

TOPIC PAPER: ECONOMY & JOBS

September 2025

Exeter City Council

Civic Centre

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EX1 1JN



Exeter
City Council

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1. Introduction

- 1.1 This topic paper presents the policy background and the key evidence supporting the economy and jobs chapter of the Exeter Plan and then sets out the issues arising through the Regulation 19 consultation.
- 1.2 This paper sits alongside and can be cross-referenced to, the 'Statement of Issues' report and the 'Schedule of Suggested Modifications'.

2. National policy context

2.1 The Exeter Plan adheres to the transitional arrangements detailed in paragraph 234a of the current National Planning Policy Framework (NPPF). Therefore, the Exeter Plan will be examined under the previous NPPF published in December 2023.

2.2 Paragraph 86 (of the NPPF, Dec 2023) states that:

‘Planning policies should:

a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.’

2.3 It is considered that the Exeter Plan adheres to the Framework requirements, specifically because the Exeter Plan:

- Sets a clear vision and strategy for sustainable economic growth in the city
- Sits well with, and has reference to, national growth priorities expressed in the UK
- Supports development proposals that meet the economic needs of the city
- Allocates key new strategic employment sites
- Brings forward regeneration and mixed-use redevelopment
- Encourages innovative and green growth
- Encourages new and flexible working practices
- Delivers new forms of employment provision
- Protects land required for transport infrastructure
- Prioritises investment in infrastructure through the Infrastructure Delivery Plan and Community Infrastructure Levy
- Is flexible and allows changes of use where justified by current evidence
- Meets the economic needs of the Functional Economic Market Area by working jointly with its neighbouring authorities.

2.4 And finally, there is a strong cohesive joint strategy (see ‘Our Shared Coordinates’ below) to deliver economic growth across the region.

3. Our Shared Coordinates

- 3.1 Our Shared Coordinates is a joint strategy for East Devon, Exeter, Mid Devon and Teignbridge. The Joint Strategy demonstrates the commitment to ongoing joint working across the area on strategic matters and will be used by the four Councils as a prospectus to help guide investment and funding across the sub-region, helping us deliver sustainable growth and achieve our ambition to position the area as one of the best places to live and work in the United Kingdom
- 3.2 It commits all parties to work together to address the needs of the area, stating:
- ‘Together the city, towns and villages operate as one single functional area for housing, economy and travel’.
 - ‘Demonstrate the joined-up strategy and policy approach the Councils have taken across the functional area’.
 - ‘Given Exeter’s strong research, education institutions and growing innovation ecosystem, the rapid expansion of the knowledge economy will continue’.
- 3.3 The economy is therefore clearly identified as a strategic, cross-boundary issue for the wider area.

4. Supporting evidence

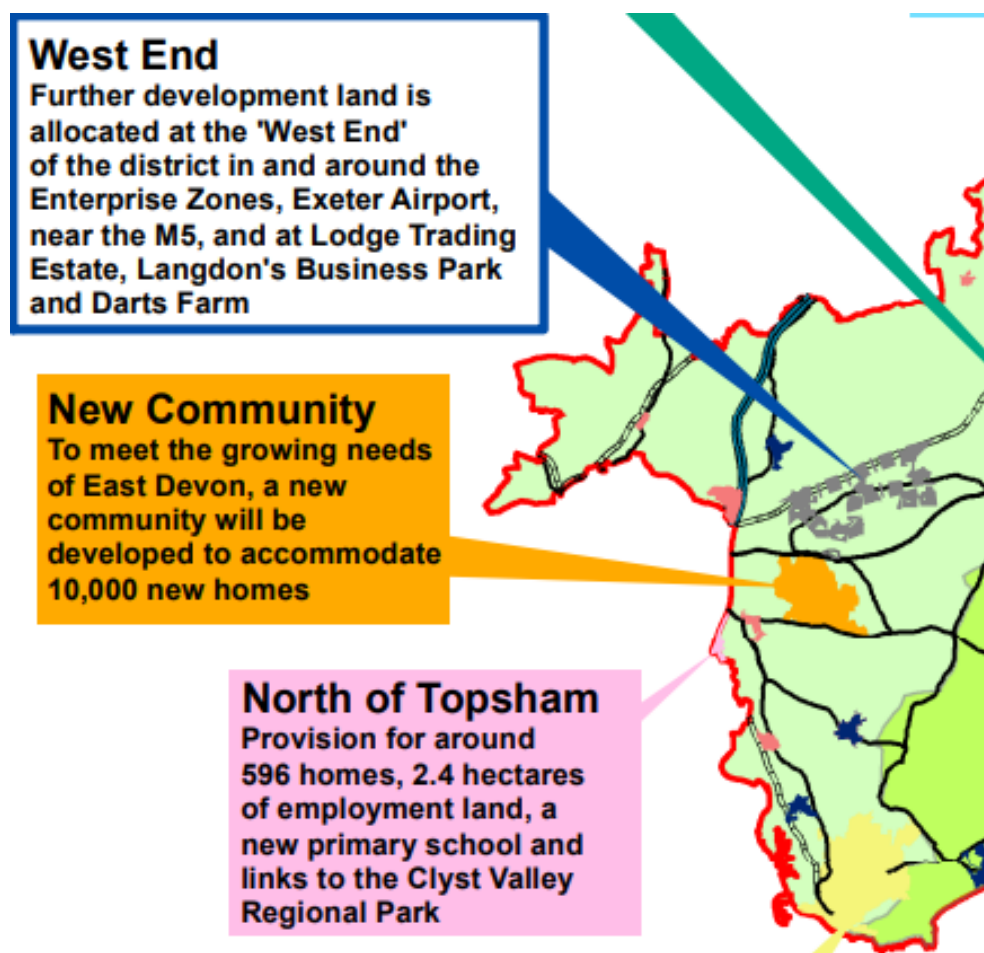
- 4.1 Planning Practice Guidance (PPG) sets out guidance on assessing the need for and supply of employment land. It states that the assessment of need should be evidence based and should be assessed at the level of the functional economic market area (FEMA).
- 4.2 The assessment should consider:
- The existing stock of employment land.
 - Recent gains and losses to the stock.
 - Evidence of market demand, including market intelligence, surveys, and discussions.
 - Evidence of market failure.
 - Market signals relating to economic growth, diversification, and innovation.
- 4.3 The key evidence base for the economy and jobs chapter of the Exeter Plan, the Greater Exeter Economic Development Needs Assessment (EDNA), follows the PPG and meets the above requirements.
- 4.4 The joint commission of Hardisty Jones Associates (HJA) to undertake the Economic Development Needs Assessment (EDNA) was the continuation of a long history of joint working within Greater Exeter on cross boundary strategic issues such as the economy. The first EDNA was completed as evidence for the Greater Exeter Strategic Plan back in 2017 and the current EDNA followed on from that. The EDNA covers the Functional Economic Market Area of East Devon, Exeter, Mid Devon and Teignbridge.
- 4.5 All four authorities were involved in the commissioning and resourcing this joint cross boundary evidence base and all four authorities are utilising the work in evidencing their emerging Local Plans.
- 4.6 Exeter has also commissioned four additional evidence documents from HJA since the EDNA was completed to help inform the Exeter Plan:
- Employment Floorspace in strategic allocations.
 - Employment change in Exeter.
 - Employment supply in Greater Exeter.
 - Office vacancy evidence (summary presented at Appendix A).
- 4.7 These are all available as evidence base documents on the Council website.

