

Appendix 25:



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30th November 2022

By Email Only

Dear Sir/ Madam

MLPD 17001 On Behalf of The Pratt Group The Exeter Plan Draft Consultation Response

Introduction

On behalf of our client, The Pratt Group (TPG), we submit representations to the Outline Draft “Exeter Plan” (“plan,” “Local Plan”). All of the TPG land referred to herein is allocated for residential led development in the Core Strategy; there is a resolution to grant planning permission for 392 houses on a tranche of it. It is all greenfield land. (Please see Appendix 2).

Whilst there are many elements of the plan that our client fully supports, in this response we raise key themes that require attention by Exeter City Council (ECC) as part of the due process regarding appropriate consultation of the plan, its policies, and proposed allocations.

We go on to provide largely supportive specific responses to the plan questions in Appendix 1.

It is clearly in the interests of everyone that the city produces a “sound” “Exeter Plan” as soon as possible and our client will support the Council in this aim.

The Duty to Cooperate

The Duty to Cooperate places a legal duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The National Planning Policy Framework (NPPF) sets out under Paragraphs 24-27 that Local Planning Authorities and County Councils have a duty to cooperate on strategic matters that cross administrative boundaries. Paragraph 26 specifically notes that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met within a particular plan area could be met elsewhere. This process within Devon is guided by the Devon Duty to Cooperate Protocol. This protocol includes reference to the development of appropriate housing development strategies across administrative boundaries.

Exeter City Council (ECC) has a duty to cooperate with neighbouring authorities. Moreover, its Local Plan must align with the requirements of the NPPF and synchronise with East Devon District Council (EDDC)'s Local Plan, Teignbridge District Council (TDC)'s Local Plan and Mid Devon District Council (MDDC)'s Local Plan, particularly as it cannot show that it can viably meet its housing and jobs needs on land in its jurisdiction, in our client's view.

At present, ECC is proposing a 20-year Local Plan to meet its development needs without harm. This means that the Local Plan will have to earmark land to meet the required housing and jobs numbers projected for 20 years without significant harm to the climate or the environment. Encapsulated, the Council's present position appears to be that it has decided to meet its own needs on land in its jurisdiction *without* reliance on other Councils. Whilst our client would like to support the Council, unfortunately, they do not believe that this is achievable, or deliverable.

Response

Exeter City Council (ECC) is falling short in its Duty to Cooperate, to responsibly and sustainably identify and allocate the most appropriate land for development. Further work must be done to ensure that the right types of development are deliverable in the most sustainable locations around Exeter (irrespective of whether land is in ECC, TDC, MDDC or EDDC), including on our client's land holdings (Please see Appendix 2).

The plan should be prepared and refined via constant dialogue with adjoining Councils and key stakeholders including landowners. If these key stakeholders are not incentivised to take part in the plan and in development, the plan will probably fail.

5 Year Housing Land Supply

Neither Exeter City Council (ECC) nor neighbouring East Devon District Council (EDDC) have a robust 5-year land supply (*5YLS), as documented by recent appeal decisions (see below).

The shortfall/undersupply in Exeter city has been caused by the longstanding failure of the Council to apply the current local policies holistically and correctly, releasing land sequentially under AP2 and H1.

Exeter City Council's Five-Year Housing Land Supply Statement dated August 2022 which covers the five-year period from 1 April 2022 to 31 March 2027 stated that Exeter has 4 years and 10 months of land supply equating to 3,275 dwellings.

However, since then recent Appeal reference APP/Y1110/W/22/3292721 (25th August 2022) noted the absence of the 5YHLS and placed *significant weight* on the delivery of market housing in the context of the national policy objective to significantly boost the supply of homes and the "*less-than-modest*" HLS shortfall in Exeter.

Moreover, Appeal reference APP/Y1110/W/22/3296946 (11th October 2022) also confirmed that the Council is unable to deliver 5 years' supply of housing land, and that there was no substantive evidence to suggest that the Core Strategy's **minimum** target of circa 12,000 homes would be achieved in the plan period. It concluded that the Council's housing land supply shortfall is, *at least*, moderate.

Response

Our client reluctantly notes that Exeter cannot demonstrate a 5YHLS and that it has failed to deliver its annual housing requirement every year in the plan period bar one year.

