

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

c/o agent

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

2. Agent's details if applicable

Title

Ms

First Name

Sally

Last Name

Miles

Job Title (where relevant)

Director

Organisation (where relevant)

Firstplan Limited

Address Line 1

Broadwall House

Line 2

21 Broadwall

Line 3

London

Line 4

Post Code

SE1 9PL

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)

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

Yes

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No

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☐

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)

Please refer to enclosed letter submitted on behalf of our client Costco Wholesale UK Limited.

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.

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

Yes

☐

No

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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.
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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.
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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)

X

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

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Our Ref: SM/AB/22477
Your Ref: n/a
Email: [REDACTED]

Broadwall House
21 Broadwall
London SE1 9PL

[REDACTED]
[REDACTED]
firstplan.co.uk

04 February 2025

Exeter City Council
Planning Policy
Civic Centre, Paris Street
Exeter EX1 1JN

Sent via email to planning.policy@exeter.gov.uk

Dear Planning Policy Team

PUBLICATION DRAFT EXETER LOCAL PLAN (WINTER 2024/25) – REPRESENTATIONS ON BEHALF OF COSTCO WHOLESALE UK LIMITED ('COSTCO')

Dear Planning Policy Team,

This representation is submitted by Firstplan on behalf of **Costco Wholesale UK Limited ('Costco')**, who operate a number of wholesale membership clubs throughout the country, which are typically located on employment / industrial land.

On behalf of our client, we have submitted representations to two previous consultations which have been published by the City Council in respect of the new Exeter Local Plan, namely the 'Draft Outline Consultation 2022' (representations submitted December 2022) and the Reg.18 'Full Draft Consultation 2023' (representations submitted January 2024). We now welcome the opportunity to submit representations to the Regulation 19 draft of the Plan.

Summary of previous representations to the Exeter Local Plan

Our previous representations set out a detailed background to Costco's business operations, and confirm how the Use Class order confirm that warehouse clubs are a 'sui generis' use, rather than class E retail use, and accordingly it has been found that it is acceptable for a Council to grant planning permission for new Costco warehouses on employment land, in circumstances where many retail consents may not have been forthcoming. Costco has secured 29 consents and has been consistently considered to comprise a sui generis (hybrid use) which is appropriate on employment land. This has been confirmed through the granting of planning permission in recent years for new warehouses in Wembley (on allocated Strategic Industrial Land), Hounslow, Sunbury and Stevenage. Costco have also recently secured planning permission for a new Warehouse on an ex-industrial site in Gloucester.

Costco are currently seeking to expand their presence in the UK market, and, as our previous representations have identified, **the company are considering opportunities in the Exeter area.**

Our previous representations also set out the economic benefits which a Costco warehouse can bring to a local area, through job creation across a range of specialisms and levels of experience and technical expertise. Typically, a Costco Warehouse will deliver approximately 180 new employment positions at opening, and this rises to 250 or more within three years of opening. Pay sales compare favourably with those in the retail and warehousing / industrial sectors.

Our previous representations have also identified the benefits to local economies which can arise through the opening of a Costco warehouse. Costco's primary target customer is small and medium-sized businesses such as independent retailers, food and drink outlets, service outlets, and independently owned hotels and leisure businesses. Each of these sectors make an active and important contribution to the town, district and local centres within which they operate, and, by allowing them to purchase more affordable products, enables them to be more price competitive, whilst also in turn benefiting local economies and residents' access to affordable goods. In this context, it is clear that Costco can make a significant contribution to the health of local economies.

Compliance with aims and objectives of the National Planning Policy Framework (NPPF)

As the Council will be aware, the National Planning Policy Framework (NPPF) identifies the importance of developing a strong and competitive economy. This emphasis is carried forward, and indeed emboldened, in the latest version of the NPPF which was published in December 2024.

Paragraph 85 in Section 6 of the NPPF (2024), Building a Strong, Competitive Economy' continues to state that:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.' (para 85, our emphasis underlined).

Paragraph 86 of the NPPF (2024) states that planning policies should, inter alia,

- 'Set out a clear economic vision and strategy which positively encourages sustainable growth';
- 'Set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period'; and
- 'be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.'

This latter strand of paragraph 86 of the NPPF is considered of particular relevance to our client's operation. It confirms that local planning authorities should not seek to be overly prescriptive in their allocations, and local plans should offer sufficient flexibility to accommodate needs which have not been explicitly identified in the Plan. As our previous representations have set out, markets and economies in local areas can always be expected to evolve, and not all new businesses can be expected to fit within traditional use class definitions. Accordingly, ensuring that local plans have an inherent level of flexibility is considered to be of significance, and indeed is necessary to ensure compliance with the aims and objectives of the NPPF. Our previous representations have set out that we do not believe the current wording of the Council's new Local Plan to offer sufficient flexibility in terms of the range of economic sectors it seeks to support.

Representations

In common with previously submitted comments, our representations relate to draft Local Plan **Policy EJ2 'Retention of Employment Land'** and **Policy EJ3 'New Forms of Employment Provision'**. We also take this opportunity to provide comments on the proposed changes to the wording of **Policy EJ1 'Economic Growth'**. Details of our comments in respect of these policies are set out below.

Policy EJ2 'Retention of Employment Land'

Whilst we welcome that there have been some changes to the wording of Policy EJ2 relative to the previous consultation, we consider further changes should be made. We maintain our view that, in order to better reflect the aims and objectives of the NPPF, the Local Plan should adopt a more flexible approach to the future use of its existing employment sites. In

our previous representations, we requested that the policy wording was amended to make reference to ‘employment generating uses’, and we continue to hold the view that this represents the most appropriate approach for the policy to follow.