5. Why is the Functional Economic Market Area key?

- 5.1 A Functional Economic Market Area (FEMA) is not constrained by administrative boundaries but reflects the way the economy works; the relationships between where people live and work, the scope of service market areas and catchments. The EDNA establishes and evidences the extent of the FEMA.
- 5.2 PPG sets out guidance on assessing the need for and supply of employment land. Need should be assessed at the level of the FEMA.
- 5.3 The evidence sets out the need for employment land across the FEMA; whilst an individual authority area breakdown is also provided, the EDNA is clear that much of the need for employment land generated within Exeter must be met outside Exeter's administrative boundaries.

6. Understanding the need for employment land across the FEMA

- 6.1 Whilst a significant element of the employment land need for the FEMA is generated in Exeter (as a result of projecting forward past growth, which in turn drives a need for replacement premises) the constrained nature of Exeter's administrative boundary necessarily means that much of this need will be met outside the boundary, within the area that is effectively part of Exeter in functional terms, in the eyes of the market.
- 6.2 This has been the case in the past and will continue to be the case going forward. This relationship provides strong support for the City Council's spatial strategy. It also supports East Devon District's Council's spatial strategy as set out in their emerging Local Plan, which seeks to allocate a significant quantum of employment land with the 'West End' of East Devon, adjacent to Exeter's administrative boundaries. An extract from EDDC's key diagram clearly illustrates this:



- 6.3 However, it remains vital to ensure that the need and supply are matched across the FEMA so the economic growth of the area is not constrained. This is explored further in the next chapter.

7. Need and supply position across the FEMA

Employment land need and supply (from the EDNA)

7.1 The EDNA assessed employment need and supply across the FEMA.

Employment land need (from EDNA):

	East Devon	Exeter	Mid Devon	Teignbridge	TOTAL
Office – mid point	7	21	3	6	37
Industrial – mid point	65	50	49	54	218
Total need – mid point	72	71	52	60	255

7.2 The EDNA concludes that the ‘middle of range’ need, for office and industrial land, across the FEMA was **c 255ha**.

7.3 The ‘middle of range’ need, for office and industrial land, under the ‘Clean growth’ scenario was **c 258ha**.

Employment land supply (from EDNA):

	East Devon	Exeter	Mid Devon	Teignbridge	TOTAL
Total supply	106	12	50	61	229

7.4 The EDNA assessed the supply, for sites rated amber or green, across the FEMA was **229ha**.

7.5 Therefore, the EDNA concluded that there was insufficient employment land available in Greater Exeter to meet the forecast need and therefore more sites needed to be allocated in order to meet that need.

Updated supply position (across FEMA)

7.6 More recent data on supply shows a different picture to that set out in the EDNA.

East Devon:

7.7 The Regulation 19 Publication Draft East Devon Local Plan (February 2025)¹ sets out the provision of 178 ha of employment land (Strategic Policy SP04), comprising:

- Sites allocated in the Draft Local Plan (not at new communities) – 90.7 ha – set out at paragraph 3.27 of the document.
- Sites at Cranbrook – 19.2 ha.

1

<https://eastdevon.gov.uk/media/gtimzhle/regulation-19-plan.pdf>

- Sites at a second new community (up to 2042) – around 17.5 ha.
 - Sites built 2020-2024 – 6.8 ha.
 - Sites with planning permission or under construction at 2024 – 44 ha.
 - Additional windfall sites are expected to come forward.
- 7.8 The total supply of land is now significantly higher than the 106 ha of employment land considered by JLL in the EDNA.
- 7.9 The supply of 178 ha, when compared to a stated need for 80 ha (Strategic Policy SP04), suggests a significant over-supply of employment land in East Devon.

Exeter:

- 7.10 The Publication Draft Exeter Plan includes three new employment land allocations totalling 15.5 ha across three sites:
- Land Adjacent to Sandy Park, Newcourt (7 ha)
 - Land Adjacent to Ikea, Newcourt (4 ha)
 - St Luke's Campus (4.5 ha).
- 7.11 Within the publication Draft Exeter Plan these are specifically for the transformational sectors; however, a suggested modification to the Exeter Plan would make this less restrictive.
- 7.12 Of these three, Newcourt was considered in the Greater Exeter EDNA supply review. Two sites were reviewed, Newcourt A and Newcourt B. Newcourt A was a 4.64 ha greenfield site suitable for industrial, and RAG-rated green (i.e. likely to be delivered). This is the site titled 'Land adjacent to Ikea, Newcourt', allocated in the Publication Draft Exeter Plan (albeit a slightly smaller site area). Newcourt B (a crescent shaped site just east of Ikea) was a 1.82 ha site, suitable for offices, but RAG rated red (i.e. unlikely to be delivered). The EDNA notes that a planning application for housing had been submitted for this site.
- 7.13 The EDNA review included a further seven potential employment sites, with a cumulative 5.25 ha of employment land, all RAG-rated green and amber. Of this land, 2.39 ha was suitable for offices and 2.85 ha was suitable for industrial.
- 7.14 The 5.25 ha of sites identified in the EDNA (excluding Newcourt sites), together with the 15.5 ha of new allocations, suggests a supply of 20.75 ha of employment land.

Teignbridge:

- 7.15 Teignbridge District Council have recently gone through Examination of their own Local Plan. In response to the Inspector's matters, issues, and questions² (September 2024) their evidence states a need for 65 ha of employment land over the plan period.
- 7.16 Table 9 in the response (page 29) sets out the supply of employment land, comprising 31.6 ha of extant Local Plan allocations and a further 68.3 ha of

² <https://www.teignbridge.gov.uk/media/vbrpqy0e/cs3-matter-3-overall-scale-of-housing-and-employment-growth.pdf>

Submission Local Plan allocations, giving a total supply of 99.9 ha (c100ha). The total supply of land is now significantly higher than the 61 ha of employment land considered by JLL in the EDNA.

- 7.17 The supply of 100ha when compared to a stated need for 65 ha, suggests a significant oversupply of employment land in Teignbridge.

Mid Devon:

- 7.18 No new data has been published for Mid Devon.

Updated FEMA supply position:

- 7.18 Together, the latest data set out above, suggests a significantly larger supply of potential employment than was identified in the EDNA – a total of 349 ha compared to the 229 ha reviewed in the EDNA. Most of the newly identified supply is in East Devon and Teignbridge.

- 7.19 The updated position, taking into account new allocations, is as follows:

	East Devon ³	Exeter ⁴	Mid Devon ⁵	Teignbridge ⁶	Total
Total supply	178	21	50	100	349

FEMA - Need v supply fit:

- 7.20 If we compare 'middle of range' need (which seems the most appropriate figure to take as the base-point for plan making purposes) with the updated supply position (taking into account proposed allocations) we have an overallocation across the FEMA of approximately **94ha**.
- 7.21 If we instead consider the 'Clean Growth' scenario (which incorporates a 'policy on uplift') there is an overprovision across the FEMA of approximately **91ha**.

³ See Reg 19 rep and [3. Exeter Reg 19 Local Plan consultation.pdf](#) See paragraph 5.7 – includes existing supply and new allocations

⁴ Exeter Plan - Existing supply 5.25ha (EDNA) and new proposed allocations 15.5ha (Policy EJ6)

⁵ Mid Devon – no new data – figures above taken from EDNA

⁶ [cs3-matter-3-overall-scale-of-housing-and-employment-growth.pdf](#) – page 29 - Table 9: Employment allocations - extant and new – 'In recognition of the total provision figure of 65 hectares, the Local Plan has identified the following sites as allocations as shown in Table 4 below, alongside extant allocations from the adopted 2013-33 Local Plan. Taken as a whole, the 29 package of employment sites provides a total of just under 100 hectares which comprises 153% of the overall requirement total, as well as opportunities for windfall sites under Policies EC1 to allow for an important degree of flexibility of choice for smaller businesses in particular which accords with the provisions of para 82 (d) of the NPPF.'

