species of new trees to be incorporated into schemes. Reference should also be made to the emerging Devon Tree And Woodland Strategy which will set out a number of key principles which developers will be encouraged to apply.

NE7: Urban tree canopy cover

All new development proposals must contribute to achieving the City Council's ambition to increase tree canopy cover.

All major development proposals must be accompanied by a Canopy Cover Assessment measuring the existing level of tree canopy cover onsite and setting out what increase will be achieved. Development proposals that result in an overall loss of tree canopy cover will not be permitted.



11. History and heritage

Vision – A liveable and connected city

Addressing the importance of heritage links to the aim in the 2040 vision of creating a liveable and connected city. Conserving and enhancing the quality and accessibility of Exeter's iconic heritage assets will play a key role in providing high quality development, enhancing the local environment and attracting tourism and investment.

Vision – City of culture

Addressing the importance of heritage links to the aim in the 2040 vision of being a city of culture. Exeter's rich heritage is fundamental to its identity and culture and contributes towards making the city a desirable place to live, work and visit.

Objective: Conserve and enhance the city's unique historic character by promoting development that complements and celebrates the city's heritage, identity and culture.

Introduction

- 11.1 Exeter's rich historic environment makes the city unique and special and continues to shape the city's culture and identity today. It improves our communities' quality of life and pride in the city and helps to support economic prosperity. New development can raise challenges for our historic environment, as does climate change, but the Exeter Plan provides an opportunity to conserve and enhance Exeter's heritage assets whilst exploring the cultural links and celebrating the contribution of heritage to the character of the city.
- 11.2 To ensure an appropriate evidence base, the Exeter Plan has been informed by a Heritage Impact Assessment (HIA). This assessment has evaluated the potential development impacts of proposed allocations on both designated and non-designated heritage assets, including their settings. The HIA has also facilitated a more comprehensive understanding of the relationship between the built heritage and the surrounding historic landscape, ensuring that any changes made contribute positively to the overall character and identity of Exeter.
- 11.3 In addition to the HIA, a Views, Density and Heights Study has been prepared. This identifies key views of heritage assets across the city and considers the potential development impact of the larger mixed use brownfield allocations on these views and assets. This work relates to the capacity assessments for key allocations in the Plan, is referenced in the relevant allocation policies and should also be used to inform development proposals across the city, particularly major development proposals. Historic England have been a partner in producing this work.

Heritage and identity

11.4 Exeter's history is rich and long and the wealth, quality and character of the city's heritage assets help make it a desirable place to live, work and visit. Heritage-led regeneration and the careful management and conservation of the historic

- environment is crucial to continuing Exeter's role as a tourist destination and cultural centre as well as ensuring the future enjoyment of the built environment.
- 11.5 An ancient settlement with the Cathedral, Roman and medieval remains at its heart, Exeter's iconic heritage depicts its character and its landscape. It is a key part of Exeter's identity and makes an essential contribution to the economy and liveability of the city. The preservation and enhancement of these historic elements contribute not only to the aesthetic and cultural richness of Exeter, but also to its economy and liveability. The overarching need and desire to respect, conserve, enhance and celebrate Exeter's past is crucial to its future.
- 11.6 The National Planning Policy Framework (NPPF) explains that heritage interest may be archaeological, architectural, artistic or historic. This wide definition provides the context for how the Exeter Plan considers the historic environment. Additionally, heritage assets extend to historic landscapes such as the Valley Parks and historic Parks and Gardens which contribute to the city's green infrastructure and recreational spaces. Recognising these connections enhances community wellbeing and engagement with the historic environment.

Types of heritage asset

- 11.7 All heritage assets are finite resources that cannot be replaced. Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and gardens are designated heritage assets. Designated heritage assets are protected by law under the Planning (Listed Building & Conservation Areas) Act 1990, the Levelling Up and Regeneration Act (LURA) 2023 and Government policy in the NPPF.
- 11.8 There are also non-designated heritage assets that are identified locally. These include buried remains, buildings, monuments, specific sites, areas or landscapes identified as having a degree of heritage significance meriting consideration in planning decisions. These are identified in Exeter's List of Buildings of Local Importance (sometimes referred to as the local list), Conservation Area Appraisals and Management Plans and the Exeter City Historic Environment Record (HER). Non-designated heritage assets may also be identified as part of the planning application decision-making process, for example, following archaeological investigations. The List of Buildings of Local Importance is available online.
- Listed Buildings are designated by Historic England using nationally set criteria. They contribute to the character, identity, urban fabric and attractiveness of Exeter and range from buildings such as Exeter Cathedral which is grade I listed to a range of grade II* and grade II Listed Buildings. Development proposals should conserve, and where possible enhance, Listed Buildings with reference to what is significant about them, including their special architectural or historic interest, their settings and any special features they possess, both internally and/or externally. Any alterations or extensions to a Listed Building that would affect its significance, character or appearance, or proposals which would demolish all or part of a Listed Building, require Listed Building Consent from the local planning authority. This is separate to planning permission and may be required in cases when planning permission is not. Carrying out unauthorised works to a listed building without first obtaining consent from the local planning authority is a criminal offence.
- 11.10 Conservation Areas are designated heritage assets and have architectural and/or historic interest to be conserved and enhanced. Development must seek to manage

change in a way that ensures the distinct character and appearance of the conservation area, as identified in the City Council's Conservation Area Appraisals and Management Plans, is retained. The City Council has designated large parts of Exeter within a series of twenty Conservation Area Appraisals and Management Plans.

- 11.11 Registered Park and Gardens are nationally registered. The character and appearance of these assets must be conserved, enhanced where possible and sensitively managed. Their significance is a planning consideration when determining applications.
- 11.12 Exeter contains a rich legacy of above and below ground archaeological remains and these contribute to the cultural, tourist and economic attraction of the city. There are several nationally important archaeological sites which are designated as Scheduled Monuments, including the Exeter City Walls and the Old Exe Bridge, which are protected by law under the Ancient Monuments and Archaeological Areas Act 1979. Separate consent is required for works to Scheduled Monuments. Exeter also has an Area Of Archaeological Importance (AAI) which covers large parts of the city centre. This is one of only five such areas in England and Wales.
- 11.13 Not all important remains or buildings are Scheduled Monuments, listed or located within the AAI. The HER is a useful indicator of archaeological potential in the city and the City Council's Archaeology And Development Supplementary Planning Guidance and Historic England's Advice Note 17 on planning and archaeology provide further information on this topic.
- 11.14 Where development has the potential to adversely affect previously undiscovered heritage assets, the results of archaeological investigations may need to be submitted with planning applications in order to provide sufficient information for determination. The City Council will assign a level of significance to that asset which will inform any mitigation required. The quality and significance of Exeter's archaeological deposits are such that preservation in situ may be the appropriate mitigation.
- 11.15 There are numerous other non-designated heritage assets that are not statutorily protected but do comprise an integral part of the city's environment and distinctive character. The significance of these assets is a planning consideration when determining applications.
- 11.16 In terms of the condition of heritage assets, Historic England updates the Heritage at Risk Register annually to help understand the overall state of England's historic sites. The programme identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development and most in need of safeguarding for the future.
- 11.17 The City Council will monitor and manage buildings as well as other heritage assets where they are considered to be at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and a willingness to consider positively those appropriate development proposals that would ensure the repair and maintenance of the asset provided they are suitable for the asset and its context.
- 11.18 The City Council works with relevant stakeholders to encourage better understanding of the heritage assets on the national Heritage at Risk Register. Where appropriate,

the City Council will encourage heritage partnership agreements, particularly for Listed Buildings on any 'at risk register'.

Development affecting heritage assets

- 11.19 Heritage-led regeneration and the positive role that Exeter's heritage plays in local identity is a key factor in development. It is important that the potential impacts on all heritage assets and their settings, whether designated or non-designated, are considered through the planning process. The NPPF is clear at paragraph 205 that, when considering the impact of a proposed development on the significance of a heritage asset, great weight should be afforded to the conservation of the heritage assets with the weight linked to its importance regardless of the level of potential harm or loss resulting from proposals. When devising development proposals affecting heritage assets, Historic England has an extensive range of guidance and technical advice on looking after historic buildings and sites, climate change adaptation, retrofit and energy efficiency, recording and project management.
- 11.20 All planning applications affecting heritage assets or their settings must include a Heritage Statement describing the significance of the heritage asset and/or their setting, and assessing the impacts of the proposed development upon it. The level of detail should be proportionate to the asset's importance and the assessment should be used to inform and explain the design concept. Large scale developments are expected to consider how they can improve public access to, and interpretation of, the historic environment.
- 11.21 All planning applications affecting heritage assets must be considered in terms of the impact of the proposal on the significance of the heritage asset. 'Significance' in terms of heritage related planning policy is defined in the NPPF glossary as 'the value of a heritage asset to this and future generations because of its heritage interest'. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 11.22 All heritage assets have settings, defined in the NPPF as the surroundings in which a heritage asset is experienced. The extent and importance of a setting is not fixed and may change as the asset and its surroundings evolve. A thorough assessment of the impact on the setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 11.23 Policy HH1 sets out the key heritage considerations for development in Exeter. When considering the impact of development on heritage, the priority is to retain and enhance heritage assets considered in the context of their significance. Where it is not possible to retain an asset, or where there are substantial public benefits that outweigh the loss (wholly or in part), appropriate mitigation will be required. This could include the recording, analysis, reporting and archiving of the significance of the asset. This must be agreed with the City Council as the local planning authority in advance of development commencing on site. Advice and guidance can be sought from the City Council and Historic England.
- 11.24 Policy HH1 also outlines the different considerations for development to take into account depending on whether the heritage asset affected by a development proposal is designated or non-designated, and in the case of designated heritage assets, whether the harm is substantial or less than substantial.

- 11.25 Whether a proposal causes substantial harm or less than substantial harm will be a judgment for the decision maker having regard to the circumstances of the application. In general terms, substantial harm is determined by considering the degree of harm to the asset's significance and its special architectural or historic interest. The harm may arise from works to the asset or from development within its setting.
- 11.26 When considering whether the public benefits of a development are substantial and outweigh the harm, they should be of a nature or a scale to be of benefit to the public at large and could be anything that delivers economic, social or environmental objectives. Public benefits do not always have to be visible or accessible to the public in order to be genuine. For example, works which secure an asset's future as a designated heritage asset could be a public benefit.
- 11.27 In addition to protecting and enhancing heritage assets, consideration will need to be given to whether development can improve public access to, and interpretation of, the asset. Development should weave heritage assets into green infrastructure and high quality public spaces in order to enhance public enjoyment of the historic environment.
- 11.28 Planning obligations could be used, where appropriate, to secure improvements to, and the mitigation of, adverse impacts on the historic environment. This could be provided through archaeological investigations, access and interpretation and the repair and reuse of heritage 'at risk' buildings or other heritage assets.

HH1: Conserving and enhancing heritage assets (Strategic policy)

Exeter's iconic and ancient heritage will continue to make an essential contribution to the liveability, culture, economy and tourism offer of the city. Development proposals will be required to conserve and where appropriate enhance Exeter's rich heritage and to ensure that development makes a positive contribution to the historic environment and the cultural offering and identity of the city. All large scale development proposals will be required to improve access to, and interpretation of, the historic environment.

Development proposals that affect designated heritage assets and/or their settings will only be supported when they conserve and, where appropriate, enhance or reveal, the significance of the asset in the form of fabric, settings, character or appearance, and any features of special architectural, historic or archaeological interest.

Development proposals that would result in substantial harm to, or loss of, a designated heritage asset, including Listed Buildings, will not be permitted unless there is clear and demonstrable justification that they are necessary to achieve substantial public benefits that outweigh the harm or loss. Where development proposals would result in less than substantial harm to the significance of a designated heritage asset, the public benefits must demonstrably justify and outweigh the harm.

Development proposals that would result in substantial harm to the significance of a non-designated heritage asset, including those on the List Of Buildings of Local Importance, will only be supported if the public benefits clearly outweigh the harm.

Development proposals that would result in harm to heritage assets will be required to be accompanied by an appropriate mitigation strategy agreed upon by the City Council.

Conservation Areas

- 11.29 Conservation Areas in Exeter are designated to protect the distinctive character and architectural significance of the city's historic environment. These areas reflect the city's rich heritage and contribute to its cultural identity, enhancing the overall quality of life for residents and visitors.
- 11.30 The character of each Conservation Area is shaped by a combination of its historic buildings, layout and public spaces. Development proposals must therefore demonstrate sensitivity to the unique features of the area, ensuring that any alterations respect the established character and contribute positively to the local environment.
- 11.31 The City Council is committed to safeguarding Conservation Areas and will not support proposals that cause significant harm to the Area, unless there is clear evidence that the public benefits of the development outweigh the potential harm. This approach ensures that the value of our heritage assets is preserved for future generations, whilst accommodating necessary growth and change within the city.
- 11.32 Policy HH2 sets out the importance of maintaining the architectural integrity and historic significance of Exeter's Conservation Areas.

HH2: Conservation Areas

Development proposals will be required to conserve the distinctive character, special architectural value and historic significance of Conservation Areas.

Development proposals which would result in significant harm to a Conservation Area will only be supported if the public benefits clearly outweigh the harm.

Archaeology

- 11.33 Exeter's archaeological heritage plays a vital role in understanding the city's historical narrative, revealing layers of human activity and cultural development over time. Sites of both national and local importance can significantly contribute to the community's identity, offering educational opportunities and enhancing local pride.
- 11.34 Development proposals must be assessed for their potential impacts on archaeological assets, with a focus on early engagement with City Council and Historic England.
- 11.35 Exeter has a defined Area of Archaeological Importance (AAI) as established by the Ancient Monuments and Archaeological Areas Act 1979. The AAI is a significant area in the city centre that recognises the unique value of the city's below and above ground archaeological remains. Although some places may not be fully surveyed, they are valued historically and this designation aims to draw attention to the potential of discovering archaeological remains there. The AAI area, which is shown

on the Policies Map, serves as a guide for managing development in areas where important archaeological remains may exist.

- 11.36 Development must take into account the presence of archaeological remains in the city irrespective of its significance, although the relationship between development and the asset will vary according to the significance of the remains. For example, development will not be considered appropriate where it would cause harm to archaeology of national importance, whilst development could be appropriate where it would affect regionally or locally significant remains when benefits outweigh the impacts. The use of archaeological evaluations and assessments at the preapplication stage will be encouraged to identify and mitigate potential risks to heritage sites.
- 11.37 Development proposals should respond proportionately to archaeological assets depending on their significance. There are a range of approaches to manage development impacts. Innovative design solutions should be considered to incorporate archaeological findings into new developments. This may involve creating interpretive displays or integrating historical elements into landscaping and architecture. Such approaches would not only preserve Exeter's heritage but also contribute to a richer urban experience for residents and visitors.
- 11.38 Preservation in situ is the preferred approach for protecting archaeological remains, ensuring that they are maintained within their original context. However, when this is not feasible or viable, developers will be required to implement a robust strategy for recording, analysing, reporting and archiving which should involve collaboration with local archaeological organisations and community groups. This not only fulfils legal obligations but also fosters community engagement.
- 11.39 The importance of public access to archaeological sites cannot be neglected. Development should include provisions for creating accessible routes and information panels that educate the public about the city's archaeological significance. This enhances community involvement and appreciation for Exeter's rich historical fabric, ultimately supporting heritage, tourism and local economic development.
- 11.40 Policy HH3 sets out how development proposals will be considered in the context of archaeological assets.

