

This file has been cleaned of potential threats. To view the reconstructed contents, please SCROLL DOWN to next page.

If you confirm that the file is coming from a trusted source, you can send the following SHA-256 hash value to your admin for the original file.

2338f5c0c9ba59ad28404836add6e00f1fe45e212f06369bf62c78a2076c1f34

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

STC 1

Policies Map

proposed site
allocations

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Some of the policy measures outlined in the strategic policy are not consistent (not effective), weak (not justified) or vague (not effective), in supporting the policy goal set out in the preamble to the measures.

Clause a) **Spatial strategy**

Delivering on the **spatial strategy** by supporting development in locations which '*minimise the need to travel*' does not consider NPPF para 108 in the round; and is vague e.g. minimise whose need to travel? and could undermine other policies in the Plan (e.g. health and activity).

The emphasis on the spatial strategy on brownfield sites first is a focus for new development that intensifies development and provides for, and attracts large numbers of people in the city centre (wider) area where active travel is easier¹. This reduces the need for private motorised car use and trip length, co-location of facilities is possible, highway routes can be safeguarded and connections to public transport are easier. The adopted approach to implementing the spatial strategy should, however, more explicitly define as a policy principle, the *Avoid-Shift-Improve*² approach for integrated, inter-modal and balanced approaches to achieve sustainable, low carbon travel and transport. This approach is shown to be effective in reducing carbon emissions³.

The policy and spatial strategy does not recognise or address the **risk of transport related social exclusion** which is a limit on the sustainable and inclusive growth of the city and effectiveness of policy STC 1 and the Liveable Exeter principles. "*Transport-related social exclusion (TRSE) means that transport issues have a fundamental impact on everyday life, and limit the ability to fulfil everyday needs. This could mean being unable to access childcare or good job*



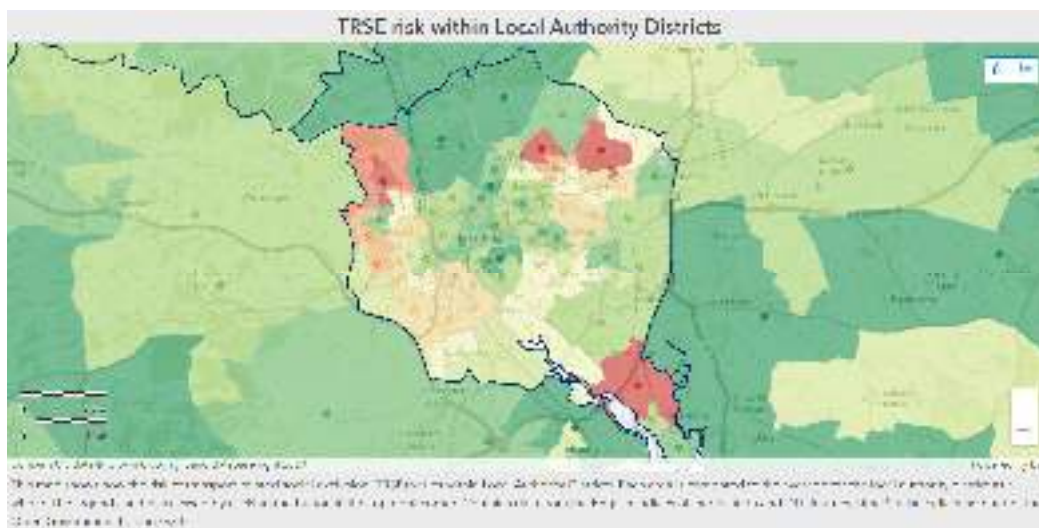
¹ [Transport Evidence Base](#)

² [Home - SLOCAT](#)

³ [202202251552---SLOCAT Transport and Climate Change Global Status Report_Global Overview.pdf SLOCAT Partnership |](#)

opportunities, facing poverty and financial hardship because of transport costs, or facing significant stress and anxiety from using the transport system as part of everyday life.⁴

A comparison can be made between the Exeter Plan spatial map and map showing the transport related social exclusion risk in Exeter. The policy set out in b) is modified by 'where appropriate' which undermines the overarching policy, meaning these areas are likely to remain excluded as there will be a reduced expectation to provide the appropriate measures set out in b.



A few of the areas in these strategic sites and HEELA overlay with these areas of TRSE, for example Topsham near the M5 (sites 91-94 for instance) which has *"TRSE in this neighbourhood is **102% above** the average for Exeter. This is based on access to key destinations, transport inequalities, and vulnerability to social exclusion. Compared with Exeter as a whole, this neighbourhood has: Access challenges: 78% above average⁵"*

A number of areas which have also been approved for development and included in the housing supply numbers, but are yet to be developed are in other high risk areas including land in Beacon Heath/Mincinglake (red area to North) and land surrounding Exwick to the West.

The policy should therefore place an emphasis on enabling transport inclusion in the design and delivery of transport and travel plans and infrastructure and connection to key services such as schools. For example the proposed bus routes in policy STC4 are all linear into and out of the city.

There is no orbital route around the city which for example might connect Exwick to West Exe School and many areas to St James School or the employment area at Pynes Hill. Travelling in and out of the city on more than one bus is prohibitive.

It is noted that paragraph (e) **public transport network**

- is doubtful that it is effective as it cannot be achieved by the city council, since there are no realistic planning / development demonstrated in the policy. Achievement can only be delivered by the bus and rail operators, the local transport authority (Devon CC). The Councils have a track record of failure to cooperate in this regard in relation to the development and delivery of the BSIP. For instance the planned improvements to bus lanes have failed to be delivered.
- This clause is weak with a lack of focus on improving the bus infrastructure for example shift to Electric buses and improving bus shelter and information systems to improve the user experience and development of services in areas of spatial exclusion.
- There is no mention of the importance of integration between public transport modes and enhancing infrastructure to improve access for instance supporting disability access at St Thomas or Polsloe stations and improving infrastructure at bus/rail interchanges.
- Exeter is the epicentre of a significant travel to work area, however this is not mentioned in the strategic policy, it just mentions 'key destinations' through the day'. Explicit reference is

⁴ [Transport-related social exclusion in England](#)

⁵ [TRSE risk by local authority districts](#)

require for a coherent and integrated public transport plan to enable resilient mass transit and link and rider in order to reduce burdens on the highways networks as a result of development within and beyond the city.

The policy does not mention a coherent and coordinated approach to parking management across the city, only in relation to individual developments. Currently there are different tariffs and parking management zones and approaches to parking management across the city which on the current basis will undermine the strategic policy objective of STC1. Such an approach would accord with NPPF para. 111

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Amend (amendments in bold) to improve soundness and deliverability of policy objectives:

- a. Delivering on the spatial strategy by supporting development in locations which **minimise the need for travel in particular motorised trips based on proximity and accessibility to facilities, services and employment, enable a modal shift to public transport and active travel and improve the infrastructure and efficiency of transport modes and routes.**
- 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.
- d. Supporting a healthy, active city **and reduces transport related social exclusion** 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, **public transport** and emerging modes;
- e. Achieving a reliable, low carbon, frequent and attractive standard of public transport within the city, to ~~and to key destinations elsewhere beyond the city and [form part of a wider Link and Ride/Devon Metro service]~~ throughout the day;

Add to improve soundness and deliverability of policy objectives:

k. achieve a consistent and coherent approach to parking management across the city.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

No

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Development and delivery of the BSIP as the two Councils have failed to work effectively together to deliver the plan to date.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>