8. Issues raised at Regulation 19

- 8.1 The representations to the Publication Draft Exeter Plan have been reviewed. Common issues, responses and proposed modifications (main and additional minor modifications) are set out below.

Issue 1: Insufficient employment land identified to meet need

Summary of representations received:

- 8.2 Exeter has not identified enough employment land in the Publication Draft Exeter Plan to meet the need generated by potential growth in the city's economy, and this will constrain future growth. It is claimed that it is inappropriate to match the requirement for and supply of employment sites and premises across the FEMA, that each authority should accommodate its own need. The Publication Draft Exeter Plan is not clear regarding need and supply of employment land.

Response:

- 8.3 The following points are made in response to this issue:

Efforts have been made in the preparation of the Exeter Plan to identify employment allocations. Three significant allocations are being proposed in the Exeter Plan together with other forms of employment provision at the strategic brownfield mixed use allocations. A series of three calls for sites were held seeking a range of allocations, including employment. Proactive attempts were made to stimulate an interest in allocating further sites for employment, including at the Toby Carvery site which was proposed within the Full Draft Plan.

- The City of Exeter generates significant growth potential but has limited land within its administrative boundary to accommodate this. The growth of the City's economy can take place outside its boundary. The Publication Draft Exeter Plan acknowledges the City's shortage of employment land and refers to the city's role within a FEMA, stating that need and supply should be matched across Greater Exeter.
- The principle of matching requirement and supply across the FEMA is well established and is reflected in the commissioning and use of the Greater Exeter Economic Development Needs Assessment (EDNA) in the preparation of the Draft Local Plans in the area.
- The current employment land need and supply position across the FEMA indicates that supply significantly exceeds need and therefore economic growth potential will not be constrained.

Modifications suggested:

- 8.4 Additional (minor) modifications to the supplementary text will be suggested to set out the potential for economic growth generated by the FEMA and to show how this is met by the constituent authorities.

Issue 2: EDDC employment allocations only meet its own need

Summary of representation received:

8.5 East Devon District Council contends that its own employment land allocations only meet the District's own needs.

Response:

8.6 The Draft East Devon Local Plan has identified 178 ha of employment land supply to meet a need for 80 ha generated by the East Devon economy (as determined by the EDNA). The Draft East Devon Local Plan appears to be meeting the long-established principle of considering need and supply across the FEMA. Without considering the principle of balancing supply and needs across Greater Exeter, East Devon's Plan could be seen as over-providing employment sites, leaving some sites vulnerable to proposals for alternative use.

Proposed modifications:

8.7 No modifications proposed.

Issue 3: No request under the Duty to Cooperate

Summary of representation received:

8.8 There has been no request under the Duty to Cooperate for EDDC to accommodate some of Exeter's growth.

Responses:

8.9 The following points are made in response to this issue:

- There has been joint working and duty to cooperate meetings ongoing since before the first Exeter Plan Issues Consultation in 2021; efforts to reach agreement with duty to cooperate partners will continue until submission.
- The Joint Strategy 'Our Shared Coordinates' has been published and adopted and commits East Devon, Exeter, Mid Devon and Teignbridge to work together to address economic needs. This Joint Strategy specially covers 'jobs and prosperity' stating: 'There is a significant opportunity to ensure that the benefits of growth in and around Exeter are shared across our whole area'.
- An officer report to the EDDC strategic planning committee states⁷: 'There has been ongoing work and dialogue with the city council officers as their plan has progressed and more critically we share many evidence documents and joint working approaches with the City Council, and in this respect also with Teignbridge District Council and Mid Devon District Council' (para 2.3).
- There has been no request under the Duty to Cooperate as the need for employment land has been exceeded across the FEMA.

Proposed modifications:

8.10 No modifications proposed.

Issue 4: The Exeter Plan does not include a jobs growth target

⁷ [3. Exeter Reg 19 Local Plan consultation.pdf](#) – paragraph 2.3

Summary of representation received:

- 8.11 The Publication Regulation 19 Exeter Plan did not include a jobs target and some representations suggested that this should be included.

Response:

- 8.12 HJA were commissioned to investigate what would be a suitable and deliverable jobs target for inclusion in policy EJ1: Economic Growth.
- 8.13 The report 'Employment Change in Exeter' concludes:
- Over the period from 2020 to 2040, the City of Exeter is expected to see growth of between 11,300 and 11,900 FTE jobs that do not require employment premises. Some of these jobs may be in the transformational sectors.
 - Existing employment land identified in the Greater Exeter EDNA could accommodate up to 1,800 office use class FTE jobs and up to 300 industrial use class FTE jobs.
 - The proposed employment allocations sites could accommodate up to 1,800 FTE jobs in a mix of Use Classes and up to 5,100 FTE jobs if development is in Use Class E(g) only.
- 8.14 Adding together the above figures suggests the potential for employment growth within the City of Exeter to exceed the EDNA clean growth forecast of 14,900 FTE jobs.

Proposed Modification:

- 8.15 A main modification will be suggested to policy EJ1 and additional (minor) modifications will be suggested to the supporting text to set Exeter's jobs growth target.

Issue 5: Sites should not be restricted to the transformational sectors**Summary of representation received:**

- 8.16 The restriction of proposed site allocations to employment in the transformational sectors has been challenged, suggesting the City of Exeter needs to accommodate growth across many more sectors.

Response:

- 8.17 The Publication Draft Exeter Plan already indicates that development proposals will be supported where they meet the economic needs of the city as identified in the EDNA (see policy EJ1: Economic growth). However, it is the case that new site allocations were identified specifically for transformational uses. As a result of representations received at Regulation 19 stage this approach has been reconsidered and whilst these sectors will undoubtedly be important to the future of the City's economy, it has been determined to suggest a main modification to the Local Plan to take a less prescriptive approach to the nature of occupiers of the new allocated sites. Under the modification these sites will be open to all classes of economic development that meet the economic needs of the city as identified in the Economic Development Needs Assessment.

Proposed modifications:

- 8.18 Main modifications will be suggested to Policy EJ1: Economic Growth, to move away from a particular focus on the transformational sectors and to take a more balanced approach that also refers to the priority sectors identified in the UKs

Modern Industrial Strategy. Modifications will also be suggested to Policy EJ6: New employment allocations, to remove the requirement that these newly allocated sites should be for transformational uses and to instead allocate these sites for all types of employment development that help meet the economic needs of the city as identified in the EDNA. Associated additional (minor) modifications will also be made to supporting text.

Issue 6: Loss of employment

Summary of representations received:

- 8.19 Concerns are raised about the loss of employment on the strategic mixed use brownfield sites and the potential lack of delivery of new/replacement premises in these areas (due to development viability issues). Similar concern regarding the loss of employment were raised regarding the impact of policy H3: Regeneration opportunity areas.

