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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	Councillor
First Name	Diana
Last Name	Moore
Job Title (where relevant)	Leader of Green Group. Submission on behalf of Cllrs Banyard, Read, Rees, Bennet, Wetenhall, Ketchin.
Organisation (where relevant)	Exeter City Council
Address Line 1	% Civic Centre
Line 2	Paris St
Line 3	Exeter



Line 4

Post Code

EX1 1JN

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

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

CC1

Policies Map

Exeter
Biodiversity
Network Map

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

Yes

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)

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)

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)

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

Yes

No

☒

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)

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)

Policy CC1 unsound: Effectiveness (deliverability).

The objective for this section and policy cannot be effective or delivered if it is not fully specified, so that developers know what they need to provide, and development management is able to check development proposals against unambiguous requirements. CC1 requires some amendment in this respect.

CC1a: the requirement for ‘...*place specific solutions*...’ in this policy is imprecise and, as such, is not capable of delivery. The Plan needs to define place specific solutions by giving examples.

CC1b: “Minimising the need to travel and maximising walking, wheeling, cycling and public transport;” does not demonstrate how it accords with NPPF 108 d¹ as it fails to recognise the environmental impacts, mitigations and also gains in line with and NPPF 109². The significant reductions in greenhouse gas emissions required from transport in the city³ & ⁴ will not simply be met by ‘reducing the need to travel’ and ‘maximising journeys by walking, wheeling, cycling and public transport’. The policy should more specifically set out how it reduce greenhouse gas emissions from vehicles including reducing *reliance* on the private car⁵ i.e. fear journey by private car (5,p16), and *modal shift* to public transport and active travel and public transport which require specific policy objectives and relevant infrastructure enabled through the planning system.

CC1c: “Applying a fabric first approach to maximise energy efficiency;” needs to be underpinned by development design that explicitly builds in **demand reduction** and **energy efficiency ... demonstrable through a recognised standard**⁶. Reducing energy consumption is an explicit goal of the Net Zero 2030 plan for the city⁷ (part of ECC’s evidence pack) ‘Reduced Energy Consumption’⁸ and set out in Liveable Exeter Principle 4 Liveable buildings. “Ensure buildings are energy efficient, adopt a fabric-first approach and apply high performance standards such as Passivhaus and whole-life carbon assessment;”

CC1f: “Applying the principles of the circular economy” - is a welcome policy, however these principles are not defined locally and government guidance⁹ refers variously to waste and policy yet to be

¹ “the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;”

² ... through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

³ [1063 v1.1 Exeters greenhouse gas reporting 2024 DRAFT.pdf](#)

⁴ [blrdg12sxd1389a4iott.pdf](#) - GHG monitoring report 2019 - part of the evidence base

⁵ [Exeter Transport Strategy](#) part of the evidence base

⁶ [Certifications.pdf](#)

⁷ Exeter Net Zero 2030 plan [fizlagwhbiegwzbx7esv.pdf](#)

⁸ [fizlagwhbiegwzbx7esv.pdf](#)

⁹ [Circular Economy Package policy statement - GOV.UK](#)

developed¹⁰ so the wording is imprecise. The London Local plan policy¹¹ assists with a development of these ideas and clarification appropriate to the planning system.

CC1d: “Maximising renewable and low carbon energy generation” is an enabling policy. However demand reduction is omitted as a first principle in line with the Devon Carbon Plan ¹²- which will drive the effective implementation of the fabric first approach. Demand reduction also reduces the need for infrastructure associated with renewables and the grid.

CC1h: the requirement for ‘...**landscape-led schemes**...’ in this policy is imprecise and, as such, is not capable of delivery. The Plan needs to define landscape-led schemes by giving examples and referencing relevant policies outwith the Local plan such as the Local Nature Recovery strategy.

CC1g: This Policy is about achieving net-zero. While the requirements about reducing flood risk may well be deliverable in themselves, it is difficult to see ‘...how they will support the achievement of net-zero...’ (Policy CC1 line 3). This Chapter’s objective is to “Make the fullest possible contribution to the mitigation of, and adaptation to, climate change working towards a net zero carbon city” - and the requirements in CC1g help to build resilience and aid adaptation when dealing with climate change: as such they are welcome, but detailed measures should be set out in Policy CC8.