HH3: Archaeology

Development proposals which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, or which would cause harm to its setting, will not be permitted. Development proposals will be required to preserve, and where practical, improve access to and interpretation of, nationally important archaeological remains, in situ.

Development proposals which would affect archaeological remains of regional or local importance may be considered acceptable if the benefits outweigh the impacts on the remains.

If preservation in situ is not feasible or appropriate, the remains must be subject to a scheme of works including recording, analysing, reporting and archiving undertaken by an

appropriately qualified professional in accordance with a scheme of works to be agreed with the City Council prior to the commencement of development. The scheme of works will be required to consider community involvement. All records may be made publicly accessible within a timeframe agreed by the City Council.

Heritage assets and climate change

- 11.41 In order to safeguard our heritage assets and to sustain our cultural heritage for future generations, the assets need to be adaptable to, and protected from, the effects of climate change. Historic buildings can also positively contribute towards reducing carbon emissions through sensitive and sympathetic adaptations that secure their retention, repair, retrofit and reuse alongside conservation of the significance of the heritage asset. The embodied energy (the energy used within the materials and construction activities) in historic buildings means that their retention aligns with the ambition to reduce carbon emissions and the priority to conserve heritage assets. Given the number of heritage assets in Exeter it is vital that they play a role in both climate change mitigation and adaptation.
- 11.42 Addressing and adapting to climate change may require alterations to historic buildings or development that affects heritage assets, including their settings. This could include development or retrofit to ensure the building's retention, energy generation, or protection from flooding. A holistic view should be taken when considering such alterations. This should balance the need to safeguard the future of the asset and its conservation, and where appropriate, enhancement, of its significance and historic and architectural qualities. Alterations to Listed Buildings should improve energy efficiency, reduce emissions, enable renewable energy generation and/or enable the building to adapt to climate change whilst taking considerable care to preserve the historic fabric, character and appearance of the building. This approach is set out in Policy HH4.
- 11.43 Historic England offers information and advice on many related topics including energy efficiency and historic buildings. Historic England Advice Note 18 sets out more detail regarding their requirements for adapting historic buildings for energy and carbon efficiency. The advice note supports the overarching goal of promoting the sustainable retention, careful restoration and innovative adaptation of historic buildings, aligning with established British Standards. The Government's publication PAS 2035:2023 (Retrofitting Dwellings For Improved Energy Efficiency) should be used to inform the detail of proposals on this matter.

HH4: Heritage assets and climate change

Development proposals that contribute to addressing climate change and affect heritage assets will only be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset and its setting.

Development proposals that contribute to addressing climate change and affect nondesignated heritage assets will be supported where they repair, retrofit and adaptively reuse historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change in accordance with appropriate British Standards.

Conserving and enhancing the Exeter City Walls

- 11.44 The Exeter City Walls are largely designated as a Scheduled Monument, legally protected due to their national historical importance. Around 70% of the circuit remains intact, delineating the origin of the city. The Walls became subsumed by modernity as the city expanded and faced twentieth century transport infrastructure and development demands. The challenge lies in re-energising and re-imagining the significance of the Walls and all they symbolise into a sustainable future city and to celebrate the individuality of the inherited city.
- 11.45 The Walls play an important role in defining the historic city and contribute to the social, cultural and economic life of the city. Their presence on the national Heritage at Risk Register highlights their vulnerability and priority for safeguarding. The designation offers the Walls a high degree of protection, setting a precedent that development proposals that cause loss, substantial harm or restrict public access to the Walls will not be permitted.
- 11.46 The City Council will seek ways to secure funding to support a programme of works to conserve, repair, maintain and enhance the Walls and improve public access and visibility to celebrate their presence and meaning. Contributions from development proposals will be encouraged to ensure enhancements are carried out, reinforcing the commitment to safeguard this vital heritage asset. This may include planning obligations to secure improvements and mitigate adverse impacts from development.
- 11.47 Policy HH3 recognises the importance of the Walls Scheduled Monument to Exeter and sets out how development will be required to response to this.

HH5: Conserving and enhancing Exeter City Walls

The Exeter City Walls play an important role in defining the historic city, contribute to the social, cultural and economic life of the city, and as a Scheduled Monument covered by the Exeter City Wall Act, are legally protected due to their national historic importance. Development proposals that cause harm or restrict public access, to the Exeter City Walls will not be permitted.

Development proposals will be required to conserve and enhance the fabric and settings of the Exeter City Walls and to demonstrate, where feasible, that they improve public access, understanding and visibility of the Exeter City Walls.

Contributions to the repair, maintenance, enhancement and interpretation of the Exeter City Walls will be required where appropriate.



12. Culture and tourism

Vision – City of culture

Addressing the importance of culture and tourism links to the aim in the 2040 vision of being a city of culture. As the city evolves, promoting culture should be embedded in the city's growth, playing a vital role in creating high quality development and raising the profile of the city.

Vision - Accessible world class education

Addressing the importance of culture and tourism links to the aim in the 2040 vision of creating access to world class education and training. Enabling improvements to educational and cultural facilities will support employers to attract and nurture a skilled workforce.

Objective: Explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination.

Introduction

- 12.1 Culture is everywhere; it is all-embracing, it is the fabric of what we are and since it is difficult to see, it can appear invisible. Culture is who we are, how we behave, what we think and how we spend time. On this basis it shapes our perceptions and fashions the physical fabric and landscapes we build and defines our economy, our social life, our use of technology and our cities.
- 12.2 Exeter is a historic but modern city whose compact size and location means it offers a great balance between urban and rural life. Enhancing Exeter's cultural offering will be key to future success, building the sense of place and belonging in the city. Exeter is committed to being a healthy and active city with culture embedded as standard to enable people to live fulfilled lives. This will help to promote Exeter as a city of culture and further drive the identity and attraction of the city.
- 12.3 The Exeter Plan provides for the exploration and celebration of the cultures of the city and our communities as they evolve. The cultural offering of the city will be important to enhance the tourism and economic growth of the area, to support the spatial strategy and the delivery of strategic and high quality brownfield development. Urban living offers a cultural dynamic that is different from rural areas. Furthermore, embedding culture into placemaking and the regeneration of sites including thoughtful architecture, infrastructure, and public realms ensures the creation of high quality developments that resonate with the community and attract visitors.
- 12.4 Through working collaboratively and inclusively with delivery partners on initiatives such as the Cultural Compact, Exeter Cultural Strategy, Live And Move (the Sport England Local Delivery Pilot), the UNESCO City Of Literature designation and the Public Art Strategy, the City Council will use the Exeter Plan to pursue opportunities for engagement with literature, creativity, the environment and physical activity in seeking to enhance the city's tourist and cultural offering. The Exeter Plan also links with the skills strategy that identifies the creative industries as important for supporting an environment where creative and cultural activity can flourish.

City of culture

- 12.5 Cultural richness includes anything that relates to how people live. Heritage, recreation, sport, art, literature, music, the natural environment and religion interlock as part of the culture of Exeter, shaping the city's identity and character and contributing to the city's economy, prosperity and tourism offer, whilst also supporting inclusive and healthy communities. The importance of cultural, tourism and artistic opportunities in placemaking is essential to Exeter's competitiveness and success in attracting residents, businesses and tourists, identified through Liveable Exeter Principle 7: Connected Culture. The Exeter Plan will support high quality cultural placemaking projects in the public realm and community facilities and deliver engaging and active places and spaces.
- 12.6 Tourism plays a vital role in Exeter's economy, with an estimated £205 million generated in 2023. This includes direct spending from visitors, supporting local businesses and creating jobs across sectors such as accommodation, retail, catering and attractions. Exeter's status as a thriving tourism destination is further strengthened by the award of Local Visitor Economy Partnership (LVEP) status to Devon by VisitBritain. This public-private sector collaboration will enable Exeter to work more closely with neighbouring destinations to manage and promote the growth of Devon's visitor economy.
- 12.7 A new Growth Plan will be developed through the LVEP, complementing Exeter's own Visitor Strategy which is set to launch soon. Both of these initiatives will support sustainable tourism and enhance Exeter's cultural offering. In 2023, Exeter hosted over 362,000 staying tourists, who spent £106.97 million across various categories. These figures reflect the diverse experiences Exeter offers, from its rich cultural and natural heritage to its vibrant arts scene. As part of the city's ongoing cultural development, the Exeter Plan will continue to support initiatives that foster collaboration and innovation within the tourism sector, ensuring that Exeter remains a thriving destination for visitors and residents alike.
- 12.8 Cultural activity acts as a community and civic connector, contributes to quality of life and helps to deliver experiences that prompt conversation and reflection, engender debate and critical thinking and deepen understanding of the world. These are essential qualities for Exeter to be a sustainable, healthy and inclusive city where everyone thrives. The Exeter Plan will support the creation of resilient, adaptable, networked communities and centres that support civic pride and local identity.
- 12.9 The River Exe and its maritime heritage play a crucial role in shaping Exeter's cultural identity. This connection is not only important for its historical significance but also for tourism and active recreation. The Exe Estuary Trail, which stretches from Exeter to the coast, provides a vital asset for active tourism, encouraging sustainable travel while connecting visitors to Exeter's rich natural and cultural landscape. By integrating these elements, allocations in the Exeter Plan support placemaking efforts that enhance both the city's appeal and the wellbeing of its communities, in line with the Liveable Exeter principles.
- 12.10 Exeter's heritage, cultural sector, education and science institutions, businesses, sports, natural environment and increasingly diverse communities generate a unique sense of place and possibility. They also generate a sense of purpose to face our major challenges. Culture will help to drive investment and high quality sustainable placemaking across the city, drawing communities together to collaborate. Exeter has established a Cultural Compact with support from Arts Council England. The Compact puts value and the importance of the arts at the centre of Exeter's future.

- 12.11 The Exeter Civic University Agreement establishes how city partners will work together to deliver shared goals on community priorities which highlight an ambitious culture and tourism offer. The City Council, the Royal Albert Memorial Museum (RAMM) and the University of Exeter have also worked together on a partnership programme called Creative Arc to create new ideas and projects to address big societal challenges.
- 12.12 This collaboration will act as a catalyst for culture-led development and social change. Through knowledge sharing and collaborative working it aims to maximise connectivity with partners across the city and engagement with the community in areas of heritage, regional development, economic regeneration, education, employability and research, attracting significant new investment into the city. It will build on Exeter's profile as a UNESCO City Of Literature identifying creativity and cultural industries as important to Exeter's profile and reputation as a liveable city. Work with other key educational partners including Exeter College also promotes the importance of cultural activity in creating strong communities.
- 12.13 Public art will be an important way of increasing the cultural offering and interest of the city. The City Council and Exeter Culture, together with the community-based arts organisation Artwork Exeter, have created a Public Art Strategy seeking to make the most of future art opportunities in a growing city. This seeks to ensure that public spaces are designed to engage interest, to be stimulating and unique and act as a focal point to encourage pride of place. It also recognises that public spaces should be active, distinctive and special and that public art is a powerful tool in regenerating and celebrating our city.
- 12.14 The Public Art Strategy will be a reference point for the requirements of large scale residential, employment and commercial developments regarding design and public spaces, increasing its profile and setting out expectations. All art for the city, including public art, should meet the key criteria of quality, inclusion and sustainability. A shared set of values should be adopted by all partners to foster positive collaborations and partnership working.

Cultural facilities

- 12.15 Exeter has many cultural and tourist facilities and institutions that provide interest, enjoyment and opportunities for enrichment to our communities. Alongside Policy IF3 which seeks to protect community facilities, Policy C1 sets out to protect facilities that are vital to tourism and the cultural life of the city. Policy C1 also seeks to support development that enhances the profile of Exeter as a city of culture. Examples of these facilities and bodies which are vital to the city's culture and contribute to the city's tourism offer include (the list is not exhaustive):
 - The Royal Albert Memorial Museum and its archives;
 - The University of Exeter;
 - Exeter College;
 - Exeter's theatres: Northcott, Barnfield, Cygnet and Theatre Alibi;
 - The Corn Exchange;
 - The Phoenix Centre:
 - Libraries including the Westcountry Studies Library and Devon Heritage Centre;
 - The Cathedral as the heart of the historic city;
 - The Islamic Centre;
 - Exeter Hindu Cultural Centre;

- Exeter Gurdwara, Cultural Centre;
- Exeter Synagogue;
- A host of other places of worship for a variety of religions;
- The historic quayside, the canal, the River Exe and the estuary;
- The Underground Passages;
- The Custom House;
- Roman and medieval remains including the Exeter City Walls;
- The Devon and Exeter Institution:
- Tuckers Hall:
- St Nicholas Priory;
- Northernhay Gardens;
- Rougemont Gardens;
- Exeter City Football Club;
- Exeter Chiefs Rugby Club; and
- An array of community buildings and facilities serving diverse groups and purposes.
- 12.16 It is vital to retain viable cultural, sporting and tourism uses throughout the city and improve these facilities and assets to develop the city's cultural offering.
- 12.17 Policy C1 sets out the approach to protecting and enhancing cultural and tourism facilities. Development proposals which enhance cultural facilities and promote public access to such facilities will generally be supported. In most cases, the loss of existing cultural and tourism facilities will not be acceptable. However, there may be specific cases when the loss of a facility is justified because robust evidence clearly demonstrates a lack of demand and the facility is no longer viable. Planning applications will need to include such evidence which should reference all possible sources of finance available (including grant funding). Where a cultural facility is not viable, evidence will be required and it will also be necessary to demonstrate that an alternative community use would not be viable on the site.
- 12.18 Evidence of viability should consider factors such as financial performance, levels of demand, market conditions and operational challenges. Long term sustainability should also be a key consideration in assessing viability, ensuring that cultural facilities can adapt to future needs.
- 12.19 Cultural and tourism facilities should be accessible by active and sustainable travel to improve health and wellbeing, enhance the local environment and support our ambition of achieving net zero by 2030.
- 12.20 In line with Liveable Exeter Principle 7: Connected Culture, appropriate temporary or meanwhile uses of vacant buildings and public spaces for creative or cultural activities will be supported where local amenity will not be harmed. This could occur when sites are being developed. Development proposals should be progressed through engagement with local communities to ensure that local identity and culture are represented.
- 12.21 Developers should engage with local communities in the design of their hoardings and surrounding spaces during development in order to further enhance Exeter's cultural landscape. This could include workshops and feedback sessions, allowing the community to contribute their perspectives and cultural insights. By reflecting local identity and creativity in these temporary structures, developers can enhance community pride and create a more vibrant atmosphere that showcases the city's cultural heritage.

C1: Protecting and enhancing cultural and tourism facilities (Strategic policy)

Existing cultural and tourism uses will be protected unless it is demonstrated that the use is no longer viable and there is no reasonable prospect of the site being used for cultural and tourism uses in the future.

Development proposals that enhance the profile and identity of Exeter as a city of culture and tourist destination will be supported where they do not have unacceptable impacts on local amenity and the quality of the natural, built and historic environments.