Response:

- 8.20 Exeter has responded to previous concerns regarding brownfield sites (at Regulation 18 stage) by removing Marsh Barton and North Gate from the list of allocations. The brownfield allocations at Exe Bridges and South Gate do not contain any traditional employment uses. The Exeter Plan is seeking to make the most efficient use of brownfield land and this accords with the approach advocated by national policy. Allocations policies in the Publication Draft Local Plan state that the amount of employment floorspace on Water Lane and Red Cow will be retained and that employment will form part of the mixed use redevelopment at East Gate and South Gate. Policy EJ3 also requires the delivery of new forms of employment provision within all the strategic mixed use brownfield sites. Significant parts of a number of the strategic mixed use brownfield sites are in public ownership, meaning the City Council has direct control over the delivery of development.
- 8.21 The regeneration opportunity areas are not allocations but are a proactive attempt to ensure efficient use of brownfield land in accordance with the approach advocated by national policy. Furthermore, the policy criteria for any proposed regeneration requires any development proposals to 'ensure no loss of employment floorspace'.

Proposed modifications:

- 8.22 No modifications proposed.

Issue 7: The definition of employment land

Summary of representations received:

- 8.23 The Exeter Plan glossary definition of employment land does not include all uses in Use Class E. It is therefore contended that policy EJ2 cannot be delivered as a restrictive policy cannot override a statutory provision which is more generous.

Response:

- 8.24 Whilst it is agreed that a policy cannot override a statutory provision, this is not the intention. The glossary definition of employment land is for the purposes of application of policies in the Economy and Jobs chapter of the Exeter Plan. Policy EJ2, and others in the Exeter Plan, will only apply to development requiring

planning permission. However, for the avoidance of doubt and to provide further explanation of the approach additional supporting text is proposed.

Proposed modifications:

- 8.25 Additional (minor) modifications will be proposed to ensure it is clear that policy EJ2 only applies to development or redevelopment requiring planning permission and to explain that it is the traditional employment uses that often struggle to find appropriate sites or land and to refer to the conditions and legal agreements that can be used to limit future use.

Appendix A – Office vacancy rates in Exeter

Reference to the business rates data base of vacant premises indicated that in 2025 there were 646 vacant premises (listed under the office category) in Exeter. This seemed high and therefore in response to this HJA were commissioned to take a closer look at this office vacancy data; their report is available to view [here](#):

It is apparent that whilst the Exeter Employment study reported (in 2022) a vacancy rate of 5% within the city centre and c1% outside the city centre, these vacancy rates have increased significantly with the recent study suggesting levels of 18.5% in the city centre and 9.6% outside the city centre.

This represents a significant increase in vacancy rates and is perhaps reflective of the current uncertainty in the office market.

Appendix B – Full text of representations

Full text of all representations received at Regulation 19 stage:

Chapter 7 as a whole: economy and jobs

East Devon District Council

Comments:

'East Devon District Council object to chapter 7, Economy and Jobs, of the Exeter local plan as it - 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 Council's 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.

'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.

Modifications:

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.

Various developers have made similar points under EJ1 (see below).

EJ1: Economic growth

Bloor Homes Exeter

Comments:

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).

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).

Modifications:

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).

Broom

Comments:

[bold] Please note that these representations should be read in conjunction with representations submitted to previous consultations of the Exeter Plan made by McMurdo LPD on behalf of our Client. [bold]

[bold] Policy EJ1 Economic Growth [bold]

Policy EJ1 suggests that development proposals will be supported where they meet the economic needs of the city identified by the Economic Development Needs Assessment (EDNA).

The EDNA (2023) notes that Exeter is the main office location in Greater Exeter, but that it has insufficient employment land to meet the forecast demand for both offices and industrial development between 2020-2040 and that there is limited scope for more employment land in the city beyond that identified. It confirms that some of the demand stimulated by the city's economy will need to be accommodated in its hinterland, in adjoining local authority areas.

Despite the recognised demand for industrial development within the EDNA, policies EJ1 (and EJ6) focus its support on the transformational sectors. Despite the clear need for industrial employment land identified within the EDNA, the proposed policies and allocations do not explicitly encourage, support or allocate land for new industrial development. Further, despite the omission of North Gate and high performing employment land at Marsh Barton as formal residential-led allocations, their identification as regeneration opportunity areas has potential to result in a net loss of employment land in Exeter.

As evidenced by the EDNA, there is a substantial and demonstrable shortfall in industrial employment land, particularly for logistics across the sub-region and this is highlighted in a recent appeal decision in East Devon. Appeal reference APP/U1105/C/22/3295011 for land at Hill Barton, Sidmouth Road, Clyst St Mary refers to an application for HGV parking.

This appeal decision refers to the East Devon Economic Land Review published by EDDC in October 2023. The Economic Land Review indicated current demand for over 50ha of employment space, of which 80% relates to the logistics sector. In contrast, the Review indicated that only 1.7ha, of which over 70% is office space, is available. It continued that, over the period 2019-2040 demand for employment space in East Devon was expected to be nearly 130ha, of which over 123ha would be for industrial and logistics space. In contrast, current and future supply over that period was anticipated to be approximately 87ha, indicating a shortfall of 43ha at the end of period 2019-2040.

The Inspector highlighted, that logistic businesses need locations with good access to the road network, and in this part of Devon, this means that demand is focused on Exeter and around the M5. The decision recognised that the west part of East Devon is located within that market area with potential sites for development to meet the needs of logistics operators being both within and outside of East Devon. EDDC accepted, in response to the appeal, that more land needs to be found for logistics operators.

The Inspector concluded that there is a demonstrable and significant shortfall in the provision of employment land in the area around Hill Barton Business Park, particularly for logistic operators and that this must carry significant weight in the planning balance. See Appeal Decision here [embedded link: https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf].

The EDNA acknowledges that there is limited land available in Exeter to meet the demand stimulated by Exeter's economy, and that land will need to be found in neighbouring authorities. This appeal decision and East Devon's own evidence acknowledges that the West End of East Devon is well located in the market area to meet the employment needs of East Devon and neighbouring authorities.

As above, the evidence suggests that Exeter cannot meet demand for employment land supply within its administrative area. Therefore neighbouring authorities must, under the Duty to Cooperate, allocate land to meet its needs and those of neighbouring authorities where needs cannot be met within its plan area. In the case of both employment land and housing land, the West End area of East Devon is best placed to meet Exeter's need/demand.

ECC and EDDC (and arguably other administrative areas) are failing in their Duty to Cooperate. The Exeter Plan needs to address the shortfall in housing and employment land supply either by allocating additional deliverable land within its administrative boundary to meet Exeter's need or alternatively if this is not possible it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the housing and employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

Exeter is more than 2,000 houses behind in the current plan period (See Authority Monitoring Report 2023-2024 here [embedded link: https://exeter.gov.uk/media/iysnvjih/241219_amr-2023-2024_final_with-covers_accessible.pdf]) and doesn't have a 5 year housing land supply (See Committee Agenda for Planning Committee here [embedded link: <https://committees.exeter.gov.uk/ieListDocuments.aspx?CId=116&MIId=7826&Ver=4>]).

Clearly, it doesn't have enough employment land (See EDNA). East Devon, its neighbour, has 2.97 years housing land supply (See SPC Report here [embedded link: <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=15050>]) and a recent appeal (See Appeal Decision here [https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf]) found that it had only 2Ha of employment land available. Advice from Inspectors following the EiP into Teignbridge DC's Plan means that TDC will have to reconsult on housing policies that provide for growth from Exeter (and Torbay).

The evidence shows a failure in the DTC.

