

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

MR

First Name

J

Last Name

Digby

Job Title (where relevant)

Organisation (where relevant)

Blocwork

Address Line 1

Line 2

Line 3

Line 4

Post Code

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

S2, H4, SBA3

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)

Please see attached representations.

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)

Please see attached representations.

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)

Our client requests to be notified of relevant updates in respect of the emerging Local Plan. We also request the right to be heard at the subsequent Examination in public to ensure the relevant policies are found sound having regard to the NPPF.

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>



06 February 2025

Planning Policy Team
Exeter City Council
Civic Centre
Paris Street
Exeter

By Email Only

Dear Sir or Madam

Exeter Plan: Publication Draft (Regulation 19)

Introduction

This submission has been prepared in response to the Publication Draft Exeter Local Plan which is subject to public consultation as part of preparing a new Development Plan. The response is prepared on behalf of our client, Blocwork, which comprises Network Rail's joint venture with the bloc Group.

The submission focuses on the enhancement of St Davids Station and its surroundings, which falls within the area known as Red Cow Village (policy ref. SBA3) which comprises one of the allocated strategic brownfield sites identified in the Local Plan.

Blocwork control a proportion of the land within the wider Red Cow Village area and are supportive of the proposed allocation of the land in their control. They are exploring plans to redevelop this area for a residential led mixed use development and will hopefully come forward with more detailed plan within 2025.

Blocwork welcomes and supports the continuing progress made by the Council in preparing a new Local Plan for Exeter and hopes the comments contained within these representations are helpful in progressing it to adoption.

These representations have been prepared having regard to the requirements of paragraph 36 of the National Planning Policy Framework (NPPF) which requires plans to be 'sound' in terms of being positively prepared, justified, effective and consistent with national planning policy.

These representations should be read alongside those previously submitted by Bloc to the Full Draft Exeter Local Plan in December 2023.

Background

Blocwork's land interests is outlined on the attached site plan.

The land is already identified within the adopted Local Plan (First Review 1995-2011) as part of site KP5 allocated for a mix of offices, housing and a local centre. The aspiration for redevelopment has continued to be brought forward through first the Liveable Exeter Vision (Spring 2019) and more recently as part of the Outline Draft Plan Consultation (Regulation 18) in September 2022 and Full Draft Plan Consultation (Regulation 18) in October 2023.

The emerging Red Cow allocation is identified to deliver approximately 440 dwellings over the next 20 years alongside new employment floor space, retail and commercial units, public realm and station facilities.

Blocwork are committed to enhancing the existing Exeter St Davids station area and redeveloping the surrounding land within its control to deliver a residential led mixed use development in a highly sustainable city centre location. The vision is to continue to evolve Exeter St Davids as a vibrant multi-use quarter, to meet current and future needs of Exeter and the surrounding area. Blocwork will seek to reinvigorate its assets by repurposing and enhancing its estate

and maximising development opportunities. Blocworks's placemaking ambition is to enhance the public realm to address the existing vehicle dominated station forecourt which is subject to congestion. The area would become a high-quality neighbourhood with a diversified land use offering including new homes, employment floor space and commercial offering. The vision also includes delivering enhancements to station facilities such as improved parking arrangements, cycle storage and bus facilities.

Blocwork would welcome the opportunity to take this work forward in collaboration with the Council and other key stakeholders.

Blocworks's representation to the draft Local Plan are made in this context and are set out below in the following sections.

Visions, Aims and Objectives of the Plan

Blocwork welcome and share the aims and objectives of the draft Plan. Blocwork are committed to developing projects that involve creating lasting, liveable places which aligns with the Plans overall vision.

A core objective of the Plan and the Exeter Vision 2040 is to support residents to have homes that are secure, affordable and healthy. Blocwork supports this ambition which represents an important step in the right direction, but this must be matched by a robust approach ensuring that development will be viable and hence delivered. The delivery of much needed new homes will need to be balanced alongside other land uses including commercial and community facilities to ensure sustainable growth for all.

The Plan also seeks to actively respond to the climate and ecological emergencies in securing sustainable development and seeks to make efficient use of under-used land which includes transforming some areas of the city to create communities with new homes, workplaces and public open spaces. These aims are wholly supported by Blocwork.

Policy S2 Liveable Exeter Principles (Strategic Policy)

Draft policy S2 outlines a series of development principles which will apply to the strategic mixed use brownfield development sites identified in the Exeter Plan and other major sites that may come forward in the future. The supporting text states that these principles are a vital element in steering development and go hand in hand with the spatial strategy of delivering quality development of brownfield land.

Principle 1 Memorable Places includes a requirement for development to "respond positively to local topography, open spaces and waterways and maximise views to Exeter's natural and built landmarks and features".