Reg.18 draft consultation wording:

‘The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use may be considered acceptable where land is allocated for redevelopment or where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040.’

Reg.19 draft consultation wording:

‘The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use may be considered acceptable where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future’

Requested changes to policy wording in Reg.19 version: (note: requested changes shown in red text)

*‘The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained **for employment-generating uses**. Elsewhere, the loss of employment land to an alternative use **will** be considered acceptable where:*

- (i) the site is allocated for ~~mixed-use~~ redevelopment, or*
- (ii) where regeneration would make more efficient use of the land and **would provide alternative employment-generating opportunities**, ~~would not result in any loss of employment floorspace~~, or*
- (iii) where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future’*

Policy EJ3 ‘New Forms of Employment Provision’

In both of our previous representations, we requested the Council should reconsider the wording of this policy, as there is an inference that the only ‘new forms of employment provision’ which the Council will support are the three listed in the policy wording, i.e. work hubs, collaborative workspace, and live-work schemes.

We note that there has been no change to this proposed policy approach in the Reg.19 Local Plan, although we note that there is now additional text inserted into Policy EJ1 which takes a more general policy approach in respect of how the Council will consider application for new employment development or employment-generating uses, which is welcomed. Nevertheless, Policy EJ3 could infer that the Council will not support applications which fall outside the sectors listed in the policy wording. It is considered that policy wording could dissuade securing potential investment into Exeter from wider sectors, which could in turn have the consequence of undermining the economic success of the city. There are many other forms of employment generating uses which can add value and enhance the economic profile of Exeter which fall outside these sectors. It is not appropriate to imply all large scale schemes have to incorporate these specific employment uses.

We therefore repeat our request for the approach set out in Policy EJ3 to be more accommodating in its support of other economic sectors in addition to the knowledge economy sectors which the policy seeks to prioritise. It is also considered that the requirement for all new strategic brownfield proposals to include these 'new forms of employment provision' to be unreasonable, as there may be situations where such uses are not compatible with the wider type of development being proposed.

Reg.18 draft consultation wording:

'To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment provision will be supported:

- *Work hubs*
- *Collaborative workspace*
- *Live-work units*

Large-scale developments will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'

Reg.19 draft consultation wording:

'To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment development will be supported:

- *Work hubs;*
- *Collaborative workspace; and*
- *Appropriate live-work schemes.*

Strategic brownfield development proposals will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'

Requested changes to policy wording in Reg.19 version:

'The Council will promote economic growth by considering applications for new employment-generating uses on their individual merits. To promote sustainable growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment development will in particular be supported:

- *Work hubs;*
- *Collaborative workspace; and*
- *Appropriate live-work schemes.'*

~~*Strategic brownfield development proposals will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'*~~

Proposed Changes to Policy EJ1 'Economic Growth'

Finally, we note that the Reg.19 consultation proposes a number of significant changes to Policy EJ1 relative to the Reg.18 version, as set out below.

Reg.18 draft consultation wording:

'The City Council is committed to supporting Exeter in becoming one of the UK's leading knowledge economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics;*
- Environmental futures;*
- Health innovation;*
- Digital innovation;*
- Creative industries; and*
- Other emerging transformational sectors.*

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training to encourage and support growth in the transformational sectors.'

Reg.19 draft consultation wording:

'Development proposals will be supported where they meet the economic needs of the city as identified in the Economic Development Needs Assessment.

The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge and clean growth economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics;*
- Environmental futures;*
- Health innovation;*
- Digital innovation;*
- Green economy;*
- Creative industries; and*
- Other emerging transformational sectors.'*

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth in the transformational sectors.'

The insertion of the additional paragraph at the start of this policy, which states that development proposals will be supported where they meet the economic needs of the city, is welcomed as a step in the right direction in terms of the Council acknowledging the contribution which other types of economic development can generate. However, reflecting the thrust of our comments above, it is considered that by linking the policy wording to the findings of the council's Economic Development Needs Assessment, the policy wording is potentially not providing general support in principle for proposals which will deliver economic benefit to the city which may not be captured by this study.

By amending the wording of the policy to reflect the suggestions below, it is also considered that it will bring the policy wording in line with the supporting text to the policy, which acknowledges (para 7.10) that '*In supporting economic growth, the City Council aims to ensure that all the city's citizens gain from the prosperity and wellbeing generated by the local economy*' (our emphasis).

Accordingly, it is requested that the wording of draft Policy EJ1 is revised to state:

*'Development proposals will be supported where they **make a positive contribution to employment generation and meeting** the economic needs of the city ~~as identified in the Economic Development Needs Assessment~~*

*The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge and clean growth economies. To help deliver this, appropriate development proposals for the following transformational sectors will **in particular** be supported:*

- Data analytics;
- Environmental futures;
- Health innovation;
- Digital innovation;
- Green economy;
- Creative industries; and
- Other emerging transformational sectors.

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth in the transformational sectors.'

Conclusions

I trust the above comments will be considered as the Council move towards the final stages of preparation of their new Local Plan. I would be grateful if I could continue to be kept informed about any future consultations and publications in this respect. Should you have any queries regarding the contents of this letter, please contact me.

Yours sincerely



SALLY MILES
Director

CC. James Cheesemore, Costco Wholesale UK Limited
Kate Merson, Costco Wholesale UK Limited