The temporary use of sites for cultural activities, particularly in locations where they can help to animate the public realm, will be supported where they will not significantly harm local amenity.

Development and cultural provision

- 12.22 Large scale development proposals should include appropriate cultural and tourism facilities as part of a mixture of uses onsite or within the wider provision of community infrastructure for the local area. Opportunities may also include appropriate cultural and creative meanwhile uses of buildings or spaces during development. The City Council will support formal and informal arts and cultural activities within shared spaces.
- 12.23 Policy C2 outlines that large scale development proposals will be expected to reflect local cultural identity and provide high quality, creative public spaces, cultural projects and public art proportionately to the scale of development.
- 12.24 Policy C2 also sets out that developers should engage with local communities, focusing on targeted outreach in the process of identifying the development's contribution to local cultural provision. This should include consideration of the need for cultural spaces and services that reflect local identity, aspirations and diversity.

C2: Development and cultural provision (Strategic policy)

Development proposals should be sensitive and sympathetic to local identity and cultural practices.

All planning applications for large scale development proposals should be accompanied by a Cultural Plan demonstrating how the development will contribute to local cultural provision in proportion to the scale of development.

Developers should engage with local communities to ensure this provision reflects local identity.



13. High quality places and design

Vision - Liveable and connected

Addressing the need for high quality places and design links to the 2040 vision of Exeter being a liveable and connected city. Providing high quality developments, public spaces and infrastructure - including green infrastructure - will improve the city as a place to live, work and visit.

Vision - Healthy and inclusive

Addressing the need to provide high quality places and design links to the 2040 vision of creating a healthy and inclusive city. Attractive places and high quality design provide public spaces, access to nature and opportunities for active travel which improve health and inclusivity.

Vision - A leading sustainable city

Addressing the need to provide high quality places and design links to the 2040 vision of Exeter's potential as a leading sustainable city. Placemaking supports people in adopting more sustainable lifestyles which strengthens the identity of Exeter as a leading sustainable city with vital net zero ambitions.

Vision – City of culture

Addressing the importance of high quality places and design links to the 2040 vision of Exeter being a city of culture. Design will be influenced by the culture of our city to provide attractive environments with a strong identity and communities enriched by cultural activity.

Objective: Deliver the development we need in high quality, liveable, connected places to support our local communities, economy, local environment and push towards net zero.

Introduction

- 13.1 The quality of the places in which we live and work and that we visit is fundamental for so many reasons, including to support our health and wellbeing, attract investment, generate pride in our city and help achieve our net zero ambitions. Development offers opportunities to create high quality places that respond to Exeter's distinct characteristics, reflect local culture and the historic environment, provide appropriate green space and integrate with existing communities, promoting social cohesion and healthy lifestyles.
- 13.2 The Exeter Plan must ensure that development is located in the right place and provides well designed buildings and spaces. On this basis, development quality is a key part of the spatial strategy which sets out the importance of providing high quality, mixed use development at optimal densities appropriate to local characteristics to minimise the need to travel and maximise active and public transport. High quality places must also be supported by the delivery of a range of infrastructure, an issue which is considered in the Infrastructure and facilities chapter of the Exeter Plan.
- 13.3 Building on the spatial strategy, the Liveable Exeter principles provide more detailed concepts which will ensure that strategic mixed use brownfield developments provide

- memorable places, outstanding quality, welcoming neighbourhoods, liveable homes, safe and healthy streets and spaces for people and wildlife.
- 13.4 Thes Liveable Exeter principles for strategic mixed use brownfield developments have been further developed into a series of design principles that will apply to all developments, requiring high quality development across the board. Design codes and other guidance produced and adopted by the City Council will also play a key role in achieving this.

Design principles

- 13.5 Producing high quality places is about more than just providing attractive buildings. It relies on the right uses being located in the right locations. It requires an understanding of how a space will be used by the community. It requires an appropriate amount of development for a site. It is based on an appropriate layout, linking to the surrounding area. It is about the spaces and infrastructure to be delivered. And it is about the specific scale and design of buildings and how they relate to each other and public spaces.
- 13.6 Placemaking and design are vital at every stage of the development process. They can only be achieved by considering all relevant issues at the earliest possible stage and by taking a collaborative approach that involves the community and stakeholders.
- 13.7 Ensuring high quality design needs us to look forwards and backwards; there is significant value in both protecting and enhancing what is of heritage significance and in recognising Exeter's distinctive character. In addition, it is important that development creates new distinctive places which may become of townscape value and heritage significance in the future.
- 13.8 Providing developments of high quality design also requires detailed consideration of practical and technical issues. For example, effective waste management should be considered in the design, enabling appropriate access for waste collection and incorporating facilities for waste storage to promote sustainability.
- 13.9 In order to accommodate our housing needs, there is an expectation that development is undertaken at optimal density. Considerable care must be given to the design of these schemes to ensure that they are not overbearing in nature, particularly where the built form of surrounding areas are of lower density. The Viewpoints, Density and Heights Study should be referred to in preparing proposals for development. Development should also be in line with Healthy Streets design principles.
- 13.10 Policy D1 sets clear design principles for development and sets parameters to guide decisions so 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.
- 13.11 The policy also requires development to take into account any adopted design codes and Supplementary Planning Documents (SPDs). The Council has a number of SPDs covering a variety of different topics. These include the Liveable Water Lane SPD which provides a design code for the largest allocation in the Exeter Plan. Further design codes may be produced by the City Council in future.

D1: Design principles (Strategic policy)

To promote high quality design and placemaking, development proposals will be supported where they:

- a. Create high quality, distinctive places through the provision of a compatible mix of uses;
- b. Integrate measures appropriately to address climate change mitigation and adaptation;
- Provide a layout and built form that makes efficient use of the site and complements the surrounding area and buildings through appropriate densities, massing and building heights;
- d. Are sympathetic to local character, distinctiveness and identity;
- e. Respect the historic environment and retain and refurbish existing buildings of high townscape and historic value, enhancing their setting wherever possible;
- f. Reinstate former street patterns;
- g. Provide high-quality public realm and landscape design making appropriate provision for public art and cultural activity as an integral part of the proposal;
- h. Adopt contemporary and innovative design solutions;
- Include high-quality architectural composition, detailing and materials which reflect local distinctiveness;
- j. Retain existing trees and vegetation of significant ecological and amenity value and provide additional native and climate change resilient planting throughout the development and in all new streets;
- k. Are designed to be inclusive for all groups;
- I. Adopt a comprehensive response to existing site constraints, utilities and infrastructure provision; and
- m. Consider all extraction systems and refuse facilities during the design phase of development so that they are well integrated into the proposal.

All development must take into account any relevant guidance outlined in any adopted design-related Supplementary Planning Document and/or design code.

Designing-out crime

- 13.12 Exeter is a comparatively safe city with low levels of crime. However, the personal and financial costs to those affected by crime are significant and the effects are widely felt and influence the perceptions people have about crime. Many people perceive crime to be a problem. This fear of crime can restrict people's lives, affect confidence in public agencies and deter investment.
- 13.13 Planning policy can play an important role in ensuring that new developments contribute to creating safer environments. Policy D2 emphasises the integration of crime prevention measures into the design process to reduce crime, fear of crime, and anti-social behaviour. This approach is supported by the National Planning Policy Framework (NPPF), which encourages design strategies that prioritise public safety.
- 13.14 Crime prevention through design is essential for shaping spaces that feel secure and foster community wellbeing. Key principles include natural surveillance, provision of well-lit areas and ensuring clear boundaries between public and private spaces.

- 13.15 The layout of a development is critical in avoiding conflicts between different uses, ensuring safe and accessible routes for pedestrians and vehicles. Appropriate lighting and passive surveillance help maintain visibility in public spaces, reducing the potential for anti-social behaviour and enhancing safety at all times of day.
- 13.16 Policy D2 also promotes the importance of creating active spaces that support community activity. Lively areas with a mix of activities can deter crime by fostering a sense of ownership and responsibility. It is important that these spaces are designed to balance accessibility with security, ensuring both public enjoyment and safety.
- 13.17 Designing-out crime should reduce the need for active security features such as CCTV although such measures may be needed as appropriate. Development proposals should incorporate active security features without detracting from the character and function of the area.

D2: Designing-out crime

Development proposals will be supported where they demonstrate that crime prevention and creating a safe environment have been effectively integrated into the design of the scheme.

Development proposals should:

- Be designed with management and maintenance in mind to discourage crime, fear of crime and antisocial behaviour;
- b. Provide a layout that is structured to avoid conflicts between different uses;
- c. Ensure well-defined, easily accessible and well-overlooked routes for people and vehicles that promote convenient movement and maintain security;
- d. Incorporate appropriate lighting to ensure all publicly accessible spaces are overlooked and managed to reduce opportunities for crime and anti-social behaviour;
- e. Promote a sense of ownership and community responsibility clearly defining public and private realms;
- f. Ensure that the level of activity is appropriate to the area, promoting a sense of safety and reducing the fear of crime throughout the day, evening and night; and
- g. Include appropriate, well-designed security features to support passive, safe design.

Advertisements

- 13.18 In addition to planning applications for regular types of development, the City Council also has responsibility for making decisions on applications for advertisements. This process is managed through a specific set of regulations for advertisement consent which are slightly separate from the regular planning process.
- 13.19 The NPPF states that there are only two considerations for making decisions on advertisement consent applications:
 - The effect on amenity; and
 - Public safety.

- 13.20 This narrow set of considerations does not enable restrictions to be placed on what is being advertised through the planning process. This is a matter for the Advertising Standards Authority.
- 13.21 Policy D3 sets out the more detailed matters relating to amenity and public safety which can be considered when making decisions relating to applications for advertisement consent. As with the other design policies in the Plan this will play a role in promoting high quality places in the context of an assessment of a proposal's local impact. In some cases, the consideration of amenity and public safety will be quite separate. In other cases, including in relation to the need to avoid street clutter, amenity and public safety may be closely related.

D3: Advertisements

Proposals for advertisements will be supported where individually and cumulatively they would not harm amenity or public safety taking account of:

- a. The positioning, scale, materials and colour of the proposal;
- b. The lighting of the proposal in the day, evening and night;
- c. The character and historic, architectural and cultural significance of buildings, their settings and the wider area;
- d. The safety and functionality of the highway and wider transport network; or
- e. The safe operation of any security and surveillances systems.

Digital advertising installations should generate on-site renewable energy where possible.



14. Health and wellbeing

Vision – A healthy and inclusive city

Addressing the potential for planning to improve health and wellbeing links to the 2040 vision of Exeter being a healthy and inclusive city. Improvements to active travel routes, creating attractive public spaces, providing access to nature and access to housing and jobs all play a considerable role in improving health, wellbeing and inclusivity for our communities.

Vision – The most active city in the United Kingdom

Addressing the potential for planning to improve health and wellbeing links to the 2040 vision of Exeter becoming the most active city in the United Kingdom. Ensuring development takes place in appropriate locations, minimises the need to travel and provides routes and infrastructure for walking and cycling will be central to improving health and wellbeing.

Objective: Promote inclusive development which supports communities in becoming healthier and more productive and helps Exeter to become the most active city in the United Kingdom.

Introduction

- 14.1 Generally, Exeter has a good quality housing stock, a relatively large number of council houses and high levels of employment. Exeter also has high levels of walking and cycling and large areas of accessible green space. A broad range of health facilities including the Royal Devon and Exeter Hospital and multiple GP surgeries provide access to healthcare across the city. All these factors support health and wellbeing.
- 14.2 The picture of health and wellbeing is not the same across the city. People living in its more disadvantaged areas can have comparatively poor health, lower literacy and may experience frailty earlier in life. Although pollution levels in Exeter are low in most places, there are issues of poor air quality and noise in some areas close to the main roads that can affect the overall health of people spending time in those areas. In some areas and at certain times, crime and anti-social behaviour can be a concern.
- 14.3 The health and wellbeing of communities in Exeter and Devon more widely is assessed through the Joint Strategic Needs Assessment and the One Devon Partnership Integrated Care Strategy. This helps to inform the approach set out in the Exeter Plan as required by the National Planning Policy Framework (NPPF) which requires at paragraph 97 that planning policies should take into account and support the delivery of local strategies to improve health and wellbeing.
- 14.4 The Exeter Plan will play a part in improving health and wellbeing by providing high quality housing, supporting job creation, enabling increases in physical activity, supporting 50% of trips within the city being made on foot or cycle, enhancing nature, supporting improvements in air quality and supporting the delivery of the health infrastructure we need.

14.5 To further promote healthy communities, development proposals should consider local health outcomes, encourage active travel with safe walking and cycling routes, and provide access to healthy food options.

Health and wellbeing

- 14.6 Planning plays an important role in the health and wellbeing of residents. It can promote community inclusion, deliver healthy neighbourhoods, promote active lifestyles, reduce environmental impacts on health and ensure the safety of communities and individuals. The Devon Health and Wellbeing Board has produced a Joint Health and Wellbeing Strategy, which discusses the importance of new development in addressing these issues.
- 14.7 On a national level, the Town and Country Planning Association have launched a campaign that seeks to improve the quality of new houses coming forward in England called 'Healthy Homes'. This seeks to introduce 11 healthy homes principles that all new homes should meet. A Healthy Homes Bill has been prepared which, if passed into law, would place additional responsibilities on local planning authorities to have regard to the healthy homes principles. In the interim, we have sought to address the need for healthy homes in the policies proposed in the Exeter Plan, including this chapter.
- 14.8 Policy HW1 requires large scale residential development proposals to consider a number of key health and wellbeing priorities at an early stage in their design and to demonstrate how this will be achieved through a health impact assessment.
- 14.9 More details on the key requirements to be considered through the development process are provided below. These relate to the content of policy D2 which covers designing-out crime.
- 14.10 Development should promote community inclusion by:
 - Delivering a variety of housing tenures and types;
 - Supporting a range of employment opportunities;
 - Avoiding severance (e.g. by a major road that is difficult to cross);
 - Providing local infrastructure such as schools, social care and community facilities;
 - Enabling good access by active travel and public transport; and
 - Providing places and buildings which are accessible to all, in particular those with protected characteristics and those with care responsibilities.
- 14.11 Development should encourage healthy neighbourhoods by:
 - Avoiding an over-concentration of hot-food takeaways, particularly along routes to schools;
 - Considering the potential for allotments to address an increasing demand; and
 - Delivering a range of employment premises to support a mix of jobs and encourage independent stores.
- 14.12 Development should promote active lifestyles by:

- Retaining or providing open, natural and recreational spaces;
- Providing links to open, natural and recreational spaces;
- Minimising the need to travel by car; and
- Encouraging walking and cycling away from main traffic routes.

14.13 Development should have a positive impact on health by:

- Creating an attractive environment for housing and employment including street trees and other spaces for wildlife;
- Minimising air and noise pollution and ensuring existing sources do not negatively affect residents;
- Ensuring dust, noise, smoke, light and odours emitted during building works are controlled;
- Ensuring that new homes provide year-round thermal comfort for inhabitants;
 and
- Including features to mitigate the impact of climate change, especially those providing for urban cooling in the face of rising summer temperatures.

