

REPORT TO STRATEGIC SCRUTINY COMMITTEE

Date of Meeting: 14 March 2024

Report of: Director of City Development and Housing

Title: Exeter Plan: Full Draft consultation: Initial reporting

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1. Between September 2023 and January 2024, the Council consulted on a Full Draft of the emerging Exeter Plan, the new Local Plan for the city. Since the consultation closed, the Local Plans Team has been undertaking initial evaluation of the consultation responses received. This report provides an initial summary of this work. A full consultation report will be presented to the Executive later this year.

2. Recommendation:

2.1 That the summary of the Full Draft Exeter Plan consultation, as included in this report, is noted and discussed.

3. Reasons for the recommendation:

3.1 To provide an opportunity to reflect on the engagement activities undertaken during the Full Draft Exeter Plan consultation and to give an early update on the consultation responses received.

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

4.1 There are no resource implications of the recommendations which are to note and discuss the contents of the report. This is because the consultation which is referred to has been completed within existing budgets.

5. What are the legal aspects?

5.1 The preparation of planning policy, usually through a Local Plan, is a legal requirement under section 19 of the Planning and Compulsory Purchase Act 2004. This report provides an update on the Full Draft Exeter Plan consultation. This consultation complied with the provisions of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires the Local Planning Authority to undertake an early statutory consultation process.

6. Report details:

Consultation activities

6.1 The Full Draft Exeter Plan document, and the accompanying proposals map, was available for public comment between 23 October 2023 and 15 January 2024. This twelve-week period was twice the statutory required minimum and twice the six weeks set out in the Council's Consultation Charter.

6.2 The consultation material included a Full Draft Exeter Plan document and the emerging evidence base. This evidence base has developed since the previous consultation and will continue to be added to as the plan progresses.

6.3 Approximately the first half of the consultation ran alongside parallel consultations on the Liveable Water Lane Supplementary Planning Document and the Householder's Guide: Design of extensions and alterations Supplementary Planning Document.

6.4 Responses to the consultation material were invited online through the Commonplace engagement platform with alternative options available to email or post responses back to the Council. The consultation was also signposted directly from the Council's website.

6.5 In addition to the significant digital presence, 15 public exhibitions were held across the city, running daytime into evening to promote access. The exhibitions were arranged to provide a geographic spread across the city whilst also to be located close to the main development sites proposed in the Draft Plan. A wider range of venue type was also chosen for the consultation this year with a greater number of cultural and community spaces used in order to widen the audience. Officers from the City Development team spoke to more than 500 people at these events.

6.6 To supplement the exhibitions, officers attended five established coffee mornings/events organised by the Exeter Community Builders to provide additional opportunities to engage with different groups in a less formal setting. Officers spoke to more than 100 people at these gatherings.

6.7 In total, 645 people attended the various events.

6.8 Great efforts were made to promote the consultation in a variety of ways including via:

- Providing copies of the Draft Plan consultation document in all of the city's libraries.
- Permanent displays at Exeter venues including St Sidwell's Point and Riverside Leisure Centres, RAMM, Exeter Tickets (Corn Exchange) and the Civic Centre.
- The Council's weekly e-newsletter (available through 'Stay Connected') which goes to over 4,000 people across the city.
- Email / post notification for all those included on the Council's planning policy database and any properties in the potential development sites.
- A series of press releases during the consultation.
- Extensive use of social media during the consultation.
- Digital advertising screens at locations throughout the city including prominent locations such as Central Station, the bus station and RAMM.
- Banners over Bridge Road and Topsham Road.

- Adverts on the Council's fleet of bin lorries providing repeat coverage for all households in Exeter.
- Posters: More than 200 posters were distributed across the city including to libraries, community centres, parks, car parks, shops and schools.
- Articles included in the September 2023 and December 2023 editions of the Exeter Citizen which goes to each address in Exeter.
- An article in Iscatape – Exeter's talking newspaper for visually impaired people.
- Promotion through Exeter Connect and associated networks.
- A community organisation workshop.
- Prominent advertising on the City Council's website homepage.

