



The Planning
Inspectorate

Report to Exeter City Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION OF EXETER CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 28 February 2011

Examination hearings held on 21, 22 and 23 June, and 24 August 2011

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queried the extent of support in the earlier viability study for the full 35% affordable housing on all 3+ dwelling sites. The Council conceded that, if CIL were introduced in the future, providing affordable housing on some smaller sites could be unviable. However, it argued that the provision of affordable housing should be shared across the housebuilding industry. No other threshold has better evidential support which would enable it to be substituted in the policy. I therefore support the threshold of 3 dwellings as an appropriate starting-point for planning and negotiation.

32. A role for commuted sums on schemes of fewer than 5 dwellings was suggested, and change to the supporting text was put forward to permit this **(PC15)**. This should help to make the policy more flexible and able to deliver the much-needed housing, without compromising the aim of PPS3 for mixed communities.
33. On the requirement that at least 70% should be social rented housing, there is also concern about scheme viability, especially as this sector has been most grant-dependent. The Council pointed out that social rented accommodation is where the greatest level of need arises and, without substantial new provision, many people will not be suitably housed. In the absence of evidential support for another figure, Policy CP7 should retain the reference to 70% social rented housing. The Council proposed a change to paragraph 6.32 to emphasise that viability would be considered in applying the policy, and a flexible approach taken. The Government's recent change to the definition of affordable housing in PPS3, Annex B, to add "affordable rented" will widen the range of housing types. The proposed change to p.6.32 also reflects the definitional change, and contributes to soundness **(PC16)**.

Gypsies and Travellers

34. The Devon-wide Gypsy and Traveller Housing Need Assessment [CD27] carried out in 2006 informed the RS 2008 [CD98], and the figures for residential and transit pitch requirements 2006-11 are given in Exeter's plan (p6.29). Criticism was made that the estimate for additional residential pitches by 2026 stemmed from a projection of national rather than local growth in gypsy households. However, as the City Council has been unable to provide any new sites between 2006 and 2011, the longer term figures in Policy CP6 may be considered conservative. Insufficient evidence has been provided to demonstrate that the figure of 25 residential pitches is too high or that better figures are available.
35. The Government has recently issued a consultation document: Planning for Traveller Sites.⁴ This aims to give local authorities more discretion over need assessment, and ensure that collaborative working leads to fair and effective strategies. Proposed changes to national policy are at an early stage and the Council's approach does not conflict with the new document. Exeter City

⁴ This would remove the existing Circulars: Planning for Gypsy and Traveller Caravan Sites, and for Travelling Showpeople (C01/2006 & 04/2007),

participated in the countywide assessment [CD27] and accepted its findings.

36. The Council states that it has been searching for suitable gypsy and traveller sites over recent years without any success, although this has not been the subject of a publicly available report. In 2008, a call for sites from Government bodies, adjoining local authorities, local organisations, agents and members of the public yielded none. Whilst the proposals for sites to be found at Newcourt and Monkerton/Hill Barton have clearly proved unpopular with developers and local people, the Council pointed out that the Government's Good Practice Guide to Designing Gypsy and Travellers' Sites supports the inclusion of traveller sites in significant new build developments.
37. Paragraph 6.29 of the plan states that suitable sites will be identified through the strategic allocations and the Site Allocations DPD. This implies some conflict with Policy CP19 which seeks provision of 26 pitches in the strategic allocations. I shall recommend a change to Policy CP19 which would remove reference to the numbers of pitches (see paragraph 49 below) and this should give the Site Allocations DPD a stronger role in looking in greater detail at local need and identifying suitable sites over a wider area. I consider that more collaborative working and engagement of the stakeholders, including the local gypsy and traveller community, is needed to ensure that an appropriate level of provision is achieved on the best sites.
38. Concerning the criteria in Policy CP6, regard must be had for Annex C, Circular 01/2006, which reminds the reader that gypsies and travellers have the same rights and responsibilities as every other citizen. Plan policies and criteria should be fair, reasonable, realistic and effective, and written in a positive manner. I consider that the criteria in CP6 are satisfactory and sound. Overall, I conclude that, subject to the above-mentioned changes, the plan should make the best possible contribution to meeting the local needs for affordable housing and gypsy and traveller accommodation.

Issue 4 – Whether the Core Strategy sets out a clear economic vision and strategy for Exeter which positively and proactively encourages sustainable growth. Whether it plans properly for the growth and management of Exeter City Centre and other centres.

39. The success to date of the local economy in Exeter is described in summary in paragraphs 2.7-2.12 of the plan. Historic joint working with Devon County Council, neighbouring District authorities and the Growth Point Board is continuing to deliver the Science Park, new settlement at Cranbrook in East Devon and the urban extensions, among other things. The plan's Vision aligns well with PPS4: Planning for Sustainable Economic Growth. Objective 2 of the plan appropriately seeks to develop the potential of the City for further economic and commercial investment. The Council expressed its broad support for the aim to say 'yes' to development and growth, except where this would compromise the key sustainable development principles set out in

are either under construction or have planning permission at Exeter Airport and Skypark within the study area.