14.14 Development should ensure safety and wellbeing by:

- Including appropriate layouts for roads and public spaces that prioritise walking and cycling, manage driving speeds and reduce conflict between road users;
- Providing well-defined, well overlooked and well used routes, with spaces and entrances that provide for convenient movement without compromising security;
- Ensuring all features have a purpose and designed with management and maintenance in mind to discourage crime, fear of crime and anti-social behaviour:
- Incorporating natural surveillance and appropriate lighting; and
- Including, where necessary, well-designed security features.

HW1: Health and wellbeing (Strategic policy)

Applications for large scale residential development proposals will be accompanied by a proportionate Health Impact Assessment demonstrating how the proposal will:

- a. Promote community inclusion;
- b. Encourage healthy neighbourhoods;
- c. Promote active lifestyles;
- d. Have a positive impact on health and wellbeing; and
- e. Ensure public safety and minimise crime through appropriate design.

Where any potential adverse health and wellbeing impacts are identified, the applicant will be expected to demonstrate how these will be mitigated.

Contributions towards improved GP provision will be sought where necessary.

Development proposals for new healthcare facilities will be supported where they are easily accessible by public transport and link effectively to walking and cycling routes.

Development proposals for the multi-use and co-location of healthcare provision with other services and facilities to support the convenient coordination of local services will be supported.

Environmental quality, pollution and contaminated land

- 14.15 Development has the potential to result in pollution to air, water or land either through release of pollutants during demolition, construction or operation or by disturbance and mobilisation of historical contamination. Development can also be adversely affected by existing pollution. It is important to ensure that all development takes appropriate steps to minimise the risks of creating new sources of contamination and mitigates the risks from historical contamination where necessary. Development proposals must therefore consider the potential effects of pollution on human health and safety, the environment and the amenity of adjacent or nearby land users.
- 14.16 Environmental health legislation provides a means to regulate many forms of pollution should it arise, but it is clearly preferable to ensure new development is appropriate for its location and hence prevent conflict arising in the first place through appropriate planning decisions. Furthermore, planning can protect amenity which has more stringent requirements than can be pursued through environmental health legislation.
- 14.17 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 some of the major roads, highlighting the importance of continued monitoring to address previously unnoticed pollution levels. The City Council has produced an Air Quality Action Plan which proposes a series of measures to tackle these issues and development will need to ensure it supports and will not be detrimental to delivery of this plan. 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. Air pollution includes odour and both existing and potential new sources of odour (such as kitchen extraction systems) will be a material consideration when determining planning applications.
- 14.18 Exeter is crossed by a number of water courses and the area is also underlain by rock formations designated by the Environment Agency as principal and secondary aquifers. These aquifers contain potable groundwater which also flows into watercourses. Therefore there is the potential for development to affect the quality and quantity of water in rivers and aquifers and thus affect water dependant habitats and private water supplies. New development must not have an adverse impact upon water quality (for example by an increase in sewage effluent discharge) or water quantity (for example by preventing recharge to aquifers). The City Council will support initiatives that result in an improvement to water quality (as required by the Water Framework Directive). Policy CC9 also considers water quantity and quality.
- 14.19 Light and noise pollution arising from, 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. Inappropriate levels of noise can affect people's use and enjoyment of their homes, their ability to work or learn and their health.

- 14.20 Land contamination from former uses is also a key consideration as it has the potential to cause harm to the environment and public health and safety. Unless dealt with appropriately, it can inhibit the reuse of otherwise suitable sites and cause property blight. It is important that potential contamination is identified early to ensure that appropriate remediation measures are incorporated into the scheme. On this basis, a contaminated land risk assessment will be required for development proposals for sensitive uses such as housing where there is the potential for land contamination. 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 City 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.
- 14.21 The City Council encourages pre-application discussions where pollution is or might be an issue. All applications for development must contain sufficient information to enable the City Council to make a full assessment of potential pollution and hazards. Development proposals on land affected by contamination (or where there is reason to suspect contamination) must include an assessment of the extent of the contamination and any possible risks.
- 14.22 Prior to determination, developers need to demonstrate 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 that no unacceptable risks to human health or the environment will remain. This will need to involve adequate assessment by a competent person.
- 14.23 Activities (including 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 (CEMP). For certain types of development an Environmental Impact Assessment (EIA) will be required to ensure that the environmental impacts are comprehensively considered.
- 14.24 Policy HW2 requires development proposals to mitigate and reduce adverse pollution resulting from the construction and operational phases of development and to ensure contaminated land is suitable for the proposed use.

HW2: Environmental quality, pollution and contaminated land

All development proposals should be designed, constructed and operated to minimise and then mitigate, potential adverse impacts resulting from emissions and light, dust, vibration and noise pollution and where, possible contribute to the improvement of environmental conditions.

Development proposals will only be permitted where, individually and cumulatively, taking account of proposed mitigation and remediation there would be unacceptable impacts on:

- a. Environmental quality;
- b. Amenity;
- c. Air quality in and outside air quality management areas;
- d. Noise levels;
- e. Surface and ground water quality and quantity;
- f. Land and soil condition; and

g. The future operation of existing businesses or facilities.

Where development proposals require mitigation and remediation, applications will be accompanied by an appropriate monitoring framework.

Development proposals on land affected by contamination or pollution, or in areas affected by poor standards of amenity, will only be permitted where:

- a. The land is, or can be made suitable for, the proposed use; and
- b. It can be demonstrated that appropriate measures are in place to minimise and then mitigate any unacceptable adverse impacts on future occupants.



15. Infrastructure and facilities

Vision – A healthy and inclusive city

Addressing the provision of infrastructure and community facilities links to the 2040 vision to create a healthy and inclusive city. Ensuring development is located close to existing local services or delivers new facilities will support health and wellbeing and improve inclusivity.

Vision: World class education

Addressing the provision of schools as important local facilities links to the 2040 vision to create a city of accessible and world class education. This would cover all ages from early years to higher education and would also consider skills.

Vision - A leading sustainable city

Addressing the provision of infrastructure and community facilities links to the 2040 vision of Exeter as a leading sustainable city. The delivery of infrastructure in the right places at the right times helps to address our social, economic and environmental challenges and achieve our net zero ambitions.

Objective: Planning for new infrastructure and facilities at the right time and in the right places and protecting existing services that play an essential role in the lives of our residents and the success of the local economy

Introduction

- 15.1 Our communities rely on local infrastructure to live their everyday lives; transport infrastructure helps us to get around, doctors' surgeries and hospitals provide our healthcare, schools educate our young people, digital infrastructure helps us to communicate, green space and leisure facilities provide us with the opportunities to relax and utilities provide us with the water, power and communications we need.
- 15.2 The Exeter Plan is vital in identifying the infrastructure that we need, ensuring it is provided in the right way, at the right time and in the right place. Working with key infrastructure partners will be essential to ensure that infrastructure needs can be met in this way. The City Council will continue discussions relating to cross-boundary infrastructure provision in the context of the development planned in Exeter but also close to the city in East Devon and Teignbridge and also Mid Devon. Work with the other District Councils and Devon County Council will be particularly important here.

Infrastructure planning and delivery

15.3 To ensure that all new developments proposed within the Exeter Plan are delivered to a high standard, a wide and varied range of infrastructure will be required. It is essential that the infrastructure necessary to support development in the Exeter Plan is provided in an appropriately phased and timely manner, with appropriate funding mechanisms in place. An Infrastructure Delivery Plan lists the infrastructure required to go alongside the developments identified in the Plan.

- 15.4 The Exeter Plan and Infrastructure Delivery Plan have been developed through discussions with a number of key infrastructure providers/bodies. These include:
 - Exeter City Council:
 Green infrastructure, open space, leisure, sport, heritage assets, flood risk, energy, waste management.
 - Devon County Council:
 Transportation, education, youth, libraries, waste management, extra care housing, adult social care and children's services.
 - Highways England: Transportation.
 - Natural England: Habitats mitigation.
 - Environment Agency: Flood risk.
 - National Health Service via the Integrated Care Board: Health care
 - South West Water:
 Waste water treatment and water supply.
 - National Grid: Electricity supply and generation.
 - Devon and Cornwall Police: Police infrastructure.
 - The University of Exeter: Higher education
 - Exeter College:
 Wide range of education.
- 15.5 There have been particularly detailed discussions with Devon County Council regarding transportation and education. These discussions have taken account of the cross-boundary implications of development strategy and associated infrastructure requirements.
- 15.6 Looking at the full range of infrastructure, projects can be funded and delivered in a variety of ways. National policy requires that all new development addresses any anticipated impact on local infrastructure by either providing infrastructure as part of the development, through legal agreements (Section 106) requiring variable financial payments from the developer or via payment of a fixed Community Infrastructure Levy (CIL).
- 15.7 CIL operates through a locally-set series of rates for different uses based on floor space. The rates are calculated based on development viability and are fixed and non-negotiable (although there are exemptions for specified uses and in specific circumstances). CIL is generally collected in phases and is generally used to fund

more strategic infrastructure projects. Specified proportions of CIL receipts can also be used to fund more local neighbourhood projects in the area in which development takes place.

- 15.8 The City Council produces an Annual Infrastructure Funding Statement which sets out the general direction of travel for the types of projects which could be funded by CIL (without providing specific commitments). A review of the CIL rates in Exeter has been completed with the new rates being implemented in January 2024. This review of charges has ensured that development continues to be viable but also that CIL can still play an important role in funding infrastructure.
- 15.9 Section 106 Agreements are negotiated on a case-by-case basis for large development proposals and secure funding for infrastructure, community facilities and affordable housing directly related to the specific development. Section 106 Agreements are commonly used to provide funding to, or the direct provision of, affordable housing, local transport improvements, education projects, open space/green infrastructure, community facilities, flood risk mitigation and GP surgeries. Other provision can be made, for example for historic environment projects where there is a clear and robust evidence base, a direct link to development and where the requirements of national planning policy are met. It should be noted that all Section 106 Agreements are subject to viability considerations and so there is limit to the amount of funding which development can contribute. More information on this is provided later in this chapter of the Plan.
- 15.10 Key infrastructure can also be funded by grants or loans offered by the Government or directly by external organisations such as Devon County Council, utility companies, the Environment Agency, Homes England or National Highways and the Department for Transport. These arrangements are subject to external processes and decision-making and so collaboration is important to ensure that strategic infrastructure priorities are identified and funding opportunities maximised.
- 15.11 In many cases infrastructure will be funded through significant partnership working with funding coming from a variety of sources.
- 15.12 Policy IF1 sets out the approach to delivering new infrastructure in the city. An Infrastructure Delivery Plan accompanies the Exeter Plan. In addition, more detail about the specific infrastructure and community facilities required to go alongside the various development proposals is included in the allocation policies.

IF1: Delivery of infrastructure (Strategic policy)

Development proposals will be supported if accompanied by the delivery of an appropriate range of associated infrastructure and community facility requirements phased at the earliest practical and viable opportunity. Infrastructure phasing plans will be required for all large scale residential developments.

Funding will be sought through the Community Infrastructure Levy and Section 106 Agreements to ensure that the necessary infrastructure, facilities and services, including those identified in an Infrastructure Delivery Plan, are in place to support development.

Viability

- 15.13 In order to have an effective Plan it is important that its development proposals are viable. Viable means that development can be delivered meeting the planning requirements included in local policy and still allow a reasonable incentive for a landowner to sell, together with a suitable return to a developer. Paragraph 69 of the National Planning Policy Framework (NPPF) underlines the importance of viability where it makes reference to the need for plans to identify a sufficient series of sites according to their availability, suitability and likely economic viability.
- 15.14 Planning Practice Guidance identifies that viability appraisal for development proposals is an integral part of preparing a plan. A viability appraisal accompanies the Exeter Plan to ensure this is the case.
- 15.15 Policy IF2 explains the approach that will be taken to considering the viability of development. It has been developed in accordance with paragraph 58 of the NPPF; the assumption is that policy compliant development will be viable at planning application stage unless it can be demonstrated otherwise by the applicant through a thorough and publicly available viability assessment. It does however recognise that, after the adoption of the Exeter Plan, circumstances could change so significantly that viability may be affected, leading to potential discussions about whether development can afford to fund the infrastructure or affordable housing as required by Plan policies.
- 15.16 The policy indicates potential viability changes which may be a considered reasonable in discussions over what infrastructure and affordable housing could be provided by the development. Under these circumstances, a developer may submit a new assessment of development viability which indicates that a revised approach to the development of the site may be reasonable. This process will need to be carefully justified and comprehensive evidence of viability changes will need to be provided. The proposed viability review mechanism will help to deliver the policy requirements later in the Plan period even if they are not provided initially.

IF2: Viability (Strategic policy)

To ensure that development provides the necessary policy requirements, affordable housing and infrastructure to create and maintain sustainable communities, deviation from policy on the grounds of viability will only be considered appropriate where one or more of the following have occurred to a significant degree following the adoption of the Exeter Plan:

- a. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the Exeter Plan's adoption;
- b. Adverse changes in building costs relative to sales values; and
- c. Worsening of local market conditions caused by a recession or an extraordinary event demonstrably affecting incomes and development values.

A viability appraisal will need to be submitted explaining the circumstances which have led to the changes in viability since the Exeter Plan's adoption. Any variation from the proposed policy and affordable housing requirements, and deviation from the assumption that required infrastructure will be funded by development, will need to be justified robustly.

The City Council will recover from applicants their reasonable costs associated with an independent assessment of submitted viability appraisals where a deviation from policy

requirements is sought. The submitted viability appraisal and the independent review will be published by the City Council with the planning application documentation.

Where policy compliant infrastructure requirements and/or contributions are not provided due to an agreed viability reason, the viability of the proposal will be reviewed every three years in accordance with the requirements of this policy to seek to achieve full policy compliance in later development phases.