Para. 7.6 of the Exeter Plan states that *[italic]'the partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to continuing to work together, in accordance with the duty to cooperate, to address any shortfall in employment land to ensure the continued economic success of the wider area'. [italic]*

However, EDDC propose to object to the Exeter Plan as set out in a report to the EDDC Strategic Planning Committee on the 4th February 2025 (See EDDC Report SPC here [embedded link: <https://democracy.eastdevon.gov.uk/documents/s26150/3.%20Exeter%20Reg%2019%20Local%20Plan%20consultation.pdf>]). The objection is on the basis that it fails to make available sufficient land for employment provision. EDDC Officer's recommended response recognises that the Exeter Plan does not refer to the Exeter specific employment land requirement nor how the Exeter Plan has addressed this need. It notes that the Exeter Plan fails to state that it will meet an Exeter quantified need and that *'[italic] no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land need identified in 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.'* [italic]

Whilst not explicit in the Exeter Plan, as suggested by EDDC, the Exeter Plan appears to rely on the collective land supply for employment across the sub-region, without formal request under the duty to co-operate. ECC (and arguably other authorities in the sub-region) are failing in their duty to cooperate and this must be addressed for the Exeter Plan to be found sound.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

Modifications:

The Exeter Plan needs to address the significant and demonstrable shortfall in employment land supply recognised by the EDNA either by allocating additional land within its administrative boundary to meet Exeter's need or alternatively if this is not possible (which as evidenced by the EDNA is highly likely) it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) development needs broadly in line with the issues the subregion faces.

Comments:

Finally, we note that the Reg.19 consultation proposes a number of significant changes to Policy EJ1 relative to the Reg.18 version, as set out below.

Reg.18 draft consultation wording:

'The City Council is committed to supporting Exeter in becoming one of the UK's leading knowledge economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics;
- Environmental futures;
- Health innovation;
- Digital innovation;
- Creative industries; and
- Other emerging transformational sectors.

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training to encourage and support growth in the transformational sectors.'

Reg.19 draft consultation wording:

'Development proposals will be supported where they meet the economic needs of the city as identified in the Economic Development Needs Assessment.

The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge and clean growth economies. To help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- Data analytics;
- Environmental futures;
- Health innovation;
- Digital innovation;
- Green economy;
- Creative industries; and
- Other emerging transformational sectors.'

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth in the transformational sectors.'

The insertion of the additional paragraph at the start of this policy, which states that development proposals will be supported where they meet the economic needs of the city, is welcomed as a step in the right direction in terms of the Council acknowledging the contribution which other types of economic development can generate. However, reflecting the thrust of our comments above, it is considered that by linking the policy wording to the findings of the council's Economic Development Needs Assessment, the policy wording is potentially not providing general support in principle for proposals which will deliver economic benefit to the city which may not be captured by this study.

By amending the wording of the policy to reflect the suggestions below, it is also considered that it will bring the policy wording in line with the supporting text to the policy, which acknowledges (para 7.10) that [italic] ‘In supporting economic growth, the City Council aims to ensure that [underline] all the city’s citizens gain from the prosperity and wellbeing generated by the local economy’ [underline] [italic] (our emphasis).

Modifications suggested:

Accordingly, it is requested that the wording of draft Policy EJ1 is revised to state:

[italic] ‘Development proposals will be supported where they [red] make a positive contribution to employment generation and meeting [red] the economic needs of the city [strikethrough] as identified in the Economic Development Needs Assessment. [strikethrough]

The City Council is committed to supporting Exeter in becoming one of the United Kingdom’s leading knowledge and clean growth economies. To help deliver this, appropriate development proposals for the following transformational sectors will [red] in particular [red] be supported:

- *Data analytics;*
- *Environmental futures;*
- *Health innovation;*
- *Digital innovation;*
- *Green economy;*
- *Creative industries; and*
- *Other emerging transformational sectors.*

The City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth in the transformational sectors.’ [italic]

Stuart Partners Ltd

Comments:

[bold] Please note that these representations should be read in conjunction with representations submitted to previous consultations of the Exeter Plan made by McMurdo LPD on behalf of our Client. [bold]

[bold] Policy EJ1 Economic Growth [bold]

Policy EJ1 suggests that development proposals will be supported where they meet the economic needs of the city identified by the Economic Development Needs Assessment (EDNA).

The EDNA (2023) notes that Exeter is the main office location in Greater Exeter, but that it has insufficient employment land to meet the forecast demand for both offices and industrial development between 2020-2040 and that there is limited scope for more

employment land in the city beyond that identified. It confirms that some of the demand stimulated by the city's economy will need to be accommodated in its hinterland, in adjoining local authority areas.

Despite the recognised demand for industrial development within the EDNA, policies EJ1 (and EJ6) focus its support on the transformational sectors. Despite the clear need for industrial employment land identified within the EDNA, the proposed policies and allocations do not explicitly encourage, support or allocate land for new industrial development. Further, despite the omission of North Gate and high performing employment land at Marsh Barton as formal residential-led allocations, their identification as regeneration opportunity areas has potential to result in a net loss of employment land in Exeter.

As evidenced by the EDNA, there is a substantial and demonstrable shortfall in industrial employment land, particularly for logistics across the sub-region and this is highlighted in a recent appeal decision in East Devon. Appeal reference APP/U1105/C/22/3295011 for land at Hill Barton, Sidmouth Road, Clyst St Mary refers to an application for HGV parking.

This appeal decision refers to the East Devon Economic Land Review published by EDDC in October 2023. The Economic Land Review indicated current demand for over 50ha of employment space, of which 80% relates to the logistics sector. In contrast, the Review indicated that only 1.7ha, of which over 70% is office space, is available. It continued that, over the period 2019-2040 demand for employment space in East Devon was expected to be nearly 130ha, of which over 123ha would be for industrial and logistics space. In contrast, current and future supply over that period was anticipated to be approximately 87ha, indicating a shortfall of 43ha at the end of period 2019-2040.

The Inspector highlighted, that logistic businesses need locations with good access to the road network, and in this part of Devon, this means that demand is focused on Exeter and around the M5. The decision recognised that the west part of East Devon is located within that market area with potential sites for development to meet the needs of logistics operators being both within and outside of East Devon. EDDC accepted, in response to the appeal, that more land needs to be found for logistics operators.

The Inspector concluded that there is a demonstrable and significant shortfall in the provision of employment land in the area around Hill Barton Business Park, particularly for logistic operators and that this must carry significant weight in the planning balance. See Appeal Decision here [embedded link: https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf].

The EDNA acknowledges that there is limited land available in Exeter to meet the demand stimulated by Exeter's economy, and that land will need to be found in neighbouring authorities. This appeal decision and East Devon's own evidence acknowledges that the West End of East Devon is well located in the market area to meet the employment needs of East Devon and neighbouring authorities.

As above, the evidence suggests that Exeter cannot meet demand for employment land supply within its administrative area. Therefore neighbouring authorities must, under the Duty to Cooperate, allocate land to meet its needs and those of neighbouring authorities where needs cannot be met within its plan area. In the case of both employment land and housing land, the West End area of East Devon is best placed to meet Exeter's need/demand.

