



## **Statement of Consultation**

### **Exeter Development Delivery Development Plan Document (DPD)**

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning)(England) Regulations 2012

Regulations 17, 18, 19 and 22

#### **1. Introduction**

- 1.1 This statement has been prepared in accordance with Regulations 17, 18, 19 and 22 of the Town and Country Planning (Local Development) (England) Regulations.
- 1.2 Consultation undertaken before local plan publication:
  - The 'Have your say' consultation (July - Sept 2012)
  - Consultation on the 'Draft Development Delivery DPD' (Dec 2013 – Feb 2014)

#### **2. Which bodies/persons were invited to make representations under Regulation 18?**

- 2.1 The 'Have your say' consultation document was published on Monday 23 July and consultation closed, ten weeks later, on Friday 28 September 2012.
- 2.2 The consultation on the Draft Development Delivery DPD commenced on the Monday 16 December 2013 and closed, ten weeks later, on Friday 21 February 2014.

- 2.3 The specific consultation bodies are listed below:

Bishops Clyst Parish Council  
Bramford Speke Parish Council  
Broadclyst Parish Council  
BT Group Plc  
Clyst St George Parish Council  
Coal Authority  
Devon County Council  
Devon Primary Care Trust  
East Devon District Council  
EDF Energy  
English Heritage (now Historic England)  
Environment Agency  
Exminster Parish Council  
Highways Agency (now Highways England)

Holcombe Burnell Parish Council  
 Homes and Communities Agency  
 Huxham Parish Council  
 Ide Parish Council  
 Marine Management Organisation  
 Mid Devon District Council  
 Mobile Operators Association - MONO Consultants Ltd  
 Natural England  
 Network Rail  
 NHS South West  
 Office of Water Services  
 Office of Rail Regulation  
 Orange  
 O2 UK Ltd  
 Poltimore Parish Council  
 Shillingford St George Parish Council  
 South West Water  
 Stoke Canon Parish Council  
 Teignbridge District Council  
 T-Mobile  
 Transco  
 Upton Pyne Parish Council  
 Vodafone  
 Western Power Distribution  
 Whitestone Parish Council  
 Woodbury Parish Council

- 2.4 A full list of bodies and persons invited to make representations under Regulation 18 can be found in Appendix 1.

### **3. How those bodies and persons were invited to make such representations**

- 3.1 Both stages of consultation, the 'Have your say' and consultation on the 'Draft Development Delivery DPD', were undertaken in accordance with the Council's Statement of Community Involvement.

#### **Have your say**

- 3.2 In connection with the 'Have your say' consultation the following methods were used to notify stakeholders and members of the public:

- Letter or email to every person and organisation on the Exeter Local Development Framework database, including relevant specific and general consultation bodies, Councils and Parish Councils adjoining Exeter City Council, residents and other persons carrying on businesses in the area.
- Press Release
- Newspaper Notice
- Article placed in the Exeter Citizen
- Information on the Council web site
- Permanent exhibition in the Civic Centre reception
- Posters advertising consultation and public exhibitions

In addition, four public exhibitions were held at the following venues:

- Countess Wear Community School, Glasshouse Lane - Tuesday 31<sup>st</sup> July 3pm - 7pm
- Exwick Heights Primary School, Exwick Lane, Exeter - Thursday 2<sup>nd</sup> Aug 2012 3pm - 7pm
- Alphington Primary School, Wheatsheaf Way, Alphington - Tuesday 7<sup>th</sup> Aug 2012 3pm - 7pm

- Willowbrook School, Summer Lane, Beacon Heath - Thursday 9<sup>th</sup> Aug 2012 3pm - 7pm

### **Draft consultation**

3.3 In connection with the consultation on the draft 'Development Delivery DPD' the following methods were used to notify stakeholders and members of the public:

- Letter or email to every person and organisation on the Exeter Local Development Framework database, including relevant specific and general consultation bodies, Councils and Parish Councils adjoining Exeter City Council, residents and other persons carrying on businesses in the area.
- Press Release
- Newspaper notice
- Information on the Council web site
- Permanent exhibition in the Civic Centre reception
- Posters advertising the consultation and the exhibition venues

