

Appendix 26:



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15th January 2024

By Email Only

Dear Sir/ Madam

MLPD 17001 On Behalf of The Pratt Group Regulation 18 Representations to Supplement Representations Made to The Exeter Plan Outline Draft Consultation

Introduction

1. On behalf of our client, The Pratt Group, we submit Regulation 18 representations to “The Exeter Plan” which supplement previous representations made in December 2022 to the “Draft” plan.
2. Our client’s land is located in Exeter and is relevant to Exeter’s “Vision” and policies.
3. Some of its land is proposed for allocation:
 1. 350 houses; Old Rydon Lane; Site 89
 2. 7 Ha employment land; Sandy Park; Site 140
 3. 4 Ha employment land; Newcourt; Site 136

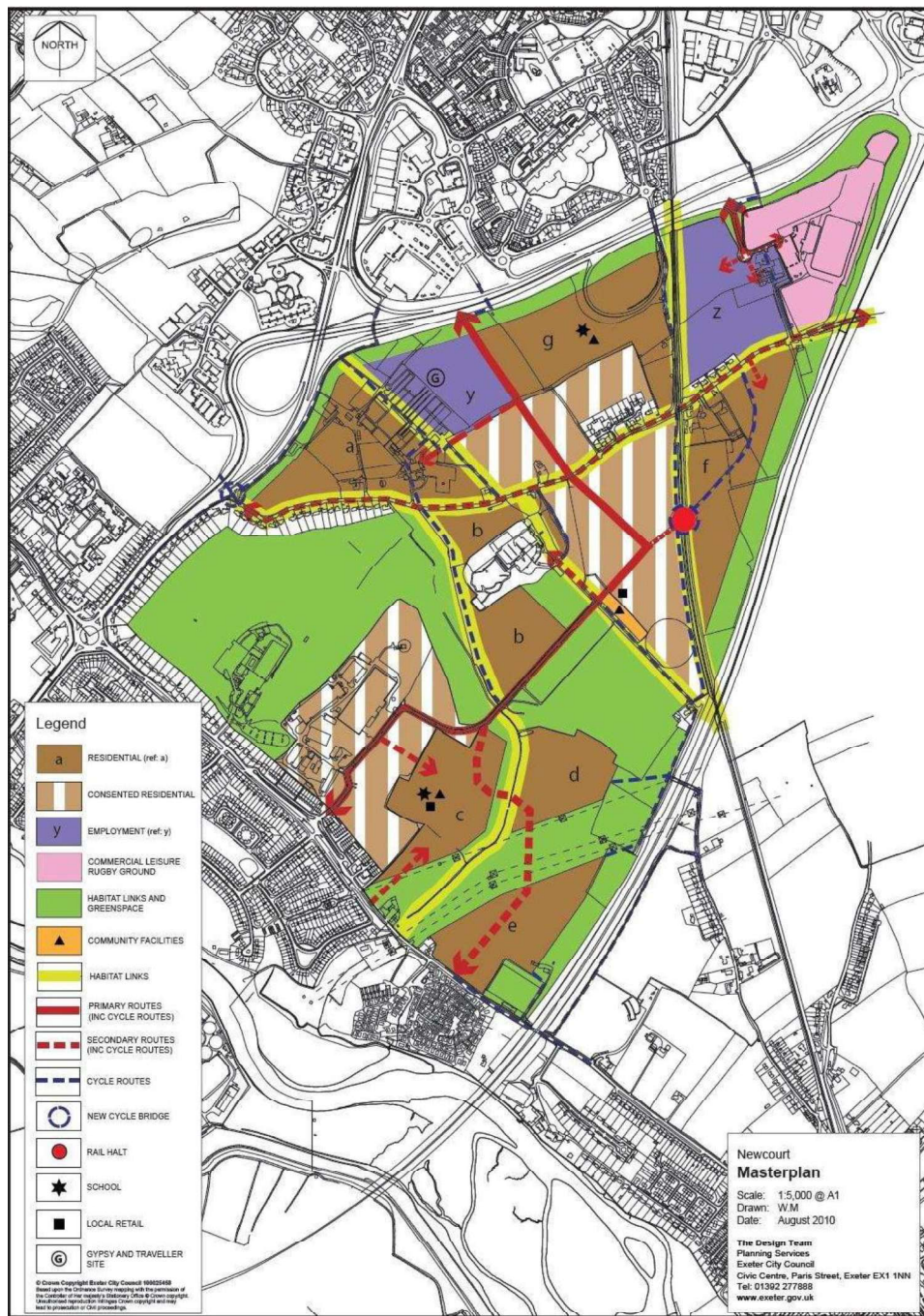
Notes

- i. Sites 89 and 140 are closely related.
- ii. Site 136 and the St Bridget site (Previously allocated for 350 houses; St Bridget; Site 83; now shown as unallocated) are closely related.

