
Examination of the Exeter Local Plan

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Date: 6 January 2026

Matters, Issues and Questions

Published v1

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Introduction

Prior to the forthcoming hearing sessions, responses are invited from participants on the following Matters, Issues and Questions ('MIQs') for Examination. The MIQs are based on the Main Issues identified by the Council and other relevant issues raised by representors.

Participants should only respond to the questions which directly relate to their previously submitted written representations on the plan. Please clearly indicate in your statement(s) the question(s) you are answering. Further statements should be proportionate in length to the number of questions being answered.

The plan is being examined as submitted by the Council. The questions concerning soundness are primarily focussed on the plan's policies. Insofar as they relate to the plan's soundness other elements of the plan, including the supporting text, will be considered as part of the discussion of the relevant policies.

Where reference is made to the 'Council's suggested modifications' to the Plan, this refers to the schedule of changes that the Council has submitted in Core Submission Document CSD-03. As set out in the *Examination Guidance Note*, only the appointed Inspectors can recommend Main Modifications if they are necessary to resolve problems that would otherwise make the Plan unsound. Any potential Main Modifications will be discussed, where appropriate, at the relevant hearing session and must be subject to public consultation.

As set out in the *Examination Guidance Note*, the deadlines for providing hearing statements are **13 February 2026** for Matters 1 to 9 and **24 April 2026** for Matters 10 to 15.

In answering questions and producing hearing statements, participants should be aware of the further documents which have been added to the Examination library following submission of the Plan. These include, amongst others, the Greater Exeter Transport Study Scenario 2 Supplementary Report. Other documents may be added as the examination progresses so participants should regularly monitor the Examination library and website to keep themselves updated.

Further information about the examination, hearings and format of written statements is provided in the accompanying *Examination Guidance Note*, which should be read alongside the MIQs.

Matter 1 – Legal Compliance

Issue 1 – Duty to Cooperate

1. The Council states that it has demonstrated cooperation on strategic matters with East Devon District Council (EDDC) as shown in the agreed Statement of Common Ground¹ (SoCG). However, there remains disagreement on strategic matters relating to employment land. The Exeter Plan relies on land outside its boundaries for employment, in particular land within East Devon and Teignbridge. EDDC have stated that the employment land within their local authority boundary would only meet their needs and not those of Exeter. Modifications have been suggested to address this issue, and these have been referred to in the SoCG.
 2. The agreed SoCG with Devon County Council (DCC) details that a concern remains that a reliance on the delivery of Gypsy, Roma and Traveller pitches via windfall sites does not offer the same level of certainty that allocating a specific site within the Plan would. Modifications have been suggested by ECC to ensure a review of the need for, and delivery of, gypsy and traveller accommodation as set out in Core Submission Document CSD-03.
 3. Torbay Council (TD) also detail that Torbay is unlikely to be able to meet its Local Housing Need, it acknowledges ECC's constrained boundaries and the likelihood that development in the City will likely be needed to address Exeter's own LHN. A modification has been suggested to address this issue, and these have been referred to in the agreed SoCG.
 4. The agreed SoCG with National Grid Electricity Transmission (NGET) reports of no representations being made in relation to the 'Homes' chapter. However, a representation has been submitted by National Grid Electricity Distribution (South West) Plc (NGED) which highlights the limited capacity available within the existing grid network to serve new development in Exeter stating '*capacity within the National Grid serving Exeter is particularly limited and represents a significant constraint to the delivery of new developments until critical reinforcements of the grid are delivered*'.
- Q1. Taking the above into account, what evidence can the Council point to which demonstrates that it has engaged constructively, actively and on an ongoing basis in relation to the known cross-boundary issues?
- Q2. Are there any remaining issues (such as grid capacity or sports facilities) to resolve in relation to matters of soundness or legal compliance?

¹ Document DTC-03c

- Q3. Have any neighbouring authorities approached the Council to help address their unmet needs or vice versa? If so, what process did the Council follow and what was the outcome?
- Q4. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to the advice contained in the National Planning Policy Framework ('the Framework') and the Planning Practice Guidance ('the PPG')?
- Q5. Is the Plan consistent with paragraphs 24 to 27 of the Framework which require strategic policy-making authorities to maintain effective cooperation on strategic matters that cross administrative boundaries?
- Q6. In terms of this issue, are there any other suggested modifications in the Schedule of Suggested Modifications² necessary for soundness?

Issue 2 – Public Consultation

- Q1. Has public consultation been carried out in accordance with the Council's Statement of Community Involvement³ the Framework, the PPG and the requirements of the 2004 Act and 2012 Regulations? If not, what were the reasons why?
- Q2. Were adequate opportunities made available for participants to access the Plan, and other relevant documents, in different locations and in different formats (such as in paper and online)?
- Q3. Were adequate opportunities made available for participants to submit and make representations, having particular regard to the length of public consultation and the process for making comments?

Issue 3 – Sustainability Appraisal

- Q1. Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:
- a) Its assessment of the likely effects of the plan's policies and allocations?

² Core Submission Document CSD-03

³ Evidence Base Document SUP-10

b) Its consideration of reasonable alternatives, including the alternative spatial strategy options and why they were discounted?

- Q2. How were the strategic policy options A-D determined? Are there any other reasonable strategic policy options that should have been tested by the Council through the SA, and if so, why?
- Q3. Do any of the strategic policy options test a scale of housing growth that would enable affordable housing needs to be met in full? If not, what are the reasons why?
- Q4. How were the policy options determined? Are there any other reasonable policy options that should have been tested by the Council through the SA, and if so, why?
- Q5. How were suitable and potentially suitable housing sites determined for the purposes of the SA? What type of sites were discounted as part of this process?
- Q6. Is the SA based on a robust and up-to-date assessment of housing, mixed-use and employment sites? Were adequate reasonable alternative options considered and were they tested on a consistent basis?
- Q7. How were employment site allocations tested as part of the SA and how (if relevant) was the approach different when appraising residential site allocations?

