

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm** on **6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title	Ms
First Name	Fiona
Last Name	Johnson
Job Title (where relevant)	
Organisation (where relevant)	Telereal Securitised Property GP Limited
Address Line 1	c/o Agent
Line 2	
Line 3	
Line 4	

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

Mr

First Name

Christopher

Last Name

Schiele

Job Title (where relevant)

Director

Organisation (where relevant)

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Address Line 1

Brownlow Yard

Line 2

12 Roger Street

Line 3

London

Line 4

Post Code

WC1N 2JU

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

H2, H10

Policies Map

Site Ref. 151

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

X

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

n/a

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

n/a

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

n/a

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

X

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

All elements supported are similarly highlighted in section 5(b) below.

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Introduction & Background

On behalf of our client, Telereal Securitised Properties GP Limited, we hereby submit written representations to Exeter City Council ("Exeter CC"; "the Council") with regards to The Exeter Plan (Publication Plan: Regulation 19, December 2024).

About Telereal Securitised Properties GP Limited & its key landholding in Exeter

It is considered that it would be helpful to provide some background to our client who owns and operates a network of British Telecom telephone exchanges throughout the country.

In Exeter, our client is the freeholder of the *Exeter Rougemont Switching Centre/Telephone Exchange, Queen Street, Exeter, EX4 3SR* ("the site") which is subject to draft housing allocation ref. 151 (Rougemont Switching Centre).

As previously communicated to the Council, the site has been subject to a recent strategic asset review where it has been concluded that it will become surplus to operational requirements and, consequently, available for residential-led redevelopment by 2031, hence within the plan-period of The Exeter Plan.

Interest in The Exeter Plan

Due to its interest in the above site, The Exeter Plan is of significant importance to our client who has a strong interest in ensuring that it (particularly Draft Policy H2 and draft housing allocation ref. 151) creates a strong, flexible, ambitious and deliverable planning policy framework to facilitate the sustainable growth Exeter requires whilst optimising the site's development potential in order to maximise the public benefits it can deliver.

Once existing operations cease, the site represents a significant development opportunity on brownfield land in a highly accessible and sustainable city centre location. Our client therefore encourages the Council to be ambitious, and realistic, in relation to estimated capacity/density levels in its draft housing allocations to make most effective use of brownfield land in accordance with national policies (and wider draft policies contained in The Exeter Plan).

Soundness of The Exeter Plan

As the Council will be aware, for Local Plans to be found sound, **Paragraph 35** of the National Planning Policy Framework ("NPPF", 2023) [Paragraph 36 of the 2024 version; however, the 2023 version is referred to throughout as we understand the emerging plan will be assessed against it; if not further specified, references in these representations are to the 2023 version] it is important that they are:

- **Positively prepared:** Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified:** Based on an appropriate strategy, taking into account the reasonable alternatives, and proportionate evidence;
- **Effective:** Be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy:** To enable to delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Our client welcomes the general direction of The Exeter Plan and strongly supports its vision and objectives for the city centre. However, our client also encourages the Council to be more ambitious in relation to its draft housing allocation, and particularly ref. 151, to ensure they make most effective use of brownfield land in accordance with national policies, thereby resulting in a sound Local Plan.

Relevant Policy Framework and Development Plan

Chapter 11 of the NPPF sets out the Government's intention to make effective use of land and achieving appropriate densities. **Paragraph 123**, for instance, states that "[p]lanning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land".

Paragraph 124d further highlights that planning policies (and decisions) should "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used for effectively".

With regards to achieving appropriate densities, **Paragraph 128** requires that "[p]lanning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed and beautiful, attractive and healthy places".

In its 2024 version of the NPPF, the Government further emphasises that planning policies should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused" (**125c**).

As a result, it is needs to be closely assessed whether draft housing allocations and linked development sites are (1) deliverable and, in accordance with national policy, (2) make most effective use of brownfield land, and (3) are developed at appropriate densities with The Exeter Plan expected to provide a robust framework for sites to optimise their capacities.