4. Our client broadly endorses the allocations but makes specific comments below that will have to be addressed by Exeter City Council.
5. Our client's comments are split to deal with:
 1. Sites 89 and 140 which we will call "Land at Sandy Park Farm",
 2. Site 136 and the St Bridget Site which we will call "Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way".
6. Holistically, the plan has not changed, and our client stands by their previous comments. Consequently, please read the representations now made in conjunction with our December 2022 comments (and comments made in 2021).

Our Client's Landholdings

7. Our client's land is suitable and available to meet Exeter's housing and employment needs broadly in line with the issues it faces and its "Vision" papers.
8. All of it is allocated for development in the Core Strategy and is proposed for allocation in the emerging plan.
9. The land tranches are significant and are all free of restrictive planning constraints. Located to the east of the city they are part of the Newcourt urban extension to Exeter.
10. Policy identifies Newcourt as a location for an urban extension and a sustainable location for housing and employment development, in line with best planning practice of focusing growth where the vast majority of physical, social and community and green infrastructure exists or is planned for.



Newcourt Masterplan

1. Land at Sandy Park Farm

11. Our client's application (14/1451/OUT) to the south of Old Rydon Lane and to the west of the M5, on land in the adopted Newcourt Masterplan, for up to 392 residential dwellings and associated infrastructure, benefits from a resolution to grant planning permission, and is in the Council's housing growth figures. It is Site 89.
12. Our client has submitted a "sister" planning application immediately to the north of Old Rydon Lane for mixed-use development. It is Site 140. The Planning Statement, for that application is attached as an Appendix 4. Section 3 of that statement, in particular refers. It states:

"Site and Surroundings

- 3.1 *The site is located on the eastern edge of Exeter (See Maps 1-8) north of Old Rydon Lane and to the west of the M5. The Exeter to Exmouth railway line runs adjacent to the western boundary. To the north is Sandy Park Way and the A379. To the East is Sandy Park Stadium and David Lloyd Leisure. To the south-east is the new Marriott Courtyard hotel. The site is on a slight south facing slope and it comprises lower grade agricultural land.*
- 3.2 *Further east, beyond the M5 motorway the land falls to the Clyst Valley, which is characterised by rolling farmland falling to the River Clyst, which meanders through its floodplain. Native hedgerows form field boundaries and there are loose groups of native and non-native mature trees predominately on field boundaries and in the grounds of existing properties.*
- 3.3 *Irregularly shaped, predominantly arable farmland (still farmed) with nine dwellings of previously converted farmhouses/barns, outlying barns and sheds and a small commercial premises of offices and stores with hardstanding/storage areas (the existing dwellings are occupied as is the commercial premises), the application site is located near to Junction 30 (J30) of the M5 Motorway.*
- 3.4 *Allocated as part of the Newcourt area strategic development allocation, the scheme evolution has considered existing and proposed developments (i.e. built and permitted developments) and responds to its context, representing best practice in the design of mixed-use environments, fully according with National planning policy and existing and emerging local planning policies.*

- 3.5 *Following the principles of the Newcourt area Masterplan, it would deliver high quality, much needed, development on an allocated site, by bringing forward a housing and employment led mixed use scheme with supporting local facilities, creating jobs within the Newcourt Urban Extension, all of which is enshrined in existing and emerging policies.*
- 3.6 *The land immediately to the south of the site is under the same ownership. This land together with land owned by others benefits from a Resolution to Grant (RTG) Planning Permission for up to 392 residential dwellings with associated infrastructure subject to a Section 106 Agreement (Planning Reference: 14/1451/OUT). (Site 89; see below). This application (on Site 140; see below) together with the RTG site (14/1451) would form a cohesive and coordinated development “finishing off” the Newcourt extension at its eastern edge. Our client’s representations to the emerging Local Plan will make these points, too.*
- 3.7 *The proposal is in a highly sustainable location within the City and is within close proximity to the nearby Digby Halt and Newcourt railway stations, retail, employment, and educational facilities, all of which are within walking distance. Beyond the immediate boundaries, the site is broadly surrounded by new development including;*
- The Newcourt residential areas are located to the west with IKEA and King’s Heath to the north-west.*
 - To the north is the residential area at Apple Lane with Digby Halt station and Sowton Industrial Estate beyond.*
 - To the East is the M5 motorway, Clyst Road and East Devon.*
 - To the south-east is the Marriott Courtyard hotel.*
 - To the south-west is Newcourt railway station.*
 - Fields to the south of Old Rydon Lane below the site have received a Resolution to Grant Planning Permission for residential use (392 dwellings).*
- 3.8 *Exeter City Council’s emerging Local Plan Full Draft Oct 2023 reflects the Newcourt Masterplan and calls the application site “Site 140”. It calls the land to the south of Old Rydon Lane “Site 89” (this is the land that benefits from a RTG for*