Under scrutiny, the Council's Annual Monitoring Report (AMR) shows that on an annualised need of 600 dwellings per annum (so 600 dwellings per annum in a 20-year plan period means that ECC must deliver at least 12,000 houses in the 20-year plan period ending in 2026), ECC acknowledges that it has underdelivered by more than 2,000 houses to date (pro rata).

Paragraph 2.4 of ECC's 5 Year Land Supply Statement says: "Since Exeter's five-year housing requirement is based on the standard method, there is no requirement to specifically address any past under delivery of housing separately when establishing the minimum annual local housing need figure / the five-year housing requirement." And paragraph 2.6 says: "The Council is not seeking to "confirm" its five-year housing supply for a year as set out in paragraph 74 of the NPPF and therefore a buffer of 10% is not applicable. The Council passed the 2020 Housing Delivery Test with a result of 153%, meaning that a buffer of 20% is not applicable. Based on advice in the PPG, it is instead appropriate to calculate Exeter's five-year housing requirement by applying a buffer of 5% to the local housing need figure."

In short, sadly there is a housing delivery issue exacerbating an housing affordability issue, and the city, together with the western part of East Devon, is the area considered to be the economic driver for the sub region, and its growth cannot be constrained for social and economic reasons.

The under supply of housing in the current plan period needs to be correctly documented by the Council and the shortfall should be addressed within the emerging Local Plan (i.e., the shortfall should be added to the numbers required in this plan).

Sites that can accommodate development, such as those owned and controlled by our client (Please see Appendix 2), should be earmarked to accommodate flexible market driven development in line with the city's needs.

Affordable Housing Delivery

Free land, government grants and housing benefit to tenants through a restricted list of affordable housing providers has created a distorted marketplace and taken together led to a failure to deliver enough "affordable homes" in the city, in the current plan period.

Appeal reference APP/Y1110/W/22/3292721 (25th August 2022) noted that Exeter has a demonstrably acute and persistent under-delivery of affordable housing delivering only 6 affordable homes in the last year.

Whatever the reason for this, and our client is not blaming the Council entirely, clearly, the plan should face this issue head on.

Response

ECC has delivered less than 25% of total housing as affordable housing meaning significantly less than 20% as a total expected and required in the plan period. (Set against a 35% policy requirement). In other words, 2,000 houses shy in the plan period has “cost” Exeter C 700 affordable dwellings in the plan period, in a city where the house price to earnings ratio is one of the worst in England (and getting worse).

*The Local Plan must prioritise securing appropriate, **viable** levels of affordable housing within the plan period. (Inspectors often give “significant weight” to undersupply of affordable housing in decision taking).*

Our client’s landholdings can deliver viable mixed-use development which would include affordable housing.

Employment Land

Because Exeter does not have a five-year housing land supply, pressure is being put on the small amount of employment land that is available in the city, and some sites previously allocated for employment have already been granted permission for residential uses. Exeter has lost a significant amount of office accommodation to residential uses under Permitted Development Rights (PDR).

The plan says that it will deliver denser employment uses in a mixed-use environment. However, as it stands, it does not deliver the space or jobs needed for the city (and the existing businesses based there) to expand and grow or provide for existing occupiers of certain uses (B2, B8 for example) to remain.

The displacement of employers and occupiers in the city will create an imbalance with surrounding authorities, worsening the documented (including in Council papers) undersupply of employment land within the sub region.

The consequences of the emerging Local Plan “Vision” should be considered and scrutinised because the “Vision” would have negative economic consequences, certainly in the short to medium terms.

Whilst there are obvious implications for the compatibility of uses, (i.e., industrial vs. residential) in terms of, for example, amenity impacts affecting the future of existing businesses, there is no clear strategy for viably, implementing mixed use in existing “heavy” employment areas such as Marsh Barton.

Response

Simplified, the current proposed Local Plan “Vision” means that either housing will be delivered on existing employment land, displacing existing employment uses (and then land will have to be found for such employment uses), or more land will need to be found for housing because housing will not be delivered on existing employment land.

The only alternative is that the Council demonstrates that it can deliver viable mixed-use development on clearly identified sites in line with its housing and development needs in the plan period. (A “red line” around large swathes of the city including on sites in Marsh Barton, does not lead to the conclusion that the “Vision” is deliverable, sadly.)

