

Planning Statement

Residential Development Land to the North of Exeter, Stoke Hill,
Exeter

Prepared on Behalf of Mr J Drake and Family

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McMurdo Land Planning and Development Ltd
a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL
e carly@mcmurdolpd.com
t 01392 422297
m 07547211458

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1. Executive Summary

- 1.1 McMurdo Land Planning and Development Ltd (“McMurdo”) submits this Outline Planning Application for a pioneering new development of up to 85 dwellings (35% affordable), community hub, access, and associated infrastructure (all matters reserved bar access) on land to the north of Exeter, Stoke Hill, on behalf of Mr J Drake and Family (“client” and “applicant”).
- 1.2 The site, located adjacent to the northern edge of the City of Exeter, is a strategic site, close to amenities and accessible for existing key infrastructure and services. This forward thinking proposal represents the epitome of sustainable development, promoting a unique culture change towards green technologies and infrastructure, eco-friendly modes of transport and a focus on community living.
- 1.3 In June 2019, the Government set a commitment in the Climate Change Act 2008 for the United Kingdom (UK) to reach “net zero” greenhouse gas emissions by 2050. Councils across the country are now being asked how they can accelerate meeting Government targets in their own areas. The focus on how regions can plan for reducing carbon emissions from our homes and communities, is unprecedented.
- 1.4 At the local level this means that Councils are looking at how they can secure carbon reductions through their plan making and decision taking. Inevitably, a key focus will be on the residential sector, which is the source of 15% of the UK’s emissions. The challenge is reconciling how to meet climate change targets, whilst also delivering the new homes and buildings that will meet local needs.
- 1.5 This distinctive scheme proposes to respond to the housing and climate crises, through both design and technical measures, which will encourage a culture shift in the way we live and help the move towards a more sustainable future.
- 1.6 The development proposes to deliver a new urban village community, focussing on core principles of social, financial, and environmental responsibility. The vision looks to disrupt conventional housing delivery through innovative and sustainable building and development, that recognises the importance in the preservation of our planet and generating wealth for all (Carbon Zero).
- 1.7 The site lies within an area identified, through work and evidence prepared on behalf of the Greater Exeter Strategic Plan (GESP), to be an area suitable for strategic housing growth and development.

Despite GESP's demise, the detailed evidence behind it clearly demonstrates the suitability of this area for strategic housing development, reinforced by the following applications being allowed on appeal:

- 21/0020/OUT (Outline planning application for a residential development of up to 100 dwellings and associated infrastructure (all matters reserved except access) on land off Pendragon Road; and,
- 20/0538/OUT (Outline planning application for up to 93 dwellings on land at Spruce Close and Celia Crescent, Exeter (which went to Committee with an Officers' recommendation for approval).

- 1.8 It is well known that for some time now that Exeter City Council cannot demonstrate a five year housing land supply (5YHLS). This is demonstrated in recent appeal decisions 3202635 (Land west of Clyst Road), 3298452 (Land off Pendragon Road), 3292721 (Land off Spruce Close). It follows that to ensure the delivery of housing in the City, applications for housing should be approved without delay.
- 1.9 Recent appeal decisions show that substantial weight can be placed on applications for the provision of housing within the context of Exeter's poor record at providing homes (the 5-year housing land supply issue in Exeter has been critical for some considerable time).
- 1.10 The New Draft Exeter Local Plan aims to meet the housing needs of Exeter on brownfield land, a substantial proportion of which is existing high value employment land. The Council accepts in a report to the Executive on the 27th June 2023 that this approach has various challenges associated with it due to the 'significant viability and infrastructure needs' of previously developed sites. Further it acknowledges in this same report that additional time and expertise are required to support this approach at Examination including evidence of viability. The viability of the Regulation 18 Draft Exeter Plan (and its proposed allocations) has not been tested. As such, this Draft Plan does not demonstrate that a viable plan led approach exists or will soon exist to secure the housing numbers required in Exeter.
- 1.11 Bearing in mind the outstanding sustainability credentials of the site on the urban fringe of Exeter (as detailed in the suite of reports submitted with the application), and the critical housing land supply position, the proposal should be considered as exceptional in the context of Paragraph 12 of the NPPF. If the Council does not want to consider it as such, it can and should approve the application because it complies with Paragraph 11 of the NPPF and the presumption in favour of sustainable development.

- 1.12 In a nutshell, this planning application addresses a long demonstrated and widely acknowledged¹ shortfall in housing supply in a City where the development plan is out of date and has been for some time and where the house price to earnings ratio is now one of the worst in the country. It would not have adverse impacts that would “*significantly* and *demonstrably*” outweigh its benefits. Inevitably, therefore, it is a proposal for sustainable development which should be approved without delay.

¹ ECC Multiple Appeal “Statement[s] of Common Ground” show that the Council has known about a housing land supply shortfall for around 10 years.

2 Introduction

2.1 McMurdo Land Planning and Development Ltd (“McMurdo”) submits this Outline Planning Application for a pioneering new development of up to 85 dwellings (35% affordable), community hub, access, and associated infrastructure (all matters reserved bar access) on Land North of Exeter, Stoke Hill, on behalf of Mr J Drake and Family (“client” and “applicant”).

2.2 The development proposed is a forward-thinking scheme (an urban village community) the epitome of sustainable development, being located adjacent to the edge of the City of Exeter and entirely in line with the City Council’s vision.

“Exeter combines the strengths of a global city with a local perspective; the neighbourhoods and communities that make up the city retain the qualities of the villages that once surrounded it. Its valley parks bring green space into the heart of the city and allow people to move around in a natural and green setting. It’s heritage and environment make it a liveable and active city” (Liveable Exeter, p7).

2.3 This unique scheme aims to promote and enhance community spirit and important valley park characteristics, placing emphasis on green spaces, village style community areas, green technologies and infrastructure, and eco-friendly modes of transport. The site is close to amenities and accessible for existing key infrastructure and services. Furthermore, it comprises an area which was identified for strategic development within the Greater Exeter Strategic Plan (GESP) which promotes support and investment into development, creating jobs, promoting sub regional economic activity and wealth and prosperity for all.

2.4 This development is focussed on enabling the delivery of:

- A zero carbon, strong, connected, urban village community;
- Culture, health, well-being and happiness;
- Sustainable transport;
- A rich natural environment and biodiversity net gains, linking into existing green infrastructure within the City.