ECC and EDDC (and arguably other administrative areas) are failing in their Duty to Cooperate. The Exeter Plan needs to address the shortfall in housing and employment land supply either by allocating additional deliverable land within its administrative boundary to meet Exeter's need or alternatively if this is not possible it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the housing and employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

Exeter is more than 2,000 houses behind in the current plan period (See Authority Monitoring Report 2023-2024 here [embedded link: https://exeter.gov.uk/media/iysnvjih/241219_amr-2023-2024_final_with-covers_accessible.pdf]) and doesn't have a 5 year housing land supply (See Committee Agenda for Planning Committee here [embedded link: <https://committees.exeter.gov.uk/ieListDocuments.aspx?CId=116&MId=7826&Ver=4>]). Clearly, it doesn't have enough employment land (See EDNA). East Devon, its neighbour, has 2.97 years housing land supply (See SPC Report here [embedded link: <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=15050>]) and a recent appeal (See Appeal Decision here [embedded link: https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf]) found that it had only 2Ha of employment land available. Advice from Inspectors following the EiP into Teignbridge DC's Plan means that TDC will have to reconsult on housing policies that provide for growth from Exeter (and Torbay).

The evidence shows a failure in the DTC.

Para. 7.6 of the Exeter Plan states that [italic] 'the partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to continuing to work together, in accordance with the duty to cooperate, to address any shortfall in employment land to ensure the continued economic success of the wider area'. [italic]

However, EDDC propose to object to the Exeter Plan as set out in a report to the EDDC Strategic Planning Committee on the 4th February 2025 (See EDDC Report SPC here [embedded link: <https://democracy.eastdevon.gov.uk/documents/s26150/3.%20Exeter%20Reg%2019%2>])

0Local%20Plan%20consultation.pdf]). The objection is on the basis that it fails to make available sufficient land for employment provision. EDDC Officers recommended response recognises that the Exeter Plan does not refer to the Exeter specific employment land requirement nor how the Exeter Plan has addressed this need. It notes that the Exeter Plan fails to state that it will meet an Exeter quantified need and that [italic] 'no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land need identified in 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.' [italic]

Whilst not explicit in the Exeter Plan, as suggested by EDDC, the Exeter Plan appears to rely on the collective land supply for employment across the sub-region, without formal request under the duty to co-operate. ECC (and arguably other authorities in the sub-region) are failing in their duty to cooperate and this must be addressed for the Exeter Plan to be found sound.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

Modifications suggested:

The Exeter Plan needs to address the significant and demonstrable shortfall in employment land supply recognised by the EDNA either by allocating additional land within its administrative boundary to meet Exeter's need or alternatively if this is not possible (which as evidenced by the EDNA is highly likely) it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) development needs broadly in line with the issues the subregion faces.

Exeter Civic Society

Comments:

ECS records that EJ1 is not compliant with the supporting text, as this says that 'meeting economic development needs' should not only include 'by supporting the transformational sectors', but also by 'retaining established employment areas' (7.6).

Modifications suggested:

ECS suggests a rewording of the second paragraph of EJ1, which should read:

'The City Council is committed to

a) retaining and further enhancing existing employment areas, and

b) supporting Exeter in becoming one the United Kingdom's leading knowledge and clean growth economies. Help deliver this, appropriate development proposals for the following transformational sectors will be supported:

- *Data analytics. [...]*

University of Exeter:

Comments:

The University fully supports policy EJ1 and its emphasis on fostering the city as a leading knowledge economy. It also appreciates the acknowledgment in the supporting text of the significant economic benefits the University contributes.

EJ2 – Retention of employment land

ROK Planning on behalf of Chex Developments

Comments:

The wording of Policy EJ2 (Retention of employment land) has been amended since the previous Full Draft Exeter Plan consultation. The updated wording is as follows:

The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use may be considered acceptable where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future.

The Client objects to the amended wording, for the following reasons:

- The updates made to the wording of the policy are unclear and confusing.
- Previously, this policy clearly allowed for flexibility on the loss of employment floorspace where
 - a) Sites are allocated for redevelopment.
 - b) Where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040
- In the updated wording, these exceptions have been amended to specify 'mixed use' redevelopment and change the wording on future viability. They have also been expanded to include "where regeneration would make more efficient use of the land".
- However, the wording of this additional point reads as follows "Elsewhere, the loss of employment land to an alternative use may be considered acceptable ... where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace". The Client therefore argues that this sentence is entirely contradictory.
- The supporting text confirms that the Policy's aim is to protect employment floorspace in allocated employment areas whilst allowing for the change of use of employment land elsewhere in the specified circumstances, including areas suitable for regeneration:

“However, it is also important to make the most efficient use of land and, in a rapidly changing economy, it may be that some sites outside the established employment areas should be released for other uses...

Existing employment land can also provide new opportunities for regeneration, combining housing and employment in ways that make more efficient use of land and meet the needs of growth sectors now and in the future. Importantly, such proposals will need to comply with Policy H3: Regeneration opportunity areas.

Policy EJ2 seeks to protect those established employment areas that are key to meeting our future employment needs, whilst elsewhere allowing for a change of use in certain specific and evidenced circumstances.”

Modifications suggested:

[...] As such, the current wording appears to be a mistake and rewording or clarification is required, for example to remove “and would not result in any loss of employment floorspace”.

- The Client also recommends that the policy worded is expanded to specifically clarify and list the locations of “where land is allocated for mixed use redevelopment”, including the East Gate strategic mixed use brownfield site.

- Similarly to Policy H3, in locations such as East Gate, where the site has been identified as a regeneration area and allocated for mixed use development with a large housing capacity, it should be clearly stated that there are no restrictions on the loss of employment space.

[bold] Recommendation: [bold] The Client recommends that Policy EJ2 is reworded, for example to remove ‘and would not result in any loss of employment floorspace’ or that further clarification is provided. It should clearly state that there are no restrictions on the loss of employment floorspace in areas suitable for regeneration such as the strategic brownfield site, East Gate.

Firstplan Limited on behalf of Costco Wholesale UK

Comments:

Whilst we welcome that there have been some changes to the wording of Policy EJ2 relative to the previous consultation, we consider further changes should be made. We maintain our view that, in order to better reflect the aims and objectives of the NPPF, the Local Plan should adopt a more flexible approach to the future use of its existing employment sites. In our previous representations, we requested that the policy wording was amended to make reference to ‘employment generating uses’, and we continue to hold the view that this represents the most appropriate approach for the policy to follow.

[underline] Reg.18 draft consultation wording: [underline]

[italic] 'The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use may be considered acceptable where land is allocated for redevelopment or where it is demonstrated that employment use is not viable or needed to meet current and long-term needs up to 2040.' [italic]

[underline] Reg.19 draft consultation wording: [underline]

[italic] 'The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained in employment use. Elsewhere, the loss of employment land to an alternative use may be considered acceptable where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future' [italic]

Modifications suggested:

[underline] Requested changes to policy wording in Reg.19 version: (note: requested changes shown in red text) [underline]

[italic] 'The established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park will be retained [red] for employment-generating uses. [red] Elsewhere, the loss of employment land to an alternative use [red] will [red] be considered acceptable where:

[red] (i) [red] the site is allocated for [strikethrough] mixed use [strikethrough] redevelopment, or

[red] (ii) [red] where regeneration would make more efficient use of the land and [red] would provide alternative employment-generating opportunities,[red] [strikethrough] would not result in any loss of employment floorspace, [strikethrough] or

[red] (iii) [red] where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future' [italic]

Carney Sweeney on behalf of CR Down Farming Ltd

Comments:

Impact on Employment Land Supply

85% of ECC's housing need is proposed to be met on existing employment land. However, there is only a finite supply of such land within the administrative area of Exeter, which ECC acknowledges.

Draft Policy EJ2 (Retention of Employment Land) seeks to protect the established employment areas at Southernhay, Matford, Pinhoe, Sowton, Exeter Business Park, Pynes Hill and Peninsula Park.