Community facilities

- 15.17 The NPPF requires, at paragraph 97, that policies should plan positively for provision of shared spaces, community facilities and other local services to enhance the sustainability of communities. The NPPF then goes further by clearly setting out that, generally, open space, sports and recreational buildings and land, including playing fields should not be built on unless a series of key criteria are met. This section of the Plan focuses on built community facilities; open space, play areas, allotments and sport are included in the next section of the Plan.
- 15.18 Exeter has a wealth of services and facilities that are essential for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, healthcare, community halls, places of worship, libraries, space for children's services/community use and youth clubs. The protection of these facilities is of critical importance to our residents.
- 15.19 The planning system has an important role to play in the protection of existing community facilities. Policy IF3 clearly sets out the expectation that facilities will be protected unless a number of criteria can be met regarding the suitability, viability, condition and requirement for the facility. Robust evidence will be required to justify any potential loss of provision.
- 15.20 It is notable that community facilities are often provided by the private sector and so the ongoing viability of a community facility as business can be an important consideration. Where relevant, applications which would result in the loss of a privately run business serving an important community function (e.g. a pub) will be expected to be supported by evidence which demonstrates that the existing facility is no longer viable and that the sale of the business has been marketed for a period of 12 months in advance of the submission of the planning application. This condition only applies to specific privately run businesses and does not apply to other facilities which are publicly run.
- 15.21 Outside of the planning regime, the assets of community value (ACV) process allows communities to specifically identify and nominate buildings or other assets which are of particular importance to furthering the social wellbeing or social interests of their local area. Once a nomination is successful, the community would then be notified and have the option to bid on the asset should it ever be listed for sale. Exeter has a list of assets of community value which is kept up to date and published online.
- 15.22 Alongside protecting existing assets, providing new facilities with development will be key to creating a successful, liveable city and making sure that development has a positive impact. Working with our partners will be central to ensuring that essential infrastructure and facilities are provided. Strategic community facilities will be generally most appropriately located in the city centre or in locations which are

- accessible by sustainable travel. Smaller facilities which provide local services will be located in, or close to, the neighbourhood and local centres.
- 15.23 The City Council will support proposals which make efficient use of community facilities through the sharing of provision between complementary uses. This will help to make better use of existing resources contributing to sustainable development. As an example, and where appropriate, the practice of making school sports and other education facilities available to wider community use is already well established. There are further opportunities to extend this principle in accordance with Sport England guidance.
- 15.24 Education is a particularly important form of community facility. The City Council recognises the importance of education provision for the young people of Exeter. Not only does education provide children and young people with the knowledge and skills they require to live fulfilled and productive lives, education helps to reduce inequalities, creates supportive communities and has an important role in placemaking. On this basis, the City Council understands the impacts which development can have on education provision and the associated requirements for expansion or new schools. The City Council therefore supports the principle of development providing early years, primary, secondary and provision for children with Special Educational Needs and Disabilities (SEND) through Section 106 Agreement contributions as may be required. The City Council will work with Devon County Council on planning and delivering appropriate education provision making reference to the County Council's Education Infrastructure Plan and Education Infrastructure Section 106 Approach and the Department for Education Guidance on Securing Developer Contributions for Education as considered appropriate.
- 15.25 Additional early years, primary, secondary and special education provision will be required during the plan period, including a new primary school at Water Lane.
- 15.26 Policy IF3 sets out the approach for the protection of existing, and delivery of new, community facilities in the city.

IF3: Community facilities (Strategic policy)

Existing facilities, including buildings and land, that meet community, social, health, welfare, education, spiritual, cultural, leisure and recreational needs (including assets of community value) will be protected, unless it can be demonstrated that:

- a. They are no longer fit for purpose; or
- b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or
- c. They are surplus to requirements; or
- d. There are alternative, appropriate facilities in the area to meet community needs;

and

e. Sufficient alternative or improved provision is to be made in a suitable location to serve the local community which clearly outweighs the loss.

Development proposals for change of use from a business that serves a community function may be supported if the use is no longer viable and there is no reasonable prospect of the site being used for a community use in the future.

Development proposals for new or improved community facilities will be supported. Ongoing engagement in the development process should take place with local communities to ensure that needs are understood, planned for and met.

Facilities that serve the city as a whole should be located in the city centre or, if this is not practical, at locations which are accessible by active travel and public transport.

Facilities which serve neighbourhood needs should be located within or close to district or local centres or at locations which are accessible to the local community by active travel.

Contributions towards additional or improved education provision and other community facilities will be sought from residential development proposals where necessary.

Open space, sport, play areas and allotments

- 15.27 Access to high quality open space including opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities. The city's existing sport, 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 section of the Plan covers the full range of open space and sport (both built facilities and playing pitches) provision in Exeter.
- 15.28 Amongst the current accessible green space in Exeter, there are 14 formal parks, a range of playing fields, 26 allotment sites (approximately 1500 plots) and 25 hectares of accessible woodland. When the Valley Parks are taken into consideration, public green space makes up nearly 10% of the total area of the city. However, significant value also lies in the wealth of smaller parks and open spaces that are used on a more local basis for recreation, play and exercise, contributing to the resilience of communities.

Open space

- 15.29 There is a range of open space across the city providing for local communities maintained by the City Council. This includes:
 - Parks and gardens;
 - Informal green space; and
 - Natural and semi natural space.
- 15.30 Depending on the amount, condition and location of existing open space, residential development may generate a need for more in proportion to the scale of development. The latest Fields in Trust guidelines for open space (Guidance For Outdoor Sport And Play, England (2020)) are widely acknowledged as the primary source of guidance regarding outdoor space provision by national and local government and so will be used to inform assessments of additional open space requirements. Needs should be discussed, assessed and evidenced in discussion with the City Council. It is important to ensure that open space is located in easily

accessible locations and designed to be meet the accessibility requirements of the community as a whole, regardless of age, disability or background.

Play areas

- 15.31 The ability and opportunity to play outside is something that is often taken for granted. Yet, for many people, those opportunities are limited. The City Council recognises the importance of active recreation in a safe environment to help tackle childhood obesity and improve overall health and wellbeing. On this basis, there are a range of play areas across the city.
- 15.32 Play areas can be defined according to their size/the amount of space provided and the walking distance from housing (effectively the size of the area served). The different forms of play area are set out below, from small to large:
 - Local area for play (LAP);
 - Locally equipped area for play (LEAP);
 - Neighbourhood equipped area for play (NEAP); and
 - Multi-use games area (MUGA).
- 15.33 The majority of play areas and green space for informal play are under the City Council's control however some new housing developments install and maintain play areas under a private management agreement. Over the last 30 years the number of play areas within the city has almost doubled.
- 15.34 To assess the play area requirements of new development the City Council will be informed by the Fields in Trust guidelines. The City Council approach going forward focuses on improving the quality of existing play areas in the city. On this basis, if a play area already exists within reasonable walking distance of a development, contributions may be sought to improve the capacity and quality of the existing provision. Where there is no existing play area within reasonable walking distance a new play area may be required. New play areas will need to be operated and maintained by a management company.

Allotments

- 15.35 The City Council manages approximately 1500 individual allotment plots over 26 sites. Sites across the city are at full capacity and the waiting lists for allotment plots are extensive (over 800 as of 2023), leaving most waiting some time to secure a plot. A priority for the City Council over the next 20 years will be to ensure that new allotments are provided at a level proportionate to additional demand. This is especially important given that the strategic mixed use brownfield developments allocated in this Plan will be higher density which could have an impact on the amount of private outdoor space.
- 15.36 The Fields in Trust guidance for provision of new open space does not cover provision for new allotment space. As such, standards recommended by the National Allotment Society will be applied. Given the management and space implications of providing new allotments, off-site financial contributions are the most feasible means of meeting these requirements. An additional allotment site is identified off Shillingford Road on the edge of Alphington. This has been identified for some time since the South West Exeter Development Framework. Some small scale, modest enabling development may be appropriate on a part of this site if it were to support delivery of allotments here.

Sports facilities

- 15.37 The City Council has a robust Playing Pitch Strategy (PPS) produced alongside Sport England with significant input from key stakeholders and governing bodies from the sports sector. The PPS considers the facility needs for pitch sports and tennis in Exeter over the period to 2040 taking into account the housing growth of the city. The PPS identifies a series of potential future projects including grass pitches, artificial pitches, tennis courts and community hubs.
- 15.38 To sit alongside the PPS the City Council is also working on a Built Facilities Strategy to consider the current and future need for sports halls and swimming pools. In terms of pitches, tennis courts, hubs and built sports facilities, there may be cross-boundary impacts on Exeter's sports facilities from development outside the city boundary. The City Council will work with neighbouring Councils to consider these potential impacts. Funding may be required from development outside of Exeter to mitigate potential impacts.
- 15.39 New developments will need to consider both the PPS and the Built Facilities Strategy to inform requirements associated with development and the City Council will request financial contributions accordingly.

IF4: Open space, play areas, allotments and sport

Existing open space, play areas, local green spaces, allotments, playing pitches and sports facilities will be protected unless it can be robustly demonstrated that:

- a. They are no longer fit for purpose; or
- b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or
- c. They are surplus to requirements; or
- d. There are alternative appropriate facilities in the area to meet community needs;

and

e. Sufficient alternative or improved provision is to be made in a suitable location to serve the local community which clearly outweighs the loss.

Residential development proposals will be required to provide, or make contributions to, a range of sports facilities, playing pitches, play areas, open space and allotments (including ongoing management and maintenance) to meet technical standards in accordance with an appropriate City Council needs assessment and the relevant adopted Supplementary Planning Documents or their successors.

Development proposals for new open space, play areas, local green spaces, allotments, playing pitches and sports facilities will be supported where they are:

- a. Located and designed to be inclusive and accessible to all, regardless of age, ability, or background;
- b. Integrated into the local active travel network; and
- c. Designed to be safe and secure.

New cemetery provision

15.40 The City Council currently operates three cemeteries in the city.

Higher Cemetery, Heavitree: 15.0 hectares
Exwick: 6.4 hectares
Topsham: 2.1 hectares

- 15.41 Analysis shows that each of these sites is nearing capacity. To avoid a disruption in burial services, new provision or a new cemetery site will be required during the Plan period.
- 15.42 Advice from the Environment Agency and Devon County Council is an important consideration regarding appropriate locations for new cemeteries as a result of potential impacts on water bodies. Cemeteries must not pollute groundwater or surface water and therefore the Environment Agency will normally object to the locating of any new cemetery or the extension of any existing cemetery within Groundwater Source Protection Zone 1, or within 250 metres from a well, borehole or spring used to supply water that is used for human consumption, whichever is the greater distance.
- 15.43 The Environment Agency will apply a risk-based approach to assessing the suitability of sites for cemeteries outside of the zones noted above. A high priority is placed on protecting groundwater within principal aquifers and groundwater catchments used for drinking water supply. To manage the pollution risks caused by the burial of human remains, some higher risk cemeteries must operate under an environmental permit.
- 15.44 Due to the challenges in finding suitable land within existing parts of the city, a series of criteria are set out in Policy IF5 to allow for sites to come forward in areas that may otherwise be unsuitable for built development, including within areas of high landscape sensitivity and the Valley Parks.

IF5: New cemetery provision

Proposals for cemetery provision will be supported where they:

- Do not have an unacceptable impact on landscape sensitivity, biodiversity or heritage assets including archaeology;
- b. Are located outside areas at high risk of flooding;
- c. Are located outside Groundwater Protection Zones;
- d. Are located outside areas of contaminated land or historic landfill; and
- e. Do not result in the loss of public access, open space or areas of recreation.

16. Site allocations

Introduction

- 16.1 The Exeter Plan allocates a series of sites for development between 2021 and 2041. The site allocations (included in Policies H2 and EJ6) have been selected in accordance with the spatial strategy for the city set out in Policy S1. The site allocations are shown on a map on the next page.
- 16.2 The City Council has identified the allocations after an assessment process that considered these and other sites across the city. The assessment, which is contained in the Exeter Housing and Economic Land Availability Assessment Third Edition (HELAA), looked at:
 - Physical constraints such as access, flood risk, topography, ecology, heritage, health and safety issues, contamination, proximity to services, potential infrastructure requirements, ecology, landscape and the presence of trees and hedgerows;
 - The availability of land for development; and
 - The presence of legal covenants or multiple ownership arrangements that could make the development so complex as to become unachievable.

Strategic mixed use brownfield allocations

- 16.3 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located close to the city centre or key public transport hubs. The sites are identified in Policy H2 and were part of the original Liveable Exeter work. The City Council intends that these sites are redeveloped to provide high quality, mixed use neighbourhoods at optimal densities that minimise the need to travel and maximise active travel and opportunities to use public transport. The five sites will make a significant contribution towards meeting our housing requirement and economic growth ambitions.
- 16.4 These sites will be central to achieving the spatial strategy for the city. The Liveable Exeter principles included in Policy S2 will apply to these sites.
- 16.5 All of these sites are included on the Policies Map and are covered by site specific allocation policies setting out the key requirements for development.
- 16.6 Requirements set out in the allocation policies have been developed using the site assessment work, discussion with promoters, from elements of site-specific evidence, from thematic evidence and following infrastructure planning work.

Residential allocations

16.7 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2. These make up the balance of our housing requirement and provide for choice and competition in the market. The majority of the sites are brownfield in line with the spatial strategy. Some of the sites are greenfield, these sites helping to provide a mix of development opportunities to enable housing

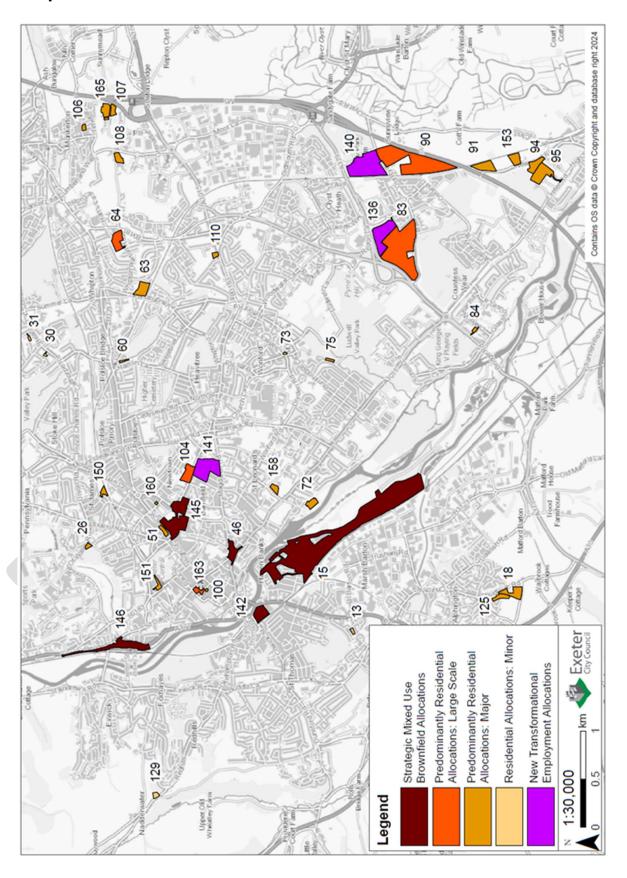
- delivery throughout the Plan period. Some of the smaller brownfield sites are owned by the City Council. Others are owned by other individuals and organisations.
- 16.8 The residential site allocations are included on the Policies Map but are not covered by individual allocation policies either due to their smaller scale and/or because they are identified for a more limited variety of uses.

Employment allocations

- 16.9 In addition to the strategic mixed use brownfield allocations and the residential allocations, three employment sites are allocated in Policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.
- 16.10 These sites have also been assessed in the HELAA, using a consistent methodology with the Exeter Employment Study and Economic Development Needs Assessment.

