

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

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

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)

- Delivering a net increase in new jobs to support economic prosperity and local employment is an essential component of the plan (which is supported). The city of Exeter plays a critical role as a centre in this part of Devon, and this should be reflected in the role and ambition of the City to drive economic growth (and associated plan policies).
- It is concerning that the plan does not state with any clarity or precision the levels of job growth being targeted and the quantum of new employment land and development that is required (with reference to acknowledged need which is shown by evidence base for the plan, including the Greater Exeter EDNA).
- The plan fails to provide for, via safeguarding and/or allocations, sufficient land to meet economic development needs in the City. The strategy for the plan being based on regeneration of significant areas that comprise existing employment land, risks a loss (rather than gain) of land and premises for employment provision within the city. It is notable that many of the areas being allocated for redevelopment within the plan, comprise high functioning (and higher value) employment land. The plan fails to meet the needs of the City for employment land, even assuming that no employment land is lost, without factoring displaced needs arising from redevelopment.
- Given the sub-regional role provided by the City, if the strategy is to not fully meet economic development needs within the boundaries, but rely on the wider area (part of the Functional Economic Market Area) then there should be clear and effective co-operation with neighbouring authorities, including (but not limited to) East Devon, where there are significant opportunities for development in and around the West End (in close proximity to various existing large employment centres).

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)

- The plan needs to be far clearer on how employment and economic development needs for the City are being met in full, or the extent to which the strategy for the plan relies on meeting employment and economic development needs within the wider area (which is part of the Functional Economic Market Area). The plan needs to be far clearer on where any residual employment needs are arising (this is not currently possible as the plan does not clearly state with clarity the level of job growth being targeted) and how these needs (or any displaced uses, users or needs arising from redevelopment) will be met, which will require further close co-ordination and co-operation with neighbouring authorities (such as East Devon).

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

Yes

No

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)

- It is concerning that the plan does not state with any clarity or precision the levels of job growth being targeted and the quantum of new employment land and development that is required (with reference to acknowledged need which is shown by evidence base for the plan, including the Greater Exeter EDNA).
- Given the sub-regional role provided by the City, if the strategy is to not fully meet economic development needs within the boundaries, but rely on the wider area (part of the Functional Economic Market Area) then there should be clear and effective co-operation with neighbouring authorities, including (but not limited to) East Devon, where there are significant opportunities for development in and around the West End (in close proximity to various existing large employment centres).
- The plan needs to be far clearer on how employment and economic development needs for the City are being met in full, or the extent to which the strategy for the plan relies on meeting employment and economic development needs within the wider area (which is part of the Functional Economic Market Area). The plan needs to be far clearer on where any residual employment needs are arising (this is not currently possible as the plan does not clearly state with clarity the level of job growth being targeted) and how these needs (or any displaced uses, users or needs arising from redevelopment) will be met, which will require further close co-ordination and co-operation with neighbouring authorities (such as East Devon).

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)

Yes

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)

We would like the ability to participate in the hearing sessions if required in the future to elaborate further on the issues raised in these representations and participate in the discussion on this issue.

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>