45. The plan recognises the importance of the University to the local and sub-regional economy, at paragraph 6.28. In late 2010, the University of Exeter (Streatham Campus) Masterplan Framework was adopted as a supplementary planning document (SPD) [CD100g]. The University is expected to play a key role in establishing and developing the Science Park in East Devon. The plan includes sufficient references and is sound in its coverage of tourism and the University. Overall, the plan sets out a clear economic vision and strategy which positively and proactively encourages sustainable growth. It plans properly for the growth and management of Exeter's centres.

Issue 5 - Whether the identified strategic allocations are justified, and would be capable of being delivered.

46. The strategic allocations at Monkerton/Hill Barton, Newcourt and Alphington are planned urban extensions requiring a long lead-in time. Their development is central to the achievement of the Core Strategy. Plans 1 to 3 of the plan on Ordnance Survey bases show their boundaries, and the allocations fit the description of strategic sites in PPS12. The urban extensions, being in conformity with the draft RS and supported by evidential studies, are justified. Masterplans for Monkerton/Hill Barton and Newcourt were the subject of public consultation in early 2010 and screening for sustainability appraisal (SA) was carried out. Though SA for the masterplans was not considered necessary, the Core Strategy has been subject to SA.
47. Policy CP19 and paragraphs 12.13 and 12.18 expect development to be in accordance with the masterplans. However, section 5.6 of the Monkerton & Hill Barton Masterplan Study [CD61] illustrates the plan but advises that the fundamental principles for implementation may give other valid outcomes. I agree that the masterplans can only be indicative of final development. The Council has put forward changes to the Core Strategy which explain that the masterplans are to be applied flexibly (**PC30,31,33**).
48. Policy CP19 provides details of the mix of uses proposed at each of the strategic allocations. At Monkerton/Hill Barton, it was queried whether a local or district centre should be sought. It was also argued that new community facilities along the Honiton Road frontage would be needed to serve 'Monkerton south'. The masterplan study reviewed options for a new centre (or centres) and I have insufficient evidence that Policy CP19 is inconsistent with PPS4 or out of line with Exeter's hierarchy of centres. Flexible application of the plan and masterplan should allow for appropriate provision of shopping and community facilities as the urban extension develops. Having regard for the Residential Design Guide SPD [CD100d], I am satisfied that family housing could be achieved on the strategic allocations at the densities proposed.
49. The provision of gypsy and traveller sites at Newcourt and Monkerton/Hill Barton is strongly opposed by some parties on the grounds that the proposals are not adequately justified, and have created uncertainty amongst prospective developers at Newcourt. It is claimed that the promotion of gypsy and traveller sites could prejudice delivery of the overall development. Large gypsy sites, it is argued, could have a harmful impact on neighbouring settled

communities. These issues need to be investigated further and dealt with collaboratively. The plan would enable such a process and be more flexible if Policy CP19 omitted the precise numbers of pitches. The need for suitable traveller sites is urgent, as none have been added in Exeter in the last five years, and total dependence on the Strategic Allocations could delay their provision. Potential conflict between the numbers in Policies CP6 and CP19 would be removed by the recommended change **(IC3)**.

50. Concern that Policy CP19 focuses too much on the amount of employment land required and fails to embrace the importance of encouraging a range of uses that would generate jobs is addressed by the Council proposed change to Policy CP2 **(PC11)**. I see no need for further amendment.

Infrastructure

51. Following a public inquiry related to a planning application for land off Hill Barton Road in 2011 (APP/Y1110/A/10/2137880), the Inspector observed that "The Council accepted .. that aspects of the masterplan remain unresolved; in particular, the identification of the necessary infrastructure, and the means of its provision and funding." The Council's Infrastructure Delivery Plan February 2011 [CD65] goes some way to meeting the requirements for good infrastructure planning in PPS12 (paragraphs 4.8-12). The Council has worked with Devon County Council and other service providers to identify items of infrastructure which are desirable, necessary or critical to deliver the plan. Needs and costs, phasing, funding sources and bodies responsible for delivery are identified. Each of the strategic allocations, and other areas, is covered.
52. After publication of the plan, the Council changed paragraph 11.11 [CD84] taking out a table of infrastructure projects and substituting a reference to its Infrastructure Delivery Plan [CD65]. In view of the evolving pattern of public funding availability, this was reasonable at the time. The Council presented a revised Infrastructure Delivery Plan in August 2011 [CD65A] to the re-convened hearing session. This updated the earlier document and indicates the mechanisms whereby developer contributions will be sought as either community infrastructure levy (CIL) or section 106 planning obligation. An amended key infrastructure table would reflect this additional work, and give a more effective plan and I support its inclusion, with the additional change regarding School Provision proposed by the County Council **(PC25 & App1)**.
53. The Council is currently preparing a CIL charging schedule, which would need to be examined prior to adoption. The preliminary work indicates the costs associated with different phases of the strategic allocations for residential development [EXCC027&028]. The revised Infrastructure Delivery Plan anticipates CIL's introduction and is designed to provide more certainty to landowners and developers as to what will be expected. It should provide a useful starting point for negotiations and I support the Council's changes to refer to it. I conclude that, subject to the proposed changes **(PC23-29)**, the identified strategic allocations are justified, and should be deliverable.