Issue 4 – Habitats Regulations Assessment

- Q1. Have the requirements for appropriate assessment under the Habitats Regulations been met? Have the results of the Habitats Regulations Assessment been carried forward in the Exeter Plan?
- Q2. What measures will the Exeter Plan put in place to ensure that likely significant effects would be avoided?
- Q3. Where recreational disturbance is concerned, the HRA concludes that mitigating the effects of Local Plan growth on the Exe Estuary SPA/Ramsar, Dawlish Warren SAC and the East Devon Heaths SAC/SPA is necessary for certain developments by contributing towards the ongoing application of the South East Devon Joint Habitat Sites Mitigation Strategy. Is the Exeter Plan sufficiently clear which allocations this relates to, including (where relevant) different types of development?

- Q4. What are the main reasons for concluding that the likelihood of impacts from residential development on functionally linked land can be ruled out? Are the conclusions reasonable and robust?
- Q5. What measures will the Exeter Plan put in place to ensure that likely significant effects would be avoided from relevant windfall sites, not only for residential development but other uses such as renewable energy projects?

Issue 5 – Climate Change

- Q1. Does the Plan (taken as a whole) include policies designed to secure that the development and use of land in the area contributes to the mitigation of, and adaptation to, climate change? If so, how?

Issue 6 – Strategic Flood Risk Assessment

- Q1. Is the Plan consistent with paragraph 167 of the Framework which states that all plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property?
- Q2. What is the justification for allocating land for development where sites fall (even in part) within Flood Zone 3? Were all such sites included within the level 2 SFRA?

Issue 7 – Public Sector Equality Duty

- Q1. In what ways does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

Issue 8 – Other matters

- Q1. Where the Plan contains a policy that is intended to supersede another policy in the adopted development plan, does it state that fact and identify the superseded policy?
- Q2. It is proposed via suggested modification SMM1 to revise the plan period from 2021- 2041 to 2022 - 2042. What is the justification for this suggested modification? Is it necessary for soundness?

- Q3. Will the plan period cover a minimum 15-year period from the anticipated date of adoption?

Matter 2 – Housing, Employment and Retail Need

Issue 1 – Local Housing Need and the Housing Requirement – Policy H1

5. To determine the minimum number of homes needed, paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance ('the PPG') – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- Q1. What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?
- Q2. Have any changes in the methodology, since the preparation of the Plan, resulted in any meaningful or significant changes to the calculation?
- Q3. Is there any historic unmet need that should be taken into account?
- Q4. Has the Council identified land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, as required by paragraph 70 of the Framework? Does this include sites which have already been completed?
6. The PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances where this may be appropriate include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.
- Q1. Do any of these circumstances apply to Exeter?
- Q2. Does the PPG list only those circumstances where it would be appropriate to plan for an alternative level of housing provision than the standard method, or could other locally specific reasons justify a higher figure?
- Q3. Is the housing requirement of 12,840 new homes over the plan period justified and consistent with national planning policy and guidance? If not, what should the housing requirement be?

- Q4. How have projected levels of economic growth been factored into the calculation of the housing requirement?
- Q5. How has the limited capacity of the existing power grid network in Exeter been considered? Are any related and necessary strategic infrastructure improvements being proposed? If so, should the housing requirement be higher? If not, should the housing requirement be lower?

Issue 2 - Affordable Housing Need

- Q1. The Exeter Local Housing Needs Assessment (LHNA) 2024 states that the overall need for affordable housing is around 805 homes per year for the plan period 2021 - 2041. Is this figure accurate and robust? If not, what is the need for affordable housing over the plan period?

Issue 3 – Employment Land Requirement

7. The PPG⁴ advises that strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as labour demand, labour supply, past take-up of employment land and consultation with relevant organisations.

Q1. How have these factors been taken into account in determining future demand for employment space in Exeter?

8. The Economy and Jobs Topic Paper⁵ identifies a need for about 255 hectares of employment land across the Greater Exeter Functional Economic Market Area (FEMA) and around 71 hectares for Exeter, based on the mid-point economic growth scenario.

Q1. How has this requirement figure for Exeter been established? Is it robust and based on appropriate available evidence? Is this a minimum requirement and is it adequately set out in the Plan?

Q2. The Topic Paper also suggests that the Plan will supply about 21 hectares of employment land. Is the Plan justified in seeking to allocate less employment land than required? If this need for employment land cannot be met in Exeter, how and where will it be met?

⁴ Paragraph: 027 Reference ID: 2a-027-20190220

⁵ Document TOP-04

- Q3. How does the updated Functional Economic Market Area supply position, as set out in 7.18 of the Economy and Jobs Topic Paper⁶ affect the employment land requirement?

Issue 4 – Retail Need – Policies RFC1 and RFC2

- Q1. Where are the anticipated needs for retail, leisure, office and other main town centre uses set out? Is the information on future needs based on appropriate and up-to-date evidence?
- Q2. Does the Local Plan allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least 10 years ahead, as required by paragraph 90 of the Framework?
- Q3. What would be considered 'robust evidence' under Policy RFC2? Would this requirement be applicable to all proposals, or just those outside of town centres?
- Q4. How does Policy RFC2 ensure that larger scale and comparison retail can be accommodated on the strategic mixed use brownfield allocations?
- Q5. Are policies RFC1 and RFC2 positively prepared, justified, effective and consistent with national policy?
- Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications⁷ necessary for soundness?

Matter 3 – Spatial Strategy and Distribution of Development

Issue 1 – Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2

- Q1. What is the justification for the requirement in Policy S2 for homes to be provided that are predominately dual aspect?
- Q2. Is the strategic approach of focussing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?