392 dwellings). (See Map 6 below. “Site Location” is “Application Site” and “Site 140”; and “Southern Parcel” is “14/1451” and “RTG site” and “Site 89”)



Map 6 (From Transport Assessment SLR)

- 3.9 Site 140 and Site 89 are allocated for employment uses (Policy EJ6) and residential uses respectively in emerging policies. Policy EJ5 supports provision of local services within employment areas. To create a serviced, supported, vibrant and sustainable neighbourhood, a mix of uses together with employment is proposed hence this proposal. Access from the A379 to site 89 would require a new spine road which would bisect site 140.
- 3.10 The David Lloyd Leisure Centre and Sandy Park stadium are modern, clad, large building forms with extensive paved areas. The recently built 8 storey Marriott hotel dominates the skyline in the vicinity and beyond. These structures and associated works in particular affect the site’s setting. Especially, given that the scale and massing of this recently built hotel adjacent to the site would adversely impact the provision of dwellings immediately to the west (on Site 89) the Masterplan has had to evolve, and it is better from a planning perspective to deliver mixed use development immediately west of the dominant mass of the

Marriott, to help break up and reduce the impacts that it would have. Furthermore, it is better to develop housing to the west of the new spine road with the mixed use/employment to the east and north. In essence, though our client is cognisant of blight and purchase notice procedures, it wants to work with the Council, to deliver high quality spaces for the City. Map 7 below, refers.



Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account

3.11 *Clearly, all of the foregoing, shows that Newcourt is an area in transition. Whilst the site itself is agricultural in nature, the surrounding area has changed dramatically in character over recent years. Since 2000, the Newcourt area has been developed from a semi-rural area into a successful and sustainable urban extension of Exeter. “*

Land at Sandy Park Farm Requested Changes to the Plan

13. The foregoing has led to an advanced Illustrative Masterplan for land to the north of Old Rydon Lane.



Illustrative Masterplan

14. Our client respectfully asks the Council to make changes to the plan (text and proposals map) in line with the foregoing text and the recently submitted planning application.

15. The plan (text and proposals map) should be amended to show land to the north and south of Old Rydon Lane as one allocation for C14.5 Ha of residential development (C 600 homes) and C5.5 Ha of mixed use development (190,000 sq. ft of commercial development) with associated infrastructure in line with “*Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account*”, above.

2. Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way

16. Our client fails to understand why its land is allocated and land at St Bridget is now shown as unallocated land, especially when all of the land is allocated, the City is struggling to identify and allocate enough housing and employment land to meet its needs, and when there is an existing application for housing on St Bridget land.

17. On the face of it, it looks like an attempt to ensure that the St Bridget site does not need to make the proper and safe connection to Newcourt Way in line with the Council’s adopted Newcourt Masterplan.

18. But a main reason for the Newcourt Masterplan is to ensure that the proper connections are used to benefit existing and future citizens and that land bears an appropriate burden for infrastructure paid for and provided sometimes by others. Subsequent Exeter City Council policies bolster this.

19. The GESP Brownfield Sites Study (Please see Ref A below) of 2018 clearly indicates access for St. Bridget’s should be via the Newcourt Way roundabout:

“Access – Primary access to the Nursery site is currently achieved via two priority junctions along Old Rydon Lane. Old Rydon Lane is a 5.5m wide local distributor road which takes the form of a country lane. As such, it is considered that Old Rydon Lane could only be used as an access route for a small quantum of housing (or secondary / emergency access) to the site.

Dependent on land availability and ownership, a new primary access would need to be achieved from the four-arm roundabout on Newcourt Way. An access spur from this roundabout has already been constructed. This would avoid the potential width and capacity constraint”

20. The Exeter Plan Consultation draft (Please see Ref B3 below) indicates access to St Bridget's (Site Ref 83) should be from the Newcourt Way roundabout.
21. The HELAA (Please Ref C below) also highlights Newcourt Way roundabout as the primary access for St. Bridget's (Please see Ref C p368 to p372).
22. It follows that any planning application made on St Bridget's should include access from the Newcourt Way roundabout and that such an access should continue to be enshrined in policy making. The plan, backed by clear evidence, should be corrected in this vein.
23. In simple terms the Council can try to grant permission for a substandard residential development at St Bridget's that will negatively affect existing and future residents of the City and all users of the highways network, public transport systems and green infrastructure. Or it can direct St Bridget landowners to utilise the proper connection the cost for which would be borne by the land, which is the right thing to do and is normal in a strategic Masterplan context.
24. In terms of proposed uses for its land our client firmly believes that they should be market driven and dependent upon whether St Bridget's connects, as it should, to Newcourt Way.

Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way Requested Changes to the Plan

25. Our client respectfully asks the Council to make changes to the plan (text and proposals map) to:
- allocate its land at Sandy Park Farm for mixed use and for C14.5 Ha of residential development (C 600 homes) and C5.5 Ha of mixed use development (190,000 sq. ft of commercial development) with associated infrastructure in line with "*Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account*", above; and,
 - follow on from **ALL** Newcourt policy making and allocate St Bridget land as part of a wider mixed use allocation together with its land ensuring that St Bridget utilises the proper and safe access onto Newcourt Way, to benefit existing and future residents of the City and all users of the highways network, public transport systems and green infrastructure.

If you require further information about specific aspects of the representations, please contact us at the above address.

Our client thanks you for the opportunity to comment on the Local Plan and looks forward to further positive dialogue as the “Exeter Plan” progresses.

Thank you.

Yours faithfully,

James

James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client; DCC

For The Pratt Group

References

A: Strategic Brownfield Sites Study, LDA Design, January 2018 (Appendix A)
<https://devoncc.sharepoint.com/:b:/s/PublicDocs/Planning/EZAUrP2zAcBDiqat7miaakRUBt0lrkxCUBR6H7Hrtaq9L-Q>

B1: Exeter Plan Consultation Draft –St Bridget’s Site
<https://exeterplan.commonplace.is/en-GB/proposals/st-bridget-nurseries/step1>

B2 Exeter Plan Consultation Draft –Sandy Gate Site 89
<https://exeterplan.commonplace.is/en-GB/proposals/sandy-gate/step1>

B3 Exeter Plan Consultation Draft –Economy and Jobs
<https://exeterplan.commonplace.is/en-GB/proposals/economy-jobs>

B4 Exeter Plan Consultation Draft –Proposed Site Allocations
<https://exeterplan.commonplace.is/en-GB/map/proposed-site-allocations-map>

C HELAA 2022 - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663756911/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Housing%20%2526%20Economic%20Land%20Availability%20Assessment.pdf/q7x9txyxy2m0xwner5vm.pdf>

D Exeter Employment Study - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663755462/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Employment%20Study.pdf/i9m02odkejwe6f5ebrop.pdf>

APPENDIX 1. AMENDED TABLE OF RESPONSES

Policies	Comment
S1: Spatial strategy	1. For the plan to be sound the Council should plan to build significantly more houses than 642 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) 2. The Exeter Employment Study suggests that 84ha of employment land is required to meet demand over the plan period. This Plan refers only to 'transformational sectors' and is silent on other employment uses. The needs of these other employment use, particularly industrial uses need to be addressed. 3. The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met. If the Plan is found to be sound in its current form, housing will be delivered on existing employment land and the displaced employment relocated. If the Plan is found to be unsound, additional land will need to be found for housing. In both scenarios it is reasonable to conclude that greenfield land will need to be released for development. Further, the Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. 4. To expect most of the development to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of

	such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing. 5. Noted and supported. It is however noted that this version of the plan as reduced the number of greenfield sites proposed since the publication of the Outline Draft Plan last year. Greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour. 6. Noted, and whilst largely supported, other forms of sustainable transport provision exist and should be acknowledged within the Plan. Further, if the Plan continues to pursue strategy which focuses on brownfield land, it must also acknowledge that brownfield sites in rural areas can also contribute to housing numbers noting the provisions of para.109 which recognises that sustainable transport solutions will vary between urban and rural areas. 7. The removal of reference to the sensitive hills 'to the north and north west of the city', presumably in light of recent appeal decisions, is noted. However, as with previous comments, land to the north of Exeter must not be arbitrarily protected, all sustainable and deliverable land must be considered. 8. Noted and supported.
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	9. Noted and whilst supported, Exeter is experiencing a significant shortage of both housing and employment land, such that it is important that this aim does not unnecessarily stifle development when impacts can be satisfactorily mitigated. 10. Noted and supported. 11. Noted and supported. 12. Noted and whilst supported, the term 'optimal' must be clarified. Further clarification is also needed to explain how this aim will sit alongside other requirements for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). 13. Noted and supported. 14. Consideration needs to be given as to how this may affect viability, particularly in light of the focus on brownfield sites.
S2: Liveable Exeter delivery principles	To expect most of the development to be sited on large, strategic brownfield sites is unrealistic, and greenfield land both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. Principle 1 and 2: The aim of making efficient use of land is noted and supported. This appears to correlate with the point about "optimal densities" and clarification will be required as to how this sits alongside the requirement for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). In addition, more space will be required for shared road networks, streets with street

furniture. All of which will add to the land take of development and potentially prevent a 'compact' development.