In addition, four public exhibitions were held at the following venues:

- Exwick Community Centre, Kinnerton Way - Tuesday 14 Jan 3pm - 7pm
- Countess Wear Community School, Glasshouse Lane - Wednesday 15 Jan 3.30pm - 7pm
- Alphington Primary School, Wheatsheaf Way - Tuesday 21 Jan 3pm - 7pm
- Pinhoe Primary School, Harrington Lane, Pinhoe - Wednesday 22 Jan 3pm - 7pm

## **4. A summary of the main issues raised by those representations**

### **Have your say document**

- 4.1 Around 1000 individuals and organisations were consulted on the initial 'Have your say' document and about 350 responses were received. Approximately 300 were single-issue responses, whilst the remainder raised multiple issues. All policy areas were the subject of some comments. There was a tendency for individuals to make site-specific comments, for example objections to the proposed allocation of an employment area at Eastern Fields, Pinhoe (policy DD2), and the strategic allocation at South West Alphington (not actually in this DPD, but allocated through the Core Strategy). Land owners and consultants most commonly objected to designations (e.g. Monkerton Ridge Park, policy DD30), or that their site should be allocated for development, or that viability issues had not been properly considered.
- 4.2 The main issues raised by the representations, organised under chapter headings, are summarised below:

#### **Exeter's Local Vision for Sustainable Development**

- 4.3 The first chapter was largely supported by respondents to the consultation. However a few objectors felt that particular issues needed specific mention in the policy. For example the Highways Agency wanted the policy to explicitly require 'no adverse impact on the highway network'. Another respondent was concerned about what additional information was required to assess this policy.

#### **Realising Exeter's Economic Potential**

- 4.4 A number of general objections were received to the first two policies of this chapter, 'Employment land provision' and 'Retention of employment land or premises'. Concerns focused on the lack of any clear explanation of what was regarded as employment land, whether 18 months was too long a period over which to test viability, whether the correct land

was allocated at Newcourt, and what was perceived as the unnecessary complexity of the policy retaining employment land or premises.

- 4.5 The Council received about 230 site specific objections relating to the allocation of part of Eastern Fields, Pinhoe for employment development and associated infrastructure. This was the largest single issue objection received and was linked to the application to register Eastern Fields as a Village Green.
- 4.6 Objections were also received in relation to the other policies in this chapter. Some felt that the 'provision of local services in Employment Areas' policy was too restrictive, the 'Employment use in residential areas' policy should be more positively worded, and the 'Access to jobs' policy could not be enforced.

#### Delivering Homes and Communities

- 4.7 This chapter was the subject of the most objections from consultants, developers and agents. Most objections related to land or sites that had been omitted but that objectors considered should be allocated for residential development.
- 4.8 There were also objections from the public concerning sites proposed for housing development. The majority of objections related to land to the west of the M5, Topsham Road and to housing development to the south west of Alphington (which was actually allocated as a strategic allocation in the Core Strategy and was not referred to in the Development Delivery DPD).
- 4.9 A number of policy specific objections were received to the 'Proposals for housing on unallocated sites' and 'Housing development in residential gardens' policies. Objectors felt the policies were too restrictive, were contrary to the NPPF and did not allow suitable sites to come forward for development.

#### Retail and Tourism

- 4.10 A number of specific objections suggested that the 'Retail provision' policy did not reflect local circumstance or needs.

#### Sustainable Transport

- 4.11 The policies within this chapter were largely supported, although Devon County Council suggested that the policy to safeguard land for transport infrastructure required further detail and clarity to ensure infrastructure delivery. Some considered the 'Accessibility and Sustainable Movement' policy requirement for development to be phased so as to maximise the use of public transport was too exacting.

#### Meeting Community Needs

- 4.12 Generally this chapter was supported. However, there were some specific concerns that 'community facilities' should be treated in the same way as open space, allotments and sport and recreation sites and that the evidence base should be equally comprehensive. Some respondents had difficulty navigating this chapter.