Draft Policy H2 and Draft Housing Allocation ref. 151 (Rougemont Switching Centre)

The allocation of the site for residential-led redevelopment under draft housing allocation ref. 151 in Draft Policy H2 is positively noted and strongly supported by our client.

Site Capacity

As abovementioned, the site is expected to become surplus to BT's operational requirements by 2031 or earlier which requires a forward-thinking strategy to ensure this important brownfield site next to Exeter Central Station is effectively used once vacated by the current occupier and therefore avoids a long-term period of vacancy. This should be awarded significant weight in line with NPPF **Paragraph 121** and it is positively noted, and supported, that the Council agreed that a draft housing allocation is capable of guiding this transition process.

It is also worth clarifying that the site has been underutilised for a significant amount of time, not accommodating any regular on-site employment. Although historically there were in some cases office and support facilities within the Telephone Exchange buildings, any officer related employment has relocated to fit for purpose office buildings (see their "Better Workplace Transformation" programme). A redevelopment of the site will therefore not result in a loss or need for the reprovision of active or existing (office) employment floorspace.

The Exchanges are very similar to Data Centres in that they house communication equipment and "racks". They may also house cable chambers, equipment/plant/communications rooms. Openreach engineers and other Communication Providers who have equipment located in the buildings simply attend the property to maintain, upgrade or install their equipment. Openreach are looking to withdraw traditional copper-based technology in favour of fibre and this will result in the consolidation of their Exchange portfolio and these buildings becoming surplus to needs.

Whilst key principles of Draft Policy H2 are supported, it is considered that - in order to be fully consistent with the NPPF's requirement to make most effective use of brownfield land and developing sites at appropriate densities - the number of new homes to be delivered can and should be in excess of the quoted capacity of 86 for the site.

It is our understanding that the figure has been carried over from the Council's 2024 HELAA (page 672) and is based on the site's assumed 'developable area' (0.38 ha) and linked recommended minimum density levels set out, for instance, in the 2021 Exeter Density Study for city centre sites referring to 150 dwellings per hectare ("dph") for residential and 300-800 dph for student accommodation/co-living schemes. Having reviewed the site, it is considered that the developable area is likely larger than the 0.38 ha used in the Council's underlying evidence base taking our client's full site ownership into account and therefore has a direct positive impact on the built form, development quantum and resulting site capacities that can be achieved on site.

Whilst the site is subject to a few (policy) constraints which can be addressed (and mitigated, if needed) at planning application stage, it is important to reiterate its highly sustainable location in the city centre, adjacent to Exeter Central Station, and proximity to existing social infrastructure. Given its location, the site is also considered suitable to bring forward a landmark building aiding legibility towards the station (of course, fully tested in heritage, townscape and environmental terms).

It is further considered that the minimum density levels referred to above should be a starting point for less prominently located sites in the city centre, with draft housing allocation ref. 151 having the potential to go beyond those minimum levels in accordance with the objectives of NPPF Chapter 11.

Based on an initial review of the site by our client in comparison to wider city centre developments, the site's topography, developable area (which is deemed larger than considered by the Council), the existing significant bulk/massing of the telephone exchange and its potential for (minor) extensions/additional built form (where justifiable), it is considered that the site is capable of accommodating a **minimum** of 100+ residential units or 300+ student rooms (depending on type/size), potentially more subject to detailed feasibility testing and in response to approx. density levels. This assumes that the stretch of car parking is retained for the parking of vehicles/circulation, although a feasibility study will be undertaken to see if parts can be incorporated into a future development.

For comparison, the adjacent Queen Street Studios purpose-built student accommodation ("PBSA") development comprises 132 student rooms, but is only c.50 per cent of the site's area (see LPA ref. 14/0899/FUL), and subject to a density of approx. 1,320 student rooms per hectare (0.1 ha) which is largely reflective of its achieved/acceptable built form and highly accessible and sustainable development location.

