

Exeter Plan: City Centre Boundary

Exeter St James Community Trust response to that provided by Exeter City Council to the Trust's 'Boundary Correction Note' (PS3: G-29, Appendix)

1. Introduction

1.1 Exeter St James Community Trust (the Trust) has reviewed Exeter City Council's (ECC) response to its Boundary Correction Note (PS3: G-29 Appendix), published as EXM-10: *ECC City Centre Boundary Note*.

1.2 ECC rejects the Trust's position that the Exeter Plan Regulation 19 Policies Map introduces a materially different City Centre Boundary from that in the adopted Local Plan First Review (2005). ECC asserts that the southern part of St James has been included within the city centre '*for at least 20 years*'.

1.3 ECC further argues that the stylised map in the Exeter St James Neighbourhood Plan (NP) cannot redefine an area already included in a Local Plan.

1.4 ECC maintains that the proposed boundary is appropriate and continues to support the concentration of purpose-built student accommodation (PBSA) within it.

1.5 This note responds to EXM-10 and clarifies why the Trust considers ECC's position to be factually and procedurally incorrect.

2. Whether the 2005 Local Plan Contained a Single 'City Centre Boundary'

2.1 Absence of a unified boundary in the adopted plan

2.1.1 ECC invites comparison between Appendix A and Appendix B, asserting that both Local Plan 2005 and Exeter Plan Regulation 19 depict the same city centre boundary.

2.1.2 However, examination of the Local Plan First Review Written Statement and the online GIS Proposals Map (2004) shows **no evidence of any single, unified 'city centre boundary'** in the adopted plan.

2.2 The red line in Appendix A is not policy-related

2.2.1 The key to Appendix B correctly identifies the red line as the visual representation of Exeter Plan strategic policy RFC1.

2.2.2 By contrast, the key to Appendix A labels a red line as 'City Centre Boundary' but **does not link it to any adopted policy**, and no such boundary appears as a selectable policy layer in the online Proposals Map.

2.2.3 A recently added GIS checkbox labelled “City Centre Boundary” reproduces the same red line, but this layer is **not policy linked** and appears to be a **digitisation artefact**, not an adopted policy designation.

2.3 What the adopted plan actually contained

2.3.1 Within the loose concept of a city centre / central area, the adopted plan included several **distinct, purpose-specific designations**, each with its own boundary:

- S1 Primary Shopping Area
- S2 Secondary Shopping Area
- H2(d) Housing Core Area (car-free requirement)
- C1 Conservation Area: Central
- KP1 Pedestrian Prioritisation Zone

2.3.2 Only one of these—the **Housing Core Area**—extends into the same southern part of St James as the Exeter Plan RFC1 City Centre, and the Written Statement confirms its purpose is limited to car-free development under H2(d). It is **not** a city-centre-wide designation.

2.4 The dual-labelled H2/S1 GIS layer

2.4.1 Currently viewable on the online Proposals Map is a further City Centre policy layer labelled ‘H2 Location Priorities – City Centre / S1 Retail Proposals – City Centre’.

2.4.2 This shows a hatched area that matches the extent of the Exeter Plan’s proposed City Centre Boundary, but **no boundary line is shown**, and the Written Statement for H2 and S1 contains **no explanation** of this visual representation.

2.4.3 H2 is non-strategic; S1 is strategic but already has its own mapped primary and secondary shopping areas and these do not reappear on this layer. The hatched area therefore **cannot be treated as a unified city centre boundary**.

2.5 ECC’s reconstructed map reinforce the Trust’s point

2.5.1 Appendix A is **not an extract** from the adopted Proposals Map as its title states, but a **reconstruction** superimposed on a 2024 base map.

2.5.2 The presumed compilation of multiple policy-specific areas into a single outline for which no specific policy representation is identified, **demonstrates that the adopted plan did not contain a single city-centre-wide spatial unit**.

3. Relevance of the CIL Charging Schedule

3.1 ECC cites the 2024 Community Infrastructure Levy Charging Schedule (EXM-02m, p.6).

3.2 This document is **not part of the adopted Development Plan** and cannot be relied upon to evidence a historic city centre boundary.

4. Relationship with the Neighbourhood Plan

4.1 ECC's assertion regarding NP conformity

4.1.1 ECC states that a Neighbourhood Plan cannot redefine an area already included in a Local Plan.

4.1.2 The Trust agrees. This is precisely why the Examiner of the NP—having assessed the Local Plan First Review and identified its strategic policies—accepted without hesitation that **St James and the city centre were adjacent but not overlapping**.