#### Locally Distinctive Places

- 4.13 This chapter was largely supported, although one respondent considered the 'Design Principles' policy was unnecessary and unduly prescriptive and also considered the 'Heritage Assets' policy should be reworded to be more positive.

- 4.14 Devon County Council requested that a reference to the Green Infrastructure Strategy to be inserted into the 'Design principles' policy and English Heritage (now Historic England) requested that the 'Heritage Assets' policy be re-worded to more closely reflect the NPPF.

#### Environment

- 4.15 Whilst many supported the Environment chapter, particular policies were the subject of strong objections. A number of respondents were concerned that the 'Landscape Setting Areas' policy was too restrictive and others wanted the designation to exclude specific areas of land, largely to allow development.
- 4.16 The RSPB and Natural England made specific recommendations for amendments to the 'Biodiversity and Geodiversity' policy. Finally the 'Local Energy Networks' policy was subject to significant objection from consultants who generally considered the policy to be unduly onerous and not based on sufficient evidence.

#### Draft DPD

- 4.17 Again around 1000 individuals and organisations were consulted and about 450 responses were received. About 350 were single-issue responses, while the other 100 raised multiple issues.
- 4.18 All policy areas were the subject of some comment. There was again a tendency for individuals to make site-specific comments, for example the proposed housing allocation at Eastern Fields, Pinhoe, which attracted over 200 objections, and the land north of the West of England School Foundation, which attracted over 120 objections. Land owners and consultants most commonly objected to designations (e.g. Monkerton Ridge Park), or that their site should be allocated for development.
- 4.19 The main issues raised by the representations, organised under chapter headings, are summarised below:

#### Exeter's Local Vision for Sustainable Development

- 4.20 Again this first chapter largely attracted positive feedback. The amendments made at the previous stage were also positively received, although a few respondents continued to believe that particular issues needed specific mention in the policy (for example the Highways Agency in relation to the strategic Highways network and the South West HARP Planning Consortium in relation to affordable housing).

#### Realising Exeter's Economic Potential

- 4.21 A single, strongly voiced, objection was received from PCL Planning (acting on behalf of Growen Estates and the Consolidated Property Group) in relation to several policies in this chapter. Whilst a clear definition of 'employment land' was inserted at the previous stage, this consultant considered the definition too narrow and inconsistent with the NPPF and the Core Planning Principle that planning should 'proactively drive and support sustainable economic development'. The same consultant also objected strongly to the proposed allocation of employment land adjacent to Honiton Road and Fitzroy Road in the 'Employment land provision' policy (DD2).
- 4.22 Genesis Town Planning (acting on behalf of the Newberry Family Trust) objected to the omission of land at Oaklands Riding Stables, which is within the Alphington/Whitestone Valley Park, from the employment allocations.

- 4.23 The Green Party considered that employment land should not be allocated until the demand has been proved and existing land is in full use.
- 4.24 In relation to the 'Retention of employment land' policy (DD3), the change made at draft stage to reduce the viability test period from 18 to 12 months, was welcomed by some. However, again, PCL (acting on behalf of Growen Estates and the Consolidated Property Group) still considered a 12 month period to be an excessive period of time to market a vacant property. PCL also considered the 'Retention of employment land' policy to be unnecessary on the grounds that sufficient protection is afforded by policy CP2 of the Core Strategy.
- 4.25 The Council also received objections from PCL (acting on behalf of Growen Estates and the Consolidated Property Group) in relation to other policies in this chapter. They consider the 'Provision of local services in Employment Areas' policy to be too restrictive and should allow more concentrated provision of retail in suitable locations; and the 'Access to jobs' policy is unreasonable and onerous.