Principle 3:

The aim to provide a variety of high-quality homes and local jobs is noted and supported. However, the strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan is silent on industrial employment uses, particularly those that already exist in Exeter. The Plan does not show how such uses will sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. The Plan does not show how quality homes will be provided alongside noise and odour generating B2 and B8 uses.

Whilst policy HW2, which states that development proposals will only be permitted where they 'will not place unreasonable restrictions on the future operation of existing businesses', is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met.

Further, with a strong focus on the redevelopment of brownfield land for housing, it is unclear how this will impact the delivery of affordable housing in Exeter. Brownfield land is typically associated with abnormal costs, which will inevitably impact the viability of such land coming forward for housing development. Where viability implications exist this is likely to affect the delivery of affordable housing.

Principle 4:

	The provision of homes that are dual aspect will be more difficult for higher density developments such as flats/apartment blocks. It will be important to clarify which matter will take priority, higher density developments or dual aspect accommodation. Principle 5: Matters like cycle parking, storage, electric vehicle infrastructure, areas for play, food growing etc will need to be quantified and consideration given to how the provision of all these matters will affect the viability of developments.
CC1: Net zero Exeter	The Local Plan must prioritise development in sustainable locations to minimise car travel.
CC2: Renewable and low carbon energy	Noted and supported.
CC3: Local Energy Networks	Consideration needs to be given to how such measures will impact the viability of developments coming forward.
CC4: Ground mounted photovoltaic arrays	Whilst noted, preventing the development of solar arrays on land that is not classified as 3b, 4 or 5 without an assessment of all material considerations at the time of submission seems somewhat premature. The Plan includes a strong focus on lowering carbon emissions and renewable energy generation. To wholly restrict the use of other classifications of land at plan making stage appears to be at odds with this focus, when such matters can be considered on a case by case basis at decision making stage.

	Policy HH2 suggests that development proposals that result in any degree of harm to a heritage asset will only be permitted where the contribution to addressing climate change demonstrably outweighs the harm to the heritage asset. Similar wording would seem sensible here with reference to all classifications of agricultural land.
CC5: Future development standards	Noted.
CC6: Embodied carbon	Noted. Clarification is required to explain what level of information will be required to demonstrate that conversion/refurbishment is not viable/practical. This needs to be proportionate to the scale and extent of development, noting that this applies to only minor development.
CC7: Solar-ready development	Noted.
CC8: Flood risk	Noted and supported.
CC9: Water quantity and quality	Consideration needs to be given to how such contributions will impact the viability of developments coming forward.
H1: Housing requirement	For the plan to be sound the Council should plan to build significantly more houses than 642 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) The site allocation strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met. If the Plan is found to be sound in its current form, housing will be delivered on existing employment land and the displaced employment relocated. If the

	Plan is found to be unsound, additional land will need to be found for housing. In both scenarios it is reasonable to conclude that greenfield land will need to be released for development. Further, the Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. Whilst policy HW2, which states that development proposals will only be permitted where they 'will not place unreasonable restrictions on the future operation of existing businesses', is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met. To expect most of the development to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing. It is noted that this version of the plan as reduced the number of greenfield sites proposed since the publication of the Outline Draft Plan last year. Greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour.
H2: Housing allocations	See response for policy H1 and EJ2.

H3: Affordable Housing	The site allocation strategy for house building in Exeter relies heavily on the redevelopment of brownfield sites. To expect most of the housing requirement to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing.
H4: Build to rent	Noted.
H5: Co-living housing	Noted.
H6: Custom and self-build housing	This policy needs to be finalised to include figures for the number of homes which will be subject to a requirement custom and self-build housing and the percentage of homes available to custom housebuilders. Comments may be forthcoming following confirmation of these figures.
H7: Specialist accommodation	Noted.
H8: Purpose built student accommodation	Noted.
H9: Gypsy and traveller accommodation	Noted.
H10: Residential conversions and houses in multiple occupation	Noted.
H11: Loss of residential accommodation	The supporting text to this policy suggests that <i>'whilst there may be occasions where other material considerations warrant the loss of residential accommodation, policy H11</i>