⁶ Document TOP-04

⁷ Core Submission Document CSD-03

- Q3. How does Policy S2 relate to the Exeter St James Neighbourhood Plan and its principle of 'community balance'?
- Q4. Does the distribution of development from allocations, commitments and completions since the start of the plan period reflect the overall spatial strategy set out in Policies S1 and S2?
- Q5. Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?
- Q6. What process did the Council follow to determine the distribution of this new development? Was this process robust and based on reasonable judgements about where to direct new development?
- Q7. Have Policies S1 and S2 been included within the Local Plan Viability Assessment and tested to ensure that they are viable and deliverable?
- Q8. Do the Liveable Exeter principles apply to greenfield development, or just large-scale brownfield developments?
- Q9. Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?
- Q10. Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints?
- Q11. Would an alternative distribution within the Plan area of the same amount of new development be likely to have significantly less impact on the strategic road network?
- Q12. For the plan to be sound, is it necessary for there to be additional evidence, at this stage, of the likely impacts of the new development proposed in the plan on junctions 29, 30 and 31 of the M5 and on the A30, A38 and A379 roads?
- Q13. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Employment Growth – Policy EJ1

- Q1. The Greater Exeter Economic Development Needs Assessment (EDNA) contains a baseline forecast of jobs growth for Exeter of around 13,500 new jobs over the period 2020-2040. The Economy and Jobs Topic Paper⁸ states that this will be exceeded with growth of about 14,900 new jobs over the plan period. Is this level of job growth realistic? How has it been calculated and how does it compare to other projections for employment in other parts of Greater Exeter over the plan period? How does it compare to past performance?
- Q2. How does the projected number of jobs compare to the supply of employment land and housing land? Could the projected number of new jobs (and thus homes and employment land needed) be higher?
- Q3. What is the difference between the four economic growth scenarios set out in the evidence⁹? Why does the Council consider the mid-point economic growth scenario to be the most appropriate baseline for plan making purposes¹⁰?
- Q4. What is the justification for the suggested modifications to Policy EJ1? Why are they necessary for soundness?

Matter 4 – Site Allocations Process and Methodology

Issue 1 – Site Allocation Methodology

- Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?
- Q2. How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield land?
- Q3. How did the Council consider the infrastructure requirements of the growth proposed in the Plan (such as grid capacity and the strategic road network) and how did this inform the site selection process?

⁸ Document TOP-04

⁹ Documents EVB-EJ-03a and EVB-EJ-04

¹⁰ Paragraph 7.20 of Economy and Jobs Topic Paper

- Q4. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?
- Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 5 – Housing Land Supply

Issue 1 – Total Housing Land Supply

- Q1. Is there convincing evidence to demonstrate that the Plan's housing requirement to the end of the plan period will be met?
- Q2. Is there convincing evidence to demonstrate that there is a reasonable prospect of a five-year supply of deliverable land for housing being maintained throughout the plan period?
- Q3. What are the implications of the proposed revision of the plan period on overall housing supply?
- Q4. What proportion of the total housing supply is derived from purpose-built student accommodation? Is the Plan over-reliant on the provision of this type of accommodation to meet the housing requirement?
- Q5. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?
- Q6. Paragraph 70 of the Framework sets out that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise (SME) housebuilders to deliver new homes and are often built out relatively quickly. How are SME housebuilders supported in the plan?
- Q7. How has the limited capacity of the existing power grid network in Exeter been considered? Does this have any impact on the total housing supply?
- Q8. In terms of this issue, are any of the other suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 - Five-Year Housing Land Supply

- Q1. What is the five-year housing land requirement?
- Q2. Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?
- Q3. What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?
- Q4. Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?
- Q5. Is there convincing evidence to demonstrate that there will be a five-year supply of deliverable land for housing following adoption of the plan with an appropriate buffer applied?
- Q6. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 72 of the Framework?
- Q7. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?
- Q8. What flexibility does the Plan provide if some of the larger sites, such as Water Lane, do not come forward in the timescales envisaged?
- Q9. What are the implications of the proposed revision of the plan period on the five-year housing land supply?
- Q10. In terms of this issue, are any of the other suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 6 – Energy, Climate Change and Flooding

Issue 1 – Net Zero, Low Carbon Energy, Renewable Energy and Local Energy Networks – Policies CC1, CC2, CC3, CC4, CC5 and CC6

- Q1. Is it sufficiently clear what is meant by ‘net zero’ for the purposes of Policy CC1? How will the policy be implemented and how will it be effective?
- Q2. Does Policy CC1 apply to all development? Are the requirements set out in Policy CC1 justified, effective and consistent with national planning policy? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q3. Should Policy CC1 acknowledge that targets will be dictated by national policy and up to date building regulations, rather than local policy?
- Q4. What is the justification for rejecting any proposal for energy generation from a source that is not renewable or low carbon in Policy CC2? Is this approach consistent with national planning policy and guidance?
- Q5. Is it sufficiently clear what is meant by ‘unacceptable impacts’ for the purposes of Policy CC2? How will the policy be implemented and how will it be effective?
- Q6. Policy CC3 requires all new development with a floorspace of at least 1,000 square metres or comprising ten or more homes and located in certain areas, to have heating system that are compatible with either a proposed or existing local energy network. What is the justification for this approach? Is the policy sufficiently flexible in this regard to be effective? Has this requirement been adequately tested to ensure that it is viable and deliverable?
- Q7. Is it clear to users of the Plan what measures all development proposals (excluding householder developments) need to include to allow for future connection to ‘local energy networks’ under Policy CC3? Will this be possible for all development types and locations?
- Q8. How has the potential impact of any necessary underground infrastructure on archaeology been considered in the formulation of policies CC3 and CC4?

- Q9. Criterion e) of Policy CC4 requires the protection of the setting of heritage assets. Is this approach consistent with national planning policy in particular paragraph 207 of the Framework?
- Q10. Are the other requirements set out in Policy CC4 justified, effective and consistent with national planning policy? Does the Written Ministerial Statement for solar, food security and best and most versatile land published on 15 May 2024 have any implications for soundness of this Policy CC4?
- Q11. Do the minimum standards in Policy CC5 go beyond the relevant future Building Regulations and Future Homes Standard? If so, is there a well-reasoned and robustly costed rationale including in respect of development viability, housing supply and affordability? If Policy CC5 does not go beyond the future Building Regulations, why is the policy necessary?
- Q12. Is Policy CC5 consistent with the national policy position towards achieving net zero and the expectations of the Government's Written Statement "Planning - Local Energy Efficiency Standards Update" made on 13 December 2023?
- Q13. Is it sufficiently clear what is meant by 'adequate steps' for the purposes of Policy CC6? How will the policy be implemented and how will it be effective? Is the policy sufficiently flexible to be effective?
- Q14. Policy CC6 only allows the one-for-one replacement of existing dwellings where it can be demonstrated that refurbishment is not feasible or viable, or where it is demonstrated that the proposed new build would perform better than refurbishment in terms of lifecycle carbon footprint. What is the justification for this approach?
- Q15. Is it sufficiently clear what Policies CC1, CC2, CC3, CC4, CC5 and CC6 require from decision-makers and developers? Have the requirements been adequately tested to ensure that they are viable and deliverable?
- Q16. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 - Climate Resilience, Flood Risk and Drainage – Policies CC7, CC8 and CC9

