

# 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](mailto: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

Mr

First Name

Nigel

Last Name

FitzHugh

Job Title (where relevant)

Chairman

Organisation (where relevant)

St Leonards Neighbourhood Association

Address Line 1

Line 2

Line 3

Line 4

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Post Code

Telephone number

E-mail address

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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)

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)

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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)

ECC's failure to carry out a review of of all prospective Local Green Space sites in Exeter when drawing up the Local Plan.

Details on next page.

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)

The SLNA understands that it may be impractical at this late stage in drawing up the Local Plan, to carry out reviews of this nature, however, we feel that our request to designate County Hall Grounds as a Local Green Space complies so perfectly with the criteria of an LGS that it should be considered and granted. This request is referred to in a separate representation made at the same time.

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)

ECC's failure to carry out a review of all prospective Local Green Space sites in Exeter when drawing up the Local Plan.

It has become good practice among many Local Authorities that, when drawing up a Local Plan, a survey of all green spaces in their area is made in order to understand provision and make sure that there will be a good balance between green spaces for communities and required development.

The lack of a research phase in order to carry the policy objective of to:- "Protect and enhance the city's unique natural setting provided by the hills, the Valley parks and River Exe, and improve, extend and connect natural green spaces and deliver net gains for biodiversity" is dereliction of a natural part of the planning process. To 'improve' and 'extend' one needs to know the status quo. Exeter City Council did not carry out such a survey and hence is not able to make balanced decisions on the allocation of such spaces. The drafting of a good plan requires knowledge of the status quo in order to guide future policy. For this reason we believe that the drafting of the Local Plan by Exeter City Council is UNSOUND.

THIS REPRESENTATION, ALONG WITH TWO OTHERS FROM THE ST LEONARDS NEIGHBOURHOOD ASSOCIATION MADE AT THE SAME TIME, IS SUPPORTED BY OVER 260 RESIDENTS AND USERS OF THE COUNTY HALL GROUNDS. NAMES AND EMAIL ADDRESSES CAN BE SUPPLIED ON REQUEST.

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)

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**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)

**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.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>