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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)

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)

Preamble 6.12 includes support for residential gardens as housing development along with windfall sites.... 'subject to consideration of all relevant policies in the development plan (para 6.12).' The inclusion of gardens as sites for developments is not an effective or justified policy and acts against policy H16, climate change and NE3:

- the policy and its parameters are not defined in the subsequent policy H2;
- the current density of most parts of Exeter already are such that development in gardens risks creating problems such as, but not limited to, overlooking and therefore contradicts policy H16 in regard to "the ability to feel at ease in home or garden." The ONS also highlight the high current density in Exeter "In 2021, Exeter was home to around 19.8 people per football pitch-sized piece of land, compared with 17.9 in 2011. This area was among the top 25% most densely populated English local authority areas at the last census¹"
- General Permitted Development Orders already allow for the permission to carry out extensions, rear dormers, erect fences, porches, outbuildings, satellite dishes, demolition etc. and more for residential, commercial properties and land across the country.
- There is an oversupply of numbers in the housing supply figures therefore development in gardens is not required to ensure supply.
- If the proposed development is a dwelling that will be used as an HMO, then issues of management and density and impact on amenity will increase (we have had such cases in Exeter in relation to proposed student properties).
- Domestic gardens have been estimated to make up 30% of the urban area in England. While not all land covered by domestic gardens will be green (paved areas and buildings etc), domestic gardens are valuable for wildlife, because of the concentration and variety of plants they can contain, as well as providing habitats such as ponds, and connecting larger patches of urban green space and acting as natural SUDS. Gardens² have a valuable role in:
 - removing air pollution and mitigating noise
 - restorative effects on wellbeing through recreation in nature
 - supporting biodiversity
 - absorbing and storing carbon
 - reducing urban heat island effects and increasing thermal comfort
 - reducing flood risk by reducing runoff and providing space for water away from homes, businesses and infrastructure
 - sustainable urban drainage and reduction of flood risk.

¹ [How life has changed in Exeter: Census 2021](#)

² [The state of the environment: the urban environment](#)

The policy is therefore contrary to the Plans policies on climate Change and biodiversity NE3

The Plan cites the national garden city principles (4.15) - which includes:

“Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.”

Promoting such a principle has to be predicated on protecting the gardens we have!

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)

Remove reference to development in domestic gardens in 6.12 and add in Policy H2:

Development in domestic gardens will not be supported.

For the reasons cited above in 5b

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 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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