

Exeter City Council

Exeter Plan
Sustainability
Appraisal Consultation
Responses Schedule

Prepared by LUC
July 2025



Table 1.1: Regulation 19 Consultation Comments: Exeter Plan Sustainability Appraisal

Consultee	Comments	LUC response
Environment Agency	We appreciate the opportunity to follow up on our previous response regarding the Plan's performance against the sustainability appraisal objectives. We have no substantial comments on this matter. The sustainability appraisal rightly highlights the conflicts associated with proposed housing allocations near flood zones 2 and 3 in the city. It is expected that these housing allocations will reflect an overall negative impact when assessed against SA Objective 13. Ultimately, it will be the responsibility of the council to evaluate housing allocation applications in accordance with relevant policies designed to mitigate development risks in flood-prone areas, ensuring that any subsequent development is deemed sustainable. Given the limited alternatives for housing allocations, it is crucial to prioritise effective mitigation strategies, alongside securing financing and delivery for water infrastructure. These elements are vital for the successful implementation of the plan. Additionally, we believe it is essential for the appraisal to consider the cumulative effects of further development in conjunction with climate change on the combined sewer network. We are confident that the Plan sufficiently addresses these impacts on water quality, thereby safeguarding amenity, ecology, and economic interests.	Noted. Waste water treatment capacity to accommodate the total scale of development resulting from the Plan is being considered through separate evidence base work for the Plan – the IDP. The Habitat Regulations Assessment of the Exeter Plan has also addressed hydrological issues, specifically water supply and water quality, concluding that <i>'the outcome of the Water Resources Management Plan and Drainage and Wastewater Management Plan and their respective Habitat Regulations Assessment indicate that adverse effects can be ruled out alone or in combination for the Exe Estuary SPA/Ramsar with respect to hydrological issues'</i>.
Natural England	Site Allocations Objective 14 Para. 5.32 mentions the loss of Best & Most Versatile soils. Natural England would have welcomed the recommendation for the inclusion of a soil management policy or a requirement in the allocation policies for good soil management, as per our previous advice at Regulation 18 stage. However, we do not believe this to be a soundness issue.	Noted, no action required at this stage, although it would not be inappropriate to revise the Exeter Plan if considered reasonable.
Historic England	We do not wish to comment in detail on the Sustainability Appraisal at this stage.	Noted.
Cllr Diana Moore - Leader of Green Group	The SA highlights The Council's Green Infrastructure Strategy (December 2009), however this is somewhat out of date and does not respond to current policy for example the Natural England, Green Infrastructure Framework (2023) which aims to help increase the amount of green cover to 40% in urban residential areas (B.47 p 355) however it notes how out of date existing Council strategies are in regard to local and green spaces: "The Parks and Open Spaces Strategy dates back to 2005 and is currently in the process of being updated with a new Parks and Greenspace Strategy" - no publication date is known. Enquiries on the emerging strategy have found "There is scope to join up smaller green spaces to form larger green corridors with active recreation and habitat benefits;"	Noted, no action required. Comment relates to the evidence base for the Plan.
Cllr Diana Moore - Leader of Green Group	The Sustainability Appraisal does not model or address the extent to which the implementation of the Local Plan will produce or reduce green house gases, or what contribution it will make in terms of achieving Net Zero 2030 a policy objective of Exeter City Council.	Policies and allocations in the Plan, as well as the reasonable alternative options, have been appraised against the SA objectives which include objective 1: <i>To achieve net-zero emissions and support adaptation to unavoidable climate change.</i>