- Q1. Will Policy CC7 provide an effective framework for climate change resilience in new development? Is it sufficiently clear how plan users should respond to the policy requirements?
- Q2. Is Policy CC8 positively prepared, justified, effective, and consistent with national planning policy in particular paragraph 173 of the Framework and the inclusion of safe access and escape routes where appropriate?
- Q3. Policy CC9 requires all new development to achieve a minimum estimated water use of not more than 110 litres per person per day. What is the justification for this approach? Is it consistent with national planning policy and based on robust, up to date evidence?
- Q4. Has this requirement been adequately tested to ensure that it is viable and deliverable? How would this requirement be effectively implemented and monitored? Is the policy sufficiently flexible in this regard to be effective?
- Q5. Is it sufficiently clear what Policies CC7, CC8 and CC9 require from decision-makers and developers? Have the requirements been adequately tested to ensure that they are viable and deliverable?
- Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 7 – Meeting Housing Needs

Issue 1 – Affordable Housing – Policy H4

- Q1. How will affordable housing be delivered on brownfield land as a result of Policy H4? Does this approach reflect the evidence in the Local Plan Viability Assessment and its Addendum?
- Q2. How have the requirements for affordable housing on brownfield land been established as part of the plan-making process? Are they justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- Q3. Should the requirements for affordable housing on brownfield land also apply to greenfield land? Is the policy sufficiently flexible in this regard to be effective?
- Q4. Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?
- Q5. What are the viability implications of the preference for 30% for all first homes that meet the affordable home ownership requirement to be sold at a 50% market price discount?
- Q6. What would constitute the 'exceptional circumstances' to enable off site delivery of affordable housing?
- Q7. For soundness, is it necessary for affordable housing delivery to be shown in the trajectory?
- Q8. What is the justification for the suggested modifications to Policy H4? Why are they necessary for soundness?

Issue 2 – Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12

- 9. Paragraph 63 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
 - Q1. What are the identified needs for housing for older people, build-to-rent housing and co-living housing in Exeter and how will these respective needs be met over the plan period?
 - Q2. How would co-living housing provide 'high quality accommodation'? Should Policy H6 include minimum communal room sizes and functional definitions for these spaces? Would co-living housing be expected to meet the needs of people with disabilities? Is Policy H6 sufficiently clear and effective in these regards?
 - Q3. How have the effects of the development and potential overconcentration of co-living housing, houses in multiple occupation and/or purpose-built student accommodation on the residential amenity of existing residents and communities been considered in the formulation of Policies H6, H10 and H12? Are the policies sufficiently clear and effective in this regard?

- Q4. What is the justification for the locational requirements for purpose-built student accommodation in Policy H10?
- Q5. Would purpose-built student accommodation be expected to meet the needs of people with disabilities? How would the private car-parking needs of such students be met? Is Policy H10 sufficiently clear and effective in these regards?
- Q6. Are the affordable housing requirements in Policies H8 and H9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q7. How would the letting of purpose- built student accommodation during holiday periods be controlled? Is Policy H10 sufficiently clear and effective in this regard?
- Q8. How would Policy H12 effectively control net increases in water discharges? What would constitute the 'exceptional circumstances' mentioned in paragraph 6.72?
- Q9. How has the Exeter St James Neighbourhood Plan and its principle of 'community balance' been considered in the formulation of these policies?
- Q10. Are policies H5, H6, H8, H9, H10 and H12 positively prepared, justified, effective and consistent with national planning policy?
- Q11. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 3 – Custom and Self-Build Housing – Policy H7

- Q1. What is the identified need for self-build and custom housebuilding in Exeter? How did the Council identify this need, and will it be met over the Plan period?
- Q2. How many self or custom build homes have been provided as a percentage of total output over the past 5 years?

- Q3. How many self or custom build homes will be delivered in Exeter given the minimum density of 50 dwellings per hectare recommended by the Exeter Density Study¹¹.
- Q4. Are the requirements set out in Policy H7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 4 – Meeting the Needs of Gypsies and Travellers – Policy H11

- Q1. What is the total need figure over the plan period? What is it based on and how has it been calculated? Is the Exeter City Council Gypsy and Traveller Accommodation Assessment and its methodology appropriate and sufficiently robust?
- Q2. Taking into account the answer above, what is the total number of additional pitches required over the plan period to meet this need?
- Q3. Does the Plan make suitable provision to meet identified needs? Will needs be met in full? Is there an over-reliance on windfall sites to meet these needs? If so, is this approach justified?
- Q4. Has the Council identified any needs for transit site provision, and how will these needs be met?
- Q5. Does the Plan provide sufficient pitches to provide five-years' worth of supply?
- Q6. Is Policy H11 positively prepared, justified, effective and consistent with national planning policy as set out in paragraph 63 of the Framework?
- Q7. What is the justification for the suggested modifications to Policy H11? Why are they necessary for soundness?

¹¹ Evidence Base Document EVB-H-08

Issue 5 – Residential Accommodation, Amenity and Healthy Homes – Policies H13 and H16

- Q1. How would Policy H13 be effectively implemented?
- Q2. What is the justification for the requirement for Nationally Described Space standards in Policy H16?
- Q3. Are Policies H13 and H16 positively prepared, justified, effective and where relevant, consistent with national planning policy?
- Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 6 – Accessible Homes – Policy H14

- Q1. How has the requirement that 10% of affordable homes should be built to meet wheelchair user and accessible and adaptable standards, as set out in Policy H14, been established as part of the plan-making process? Is it based on robust, up to date evidence?
- Q2. Based on the number of housing sites allocated in the Local Plan (without planning permission) how many wheelchair adaptable dwellings are expected to be provided? How does this compare to the identified need?
- Q3. What is the justification for the thresholds in Policy H14 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?
- Q4. Does Policy H14 consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, as required by the PPG¹²?
- Q5. What is the justification for the suggested modifications to Policy H14? Why are they necessary for soundness?