*On this, it is short odds on that there would be very lengthy lead in times to assemble, clear, and remediate brownfield land for residential led mixed use developments. Assembling such land for redevelopment involves, as a minimum, **successful** negotiations with owners, head lessees, sub lessees, planning permission, legal agreements, geo technical work, site clearance and a thorough understanding of the uses near the site that is earmarked for mixed use development.*

Whilst brownfield redevelopment is a cornerstone of sustainable development and is an admirable aim that our client fully supports, viably delivering the vast majority of housing (including affordable housing; please see above) and employment numbers required in the plan period largely on brownfield land in a city where employment land values are already close to residential land values, would stifle development, and worsen the documented (including in Council papers) undersupply of housing and employment land in the sub region.

It is reasonable to conclude therefore that greenfield land will need to be released and that development on existing allocations should be brought forward in line with market and city needs. All our client’s land is required for development and its viable development should be fully supported by the Council via pliable Local Plan allocations.

*For the reasons highlighted above including significant aggregated undersupply in the current plan period, Greater Exeter Strategic Plan (GESP) evidence, and the fact that it is easier to deliver development on greenfield land **our client considers that greenfield land will have to supplement brownfield land for allocation, to deliver the levels of development required.***

The Emerging Local Plan Development Strategy / Vision

Exeter's planning policies are significantly out of date and its Local Plan production is in its infancy. Its officially released "Vision" is to develop housing on high performing employment land.

If the ECC Local Plan is found "sound," the current "Vision" for delivering the numbers required would be delivered across brownfield land, a substantial proportion of which is currently existing employment land. The emerging Local Plan prioritises brownfield redevelopment, meaning that amongst other employment sites, that large parts of Marsh Barton (one of Exeter's key employment areas) is proposed for residential/ mixed use redevelopment.

Viability is at the heart of policy making and whilst the brownfield redevelopment aims are laudable, for the emerging Local Plan to be found "sound" the Council will have to demonstrate that such an approach is both viable and deliverable. By this we mean that the Council must show that the proposed widespread loss of employment land is viable, weighed against the housing numbers anticipated, and that there is adequate additional employment and housing land available to meet the employment and housing requirements of Exeter and its surrounding districts.

Response:

*For the reasons highlighted above including significant aggregated undersupply in the current plan period, GESP evidence, and appeal decisions (as above) **it is considered that greenfield land will have to supplement brownfield land for allocation, to deliver the levels of development required.***

All our client's land is required for development and its viable development should be supported via pliable Local Plan allocations.

Our Client's Landholdings

Our client's land as shown in Appendix 2 is suitable and available to meet Exeter's housing and employment needs broadly in line with the issues it faces and its "Vision" papers. All of it is allocated for residential led development in the Core Strategy and our client fully expects it be allocated in the emerging plan.

The land tranches are significant and are all free of restrictive planning constraints. Located to the east of the city, they either form part of, or are close to, the Newcourt urban extension to Exeter.

Policy identifies Newcourt as a location for an urban extension and a sustainable location for housing and employment development, in line with best planning practice of focusing growth where the vast majority of physical, social and community and green infrastructure exists or is planned for.

Our client's application (14/1451/OUT) to the south of Old Rydon Lane to the west of the M5, on land in the adopted Newcourt Masterplan, for up to 392 residential dwellings and associated infrastructure, benefits from a resolution to grant planning permission, and is in the Council's housing growth figures.

Shortly our client will submit a "sister" planning application immediately to the north of Old Rydon Lane for residential led mixed-use development.

Our client supports strategic scale development in this location, however, it has concerns about specific aspects of policy and allocations in the area as follows.

Land at St Bridget's

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

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

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

The Exeter Plan Consultation draft (Please see Ref B3 below) appears to indicate access to St Bridget's (Site Ref 83) should be from the Newcourt Way roundabout.

The HELAA (Please Ref C below) also highlights Newcourt Way roundabout as the primary access for St. Bridget's (Please see Ref C p368 to p372).

It follows that any planning application made on St Bridget's should explore an access from the Newcourt Way roundabout and that such an access should be enshrined in policy making. The plan, backed by clear evidence, should be corrected in this vein.

Land to the North and South of Old Rydon Lane

The HELAA 2022 (Please see Ref C below) shows our client's land at Sandy Park Farm (SPF) (north and south sites) (Site 90) as a "Green " for residential development for up to 950 homes.