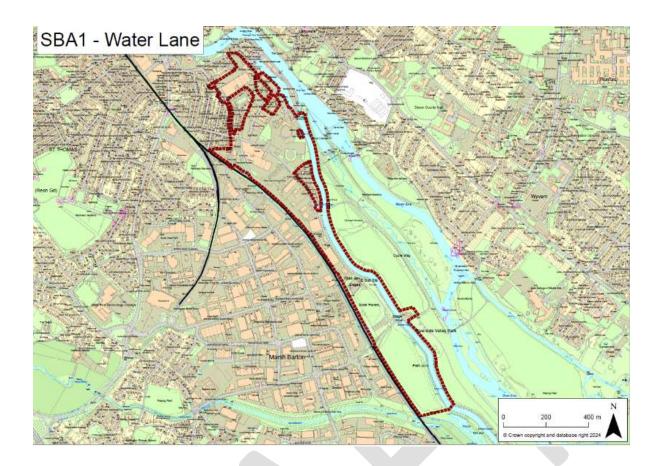


Map of allocations



Strategic mixed use brownfield allocation: SBA1 - Water Lane

- 16.11 Water Lane is the largest strategic mixed use brownfield site allocated in the Exeter Plan and is located between the Exeter Ship Canal and the Great Western main line railway. The site is predominantly brownfield and currently contains a variety of uses including business premises and workshops, utilities infrastructure, public car, coach and boat parking, leisure and community facilities including for water based activities and Grace Road Field (now disused as a playing field).
- 16.12 The majority of the Water Lane allocation was identified for mixed use, residential-led redevelopment in the Exeter Local Plan First Review. The site is also included in the Liveable Exeter initiative. Water Lane provides a great opportunity to deliver a high quality, low-car new neighbourhood that is well served by a primary school, other community, recreational, cultural and sustainable travel facilities (including the new Marsh Barton railway station), has good access to employment and links effectively to the Riverside Valley Park. Development will need to respond to challenges such as flood risk, access, contamination, gas and electricity infrastructure, safeguarding the function of nearby waste operations and protecting the amenity of nearby residents. It will also need to reflect the site's rich industrial and water related heritage. In respect of the flood risk challenge, all development at Water Lane will need to contribute towards the provision of a safe and strategic access and egress route.
- 16.13 The site allocation is supported by the Liveable Water Lane Supplementary Planning Document (SPD) which was adopted by the City Council in July 2024 following community engagement and subsequent statutory public consultation. Recognising that Water Lane is a flagship allocation for the city, the SPD contains a development framework and design code for the site alongside strategies for access and utilities provision, to help ensure that Water Lane is redeveloped in a comprehensive, coordinated way and at a high quality which reflects the Liveable Exeter principles.
- 16.14 The site is currently in multiple ownerships, including areas owned by the City Council. 341 of the total homes identified at Water Lane already benefit from a resolution to approve planning consent, subject to the completion of a Section 106 Agreement (under planning application reference 22/1145/FUL). An outline planning application for mixed use redevelopment of another part of the site is pending consideration.
- 16.15 Consultation with the local community will be required before the submission of planning applications, in accordance with relevant codes in the Liveable Water Lane SPD.



Strategic mixed use brownfield allocation: SBA1 - Water Lane (Strategic policy)

A site of 36.2 hectares at Water Lane is identified for a mixed use development delivering approximately 1,861 homes and the retention of existing levels of employment floorspace in phases up to 2041. The development must support the achievement of net zero and accord with the Liveable Exeter Principles and the Liveable Water Lane Supplementary Planning Document to deliver a compact and well connected neighbourhood, incorporating the highest standards of design.

The following will be required:

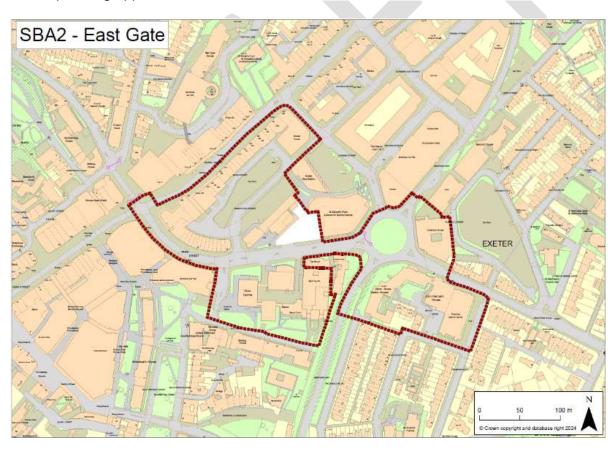
- A. A housing mix informed by the most up to date Exeter Local Housing Needs
 Assessment and built to optimal densities in accordance with Policy H15, which meets a
 wide range of housing needs including:
- i. Affordable housing in accordance with Policies H4, H5 and H6 as relevant;
- ii. Serviced plots for custom and self-build homes in accordance with Policy H7;
- iii. Accessible homes in accordance with Policy H14; and
- iv. A 70 unit extra care housing scheme.
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes, together with maritime sectors.
- C. A locally accessible neighbourhood centre including:
- i. Public realm that includes a community green space and provides space for community and cultural activities;

- ii. A community building with hall, meeting rooms and flexible space for uses including potential library provision, youth, children's and adult's services, other community uses and cultural activities:
- iii. A new surgery providing GP, pharmacy and other community healthcare or contributions to GP provision;
- iv. Retail or commercial units with active ground floors accommodating local shops and services:
- v. A work hub;
- vi. A primary mobility hub; and
- vii. A two form entry primary school including early years and communal space for a family hub and contributions to secondary and special educational needs provision.
- D. Protection and enhancement of existing community and sports facilities in accordance with Policies IF3 and IF4, including the creation of Clapperbrook Hub at Bromham's Farm, provision of additional space for water related activities and safeguarding of the infrastructure needed to support strategic water related uses.
- E. Transport infrastructure to deliver a low-car development:
- i. A layout that accords with active design principles, with Water Lane providing an active travel spine connecting Haven Banks with the neighbourhood centre and Marsh Barton Station, improved active travel routes along the Canal frontage, a new neighbourhood street connecting Water Lane and the neighbourhood centre with the Canal, the transformation of Haven Road to an active travel priority street and frequent, active green streets and lanes running towards the River Exe;
- ii. A layout that allows for access by emergency service and delivery vehicles and the provision of a bus service through the site, including a safeguarded bus route between Gabriel's Wharf and Marsh Barton Train Station;
- iii. A layout and design that takes account of the need of people with disabilities;
- iv. Mobility hubs to provide for active travel, shared mobility, public transport, electric vehicle charging and deliveries;
- v. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;
- vi. Delivery of, or contributions to, a new active travel crossing of the Canal that ensures its continued navigation function;
- vii. Provision of infrastructure for and contributions to public transport;
- viii. The provision of improved active travel and public transport access at Tan Lane under the Great Western main line towards Marsh Barton;
- ix. Electric vehicle charging points throughout the site; and
- x. An indicative average ratio of 1:5 car parking spaces to homes, with additional spaces provided for blue badge holders, servicing and car clubs in predominantly car free areas and a site wide strategy that allows for levels of car parking to reduce below the average over time.
- F. Enhancement of the natural environment and green infrastructure:
- i. Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
- ii. A mix of open space provision including for sport and recreation;

- iii. High quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park:
- iv. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and
- v. Biodiversity enhancements and mitigation of impacts on priority habitats, including open mosaic habitats.
- G. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- H. Appropriate measures to respond to, and ensure the continued operation of, the gas and electricity infrastructure network across the site.
- I. Appropriate flood risk mitigation:
- i. A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources;
- ii. Sustainable Urban Drainage to mitigate against flood risk; and
- iii. Delivery of, or contributions to, an emergency access and egress route.
- J. Conservation and enhancement of the historic environment:
- i. A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;
- ii. A built form that enhances the character and appearance of the Riverside Conservation Area and protects the settings of all Listed Buildings including the Cathedral, Quay House, Customs House, Wharfinger's House and the attached Warehouse (grade I) and Colleton Crescent, Colleton Villa, the Harbourmaster's Office, Fish Market and the Warehouse Vaults (grade II*); and
- iii. Enhancement of the Canal, with key buildings, materials and industrial structures including the Gas Works Former Manager's House retained and reused creatively to support a distinct character rooted in the area's history.
- K. Measures to support the continued operation of existing waste operations close to the site.
- L. Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed used.

Strategic mixed use brownfield allocation: SBA2 - East Gate

- 16.16 East Gate is located on the edge of the city centre, stretching from Sidwell Street, to Cheeke Street, Paris Street and the end of Heavitree Road. It currently contains a variety of uses including office, business and retail, residential, public car parking, the former bus station and former Pyramids Leisure Centre.
- 16.17 East Gate provides a great opportunity to regenerate a tired area of the city into a high quality, low or no-car new neighbourhood that is well served by the wide range of services, employment and facilities offered by its central location. Development will need to respond to challenges such as heritage and key views, protecting the amenity of nearby residents and ensuring sufficient provision of a mix of uses on the site.
- 16.18 The site is currently in multiple ownerships, although large parts of the site are owned by the City Council, including along Sidwell Street and Paris Street. The area includes the large regeneration scheme known as City Point around the former bus station.
- 16.19 Consultation with the local community will be required before the submission of planning applications.



Strategic mixed use brownfield allocation: SBA2 - East Gate (Strategic policy)

A site of 6.1 hectares at East Gate is identified for a mixed use development delivering approximately 609 homes, employment, education/training space and an impressive and memorable city centre gateway. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well connected neighbourhood, incorporating the highest standards of design.

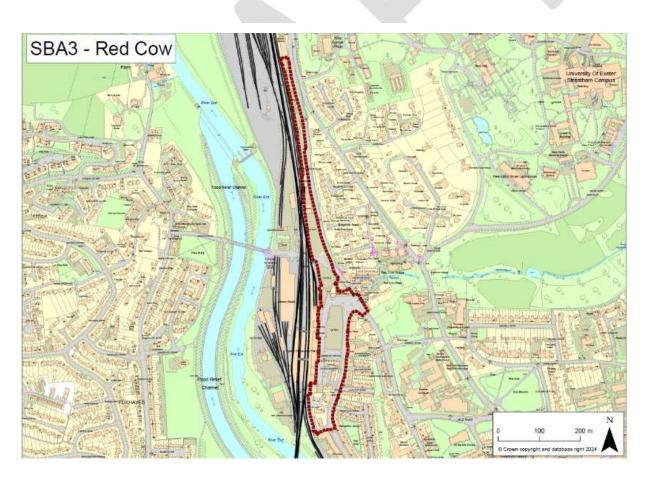
The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs
 Assessment and built to optimal densities in accordance with Policy H15, which meets a
 wide range of housing needs including:
- i. Affordable homes in accordance with Policies H4, H5 or H6 as relevant;
- ii. Serviced plots for custom and self-build homes in accordance with Policy H7; and
- iii. Accessible homes in accordance with Policy H14.
- B. A mix of employment provision including office space, work hubs, collaborative workspace and live-work schemes.
- C. Social, community and cultural infrastructure including:
- i. Public realm that provides space for community and cultural activities;
- ii. Retail or commercial units;
- iii. Potential space for education/training provision/an innovation hub;
- iv. Contributions to early years, primary, secondary and special educational needs provision; and
- v. Contributions to GP provision.
- D. Transport infrastructure to deliver a low-car development:
- i. A layout in accordance with active design principles comprising a dense network of active travel routes which link to the existing routes in the area including via improved crossings of Western Way, Paris Street, Heavitree Road and Cheeke Street;
- ii. A layout and design that takes account of the needs of people with disabilities;
- iii. A mobility hub to provide for public transport, active travel and shared mobility;
- iv. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;
- v. Provision of infrastructure for, and contributions to, public transport;
- vi. Electric vehicle charging points throughout the site; and
- vii. Access arrangements for service and emergency vehicles.
- E. Enhancement of the natural environment and green infrastructure:
- i. Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
- ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and
- iii. Biodiversity enhancements.

- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
- i. A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources; and
- ii. Sustainable Urban Drainage to mitigate against flood risk.
- H. Conservation and enhancement of the historic environment:
- i. A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation; and
- I. A built form that enhances the character and appearance of the Southernhay and The Friars and the Lower Summerlands Conservation Areas and protects the settings of all Listed Buildings including the Cathedral (grade I), Sidwell Street Methodist Church and 13-15 Dix's Field (grade II*) and those along Heavitree Road, others at Dix's Field and Southernhay Congregational Church (grade II). Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed use.

Strategic mixed use brownfield allocation: SBA3 - Red Cow

- 16.20 Red Cow is a strategic mixed use brownfield allocation located in the area of St David's railway station. Cowley Bridge Road and Bonhay Road run along the eastern boundary and the platforms and railway lines of St David's station lie to the west. The site currently contains the area outside the station, surface car parks, storage and industrial uses, purpose built student accommodation and shops.
- 16.21 Part of the site was allocated for mixed use redevelopment in the Exeter Local Plan First Review. The site is also included in the Liveable Exeter initiative.
- 16.22 Red Cow offers the opportunity to deliver an impressive and memorable city gateway, creating a sense of arrival into Exeter. As a strategic transport hub, the site is well suited to deliver a low carbon, low-car neighbourhood that optimises density. In order to deliver the high quality gateway envisaged, landowners, the City Council and other interested parties will need to work in close partnership. The development must meet St David's railway station's operational needs (including the provision of car parking), as well as responding to challenges such as flood risk, contamination and protecting of the amenities of nearby residents.
- 16.23 Consultation with the local community will be required before the submission of planning applications.



Strategic mixed use brownfield allocation: SBA3 - Red Cow (Strategic policy)

A site of 3.8 hectares at Red Cow is identified for a residential led mixed use development delivering approximately 442 homes, retaining existing levels of employment floorspace, and delivering an impressive and memorable city gateway that creates a sense of arrival into Exeter as well as meeting St David's railway station's operational needs. The development must support the achievement of net zero and accord with the Liveable Exeter Principles, incorporating the highest standards of design and delivering a place people will visit, stay, work and live.

The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs Assessment and built to optimal densities in accordance with Policy H15, which meets a wide range of housing needs including:
- i. Affordable homes in accordance with Policies H4, H5 or H6 as relevant;
- ii. Serviced plots for custom and self-build homes in accordance with Policy H7; and
- iii. Accessible homes in accordance with Policy H14.
- B. A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes.
- C. Social, community and cultural infrastructure including:
- i. Public realm that provides space for community and cultural activities;
- ii. Retail or commercial units;
- iii. Contributions to early years, primary, secondary and special educational needs provision; and
- iv. Contributions to GP provision.
- D. Transport infrastructure to deliver a low-car development:
- i. A transport interchange/mobility hub for public transport, active travel and shared mobility;
- ii. A layout in accordance with active design principles comprising active travel routes to provide access to and from St David's station and linking to the existing routes in the area including routes along the River Exe;
- iii. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;
- iv. Provision of infrastructure for, and contributions to, public transport; and
- v. Electric vehicle charging points throughout the site.
- E. Enhancement of the natural environment and green infrastructure:
- i. Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
- Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and
- iii. Biodiversity enhancements.

- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
- A layout informed by a detailed flood risk assessment which addresses flood risk from all sources, including the Taddiforde Brook;
- ii. Sustainable Urban Drainage to mitigate against flood risk; and
- iii. Delivery of, or contributions to, an emergency access and egress route.
- H. Conservation and enhancement of the historic environment:
- i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and
- ii. A built form that enhances the character and appearance of St David's Conservation Area and retains sight lines of locally listed St David's station.

Strategic mixed use brownfield allocation: SBA4 - Exe Bridges Retail Park

- 16.24 Exe Bridges Retail Park is a strategic mixed use brownfield allocation fairly centrally located in Exeter, south of the River Exe and adjacent to the Exe Bridges highway crossings of the river. St Thomas is south and south east of the site, whilst the Riverside Leisure Centre and Great Western main line are adjacent. Currently the site is occupied by a retail park and associated parking.
- 16.25 The site provides an opportunity to redevelop the area for housing whilst retaining significant retail provision in a mixed use proposal. Development in this area would benefit from a fairly central location with the city centre and St Thomas providing a full range of local facilities without the need to travel. The site also benefits from high quality transport links, particularly from railway services and the strategic cycle links along the River Exe.
- 16.26 The site is currently subject to various leases which mean that development here is unlikely to take place until the second half of the Plan period, beyond 2030. This provides time for more detailed site proposals to come forward alongside the necessary infrastructure.
- 16.27 Key considerations at Exe Bridges Retail Park will be the need to maintain the retail function of the site on the ground floor (the site is within the St Thomas district centre) whilst providing significant, high quality residential development above. This will help to manage the impacts of flood risk which are a vital issue for the site, alongside future access and egress requirements. Ensuring an appropriate form of development to complement the local Conservation Area and manage impacts on the Old Exe Bridge will also be important considerations.
- 16.28 Consultation with the local community will be required before the submission of planning applications.