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Matson, Trevor & Eames (AGENT - Christian Leigh, ORGANISATION - Leigh & Glennie Ltd)	Site ID: 26. The Appraisal is supported, but please see supplementary statement for explanation as to why the site can score more highly on sustainability grounds. SUPPLEMENTARY STATEMENT The Appraisal of the site is generally supported, but there are small corrections to the appraisal that need to be pointed out, as follows. The site is a sustainably located one, and these corrections emphasise this point further, and show that the site can be seen to have an even higher degree of sustainability than identified in the Appraisal: SA4. The site does not contain an area of open space. It adjoins an open space, but that is not the allocated site. The sketch proposals show a mixed development, to improve existing sports facilities, and so there would be an improvement to the physical and mental health and wellbeing of residents. The summary on this point should therefore be 'significant positive++', and certainly not 'uncertain significant negative-?'. SA7. The site is adjacent to the University and is to provide student accommodation. It will provide good access to services, facilities and education. The summary on this point should be 'significant positive++', and certainly not 'uncertain minor negative-?'. SA10. The site does not contain an existing green infrastructure asset that could be lost as a result of new development. The site contains the squash club building and car parking. There are trees along a boundary, but these do not need to be removed or harmed during any redevelopment scheme. The summary point should be 'minor positive+'. SA12. The feasibility study accompanying the Local Plan submission has undertaken a thorough assessment of the site and the surroundings. This is more relevant than the, understandably, broad-brush assessment undertaken in the Sustainability Appraisal, and shows how there would be an enhancement to the area due to the removal of the existing building and a new building of better design quality. The summary on this point should be 'positive+'.	All site options including this one have initially been subject to SA in line with the site assessment criteria, based only on the site boundary and no other information (i.e. a policy-off appraisal). The preferred sites have then been subject to policy-on appraisal taking into account the specific proposals for the site as detailed in the allocation policy; however broadly building on the policy-off appraisal. Therefore, some of the proposed amendments to the appraisal findings would not be appropriate as they would introduce inconsistency in the SA methodology. However, the following points are noted in response to the specific issues raised: - Against SA objective 4, the site has been identified as having a mixed significant positive and potential uncertain significant negative effect (++/--?) due to the proximity of the site to open space which could be used by residents, but also in recognition of the site containing an area of open space according to the GIS dataset used to inform the SA. The same point applies to the effect identified against SA objective 10. - Against SA7, it is recognised that if the site is to provide student accommodation, proximity to primary and secondary schools is not relevant in the same way as it is for other residential site options. - The effects on SA objective 12 have been based on the Heritage Impact Assessment carried out to inform the Local Plan preparation. It should be noted that the site is proposed for allocation in the Plan as submitted; therefore any perceived under-scoring of the site in the SA have not led to it being rejected for allocation.
Mr Nigel Escott	We have mentioned above why we believe the Sustainability Appraisal in terms of site 36 is flawed (Response added in the form in 5b and 5c) 5 (b) As suggested so as to avoid repeat representations, I write on behalf of the 8 co-owners of land to the south of Woolsgrove House, Church Hill Pinhoe EX4 9JG, known as Site 36 in the HELAA. We support the designation of Land under policy Natural Environment 1 for green open landscape areas to the north of Exeter aimed at protecting the rural landscape and character/setting of the area for the local Pinhoe community and the city as a whole.	Comments do not relate to the SA.

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	However, we feel the Settlement Boundary has been drawn incorrectly at the above location. We suggest the boundary should reflect the edge of the existing urban development, which has been previously defined by the local planning authority to be Woolsgrove, 1 and 2 Hill Cottages and Turret, and Woolsgrove House, Church Hill, Pinhoe, EX4 9JG. These properties and site 36 are served by a private driveway. In reality, these houses form the urban settlement boundary of Pinhoe. Woolsgrove sits on contour 84 m, and with the exception of 10 or so houses to the east, built as part of the Home Farm development, no new development has been constructed or permitted higher than this level. This has been supported by three planning inspectors with regards to planning appeals on land to the north and north east of the properties. NE 1 Planning status at EX4 9JG 1: Higher Fields, Church Hill planning application refusal for 63 dwellings 21/0223/OUT and Appeal dismissal APP/Y1110/W/21/3287921 2: Land at junction of Church Hill and Church Lane for 1 dwelling 22/1610/FULL and Appeal dismissal APP/Y1110/W/24/3340520 3: Land at Church Hill for 18 bungalows planning refusal (July 2024)23/0958 /FULL. It is noted the developer has not sought to appeal this decision, thus preserving the rural character and landscape setting of the area. (information from map) We agree that Woolsgrove is part of Pinhoe, as are its neighbours to the south, and that it is correctly excluded from Policy NE1. It therefore does not seem sustainable that its neighbours to the West, Woolsgrove House, 1 and 2 Hill Cottages and the Turret are included in policy NE1. These houses have been constructed for 100 years, and about the new Pulling Road development, known as Nexa Fields, to the south. Nexa Fields comprises 40 units built on Landscape Setting 1 land, aka NE1, see planning permission 19/0962/FULL. This development adjoins Site 36 and can provide alternative access and services to Site 36, which also benefits from extensive road frontage onto Church Hill to the east. Site 36 comprises approximately 2 acres: a 1.25 acre unused field and 0.75 acres forming Woolsgrove, a detached house and garden. Together they offer an opportunity to comprehensively build a residential development of homes/bungalows, on an infill site. Site 36 is surrounded on all sides by residential development. Two of these properties co-own the site with a third-party. Allwynds, Panorama and Foxways are three bungalows to the east on Church Hill, and have 10 feet boundary / privacy hedges and consequently no view over the site. Two properties to the west are new houses numbered 3 and 4 Nexa Meadow on the Nexa Field development and have no windows overlooking the site. Two houses to the south, numbers 12 and 13 Bickleigh Close, have a northerly aspect over the site. There is an adjacent property at 10 Bickleigh Close which has for at least 20 years, a very large extended garden, which adjoins the south western corner of Site 36. This boundary has been heavily planted by the	