6.9 Significant efforts were also made to make the consultation material interesting and accessible in its presentation. The various features in the Commonplace engagement platform were used to present the content in more manageable sections, provide a series of quick questions, prepare a summary version of the plan policies in digestible format, present an interactive map and to show what development sites could look like in future. Paper copies of the plan were printed and a fully accessible digital version of the plan was made available. An audio version of the document was produced on CD and was available online, whilst other alternative formats were available on request.

6.10 Finally, the consultation questions were organised in a way to enable people to respond in a variety of ways. As already explained, questions were provided within an online survey, Word versions of the survey form were available and paper copies were provided at the various exhibitions. As per the previous Exeter Plan consultation, the consultation survey initially asked a simple 'initial feeling' question of how the respondent felt about the policy or site, with an open, follow-up question asking for more details and an explanation of views. No questions were mandatory to provide flexibility in how people answered. Lastly, as part of the online platform, four 'quick questions' were provided to enable people to provide input about four important Exeter Plan topics. The aim of these was to enable people to provide consultation input quickly to encourage responses from those who may not have time to go through the full survey.

The consultation in numbers

6.11 A summary of the responses received and some of the key patterns to these responses is provided in the next section of the report.

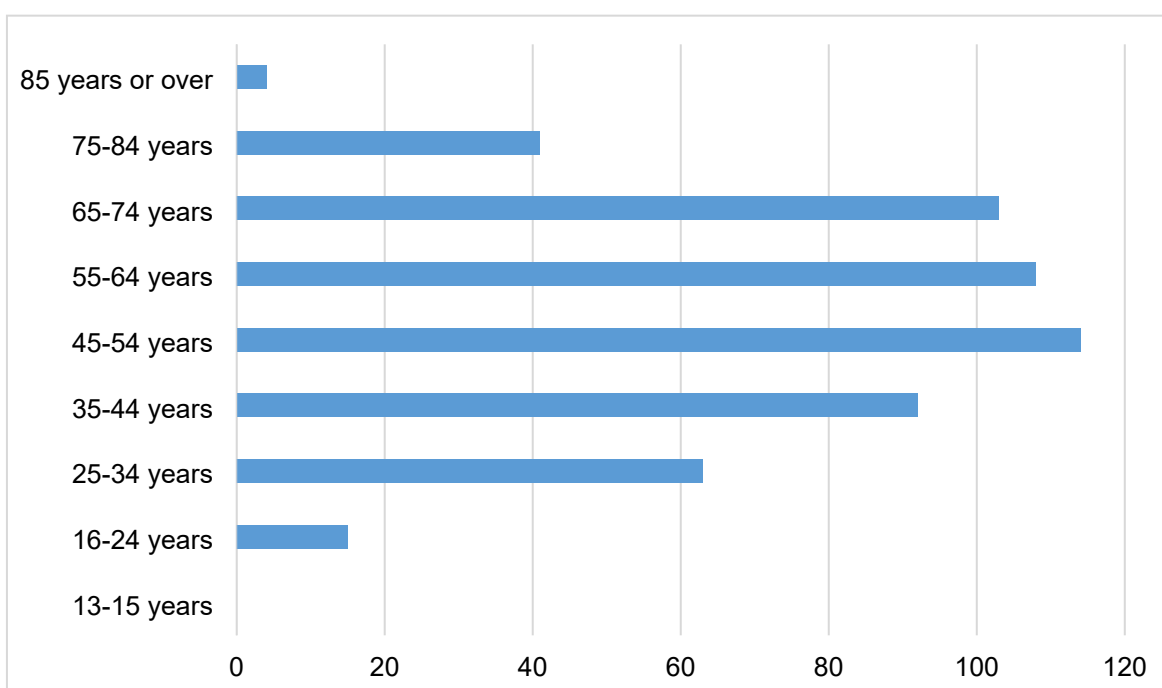
- Total number of respondents: 1118
- Total number of responses: 2856
- Total number of responses to the 'quick survey': 715
- Total number of people attending the exhibitions: 537
- Total number of people spoken to at coffee mornings: 108
- Total number of hits on the Commonplace consultation webpage: 11,248

6.12 The consultation survey included an option to identify whether the response was on behalf of an individual or an organisation. The vast majority of the 1118 respondents were individuals (1030) with 88 stating they were responding on behalf of an organisation. Table 1 outlines a breakdown of the respondent type, including type of organisation.

