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03 February 2025

The University of Exeter (UoE) appreciates the opportunity to review and comment on the Publication Draft of the Exeter Plan (Regulation 19). The University values the opportunity to share ideas on the city's future growth patterns, potential development sites and strategic policies that will shape new initiatives.

The University has its own development plans for its landholdings within the city and seeks to ensure these are closely aligned with the Exeter Plan. This response outlines the University's views on the plan's content and level of constructive and ongoing engagement, while highlighting its specific interests, ongoing proposals, and emerging initiatives.

Significant investment continues to be made in the St Luke's and Streatham campuses and associated facilities. The University aims to extend the benefits of these investments across the city and local economy, encompassing areas such as community engagement and environmental sustainability.

Collaboration remains a key priority for the University in implementing the Exeter Plan. As a partner in Liveable Exeter and a member of the Liveable Exeter Place Board, the University supports its principles and welcomes its integration into the Exeter Vision 2040 and the Exeter Plan.

Through its commitments under the Exeter Civic University Agreement, the University of Exeter Strategy 2030, and its involvement in Exeter City Futures and the Exeter Development Fund, the University is committed to supporting the delivery of the local plan and its overarching vision.

Yours sincerely



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Comments on the Draft Publication Exeter Plan (Reg 19) (December 2024)

S1: Spatial strategy (Strategic policy)

Policy text:

The spatial strategy will deliver on the Exeter Vision 2040 and the city's ambitions for net zero, climate change adaptation and resilience, high quality development, health and wellbeing, the vitality of the city centre, the natural environment, heritage and cultural diversity. The City Council will work with partner authorities and other stakeholders to deliver these ambitions.

The spatial strategy for delivering development in Exeter has 15 elements:

- 1. Providing good quality homes of a variety of types in the city to meet Exeter's various needs;*
- 2. Working with neighbouring Councils to ensure that the employment needs of the wider functional economic area are met;*
- 3. Enabling traditional and new forms of employment provision in the city, developing the transformational sectors and supporting improvements to education and skills to ensure employment needs are met;*
- 4. Focusing the majority of development on strategic brownfield sites, particularly in locations close to the city centre to support its ongoing vitality and access to public transport hubs;*
- 5. Enabling the development of smaller brownfield sites as they become available;*
- 6. Considering modest greenfield development as a supplement to the overall focus on brownfield sites;*
- 7. Providing high quality, mixed use development at optimal densities appropriate to the characteristics, heritage and function of the local area to minimise the need to travel and maximise walking, cycling and public transport;*
- 8. Locating development near enough to key services and facilities to allow residents to meet most of their daily needs easily on foot or inclusive equivalent;*
- 9. Protecting the landscape value of the sensitive hills which provide the vital setting of the city;*
- 10. Protecting and enhancing biodiversity throughout the city and improving the ecological value of the River Exe, its estuary and wildlife networks;*
- 11. Conserving, enhancing and improving access to, and interpretation of, Exeter's outstanding historic environment;*
- 12. Steering development to avoid areas of higher flood risk where possible and managing residual flood risk as appropriate;*
- 13. Enabling development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement;*
- 14. Reflecting local identities, providing for diverse neighbourhoods and delivering high quality public realm and community spaces to grow the city's cultural offer and drive regeneration; and*
- 15. Delivering the range of infrastructure and services needed in a timely manner to support high quality development and our communities.*

UoE comments

The University maintains support for the spatial strategy policy S1. Specific comments are made below on some of the numbered points in the draft policy.

Policy Point 1 aims to ensure the provision of a sufficient supply of high-quality homes in a variety of types to meet the needs of the Exeter City Council area. The University supports this objective by continuing to provide student accommodation on its campuses and is committed to maintaining this contribution. Given the substantial student population in Exeter, student housing is a vital component of the city's overall housing supply.

As the University plans for growth through 2040, identifying and securing opportunities for additional purpose-built student accommodation (PBSA) in sustainable locations remains a priority. While the University acknowledges that the Exeter Plan generally supports these objectives through its redevelopment proposals, it believes that explicitly recognising the ongoing demand for PBSA within the plan would be beneficial.

Policy Point 2 focuses on facilitating new employment opportunities in the city and collaborating with neighbouring councils to meet the employment needs of the broader economic market area. In line with this goal, the proposed Innovation Hub at East Gate is a represents a strategic priority for the University.