#### Delivering Homes and Communities

- 4.26 This chapter, and in particular the 'Allocated Housing Sites' policy, was the subject of the majority of comments received. The draft document included a number of new sites assessed as suitable to deliver residential development. The inclusion of these sites overcame some of the previous objections made by consultants, developers and agents, but also attracted a significant number of new objections from the public.
- 4.27 The site consisting of part of Eastern Fields (Pinhoe), which was previously allocated for employment development, attracted over 200 objections (a similar number of objections to those received in response to the employment allocation). Despite the failure of the village green application residents still feel strongly that this open land should be retained for community use.
- 4.28 The new site consisting of land north of the West of England School Foundation attracted about 130 objections. Local residents wish to see this green space (which is currently designated as part of Ludwell Valley Park) retained and are concerned that a safe access to the site cannot be achieved and that traffic and congestion problems will result. Objections were also received from Natural England (referring to the proposed allocation of the site as a County Wildlife Site and to its contribution to Green Infrastructure) and other conservation and amenity groups.
- 4.29 The following sites also attracted objections from the public: Land to the east of M5, Topsham Road; Land at Exeter Cricket Ground; Land west of Newport Park.
- 4.30 Consultants acting on behalf of developers and landowners drew attention to the omission of a number of sites from the 'Allocated Housing Sites' policy. One comment specifically criticised the approach taken to determining which sites should be allocated.
- 4.31 Most of the other policies in this chapter did not attract significant comment. Whilst the amendments made to the 'Housing on unallocated sites' policy at the previous stage led to fewer objections being received during this stage of consultation, one agent was particularly concerned that the policy made inappropriate reference to the SHLAA. Two respondents also considered that housing development in residential gardens needed a standalone policy and comments were received that the text relating to proposals in residential gardens was too prescriptive and did not mention innovative design solutions. Comments were also received in relation to the 'Housing for Disabled People' policy, with a number of agents considering the policy too onerous.

## Retail, Tourism and Culture

- 4.32 A number of respondents suggested that insufficient land is allocated for retail use and considered that the document fails to meet the scale and type of retail needed in town centres (as required by the NPPF). Respondents suggested that new sites should be allocated for retail to the south west of Exeter adjacent to the A377 (within the Alphington/Whitstone Valley Park) and on land adjacent to Honiton Road and Fitzroy Road (this land is the subject of a current appeal with appellants CPG Development Projects Ltd arguing that the current proposed employment allocation should be set aside in favour of a proposal for significant retail led development).
- 4.33 The revised and re-titled 'Protection and enhancement of tourist and cultural facilities' policy was positively received, although the Exeter Green Party considered there should be a presumption in favour of year-round tourist attractions to provide stability of employment and the Theatres Trust were concerned with the use of the word 'viable'.

## Sustainable Transport

- 4.34 The policies in this chapter were largely supported. However, Alphington Village Forum and the Exeter Green Party questioned the safeguarding of land for a park and ride site at Ide/Alphington interchange on the A30, on the basis of the impact on the Conservation Area, the lack of adequate examination of alternative sites and the lack of any positive benefits.
- 4.35 In regard to the 'Land safeguarded for the provision of transport infrastructure' policy and other policies in this chapter, Devon County Council made a number of suggestions for minor changes.

## Meeting Community Needs

- 4.36 Whilst there was significant general support for policies in this chapter, specific concerns were expressed regarding the wording of particular policies. Some were concerned that the wording of the 'Open Space, Allotments, and Sport and Recreation Provision' policy did not accord with the NPPF (in that the policy did not refer to developments for alternative sports and recreation provision) and did not encourage the provision of new facilities.
- 4.37 A number of respondents were concerned that the 'Assets of Community Value' policy was not clear and could be used to prevent development coming forward. Some wanted the policy deleted.

## Locally Distinctive Places

- 4.38 This chapter attracted few comments. Those that expressed a view were generally in support of these policies. However, one consultant considered the 'Design Principles' policy to be too draconian as it implied that all criteria needed to be complied with. The Civic Society requested a reference be made to contemporary design in this policy and the Exeter Green Party suggested changes to refer to sustainability and low-carbon measures.
- 4.39 One respondent requested a change to the 'Conserving and Managing Historic Assets' policy to ensure it is clear at what stage schemes for archaeological work needs to be agreed.