Blocwork supports the principle of high-quality placemaking and ensuring new development contributes positively to Exeter's character however suggest the wording of the policy is amended to prevent constraining the opportunity for well-designed high-density development.

It is acknowledged that new development should make a positive contribution to long, mid-range and immediate views to and from it and therefore we suggest the following policy wording remove the words 'Maximise Views' in order to support high density mixed used development. As such we suggest the following amended wording:

*"Respond positively to local topography, open space and waterways and **take account of key** views to Exeter's natural and built landmarks and features"*

Defining key views and landmarks within policy documents, such as Conservation Area Appraisals and Management Plans would ensure transparency and help guide development.

Principles 2 and 4 include references to the terms "exciting" and "beautiful." While these aspirations are valuable in shaping high-quality development, they open to varying interpretations. To ensure clarity and consistency in policy implementation, we suggest using more defined language that aligns with established design principles. Notably, the term "beautiful" has also been removed from the National Planning Policy Framework (NPPF), highlighting the

importance of using objective criteria in policy wording. We would therefore suggest deletion of these words to ensure this policy is effective and consistent with national policy as required by paragraph 36 of the NPPF.

Principle 4 Liveable buildings has a requirement for providing homes that are predominately dual aspect.

East, west and south facing single aspect units can work very well, especially in taller buildings, and it is a very narrow measure of a unit's residential quality to judge it solely on aspect. The supporting Local Housing Need Assessment identifies a modest housing need for 1-bedroom dwellings. It is unclear how all one bedroom units could avoid being single aspect within a development. A balanced policy that prioritises dual aspect where feasible while allowing flexibility for well-designed single-aspect homes would support both housing delivery and design quality.

In order to provide a more balanced policy we would recommend the policy wording to be amended to reflect this: **"Provide homes that maximise the provision of dual aspect homes and normally avoid the provision of single aspect dwellings. A single aspect dwelling can be provided where it is considered a more appropriate design solution in meeting the requirement of optimising density, than a dual aspect dwelling, and it can be demonstrated that such a dwelling would have adequate ventilation and daylight"**.

Policy H4 – Affordable Housing

Policy H4 should allow for a flexible site-specific approach when it comes to affordable housing provision across the city. We believe this would be better than setting a default threshold as it ensures the policy remains deliverable to and responsive to local needs.

Recognising that viability varies across different locations within Exeter and development typologies, affordable housing thresholds should be informed by what can be achieved in that area, taking into account of viability, deliverability, local needs and other requirements, consistent with paragraph 35 of the NPPF.

A more localised approach to affordable housing thresholds should be considered further to the greenfield and brownfield threshold approach outlined. A localised approach would mean that affordable housing delivery could vary from site to site with provision sometimes lower than the overall policy target, taking account of the impact of other non-residential uses (health centre, education uses, social and community uses, work space) on the ability to reach the levels of affordable housing that would be possible on similar sites if they were purely residential.

Policy SBA3 – Strategic Mixed Use Brownfield Allocation – Red Cow

Draft Policy SBA3 provides the supporting policy requirements for the strategic mixed use brownfield allocation at Red Cow. Blocworks's land interest relates to part of the land identified under this allocation.

Blocwork support the principle of the proposed development allocation at Red Cow on land within its control and its regeneration potential. To ensure the site's successful delivery, greater clarity is required regarding the policy requirements and expectations for contributions. A more defined approach for this policy would help support viability and ensure the allocation remains deliverable. As such, Blocwork require certain policy changes as outlined below.

The introduction for the Red Cow allocation reads as follows:

"Red Cow is identified for a residential led mixed use development delivering approximately 442 homes, retaining existing levels of employment floorspace, and delivering an impressive and memorable city gateway that creates a sense of arrival into Exeter as well as meeting St David's railway station's operational needs. The development must support the achievement of net zero and accord with the Liveable Exeter Principles, incorporating the highest standards of design and delivering a place people will visit, stay, work and live."

The requirement to "retaining existing levels of employment floor space" should be clarified further within the policy. The requirement is not sufficiently clear as to how much new workspace would be expected in any development, for example what uses constitutes employment floor space and when is the measure of existing levels taken from.

The requirement to retaining existing employment floorspace levels should be reconsidered. Instead, the policy should make reference to the types of commercial uses which are to be supported in this location with the precise

quantum, type and mix informed by market conditions at the time which the allocation is brought forward. This would serve to create a flexible planning policy framework that supports the successful regeneration of the area and is capable of responding to future change.

The language used within the policy may lead to uncertainty in policy interpretation with words such as “Impressive” and “memorable” being subjective. To ensure more clarity and consistency policies should be more precisely worded in line with The NPPF (16), so it is evident how a decision maker should react to development proposals. Plans and policies are required to be consistent with national policy in order to be found sound having regard to paragraph 36 of the NPPF.