2.5 Simplified, the holistic justification for development, is:

- Securing carbon reduction through plan making and decision taking is coming to the fore. Inevitably, a key focus will be on the residential sector and reconciling how to meet climate change targets, whilst also delivering the new homes and buildings that will meet local needs.
- Exeter City and the adjoining “West End” of East Devon are the economic drivers for the sub-region and their growth cannot be constrained for social and economic reasons.
- Exeter has no land left and it must be allowed to grow sustainably. The Regulation 18 Draft Exeter Plan for consultation includes proposals to develop housing on high value employment land which is undeliverable (certainly undeliverable in the short term without significant public sector intervention) and which would negatively affect the sub regional economy in any event. (Why would it be right to build housing on high demand (and high value) employment land?). The viability of the Regulation 18 Draft Exeter Plan (and its proposed allocations) has not been tested. As such, this Draft Plan does not demonstrate that a viable plan led approach exists or will soon exist to secure the housing numbers required in Exeter.
- Land to the north of Exeter is located adjacent to the City’s edge, linking in with greenspace and sustainable modes of transport.
- Whilst the Greater Exeter Strategic Plan (GESP) is no more, the detailed work behind the evidence base clearly demonstrates the suitability of the site for the development proposed.
- Action needs to be taken now through the planning “application system” to ensure that Exeter can boost its critical housing land supply because the failure to address such an important issue has been shown to lead to a slowdown in economic growth which would have considerable negative consequences for a sub region relying on the City to drive its economy.
- There would be provision of a significant area of land which would link up with adjacent applications extending Mincinglake Valley Park, providing Council controlled space for recreation and wildlife across the higher land to the north of the conurbation, protecting the city’s skyline in perpetuity, forming a backdrop to the City, and retaining the higher, (visible) hills from development.

2.6 A number of technical reports (including: Masterplanning and urban design; highways; landscape; arboriculture; ground conditions; heritage and archaeology; ecology; flood risk and drainage) individually, and together show that there are no technical reasons to withhold planning permission.

Policy Context and Background

2.7 The application has been assessed and developed in the following policy framework:

- National Planning Policy Framework (NPPF)
- Exeter City Council's Planning Policy Framework
- Local Appeal Decisions APP/Y1110/W/18/3202635 (Land off Clyst Road), APP/Y1110/W/22/3298452 (Land off Pendragon Road) and APP/Y1110/W/22/3292721 (Land off Spruce Close)
- Appeal Decisions APP/B1930/W/20/3265925 and APP/C1950/W/20/3265926 (Land off Bullens Green Lane, Colbey Heath)

Relevant Planning History (Land Adjoining and Nearby)

2.8 Relevant planning history on the application Site:

- 21/1291/OUT (Outline planning application for a development of up to 150 dwellings, community hub, access, and associated infrastructure (all matters reserved except access) on land to the north of Exeter, Stoke Hill – Withdrawn

2.9 Relevant planning history to adjoining sites:

- 21/0020/OUT (Outline planning application for a residential development of up to 100 dwellings and associated infrastructure (all matters reserved except access) on land off Pendragon Road; - Refused but allowed on appeal, and,
- 20/0538/OUT (Outline planning application for up to 93 dwellings on land at Spruce Close and Celia Crescent, Exeter (which went to Committee with an Officers' recommendation for approval) – Refused but allowed on appeal

2.10 Application 20/0538 proposed some 25 acres of open space to accompany the residential development proposed. It is clear to see from this application (and submitted indicative plans) that our client could also provide a significant area of land to the east of Mile Lane which could link up with the open space proposed for the development at Spruce Close and Celia Crescent significantly increasing the scale of

Mincinglake Valley Park. This significantly expanded tranche of “green” land would enable the Council to control the Cityscape in perpetuity, providing a significantly better recreational and natural resource for a growing City population.

2.11 Other relevant planning applications in Exeter:

- 21/0894/OUT (Outline planning application for up to 100 dwellings and associated infrastructure (all matters reserved) at land to the west of Clyst Road, Topsham – Refused but allowed on appeal
- 17/1148/OUT (Outline planning permission for up to 155 residential units and a 64 bedroom car home at land to the west of Clyst Road, Topsham – Refused but allowed on appeal

3 Site and Surroundings

- 3.1 The site is located on the northern edge of Exeter, to the east of Stoke Hill. Approximately 4.88 Ha in area, it is bounded to the west by Stoke Hill and to the east by agricultural land. Mincinglake Valley Park (County Wildlife Site CWS) lies to the south and east of the site. A small number of residential dwellings are located near the northern boundary.
- 3.2 Rising northerly, the land is currently in agricultural use. The boundaries are typically lined with hedgerows and trees. A small, wooded area is in the southern part of the land tranche. Access to the site is via a field gate on Stoke Hill Road, which is located on the western boundary.
- 3.3 On the edge of the City, its proximity to long established and emerging residential development means that the scheme would integrate seamlessly into the urban fabric, with local existing and planned facilities and services (including recreation, education, retail, and public transport provisions) within “walkable” and “cyclable” distances.

4 Proposed Development

4.1 From the Illustrative Masterplan, the proposal would create an attractive, connected, and distinctive parkland valley village neighbourhood at the northern fringe of Exeter in which people would want to live, providing:

- Up to 85 dwellings (35% affordable) with a mix of tenures catering for a healthy, zero carbon and flexible lifestyle across 1.86ha
- A community hub;
- 3.1ha of multi-functional green space and infrastructure, improved linkages, and enhancements to the Mincinglake Valley Park (delivering biodiversity net gain); and,
- Social and community infrastructure.

4.2 The scheme would align fully with core aims of the NPPF and the Local Plan (and for that matter the GESP) in that it would provide dwellings in a highly sustainable location, mirroring Exeter City Council's Vision documents, like Liveable Exeter, (and in the absence of up-to-date policy) on how 21st century housing development in the City should proceed.

Masterplan Illustrative Layout

4.3 The key elements of the Masterplan are as follows.

- Keeping all new built form below the 115m contour
- No development on the steeper open upper slopes of Stoke Hill
- Retention and enhancement of existing hedgerows and trees
- Density of the development responds to landform
- Development set back from the edge of Mincinglake Valley Park to retain quiet qualities of the park
- Designed carefully working with the topography minimising landscape and visual impacts.
- Layout to maximise solar orientation
- Guided by safe street design principles, including natural surveillance, street trees, and shared surfaces
- Achieving biodiversity net gain by incorporating native species hedgerow enhancements. New tree planting, species rich grassland and marginal wetland planting

- Multi-functional landscape, which provides opportunities for informal exercise, recreation, and play
- Modern standards of housing design
- Creation of a series of residential clusters inspired from the farmstead reference, with each cluster having a subtle change in character to respond to the different terrains of the hillside
- Landscape breaks between the housing clusters.
- Green breaks connecting into existing green infrastructure, creating permeable biodiverse networks.