## Environment

- 4.40 This final chapter mainly attracted expressions of support from amenity groups and the public. The 'Protection of Landscape Setting Areas' policy was supported by RSPB, Devon Wildlife Trust, National England and a number of members of the public. However, several consultants and land owners argued that particular land should be excluded from the designation, generally on the basis that the land was being promoted as suitable for

development, although in one case because the landowner considered the boundary for the designation had been drawn incorrectly and in an arbitrary manner. In another case a group of land owners considered that the restrictive policies relating to the Valley Parks were unreasonably onerous and provided no support for landowners to manage the landscape.

- 4.41 Specific objections were received in relation to the designation of 'Monkerton Ridge Park', with one consultant in particular suggesting that the Council lacked a robust evidence base to support this designation and that there was doubt over the Park's deliverability.
- 4.42 The RSPB, Devon Wildlife Trust, Environment Agency and Natural England all made specific suggestions for text changes to the 'Biodiversity' policy. Other policies in this chapter attracted little comment, although their importance was recognised by Natural England, the Environment Agency and the Exeter and East Devon Low Carbon Task Force. One respondent commented that the 'Local Energy Network' policy should be properly tested for its effects on development viability and supported by an adequate evidence base.
- 4.43 Devon County Council made a number of suggestions for minor changes throughout this chapter.

## **5. How those main issues have been addressed**

### **Have your say**

- 5.1 Representations received as a result of the initial 'Have you say' consultation were carefully considered and changes made where appropriate. Below is a summary of how the main issues raised by the representations were addressed, organised under chapter headings:

#### **Exeter's Local Vision for Sustainable Development**

- 5.2 As this is a broad policy covering a number of aspects of sustainable development, it has been determined to keep the criteria general. However explanatory text has been inserted to clarify that, in most instances, the content of the application, together with the design and access statement, should provide sufficient information to assess whether the requirements are met.

#### **Realising Exeter's Economic Potential**

- 5.3 To respond to the concerns raised (summarised at 4.4) additional explanatory text was inserted to ensure it is clear what is regarded as employment land, the period to test viability was reduced to 12 months, the allocation at Newcourt was amended to more closely reflect the likely pattern of development delivery, and the policy text for retaining land and premise in employment use was simplified.
- 5.4 The application for Village Green status for the Eastern Fields, Pinhoe was refused. Nevertheless it was considered important to look at this allocation to see if any change could be made to address the objections received. It was concluded that this land could more appropriately be brought forward for housing development. Whilst it was clear that many of the objections would not be addressed by this change, it was hoped that residential development and associated provision of open space may be seen as a more attractive neighbour than employment land.
- 5.5 Whilst there were other representations on this chapter (summarised at 4.6), in the main it was considered that the approach taken to the other policies was reasonable and justified by the evidence. Specifically, it was considered that local services should continue to be restricted in employment areas and the criteria did not need amended; the wording of the 'Employment use

in residential areas' policy was amended slightly to delete the word 'only'; and the 'Access to jobs' policy was re-drafted to be encouraging rather than controlling.

#### Delivering Homes and Communities

- 5.6 To respond to the objections relating to land or sites that had been omitted, the consultation draft was updated to include the sites assessed by the Revised 2013 SHLAA as suitable to deliver development. The inclusion of new sites will overcome many of the objections made by consultants.
- 5.7 The draft document removed the allocated of land to the west of the M5, Topsham Road due to the levels of noise experienced across the site.
- 5.8 Following the consideration of policy specific objections it was determined to delete the 'Housing development in residential gardens' policy and to make significant revisions to the 'Proposals for housing on unallocated sites' policy.

#### Retail and Tourism

- 5.9 Following further consideration it was concluded that the 'Retail Provision' policy repeated Core Strategy contents. Therefore this policy was deleted. The other changes made to this chapter were not in response to representations received.