As such, and to accord with national policies referred to above, it is recommended to modify the site capacity for ref. 151 to a minimum of 100+ new homes. This further ensures compliance between Draft Policy H2 and the objectives of **Draft Policy H15 (Housing density and size mix (Strategic policy))** seeking for "*Development proposals for new homes [to] optimise density*".

Further feasibility testing is expected to be undertaken by our client in the coming weeks to refine the site's capacity and will be shared with the Council once available.

Alternatively, and to reflect both the NPPF and Draft Policy H15, it is recommended that the Council clearly identifies the housing targets in Draft Policy H2 as **minimum** or **indicative** figures, avoiding any doubt that sites should be tested at application stage to ensure they maximise the use of brownfield sites and make best use of unique city centre opportunities.

Suggested modifications are set out in Section 5(c) below.

Land Use and flexibility on future residential product

In addition to standard housing, the site is further considered to be well-located to potentially provide PBSA (or alternative residential products such as co-living), as has been considered by the Council as part of the HELAA.

Given the location in the city centre and close proximity to university campuses, the site is considered to be highly suitable for PBSA provision (in addition to or instead of traditional housing), meeting all relevant requirements of Draft Policy H10. Maintaining flexibility to respond to (changing) local needs and demands at the time when a planning application for the site is coming forward is extremely important for The Exeter Plan.

It is our interpretation that a potential redevelopment of the site for PBSA (or co-living) would similarly be in accordance with the provisions of Draft Policy (H1 and) H2 (insofar as it relates to draft housing allocations), as PBSA similarly contributes to the Council's housing supply (as set out in Para. 30 of the *Greater Exeter: Student Housing Needs Assessment 2024* and under the provisions of draft **paragraph 6.63** of The Exeter Plan). This flexibility is strongly supported, as our client agrees that the provision of additional PBSA similarly has a direct (positive) effect on housing supply, freeing up conventional housing to other members of the community. Ensuring all relevant residential uses contribute to housing supply is therefore welcomed.

For the avoidance of doubt, this flexibility and the support for alternative residential products within its draft housing allocations should be referred to in the supporting paragraphs of Draft Policy H2. In the absence of a wider definition of 'new homes' (i.e. in a glossary), suggested wording is provided in Section 5(c) below.

Conclusion

As can be seen from our client's comments on The Exeter Plan, it is considered that some minor modifications can ensure compliance with national policies in relation to ensuring that draft housing allocations make most effective use of brownfield land and therefore ensure a sound Local Plan in this regard. However, the general direction as well as the principles associated with draft housing allocation ref. 151 are supported.

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Suggested addition

~~Suggested removal~~

Draft Policy H2:

Site: Rougemont Switching Centre

Reference: 151

Minimum [or 'Indicative'] number of homes: 100+

Reason: For the reasons set out in 5(b) above, the site is considered to be suitable/capable of accommodating a significantly higher number of new homes (either standard C3 housing or PBSA/co-living).

Site | Reference | **Minimum [or 'Indicative']** number of homes

Reason: For the reasons set out in 5(b) above and to ensure that the estimated housing numbers are not seen as upper thresholds or caps, thereby enabling individual sites to test capacities at application stage and make most efficient use of (brownfield) sites, in accordance with Chapter 11 of the NPPF, it is suggested to refer to a 'minimum' or 'indicative' number of new homes.

Paragraph 6.11: "The housing capacities in Policy H2 are net of any existing homes on a site **and may include conventional and build to rent housing as well as alternative forms of housing including homes for older people, supported house, co-living housing or purpose built student accommodation which similarly contribute to the Council's housing supply. Alternative forms of housing will only be supported where compliance with respective other policies of The Exeter Plan can be demonstrated.**"

Reason: For the avoidance of doubt and to ensure that housing targets/supply can be met through a variety of housing products/PBSA, as envisaged in respective policies of The Exeter Plan and their supporting paragraphs.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

X

No



6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

n/a

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

n/a

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

n/a

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

n/a

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Our client wishes to retain the opportunity to attend hearing sessions in relation to housing supply and/or draft housing allocations to discuss the proposed modifications and reasons behind suggesting those if required.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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