Policy Point 3 prioritises development on large, strategic brownfield sites, particularly those near the city centre, while **Point 4** supports the use of smaller brownfield sites as they become available. The University aligns with this approach and endorses these principles.

Within this broader framework, the University is exploring the redevelopment of its St Luke's campus. The proposed redevelopment aims to establish a future health campus, consolidating health and well-being education and scaling up biomedical and clinical research. Additionally,

the University anticipates redeveloping the nearby Rowancroft and James Owen Court student accommodation to achieve a net increase in bedspaces within the 2040 plan period.

The University is progressing a new masterplan framework for the St Luke's campus redevelopment and has worked in partnership with the City Council's planning team to realise the site's future potential.

S2: Liveable Exeter principles (Strategic policy)

Policy text:

The delivery of strategic, brownfield developments will be supported.

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

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

Principle 1: Memorable places. Development will:

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

Principle 2: Outstanding quality. Development will:

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

Principle 3: Welcoming neighbourhoods. Development will:

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

Principle 4: Liveable buildings. Development will:

- *Be adaptable and resilient to the effects of climate change;*
- *Respond flexibly to changing demands and lifestyles;*
- *Include beautiful buildings which complement local character using high quality designs and materials;*

- *Ensure buildings are energy efficient, adopt a fabric-first approach and apply high performance standards such as Passivhaus and whole-life carbon assessment;*
- *Provide homes that are predominantly dual aspect ensuring high levels of natural daylight and ventilation; and*
- *Be arranged and designed to maximise internal air quality.*

Principle 5: Active streets. Development will:

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

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

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

Principle 7: Connected Culture. Development will:

- *Use culture to improve development quality to drive investment for strategic growth and sustainability in Exeter.*
- *Support local economic growth by providing flexible space for creative industries.*
- *Create resilient, adaptable, networked communities and successful centres that support civic pride and express local identity.*
- *Support high quality cultural place-making projects in the public realm and community facilities to achieve exemplary social value and environmental quality.*
- *Safeguard, promote access to, and reflect, cultural heritage in local place-making.*
- *Harness Exeter's rich heritage, local identities and creative talent through civic participation in culture and by supporting 'mean-while uses' whilst sites are being developed.*

UoE comments

The University maintains its support of the Liveable Exeter delivery principles set out in the policy and note that much of the rest of the plan policies provide further policy guidance on how these will be achieved.

CC1: Net zero Exeter (Strategic policy)

Policy text:

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

*Development proposals will be required to demonstrate how they will support the achievement of net zero through each of the following:
Considering location, urban form, density and place-specific solutions;*

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

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

UoE comments

The University acknowledges and appreciates the reference in paragraph 5.4 of the City Council's collaboration with the University, particularly the establishment of the flagship Innovation Hub within the proposed City Point development at East Gate. This Innovation Hub is a strategic priority for the University, reflecting its commitment to supporting regional businesses and organisations in advancing their climate and environmental goals to achieve net zero carbon emissions and beyond.

The University fully supports policy CC1 and its objectives. It has set its own ambitious target of achieving net zero carbon emissions across its estate and has already implemented several initiatives to progress toward this goal. These include the recent installation solar photovoltaic panels at Car Park B on the Streatham campus and the adoption of Passivhaus/Net Zero standards for future developments as outlined in its latest sustainable design guide. The University remains committed to maintaining high standards of energy efficiency across its buildings and will actively explore additional opportunities for renewable energy generation across its estate.

In addition, the University is dedicated to enhancing green infrastructure and achieving biodiversity net gains on its estate. This includes plans to improve the biodiversity of the Lower Hooper Valley and explore other potential enhancements for ecological benefit.

CC2: Renewable and low carbon energy

Policy text:

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

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

UoE comments

The University welcomes policy CC2 and its support for new renewable and low carbon energy-generating development and associated infrastructure.