The competing objectives of protecting existing employment land and delivering sufficient housing would therefore seem to be incompatible, such that the strategy is called into question.

Modifications suggested:

None

Pegasus Group on behalf of Taylor Wimpey

Comments:

Economy and Jobs

This section identifies the significant potential for Exeter to take full advantage of opportunities for economic growth. Whilst this aspiration is supported the plan fails to consider the impact of its spatial strategy upon this aspiration.

The policy identifies that:

“...the loss of employment land to an alternative use may be considered acceptable where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future....”.

As discussed within our comments upon the spatial strategy and Policy H2 the plan is heavily focused upon the redevelopment of city centre sites for mixed use development, and regeneration areas, as outlined in Policy H3. These sites are proposed to include significant new housing. Furthermore, the supply as set out within Policy H2 is predicated upon the delivery of over 1,000 homes on windfall sites. Given the landscape constraints provided within Policy NE1 many of these windfalls will have to be within the existing urban area.

As such much of the growth will have to be delivered in areas largely occupied by existing uses which support local jobs. The delivery of this strategy will require existing businesses to either close or be relocated without any consideration to the impact upon jobs or the local economy. The net effect is likely to be the loss of jobs, at least in the

short to medium term. This will not only impact upon the economic success of Exeter but also the delivery of the strategy. This is considered a failing in the plan.

In common with our comments upon Policy H2 it is recommended that additional allocations are provided to ensure that the strategy is deliverable.

Modifications suggested:

In common with our comments upon Policy H2 it is recommended that additional allocations are provided to ensure that the strategy is deliverable.

Exeter Civic Society

Comments:

“Employment land” is defined in the Glossary as land or buildings used for specified purposes, including Use Class E (g), but not other paragraphs of Use Class E. Section 55(2) of the 1990 Act provides that movement between uses within the same class is not “development” and so does not require planning permission. Thus, any land or buildings being used for any purpose in Class E can change to any other purpose in Class E without the need for planning permission.

The policy as currently worded cannot be delivered. A restrictive policy cannot override statutory provision which is more generous.

Modifications suggested:

In the Glossary, in “Employment land” delete “Use Class Eg (including Eg(i) offices, Eg(ii) research and development, and Eg (iii) industrial processes), and replace with Use Class E (commercial)”

National Highways

Within the context of the employment land constraints identified within the Spatial Strategy and supporting EDNA, National Highways welcomes the inclusion of Strategic Policy EJ2 (Retention of employment land) which seeks to protect established employment areas from redevelopment for other uses.

No modifications suggested.

EJ3 – new forms of employment provision

Firstplan Limited on behalf of Costco Wholesale UK

Comments:

In both of our previous representations, we requested the Council should reconsider the wording of this policy, as there is an inference that the only 'new forms of employment provision' which the Council will support are the three listed in the policy wording, i.e. work hubs, collaborative workspace, and live-work schemes.

We note that there has been no change to this proposed policy approach in the Reg.19 Local Plan, although we note that there is now additional text inserted into Policy EJ1 which takes a more general policy approach in respect of how the Council will consider application for new employment development or employment-generating uses, which is welcomed. Nevertheless, Policy EJ3 could infer that the Council will not support applications which fall outside the sectors listed in the policy wording. It is considered that policy wording could dissuade securing potential investment into Exeter from wider sectors, which could in turn have the consequence of undermining the economic success of the city. There are many other forms of employment generating uses which can add value and enhance the economic profile of Exeter which fall outside these sectors. It is not appropriate to imply all large scale schemes have to incorporate these specific employment uses.

We therefore repeat our request for the approach set out in Policy EJ3 to be more accommodating in its support of other economic sectors in addition to the knowledge economy sectors which the policy seeks to prioritise. It is also considered that the requirement for all new strategic brownfield proposals to include these 'new forms of employment provision' to be unreasonable, as there may be situations where such uses are not compatible with the wider type of development being proposed.

Reg.18 draft consultation wording:

'To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment provision will be supported:

- Work hubs
- Collaborative workspace
- Live-work units Large-scale developments will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'

Reg.19 draft consultation wording:

'To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment development will be supported:

- Work hubs;
- Collaborative workspace; and
- Appropriate live-work schemes. Strategic brownfield development proposals will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.' [italic]

Modifications:

[bold] Requested changes to policy wording in Reg.19 version: [bold]

'The Council will promote economic growth by considering applications for new employment-generating uses on their individual merits. To promote sustainable growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms of employment development will in particular be supported:

- Work hubs;
- Collaborative workspace; and
- Appropriate live-work schemes.'

~~Strategic brownfield development proposals will be required to include these forms of provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'~~

McMurdo Land on behalf of Stuart Partners Ltd

Comments:

Please note that these representations should be read in conjunction with representations submitted to previous consultations of the Exeter Plan made by McMurdo LPD on behalf of our Client. [bold]

Policy EJ3

Policy EJ3 seeks to promote economic growth, reduce the need to travel, deliver high quality development and support flexible working. It supports new forms of employment development including work hubs, collaborative work space and appropriate live-work schemes.

The EDNA (2023) notes that Exeter is the main office location in Greater Exeter, but that it has insufficient employment land to meet the forecast demand for both offices and industrial development between 2020-2040. The EDNA suggests demand for 21ha (middle range) of office land versus 4ha of supply and 50ha (middle range) of industrial land versus a supply of 7ha. In response, the Exeter Plan allocates only 3 sites for transformational employment uses amounting to 15.5ha and only two of the five strategic residential-led mixed use allocations include a requirement for new employment provision. Whilst Policy EJ3 aspires to assist in boosting employment supply, this requirement of strategic mixed-use brownfield development allocations will undoubtedly impact upon the viability and therefore the deliverability of these allocations.

The Viability Assessment of the Exeter Plan indicates that the requirements of the five strategic mixed use allocations will have viability implications, with work hubs and collaborative workspace identified in para. 2.8. See Viability Assessment of Viability Plan here [embedded link: https://exeter.gov.uk/media/au0dcvqt/local-plan-viability-assessment_final.pdf]

The ECC Planning Committee has recently resolved to approve application reference 23/1007/OUT which forms part of proposed allocation SBA1 Water Lane, in accordance with the Officer recommendation See Committee Agenda for Planning Committee here [embedded link: <https://committees.exeter.gov.uk/ieListDocuments.aspx?CId=116&MId=7826&Ver=4>]. It is not evident that work hubs or collaborative workspace has been proposed as part of the development.

The recommendation concluded that the development is unviable. A Ficial Viability Appraisal (FVA) was included within the application submission, assessed by an independent consultant and considered to be consistent with the RICS Practice Statement and Guidance. The independent assessment of the FVA confirmed that the viability gap is substantial and that the development is unviable. The Committee Report confirms that, due to significant abnormal and additional costs in bringing this brownfield site forward, the development would not be able to provide affordable housing in addition to the infrastructure funding. The Committee Report confirmed that still, even without affordable housing provision, the development is unlikely to proceed without external subsidy or other intervention.

The conclusions of the application FVA is a stark contrast to the findings of the Viability Assessment (VA) of the Exeter Plan (para. 6.5) which found that the brownfield higher density allocations of VA1 Exeter central (which includes SBA1 Water Lane), [italic] 'are broadly viable as tested and able to deliver the general policy requirements'. The VA (para.6.8) caveats that 'there is little detail available on site costs or funding mechanisms for the allocation specific policies' and that 'the approach taken within the viability assessment is to separately test the likely forms of development and tenures and consider the viability headroom available to meet any site specific cost implications' [italic]. In light of this caveat (and in noting the outcome of 23/1007/OUT), the accuracy and reliability of the findings of the VA with regard to brownfield allocations is questionable.