4.2 ECC's opportunity to correct any overlap

4.2.1 When the Forum applied for Neighbourhood Area designation (May 2012), ECC had full opportunity to amend the proposed boundary.

4.2.2 The application explicitly stated that no overlap with existing designations had been identified.

4.2.3 Had an adopted city-centre-wide spatial designation existed, ECC would have been obliged to correct the boundary before consultation. It did not do so.

4.3 Consequences had ECC been correct

4.3.1 If a unified city centre designation had existed and had been overlooked by both ECC and the NP Examiner, the NP—being the more recent development plan document—would have taken precedence for the overlapping area.

4.3.2 This reinforces the point that **no such adopted designation existed**.

5. Introduction of a New Functional City Centre Role

5.1 The issue is not merely the boundary line

5.1.1 ECC frames the Trust's concern as relating primarily to PBSA. This is one of a number.

5.1.2 The Trust's concern is broader: the Exeter Plan introduces a **new, strong, functional city centre role** across the entire area within the proposed unified boundary—something the adopted plan does not contain.

5.2 Impact on the St James Local Community Hub

5.2.1 The NP (pp.27–28) designates and protects the St James Local Community Hub through Policy C4.

5.2.2 Exeter Plan paragraph 8.14 states that a review of local centres has been undertaken, yet the Policies Map omits the NP's statutorily designated local centre.

5.2.3 This omission indicates that the NP's spatial designations have **not been assessed** in preparing the Exeter Plan.

5.3 Impact on St James Local Green Space

5.3.1 The NP (pp.21- 22) designates Queen’s Crescent Garden (QCG) as Local Green Space, an important asset located within the Local Hub.

5.3.2 QCG is of such significance to the community that the Trust was set up to enter a 125 year lease agreement with the Council enabling the regeneration of the space according to a Community Masterplan for local community use and to renew a sense of neighbourhood community pride, identity and cohesion.

5.3.3 NP (p, 21) describes the Garden as ‘*Located away from the busy city centre and close to several important local community facilities*’ and protects it under Policy EN3.

5.4 Wider impacts within St James

5.4.1 A significant area of St James—far beyond the Community Hub—falls within the proposed City Centre.

5.4.2 This includes a number of St James residential streets that are protected by an Article 4 Direction removing permitted right to change of use from C3 to C4, supporting outnumbered local residents impacted by community imbalance.

5.4.3 It includes the Howell Road car park (NP p30) identified in relation to NP Policy SD3 as a potential future windfall site suitable for affordable homes for local people, while retaining sufficient parking space to support local businesses.

5.4.4 Under Exeter Plan RFC1’s designation, with the significant effect it would have on interpretation of supplementary planning documents, uses such as PBSA or night-time economy venues and development of city centre appropriate scale and intensification would be supported, representing a **material change** in policy direction.

5.5 ECC’s stated ambitions for the new City Centre

5.5.1 RFC1’s preamble supports diversifying uses, extending hours of activity, and enhancing the night-time and visitor economy.

5.5.2 Paragraph 8.10 confirms work on a new city centre strategy covering living, working, studying, and socialising.

5.5.3 These statements confirm that the Exeter Plan assigns a **new functional role** to the area.

6. Summary and Questions for the Inspectors

6.1 All the evidence available to the Trust confirms that Exeter Plan introduces a new City Centre spatial designation that encroaches on part of St James resulting in serious conflict of function and character.

6.2 However, were ECC correct that this unified city centre area has existed since 2005, NP (2013) designations would take precedence where conflict arises, being the more recently adopted Local Development Plan document, and—by ECC’s own logic—**the Exeter Plan cannot now redefine an area already included in a development plan**, including the designated St James Neighbourhood Area.

6.3 The Trust represents a community that adopted its NP with a 92% majority. If the Exeter Plan were adopted with the proposed boundary and functional designation, its policies would override those of the NP, contrary to the Liveable Exeter Principles Document (EVB-S-01b, p.10) which ECC claims underpins the Exeter Plan, and which stresses: *‘To deliver the Exeter Vision 2040, it is essential to strengthen existing neighbourhoods’*.

6.4 The Trust therefore respectfully asks the Inspectors to clarify:

- **Which specific 2004/05 policy designations are being relied upon to justify the claim that the area has been part of the “city centre” for 20 years; and**
- **Whether the functional role assigned to this area in the Exeter Plan is genuinely a continuation of past policy, or a material change requiring explicit justification and assessment of its impact on St James.**