However, it also shows land at SPF (north) in Site 89. In other words, the "north" land appears twice: as mixed use (site 89); and solely residential (site 90).

In the Exeter Plan, Site 90 does not appear in the Site Allocations papers. (Please see Ref B4 below). Instead, only the "north" land is shown in the proposed draft housing allocation (and it is "merged" into Site 89 with Sandy Gate).

The land north and south of Old Rydon Lane referred to above is allocated as part of the Newcourt urban extension.

Looking at the HELAA assessment for Site 90 (950 homes), given that the land to the south benefits from a resolution to grant permission for 392 houses, the HELAA assessment suggest that the land to the north could accommodate C550 dwellings (because it says together that the land (north and south) can take 950 dwellings) (and not only 250 across the whole of Sandy Gate).

More realistically, backed by detailed consultancy input and in line with our original HELAA submission made on behalf of our client (i.e., for Site 90), we suggest up to 170 homes and mixed-use employment of 190,000 sq. ft commercial based on land to the north, with 392 dwellings on land to the south, is achievable, viable and deliverable.

The plan should be corrected to show land to the north and south of Old Rydon Lane as one allocation for C 600 homes, C 190,000 sq. ft of commercial development with associated infrastructure.

Land at Newcourt Way Opposite Ikea

Our client's land to the east of Newcourt Way (opposite IKEA) features in the Employment Land Study (Site 29) of August 2022. It is shown as a "Green" for future employment development (as an "Undeveloped Allocation"). However, it is not shown in the plan.

Draft Policy EJ2 (Please see Ref B3 below) appears to only address existing Employment sites and appears silent on "Undeveloped Allocations". EJ2 appears to imply that Undeveloped Allocations could be re-purposed for housing:

"Elsewhere, the loss of employment land to an alternative use will be acceptable where land is allocated for redevelopment or where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040 or where current employment uses have an unacceptable amenity impact on local residents"

The plan should be corrected to specifically say that all "Undeveloped Allocations" identified within the Exeter Employment Study are included in the relevant policies and clearly identify our client's land as a separate mixed-use allocation. (It is allocated in the Core Strategy).

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

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

Thank you.

Yours faithfully,

James

James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client

For The Pratt Group

References

A: Strategic Brownfield Sites Study, LDA Design, January 2018 (Appendix A)
<https://devoncc.sharepoint.com/:b:/s/PublicDocs/Planning/EZAUrP2zAcBDiqat7miaakRUBt0lrkxCUBR6H7Hrtag9L-Q>

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

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

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

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

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

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

APPENDIX 1. TABLE OF RESPONSES

	17001 The Pratt Group Strategic Land at Sandy Park Farm and Adjacent to the A379
S1: Spatial strategy The spatial strategy will deliver on Exeter's Vision 2040 including the city's ambitions for net zero, health and wellbeing and the vitality of the city centre. Proposals are identified and will be supported when they: 1. Provide enough good quality homes of a variety of types in the Exeter City Council area to meet Exeter's needs. 2. Bring forward new forms of employment provision in the city and work with neighbouring Councils to ensure the employment needs of the wider functional economic market area are met. 3. Focus most development on large, strategic brownfield sites, particularly in locations close to the city centre, district centres, local centres, and key public transport hubs with good access to green infrastructure including the Valley Parks. 4. Enable the development of smaller brownfield sites as they become available. 5. Consider modest, greenfield development as a supplement to brownfield development. 6. Protect the sensitive Exe Estuary and the sensitive hills to the north and north-west of the city.	1. For the plan to be sound the Council should plan to build significantly more houses than 650 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) 2. The aim of this part of the policy is noted in terms of ensuring greater flexibility, growing different industries but the strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include longstanding successful industrial areas and uses. Where will the displaced industrial/commercial uses go? How will the displacement be managed to ensure that it does not impact negatively upon the economic growth of Exeter? Either the Plan will be found sound and housing will be delivered on existing employment land, displacing existing uses, or the plan will be found unsound and additional land will need to be found for housing. Reasonable therefore to conclude that greenfield land will need to be released. 3. The Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. 4. To expect most of the development to be sited on large, strategic brownfield sites is unrealistic Remediation of brownfield land must be considered re: effect on viability. 5. Noted and supported - as above greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour. 6. Land to the north of Exeter must not be arbitrarily protected, all sustainable and deliverable land must be considered.