CC3: Local energy networks (Strategic policy)

Policy text:

Local energy networks are proposed in the following locations:

- a. *Monkerton and Hill Barton;*
- b. *The city centre, South Gate, Heavitree Road and Wonford;*
- c. *Matford, Marsh Barton, Water Lane and Exe Bridges Retail Park;*
- d. *Red Cow, New North Road and the University; and*
- e. *In other locations across the city where it is shown that it is feasible and viable to bring forward a local energy network.*

Within these areas, and throughout the city within 500 metres of any local energy network subject to a contractual commitment, all new development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more homes, must be constructed to have heating (water and space) systems compatible with the proposed or existing local energy network and include provision for the necessary pipework connection from those in-building systems up to the appropriate site boundary to allow for future connection to the network when available, unless it can be demonstrated by the applicant at the detailed design stage, having regard to the type of development involved and its design, that this is not feasible or viable.

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

UoE comments

The University notes the reference to a proposed local heat network covering St David's, Red Cow Village, New North Road and the University and confirms that potential for connection to heat networks (when available) is being considered by the University.

Policy H10: Purpose built student accommodation.

Policy text:

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

- a. Are located on the University of Exeter's campuses, in the city centre or on sites that are within controlled parking zones and well connected to the campuses, local services and facilities by walking, cycling and public transport;*
- b. Provide residents with high quality housing comprising a private bedroom in a cluster flat or studio that affords adequate functional living space and layout, within a wider development that includes sufficient communal facilities, services and external amenity space to meet student needs;*
- c. Are accompanied by a Transport Statement/Transport Assessment and Travel Plan and include no private car parking other than for blue badge holders;*
- d. Incorporate appropriate facilities for bike storage, vehicle drop – off and pickup and service vehicles;*
- e. Are in single ownership and control and professionally managed in accordance with a Management Plan; and*
- f. Are future-proofed in terms of design to support potential alternative uses as appropriate.*

UoE comments

The University welcomes the addition of a specific policy relating to proposals for purpose-built student accommodation (PBSA) within the city and the amendments made to policy and supporting text, namely:

- a. Deleting criterion that sought to regulate the location of PBSA throughout the city (i.e. excessive concentration)*
- b. Removing reference that all PBSA units should contain private en-suite bathrooms in all cases*

The University is strongly supportive of the addition of paragraph 6.64 stating that the 2007 University Supplementary Planning Guidance and the 2010 University of Exeter Streatham Campus Masterplan Framework Supplementary Planning Document align with the Exeter Plan and remain as material planning considerations.

The University values these SPDs and continues to use its guiding principles and to implement remaining development and redevelopment opportunities that are identified within it, as time and resources allow. It therefore welcomes that reference to the Masterplan SPD is also made in the supporting text of draft policy H10, until superseded by an updated version of the document in due course.

Policy EJ1: Economic growth (Strategic policy)

Policy text:

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

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

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

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

UoE Comments

The University fully supports policy EJ1 and its emphasis on fostering the city as a leading knowledge economy. It also appreciates the acknowledgment in the supporting text of the significant economic benefits the University contributes.

The identified transformational sectors align closely with the University's strengths in research, innovation, and teaching. The University looks forward to collaborating closely with the City Council on the implementation of this policy. This includes key projects such as the future health campus at St Luke's, the creation of the Innovation Hub at City Point, and other initiatives where the University is taking a leading role or providing advisory and supporting contributions.

Policy EJ3: New forms of employment provision (Strategic policy)

Policy text:

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

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

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

UoE comment

The University welcomes policy EJ3 and its emphasis on supporting innovative forms of employment provision. The planned Innovation Hub at City Point illustrates this approach, offering a collaborative environment and serving as a focal point for innovation. The University is keen to explore additional initiatives of this nature, adaptable to various scales and contexts.

Policy EJ6: New transformational employment allocations (Strategic policy)

Policy text:

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

Site	Size of site
<i>Land adjacent to Sandy Park, Newcourt</i>	<i>7 hectares</i>
<i>Land adjacent Ikea, Newcourt</i>	<i>4 hectares</i>
<i>St Luke's Health Campus, Heavitree Road</i>	<i>4.5 hectares</i>

UoE comment

The University welcomes policy EJ6 and the identification of St Luke's Health Campus. The Council will be aware that the University is currently working on a new masterplan for St Luke's Campus. Much work has been undertaken by the University, their advisors and officers of ECC to date in producing a collaborative document to guide new development across the campus in the future.

The University is therefore disappointed to note at supporting paragraph 7.31, that development proposals at St Luke's Campus will need to be informed by the *Exeter Views, Density and height Study* (December 2024), prepared on behalf of the council by Allies Morrison. This Study forms part of the evidence base underpinning the emerging Exeter Plan however was produced without requesting any prior engagement from the University's St Luke's Masterplan team working with ECC's officers for the past 18 months. Having received the Study as part of the Publication Draft Local Plan in December 2024, this Representations Letter is our first opportunity to offer feedback.

