



Exeter Local Plan - Consultation Sep'21

Thank you for the opportunity to help shape the [Exeter Local Plan](#). The Exeter Cycling Campaign offers the following comments.

General Comments

Our general comment about this document is that it lacks the necessary urgency, drive and clear-sighted vision for how Exeter will shape developments in a way that reflects the gravity and seriousness of climate change. This should be the 'Climate-Crisis Emergency Local Plan'. This urgency doesn't come through in the draft document.

The strength of the now-defunct Greater Exeter Strategic Plan is that it attempted to recognise the interdependency of the different district councils and Devon County Council. This interdependency hasn't disappeared because the GESP has come to nothing. The Exeter Local Plan should acknowledge this interdependency and commit to continuing to work with these other councils to make a success of planning and transport links across the region. The Exeter Local Plan should not have a myopic focus within the city boundary alone.

Question 1: Do you have any comments on the content of the new Local Plan and its relationship with other plans?

Other plans that need referencing in the Local Plan are:

- [Devon Climate Emergency Plan \(draft\) plan](#)
- [Exeter City Council's Net Zero Plan](#)
- Devon County Council's emerging Local Cycling and Walking Investment Plan (LCWIP) and their [Exeter Transport Strategy](#)
- National design standards for cycle infrastructure ([LTN 1/20](#))
- Given the proximity of developments in East Devon with the eastern boundary of Exeter, the East Devon Local Plan (in development) (and Teignbridge Local Plan) should be referenced

We would comment that the proposed contents of the local plan don't appear to give the necessary prominence to the need to decarbonise housing and transport.

Question 2 Are these the main issues facing Exeter? Are there any issues which we should change, add or remove?.

We offer the following comments on the 'Issues' section of the consultation:

1. Future of high streets: We propose setting up [15 minute neighbourhoods](#). We need to move away from the recent implementation of out-of-city housing developments which have no local amenities. These are building car-dependency to reach shops and other local amenities. Most recent new developments in and around Exeter have only housing and no community buildings, shops, local services etc.
2. "High quality places and design": The Local Plan needs to mandate design standards for cycle infrastructure ([LTN 1/20](#)). The Local Plan should also set expectations of and standards for tree planting and rainwater soakaways. These will both mitigate climate-warming increased heat



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and rain as well as creating better places to live and move through. Tree planting should not be focused solely on parks.

3. "Sustainable transport and communication": This section could be stronger. As currently written it gives little indication that transport needs to be totally transformed: driving disincentivised, walking and cycling prioritised and road design dramatically changed to reflect the transport hierarchy.

Furthermore, we need to challenge the current practice in planning applications that focus only on the 'red lined' area of the application without thought to permeability across and into / out of the site for people walking and cycling. The local plan therefore needs to mandate permeability across new development, to mandate national design standards, to ensure cycle and walking routes are safe enough for children to travel independently and to disincentivise car use by making it less attractive.

We note that Developers' Applications often give little proper attention to a Masterplan for an area. The Local Plan (and the planning process) needs to ensure Developers' Applications more closely adhere to the relevant Masterplan.

The Devon Climate Emergency Response Group Carbon Plan talks about reducing the need to travel by introducing good digital connectivity, reducing vehicle capacity and relocalising. The draft Local Plan appears to be deaf to these calls. This paragraph in the Local Plan therefore needs to enable (mandate?) these changes and outline the wholesale transformation to how we travel in the city / county.

Question 3: Do you have any comments to make on this vision for the new Local Plan?