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	homeowner. As this has been used as garden, Site 36 should therefore be regarded as an infill residential development opportunity. Site 36 comprises of the field together with Woolsgrove, which contribute 1.25 acres and .75 acres respectively. The field is too small to be farmed and is too remote. The soil is clay and therefore offers very poor agricultural potential. The site has not been grazed for at least 10 years, and remains unused. We agree that it is not suitable for industrial/employment use as it is now surrounded by housing. The only sustainable and effective land use for site 36 is residential development. Part of Site 36 is already designated as such. We suggest that in order to provide a high-quality and comprehensive development that this should be developed with the land at Woolsgrove, as originally promoted by the land owners. The site lends itself to a small bungalow / low rise / mono roof development, thereby ensuring that the scheme remains invisible in the local Vista and below the ridge lines of the neighbouring Nexa Fields houses, Woolsgrove House and Woolsgrove. The local distinctiveness and character of the area would not be adversely affected by a high-quality residential development on this site. It should also be noted that to the east of Site 36, are 100 house built as part of the Home Farm development on land also zoned Landscape Setting 1. The fields forming part of this site are considerably higher than the subject Site 36, and the aforementioned Church Hill properties forming the suggested revised Settlement Boundary. The highest land is used as a play area and sustainable urban drainage pond. There are however, a dozen houses situated on land higher than the 84 meter contour line, which were approved at planning appeal. The planning inspector felt that the Home Farm appeal site offered limited medium landscape value, and consequently Site 36, situated further down the hill and surrounded by housing must rank below this in terms of merit. Site 36 forms part of Site LP12 in the Landscape Sensitivity Assessment Aug 2022. It is noted that Site LP12 straddles the real Settlement Boundary; the northern fields afford high landscape value and are rightly included in new Policy NE1, whilst the land to the south, Site 36, does not, as it is now surrounded by housing. Whilst the highways agency had no objections to a small development at Woolsgrove, (or in fact the proposed 18 dwellings to the north which was subsequently and rightly refused), there may be a Highways opportunity to improve the driveways to Woolsgrove and the adjacent private driveway serving properties to the west and Site 36. Residential development of site 36 could offer an opportunity to connect the three bungalows on Church Hill to the main sewer, therefore these adjoining properties could all benefit from Site 36 being developed. Consequently, we believe that the settlement boundary, as currently drawn as part of Policy NE1 does not comply with NPPF 2, 5 and 11 because it prevents sustainable residential development in a sustainable location. The policy doesn't make effective use of available Land by including Site 36 in policy NE1. To comply with the NPPFs, the NE1 boundary should be redrawn to exclude site 36 and the neighbouring houses to the west, and use a line to the north of the private driveway as the Settlement Boundary. This will offer a definitive and sustainable settlement boundary that has already been proven at three planning appeals.	

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Devon Archaeological Society - President: Stuart Baylock	The Sustainability Appraisal proformas are based on the Heritage Impact Assessments (HIA) to which we have objected for reasons set out above. There is a clear indication that the under-recognition of archaeological potential in sites, the playing down of the possibility of harm to the 'significance of the historic environment/assets' (not least because of the information-free descriptions of the HIA, as referred to above) and their repeated dismissal as 'Negligible' in terms of 'SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets', all combine to diminish and play down the overall significance of the archaeological resource. This is a problem arising from process: assessments built up from hard knowledge of the archaeology will be informed by the process; those made by means of a repetitive cut and paste exercise without reference to existing knowledge will remain void.	Comments relate to the HIA which has been used in the SA, rather than the SA itself.
Elizabeth (no surname provided)	How had future flood risk and sea level rise been included and planned for as coastal change management areas for canal quay and riverside areas? Access and planning is essential. Not just as future development policies adaptation of existing is really important to stop negative legacy for future generations.	The policies and site allocations in the Plan, and their reasonable alternatives, have been appraised against SA objective 13: <i>To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources</i> . Sites that are within Flood Zone 3 (meaning that they have a high probability of flooding from rivers or the sea) are identified as having likely significant negative effects in the SA.
Neil Parsley	Before any further proposals are considered it is essential that the vehicular congestion in this area should be dramatically reduced for the welfare of our current & future generations. This should start with a detailed study of the traffic emissions along Topsham Road & other arterial roads in Exeter. It is also crucial that scientists publish a study of the potential emissions from this heat exchange plant which will increase the pollution in this area? If it is essential to build a renewable energy heat exchanger plant, why can't it be constructed on existing industrial brownfield sites or in one of the many empty warehouses in Marsh Barton. Belle Isle is a greenfield site with lots of wildlife habitats that must be preserved for future generations to enjoy. ECC must take into account the increased traffic congestion & pollution that the proposed Heat Exchange Plant will cause during its construction & from its use.	Comments do not relate directly to the SA.