It is considered that the analysis and conclusions of the *Exeter Views, Density and height Study* has serious shortcomings, undermines much of the work undertaken on the Masterplan to date, failing to take account of the findings of several Design Boards consulted as part of this process. It is the intention of the University to submit comments on the *Exeter Views, Density and height Study* separately and fully justify its position.

It is therefore strongly requested that all references to the *Exeter Views, Density and height Study* are deleted in full.

Policy RFC1: The future of our centres (Strategic policy)

Policy text:

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

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

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

UoE comment

The University welcomes policy RFC1 and its support for a mix of uses that enhance the vitality, viability and resilience of the city centre, district centres and local centres. The University supports Purpose Built Student Accommodation as an important contribution for delivery of this policy and requests that reference is made to this in the supporting text.

Policy STC1: Sustainable movement (Strategic policy)

Policy text:

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

- a. Delivering on the spatial strategy by supporting development in locations which minimise the need to travel;*
- b. Supporting the transport hierarchy by maximising walking, cycling, wheeling and public transport for the majority of everyday journeys and enabling low-car development where appropriate;*
- c. Providing for mixed use development which enables communities to access most of their daily needs on foot, or alternative inclusive mode, from their home;*
- d. Supporting a healthy, active city through the transport hierarchy by delivering a prioritised and integrated network of active, inclusive travel links to provide coherent, direct, safe, comfortable and attractive routes for walking, cycling, wheeling and emerging modes;*

- e. *Achieving a reliable, low carbon, frequent and attractive standard of public transport within the city and to key destinations elsewhere throughout the day;*
- f. *Enhancing choices for all through new forms of car use by expanding shared mobility and requiring its provision in, or contributions from, all major developments, supporting innovations in subscription travel services, significantly increasing provision for electric vehicles and enabling the provision of mobility hubs;*
- g. *Supporting opportunities for sustainable waterborne transport and protecting the function of embarkation points to waterways;*
- h. *Protecting and enhancing the function of Exeter as a strategic rail, bus/coach, road and air hub through investments in critical infrastructure and improvements to sustainable connections to these hubs;*
- i. *Maintaining the transport function of the Exeter Ship Canal; and*
- j. *Ensuring safe travel.*

UoE comment

The University supports policy STC1 and the sustainable outcomes it seeks in relevant planning decisions. The range of outcomes align with the University's own sustainable travel strategies in supporting and providing for active travel and public transport and reducing private car use.

Policy STC2: The transport hierarchy (Strategic policy)

Policy text:

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

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

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

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

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

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

UoE comment

The University supports policy STC2 and the approach it advocates. This aligns with the University's own sustainable travel strategies in supporting and providing for active travel, public transport, electric vehicles, and car free development (where appropriate).

Policy STC3: Supporting active travel (Strategic policy)

Policy text:

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

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

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

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

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

Major development proposals must:

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

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

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

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

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

UoE comment

The University supports partnership working to prioritise and improve the existing active travel network in the city. The University will be interested to work with the City Council should specific improvements be sought within or in the vicinity of its landholdings, where the University may have a potential role in delivery or might provide advice about proposals.

Policy STC4: Supporting public transport (Strategic policy)

Policy text:

The City Council will work with other Authorities and stakeholders to support inclusive, direct, frequent and reliable public transport.

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

- a. On the Exeter Central corridor between Heavitree and the city centre;
- b. On the Exeter Northern corridor between New North Road and the city centre;
- c. On the Exeter Eastern corridor between Pinhoe Road and the city centre;
- d. On the Exeter western corridor between Cowick Street and the city centre;
- e. On Topsham Road, Alphington Road and Cowley Bridge Road;
- f. On the local and national coach network; and
- g. Serving Exeter Airport.

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

- a. By safeguarding land for a railway station and associated enabling track and signalling infrastructure at Monkerton/Hill Barton;

- b. *By supporting continued delivery of the Devon Metro programme including at least half hourly frequencies on rail lines into Exeter;*
- c. *By providing improved interchange facilities at St David's Station; and*
- d. *By improving accessibility and level access at all stations.*

The City Council will support multi-modal travel:

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

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

Major development must:

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

Development proposals of 100 homes or more and major commercial development must:

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

Contributions will be sought towards new or improved public transport services and/or infrastructure in the city, appropriately phased to most efficiently support the long-term future of the service.