#### Sustainable Transport

- 5.10 In response to comments, the supporting text for the 'Land safeguarded for the provision of transport infrastructure' policy was amended to include more detail on infrastructure requirements and to emphasise the importance of ensuring delivery. However, despite objections to the phasing of development this element of the 'Accessibility and sustainable movement' policy was considered important and was retained.

#### Meeting Community Needs

- 5.11 In response to representations received, a commitment was made to undertake a Community Facilities Audit to support this policy. The layout of this chapter was amended and one of the policies re-titled. This should help with the navigation of this chapter.

#### Locally Distinctive Places

- 5.12 In response to comments received, reference was made to the Green infrastructure Strategy and the Assets policy was re-worded to more closely reflect the NPPF.
- 5.13 In order to address the Core Strategy objectives, two new policies were inserted into this chapter: 'Designing out Crime' and 'Shop Fronts'.

#### Environment

- 5.14 The 'Landscape Setting Areas' policy, which prevents significant development in areas of land that are important to the city's setting, is considered vital to the long term spatial strategy. Accordingly this policy was not amended. Furthermore, whilst each request for a change in the area covered by this designation was carefully considered, in the main it was decided to retain the boundaries proposed in the initial consultation.
- 5.15 In response to suggestions made by RSPB and Natural England, changes were made to result in a clearer, stronger policy.

- 5.16 In regard to Local Energy Networks, additional evidence was compiled since the initial consultation to ensure the policy is justified and viable.

## **Draft Document**

- 5.17 Representations received as a result of the consultation on the Draft Development Delivery DPD were carefully considered and changes suggested where appropriate. Below is a summary of how the main issues raised by the representations were addressed, organised under chapter headings.

### **Exeter's Local Vision for Sustainable Development**

- 5.18 Whilst a couple of respondents wanted specific mention to be given to the strategic road network and affordable housing, it has been decided to keep the criteria worded in a general manner.

### **Realising Exeter's Economic Potential**

- 5.19 In response to the representation received from PCL Planning (acting on behalf of Growen Estates and the Consolidated Property Group) and to ensure the definition of employment land is entirely clear it is proposed to insert additional explanatory text and to repeat the Core Strategy definition of 'employment land' in the glossary.
- 5.20 Whilst the boundary of the Exeter Business Park allocation, objected to by PCL Planning (acting on behalf of Growen Estates and the Consolidated Property Group) has been amended to reflect the area that remains available for development, it is still considered that this allocation is appropriate to meet the demand for employment land.
- 5.21 The land at Oaklands Riding Stables is outside the Core Strategy's strategic locations for growth and therefore is not proposed for development. Whilst the Exeter Green Party consider employment land should not be allocated until existing land is in full use, the NPPF requires plans to identify strategic sites to meet anticipated needs over the plan period.
- 5.22 No further changes are proposed to the 'Retention of employment land' or the 'Access to jobs' policy in response to the concerns raised by PCL (acting on behalf of Growen Estates and the Consolidated Property Group). However, the supporting text for the 'Provision of local services in employment areas' policy has been amended to increase the floorspace limit to 280sqm. This figure corresponds to the Competition Commission's definition of a small convenience store.

### **Delivering Homes and Communities**

- 5.23 Despite the high level of objections received in response to the proposed allocation of part of Eastern Fields for housing development, the 2015 SHLAA concludes that this site is suitable for development and can contribute to delivering the strategic housing requirement. Accordingly it is proposed to retain this site in the publication version of the document.
- 5.24 In relation to the land north of the West of England School Foundation, this site was proposed for allocation in the draft document because the Revised 2013 SHLAA concluded the site was suitable for development. This conclusion was drawn at a time when Exeter's five year housing land supply was marginal and it appeared that the Core Strategy's target to deliver at least 12,000 dwellings over the plan period would otherwise not be achieved. This is no longer considered to be the case. The 2015 SHLAA concludes the land north of the West of England School Foundation site is not suitable for development as it is outside the strategic locations for growth identified in the Core Strategy and therefore this land is no longer proposed for allocation in the publication version of the document.