Amount and Use

- 4.4 The layout has been designed to accommodate up to 85 dwellings, using a variety of types and sizes and providing a broad range of units. The indicative mix proposed is designed to meet local needs with appropriate proportions of each housing type and tenure. The final mix and the affordable allocation would be agreed with the Local Planning Authority.
- 4.5 Given the intention to create a new “feathered” edge to Exeter, the development has evolved to create a green and leafy overall appearance.
- 4.6 Building types have been positioned to work within the identified constraints and topography, to create a design structure based around green living and a sense of community.

Scale

- 4.7 The height of the houses responds to the topography across the site. The scale of proposed development has been divided into 2 areas.
- 4.8 To the north dwellings will be up to 2 storeys in height with some structures being 1- storey outbuildings and garages. To the south, the dwellings will be up to 2.5 storeys with some instances of 3 storeys, reflective of the local townscape character. These buildings will sit within the lowered contours of the southern part of the site, this will help to bed these buildings into the landscape and provide a pleasant massing, as the site slopes to the south. The height of the existing barn is about 8.5 m (height to ridge). It sits within the heart of the created arrival space.

Access and Street Hierarchy

- 4.9 All matters are reserved apart from access. The main vehicular access is proposed from Stoke Hill.
- 4.10 New pedestrian and cycle routes is proposed to the south of the site, linking Stoke Hill Road, with potential future access to be provided to Mincinglake Park, to the south east.
- 4.11 Particular attention has been given to the sloping nature of the site and topography in developing the access and on-site movement corridors and achieving safe and convenient multi modal movement patterns. The emphasis has been on achieving an accessible low traffic, low speed, walkable, and cyclable, urban village neighbourhood.
- 4.12 The proposed internal road network has been based on enabling the housing layout to efficiently work with (not against) the topography with thought given to vehicle tracking, visibility, and possible drainage requirements.

Parking

- 4.13 Parking provision has been carefully considered to ensure an appropriate level of car parking across the site and in a variety of forms to allow for electric vehicles to be used. Visitor parking areas have been identified where appropriate. Parking is provided on-street, on-plot, in garages or within courtyards. Parking has been integrated into the scheme so that vehicles would not dominate the street scene and public spaces.

Landscape and Open Space

- 4.14 The Masterplan provides a comprehensive landscape led scheme ensuring the scheme promoting a good quality of life by enhancing connectivity with the wider landscape network. The landscape proposals have been developed as an integral part of the Masterplan and in close discussion with landscape consultants, ecologists, arboricultural consultants, and drainage engineers.
- 4.15 The landscape strategy is focused around creating a series of green links and breaks throughout the development, reinforcing the connections to Mincinglake Valley Park and supplementing this with new planting. Landscape and visual impacts have been minimised through the position of housing, which sits

within the landscape and informal planting has been used across numerous areas of public space to mitigate development impacts. Native species hedgerow enhancements, tree planting, species rich grassland and marginal wetland planting is illustrated to achieve a biodiversity net gain. Opportunities for local food growing and allotments also exist alongside the Community Hub.

5 Planning Policy

- 5.1 The key planning policy relevant to the proposed development is set out in the National Planning Policy Framework (NPPF) and the Local Development Framework (LDF).

Key National Policy (NPPF)

- 5.2 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective—to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.3 Para 11. Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 5.4 To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 5.5 NPPF Para 11 states that.... Councils should... meet the development needs of their area... "as well as any needs that cannot be met within neighbouring areas...".
- 5.6 Para 12. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making....Local planning authorities may take decisions that depart from an up-to-date development plan....if material considerations in a particular case indicate that the plan should not be followed.
- 5.7 Para 48. Local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework.
- 5.8 Para 63. where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) the agreed approach contributes to the objective of creating mixed and balanced communities.
- 5.9 Para 68. strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan periods; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

5.10 Para 69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

5.11 Para 74. Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan³⁸, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

5.12 Para 120. Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

5.13 Para 126. The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

- 5.14 Para 152. The planning system should support the transition to a low carbon future in a changing climate.... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Key Local Policy

5.15 Policy Context and Background

- Exeter Local Plan First Review 1995-2011 (saved policies)
- Exeter Local Development Framework Core Strategy
- Exeter City Council Supplementary Planning Documents “Residential Design” (2010)

Exeter Local Plan First Review (saved policies)

Housing

- 5.16 Saved Policies AP1 and AP2 provide the basis on which allocations have been made and set out the key tests against which new proposals will be judged.
- 5.17 Saved Policy AP1: development should be designed and located to raise the quality of the urban and natural environment and reduce the need for car travel. Proposals should be located where safe and convenient access by public transport, walking and cycling is available or can be provided.
- 5.18 Saved Policy AP2: priority will be given to meeting development needs on previously developed land and within existing centres. A sequential approach will be applied to the identification and assessment of new sites for office, housing (see policy H1), retail (see policy S1) and commercial leisure use.
- 5.19 Para. 2.12 of the Local Plan confirms that Policy AP1 (Design and Location of Development) and Policy AP2 (Sequential Approach) will be the ***“the key tests against which new proposals will be judged”*** e.g., where possible, proposals should be in areas which are highly accessible by sustainable modes (such as this site).

- 5.20 Saved Policies Policy H1 (Search Sequence) and Policy H2 (Location Priorities) state that proposals for housing will be assessed against a search sequence that accommodates the use of greenfield land. (As outlined above, the application site is greenfield in nature, but it is adjacent to the existing urban fabric. The search sequence is met. (Especially when viewed in the context of 5-year housing land supply issues that have continued for C10 years. The release of green land is long overdue.))