Policy CC1 unsound: Consistency with National Policy (NPPF 2023)

CC1a: NPPF (2023) para 159b includes **orientation** as a relevant factor to be taken into account in Plan making but CC1a does not mention it. NPPF (2023) para 162b also includes **orientation as well as landform and massing** as factors to be taken into account when determining planning applications: again these are missing from Policy CC1a.

The NPPF at para 162b cites these features’ usefulness in minimising energy consumption. This is not mentioned in Policy CC1 but should be as it is distinct from the Policy’s otherwise welcome reference to maximising energy efficiency, in CC1c, which is also – but separately – required by NPPF.

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)

To improve effectiveness:

1. Add to introduction of policy wording: *“New development is expected to incorporate sustainable design and construction principles of the highest environmental standards in order to reduce greenhouse gas emissions, conserve water, minimise waste and flood risk and enhance biodiversity, air and water quality.”*

¹⁰ [Circular Economy Taskforce - GOV.UK](#)

¹¹ [design for a circular economy web 1.pdf](#)

¹² [8. Energy Supply – Devon Climate Emergency](#)

2. Specify what is meant by “**place specific solutions**” in CC1 a (illustrating how the requirement will aid net zero) so that they can be delivered in development proposals.
3. Specify, within this policy, what is meant by “**landscape-led schemes**” (explaining how they contribute to net-zero, for instance in providing carbon sinks, nature recovery programmes and enhancing ecological networks) so that they can be delivered in development proposals. If they don’t contribute to net-zero, but are able to aid resilience and adaptation, move the requirement to Policy CC7.
4. Demonstrate how delivery of CC1g would aid net -zero. And specify the If it doesn’t do so, move the requirements into Policy CC8.
5. CC1b Reword policy to accord with NPPF (cited above above), for example: *“Development proposals will be required to demonstrate how they will support the achievement of Net Zero by minimising the need for private car travel, and provide sustainable alternatives including public transport, reducing vehicle emissions through the use of zero emission vehicles, including buses, and providing and contributing to a wider good network of safe and accessible cycling, walking and wheeling routes and public transport. Travel Plans should include an assessment of the carbon and other transport related emissions.”*
6. **Monitoring:** To include in S17 monitoring relevant indicators, targets and approach to align with policies in CC1 an indicator and target for the reduction in congestion and greenhouse gas emissions from transport in the city by the end of the plan period. To be achieved in partnership with other authorities based on the Exeter Local Plan and the Local Transport Plan.

Add in bold *“STC3: Supporting active travel” a target for 50% of trips within the city are being made on foot or by bike*”

This will amend the target to prived a specific target which accords with the Local transport plan targets.

7. Amend CC1c. to include *“Reducing energy demand and [applying a fabric first approach to maximise energy efficiency] to a recognised energy efficiency standard.”* This will accord with Principle 4 Liveable buildings and enable the application of the relevant standard for domestic or commercial properties and enable an assessment of the effectiveness of this policy.
1. Amend CCf: “Applying the principles of the circular economy” add... *“which ‘prioritises retention and refurbishment over demolition and rebuilding. It means designing buildings that can be adapted, reconstructed and deconstructed to extend their life and that allow components and materials to be salvaged for reuse or recycling.”* This addition specifies what is meant in regard to the circular economy, so will improve the effectiveness and deliverability of this policy.

To improve consistency with National Policy:

1. Amend CC1a to read ‘...Considering location, urban form, density, massing, landform, orientation...’

2. Amend wording of either CC1a or CC1e to mention minimising energy demand and consumption.

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

Yes

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)

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)

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)

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)

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)

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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)

As councillors (some of whom have sat on the planning committee) we have experience of trying to work with planning policy in practice and how planning decisions are taken within the Council.

As ward Councillors we have experience of how planning policy affects the community and local environment and the extent to which it may or may not be effective in achieving the stated policy outcomes. We are also advocates for our communities and have identified where planning policies are not effective in terms of meeting positive planning outcomes for our communities and local environment.

The issues we have commented on in these representations are ones which concern us most (having made previous representations). However, it should be noted that, there has been no opportunity for formal Scrutiny (as set out in the Local Government Act) of the local plan policies, despite our numerous formal requests. While the strategic direction was set by the administration and approved by Council it should be noted that the emerging plan policies have not subject to any formal political oversight, for example in a council strategic planning committee. Our group has objected to the process. We are therefore having to make a number of representations to the Inspector on the matters that will have the most impact on our communities and environment.

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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