Respondent type	Number of respondents
Individuals	1030
Other organisations	42
Developers / agents / land promoters	28
Government agencies / public bodies	12
Councils	6
TOTAL	1,118

Table 1: Number of respondents by respondent type

6.13. The consultation survey included an option for the respondent to select their age range. Around half (578 respondents) chose to either leave this question blank or select 'prefer not to say' leaving 540 responses with an age range provided. The highest numbers of respondents were between the four age brackets covering 35-74 years, with 45-54 years being top with 114 respondents in the age category. The distribution of ages is presented in Graph 1.



Graph 1: Age range of respondents

Summary of responses received: Quick questions

6.14 During the consultation a series of four 'quick questions' were released at regular intervals. These were intended to provide people with a quick and easy way of demonstrating their interest in some of the key issues which the plan is addressing. The four quick questions were related to:

- Building heights and density.
- Climate change.
- High-tech business.
- The role of the city centre.

6.15 The four quick questions received a total of 715 responses. The question covering building heights received the largest number of responses at 259. This was closely followed by the question on the role of the city centre with 218 responses. More detail on the quick question responses is included in Table 2.

Topic	Total	Answering yes	Answering no
To provide the homes Exeter needs and still protect green spaces and our natural environment, we need to build closer to the city centre at higher densities, with some taller buildings where appropriate but more generous streets and public spaces. Do you agree with this idea?	259	149 (57.5%)	110 (42.5%)
Would you like to see more buildings with higher energy efficiency standards and more renewable energy generation?	133	125 (94%)	8 (6%)
To increase earnings and encourage people to stay and live in the city, Exeter City Council wants to encourage more high-tech and innovative businesses into the city and improve training opportunities. Is this a good idea?	105	91 (86.7%)	14 (13.3%)
The way we shop and the role of the city centre is changing. In future, it will be important to have a wider variety of uses, facilities, jobs and homes in the city centre. Is this a good idea?	218	179 (82.1%)	39 (17.9%)

Table 2: Numbers of responses to the consultation quick questions

6.16 The responses to these questions suggest broad support for important strands of the spatial strategy included in the Exeter Plan including:

- Protecting our natural environment.
- Developing at higher densities with some taller buildings where appropriate if this allows environmental protection.
- Efficient buildings and renewable energy generation.
- Encouraging innovative employment sectors.
- A wider mixture of uses in the city centre to maintain vitality.

Summary of responses received: Policies

6.17 The Full Draft Exeter Plan included 62 draft policies for comment covering a wide range of topics. Policy H2: Housing allocations listed all the potential development sites for the plan. This has not been included with the review of responses to other policies because the consultation asked questions on the sites separately. A review of the detailed policy comments is still ongoing and so a full discussion of the responses to all of the policies is not included here.

6.18 Table 3 sets out the five draft policies which received the largest number of responses, combining the responses outlining an overall view of the policy (an 'initial feeling response' demonstrated by a smiley face or a frown) and the number of more detailed text comments.

Policy	Number of 'initial feeling' responses	Number of comments	Total
S1: Spatial strategy	113	99	212
STC1: Sustainable movement	95	93	188
S2: Liveable Exeter delivery principles	84	81	165
H1: Housing requirement	82	83	165
CC1: Net Zero Exeter	81	80	161

Table 3: Draft policies receiving the largest number of responses

6.19 Table 4 sets out the five draft policies which received the smallest number of responses.

Policy	Number of 'initial feeling' responses	Number of comments	Total
C2: Development and cultural provision	14	16	30
EJ2: Retention of employment land	17	11	28
EJ3: New forms of employment provision	11	11	22
EJ5: Provision of local services in employment areas	11	11	22
EJ4: Access to jobs and skills	10	12	22

Table 4: Draft policies receiving the smallest number of responses

6.20 The responses to the question asking people about their 'initial feeling' about each of the policies show that the majority of policies (67% or 41 out of the 61 policies) were generally well received with 50% or more respondents selecting feeling 'satisfied' or 'happy' with the policy. The remaining 20 policies received less than 50% of people selecting feeling 'satisfied' or 'happy'.