Highways

- 5.21 Policy T1 requires new development to facilitate the most sustainable and environmentally acceptable modes of transport. Policy T2 seeks to ensure that residential development is located in close proximity to services and facilities, including shops, buses, railway stations and health and social care. It prioritises pedestrians, cyclists, and public transport.
- 5.22 Policy T3 states that development should be laid out and linked to existing or proposed developments and facilities in ways that will maximise the use of sustainable modes of transport. Proposals should ensure that existing walking and cycling routes are safeguarded; suitable cycle parking provision is provided in line with the adopted standards; bus operation needs are considered; pedestrian and cycle links are provided to rail stations; and the needs of people with disabilities are considered.
- 5.23 The development site is accessible by bus, with multiple stops within walking distance of the proposed site providing services around Exeter on a frequent basis. The City's mainline railway stations are also accessible by foot and cycle link providing opportunities to travel to local and long-distance destinations.
- 5.24 The Local Plan states that the appropriate height of a development should be considered relative to the wider townscape, to adjoining buildings and space and to human scale. This should not, however, preclude innovation which may enhance the townscape and create new features.

Landscape

- 5.25 Saved Policy LS1: development which would harm the landscape setting of the city will not be permitted. Proposals should maintain local distinctiveness and character and: (a) be reasonably necessary for the purposes of agriculture, forestry, the rural economy, outdoor recreation, or the provision of infrastructure; or (b) be concerned with change of use, conversion, or extension of existing

buildings. Any built development associated with outdoor recreation must be essential to the viability of the proposal unless the recreational activity provides sufficient benefit to outweigh any harm to the character and amenity of the area.

Exeter Core Strategy (2012)

- 5.26 The Exeter Core Strategy was adopted in February 2012 and covers the period from 2006-2026. In accordance with Para. 215 of the NPPF, due weight should be afforded to relevant policies contained within the Core Strategy according to their degree of consistency with the Framework.
- 5.27 Exeter's approach to sustainable development is set out in the Core Strategy vision. It states:
“Exeter will embrace its role in the region as an area of growth... by providing houses, jobs and supporting infrastructure through maximising the use of previously developed land within the city, and through sustainable urban extensions...”

Housing

- 5.28 Policy CP1 (Spatial Strategy) seeks to ensure that development will be guided to the most sustainable locations, recognising the contribution to be made to growth by the existing urban area.
- 5.29 Policy CP4 (Density) states that residential development should achieve the highest appropriate density, having regard to site constraints, local amenity, the character and the quality of the local environment and the highway network.
- 5.30 Policy CP5 (Housing Supply) states that the supply of housing should meet the needs of all members of the community.
- 5.31 Policy CP7: On sites capable of providing 3 or more additional dwellings (irrespective of the number of dwellings proposed) 35% of the total housing provision should be made available as affordable housing for households whose housing needs are not met by the market. At least 70% of the affordable housing should be provided as social rented housing. The overall percentage of affordable housing and the tenure split will be subject to considerations of viability and feasibility. Where it is not possible for viability reasons to provide the full requirement of social rented housing, affordable rent provision would be considered, let as far as possible at social rented levels. The remaining balance of the

affordable housing should be delivered as intermediate affordable housing.

5.32 Development must also have consideration to design principles in the Residential Design SPD.

Landscape

5.33 Policy CP16 (partly, it seems, derived from LS1) the strategic green infrastructure (GI) network. The Exeter GI network has been identified to protect and enhance current environmental assets and local identity and to provide a framework for sustainable new development. GI will be an integral part of planning for the urban extensions at Monkerton/Hill Barton, Newcourt and Alphington. New multifunctional areas of green space and green corridors will be created to meet the needs of these new communities. A sustainable movement network will link the urban area to the urban extensions and beyond to the open countryside. To the east of the city green corridors, that incorporate multi-use trails (for cycling, walking and horse riding) and provide high quality biodiversity habitat, will link Exeter to the proposed Clyst Valley Park and on to Cranbrook.

- The character and local distinctiveness of the areas listed will be protected and proposals for landscape, recreation, biodiversity, and educational enhancement brought forward, in accordance with guidance in the Green Infrastructure Strategy, through the Development Management DPD, inter alia:
- the hills to the north and north west;
- the Valley Parks: Riverside, Duryard, Mincinglake, Ludwell,

and unavoidable impacts mitigated and compensated for, in accordance with their relative status.

5.34 Opportunities to provide green corridors, open space, and allotments, to enhance cycling and walking opportunities, to link existing habitats, to incorporate environmental assets and to integrate biodiversity, proposed by the Exeter Green Infrastructure Strategy, will be secured through partnership working, direct implementation and the application of Policy CP18.

The Residential Design SPD

5.43 The Residential Design SPD provides additional guidance on the Council's approach to residential development. The urban area is identified on the Proposals Map.

Regulation 18 New Draft Exeter Plan

- 5.44 Exeter City Council is preparing a new Local Plan that is expected to replace the existing Local Plan that covered the period 2020-2040.
- 5.45 The New Draft Exeter Local Plan aims to meet the housing needs of Exeter on brownfield land, a substantial proportion of which is existing high performing employment land. The Council accepts in a report to the Executive on the 27th June 2023 that this approach has various challenges associated with it due to the ‘significant viability and infrastructure needs’ of previously developed sites. Further it acknowledges in this same report that additional time and expertise are required to support this approach at Examination including evidence of viability. The viability and deliverability of the Regulation 18 Draft Exeter Plan (and its proposed allocations) has not been tested.
- 5.46 Further, for the emerging plan to be found sound, the Council must show that the proposed widespread loss of employment land is viable, weighed against the housing numbers anticipated, and that there is adequate additional employment and housing land available to meet the employment and housing requirements of Exeter and its surrounding districts. The New Draft Exeter Plan has fallen short in its Duty to Cooperate, to responsibly and sustainably identify and allocate the most appropriate land for development.
- 5.47 The Draft Plan does not demonstrate that a viable plan led approach exists or will soon exist to secure the housing numbers required in Exeter.

