

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)

The NPPF (2023) paras 157 to 175 stress the need for a dual approach: *to mitigate climate change and to ensure resilience and adaptation in dealing with its impacts*. In the NPPF's chapter on climate change, the introductory paragraphs 157, 158, and 159 place emphasis on **all three** aspects of this approach.

The draft Exeter Plan, in the Objective and Introduction to its Climate Change Chapter 5, rightly sets out an aim to mitigate and adapt to climate change, and we welcome this aim. In our view, however, paras 5.1 and 5.2 are unsound in that they focus primarily on reaching net-zero as the main way of tackling climate change, and so the paragraphs are not fully compliant with the NPPF.

Para 5.1 talks only of net-zero. Para 5.2 also leads by mentioning net-zero, with adaptation mentioned only peripherally and resilience not at all. We agree that reaching net-zero is fundamentally important, but in setting the scene for this important Chapter, there should be more significant, direct reference to resilience and adaptation, for instance highlighting the fundamental role of both Green Infrastructure and Design in this respect. Plan making and development management have a responsibility to moderate and deal with the impact of climate change – a change defined for instance in the UK Climate Impacts Programme (www.ukcip.org.uk).

The draft acknowledges that key Climate Policies are presented in other Chapters of the Plan, but refers only to the Chapters on transport and heritage assets, without recognising that the cross-cutting nature of climate change has consequences for policies on Homes, the Natural Environment, Design, Health and Wellbeing, and Infrastructure and Facilities. (Please note that we make additional representations on the soundness of those Chapters.)

(Incidentally, the draft Plan wrongly labels Chapter 9 Sustainable Transport and Communication as being Chapter 8, and Chapter 11 History and Heritage, as being Chapter 10.)

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)

In order to fully reflect the NPPF's dual approach to tackling the challenge of climate change, additional wording is needed in the Introduction to the draft Local Plan Chapter on Climate Change. This wording should highlight the responsibility of Plan Making and Development Management for moderating and dealing with the impact of climate change, for instance increased summer temperatures, the increased likelihood of storms, high winds and other extreme weather, the change in rainfall leading to both drought and flooding, the loss of biodiversity, the danger to soil health, and so on. Paragraphs 157 to 159 of the NPPF and ECC Evidence report "*Delivering Policy CC7: Development that is adaptive and resilient to climate change* Centre for Energy and the Environment Internal Document 1070 November 2024"¹ provide relevant introductory wording.

For example:

"By 2070 Devon's average climate is expected to see a 2.66°C increase in temperature, a decrease in rainfall by 0.16mm/day, a decrease in cloudiness by 17.06 watts/m² and decrease in windiness by 0.15m/sec. Summer temperatures are expected to increase by 3.28°C whilst rainfall decreases by 0.77mm/ day.

¹ [idohgynwh2kw9gscodgn.pdf](https://www.exeter.gov.uk/media/1070/1070-internal-document-1070-november-2024.pdf)

These changes mean an increased risk of overheating, reduced indoor and outdoor air quality, reduced water availability and increased occurrence of drought. Winter temperatures are predicted to increase by 1.90 degrees whilst rainfall increases by 0.37 mm/day, increasing flood risk, particularly in urban areas.

New buildings must be adapted to the shifting climatic conditions to prolong the longevity of the building and protect its occupants. The CCC reports that it is vastly more cost effective for developments to be adapted to the effects of climate change at the new build stage than to retrofit buildings later."

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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