6.21 The policies which were positively received by 50% or more of respondents are:

- S1: Spatial strategy
- S2: Liveable Exeter delivery principles
- CC1: Net zero Exeter
- CC2: Renewable and low carbon energy
- CC3: Local energy networks
- CC4: Ground-mounted photovoltaic arrays
- CC5: Future development standards
- CC6: Embodied carbon

- CC7: Solar-ready development
- CC8: Flood risk
- CC9: Water quantity and quality
- H7: Specialist accommodation
- H11: Loss of residential accommodation
- H12: Accessible homes
- H14: Residential amenity and healthy homes
- EJ1: Economic growth in the transformational sectors
- EJ2: Retention of employment land
- EJ3: New forms of employment provision
- EJ4: Access to jobs and skills
- EJ5: Provision of local services in employment areas
- EJ6: New transformational employment allocations
- STC3: Supporting active travel
- STC4: Supporting public transport
- STC6: Travel plans
- STC7: Safeguarding transport infrastructure
- STC9: Digital communications
- NE2: Valley Parks
- NE3: Biodiversity
- NE4: Green infrastructure
- NE5: Green circle
- NE6: Urban greening factor
- NE7: Urban tree canopy cover
- HH1: Conserving and enhancing heritage assets
- HH2: Heritage assets and climate change
- HH3: Conserving and enhancing Exeter City Walls
- D1: Design principles
- HW2: Pollution and contaminated land
- IC2: Viability
- IC3: Community facilities

- IC4: Sport, recreation and allotment space in new development
- IC5: Play areas in new development
- IC6: New cemetery provision

6.22 The policies which were positively received by less than 50% of respondents are:

- H1: Housing requirement
- H3: Affordable housing
- H4: Build to rent
- H5: Co-living housing
- H6: Custom and self-build housing
- H8: Purpose built student accommodation
- H9: Gypsy and traveller accommodation
- H10: Residential conversions and houses in multiple occupation
- H13: Housing density and size mix
- HS1: The vitality of our high streets and centres
- STC1: Sustainable movement
- STC2: Active and sustainable travel in new developments
- STC5: Supporting new forms of car-use
- STC8: Motorway service area
- NE1: Landscape setting areas
- C1: Protecting and enhancing cultural and tourism facilities
- C2: Development and cultural provision
- D2: Advertisements
- HW1: Health and wellbeing
- IC1: Delivery of infrastructure

6.23 Policy S1: Spatial strategy was reasonably well received, with 53% of respondents feeling happy or satisfied with the policy. This is important because it provides a summary of the key approach to be taken in relation to new development in Exeter from which much of the rest of the plan content flows. A number of the housing and transport policies were less well received. Further analysis will be required to understand this further.

Summary of responses received: Sites

6.24 The outline draft Exeter Plan proposed 6 strategic, mixed use brownfield sites, 18 residential-led sites and 4 employment site allocations. A full consultation analysis has

not been provided here because the assessment is still ongoing. However, some initial patterns are included here.

6.25 The six sites which received the largest number of responses are listed below.

- Exe Bridges Retail Park
- Marsh Barton
- Water Lane
- North Gate
- South Gate
- East Gate

6.26 In terms of the views of respondents, there were four sites (all brownfield) which received at least 50% positive responses, although the number of respondents is relatively low. The sites are listed in Table 5.