	<i>will ensure that existing homes are retained in most cases</i> '. The policy however does not allow any deviation, suggesting that <i>'development proposals which result in a net loss of residential units will not be permitted'</i> . Should the Council accept that there will be circumstances which warrant a loss of residential accommodation, as it should, the policy should allow for this in the text.
H12: Accessible homes	Noted.
H13: Housing density and size mix	The aim of making best use of land is noted and supported. The policy states that development proposals will make the best use of land by optimising density taking account of the local context. However, paragraph 3.12 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area on most sites. These two aims/objectives appear at odds and must be clarified, to make clear in what circumstance developing above the surrounding density will be acceptable. The aim of making efficient use of land is noted and supported. This appears to correlate with the point about "optimal densities" and clarification will be required as to how this sits alongside the requirement for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). In addition, more space will be required for shared road networks, streets with street furniture. All of which will add to the land take of development and potentially prevent a 'compact' development.
H14: Residential amenity and healthy homes	The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. The Plan does not demonstrate how employment uses will successfully operate alongside residential dwellings without

	conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. This needs to be addressed at plan making stage. This policy suggests that provision to enable working from home will be a consideration for new housing development, it isn't however a direct requirement of this policy. This differs from supporting paragraphs to policy EJ3 which state that <i>'it will also be important for all new homes to include home offices or at least be designed in a way to facilitate home working'</i>. Further clarification on this point is required. If it is a direct requirement of this policy, such provision is likely to necessitate dwellings with larger floor areas. Whilst other policies in the plan refer to making efficient use of land, developing at optimum densities, and creating compact places, a requirement for larger dwellings at potentially lower densities may be at odds with other policy aims. Further the provision of larger homes is likely to have implications for affordability.
EJ1: Economic growth in the transformational sectors	The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met, not just for 'transformational sectors'.
EJ2: Retention of employment land	This policy states that the loss of employment land to alternative uses 'may be' acceptable where land is allocated for redevelopment (whereas the Outline Draft suggested the loss of such land 'will be' acceptable). Whilst this change is noted, it is minor and does not provide clarity of the circumstance in which such a loss would not be acceptable. Policy H2, by proposing the allocation of existing employment sites for residential redevelopment suggests the loss of employment uses in these locations is acceptable in principle. It is somewhat deceptive to suggest that the loss of employment

	could be discouraged in principle when other policies in the plan confirm the acceptability of its loss in principle through the allocation of such sites for residential uses. Policy H2 suggests that Marsh Barton, for example, will be a mixed-use site. Yet policy EJ2, by excluding Marsh Barton from the policy wording, suggests that the whole site has redevelopment potential to uses outside of employment uses. If the whole site were to be earmarked for redevelopment and came forward as a full residential proposal, this would have an even more damaging effect on employment land supply and jobs. Policy EJ2 would seem to allow a complete redevelopment of an employment site, which is not sustainable. If it is not the intention of policy EJ2 or policy H2 to allow the widespread loss of employment land at sites like Marsh Barton, both policies require further clarification. Further to the above, the partial redevelopment of employment land to mixed use residential schemes, may result in established business being forced to relocate due to pressure from nearby residents and impacts on amenity. Policy EJ2 may result in those sites earmarked for mixed uses by policy H2 being fully redeveloped for housing. The Outline Draft made reference to the acceptable loss of employment uses where such uses have an unacceptable amenity impact on residents, this had now been omitted. Whilst noted, the policy would still facilitate the widespread loss of employment land if allocated for redevelopment or where an employment use is deemed unviable (e.g. where additional restrictions are placed on operating business due to amenity concerns). This is a very real concern and will have implications for either housing land supply or employment land supply and needs to be addressed in the Plan.
EJ3: New forms of employment provision	Noted. This policy requires all strategic brownfield sites to include these forms of employment provision unless demand is met in other ways. This plan includes some

	residential allocations which include estimated housing numbers. If these allocations are to include the forms of employment provision required by this policy (with the exception of perhaps live/work units) they become mixed use allocations, with potential to reduce the capacity of such sites for housing. This needs to be considered further and factored into housing numbers. Additional allocations need to be proposed to make up for any loss in housing numbers.
EJ4: Access to jobs and skills	Noted.
EJ5: Provision of local services in employment areas	Noted.
EJ6: New transformational employment allocations	The proposed site allocations for employment uses do not reflect the level of demand nor shortage of supply noted in the Exeter Employment Study (2022) and Greater Exeter Economic Development Needs Assessment. The Employment Study states that demand is forecast for up to 83ha of employment land over the Plan period. These allocations fall significantly short of demand, proposing only 17ha and are proposed to serve transformational employment sectors only. The Plan is silent on the needs of other employment uses, particularly industrial uses which are likely to be displaced by the Council's house building strategy. This needs to be addressed.
HS1: The vitality of our high streets and centres	Noted.
STC1: Sustainable movement	The intention to redevelop existing employment sites to mixed use developments is unrealistic. While the intention may be to provide mixed use developments on these sites to accord with policy STC1 and other policies of the Plan, policy EJ2 facilitate the widespread redevelopment of existing employment sites. Without employment uses in