Requirement A (ii) seeks provision of “serviced plots for custom and self-build homes”. However, the suitability of such homes on a strategic brownfield regeneration site is uncertain. It is vital to make the best use of brownfield land in the city by optimising density to support significant increase in new homes. Given the nature of this allocation, it is questioned whether self-build and custom plots would be practical and or attractive to potential self-build /custom builders. As such, Blocwork recommends reconsidering this element of the allocation to ensure the most effective use of land.

Furthermore, the practicalities of delivering self-build homes on a major urban regeneration project from a construction perspective may present challenges. Smaller sites are much better placed to meet the demand for self-build development, which is likely to be for bespoke units in rural or semi-rural locations, rather than serviced plots within a large-scale regeneration development.

Exeter St David’s is a strategic transport hub serving not only the local area but also the wider hinterland. Development of the Red Cow allocation will need to meet St David’s railway station’s operational needs including the provision of car parking as referenced in the supporting policy text at paragraph 16.22.

At present a large amount of space is given over to surface car parking which results in an unattractive arrival space plus an inefficient use of land in a highly sustainable and accessible location. An opportunity therefore presents itself to deliver a new multi-storey car park (MSCP) as part of the redevelopment of Red Cow to address these issues. Delivery of a MSCP is necessary in order to free up land for redevelopment and allowing the most potential for the rest of the site to deliver high quality placemaking and in accommodating new built form including new homes.

Criteria D outlines the proposed transport infrastructure requirement for Red Cow. This should be amended to include a specific requirement as follows **“the development to meet the railway station’s operational needs including the provision of car parking in the form of new multi-storey car park”**.

The Red Cow allocation and the other strategic mixed use brownfield allocations are closely aligned with the need for infrastructure, services and new uses in order to unlock the potential and to realise the density and optimised delivery sought. Where this is the case, the Plan will need to carefully balance priorities to ensure development is not overburdened with competing demands. It is therefore essential for planning policies to proactively facilitate development and remove, rather than add to, the barriers for their timely delivery.

Paragraph 35 of the NPPF sets out that “plans should set out the contributions expected from development” including the levels of such obligations and that such policies should not undermine the deliverability of the Plan.

The Red Cow allocation includes a number of opened ended policy requirement such as C (iii), (iv), D (iii), (iv), E(i) and G (ii) which seeks delivery of unspecified infrastructure and contributions which could serve to add to the burdens that are already faced in bringing forward development on complex brownfield sites. Providing more defined expectations would help ensure that development remains viable and deliverable, enabling the provision of much needed homes. As drafted Blocwork consider these aspects of Policy to be unsound and recommends refining these to align with paragraph 36 of the NPPF, ensuring they are clear and consistent with national policy.

Blocwork support the Council's intent that new development includes infrastructure provision needed to mitigate its impacts. However, each new development which comes forward needs to be assessed individually, having regard to any cumulative impacts, to determine the appropriate mitigation requirements in light of the tests of Regulation 122.

Policies should be structures to support rather than hinder development ensuring requirements both individually or cumulatively, do not create barriers to delivery and ensure requests for obligations or contributions are justified and proportionate at the planning application stage. The issues of deliverability and viability are key, given the acute housing and development pressures in Exeter and the urgent need to address these on previously developed land. Such sites face complex and unique challenges when being redeveloped.

As such, it is our view that the policy wording would benefit from modifications to ensure that it is streamlined and fully focused on delivering its growth objectives and does not hold back development. The policy wording should be amended to remove the positive presumption that new development will include unspecified infrastructure and contributions and should instead clearly identify what obligations are excepted from development and at what levels based on appropriate evidence. The policy should then set out how such requirements will be prioritised including in respect of affordable housing requirements.

Amending the policy in such a manner would allow for the relevant package of mitigation measures to be determined on a case-by-case basis having regard to the tests of Regulation 122 and ensure the policy will be justified and effective as required by paragraph 36 of the NPPF.

Requirement F requires *"an energy strategy that minimise carbon emissions (both operational and embodies incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks"*.

Blocwork support the move toward decarbonisation however it should be noted that energy networks present challenges in terms of delivery, resilience and development viability. Requirement F should be amended to state *"an energy strategy that minimise carbon emissions (both operational and embodied) incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy networks **where feasible and viable**"*. The proposed policy wording amendments would align with draft policy CC3 which includes caveats for when connecting to a local energy network may not be appropriate or possible.

Requirement G (ii) requires *"a built form that enhances the character and appearance of St David's Conservation Area and retains sight lines of locally listed St David's station"*.

Requirement G (ii) is not clear in terms of what sight lines are required to be retained. Guidance on important views or sight lines is requested along with the evidence which supports this which should be made available for consultation.