UoE comment

The University supports partnership working to improve the public transport network in the city. It is noted that some of the identified provision connects to, passes through or skirts past the University's campuses and landholdings in the city. The University will be interested to work with the City Council should specific improvements be sought where the University may have a potential role in delivery or advice about proposals.

Policy STC9: Digital communications (Strategic policy)

Policy text:

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

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

All new residential, employment and commercial development will:

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

All large scale residential, employment and commercial development will:

- a. *Incorporate digital infrastructure as one of the essential utilities, with routing and phasing planned comprehensively alongside the other utilities and identified within a utility connection plan;*

- b. Where an appropriate organisation for its management is in place, provide a network of open access ducting (open to all fibre providers) suitable for, and including, full-fibre connections to each building on first occupation. Ducting must have capacity to accommodate multi-operator fibre connections to the premises to encourage competition and choice for consumers; and*
- c. Where appropriate management structures are in place, provide digital infrastructure ducting through a 'dig once' approach.*

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

UoE comment

The University supports policy STC9 and the commitment to enabling a step-change in digital communications. The University agrees that digital infrastructure is one of the essential utilities for inclusion in all major new development and already ensures that this is addressed in its own development.

Policy NE1: Landscape setting areas (Strategic policy)

Policy text:

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

- a. There is no harm to the undeveloped character, natural beauty or quality of views enjoyed by people within the city; and*
- b. There is no harm to the distinctive characteristics, special features and qualities that make this valued landscape sensitive to development, as identified in the Exeter Landscape Sensitivity Assessment; or*
- c. It minimises harm to the Landscape Setting Area and is reasonably necessary for the purposes of:*
 - Agriculture*
 - Forestry;*
 - The rural economy;*
 - Outdoor recreation;*
 - Providing green infrastructure;*
 - Landscape, education or biodiversity enhancement;*
 - Managing flood risk and delivering other forms of climate resilience; or*
 - Achieving net zero.*
- d. It delivers strategically important infrastructure and it can be demonstrated that there is no suitable alternative site with less harmful impacts and it minimises harm to the Landscape Setting Area.*

UoE comment

The University supports the protection of landscape setting areas and the proposed approach to assessing development proposals within these. It is an important balance that these areas are protected whilst recognising that in some circumstances some forms of development may be needed and can be allowed to occur, subject to appropriate criteria being met.

Policy NE2: Valley Parks (Strategic policy)

Policy text:

Within the Valley Parks only appropriate development which provides for the following functions will be supported:

- a. Informal outdoor recreation*
- b. Suitable Alternative Natural Greenspace;*
- c. Nature conservation and ecological enhancement;*
- d. Enhancement to active travel;*
- e. Environmental education;*

- f. *Managing flood risk and other forms of climate resilience; or*
- g. *Achieving net zero*

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

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

UoE comment:

The University supports policy NE2 and appropriate development that provides for the listed functions. With regard to the Hoopern Valley, which potentially fulfils all seven of the listed functions, the University has taken steps to further nature conservation value and improve public access. It is important that this balance continues to be properly addressed so that nature conservation goals and public access do not conflict.

Policy NE3: Biodiversity (Strategic policy)

Policy text:

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

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

Where development is likely to have either a direct or indirect adverse effect on a Site of Special Scientific Interest (SSSI) or on Irreplaceable Habitats (such as Ancient Woodland or Veteran Trees) it will not be permitted unless the benefits of the development clearly outweigh both the impacts on the features of the site and any broader impacts on the national network of sites.

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

- a. *The need for, and benefits of, the development is sufficient to outweigh biodiversity and/or geological conservation considerations;*
- b. *It can be demonstrated that there is no suitable alternative site with less harmful impacts; and*
- c. *Damaging impacts are avoided or minimised and appropriate mitigation and compensatory measures are implemented.*

All development proposals will be required to:

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

UoE comment

The University supports policy NE3 and the protection, enhancement and restoration of biodiversity. This is an integral part of the University's own strategies.

