



Ed Freeman
Blackdown House,
Heathpark Industrial Estate,
Honiton
EX14 1EJ

**Civic Centre, Paris Street, Exeter, EX1 1JN,
www.exeter.gov.uk**

Please ask for: Ian Collinson

Telephone: 01392 265080

Email: planning.policy@exeter.gov.uk

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Dear Ed Freeman,

Re: East Devon Draft Local Plan Consultation (Regulation 18)

Thank you for the opportunity to comment on the East Devon Local Plan Preferred Options Regulation 18 Consultation. This letter provides the response of Exeter City Council. It should be noted that the response has not yet been considered by the Council's Executive. This will take place on 7th February 2023. The response has been discussed by lead Councillors.

The response is split into sections covering the following topics:

- Compatible spatial strategies and delivering net zero
- Duty to cooperate
- Cross-boundary development impacts
- Employment provision
- Transport provision
- Joint European sites mitigation strategy
- Development sites on the edge of Exeter

Compatible spatial strategies and delivering net zero

The emerging spatial strategy for Exeter is set out in the Outline Draft Exeter Plan. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape setting and retain Exeter's environmental quality. This strategy will also help to achieve the City Council's net zero 2030 target, enable nature recovery, continue Exeter's economic success and support a healthy and inclusive city. This transformational approach is closely aligned with the Government's Levelling Up policy which aims to reduce inequalities and promote opportunities for all.

Whilst delivering Exeter's spatial strategy and approach to delivery will not be straightforward, it is necessary to address the challenges we face and to delivery net zero. East Devon is facing similar challenges and we support the emphasis in the consultation on tackling the climate emergency and responding to climate change. Maximising the development of brownfield sites first should be a key element of the spatial strategy to help tackle the climate emergency, acknowledging the limited supply of brownfield land in the District. We also welcome an emphasis on new and innovative forms of planning and delivery to ensure new developments, in particular any new settlements, are carbon neutral. Together, these approaches would help the wider area to achieve its net zero ambitions.

Duty to cooperate

Strategic policy-making authorities are required to cooperate with each other when preparing policies which address strategic matters. There are a number of such matters identified in the East Devon Local Plan consultation document. The City Council considers that the following matters are of relevance to the relationship between East Devon and Exeter. Most of these are identified in the consultation document:

- The collective strategic response to the climate emergency
- Development strategy and cross boundary development impact mitigation
- The partnership approach to mitigating development impact on European sites
- Landscape setting
- Employment strategy
- Transport strategy
- Education strategy
- Community facilities (health, education and cultural infrastructure)
- Flood risk and coastal change management.

In due course, a statement of common ground should document these cross-boundary matters and set out how they are being addressed. The emerging Joint Strategy for East Devon, Exeter, Mid Devon and Teignbridge also identifies an overarching common approach that will address some of these matters. We look forward to continuing to work together in consider these issues.

Cross-boundary development impacts

There is a series of proposed allocations on the edge of Exeter or close to the City boundary which will require significant cross-boundary partnership working to ensure high quality development comes forward in a managed way which complements the proposals in Exeter. Looking generally, habitat mitigation, landscape impact, infrastructure delivery, transportation and wider discussions on housing and employment strategy and place making will be matters requiring close partnership working and strategic approaches going forwards.

The City Council notes the proposed development strategy for East Devon and the inclusion of continued development on the edge of Exeter with the potential to accommodate a further 580 homes within an area to the north of Topsham. It will be vital to work in partnership with the City Council to ensure how this proposal can come forward in an appropriate way to minimise impacts on Exeter and Topsham whilst providing an attractive environment.

It will be important for the proposals within the city to be considered alongside the proposals in East Devon, on the edge of the city, to ensure development is planned for strategically, recognising cross-boundary impacts and opportunities. Proposals in East Devon on the edge of the city will need to come forward in a consistent manner with those nearby proposals in the city, embracing innovative forms of planning and delivery to ensure high quality development is provided.

The City Council also specifically recognises the proposals for a new community in the vicinity of Clyst St Mary to eventually accommodate around 8,000 homes. Significant cross boundary discussions will be required to understand the impact of this development in particular. This will build on the existing transportation discussions which are already taking place alongside Devon County Council and National Highways. Going further it is vital that we deliver a consistent approach to infrastructure planning and ensure that our respective Infrastructure Delivery Plans capture items that require cross boundary investment. A strategic agreement on how to manage and fund transportation, education, health, community and utilities infrastructure will be needed together with further discussions regarding habitat mitigation.