- 5.25 A number of sites (including land to the east of M5, Topsham Road, land at Exeter Cricket Club and land west of Newport Park) now benefit from planning permission and therefore do not need to be considered by this document.
- 5.26 All sites that the SHLAA considers are developable for housing are included in the document. It is considered that the SHLAA is a robust and transparent way in which to make this assessment and is in accordance with National Planning Practice Guidance. The publication version of the Development Delivery DPD has been updated to include sites assessed by the 2015 SHLAA as able to deliver development. The inclusion of new sites will overcome some of the objections regarding the omission of sites/or lack of sites identified made by consultants, developers and land owners.
- 5.27 In response to representations received, the 'Housing on unallocated sites' policy text is amended to delete direct reference to the SHLAA, although the supporting text still refers to it. Whilst it is still considered that there is no need for a separate policy on housing development in residential gardens, additional text has been added to respond to comments concerning the prescriptive nature of the supporting text and lack of mention of innovative design solutions.
- 5.28 The 'Housing for Disabled People' policy has been renamed the 'Accessible, adoptable and wheelchair user dwellings' policy and amended to relate to the new national standards (introduced in March 2015).

#### Retail, Tourism and Culture

- 5.29 Work undertaken in support of the Core Strategy suggests that our existing city centre focused retail strategy is appropriate. Therefore no changes are proposed to retail allocations.
- 5.30 In response to the Exeter Green Party, whilst it is not considered reasonable to insert a presumption in favour of year round tourist attractions, the policy text already allows for proposals to be assessed on their merits. To address the Theatre Trust concerns, additional text has been added to explain more fully what evidence needs to be provided to demonstrate that a use is not viable.

#### Sustainable Transport

- 5.31 The principle of a park and ride at the A30 junction is established in the adopted Core Strategy and Devon County Council has undertaken significant work to establish the rationale for the park and ride and its location. Accordingly, whilst work is ongoing to establish the best location (which may be outside the city's boundary), it is not proposed to make any changes to the document.
- 5.32 In regard to suggestions by Devon County Council for minor changes, these have been made where considered helpful.

#### Meeting Community Needs

- 5.33 In response to comments relating to the 'Open space, allotments, and sport and recreation provision' policy it is proposed to amend the text to ensure it closely reflects the NPPF and supports the provision of new facilities. The text of the 'Assets of community value' policy and the supporting text have been amended to ensure the policy is clear. However, it is considered reasonable to give recognition to assets of community value in the planning system and therefore the policy is retained.

## Locally Distinctive Places

- 5.34 In response to concern that the 'Design principles' policy was too draconian, the policy text is changed to make it clear that all the criteria will not be relevant to every proposal. A reference to 'contemporary design' is also inserted into this policy to address comments received. However, reference is not made to sustainability and low-carbon measures in this policy, as these issues are already covered by policy CP15 of the Core Strategy.
- 5.35 To address concerns raised, one minor change is made to the 'Conserving and managing historic assets' policy to state that schemes of archaeological work need to be agreed in advance of development commencing on site (rather than in advance of planning permission being granted).

## Environment

- 5.36 It is considered that the approach taken to landscape setting areas is reasonable and in accordance with the NPPF, that the proposed boundaries are justified and that the provision of the new Monkerton Ridge Park is supported by evidence and the concept can be delivered. Accordingly no changes are made in response to the representations made.
- 5.37 In response to comments received in relation to the 'Biodiversity' policy, several changes have been made to ensure clarity and consistency with the NPPF. A Viability Study has been completed that assesses the viability of policies in the Development Delivery DPD.
- 5.38 A number of changes have been made in response to suggestions from Devon County Council, including an amendment to the 'Protection of landscape setting areas' policy to allow for development that delivers strategically important infrastructure where it can be demonstrated that there is no suitable alternative site with less harmful impacts.

## 6. Contact Details

- 6.1 The above provides a summary of the main issues raised by the representations received and how these were responded to. However, it is not intended to be a comprehensive list of all representations received or changes made. If you are interested in the details of a particular representation or the response to it (including any changes to policy and supporting text) please contact City Development using the contact details provided below:

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