Policy NE4: Green infrastructure (Strategic policy)

Policy text:

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

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

UoE comment

The University supports policy NE4 and the protection and enhancement of existing green infrastructure and the delivery of new green infrastructure.

Policy D1: Design principles (Strategic policy)

Policy text:

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

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

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

UoE comment:

The University supports policy D1 and the list of design factors it sets out. The Council will be aware that the University is working on a new masterplan for St Lukes Campus. Once drafted, it is requested that it will be adopted by the Council as a Supplementary Planning Document (SPD)

Policy HH1: Conserving and enhancing heritage assets

Policy text:

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

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

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

Development proposals that result in harm to the significance of a non-designated heritage asset will only be permitted where it is demonstrated that this is justified by the public benefits of the proposals in the context of the significance of the heritage asset and its settings and the scale of any harm.

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

UoE comment

The University supports the aims of policy HH1 in principle. The Council will be aware the University owns heritage assets that are on national and local lists and is committed to their useful future where practicable. The University registers its concerns with parts of the evidence base referenced in the supporting text that underpins the policy, specifically the Heritage Impact Assessment (para 11.2) and the *Exeter Views, Density and height Study* (para 11.3).

The Council will be aware that the University is currently working on a new masterplan for St Luke's Campus. Much work has been undertaken by the University, their advisors and officers of ECC to date in producing a collaborative document to guide new development across the campus in the future. This Heritage Impact Assessment (para 11.2) and the *Exeter Views, Density and height Study* (para 11.3) forms part of the evidence base underpinning the emerging Exeter Plan however was produced without requesting any prior engagement from the University's St Luke's Masterplan team working with ECC's officers for the past 18 months. Having received these two documents as part of the Publication Draft Local Plan in December 2024, this Representations Letter is our first opportunity to offer feedback.

It is considered that the analysis and conclusions of these documents have serious shortcomings and undermine much of the work undertaken on the Masterplan to date. The University is considering the submission of comments in respect of these documents to ensure that they align with the work already undertaken.

It is therefore strongly requested that references to the Heritage Impact Assessment and the *Exeter Views, Density and height Study* in the supporting text are deleted until a consensus is reached with the University on the scope and findings of these documents.

Policy HW1: Health and wellbeing (Strategic policy)

Policy text:

Development proposals should maximise opportunities for achieving positive mental and physical health outcomes. All large scale residential development proposals should be accompanied by a Health Impact Assessment demonstrating how the proposal will:

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

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

Contributions towards improved GP provision will be sought where necessary.

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

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

UoE comments:

The University supports policy HW1 and the proposal for Health Impact Assessment to support major applications. Whilst not directly related to the policy, the University wishes to highlight that the proposed redevelopment of the St Luke's campus as a future health campus will include scaling up of biomedical and clinical research and health related partnerships. This will be complementary to the aim of the policy to achieve positive mental and physical health outcomes.

Policy IF1: Delivery of infrastructure (Strategic policy)

Policy text:

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

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

UoE comments:

The University supports policy IF1 that seeks to secure the delivery of infrastructure to support new development.

Policy IF3: Community facilities (Strategic policy)

Policy text:

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

- a. They are no longer fit for purpose; or*
- b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or*
- c. They are surplus to requirements; or*
- d. There are alternative, appropriate facilities in the area to meet community needs; and*
- e. Sufficient alternative or improved provision will be made in a suitable location to serve the local community, which clearly outweighs the loss.*

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

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

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

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

UoE comments:

The University supports policy IF3 as presently drafted.

Strategic mixed use brownfield allocation: SBA1 – Water Lane (Strategic Policy)

Policy text:

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

The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs Assessment and built to optimal densities in accordance with Policy H15, which meets a wide range of housing needs including:
 - i. Affordable housing in accordance with Policies H4, H5 and H6 as relevant;*
 - ii. Serviced plots for custom and self-build homes in accordance with Policy H7;*
 - iii. Accessible homes in accordance with Policy H14; and*
 - iv. A seventy unit extra care housing scheme.**
- B A mix of new forms of employment provision to meet the needs of the transformational sectors, including work hubs, collaborative workspace and live-work schemes, together with maritime sectors.*
- C A locally accessible neighbourhood centre including:
 - i. Public realm that includes a community green space and provides space for community and cultural activities;*
 - ii. A community building with hall, meeting rooms and flexible space for uses including potential library provision, youth, children's and adult's services, other community uses and cultural activities;*
 - iii. A new surgery providing GP, pharmacy and other community healthcare or contributions to GP provision;*
 - iv. Retail or commercial units with active ground floors accommodating local shops and services;*
 - v. A work hub;*
 - vi. A primary mobility hub; and*
 - vii. A two form entry primary school including early years and communal space for a family hub and contributions to secondary and special educational needs provision.**
- D Protection and enhancement of existing community and sports facilities in accordance with Policies IF3 and IF4, including the creation of Clapperbrook Hub at Bromham's Farm, provision of additional space for water related activities and safeguarding of the infrastructure needed to support strategic water related uses.*
- E Transport infrastructure to deliver a low-car development:
 - i. A layout that accords with active design principles, with Water Lane providing an active travel spine connecting Haven Banks with the neighbourhood centre and Marsh Barton Station, improved active travel routes along the Canal frontage, a new neighbourhood street connecting Water Lane and the neighbourhood centre with the Canal, the transformation of Haven Road to an active travel priority street and frequent, active green streets and lanes running towards the River Exe;*
 - ii. A layout that allows for access by emergency service and delivery vehicles and the provision of a bus service through the site, including a safeguarded bus route between Gabriel's Wharf and Marsh Barton Train Station;*
 - iii. A layout and design that takes account of the need of people with disabilities;*
 - iv. Mobility hubs to provide for active travel, shared mobility, public transport, electric vehicle charging and deliveries;*
 - v. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;*
 - vi. Delivery of, or contributions to, a new active travel crossing of the Canal that ensures its continued navigation function;*
 - vii. Provision of infrastructure for and contributions to public transport;*
 - viii. The provision of improved active travel and public transport access at Tan Lane under the Great Western main line towards Marsh Barton;*
 - ix. Electric vehicle charging points throughout the site; and**

- x. *An indicative average ratio of 1:5 car parking spaces to homes, with additional spaces provided for blue badge holders, servicing and car clubs in predominantly car free areas and a site wide strategy that allows for levels of car parking to reduce below the average over time.*

F. Enhancement of the natural environment and green infrastructure:

- i. *Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;*
- ii. *A mix of open space provision including for sport and recreation;*
- iii. *High quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park;*
- iv. *Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and*
- v. *Biodiversity enhancements and mitigation of impacts on priority habitats, including open mosaic habitats.*

G An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.

H Appropriate measures to respond to, and ensure the continued operation of, the gas and electricity infrastructure network across the site.

I Appropriate flood risk mitigation:

- i. *A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources;*
- ii. *Sustainable Urban Drainage to mitigate against flood risk; and*
- iii. *Delivery of, or contributions to, an emergency access and egress route.*

J. Conservation and enhancement of the historic environment:

- i. *A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation;*
- ii. *A built form that enhances the character and appearance of the Riverside Conservation Area and protects the settings of all Listed Buildings including the Cathedral, Quay House, Customs House, Wharfinger's House and the attached Warehouse (grade I) and Colleton Crescent, Colleton Villa, the Harbourmaster's Office, Fish Market and the Warehouse Vaults (grade II*); and*
- iii. *Enhancement of the Canal, with key buildings, materials and industrial structures including the Gas Works Former Manager's House retained and reused creatively to support a distinct character rooted in the area's history.*

K Measures to support the continued operation of existing waste operations close to the site.

L Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed used.

UoE comments:

The University recognises that Water Lane represents a key strategic brownfield redevelopment opportunity for the city and is supportive of policy that supports the delivery of a new sustainable neighbourhood.

The University is supportive of policy that prioritises the delivery of a new energy centre and related infrastructure for the benefit of the University, other organisations and institutions within the city. Aligned to this, the University has also registered its support for ECC's *Liveable Water Lane SPD*.

Officers will be aware that the University are in discussions with 1Energy regarding the provision of a new energy centre in this location as part of its plans to develop a city-wide heating network.

Strategic mixed use brownfield allocation: SBA2 – East Gate (Strategic Policy)

Policy text:

A site of 6.1 hectares at East Gate is identified for a mixed use development delivering approximately 609 homes, employment, education/training space and an impressive and memorable city centre gateway. The development must support the achievement of net zero

and accord with the Liveable Exeter Principles to deliver a compact and well connected neighbourhood, incorporating the highest standards of design.