4. We believe that moving to a net-zero-carbon city needs to be front and centre of the Vision. The opening statement that *"Exeter has a vision for growth as a connected city region consisting of thriving linked communities set within an exceptional environmental setting."* suggests business-as-usual. The city's commitment to net zero will (must) shape how we grow as a city and what we prioritise: this needs to be made clear in the Vision so that it then becomes the key driver in Planning Applications. To simply begin the Vision as being 'to grow' implies that this will trump any (implied) lesser goals of reaching net zero. Later sentences in the Vision statement mention 'addressing...climate change' but the priority implied here needs correcting.
5. Exeter's own development is not done in isolation. We have seen in recent years developments on the edge of Exeter from our neighbouring district councils. We recognise that the Greater Exeter Strategic Plan has not come about but the Exeter Local Plan needs to recognise and take into account the impact of these neighbouring district councils' developments on the city. The Exeter Local Plan therefore needs to ensure low/no-carbon transport links to the districts outside of Exeter. The Exeter Local Plan also needs to reference and tied into the local plans of neighbouring district councils.

The pattern and quality of future development in Exeter

Question 4: Do you have any comments on the ideas which could shape the future pattern of development in Exeter?



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6. This section states a key strand is to 'Focus on the city centre'. We fear that this approach runs counter to some of the other aspirations to reduce car use / carbon pollution.

Such a focus on the city centre will continue to build in car dependency into remote edge-of-city communities. The focus should instead be to ensure every household can access local amenities within a 15 minute walk or cycle with the city centre the focus for larger amenities (bigger shops, cinemas etc), supported by excellent public transport. This would mean that planning policy mandates the provision of shops, community centres, work hubs etc in edge of city developments.

The Local Plan needs to take into account the developments of neighbouring districts on the edge of Exeter.

7. There is no mention of mobility hubs in the Vision as a means of reducing car use - and yet this is a clear recommendation from both the Devon Climate Emergency Response Group (DCERG) draft Carbon Plan and the Net Zero Exeter 2030 Plan..

The DCERG Carbon Plan talks about 'relocalising' services and production as a means of reducing the need to travel. The Exeter Local Plan needs to embrace this as part of the Vision.

8. We would have liked to have seen explicit reference to liveable neighbourhoods / Low Traffic Neighbourhoods in the Local Plan. Areas designed to inhibit rat-running and enable safe movement for children / the elderly walking, scooting and cycling should be an explicit aspiration of the Local Plan.
9. The draft Local Plan says it will "manage development pressures...". This really doesn't sound strong enough. The Local Plan needs to commit to *improving* the natural environment so that our current ecological crisis can be reversed.
10. We're surprised that the Local Plan appears to make little mention of how new (and existing) housing areas needs to be transformed in the way they are heated and insulated. The Local Plan needs to proactively shape how houses are heated and insulated, perhaps with commitments to community heating schemes, room for solar power areas and space for wind power generation.
11. We would expect the Local Plan to give explicit protection for the sight lines that give Exeter its sense of space, not only nestled on the edge of Dartmoor but also as a smaller, friendly city. The key areas that provide this sense of space are often hilly and not always good places for sustainable development but an identification of this visual 'green fringe' shouldn't inhibit the expansion of the city but instead guide it around these significant areas. Examples include the sight line down Fore Street / Western Way to the green hills above St Thomas, or from Stoke Hill over the city to the hills beyond. Equally these sight lines could be used to celebrate architecturally important views - such as the view of the cathedral as you enter the city on Dunsford Road, or the view of historical university buildings from the E1 near the river. The significant challenge with this is that it is often defined by areas beyond the control of Exeter City Council.

Question 5: Do you have any comments on the ideas which could shape the future quality of development in Exeter

We offer the following ideas which should shape development in Exeter:



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12. We need car-free areas, and this should explicitly form part of the Local Plan. We need more than just areas which maximise walking and cycling: the way to maximise walking and cycling is to disincentivize driving.

13. Low traffic and car-free neighbourhoods need to be a key part of reducing the city's carbon pollution and building better places to live. The DCERG draft Carbon Plan talks about the 'successful failure' if we merely replace fossil fueled cars with electric cars. The Local Plan needs to ensure neighbourhoods aren't clogged by electric cars. Furthermore, electric charging infrastructure must not be implemented by stealing space from people walking on pavements..

