

Appendix 11:

Full Name

Matthew Dickins

Organisation (where relevant)

East Devon District Council

Chapter of the Exeter Plan

Chapter 7 - Economy and jobs

1. To which part of this chapter does this representation relate? (Representations must be made on a specific policy or paragraph within the section and this should be specified in the below).

Paragraph 7.3 onward and associated policies

2. Do you consider that this part of the chapter is legally compliant?

-

2.a. If yes, and you wish to support the legal compliance of this part of the chapter, please use this box to set out your comments.

-

2.b. If no, please give details of why you consider this part of the chapter is not legally compliant. Please be as precise as possible.

-

2.c. Please set out the modification(s) you consider necessary to make this part of the chapter legally compliant, in respect of any legal compliance matters you have identified at 2.b above. You will need to say why each modification will make this part of the chapter

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.

-

3. Do you consider that this part of the chapter is sound?

No

3.a. If yes, and you wish to support the soundness of this part of the chapter, please use this box to set out your comments.

-

3.b. If no, please give details of why you consider this part of the chapter is unsound. Please be as precise as possible.

Employment Land Provision

East Devon District Council object to chapter 7, Economy and Jobs, of the Exeter local plan as it fails to allocate or otherwise make sufficient land available to accommodate future employment needs of the city. The City Council should respond to the evidence set out in the Greater Exeter Economic Development Needs Assessment - Microsoft Word - Greater Exeter EDNA HJA Final Report v2.1.docx (on the City Council website) and plan to meet quantified employment land needs, in the city, as set out in Appendix 2 of this report - a mid-point on the Clean Growth need scenario being an appropriate level to plan for.

From assessment of available data, noting full quantified data on all sources of supply is not specifically summarised, the Exeter Plan falls (appears to fall) a significant way short of meeting city needs. The proposed regeneration opportunity area also has significant potential to lead to a net loss of employment spaces in this part of the city. Whilst noting that the plan does reference a collective across local authority balance (in the Exeter Functional Economic Market Area) between employment land need and supply it is not considered that such an approach to need/provision is an appropriate means to plan for defined city generated needs.

The approach adopted by the City Council, in not planning to meet city needs, generates the following failings:

- a) The plan will not be meeting the needs of the city.**
- b) Lack of provision will undermine the economic growth potential of the city and the stimulus it provides for the wider area. Failure to provide undermines future economic success.**
- c) Failure to make sufficient provision will lead to pressure to accommodate city**

generated growth to locations outside of the city boundary. Amongst other matters this will lead to greater outward commuting and pressure on transport infrastructure.

The City Councils approach appears to rely on employment land provision outside of the city boundary but within the wider Functional Economic Market Area in order to meet the economic needs of the area. However, no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land needs identified by the EDNA. The land identified in the emerging East Devon Local Plan 2020 – 2042 is considered to be necessary to meet the needs of East Devon and does not seek to address wider needs.

3.c. Please set out the modification(s) you consider necessary to make this part of the chapter sound, in respect of any soundness matters you have identified at 3.b above. You will need to say why each modification will make this part of the chapter 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.

To overcome and address the concerns raised by East Devon District Council the Exeter Plan should explicitly quantify, citing appropriate evidence, city employment land needs and also all sources of supply, specifically including land allocations in the plan. Any shortfalls in land provision arising between this supply and need assessment should be addressed through additional provision, specifically land allocations for development, in the Exeter plan. This would draw the plan into alignment with tests set out in national planning policy.

To achieve the outcome the city council may need to identify additional land to allocate, review or amend allocations of land for other uses or in other ways adjust plan policy. It is appreciated that this may involve some challenging decisions, for example in respect of building on green fields sites. It is noted, however, that there are not the national landscape designations in the city that fall on land outside of city boundaries.

4. Do you consider that this part of the chapter complies with the Duty to Co-operate?

-

4.a. If yes, and you wish to support this part of the chapter's compliance with the duty to co-operate, please use this box to set out your comments.

-

4.b. If no, please give details of why you consider this part of the chapter fails to comply with the duty to co-operate. Please be as precise as possible.

-

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide scope to expand on and clarify any matters arising - if needed.