Strategic mixed use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic policy)

A site of 1.8 hectares at Exe Bridges Retail Park is identified for a mixed use development delivering approximately 201 homes, retail and an attractive public realm. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs Assessment and built to optimal densities in accordance with Policy H15, which meets a wide range of housing needs including:
- i. Affordable homes in accordance with Policies H4, H5 or H6 as relevant;
- ii. Serviced plots for custom and self-build homes in accordance with Policy H7; and
- iii. Accessible homes in accordance with Policy H14.
- B. Retail or commercial units with active ground floors accommodating shops and services.
- C. New employment provision in the form of a collaborative workspace.
- D. Social, community and cultural infrastructure including:
- i. Public realm that provides space for community and cultural activities;

- ii. Contributions to early years, primary, secondary and special educational needs provision; and
- iii. Contributions to GP provision.
- E. Transport infrastructure to deliver:
- A layout in accordance with active design principles comprising a dense network of active travel routes which link to the existing routes in the area and improve crossings of Cowick Street and Alphington Street;
- ii. A layout and design that takes account of the needs of people with disabilities;
- iii. A mobility hub to provide for public transport, active travel and shared mobility;
- iv. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;
- v. Provision of infrastructure for, and contributions to, public transport;
- vi. Electric vehicle charging points throughout the site;
- vii. Appropriate levels of parking to support retail provision and deliver low-car residential development; and
- viii. Access arrangements for service and emergency vehicles.
- F. Enhancement of the natural environment and green infrastructure:
- Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;
- ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and
- iii. Biodiversity enhancements.
- G. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- H. Appropriate flood risk mitigation:
- i. A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources;
- ii. Sustainable Urban Drainage to mitigate against flood risk; and
- iii. Delivery of, or contributions to, an emergency access and egress route.
- I. Conservation and enhancement of the historic environment:
- i. A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation; and
- ii. A built form that enhances the character and appearance of the Cowick Street and Riverside Conservation Areas and protects the settings of all Listed Buildings including St Thomas Railway Station (grade II) and the Old Exe Bridge Scheduled Monument.
- J. Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed use.

Strategic mixed use brownfield allocation: SBA5 - South Gate

- 16.29 South Gate is located on the edge of the city centre and is currently dominated by the highway gyratory at the southern end of South Street and western end of Holloway Street (known as the Acorn gyratory). The site includes the Magdalen Street car park, a shelter for rough sleepers and a large area of road and associated infrastructure.
- 16.30 The site provides a great opportunity to significantly enhance the appearance of this key gateway to the city centre, improve active travel links between the city centre and the quayside, conserve and enhance heritage assets including the City Walls, nearby Listed Buildings and the Conservation Areas and deliver a significant number of new homes. Development in this location would significantly improve the efficiency of the use of land in an area which has excellent access to a range of facilities, jobs and shops.
- 16.31 Other key considerations will be the loss of a public car park on site and the need to provide a suitable replacement for the rough sleepers' shelter, significantly realign the highway gyratory and take account of the utilities and potential archaeology present in the area.
- 16.32 The site is currently largely owned by Devon County Council, either as a car park or as highway land, while the City Council has a lease on the public car park. Additional development feasibility work is being organised by the City Council working with Devon County Council. Consultation with the local community will be required before the submission of planning applications.



Strategic mixed use brownfield allocation: SBA5 - South Gate (Strategic policy)

A site of 1.5 hectares at South Gate is identified for a mixed use development delivering approximately 81 homes and provision of some small scale employment, creating an impressive and memorable city centre gateway. The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs
 Assessment and built to optimal densities in accordance with Policy H15, which meets a
 wide range of housing needs including:
- i. Affordable homes in accordance with Policies H4, H5 or H6 as relevant;
- ii. Serviced plots for custom and self-build homes in accordance with Policy H7;
- iii. Accessible homes in accordance with Policy H14; and
- iv. Re-provision, either onsite or off site, of appropriate accommodation for rough sleepers.
- B. New employment provision in the form of a collaborative workspace.
- C. Social, community and cultural infrastructure including:
- i. Public realm providing space for community and cultural activities;
- ii. Contributions to early years, primary, secondary and special educational needs provision; and
- iii. Contributions to GP provision.
- D. Transport infrastructure to deliver car-free development:
- A layout and design in accordance with active design principles comprising a dense network of active travel routes which link to the existing routes in the area and takes account of the needs of people with disabilities;
- ii. Alterations to the highway layout that improve active travel routes between the city centre and the quayside;
- iii. A mobility hub to provide for public transport, active travel and shared mobility;
- iv. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling and Walking Infrastructure Plan;
- v. Provision of infrastructure for, and contributions to, public transport;
- vi. Car parking spaces reserved for blue badge holders; and
- vii. Access arrangements for service and emergency vehicles.
- E. Enhancement of the natural environment and green infrastructure:
- i. Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision
- Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and
- iii. Biodiversity enhancements.

- F. An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.
- G. Appropriate flood risk mitigation:
- A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources; and
- ii. Sustainable Urban Drainage to mitigate against flood risk.
- H. Conservation and enhancement of the historic environment:
- i. A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;
- ii. A built form that enhances the character and appearance of the Southernhay and the Friars and the Central Conservation Areas and protects the settings of the City Walls and all Listed buildings including the Cathedral and George's Chapel (grade I), Wynard's Hospital (grade II*), the Hotel Du Vin, the Gateway to Palmer's Almshouses, 45, 46, 49, 50 and 63 to 66 Magdalen Streeted), the White Ensign Club, 71 to 75 Holloway Street (grade II) and other Listed Buildings in surrounding streets; and
- iii. Contributions towards the repair, maintenance and enhancement of the Exeter City Walls where appropriate.
- I. Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed use.

Topsham infrastructure: TI1: Topsham Infrastructure Delivery Framework

- 16.33 The Exeter Plan includes four allocations in Topsham. These are located amongst other sites that either already have planning consent or are being developed.
- 16.34 Alongside the four allocations in Topsham, East Devon District Council are looking to identify a large scale, mixed use allocation next to the M5 motorway and north of Topsham in their Draft Local Plan. This allocation links closely to the four sites in Exeter. The East Devon site could accommodate around five hundred homes, a new primary school, community facilities and green infrastructure, alongside appropriate transport infrastructure.
- 16.35 A wider approach to comprehensively plan for the allocations on a cross-boundary basis is required because development in the East Devon allocation could impact on facilities and services in Topsham and Exeter. There are also opportunities for residents in Topsham to benefit from new community provision in the East Devon allocation. For example, the allocation's primary school could provide places for children in the Exeter administrative area.
- 16.36 Discussions between the City Council and East Devon District Council have taken place. These have set out the need for a Topsham Infrastructure Delivery Framework to identify cross-boundary infrastructure requirements and delivery mechanisms for the allocations in both Exeter and East Devon. This is provided for in Policy TI1.

TI1: Topsham Infrastructure Delivery Framework: (Strategic policy)

The City Council will work closely with East Devon District Council on the preparation of an Infrastructure Delivery Framework to address development and infrastructure issues on the edge of Topsham in the Exeter City Council area and the adjacent allocation 'Development next to the M5 and north of Topsham' in East Devon.

The Infrastructure Delivery Framework will include:

- A. The timely delivery and funding of a range of infrastructure and facilities including primary education, primary healthcare, indoor space for community use, sport and recreation and green infrastructure to meet the needs from developments in Exeter and East Devon;
- B. A comprehensive transport strategy to prioritise active travel and public transport; and
- C. The need to respect Exeter's landscape setting area and the Clyst Valley Regional Park.

The Infrastructure Delivery Framework will be produced jointly by East Devon District Council and the City Council working with partners including landowners, developers, Devon County Council, the Environment Agency, Natural England, the NHS, community groups and Clyst St George Parish Council.

17. Monitoring and implementation

- 17.1 The City Council will monitor the implementation of the Exeter Plan according to statutory requirements and key priorities.
- 17.2 The monitoring and implementation framework for the Exeter Plan is outlined in a set of tables in this chapter. For each policy identified, the tables include:
 - **Indicator:** Sets out an issue against which policy implementation can be monitored related to what the policy aims to achieve;
 - Target: States a specific outcome against which an indicator can be measured;
 and
 - **Delivery mechanism:** Clarifies how the policy will be delivered.
- 17.3 Each year the outcomes of monitoring will be published in the City Council's Authority Monitoring Report (AMR).
- 17.4 It should be noted that not all policies in the Exeter Plan will be subject to annual monitoring. Statutory indicators will be monitored together with others which are important to the implementation of the Exeter Plan. Monitoring will also be undertaken proportionately in the context of the availability of robust data.
- 17.5 As housing delivery is one of the most important issues for the Exeter Plan, the monitoring framework includes a housing trajectory against which housing delivery will be monitored.
- 17.6 The City Council will also monitor progress on neighbourhood planning initiatives. Exeter currently has one made Neighbourhood Plan for the St James area, which forms part of the city's Development Plan. Some early neighbourhood planning activity has started in other parts of the city. Progress on any additional Neighbourhood Plans which emerge will be included in the AMR.

Statutory monitoring

- 17.7 Some monitoring is mandatory as set out by the Town and Country Planning (Local Planning) (England) Regulations 2012. This will be included in the AMR and is summarised below:
 - Planning policy documents to be produced by the City Council as set out in the Local Development Scheme. Details to include preparation timetable, stage reached and any reasons for delays in preparation;
 - Details of any planning policies which are not being implemented and an explanation;
 - In respect of additional homes, annual figures and figures relating to the period since plan policy adoption;
 - Details of any Neighbourhood Plan Preparation;
 - Details relating to Community Infrastructure Levy and Section 106 Agreements and monitoring expenditure; and

• Details of cooperation activity with relevant 'duty to cooperate' organisations.

Spatial strategy

S1: Spatial strategy

Indicator	Target	Delivery Mechanisms
Percentage of homes permitted on brownfield	A higher % of homes permitted on brownfield	The Exeter Plan
sites	sites than greenfield sites	Liveable Water Lane SPD
		Planning applications

S2: Liveable Exeter principles

Indicator	Target	Delivery Mechanisms
Planning decisions citing the Liveable Exeter principles	100% of decision notices for applications on the strategic mixed use brownfield	The Exeter PlanPlanning applications
	development sites to cite Policy S2	

Climate change

CC1: Net zero Exeter

Indicator	Target	Delivery Mechanisms
Percentage of major applications accompanied	100% of major applications to be accompanied by a net	The Exeter Plan
by a net zero statement	zero statement	Planning applications

CC2: Renewable and low carbon energy

Indicator	Target	Delivery Mechanisms
Amount of electricity (MW) generated from renewables in the city	An increase in renewable energy generated compared to the previous year	The Exeter PlanPlanning applications
		Collaboration with developers
		Collaboration with the energy sector

CC3: Local energy networks

Indicator	Target	Delivery Mechanisms
Number of homes connected to energy	An increase in the number of homes connected to	The Exeter Plan
networks	energy networks compared to the previous year	Local Development Order
		Planning applications
		Collaboration with developers

CC5: Future development standards

Indicator	Target	Delivery Mechanisms
Percentage of qualifying	100% of qualifying	 The Exeter Plan
development proposals that	development proposals to	
comply with Future Homes	comply with future homes	 Planning applications
Standard and Future	standard or future building	Otan dand (FUC) and
Buildings Standards	standards	 Standard (FHS) and Future Building Standard
		(FBS) from 2025.
		(1 50) 110111 2020.
		Building Regulations Part
		L

CC8: Flood risk

Indicator	Target	Delivery Mechanisms
Number of applications permitted contrary to EA	Zero	The Exeter Plan
advice		Planning applications
		Strategic Flood Risk Assessment (SFRA)
)	Collaboration with the EA

CC9: Water quantity and quality

Indicator	Target	Delivery Mechanisms
Percentage of new homes achieving average water	100% of new homes to achieve average water use	The Exeter Plan
use of 110 litres per person per day	of 110 litres per person per day	Planning applications
		Strategic Flood Risk Assessment (SFRA)
		Collaboration with the EA

Homes

H1: Housing requirement

Target	Delivery Mechanisms
Permission for at least 642	The Exeter Plan
new homes per annum	
	Planning applications
Completion of at least 642	
new homes per annum	Council delivering own
	housing stock
	Collaboration with
	developers
	Collaboration with Homes
	England
	Liigidiid
	Permission for at least 642 new homes per annum

H2: Housing allocations and windfalls

Indicator	Target	Delivery Mechanisms
Number of homes permitted on allocated sites	Delivery of homes according to trajectory	The Exeter Plan
		Planning applications
		City Council delivering own stock
		Collaboration with developers
		Collaboration with Homes England

H4: Affordable housing

Indicator	Target	Delivery Mechanisms
Average percentage and tenure split of affordable	Qualifying brownfield sites: 15% affordable housing, of	The Exeter Plan
housing secured on sites of ten homes or more, or with	which 50% for social rent and 50% for affordable	Planning applications
a site area of 0.5 hectares or more	homeownership	Council delivering own housing stock
	Qualifying greenfield sites: 35% affordable housing, of which 50% for social rent and 50% for affordable	Collaboration with developers
	homeownership	Collaboration with Homes England

H7: Custom and self-build housing

Indicator	Target	Delivery Mechanisms
Number of serviced plots for custom and self-build	Delivery of 400 custom and self-build plots within the	The Exeter Plan
homes delivered	period of 2021 – 2041	Planning applications
	Delivery of 5% custom and self-build plots on sites of 20 homes or more	

H10: Purpose built student accommodation

Indicator	Target	Delivery Mechanisms
Completion of purpose built student accommodation	At least 75% of additional student numbers since 2006	The Exeter Plan
bedspaces	studying at the University of Exeter, who need accommodation, housed in purpose built student accommodation	Planning applicationsCollaboration with the University of Exeter.