	walking distance, these developments may no longer be considered typically sustainable. Placing a blanket requirement on all major developments to include the provision of shared mobility, rather than 'suitable' developments (as required by the Outline Draft) may prevent developments from progressing when they are otherwise acceptable. In light of the housing and employment land shortage in Exeter, this is unnecessarily restrictive.
STC2: Active and sustainable travel in new developments	Noted.
STC3: Supporting active travel	Consideration needs to be given to the viability of developments where such contributions are required, particularly where they are required in the early phases of development.
STC4: Supporting public transport	Our client supports the provision and enhancement of sustainable modes of transport. Consideration needs to be given to the viability of developments where such contributions are required, particularly where they are required in the early phases of development.
STC5: Supporting new forms of car use	See response to policy ST1. Consideration needs to be given to the viability of developments where such contributions are required
STC6: Travel Plans	A blanket requirement for a Travel Plan for all major development in a City fails to take into account major development in wholly sustainable locations. A Travel Plan is a requirement of development which will generate significant amounts of traffic, as noted in the NPPF. It is unclear what ECC is trying to achieve by requesting a Travel Plan for all major developments irrespective of their location and credentials. A Travel Plan is

	required to resolve unacceptable impacts of a development, it should only be requested where a development will result in unacceptable impacts without Travel Plan being in place.
STC7: Safeguarding transport infrastructure	Noted.
STC8: Motorway service area	Noted.
STC5: Digital communications	Noted.
NE1: Landscape setting areas	Noted. However, greenfield sites will need to be identified within and adjacent to Exeter to supplement brownfield projects if the Plan is to be found sound. Sites within Landscape Setting Areas may represent a sustainable form of development where harm is localised, appropriately mitigated and where such developments are appropriately located, and this should be recognised within the Plan (as it has been in recent appeal decisions in these areas).
NE2: Valley Parks	These must be brought forward with stakeholder/landowner input for them to be deliverable.
NE3: Biodiversity	Noted. The requirement for 10% biodiversity net gain (alongside other contributions as set out in the Plan) has potential to render developments unviable particularly where they are vegetated (even in urban areas). There will need to be recognition within the plan that it might not be possible to provide all contributions/policy requirements listed in the Plan

	for reasons of viability. In these cases there will need to be a mechanism to establish the priorities for contributions, this must be addressed within the Plan.
NE4: Green infrastructure	Consideration needs to be given to the viability of developments as a result of these requirements and others in the plan. Clarification is required to explain what circumstance would necessitate contributions towards green infrastructure, sustainable transport, and gateway access points.
NE5: Green circle	Noted.
NE6: Urban greening factor	Noted. Consideration needs to be given to how this requirement will affect the density of development and as a result the housing numbers/employment achievable on each of the sites allocated by the Plan.
NE7: Urban tree canopy cover	Noted. Consideration needs to be given to how this requirement will affect the density of development and as a result the housing numbers/employment achievable on each of the sites allocated by the Plan.
HH1: Conserving and enhancing heritage assets	Noted and whilst supported, it must be recognised that Exeter is experiencing a significant shortage of both housing and employment land, such that it is important that this policy does not unnecessarily stifle development when impacts can be satisfactorily mitigated.
HH2: Heritage assets and climate change	Noted.
HH3: Conserving and enhancing Exeter City Walls	Noted.
C1: Protecting and enhancing cultural and tourism facilities	Noted.