5 Year Housing Land Supply Position

- 5.48 ECC does not have a 5-year housing land supply (5YHLS). ECC’s 5YHLS Statement dated May 2023, which covers the five-year period from 1 April 2023 to 31 March 2028 stated that Exeter has 4 years and 4 months of land supply equating to 2,914 dwellings.
- 5.49 The shortfall in housing land supply in Exeter has been considered in the planning balance in recent appeal decisions. As part of the considerations of appeal reference APP/Y1110/W/22/3292721 (25th August 2022, pre-dating the most recent 5YHLS Statement,) for up to 93 dwellings at land off Spruce Close, the Council contended that the HLS position was 4.69 years. The Inspector however concluded that the shortfall was not as modest as the Council had purported but instead materially

worse. The Inspector placed significant weight to the delivery of market housing in the context of the national policy objective to significantly boost the supply of homes and the “less-than-modest” HLS shortfall in Exeter

- 5.50 Appeal decision APP/Y1110/W/22/3296946 (11th October 2022, again pre-dating the most recent 5YHLS Statement) for up to 100 dwellings at land west of Clyst Road again confirmed that the Council is unable to deliver a 5YHLS. At this time it was common ground between the appellant and the Council that the HLS position was approximately 4 years. The Inspector noted that the emerging Local Plan was at an early stage and therefore carried limited weight. The Inspector concluded that there was no substantive evidence to suggest that the Core Strategy’s minimum target of circa 12,000 homes would be achieved in the plan period and that the Council’s HLS shortfall was, at least, moderate. Significant weight was afforded to the proposed market homes in light of the NPPF objective of significantly boosting housing supply and the Council’s housing supply shortfall. The significant under-delivery of affordable housing was noted, and the need for such housing was described as acute. This decision attributed substantial weight to the proposals’ affordable housing contribution.
- 5.51 Most recently, appeal reference APP/Y1110/W/22/3298452 (24th August 2023, post-dating the most recent 5YHLS Statement) for up to 100 dwellings at land off Pendragon Road was allowed and again confirmed that the Council could not demonstrate a 5YHLS. The agreed position for the appeal being in the range of between 4 and 4.1 years (suggesting a worsening situation since the publication of the 5YHLS Statement). The Inspector confirmed that the provision of housing is one of, if not the most, important priorities of national planning policy. In that context the Inspector placed substantial weight of the proposed market housing and the policy compliant level of affordable housing.

6 Analysis

6.1 Sustainable Development - 5 Year Land Supply

- 6.1.1 It is widely acknowledged that Councils should “meet the development needs of their area”. (NPPF).
- 6.1.2 As described above, ECC does not have a 5-year housing land supply (5YHLS). ECC’s 5YHLS Statement dated May 2023 which covers the five-year period from 1 April 2023 to 31 March 2028 stated that Exeter has 4 years and 4 months of land supply equating to 2,914 dwellings. It is important to note that, as confirmed by appeal decision APP/Y1110/W/18/3202635 at land west of Clyst Road (January 2019), this shortfall dates back to at least 2010.
- 6.1.3 The Inspector in an appeal decision of August 2023 relating to land at Pendragon Road, confirmed that it is *‘common ground that the Council cannot demonstrate a five year supply of housing land’*. Further this decision noted that the agreed position for this particular appeal was in the range of between 4 and 4.1 years (suggesting a worsening situation since the publication of the 5YHLS Statement). . Substantial weight was afforded to the provision of market housing in the planning balance within this context.
- 6.1.4 Though the Council’s policy system is dated, there is a clear sequential approach to housing development embedded in the Saved Policies of the Local Plan and the Adopted Core Strategy. However, this approach has not been used in the Council’s decision taking, creating a vacuum, not only in policy, but in the delivery of housing. That is a main reason the Council’s 5-year housing land supply issue has been dire for so long,
- 6.1.5 It is acknowledged that Exeter City Council is preparing a new Local Plan that is expected to replace the existing Local Plan that covered the period 2020-2040. This New Draft Exeter Local Plan aims to meet the housing needs of Exeter on brownfield land, a substantial proportion of which is existing high performing employment land. The viability of the Regulation 18 Draft Exeter Plan (and its proposed allocations) has not been tested. As such, this Draft Plan does not demonstrate that a viable plan led approach exists or will soon exist to secure the housing numbers required in Exeter. Further, recent appeal decisions confirm that the New Exeter Plan is still at an early stage and therefore can only be attributed limited weight in the planning balance.

- 6.1.6 The long-standing critical housing shortfall, has led to the point where there is a compelling and urgent need for additional housing: therefore **any application that delivers housing must be considered as sustainable development**. (i.e., This clear housing need is a material consideration that should contribute very significant weight in favour of *any* application for housing).
- 6.1.7 This scheme, and its importance in delivering housing in the City of Exeter, could be considered as exceptional in the context of NPPF Paragraph 12. Appeal decision APP/B1930/W/20/3265925 and APP/C1950/W/20/3265926 Roundhouse Farm, Land Off Bullens Green Lane, Colney Heath concluded that a poor record at providing homes can amount to very special circumstances. The appeal decision also made clear that Local Planning Authorities can no longer simply rely on historical decisions regarding land outside the settlement boundary, where the site can be proven to be a suitable location for sustainable growth.
- 6.1.8 However, far from advocating housing development at whatever cost, in whatever location, by following National policy within the NPPF and by applying (in the right and proper way) the Council's own sequential planning policies (AP1, AP2, H1, CP1 and DD1), greenfield sites in sustainable locations could, and should, be released now for housing development, **where the adverse impacts of doing so would not significantly and demonstrably outweigh the benefits**. (That, in our view, is the correct interpretation of the City Council's planning policy framework in the context of the NPPF.)
- 6.1.9 Consequently, housing sites in sustainable, edge of City locations, should be considered favourably to ensure that Exeter's housing needs can be met and to ensure that ECC can try to achieve a 5-year supply of housing land.
- 6.1.10 This position is magnified via the recent appeal decisions on land adjoining the site (application 20/0538/OUT for up to 93 dwellings on land at Spruce Close and Celia Crescent, Exeter and 21/0020/OUT for up to 100 dwellings on land off Pendragon Road).

Sustainable Development – Sequential Approach

- 6.1.11 Saved Policy AP2 states that priority will be given to meeting development needs on previously developed land and within existing centres, but that a sequential approach will be applied to the identification and assessment of new sites for housing under H1 and H2. These policies state that proposals for housing will be assessed against a search sequence **that accommodates the use of**

greenfield land. Appeal decision APP/Y1110/W/22/3292721 for land off Spruce Close confirmed that Policy H1 broadly aligned with the NPPF where reliance on accessibility to jobs and services by means other than by car exists. Further it confirmed that Policy H1 does not preclude development on sustainably located greenfield land.

6.1.12 When viewed in the context of 5-year housing land supply issues that have continued since 2010, the Council has been unable to deliver the level of housing development required on brownfield sites only. Under the sequential testing as defined in the policies (viewed holistically) clearly the release of suitable greenfield land for housing is long overdue.