Employment provision

A key consideration will be coordinated thinking regarding employment provision in Exeter and on the fringe of the city in East Devon to recognise the functional economic geographies in the area.

Looking specifically at some of the emerging evidence, Exeter is likely to see potential growth in key transformational sectors such as data analytics, environmental futures, health innovation and digital communications, sectors which now form vital elements of the economic development strategy for the city and wider area. There are opportunities for accommodating the full range of employment sectors, including industrial and distribution uses, on a strategic basis across the wider functional economic area to ensure the full range of employment needs are met.

The City of Exeter has significant economic and employment growth potential, but it cannot all be accommodated within the city, given the constrained supply of employment land, and little scope for new potential employment sites. Some of the future economic growth stimulated by the City of Exeter will need to be accommodated in its hinterland in adjoining local authority areas, where they are functionally part of the city. Future employment growth in areas adjoining the City of Exeter (the city fringe) has the potential to help manage commuting into Exeter itself providing a foundation for sustainable development in East Devon. We look forward to continuing to work in partnership to ensure development delivers for the wider functional economic area.

Transport provision

As already alluded to, the allocation of development sites close to Exeter within the East Devon Local Plan will require continued close partnership working with Exeter City Council, Devon County Council and National Highways. This will need to ensure that appropriate transport provision is made to mitigate development impact and maintain the continued strategic functionality of the local and strategic highway networks. This will also help to ensure that Exeter can continue to play its vital role as the driver of growth for the wider area. This work will need to take account of development proposals in the emerging Exeter Plan to ensure a coordinated position.

A strategic approach will be required to ensure that the concepts and projects set out in the Exeter transport strategy are supported and delivered to promote active and sustainable travel to minimise car trips, help support air quality improvements in the city and play a key role in achieving carbon targets. More strategic interventions may be required, particularly on the strategic road network. Ongoing discussions should feed into coordinated infrastructure planning and infrastructure delivery.

Joint European sites mitigation strategy

Development proposals within East Devon need to be considered alongside development proposals in Exeter City Council and Teignbridge District Council to assess the in-combination impacts on European Sites (in accordance with the Conservation of Habitat and Species Regulations 2017 as amended). In terms of addressing these impacts, the updated Joint European Sites Mitigation Strategy will be key. We look forward to continuing to work in partnership to bring this forward.

Development sites on the edge of Exeter

Development next to the M5 and north of Topsham

The development proposed to the north of Topsham seeks to take advantage of the proximity of the city. Development in this area should be considered comprehensively alongside emerging allocations in the Exeter Plan to help protect the sensitive landscape to the east of Clyst Road and also help address transportation, education, utilities, green infrastructure and place making-issues.

Policy and supporting text should emphasise that development should be brought forward in accordance with a comprehensive access strategy and should also seek to protect the sensitive Clyst Valley. We look forward to continuing to work together to address transportation, infrastructure and landscape issues.

New settlement in the west of the district

The proposed new town, close to the boundary with Exeter, will have significant implications for the strategic road network and wider transport infrastructure. Achieving a balance between homes and jobs and providing the facilities and infrastructure that a new community requires is essential to ensure additional pressure on the highway network into Exeter is avoided.

Any new settlement needs will need to employ innovative forms of planning and delivery to achieve net zero. There are many challenges in delivering a new settlement fit for the future and we look forward to working in close partnership to try to address these challenges.

Depending on which sites on the edge of Exeter are included in the next stage of the East Devon Local Plan, off-site transportation and infrastructure may be required within the city to help mitigate development impact. If this is the case, appropriate and proportionate developer contributions either through s106 or CIL will be required from developments located in East Devon. Ongoing and comprehensive cross boundary infrastructure planning is essential to ensure that development impact is mitigated appropriately.

I hope these comments are helpful in progressing the East Devon Local Plan and we look forward to working with you on the various matters set out in this response. If you have any questions please do not hesitate in contacting me.

Yours sincerely



Ian Collinson
Director of City Development