7. Steer development to avoid areas of higher flood risk where possible and manage residual flood risk as appropriate. 8. Enable development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement. 9. Provide high-quality, mixed-use development at optimal densities to minimise the need to travel and maximise walking, cycling and public transport. 10. Deliver the range of infrastructure needed to support high quality development and our communities in a timely manner.	7. Noted. 8. Noted and supported. 9. Noted and supported. 10. Noted and supported, but clarification of the definition of 'optimal' needed and clarification as to how this will sit alongside requirements for adaptable dwellings which typically require larger floor areas and ground floor accommodation, the requirement for home offices and Exeter specific space standards which may require larger dwellings to accommodate these provisions. 11. Consideration needs to be given as to how this may affect viability.
S2: Liveable Exeter delivery principles The delivery of large-scale, brownfield developments will be supported. Planning applications for all large-scale development proposals must be accompanied by a masterplan which includes a vision and planning/design framework to guide the comprehensive development of the wider site area. All large-scale development proposals must demonstrate how each of the following Liveable Exeter principles and requirements will be achieved. Principle 1: Memorable places. Development	To expect most of the development to be sited on large, strategic brownfield sites is unrealistic, and greenfield land both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. The point regarding making efficient use of land is noted and supported. This appears to correlate with the point about "optimal densities" and clarification will be required as to how this sits alongside the requirement for adaptable dwellings which typically require larger floor areas and ground floor accommodation, the requirement for home offices and Exeter specific space standards which may require larger dwellings to accommodate these provisions. In addition, more space will be required for shared road networks, pleasant streets with street furniture. All of which will add to the land take of development and potentially prevent a 'compact' development. The point regarding the provision of a variety of high-quality homes and local jobs is noted and supported. However, the strategy for house building in Exeter relies heavily on the

Principle 2: Outstanding quality. Development Principle 3: Welcoming neighbourhoods. Development Principle 4: Liveable buildings. Development Principle 5: Active streets. Development Principle 6: Spaces for people and wildlife.	redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan does not show will such uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. The Plan does not show how quality homes be provided alongside noise and odour generating B2 and B8 uses. The provision of homes that are dual aspect will be more difficult for higher density developments such as flats/apartment blocks. Will the term 'predominantly' be quantified and defined? Matters like cycle parking, storage, electric vehicle infrastructure, areas for play, food growing etc will need to be quantified and consideration given to how the provision of all these matters will affect the viability of developments.
CE1: Net zero Exeter	The Local Plan must prioritise development in sustainable locations to minimise car travel etcetera.
CE2: Local Energy Networks	Consideration needs to be given to how such measures will impact the viability of developments coming forward.
CE3: Flood risk	Noted and supported.
H1: Housing requirement Exeter City Council will target the delivery of at least 650 homes per year between 2020 and 2040. To meet this target and allow for a headroom of 10%, delivery of 14,300 homes is proposed from the following sources:	For the plan to be sound the Council should plan to build significantly more houses than 650 per annum, helping to meet ECC's development needs and creating plan resilience over time (in terms of e.g., housing land supply and the affordability of new homes) The site allocation strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan does not give any detail on how such uses sit alongside residential

• 2,024 completions in 2020/21 and 2021/22 • Approximately 5,380 homes from existing planning consents • Approximately 6,205 homes on site allocations • Approximately 691 homes on windfall sites	dwelling without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. Will such homes be considered quality homes? To expect most development to be sited on large, strategic brownfield sites is unrealistic and greenfield land (beyond the modest sites) both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. The remediation of brownfield land will affect the viability of development and so deliverability.
H2: Housing allocations	See response for policy H1 and EJ2.
EJ2: Retention of employment land The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use will be acceptable where land is allocated for redevelopment or where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040 or where current employment uses have an unacceptable amenity impact on residents.	Previous policy H2 suggests that Marsh Barton, for example, will be a mixed-use site but this policy suggests that the whole site has the potential to be redeveloped outside of employment uses. If the whole of a site was earmarked for redevelopment and came forward as a full residential proposal, how would this effect employment land supply and jobs? This policy would appear to allow a complete redevelopment of an employment site to residential development, which is not sustainable. New residential developments alongside existing employment uses could lead to situations where employment uses are forced to vacate due to pressure from nearby residents due to an impact on amenity. This policy could render those sites earmarked for mixed uses being fully redeveloped for housing.
EJ3: New forms of employment provision	Policies S1 and S2 refer to making efficient use of land and optimum densities. Policy S2 also refers to adaptable dwellings. This policy refers to all large-scale developments incorporating work hubs, collaborative workspaces, and live work units. The supporting paragraph suggests this could mean all new homes having home offices or designed to facilitate home working. Optimal density and space standards will need to be defined taking the additional provisions