6.1.13 Taken on, the evidence contained in the supporting documents accompanying the application confirms that the site is in a sustainable location. It is immediately adjacent to existing urban development and will integrate well with it. It is within walking distance of a range of local facilities and a range of measures are also proposed, giving widespread access to other parts of the city and beyond by public transport. There is no conflict either with Core Strategy Policy CP1 or Saved Policy AP1.

6.1.14 Although it is recognised that the site is within the “landscape setting” of Exeter as defined on the Proposals Map, Saved Policy LS1 only restricts development which would harm the landscape setting of the City. It therefore should not, as a matter of principle, restrict development within the landscape setting where no harm would be caused, such as the application site (as confirmed in our submitted LVIA).

6.1.15 In any case, we consider that Policy LS1 is now incompatible with delivering the scale of housing development that is necessary in the period to 2026 and it is considered that little weight can be afforded to it, given that it is out of date in terms of the provisions of the NPPF (and the Adopted Core strategy), and within the context of a catastrophic shortfall in the supply of deliverable housing land. Appeal decision APP/Y1110/W/22/3292721 confirmed that it was common ground between the applicant and the Council that Policy LS1 is inconsistent with the NPPF and should carry very little weight.

6.1.16 Amplifying, the Appeal decision APP/Y1110/W/22/3296946 for land to the west of Clyst Road, Topsham made specific reference to the fact that for the Council to meet the Core Strategy housing requirement and to achieve a 5YHLS, permissions would need to be granted on land that is subject to Policies LS1 and CP16. The Council must therefore accept that land outside the City boundary that is

subject to the outdated Policy LS1, must now be considered for housing development, (including land that is acknowledged as having some landscape sensitivity).

6.1.17 Notwithstanding these points, whilst it is acknowledged that any development of greenfield locations for new housing will give rise to landscape and visual change, the fact that change will occur is not in itself harmful or adverse. The site does not form part of a valued landscape (NPPF para. 174) and the landscape character of the area has been recognised in the development of the proposals. The proposal responds positively to the location and has been landscape led. The new settlement edge is permeable in terms of access and visibility, rich in landscape assets and delivers a variety of spaces, functions, and environmental benefits. This design approach reflects the aims of para. 98 of the NPPF.

6.1.18 Specifically on landscape setting of the City, from the application Masterplan it is clear to see that our client could provide a significant area of land to the east of Mile Lane which could link up with the open space proposed for the development at Spruce Close and Celia Crescent, all extending across to Mincinglake Valley Park (significantly increasing the scale of Mincinglake Valley Park). This expanded tranche of “green” land, would provide Council controlled space for recreation and wildlife across the higher land to the north of the conurbation, protecting the city’s skyline in perpetuity, forming a backdrop to the City, and retaining the higher, visible hills from development.

Sustainable Development – Tackling Climate Change

6.1.19 The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF sets out that planning should proactively drive and support sustainable economic development to deliver the homes and thriving local places that the country needs and that every effort should be made to objectively identify and meet the housing development needs of an area, but not at any cost.

6.1.20 In June 2019, the Government set a commitment in the Climate Change Act 2008 for the United Kingdom to reach ‘net zero’ greenhouse gas emissions by 2050. Councils across the country are now being asked how they can accelerate meeting Government’s targets in their own areas. The renewed focus on how regions can plan for reducing carbon emissions from our homes and communities, is unprecedented.

6.1.21 At the local level this means that Councils should be looking at how they can secure carbon reduction through their plan making and decision taking. Inevitably, a key focus will be on the residential sector, which is the source of 15% of the UK's emissions. The challenge is reconciling how to meet climate change targets, whilst also delivering the new homes and buildings that will meet local needs.

6.1.22 This distinctive scheme proposes to respond to the climate crisis, through both design and technical measures, which will encourage a culture shift in the way we live and help the move towards a more sustainable future.

6.2 Summary – Principle of Development

6.2.1 It is increasingly clear that the Council needs to encourage housing development to come forward in all appropriate locations within the City to help meet housing needs.

6.2.2 The situation can be summarised as follows:

- There is an undeniable 5-year land supply issue, which is longstanding;
- The policy for addressing such a shortfall is out of date and has been historically wrongly used to restrict development;
- The last 10+ years has shown that the shortfall in land supply cannot be addressed by brownfield sites alone;
- All applications for housing must be seen as sustainable, in the context of this urgent and undeniable housing shortfall;
- Greenfield sites for development should be brought forward under the sequential tests, where they are sustainable and the adverse impacts of doing so would not significantly and demonstrably outweigh the benefits;
- As demonstrated by the following technical analysis chapter, the site would generate no adverse impacts.

6.2.3 But it is clear in any event that this planning application addresses a long demonstrated and widely acknowledged shortfall in housing supply in a City where the development plan is out of date and has been for some time and where the house price to earnings ratio is now one of the worst in the country. It would not have adverse impacts (as per 6.3 below) that would “*significantly* and *demonstrably*”

outweigh its benefits. Inevitably, therefore, it is a proposal for sustainable development which should be approved without delay.

6.3 Technical Matters

6.3.1 The foregoing text outlines why the principle of development should not be in doubt, but technical matters still need to be addressed. To address them, guide the Masterplan and to accompany this planning application, several consultant reports were commissioned as follows:

- Highways and Transport
- Landscape
- Ecology
- Arboriculture
- Flood and Drainage
- Archaeology

Highways and Transport

6.3.2 In accordance with best practice, pre-application consultations have taken place with Officers at DCC. The development of the access and movement strategy alongside the Illustrative Masterplan has had regard to the Council's SPDs and the principles contained in Manual for Streets.

6.3.3 A hierarchical approach is proposed prioritising walking, cycling and public transport over that of the private vehicle whilst providing essential access for emergency and service vehicles. This, amongst other complementary measures, requires that appropriate infrastructure is built into the development to facilitate safe and convenient movement by foot and cycle within a permeable and well connected layout. This approach will ensure that it will not be necessary for residents to be car owners in order to travel within or outside of the development.

6.3.4 The travel demand management strategy has examined the opportunities for implementing both transport infrastructure and complementary measures by:

- providing attractive, safe, and convenient corridors for pedestrians and cyclists with off-site connections and improvements to adjoining networks;

- a community hub with provisions for E-bike rental, demand responsive public transport, bus loop and bus stops, EV charging infrastructure and car club provision
- street and layout design giving greater emphasis to sustainable travel
- a contribution towards a Community Travel Plan to be worked up in consultation with ECC/DCC.

