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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 Policies 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)

S19(1A) Planning and Compulsory Purchase Act 2014¹ requires LPs include

"policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."

The strategic policy S1 does not adequately demonstrate how this will be achieved and describes achieving net zero as an 'ambition'.

Plan policies must be 'designed to secure' the outcomes including a robust assessment of the potential for local policy to achieve local emissions reductions over the plan period, taking into account the UK's net zero commitment under the Climate Change Act and a local target set in accordance with that potential; and an assessment of proposed policies' consistency with that target.

The Climate Change Act 2008 establishes a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels and June 2019 this target was strengthened, through the Climate Change Act 2008 (2050 Target Amendment) Order 2019, to commit the UK to reaching net zero greenhouse gas emissions by 2050. There has recently updated its emissions NDC

¹ [Planning and Compulsory Purchase Act 2004](#)

target been a NDC target to reduce all greenhouse gas emissions by at least 81% by 2035 compared to 1990 levels².

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)

An assessment of the extent to which the Local Plan policies will deliver on greenhouse gas emissions reduction in line with UK targets and impact on climate adaptation and resilience.

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)

Exeter's Spatial Strategy aims to deliver '*...the city's ambitions for net zero...climate change adaptation and resilience...*' as required by paras 157 and 158 of the NPPF (Dec 2023).

However, this aim is not sufficiently robust nor is it covered in the strategic elements of Policy S1, the overarching policy for the whole Plan, and as such does not comply with the NPPF (157³, 158). For instance, the Policy has no explicit or direct reference to the 'radical reduction' (NPPF 157) of emissions and energy demand; to the need to combat extremes of weather in the form of excessive heat, wind, or rain; or to the necessity of reducing demand for water.

The Government's 2021 Net Zero Strategy estimates that 82% of the UK's emissions are "within the scope of influence of local authorities". Exeter City Council and the City's 'Liveable Exeter Place Board' has an adopted policy and strategy with a more ambitious target of Net Zero by 2030 (included in ECC's evidence pack⁴).

² [UK's 2035 Nationally Determined Contribution \(NDC\) emissions reduction target under the Paris Agreement - GOV.UK](https://www.gov.uk/government/policies/nationally-determined-contributions)

³ 157. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. 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.

⁴ NET ZERO EXETER 2030 PLAN [fizlagwhbiegwzbx7esv.pdf](#)

Some of these issues are covered to an extent by the policies on Chapter 5 Climate Change, but given the significance of these issues both nationally and within the city ambitions that drive Policy S1, it would be appropriate for them to be included as one of the essential elements within Policy S1.

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)

Modification: amend line 6 of the Policy and add one additional numbered element to it, to ensure consistency with local and national policy. Wording could be along the lines of:

*The spatial strategy for delivering development in Exeter has **16** elements: (our emboldening)
16 Requiring all development to submit a statement showing how the development incorporates features or processes to mitigate climate change, adapt to its consequences and provide resilience to its impacts.*

(Note that policy CC1 contains a welcome relevant requirement, but it only relates to reaching net zero and not to energy reduction or adaptation and resilience.)

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)

The Sustainability Appraisal⁵ does not model or address the extent to which the implementation of the Local Plan will produce or reduce green house gases, or what contribution it will make in terms of achieving Net Zero 2030 a policy objective of Exeter City Council.

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)

☒

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.

⁵ [Sustainability Appraisal Report](#)

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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