Site	% 'happy' or 'satisfied'	% 'unhappy' or 'dissatisfied'	Number of respondents
99 Howell Road	75	13	8
Chestnut Avenue	50	30	10
Former overflow car park, Tesco	50	40	10
88 Honiton Road	50	38	24

Table 5: The four sites with 50% or more positive responses

6.27 There were five sites to which over 70% of respondents provided negative responses. Four of these sites are greenfield, with the other at Exe Bridges in use as an edge of city centre retail park. The sites are listed in Table 6.

Site	% 'happy' or 'satisfied'	% 'unhappy' or 'dissatisfied'	Number of respondents
Land to the west of Newcourt Road, Topsham	0	82	17
Exe Bridges Retail Park	16	81	290
Land at Newcourt Road, Topsham	7	80	15
Land adjoining Silverlands	0	77	13
Land at Old Rydon Lane	14	76	21

Table 6: The five sites with 70% or more negative responses

Brief comparison between Outline Draft and Full Draft Consultations

6.28 The Full Draft Plan consultation reporting will compare in more detail the responses to both the 2023/24 Full Draft consultation and the 2022 Outline Draft consultation. However, a brief comparison and discussion is included here, with initial data included in Table 7.

Engagement measure	Outline draft plan	Full draft plan
Total number of respondents	1,489	1,118
Total number of responses	3,473	2,856

Table 7: A comparison between the level of engagement in the Outline Draft and Full Draft Plan consultations

6.29 Overall, the Full Draft Exeter Plan consultation received fewer responses than the Outline Draft. It is challenging to determine accurately the reasons for this. However, by considering some informal conversations with people at events, reviewing the comments received and by considering the context of what is happening in the city more widely, reasons for this could be:

- Time of year: The Full Draft Plan consultation was a month later in the year, running more deeply into the winter than the Outline Draft which may have impacted event attendance, particularly on the occasions when specific weather coincided with consultation events (e.g. Storm Ciaran took place on the same day as one of the exhibitions).
- Consultation fatigue: After previous rounds of Exeter Plan consultation, Devon County Council consultations and various significant planning applications, the appetite for engagement may have diminished.
- Similar consultation content: Although the plan had evolved significantly between the Outline and Full Drafts, to the wider public the overarching presentation, content and aims of the plan may have appeared similar.

6.30 As stated earlier in the report, significant efforts were made to engage with a wide variety of groups in a number of ways. Response monitoring also took place during the consultation period in order that efforts could be made to encourage further engagement as the consultation progressed. This resulted in additional activities being implemented and a significant increase in number of responses in the last two weeks of the consultation when compared with the Outline Draft. The additional activities included:

- Additional exhibitions in a wider variety of venues.
- Attendance at existing coffee mornings.
- Use of quick questions.
- More frequent press releases.
- More frequent social media activity and use of Instagram reels.

Next steps

6.31 The assessment of the consultation responses is currently ongoing. A more detailed consultation report will be presented to the Executive later in 2024. The responses will be used to inform the next stage of the plan-making process. A further consultation will be held in autumn 2024. There will be a further opportunity to discuss the next, and what is

anticipated to be final, draft of the Exeter Plan at the Strategic Scrutiny Committee meeting in September 2024.

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

7.1. The recommendation in the report is that the summary of the Full Draft Exeter Plan consultation, as included in this report, is noted and discussed. No formal decision is sought. However, the content of the emerging Exeter Plan will support all five of the Council's strategic priorities through the Exeter Vision 2040, the overarching spatial strategy for the city and a series of specific thematic policies:

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

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

8.1. The report is a summary of the Full Draft Exeter Plan consultation. The recommendation is to note and discuss the summary of the consultation which has already taken place and the responses which are analysed were provided by third parties. On this basis, there are no risks associated with the recommendation.

9. Equality Act 2010 (The Act)

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

10. Carbon Footprint (Environmental) Implications:

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

11. Are there any other options?

11.1 It is appropriate to note and discuss the responses to the Full Draft Exeter Plan consultation in order that they can be used to inform future stages of plan preparation. There are no other options.

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

Background papers used in compiling this report:

Exeter Plan: Full Draft plan

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