6.3.5 The principal access point on to Stoke Hill, this is over an existing site access which has been upgraded. Particular attention has been given to the sloping nature of the site and topography in developing the access and on-site movement corridors and achieving safe and convenient access. Close to the access, a neighbourhood Community Hub is proposed. Within the building, a space will be available for a mix of uses. Parking spaces (for cycles and vehicles) will be provided alongside EV charging, cycle, and E-bike hire. Manoeuvring space and shelters will be provided for a community based electric bus terminus. The hub will be accessible by foot from all dwellings and generally less than a 5 minute walk from home to hub.

6.3.6 An alternative access, from within the site, will be provided to the radio mast and to the dwelling currently served from the existing access track. Opposite the access point, on the western side of Stoke Hill, there is an existing recreational route for walkers which leads to the valley floor. Provision will be made at the development's access point to provide a safe crossing to link to this off-site recreational corridor. Pedestrian and cyclist links to the Mincinglake Valley Park and Stoke Hill are proposed. Scope also exists to provide off-site footway improvements on Stoke Hill which will benefit existing and future residents.

6.3.7 The illustrative masterplan, achieves the design aims of Council SPD's and the principles contained in Manual for Streets. Roads and streets can be laid out to accommodate all users along low speed corridors with good surveillance and frontage access. There are opportunities for shared surfaces, landscaping, and on-street parking.

6.3.8 The submitted Transport Assessment indicates that the proposed development of up to 85 dwellings is likely, worst case, to contribute 38 vehicular movements at peak times to the wider network. The Community Hub will be a focal point for this new sustainable neighbourhood. The potential mix of uses will capture and internalise a number of trips. Junction modelling outlined in the Transport Assessment, confirms that the proposed development will have a minimal impact on the performance of the junctions in proximity of the site.

- 6.3.9 The approach advocated by the Transport Assessment is to aim for a maximum parking ratio of 1.0 spaces per dwelling which reflects the Council's maximum parking standards of 1.5 spaces per dwelling. This will support the overall approach to travel demand management and is bolstered by the alternative means /choices for travel within and from the development. Car parking can be provided on plot, on-street and as illustrated by the illustrative masterplan.
- 6.3.10 The provisions for pedestrian movement within and out of the development will encourage active travel. E-bike and cycle hire will be available adjacent to the proposed Community Hub. Cycle parking will be provided within the curtilages of the dwellings. Based on recent trends it is anticipated that there will be an even greater take up in cycling given the continuing success of E-bike and cycle sales and the growing popularity of micro-mobility (for example E-scooters). The Exeter Transport Strategy (ETS) confirms the success achieved already with E-bike hire and its car club fleet and the Council proposes to expand and extend these. Work from home and flexible working is now becoming "a new normal".
- 6.3.11 The submitted Transport Assessment details the existing bus services from the two nearest bus stops, approximately 400m (Mincinglake Road Top) and 700m (Collins Road) from the site. These services run approximately every 30 minutes and provide convenient travel options to locations in and around Exeter. In addition, a community demand responsive electric mini bus service or extension of the existing bus service can be provided to the development. Stagecoach South West have been consulted regarding options for both Demand Responsive Transport Service and for extending existing services. Stagecoach has advised that existing services could be easily detoured/extended to the proposed Community Hub within the development site.
- 6.3.12 The submitted Transport Assessment also notes that Co Cars has been consulted to consider the scope for E Car hire and E bike hire provision within the Community Hub. Co Cars have confirmed its interest in providing a service and enabling car club and public EV charging facilities to be installed at the Community Hub.
- 6.3.13 A site travel plan, operated by DCC, can be set up and operated to ensure all residents are familiar with the travel choices and routes available to key destinations.

6.3.14 In conclusion the assessment demonstrates that there are no technical reasons to withhold planning permission from a highways perspective.

Landscape

6.3.15 The application site forms part of the settlement fringe, adjacent to existing residential development on its southern, western, and eastern sides. The site is not within any national statutorily designated landscape, nor is it within or near other designated landscapes.

6.3.16 The LVIA that accompanies the application undertakes a detailed assessment. Whilst it is acknowledged that any development of greenfield locations for new housing will give rise to landscape and visual change, the fact that change will occur is not in itself harmful or adverse. The site does not form part of a valued landscape (NPPF para. 174) and the landscape character of the area has been recognised in the development of the proposals.

6.3.17 The LVIA acknowledges that during the construction phase of the development, there will be continuous change to the landscape and views experienced by residents and those moving around the area. The construction effects however will be temporary in nature. The permanent landscape effects will be localised, and the changes are consistent with the established settled character of this part of Exeter. The LVIA notes adverse visual effects in respect of adjoining residents or those travelling in close proximity and for those using Valley park, albeit these will be localised to specific locations in the park. It is acknowledged that the degree of visual change, diminishes with distance and so the greatest effects are experienced from places in close proximity to the site.

6.3.18 The proposal creates a complementary area of new housing within a connected framework of multifunctional green infrastructure serving the local and wider community, enabling a comprehensive solution to growth. The proposed development responds positively to the location and has been landscape led. The LVIA is based on strategic analysis prior to the identification of the developable areas. The recommendations have been adopted and ensure that the continuous open backdrop to the northern edge of Exeter is retained.

6.3.19 The masterplan has been informed by extensive, comprehensive, and detailed technical analysis across a range of disciplines. The design approach has sought to respond positively to the environmental constraints of the site. The new settlement edge is permeable in terms of access and

visibility, rich in landscape assets and delivers a variety of spaces, functions, and environmental benefits.

- 6.3.20 Mitigation measures have been incorporated into the proposed development and have informed the housing numbers proposed. To avoid impacts on the higher ground, most valued as the backdrop to Exeter and protect the skyline north of the city all new development has been kept below the 115m contour and no development has been proposed on the steeper upper slopes of Stoke Hill. The open fields, and therefore, open skylines, are conserved by this approach. All new housing has been located in proximity to the existing settlement edge and storey heights have been limited to ensure buildings do not become overly prominent and reflect the prevailing townscape character in the vicinity of the site. All existing vegetation has been retained and tree cover has been increased to strengthen the containment function of the existing woodlands and hedgerows. Development has been set back from the edge of Mincinglake Valley Park to retain its relative quiet qualities of the park.
- 6.3.21 Enhancement measures are proposed to respond to the landscape opportunities including the provision of allotments and community orchards providing the community with the ability to grow crops and opportunities to enhance learning opportunities. Extensive florally diverse grassland is proposed to ensure the amenity of residents and improve and enhance the biodiversity of the settlement edge. Drainage features on site have been positively designed to create areas which enhance biodiversity and the environment for occupiers. New linked footpaths increase and enhance the accessibility for the local residents and provision of open-air recreational opportunities.
- 6.3.22 Based on the evidence in the LVIA the proposed development would not be harmful to the integrity of the landscape setting of the City, meaning that the development proposed would not conflict with Policies CP16 or LS1.
- 6.3.23 The LVIA demonstrates that there are no technical reasons to withhold planning permission from a landscape impact perspective.

