

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

Cllr

First Name

Michael

Last Name

Mitchell

Job Title (where relevant)

Organisation (where relevant)

Exeter Liberal Democrats

Address Line 1

35a Howell Road

Line 2

Exeter

Line 3

Line 4

Post Code

EX44LT

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

6.1, 6.2

Policy

Homes

Policies Map

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

Yes

No

X

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)

The removal of the former H5 b relating to the need to maintain community balance.

The removal of this without any formal discussion our agreement or authorisation by the LPA or allowing any form of scrutiny by members of Exeter City Council of the final draft of the proposed Local Plan.

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)

We would suggest that an additional point is added stating – **proposals will not create an over concentration of the proposed use in any one area of the city which would change the character of the neighbourhood or create an imbalance and impact the sustainability of the community.**

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)

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)

Whilst mentioned in distinct areas of the proposed Local Plan the changing demographics of Exeter and its recent growth in population largely related to the University of Exeter i.e. PBSA's, HMO's and Co-Living the proposed Local Plan fails to address the issues relating to community imbalance in regard to settled communities within Exeter or the sustainability of the neighbourhood.

Regarding HMO's the LPA has recently updated it policies following representations from residents from parts of the city that had not previously encountered HMO applications. The main argument used to justify the application of an Article 4 Directive in both 2014 and 2024 was that of maintaining community balance based on a 20% figure leading to an imbalance within a given postal code area. It therefore seems perverse that whilst clarifying the definition of community imbalance within Article 4 references to community balance has been removed from the proposed new Local Plan. No such determination to remove the former 5Hb was discussed or agreed by the elected members of the authority.

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)

This request relates to omissions without discussion or debate hence the request at Q4 c that amended wording of the former H5b be reinserted within the Local Plan. Whilst the proposed Plan is largely linked to new developments on brown field sites that are intended to support much of Exeter's future growth, the current policies at H5b relate to the city as is, its existing communities and neighbourhood and sought to provide a protective planning framework.

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)

☒

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 ward councillors for an inner city ward which hosts the main university campus and representing the only part of Exeter with a Neighbourhood Plan -Exeter St James Neighbourhood Plan – March 2013, which post-dates the current Exeter Local Plan we have worked with numerous residents groups over many years to ensure that the planning concepts related to the former 5Hb and which are embedded in the Neighbourhood Plan are given carefully consideration during the planning determination process in order to maintain balance and sustainable local communities. The omission of this policy from the proposed Local Plan without debate, discussion or scrutiny by the local authority we believe seriously undermines the existing St James Neighbourhood Plan and threatens community balance across the city due to the changing population demographics. As recently as the 24th October 2024 a Planning Inspector at Appeal used this policy reference in order to dismiss a planning appeal ref APP/Y1110/W/24/3344914 – 70 Pennsylvania Road Exeter EX46DF. Para 23.

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>