¹² Paragraph: 008 Reference ID: 56-008-20160519

Issue 7 - Housing Density and Mix – Policy H15

- Q1. Is Policy H15 sufficiently clear in relation to the types of housing to be provided and the housing mix expected? Is it effective in these regards?
10. The Exeter Density Study¹³ recommends densities between 50 and 150 dwellings per hectare for residential development depending on locational and other 'drivers of density' such as increasing the population within the city centre and proximity to public transport nodes and strategic cycle routes.
- Q2. What are the implications of this drive towards higher densities in Exeter? Would this approach lead to more tall buildings within the city? If so, should the Plan include a tall buildings policy? How has the Exeter Skyline Study¹⁴ been considered in formulating this approach?
- Q3. Is Policy H15 sufficiently clear in relation to what is expected of the density of development and what the implications of higher densities could potentially be? Should it include a minimum density standard for city and town centres and other locations that are well served by public transport as per paragraph 129 of the Framework?
- Q4. Is the delivery of Policy H15 over-reliant on the provision of flatted accommodation? How much of this type of accommodation been delivered in the city in the last five to ten years?
- Q5. Is Policy H15 positively prepared, justified, effective and consistent with national planning policy?
- Q6. What is the justification for the suggested modifications to Policy H15? Why are they necessary for soundness?

¹³ Evidence Base Document EVB-H-08

¹⁴ Evidence Base Document EVB-HH-02

Matter 8 – Regeneration, Employment and Economic Development

Issue 1 – Regeneration Opportunity Areas – Policy H3

- Q1. What are Regeneration Opportunity Areas and what is the justification for their inclusion in the Plan?
- Q2. How do they differ from site allocations and what were the reasons for not allocating land in the same way as other sites in the Plan? How were the sites identified? Were alternatives considered and/or discounted?
- Q3. How are the sites expected to come forward? How would a decision-maker be expected to react to a proposal for a smaller form of development, on individual sites within larger regeneration areas?
- Q4. Would the development of the Regeneration Opportunity Areas result in the loss of employment land? If not, how would this be ensured? Is the policy effective in this regard?
- Q5. Is the strategic approach of focussing regeneration development on brownfield land justified? Has this approach been adequately tested to ensure it is viable and deliverable? What adequate reasonable alternatives have been considered?
- Q6. Is Policy H3 intended to set out development requirements in the same way as site allocation policies?
- Q7. Will the policies in the Plan be effective in securing the regeneration of areas identified under Policy H3, or are they intended to guide proposals for redevelopment as and when they come forward?
- Q8. Are the requirements set out in Policy H3 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q9. What is the justification for the suggested modification to Policy H3? Why is it necessary for soundness?

Issue 2 – Employment land – Policy EJ2

- Q1. How would Policy EJ2 ensure that employment land would not be lost because of other types of development within the identified Regeneration Opportunity Areas or within the Strategic Mixed Use Brownfield Allocations? Is the policy effective in this regard?
- Q2. Is Policy EJ2 positively prepared, justified, effective and consistent with national planning policy?
- Q3. What is the justification for the suggested modification to Policy EJ2? Why is it necessary for soundness?

Issue 3 – Employment Provision and Local Services – Policies EJ3 and EJ5

- Q1. Is Policy EJ3 consistent with paragraph 88 of the Framework, which requires planning policies to enable the sustainable growth and expansion of all types of business in the rural areas, both through conversion of existing buildings also well-designed new buildings?
- Q2. Is Policy EJ3 positively prepared, justified, effective and consistent with national planning policy?
- Q3. What is the justification for the suggested modification to Policy EJ3? Why is it necessary for soundness?
- Q4. Is Policy EJ5 positively prepared, justified, effective and consistent with national planning policy?
- Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 4 – Access to Jobs and Skills – Policy EJ4

- Q1. Policy EJ4 requires all major development proposals to submit, and deliver the provisions in, an Employment and Skills Plan to demonstrate that the policy's objectives have been met? What is the justification for this approach?
- Q2. Is Policy EJ4 positively prepared, justified in all other respects, effective and consistent with national planning policy?

Q3. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 5 - New Transformational Employment Allocations – Policy EJ6

Q1. What are Transformational Employment Sites and what is the justification for their inclusion in the Plan?

Q2. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

Q3. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were potential impacts on heritage assets considered as part of this process?

Q4. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

Q5. Paragraph 7.32 states that a masterplan/Supplementary Planning Document (SPD) will be prepared by the City Council and the University to guide the proposals for the St Luke's Campus site which will sit alongside the 2010 University of Exeter Streatham Campus Masterplan Framework SPD. Is it appropriate to defer decisions over the use and scale of future development to a masterplan/SPD, which would not be subject to examination in the same way as a development plan document?

Q6. Is it clear to decision-makers, developers and local communities what will be provided and where across each of the sites identified by Policy EJ6?

Q7. What is the justification for the suggested modification to Policy EJ6? Why is it necessary for soundness?

Matter 9 – Site Allocations

Issue 1 - Housing Allocations and Windfalls – Policy H2

- Q1. Do the proposed residential site allocations incorporate all types of housing? What is the latest position regarding planning approvals and construction timeframes for these sites?
- Q2. How were different sites considered for inclusion as residential allocations? What process did the Council follow in deciding which sites to allocate?
- Q3. How did the Council consider the infrastructure requirements of the growth proposed in the Plan and how did this inform the site selection process?
- Q4. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were issues such as flood risk considered?
- Q5. How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield sites like Water Lane? What differentiates Water Lane from Marsh Barton which was removed as a housing allocation to instead be a Regeneration Opportunity Area?
- Q6. How did the Exeter Skyline Study¹⁵ and Exeter Density Study¹⁶ inform the site selection process, especially for sites within the city centre? Did the removal of large housing allocations such as Marsh Barton have any implications in terms of density assumptions for the remaining residential allocations? If so, what is the justification for this approach?
- Q7. Is the Exeter Plan's windfall allowance justified and supported by compelling evidence? How would housing development on unallocated sites outside of the urban area be dealt with? Is the policy sufficiently clear in this regard to be effective?
- Q8. What is the justification for the suggested modifications to the supporting text to Policy H2? Why are they necessary for soundness?