	within new homes into account. Assuming this will result in the need for larger dwellings, how will this effect affordability?
STC1: Sustainable movement	The intention to redevelop existing employment sites to mixed use developments is unrealistic considering the wording of policy EJ2. While the intention may be to provide mixed use developments on these sites to accord with policy STC1, policy EJ2 could 'undo' this by later allowing the further redevelopment of previously retained employment uses due the impact of these uses on residential amenity of new homes in these locations. Will such developments remain sustainable without the employment uses in walking distance?
STC4: Public transport proposals	Our client supports the provision and enhancement of sustainable modes of transport. Consideration needs to be given to the viability of developments where such contributions are required especially where they are required in the early phases of development proposals.
NE1: Landscape setting areas	Noted. However, greenfield sites will need to be identified within and adjacent to Exeter to supplement brownfield projects if the plan is to be found sound. Sites within Landscape Setting Areas may represent a sustainable form of development where harm is localised, appropriately mitigated and where such developments are located adjacent to the settlement boundary, and this should be recognised within the Plan.
NE2: Valley Parks	These must be brought forward with stakeholder/landowner input for them to be deliverable.
NE3: Biodiversity	The requirement for 10% biodiversity net gain could render many developments unviable especially where they are vegetated (even in urban areas). Where biodiversity net gain is required, there will need to be recognition within the plan that other contributions/policy requirements may not be provided. There will need to be mechanism to set out the priorities for contributions.
NE4: Green infrastructure	Consideration needs to be given to the viability of developments because of these requirements and others in the plan. Clarity required on what would necessitate contributions towards green infrastructure and gateway access points.

D1: Design principles	Policy states that planning permission will be granted for development that... ‘Contributes to the provision of a compatible mix of uses which work well together to create vital and viable places; retains and refurbishes existing buildings of good townscape value’ compatible with site allocations for the redevelopment of existing employment sites to include residential uses? Existing industrial uses (B2 and B8 uses) are unlikely to be compatible with residential uses yet a high proportion of the housing land supply relies on the redevelopment of existing employment sites. The policy states that planning permission will be granted for development that... ‘Ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale.’ However, paragraph 3.10 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area on most sites. The Plan doesn’t demonstrate that these two aims/objectives are compatible.
H1: Health and wellbeing	The policy states that ‘Developments will make financial payments towards improved health infrastructure commensurate with any additional demand placed on the existing provision.’ This requirement will need to meet the tests of planning obligations and requests well evidenced. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC1: Delivery of infrastructure	The policy states that developer contributions will be sought through the community infrastructure levy and section 106 to ensure that the necessary physical, social, economic, and green infrastructure is in place to deliver development. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC2: Community facilities	Consideration needs to be given to the viability of developments because of these requirements and others in the plan. How will additional demand be calculated? Will the calculation be based on an expected level on in-migration to Exeter vs. those moving within the city?

Site Allocations	
Sandy Gate – Site Reference 89	What we say above under Client’s Landholdings in particular refers. The plan, backed by clear evidence, should be corrected to ensure that any planning application made on St Bridget’s should explore an access from the Newcourt Way roundabout. The plan should be corrected to show land to the north and south of Old Rydon Lane as one allocation for C 600 homes, C 190,000 sq. ft of commercial development with associated infrastructure. The plan should be corrected to specifically say that all “Undeveloped Allocations” identified within the Exeter Employment Study are included in the relevant policies and clearly identify the land at Newcourt Way Roundabout as a separate mixed-use allocation.

APPENDIX 2. Client's Landholdings

LAND AT OLD RYDON LANE



LAND ADJACENT TO IKEA