Ecology

- 6.3.24 The proposals would result in a range of ecological impacts. The proposals have the potential to result in increased recreational pressure on the nearby Exe Estuary SPA and have the potential to negatively impact the adjacent Mincinglake Plantation CWS.
- 6.3.25 The applicant, however, owns areas of land adjacent to the site, within which biodiversity offsetting could be implemented, if required (following calculations).
- 6.3.26 Outline ecological mitigation and compensation measures are proposed in the form of habitat creation (tree planting, areas of green space, attenuation features, and allotments), the creation of species-rich hedgerows along with protective measures (sensitive lighting plan, protection of bat routes across the site) and nesting/roosting provision within new structures (integrated bird and bat nesting/roosting provision).
- 6.3.27 It is considered that the proposals are unlikely to result in any significant ecological impacts, and that it is possible to suitably mitigate and compensate for the predicted impacts on the site or on adjacent land in the applicant's ownership.
- 6.3.28 The assessment demonstrates that there are no technical reasons to withhold planning permission from an ecology perspective.

Arboriculture

- 6.3.29 The overall arboricultural impacts are assessed across the site as moderately adverse. The reporting concludes that there is a planting plan throughout the site with sufficient open space to grow at least 40 replacement trees of large species, to their full size, and a similar number of smaller tree species. With the recommended construction methods and the replanting, the impacts can be minimised and mitigated for. In conclusion, the work submitted demonstrates that there are no technical reasons to withhold planning permission from an arboricultural stance.

Flood Risk and Drainage

- 6.3.30 The Report demonstrates that the proposed residential development would be at a low risk of flooding, lying in Flood Zone 1, with safe access always maintained to the site. The site is at low risk of flooding from other sources.
- 6.3.31 A Drainage Strategy has been proposed which delivers safe and sustainable solutions on site, which meets the required tests and policy. Details of the drainage strategy are outlined within the accompanying reporting and detailed on the indicative Masterplan submitted.
- 6.3.32 In conclusion, the future occupants and users of the proposed development will be safe from flooding and the site can deliver sustainable drainage solutions. The proposal complies with the National Planning Policy Framework (NPPF) and local planning policy with respect to development at this location.
- 6.3.33 There are no technical reasons to withhold planning permission from a flood risk or drainage perspective.

Archaeology

- 6.3.34 The assessment found that the proposed development site is situated within agricultural land to the northwest of Mincinglake Valley Park, Exeter. There are currently no records of heritage assets within the site on the Devon Historic Environment Record, although the site is situated approximately 280m to the southwest of a possible enclosure of potential Neolithic date that is visible as a cropmark within aerial imagery.
- 6.3.35 The assessment concludes that the proposed development site is situated within a landscape in which there is known evidence for prehistoric and Roman occupation. There is therefore considered to be potential for previously unknown below-ground archaeological deposits of these dates to be present within this landscape and the site is considered to have some topographic potential for both prehistoric burials and later prehistoric/Romano-British settlement. The site also has palaeoenvironmental potential, possibly including organic deposits, based on the presence of two infilled combe heads.

- 6.3.36 The land within the proposed development site has historically formed part of an agricultural landscape to the east of Stoke Hill, and there is potential for below-ground archaeological deposits relating to former land division recorded on historic maps to survive as infilled ditches beneath the current ground surface within the site, and for below-ground archaeological deposits relating to a former linhay and a house and garden, which are shown on the tithe map of 1842.
- 6.3.37 Using the methodology outlined in The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3 (Second Edition) any impacts of the proposed residential development upon the setting of heritage assets within the vicinity of the site have been considered. Overall, it has been concluded that the aspects of setting that contribute towards the significance of these assets will remain unaffected by the proposed residential development.

6.4 Summary - Technical

- 6.4.1 There are no reasons to withhold planning permission on technical grounds. Together and individually, the technical reporting demonstrates that the proposed development would not have adverse impacts that would “*significantly* and *demonstrably*” outweigh its benefits. Inevitably, therefore, it is a proposal for sustainable development which should be approved without delay utilising National and local sequential policies.

7 Conclusion

- 7.1 McMurdo Land Planning and Development Ltd (“McMurdo”) submits this Outline Planning Application for a pioneering new development of up to 85 dwellings (35% affordable), community hub, access, and associated infrastructure (all matters reserved bar access) on land to the north of Exeter, Stoke Hill, on behalf of Mr J Drake and Family (“client” and “applicant”).
- 7.2 The preceding chapters outline the following:
- There is an undeniable 5-year land supply issue, which is longstanding;
 - The policy for addressing such a shortfall is out of date and has been historically wrongly used to restrict development;
 - The last 10+ years has shown that the shortfall in land supply cannot be addressed by brownfield sites alone;
 - All applications for housing must be seen as sustainable, in the context of this urgent and undeniable housing shortfall (circa 4 years supply);
 - Greenfield sites for development should be bought forward under the sequential test, where they are sustainable and the adverse impacts of doing so would not significantly and demonstrably outweigh the benefits;
 - As demonstrated by the foregoing technical analysis, the site would generate no adverse impacts.
- 7.3 This scheme for a sustainable, urban village community addresses a long demonstrated and widely acknowledged shortfall in housing supply in a City where the development plan is out of date and has been for some time and where the house price to earnings ratio is now one of the worst in the country. It would not have adverse impacts that would “*significantly* and *demonstrably*” outweigh its benefits. Inevitably, therefore, it is a proposal for sustainable development which should be approved without delay in line with National and Local policies.
- 7.4 We will be pleased to discuss the details of the application with Officers and Members as appropriate during the determination of it.



McMurdo Land Planning and Development Ltd

a Basement Office,
4 Baring Crescent
Exeter
EX1 1TL

e carly@mcmurdolpd.com
t 01392 422297
m 07547211458

Carly Millman
MRTPI
Planning Consultant
Land Planning & Development
Exeter