¹⁵ Evidence Base Document EVB-HH-02

¹⁶ Evidence Base Document EVB-H-08

Issue 2 – Strategic Mixed Use Brownfield Allocations – Policies SBA1, SBA2, SBA3, SBA4 and SBA5

Generic Questions

- Q1. Would the development of the Strategic Mixed Use Brownfield Allocations result in the loss of employment land? If not, how would this be ensured? Are the policies effective in this regard?
- Q2. What is the latest position regarding planning approvals and construction timeframes for each of the sites?
- Q3. Is it clear to decision-makers, developers and local communities what will be provided and where across each of the sites?
- Q4. How have the Exeter Skyline and Exeter Density studies been considered in formulating Policies SBA1 to SBA5?
- Q5. Is it realistic to expect self-build and custom-build homes to come forward at the densities proposed on each of the sites?
- Q6. Are Policies SBA1 to SBA5 sufficiently flexible for them to be effective?

Policy SBA1 – Water Lane

- Q1. Is the site all within the same ownership? Is it deliverable in the form allocated in the Plan?
- Q2. Is it appropriate to defer details relating to the amount and distribution of development to a Supplementary Planning Document ('SPD')?
- Q3. Is Policy SBA1 effective and justified by including a requirement for developments to accord with an SPD?
- Q4. How does the proposed capacity of around 1,861 homes relate to the Liveable Water Lane SPD? Is this figure broadly consistent with it?
- Q5. Is the policy sufficiently clear in terms of what types and quantities of housing will be provided? Is Policy SBA1 effective in this regard?
- Q6. According to Policy SBA1 the proposed housing would be at a density of about 51 dwellings per hectare. What would this mean for the height

and built form of any new residential development brought forward on the site?

- Q7. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?
- Q8. What effect will the allocation have on the safe and efficient operation of the highway network?
- Q9. What effect will the allocation have on flood risk?
- Q10. Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements?
- Q11. Are the requirements set out in Policy SBA1 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q12. What is the justification for the suggested modifications to the Policy SBA1 and its supporting text? Why are they necessary for soundness?

Policy SBA2 – East Gate

- Q1. According to Policy SBA2 the proposed housing would be at a density of about 101 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?
- Q2. What sort of retail is envisaged at this site and how consistent is this with other policies in the plan and the Framework? Is the proposed scale of retail development appropriate and justified?
- Q3. What effect will the allocation have on the character of the area, having particular regard to heritage assets?
- Q4. What effect will the allocation have on archaeology?
- Q5. Is it clear to decision-makers, developers and local communities what will be provided and where across the site? Is the policy sufficiently clear in terms of what types and quantities of housing will be provided? Is Policy SBA2 effective in these regards?

- Q6. Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as police infrastructure?
- Q7. Is it sufficiently clear what the delivery of 'an impressive and memorable city centre gateway' entails? Is the policy effective?
- Q8. Are the requirements set out in Policy SBA2 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q9. What is the justification for the suggested modifications to the Policy SBA2 and its supporting text? Why are they necessary for soundness?

Policy SBA3 - Red Cow

- Q1. According to Policy SBA3 the proposed housing would be at a density of about 116 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?
- Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets such as St David's station?
- Q3. Is it clear to decision-makers, developers and local communities what will be provided and where across the site? Is the policy sufficiently clear in terms of what types and quantities of housing will be provided? Is Policy SBA3 effective in these regards?
- Q4. What effect will the allocation have on the living conditions of future residents particularly in terms of railway noise? How has this been considered?
- Q5. What effect will the allocation have on the amount of available employment land in Exeter?
- Q6. How have proposals for the site (either through the approval of planning permission or allocation in the Local Plan) considered impacts on existing level crossings?

- Q7. Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as railway crossings?
- Q8. Is it sufficiently clear what the delivery of 'an impressive and memorable city centre gateway' entails? Is the policy effective?
- Q9. Are the requirements set out in Policy SBA3 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q10. What is the justification for the suggested modifications to the Policy SBA3 and its supporting text? Why are they necessary for soundness?

Policy SBA4 - Exe Bridges Retail Park

- Q1. According to Policy SBA4 the proposed housing would be at a density of about 112 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?
- Q10. What sort of retail is envisaged at this site and how consistent is this with other policies in the plan and the Framework? Is the proposed scale of retail development appropriate and justified? What is the justification for maintaining a continuous retail function on the site?
- Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?
- Q3. Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements?
- Q4. Are the requirements set out in Policy SBA4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q5. What is the justification for the site not being developed until the second half of the Plan period, beyond 2030?
- Q6. What is the justification for the suggested modifications to the Policy SBA4 and its supporting text? Why are they necessary for soundness?

Policy SBA5 - South Gate (Strategic policy)

- Q1. According to Policy SBA5 the proposed housing would be at a density of about 54 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?
- Q2. What effect will the allocation have on the character of the area, having particular regard to heritage assets?
- Q3. What effect will the allocation have on archaeology?
- Q4. Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as education?
- Q5. Are the requirements set out in Policy SBA5 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q6. What is the justification for the suggested modifications to the Policy SBA5 and its supporting text? Why are they necessary for soundness?

Issue 3 – Topsham Infrastructure Delivery Framework – Policy TI1

- Q1. How do the site boundaries and locations of the proposed site allocations in Topsham relate to possible development proposals in the emerging East Devon District Local Plan?
- Q2. Is it sufficiently clear in Policy TI1 which of the proposed residential allocations in the Plan would complement the possible development proposals in the emerging East Devon District Local Plan and contribute to the Topsham Infrastructure Delivery Framework (TIDF) and how they would do this?
- Q3. What effect would the possible development proposals in the emerging East Devon District Local Plan have on the proposed spatial strategy and the proposed levels of growth for Exeter? How have any potential implications been considered?
- Q4. Is the need for the TIDF justified, consistent with national planning policy and based on robust, up to date evidence?

- Q5. Are the requirements set out in Policy TI1 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q6. How would the TIDF guide development proposals in Topsham over the plan period? Is it clear to decision-makers, developers and local communities what will be provided and where across the area? Is the policy sufficiently clear in terms of what types and quantities of development, infrastructure and facilities will be provided? Is Policy TI1 effective in these regards?
- Q7. What is the justification for the suggested modifications to Policy TI1? Why are they necessary for soundness?