In summary, Blocwork are supportive of the proposed Red Cow allocation and the ambition set for the site within the Plan to deliver homes, commercial floorspace and to support the station's operational requirements. However, to ensure the successful regeneration of the site it is important that policy requirements are clear, well defined and balanced. The cumulative impact of broad or unspecified obligations and requirements could pose challenges in terms of design feasibility and commercial viability. Refining these requirements will help unlock the sites full potential and ensure that development remains deliverable and sustainable.

Summary

On the whole, Blocwork is supportive of the direction of the draft Plan. However, it is important that the emerging policy requirements do not constrain growth and looks to support development of the strategic mixed use allocations subject of regeneration ambitions in particular.

I trust careful consideration will be given to these representations.



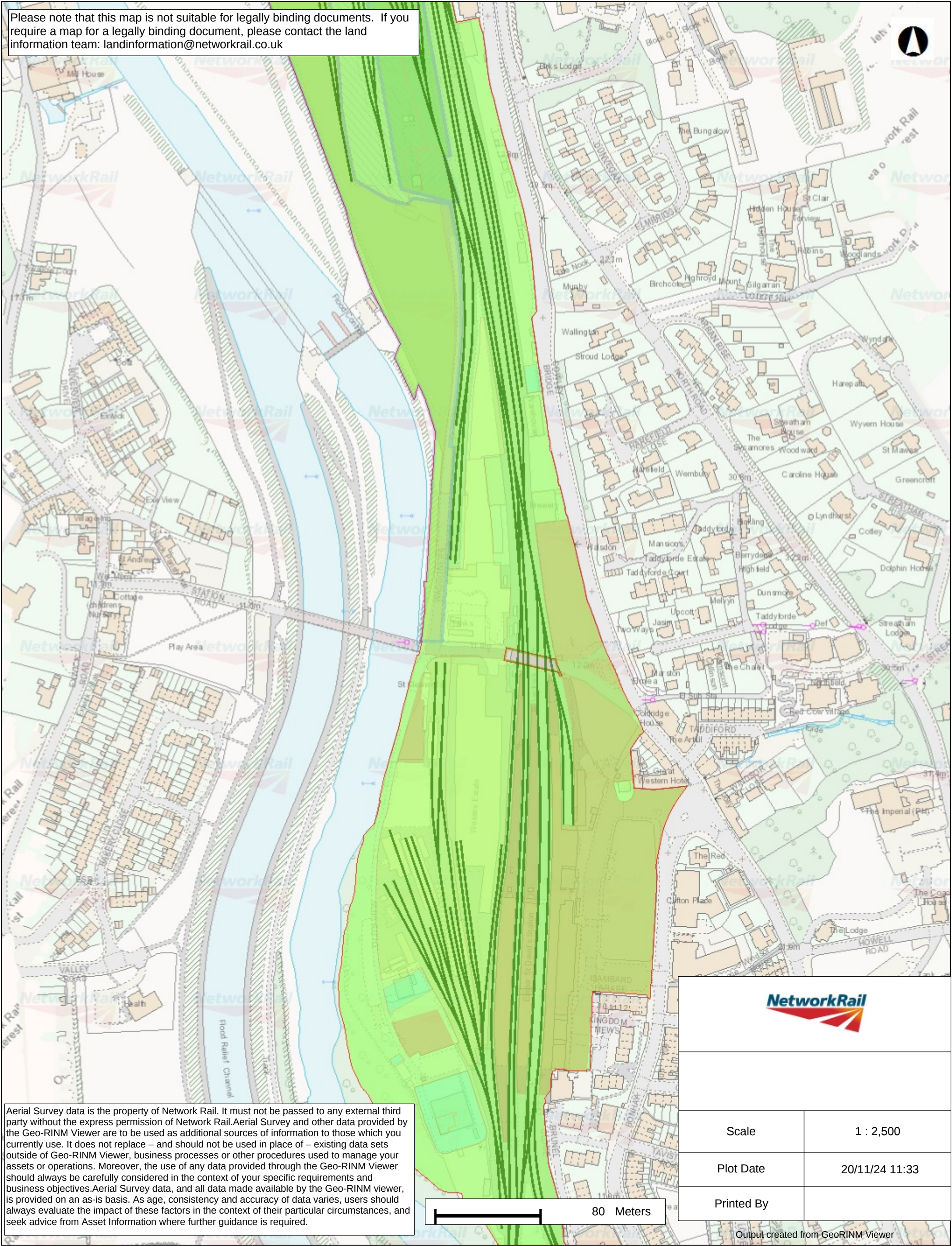
If you have any queries, please do not hesitate to contact Chris Dadds [REDACTED] or Alex Cave [REDACTED] in the first instance.

Yours faithfully

[REDACTED]

JLL

Please note that this map is not suitable for legally binding documents. If you require a map for a legally binding document, please contact the land information team: landinformation@networkrail.co.uk



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Plot Date	20/11/24 11:33
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