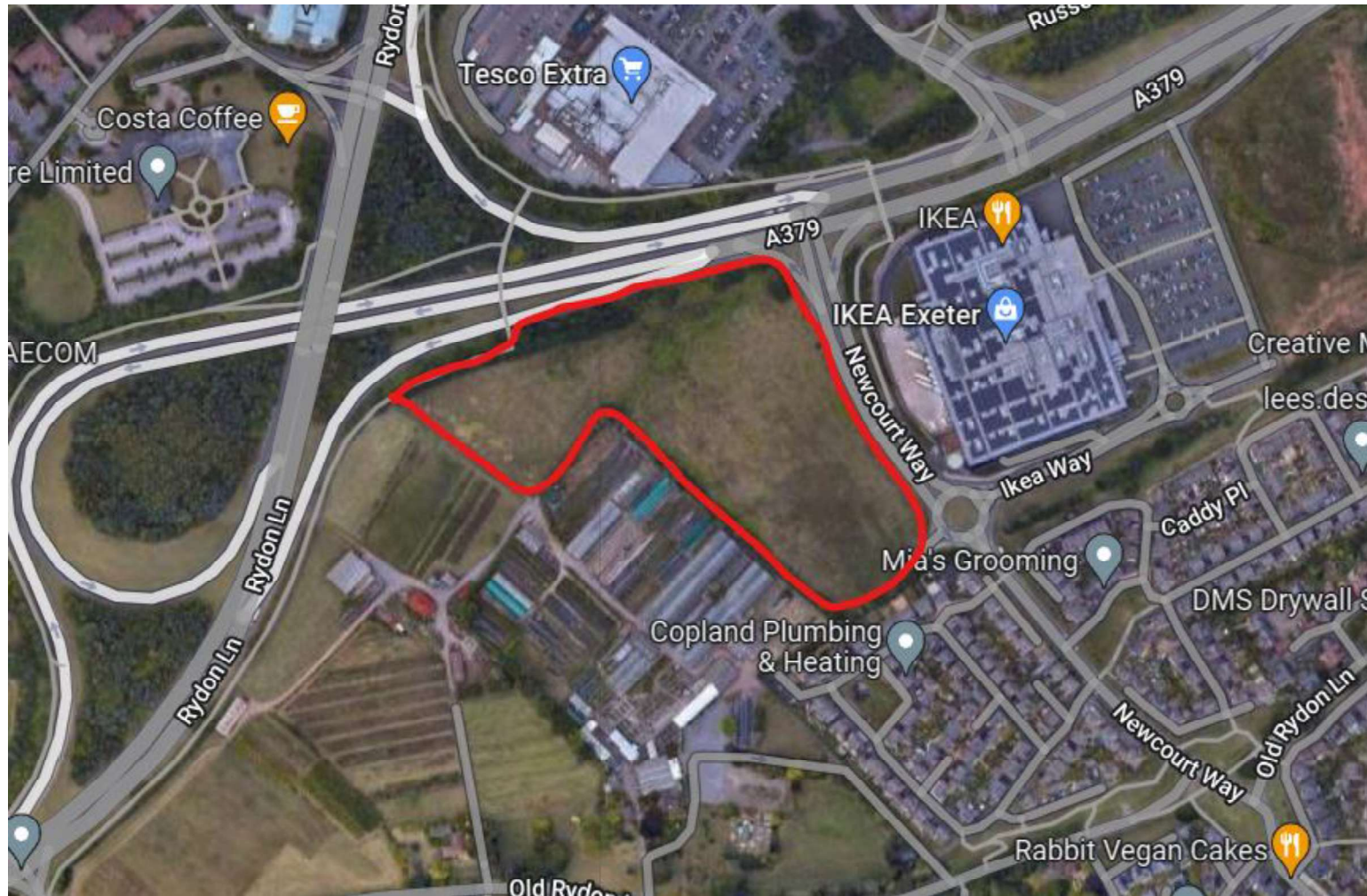
C2: Development and cultural provision	Noted. This policy refers to all large scale development proposals. Yet the supporting text at para. 11.15 suggests that cultural and tourism facilities should be provided as part of mixed use schemes. Clarification is required to confirm whether this is applicable to all large scale developments or just those mixed use schemes. If it is applicable to all large scale developments, particularly allocated residential developments, this will likely affect the capacity of the site to accommodate housing and this must be reflected in the Plan's housing allocation numbers. If this will result in a reduction in capacity, additional sites must be allocated.
D1: Design principles	This policy states that development proposals will be supported where they 'Contribute to the provision of a compatible mix of uses which work well together to create vital and viable places. This seems to be at odds with the proposed site allocations for the redevelopment of existing employment sites to include residential uses. Existing industrial uses (B2 and B8 uses) are unlikely to be compatible with residential uses yet a high proportion of the housing land supply relies on the redevelopment of existing employment sites. Further the policy states that development proposals will be supported where the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings.' However, paragraph 3.12 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area. The Plan doesn't demonstrate that these two aims/objectives are compatible.
D2: Advertisements	Noted.

HW1: Health and wellbeing	The policy states that ‘Developments will make financial payments towards improved health infrastructure commensurate with any additional demand placed on the existing provision.’ This requirement will need to meet the tests of planning obligations and requests well evidenced. Consideration needs to be given to the viability of developments because of these requirements and others in the plan. Large scale developments need to be defined within the Plan, with reference to policy and others within the Plan.
HW2 Pollution	Noted. Whilst policy HW2, which states that development proposals will only be permitted where they ‘will not place unreasonable restrictions on the future operation of existing businesses’, is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met.
IC1: Delivery of infrastructure	The policy states that developer contributions will be sought through the community infrastructure levy and section 106 to ensure that the necessary physical, social, economic, and green infrastructure is in place to deliver development. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC3: Viability	Noted.

APPENDIX 2. CLIENT'S LANDHOLDINGS (SITES 89 and 140)



APPENDIX 3. OUR CLIENT'S LANDHOLDINGS (SITE 136)



APPENDIX 4. PLANNING STATEMENT (SITE 140)