Matter 10 – Transport, Travel and Communications

- Q1. Has the preparation of the Local Plan been consistent with paragraph 108 of the Framework, which states that transport issues should be considered at the earliest stages of plan-making?
- Q2. How has the Greater Exeter Transport Study and other key transport policy documents such as the Local Transport Plan and Exeter Transport Strategy been considered in the preparation of the Local Plan?

Issue 1 – Sustainable Movement, Travel and Public Transport – Policies STC1, STC2, STC3, STC4, STC5 and STC6

- Q1. How will the outcomes set out in Policy STC1 be implemented? Have these outcomes been adequately tested to ensure that they are viable and deliverable?
- Q2. How has transport-related social exclusion been considered in the formulation of Policy STC1?
- Q3. How have ecological connectivity and flood risk been considered in the formulation of Policy STC3?
- Q4. How would the mobility hubs required by Policy STC4 be delivered?
- Q5. Are the requirements for major development set out in policies STC3 and STC4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- Q6. How has access for emergency vehicles; carers; health visitors; medical professionals; social workers or others who need to use their cars and to park near where they are visiting been considered in the formulation of Policy STC5?
- Q7. Are policies STC1, STC2, STC3, STC4, STC5 and STC6 positively prepared, justified, effective and consistent with national planning policy?
- Q8. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Transport Infrastructure, Motorways and Digital Communications – Policies STC7, STC8 and STC9

- Q1. Where strategic highway improvements have been identified as necessary, what amount of development can come forward in advance of their implementation? How has this been considered in the Council's Housing Trajectory?
- Q2. How have the effects of development on the non-strategic (local) highway network been assessed as part of the plan-making process? Where highway mitigation is required, where is this set out and how will it be achieved?
- Q3. Should the disused railway line across the Marsh Barton site be included in Policy STC7?
- Q4. What impact would the development of a new Motorway Service Area as supported by Policy STC8 have on junction 30 of the M5? What effect will the new service area have on the safe and efficient operation of the highway network?
- Q5. How would the development of improved digital communications as per Policy STC9 help to achieve net zero in Exeter by 2030?
- Q6. Are the requirements set out in policies STC7, STC8 and STC9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q7. Are policies STC7, STC8 and STC9 positively prepared, justified, effective and consistent with national planning policy?

Q8. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 11 – Natural Environment

Issue 1 – Landscape Setting Areas and Valley Parks – Policies NE1 and NE2

- Q1. What are Landscape Setting Areas and Valley Parks and what is the justification for their inclusion in the Plan?
- Q2. How do they differ from site allocations? How were the areas and parks identified? Were alternatives considered and/or discounted?
- Q3. How would the Landscape Setting Areas and Valley Parks designations be expected to operate? How would a decision-maker be expected to react to a proposal for development within one of these locations?
- Q4. Would all the Landscape Setting Areas and Valley Parks identified by Policies NE1 and NE2 be classified as 'valued landscapes' for the purposes of paragraph 180 a) of the Framework? If so, what is the evidence to justify this approach?
- Q5. Are the requirements set out in policies NE1 and NE2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?
- Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Biodiversity and Green Infrastructure – Policies NE3 and NE4

- Q1. What is the justification for the biodiversity net gain requirement in Policy NE3? What information is available to demonstrate that the target can be achieved? Has this requirement been adequately tested to ensure that it is viable and deliverable?
- Q2. Are the requirements set out in policies NE3 and NE4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Q3. Are policies NE3 and NE4 positively prepared, justified, effective and consistent with national planning policy?

Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 3 - Green Circle, Urban Greening and Trees - Policies NE5, NE6 and NE7

Q1. Are the requirements set out in policies NE6 and NE7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

Q2. Are policies NE5, NE6 and NE7 positively prepared, justified, effective and consistent with national planning policy?

Q3. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 12 – Historic Environment, Culture and Tourism

Issue 1 – History and Heritage – Policies HH1, HH2, HH3, HH4 and HH5

Q1. Are the Plan's heritage policies consistent with the approach to conserving heritage assets in the Framework, having particular regard to the tests in paragraphs 206-209?

Q2. Are policies HH1, HH2, HH3, HH4 and HH5 positively prepared, justified, effective and consistent with national planning policy?

Q3. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Culture and Tourism – Policies C1 and C2

Q1. What is the difference between development that would have 'unacceptable impacts on local amenity' and development that would 'not significantly harm local amenity' in Policy C1? Is the policy sufficiently clear in these regards to be effective?

Q2. Is it sufficiently clear what is meant by 'large scale development' for the purposes of Policy C2? How will the policy be implemented and how will it be effective?

- Q3. What is a Cultural Plan and what is the justification for the requirement for one to be submitted with a qualifying development proposal in Policy C2? Could a Cultural Plan ever be required for other scales of development? Is the policy effective?
- Q4. Is it clear to users of the Plan how all development proposals would be 'sensitive and sympathetic to local identity and cultural practices' under Policy C2? Is the policy effective in this regard?
- Q5. Are policies C1 and C2 positively prepared, justified, effective and consistent with national planning policy?
- Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Matter 13 – Design, Health and Wellbeing

Issue 1 – Design and Advertisements – Policies D1, D2 and D3

- Q1. Is it sufficiently clear what is meant by 'appropriate densities, massing and building heights' and 'reinstate former street patterns' for the purposes of Policy D1? How will these elements of the policy be implemented and how will it be effective in these regards?
- Q2. Is it sufficiently clear to users of the Plan what a comprehensive response to existing site constraints, utilities and infrastructure provision would entail?
- Q3. Do all developments need to provide high quality public realm and landscape design, making appropriate provision for public art and cultural activity as an integral part of the proposal?
- Q4. Is Policy D1 effective and justified by including references to supplementary planning documents and guidance?
- Q5. Are policies D1, D2 and D3 positively prepared, justified, effective and consistent with national planning policy?
- Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Health, Wellbeing, the Environment and Pollution - Policies HW1 and HW2