14. Climate mitigation measures are necessary and should form part of the Local Plan - e.g. more trees on urban roads (not just in parks) and as an integral part of any new development, mandated through planning policy. Build water soakaway / flood management measures into all new housing developments and all new road / cycle paths.

15. The Local Plan should ensure roads / cycle paths into and through new housing developments are adopted by DCC *before* the houses are occupied. This will ensure good travel (and parking) habits are adopted from the start of a new development. Current practice is for DCC to delay this formal adoption of roads in new housing developments. This allows poor travel and parking habits to develop early on, which are then difficult to change.

16. The oft-quoted ambition to have 50% of journeys done by foot or bike is not ambitious enough in our climate emergency. Our understanding is that DCC's target of 50% of journeys by foot/bike actually only applies to *intra-Exeter* commuter journeys. It is unclear if this is the same for Exeter's proposed target. *INtra-Exeter* commuter journeys are only half of Exeter's commuting traffic. Back in 2011 39% of *intra-Exeter* commuting journeys were already done by foot/bike. To raise this to 50% by 2030 doesn't actually seem to be a stretch target.

The active travel target for Exeter should include **all** journeys (internal and commuting into/out of the city and also commuter and non-commuter journeys). The Local Plan should ensure that new housing developments assume that the majority of journeys are done by foot/bike and bus, with car journeys the minority and are designed/built accordingly. The space allocation and design of housing developments should reflect this.

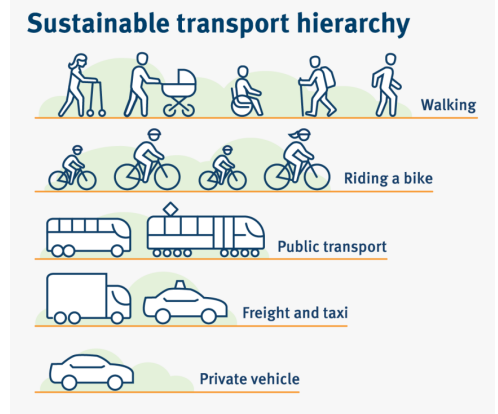
17. The Local Plan appears to make little reference to redesigning existing space in Exeter. We would like to see a commitment to redesigning existing buildings/infrastructure: to retrofit improvements and changes rather than only focus on new developments (e.g. more trees and permeable surfaces, continued improved cycling provision etc).

Question 6: Are there any further comments you would like to make on the new Exeter Local Plan?

18. Mandate through planning policy that all new houses have adequate and convenient cycle storage in each new residence. Currently car parking is prioritised, with bike parking often tucked away into a rear-garden shed. This priority needs to be reversed.

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19. Developers need to demonstrate how their Applications support the transport hierarchy.
20. DCC's soon-to-be-created Local Cycling and Walking Infrastructure Plan (LCWIP) for Exeter needs to be adopted as a Supplementary Planning Document.



21. Mandate a requirement for residential applications over a certain size to not only provide space for bike storage but dry, safe, illuminated space for bike maintenance. This is most noticeable in multi-unit buildings as they often lack a garage space to fulfil this need.
22. Mandate that commercial developments have minimum support facilities to support those travelling by active transport - not just bike storage but lockers, showers, maintenance spaces etc. These would need to be appropriate to the expected occupancy of the building - e.g. 1 shower / 50 staff, rounded up with a minimum of 25 staff (mini offices don't need one), maintenance facilities if > 200 staff members, 2x number of lockers to staff based bike rack requirements (bikes are not the only form of active travel).
23. It is our assumption that existing SPDs and other policy planning documents (for example the minimum number of cycle parking spaces needed) will remain in place.
24. Commit to including cycling provision standards as part of HMO licences as these typically have a higher level of active transport usage than single occupancy dwellings. Consider a landlords charter or similar to promote similar standards to smaller units (or ideally a landlords registry to enforce it although this would require significantly more effort). It is unacceptable that landlords can provide accommodation with no cycle storage available.
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