H11: Gypsy and Traveller accommodation

Indicator	Target	Delivery Mechanisms
Delivery of permanent Gypsy and Traveller pitches	Delivery of six permanent pitches by 2041	The Exeter Plan
Sypoy and Traveller piteries	profiled by 20 ft	Planning applications
		Collaboration with Registered Providers
		Collaboration with the gypsy and traveller community

H14: Accessible homes

Indicator	Target	Delivery Mechanisms
Percentage of affordable new build homes built to Building Regulations M4(3) (wheelchair user homes) standard	Delivery of 10% of all new build affordable housing built on sites of ten homes or more or with a site area of 0.5 hectares or more to Building Regulations M4(3) (wheelchair user homes) standard	The Exeter PlanPlanning applications

Economy and jobs

EJ1: Economic growth

Indicator	Target	Delivery Mechanisms
Amount of employment floorspace permitted	Additional employment floorspace permitted	The Exeter Plan
	annually	Planning applications

EJ2: Retention of employment land

Indicator	Target	Delivery Mechanisms
Amount of employment floorspace lost within the	No loss of employment floorspace within the	The Exeter Plan
established employment	established employment	Planning applications
areas	areas	

EJ3: New forms of employment provision

Indicator	Target	Delivery Mechanisms
Amount of floorspace	Additional floorspace	The Exeter Plan
permitted for new forms of	permitted for new forms of	
employment provision (e.g.	employment provision	 Planning applications
work hubs, collaborative		
workspaces)		

EJ4: Access to jobs and skills

Indicator	Target	Delivery Mechanisms
Number of major applications submitted with	100 % of applications for major development to be	The Exeter Plan
an Employment and Skills Plan	submitted with an Employment and Skills Plan	Planning applications

EJ6: New transformational employment allocations

Indicator	Target	Delivery Mechanisms
Amount of additional transformational employment floorspace permitted at the allocated employment sites	Additional employment floorspace permitted at the allocated sites annually	The Exeter PlanPlanning applications

Retail and the futures of our centres

RFC1: The future of our centres

Indicator	Target	Delivery Mechanisms
Footfall in the city centre	An increase in annual city centre footfall compared to	The Exeter Plan
	the previous year	Planning applications
		Collaboration with InExeter (BID)

RFC2: Development in, and affecting, our centres

Indicator	Target		Delivery Mechanisms
City centre vacancy rates	No more than 10% vacant units in the city centre	•	The Exeter Plan
		•	Planning applications
		•	Collaboration with InExeter (BID)

Sustainable transport and communications

STC3: Supporting active travel

Indicator	Target	Delivery Mechanisms	
Number of cycling trips	An increase in the number of cycle trips on the key city	The Exeter Plan	
	active travel routes compared with the previous	Planning applications	
	year	Exeter Transport Strategy/ Local Transport Plan 4	
		Collaboration with Partner Authorities (Devon County Council, Mid Devon District Council, Teignbridge District Council, and East Devon District Council)	

STC4: Supporting public transport

Indicator	Target	Delivery Mechanisms
Increase in city bus and rail	An increase in rail	The Exeter Plan
patronage	patronage at city stations	
	compared to the previous	 Planning applications
	year	_

An increase in city bus patronage compared to the previous year.	•	Exeter Transport Strategy/ Local Transport Plan 4
	•	Collaboration with Partner Authorities (Devon County Council, Mid Devon District Council, Teignbridge District Council, and East Devon District Council)
	•	Collaboration with rail and bus operators

STC5: Supporting more sustainable forms of car-use

Indicator	Target	Delivery Mechanisms
Low-car and car-free development accompanied	100% of permissions for low and no-car development to	The Exeter Plan
by controlled parking zones	be accompanied by provision for new or	Planning applications
	extended controlled parking zones	Exeter Transport Strategy/ Local Transport Plan 4
		Collaboration with Devon County Council

Natural Environment

NE1: Landscape setting areas

Indicator	Target	Delivery Mechanisms
Areas of land lost to development in landscape	No loss of landscape setting area resulting from	The Exeter Plan
setting area contrary to policy	development permitted contrary to policy	Planning applications
		Implementation of the Exeter Landscape Sensitivity Assessment
		Collaboration with Devon Wildlife Trust

NE2: Valley Parks

Indicator	Target	Delivery Mechanisms
Areas of Valley Park lost to development	No loss of Valley Park resulting from development	The Exeter Plan
	permitted contrary to policy	Planning applications
		Implementation of Exeter Landscape Sensitivity Assessment
		Collaboration with the Devon Wildlife Trust

NE3: Biodiversity

l arget	Delivery Mechanisms
100% of qualifying	 The Exeter Plan
development proposals consented to provide at	Planning applications
gain	 Devon Biodiversity Action Plan
	Devon Local Nature Recovery Strategy
	development proposals

NE4: Green infrastructure

Indicator	Target	Delivery Mechanisms
Number of large scale residential development	100% of large scale residential development	The Exeter Plan
proposals accompanied by a Green Infrastructure Plan	proposals to be accompanied by a Green	Planning applications
	Infrastructure Plan	Green Infrastructure Strategy

NE6: Urban greening factor

Indicator	Target	Delivery Mechanisms
Number of major	100% of permitted major	The Exeter Plan
development proposals	development proposals to	
meeting urban greening	meet urban greening score	 Planning applications
score requirements	requirements	

NE7: Urban tree canopy cover

Indicator	Target	Delivery Mechanisms
Tree canopy cover in major new developments	100% of major applications permitted to result in no net	The Exeter Plan
proposals	loss of tree canopy cover	Planning applications

History and Heritage

HH1: Conserving and enhancing heritage assets

Indicator	Target	Delivery Mechanisms
Number of applications permitted contrary to	Zero	The Exeter Plan
Historic England advice		Planning applications
		Conservation Area Appraisals
		Exeter viewpoints, density and heights study
		Collaboration with Historic England

Culture and tourism

C1: Protecting and enhancing cultural and tourism facilities

Indicator	Target	Delivery Mechanisms
The retention and enhancement of cultural and	No net loss of cultural and tourism facilities contrary to	The Exeter Plan
tourism facilities	policy resulting from development proposals	Planning applications
		Exeter Cultural Strategy

High quality places and design

D1: Design principles

Indicator	Target	Delivery Mechanisms
Proportion of major development proposal	100% of permitted major development proposals	The Exeter Plan
permitted in accordance with D1	citing Policy D1 in the decision notice	Planning applications
		SPDs (Householders Guide: Design of Extensions and Alterations SPD, Liveable

	Water Lane SPD, Residential Design Guide SPD)
	National Design Code

Health and wellbeing

HW1: Health and wellbeing

Indicator	Target	Delivery Mechanisms
Proportion of large scale residential development	100% of permitted large scale residential	The Exeter Plan
proposals with a Health Impact Assessment (HIA)	development proposals to include a Health Impact	Planning applications
	Assessment.	Health Impact Assessments
		Collaboration with Devon County Council public health department

Infrastructure and facilities

IF1: Delivery of infrastructure

Indicator	Target	Delivery Mechanisms
Total value of CIL receipts	No target	The Exeter Plan
Total value of CIL set out in all demand notices issued	No target	Planning applications
		Annual Infrastructure
Total value of Section 106 receipts	No target	Funding Statement
Total value of contributions	No target	
to be provided under any Section		
106 Agreements signed		
NB. Full monitoring reported		
in the Annual Infrastructure Funding Statements		
I unumy Statements		

IF3: Community facilities

Indicator	Target	Delivery Mechanisms
Retention and protection of built community facilities	No permitted development proposals to result in a net loss of community facilities	The Exeter PlanPlanning applications
	contrary to policy	

IF4: Open space, sport, play areas and allotments

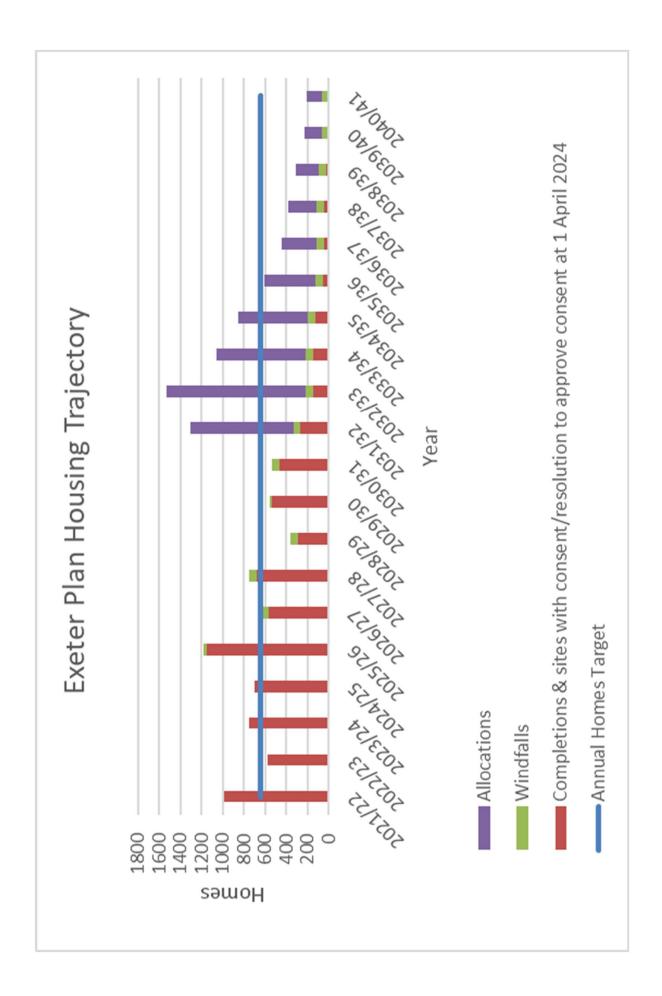
Indicator	Target	Delivery Mechanisms
Provision of open space with strategic mixed use	100% of strategic mixed use brownfield development	The Exeter Plan
brownfield developments	proposals to make on-site open space provision or	Planning applications
	contributions to off-site provision.	Liveable Water Lane SPD
		Playing pitch strategy



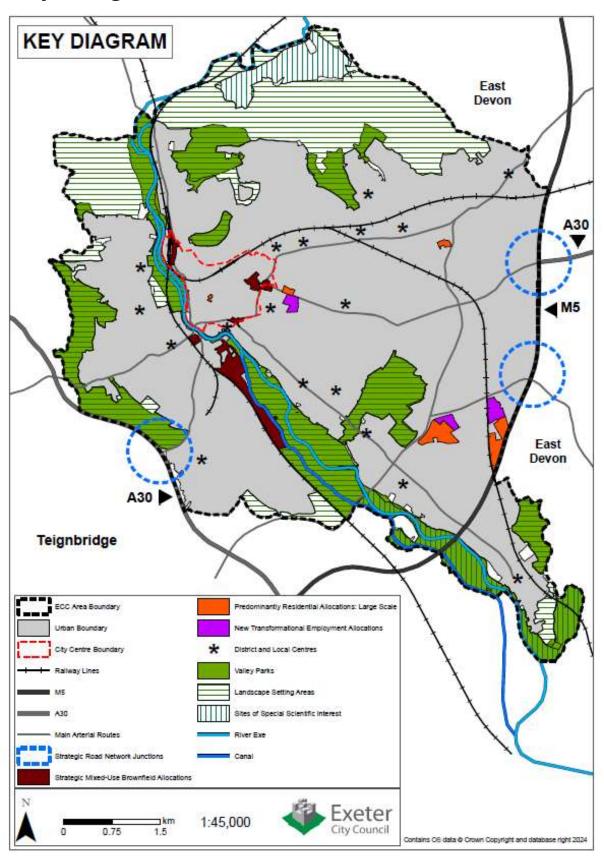
Housing trajectory

Site	Yield in the five years to Plan adoption (2021/22 to 2025/26)	Yields yrs 1-5	Yields yrs 6-10	Years 11-15	Total
Completions and sites with planning consent /	resolution t	o approv	e consen	t at 1 Ap	ril 2024
Various	4164	2552	758	126	7600
Windfalls					
Various	38	288	340	340	1006
Exeter Plan allocations					
Strategic mixed use brownfield sites					
Water Lane	0	0	1231	630	1861
East Gate	0	0	595	14	609
Red Cow/St Davids	0	0	425	17	442
Exe Bridges Retail Park	0	0	0	201	201
South Gate	0	0	81	0	81
Predominantly residential sites: large scale					
Land at Old Rydon Lane	0	0	357	0	357
St Bridget Nurseries	0	0	225	125	350
Heavitree Road police station	0	0	225	125	350
Mary Arches multi-storey and surface car park	0	0	154	0	154
Whipton Community Hospital	0	0	110	0	110
Predominantly residential sites: major	1				
Rougemont Switching Centre	0	0	86	0	86
Land at Newcourt Road, Topsham	0	0	69	0	69
Land adjoining Silverlands	0			0	67
Land to the west of Newcourt Road, Topsham	0	0	56	0	56
Land at Topsham Golf Academy	0	0	54	0	54
Land at Exeter Squash Club	0	0	48	0	48
Land and buildings at Victoria Street	0	0	47	0	47
12-31 Sidwell Street	0		45	0	45
Land to the east of Newcourt Road 2, Topsham	0	0	45	0	45
Belle Isle Depot	0	0	40	0	40
Clifford Close	0	0	33	0	33

TOTAL	4,202	2,840	5,355	1,578	13,975
91-97 Wonford Street	0	0	5	0	5
Land at Taunton Close	0	0	5	0	5
Land rear of Beacon Lane shops	0	0	6	0	6
Lancelot Road	0	0	7	0	7
Newbery Car Breakers	0	0	8	0	8
Residential sites: minor	_				
88 Honiton Road	0	0	10	0	10
Garages at Lower Wear Road	0	0	12	0	12
Land at Hamlin Lane	0	0	13	0	13
Land south of Gypsy Hill Lane	0	0	14	0	14
Fever and Boutique, 12 Mary Arches Street	0	0	15	0	15
Hessary, Hollow Lane	0	0	17	0	17
Land at Matford Lane (2)	0	0	21	0	21
East of Pinn Lane	0	0	24	0	24
Chestnut Avenue	0	0	24	0	24
Land behind 66 Chudleigh Road	0	0	27	0	27
Unit 1 Nightclub, Summerland Street	0	0	28	0	28
Gypsy Hill Hotel	0	0	28	0	28

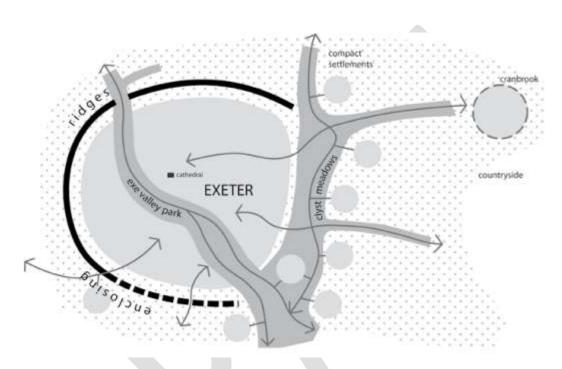


Key diagram



Appendix A:

The Green Infrastructure Spatial Framework



The GI Spatial Framework conceives Exeter as a compact city with a clear distinction between the urban area and the countryside within which it sits. It is a city supported by linked, self-contained and well-defined communities which are both historic and new.

Its key elements are defined as:

- The ridgelines that define the city to the north, west and south;
- The Exe Valley and the associated Valley Parks and linkages that help to structure the city and provide routes to the coast and countryside;
- The Clyst Valley, associated biodiversity reserves and linkages that provide connections between the settlements to the east of Exeter to the city;
- The network of routes allowing for easy sustainable accessibility between the urban area of Exeter and the surrounding countryside and, in particular the compact settlements:
- The high quality countryside within which the compact settlements sit;
- Sustainable accessibility between the compact settlements and the countryside within which they sit; and
- Bringing the countryside into the city.

The Exeter Plan This is our city • This is our future





















Contact details

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