- Q1. Is Policy HW1 justified, effective and consistent with paragraph 96 of the Framework, which requires planning policies to aim to achieve healthy, inclusive and safe places?
- Q2. Would a separate Health Impact Assessment be necessary for all site allocations? If so, would this requirement consistent with Public Health England Guidance¹⁷ which advises that health impact assessments are a useful tool to use where there are expected to be *significant* impacts?
- Q3. Is it sufficiently clear what is meant by 'large scale development' for the purposes of Policy HW1? How will the policy be implemented and how will it be effective in this regard?
- Q4. Is Policy HW1 sufficiently clear how any potential adverse health and wellbeing impacts from residential or other development that is not 'large scale' would be dealt with? Is the policy effective in this regard?
- Q5. Is the evidence to support contributions towards GP provision sufficiently robust to ensure it meets the tests for planning obligations?
- Q6. How has access to secondary healthcare been considered? Would any secondary healthcare contributions also be required?
- Q7. Is criterion e) of Policy HW1 necessary? Is this element already covered by Policy D2?
- Q8. Are the requirements set out in policies HW1 and HW2 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable? How will they be funded?
- Q9. Are policies HW1 and HW2 positively prepared, justified, effective and consistent with national planning policy?
- Q10. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

¹⁷ Health Impact Assessment in spatial planning - A guide for local authority public health and planning teams 2020

Matter 14 – Infrastructure, Facilities and Viability

Issue 1 – Delivery of Infrastructure – Policy IF1

- Q1. Is the Plan consistent with paragraph 20 of the Framework, which states that strategic policies should make sufficient provision for, amongst other things, new infrastructure including community facilities such as health and education?
- Q2. How will primary and secondary education be provided for effectively? Will the allocation at Water Lane (SBA1) deliver a new primary school? Is Policy IF1 positively prepared, justified, effective and consistent with national policy, in particular paragraphs 20 and 22 of the Framework?
- Q3. Are the assumptions regarding infrastructure projects, delivery mechanisms and funding sources outlined in the table within the Infrastructure Delivery Plan (IDP) still broadly accurate? What implications, if any, does the latest evidence in the IDP have on the viability of development and the ability to deliver it?
- Q4. Why are infrastructure phasing plans required for large scale residential development and not for other development? Is the Policy IF1 justified and effective in this regard?
- Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 2 – Viability – Policy IF2

11. The PPG¹⁸ advises that the role for viability assessment is “...at the plan making stage”. It also states that Plans should set out the contributions expected from development. This should include the level and type of affordable housing provision required, along with other infrastructure. These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards.
12. The Local Plan Viability Assessment¹⁹ (LPVA) identifies three zones (VA1, VA2 and VA3) across Exeter where different house prices are achieved. Reflecting the viability of new residential development, this is translated into different levels of planned housing delivery in these different zones with the majority (75%) being in zone VA1 on brownfield land i.e. on the Strategic Brownfield Allocations, 19%

¹⁸ Paragraph: 002 Reference ID: 10-002-20190509 and Paragraph: 001 Reference ID: 10-001-20190509

¹⁹ Document EVB-IF-01a

being in zone VA2 on greenfield land with the remainder (6%) being in zone VA3 on a mixture of greenfield and brownfield land with the largest allocation being brownfield.

- Q1. How were the zones defined and are they accurate and appropriate? How were the affordable housing assumptions determined for the viability testing for each zone? How was the 75% level of planned housing delivery for zone VA1 determined? Could residential development in Zone VA1 viably contribute more affordable housing?
- Q2. Does the LPVA and its addendum report²⁰ accurately account for all likely development costs, from contributions towards healthcare and education to site specific design costs such as higher optional technical standards?
- Q3. Does the LPVA differentiate between greenfield and brownfield sites, and if so, how is this reflected in the Plan?
- Q4. Does the LPVA differentiate between strategic and non-strategic site allocations, and if so, how is this reflected in the Plan? Have all the proposed site allocations in the Plan been subjected to viability testing?
- Q5. When taking into account the need for and cost of likely development contributions, will the policies in the Local Plan undermine its deliverability?
- Q6. How would the viability exemption set out in Policy IF2 work in practice if there were no significant changes as set out under criteria a, b and c? Is this approach consistent with national planning policy?
- Q7. How would the review mechanism under Policy IF2 work in practice? What is the justification for its inclusion in the Plan? Would it apply to all development?
- Q8. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

²⁰ Document EVB-IF-01b

Issue 3 – Community Facilities - Policy IF3

- Q1. Is Policy IF3 consistent with paragraph 97 of the Framework which, amongst other things, requires planning policies to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs?
- Q2. Is it clear to decision-makers, developers and local communities what types of use constitute 'community facilities', particularly in relation to commercial operations?
- Q3. Is it clear to decision-makers, developers and local communities how the policy will be implemented effectively?
- Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Issue 4 – Open Space, Play Areas, Allotments and Sport – Policy IF4

- Q1. How is open space defined for the purposes of Policy IF4?
- Q2. Is Policy IF4 consistent with paragraph 103 of the Framework, which states that existing open space, sport and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met?
- Q3. The Exeter Playing Pitch Strategy²¹ is a draft document dated October 2022. Has this work been updated as part of the Plan's preparation? If not is this evidence now out of date?
- Q4. How have the requirements in Policy IF4 been established as part of the plan-making process? Are they based on robust, up to date evidence? Have the requirements been adequately tested to ensure that they are viable and deliverable?
- Q5. Is Policy IF4 consistent with paragraph 106 of the Framework, which sets out when Local Green Space designations should be used?
- Q6. Is Policy IF4 effective and justified by including a requirement for developments to accord with an SPD?

²¹ Document EVB-IF-03

Q7. Is it clear to decision-makers, developers and local communities how the policy will be implemented effectively?

Q8. What is the justification for the suggested modifications to Policy IF4? Why are they necessary for soundness?

Issue 5 – New Cemetery Provision – Policy IF5

Q1. If there is an identified need for new cemeteries to be provided, should relevant allocations be included in the Plan?

Q2. Is Policy IF5 positively prepared, justified, effective and consistent with national planning policy?

Matter 15 – Monitoring and Implementation

Issue 1 – Monitoring and Implementation

Q1. Will the Council's monitoring and review processes for the Plan be effective in assessing the success or failure of delivery and what alternatives might reasonably be provided if necessary?

End.