The following will be required:

- A. A housing mix informed by the most up to date Exeter Local Housing Needs Assessment and built to optimal densities in accordance with Policy H15, which meets a wide range of housing needs including:
 - i. Affordable homes in accordance with Policies H4, H5 or H6 as relevant;*
 - ii. Serviced plots for custom and self-build homes in accordance with Policy H7; and*
 - iii. Accessible homes in accordance with Policy H14.**
- B A mix of employment provision including office space, work hubs, collaborative workspace and live-work schemes.*
- C Social, community and cultural infrastructure including:
 - i. Public realm that provides space for community and cultural activities;*
 - ii. Retail or commercial units;*
 - iii. Potential space for education/training provision/an innovation hub;*
 - iv. Contributions to early years, primary, secondary and special educational needs provision; and*
 - v. Contributions to GP provision.**
- D Transport infrastructure to deliver a low-car development:
 - i. A layout in accordance with active design principles comprising a dense network of active travel routes which link to the existing routes in the area including via improved crossings of Western Way, Paris Street, Heavitree Road and Cheeke Street;*
 - ii. A layout and design that takes account of the needs of people with disabilities;*
 - iii. A mobility hub to provide for public transport, active travel and shared mobility;*
 - iv. Contributions to off-site active travel routes including priority schemes in the Exeter Local Cycling And Walking Infrastructure Plan;*
 - v. Provision of infrastructure for, and contributions to, public transport;*
 - vi. Electric vehicle charging points throughout the site; and*
 - vii. Access arrangements for service and emergency vehicles.**
- E Enhancement of the natural environment and green infrastructure:
 - i. Green infrastructure provision in accordance with the Green Infrastructure Strategy including contributions to off-site provision;*
 - ii. Mitigation contributions to ensure no adverse effect on the European Sites, in accordance with requirements set out in the South East Devon Joint Habitat Mitigation Strategy; and*
 - iii. Biodiversity enhancements.**
- F An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks.*
- G Appropriate flood risk mitigation:
 - i. A layout and design informed by a detailed flood risk assessment which addresses flood risk from all sources; and*
 - ii. Sustainable Urban Drainage to mitigate against flood risk.**
- H Conservation and enhancement of the historic environment:*
- I A layout and built form informed by the Exeter Views, Density and Heights Study and archaeological and heritage assessment, evaluation and mitigation; and A built form that enhances the character and appearance of the Southernhay and The Friars and the Lower Summerlands Conservation Areas and protects the settings of all Listed Buildings including the Cathedral (grade I), Sidwell Street Methodist Church and 13-15 Dix's Field (grade II*) and those along Heavitree Road, others at Dix's Field and Southernhay Congregational Church (grade II). Investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed use.*

UoE comments:

The University supports the allocation of this site for mixed use development including 609 new homes and supports the redevelopment of all parts of the East Gate allocation for the mixed uses proposed. In particular, the University welcomes the inclusion of proposals for the Innovation Hub in this area. The Innovation Hub is a strategic priority for the University and is an integral part of the University's commitment to supporting regional businesses and organisations with their climate and environmental action plans towards achieving net zero carbon and beyond. The University looks forward to working with the City Council and other partners towards the success of this project.

Strategic mixed use brownfield allocation: SBA3 – Red Cow (Strategic Policy)

Policy text:

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

The following will be required:

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

- i. A layout informed by a detailed flood risk assessment which addresses flood risk from all sources, including the Taddiforde Brook;*
- ii. Sustainable Urban Drainage to mitigate against flood risk; and*
- iii. Delivery of, or contributions to, an emergency access and egress route.*

H. Conservation and enhancement of the historic environment:

- i. A layout informed by archaeological and heritage assessment, evaluation and mitigation; and*
- ii. A built form that enhances the character and appearance of St David's Conservation Area and retains sight lines of locally listed St David's station.*

UoE comments:

The University supports the allocation of this site for mixed use development including 442 new homes.

The site already includes some student accommodation owned by the University. In considering development/redevelopment proposals in the area, it would be suitable to include an element of additional purpose-built student accommodation in accordance with its sustainable location close to the Streatham campus. The agreed University SPG (2007) identifies the St David's area as a suitable location for this use.

Student accommodation should therefore be specifically mentioned in the reference to the housing mix in the description of what the site might be like in the future.