Application reference 23/1007/OUT Water Lane (South) demonstrates that brownfield sites, even where they do not provide all policy requirements, cannot be a reliably meet development needs.

As such it cannot be concluded with certainty that policy EJ3 will reliably assist in meeting the shortfall in employment land supply.

ECC and EDDC (and arguably other administrative areas) are failing in their Duty to Cooperate. The Exeter Plan needs to address the shortfall in housing and employment

land supply either by allocating additional deliverable land within its administrative boundary to meet Exeter's need or alternatively if this is not possible it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the housing and employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) development needs broadly in line with the issues the subregion faces.

Exeter is more than 2,000 houses behind in the current plan period (See Authority Monitoring Report 2023-2024 here [embedded link: https://exeter.gov.uk/media/iysnvjih/241219_amr-2023-2024_final_with-covers_accessible.pdf]) and doesn't have a 5 year housing land supply (See Committee Agenda for Planning Committee here [embedded link: <https://committees.exeter.gov.uk/ieListDocuments.aspx?CId=116&MId=7826&Ver=4>]). Clearly, it doesn't have enough employment land (See EDNA). East Devon, its neighbour, has 2.97 years housing land supply (See SPC Report here [embedded link: <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=15050>]) and a recent appeal (See Appeal Decision here [embedded link: https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf]) found that it had only 2Ha of employment land available. Advice from Inspectors following the EiP into Teignbridge DC's Plan means that TDC will have to reconsult on housing policies that provide for growth from Exeter (and Torbay).

The evidence shows a failure in the DTC.

Para. 7.6 of the Exeter Plan states that [italic] 'the partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to continuing to work together, in accordance with the duty to cooperate, to address any shortfall in employment land to ensure the continued economic success of the wider area'. [italic]

However, EDDC propose to object to the Exeter Plan as set out in a report to the EDDC Strategic Planning Committee on the 4th February 2025 (See EDDC Report SPC here [embedded link: <https://democracy.eastdevon.gov.uk/documents/s26150/3.%20Exeter%20Reg%2019%20Local%20Plan%20consultation.pdf>]). The objection is on the basis that it fails to make available sufficient land for employment provision. EDDC Officers recommended response recognises that the Exeter Plan does not refer to the Exeter specific employment land requirement nor how the Exeter Plan has addressed this need. It notes that the Exeter Plan fails to state that it will meet an Exeter quantified need and that [italic] 'no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land need identified in 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.' [italic]

Whilst not explicit in the Exeter Plan, as suggested by EDDC, the Exeter Plan appears to rely on the collective land supply for employment across the sub-region, without formal request under the duty to co-operate. ECC (and arguably other authorities in the sub-region) are failing in their duty to cooperate and this must be addressed for the Exeter Plan to be found sound.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

Modifications suggested:

The Exeter Plan needs to address the shortfall employment land supply either by allocating additional deliverable land within its administrative boundary to meet Exeter's need or alternatively if this is not possible it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

University of Exeter:

The University welcomes policy EJ3 and its emphasis on supporting innovative forms of employment provision. The planned Innovation Hub at City Point illustrates this approach, offering a collaborative environment and serving as a focal point for innovation. The University is keen to explore additional initiatives of this nature, adaptable to various scales and contexts.

No modifications suggested.

Civic Society

Comments:

The Policy incorrectly assumes that the specified forms of development will deliver employment as set out in the Glossary. It is unlikely, for example, that a "live-work scheme" will deliver "substantial employment or economic benefits"

Modifications suggested:

In the Glossary definition of "Employment land" include "Development for new forms of employment"

National Highways

Comments:

National Highways also supports the objectives of Strategic Policy EJ3 (New forms of employment provision) which seeks to support the delivery of work hubs, collaborative workspace, and live-work schemes, contributing to a reduction in the need to travel.

No modifications suggested.

EJ4 – access to jobs and skills

Comments:

Civic Society:

It is disproportionate to require "All major developments ... to submit, and deliver the provisions in, an Employment and Skills Plan". As written, this would include a

development of 10 houses which is too low a threshold to impose such a requirement on developers, and unrealistic to expect them to be able to deliver.

Suggested Modifications:

Delete “all major development proposals” and replace with “all major mixed use development proposals”, or “all major non-residential development proposals” or “all large-scale development proposals”.

EJ5: Provision of local services in employment areas

No representations received.

EJ6 – New transformational employment allocations

McMurdo Land on behalf of The Pratt Group

Comments:

Please note that these representations should be read in conjunction with representations submitted to previous consultations of the Exeter Plan made by McMurdo LPD on behalf of our client.

The Exeter Plan allocates Site 90, land at Rydon Lane as a large scale predominantly residential site. Site 140, land adjacent to Sandy Park is proposed for allocation under policy EJ6 for “transformational” employment uses. Both sites are owned by our Client.

EJ6 New Transformational Employment Allocations

Policy EJ6 allocates land adjacent to Sandy Park, adjacent to Ikea and at St Luke’s Campus for “transformational employment” development. (Neither we nor our client fully understands what “transformational employment” is. All employment is “transformational”, surely.)

Our client doesn’t own St Lukes, but the other two sites.

The Economic Development Needs Assessment (2023) notes that Exeter is the main office location in Greater Exeter, but that it has insufficient employment land to meet the forecast demand for both offices and industrial development between 2020-2040. The EDNA suggests demand for 21ha (middle range) of office land versus 4ha of supply and 50ha (middle range) of industrial land versus a supply of 7ha.

The Exeter Plan allocates only 3 sites for “transformational” employment uses amounting to 15.5ha and only two of the five strategic residential-led mixed use allocations include a requirement for new employment provision. Further, despite the omission of North Gate and high performing employment land at Marsh Barton as formal residential-led allocations, their identification as regeneration opportunity areas has the potential to result in a net loss of employment land in Exeter, further worsening the clear and significant employment land supply shortage. Worryingly, despite the well documented demand for “normal” employment development land, neither plan policies nor allocations explicitly encourage, support or allocate land for such “normal” uses.

The Exeter Plan cannot meet the employment needs of Exeter as it fails to make sufficient land available for employment provision, in particular “normal” employment uses. That means “transformational” should be deleted from the policies.

Site 136, Land adjacent to Ikea, Newcourt (Appendix 3)

Whilst our client welcomes the allocation of land adjacent to Ikea, in light of the substantial and demonstrable shortfall in “normal” employment land, including for industrial uses, to limit the use of this land to “transformational employment” only is short-sighted. Delivery will be market led. “Transformational” should be deleted from the policies.

Site 140, Land adjacent to Sandy Park and Site 90, Land at Rydon Lane (Appendix 1)

The plan should be corrected to show land to the north and south of Old Rydon Lane (Sites 140 and 90) as one allocation for circa 14.5ha of residential development equating to 600 homes and circa 5.5ha of mixed use development equating to 190,000 sq. ft of employment development (not limited to “transformational” employment only), with associated infrastructure, all as per the Masterplans shared with the Council attached as Appendix 2.

Exeter is more than 2,000 houses behind in the current plan period (See Authority Monitoring Report 2023-2024 here [embedded link: https://exeter.gov.uk/media/iysnvjih/241219_amr-2023-2024_final_with-covers_accessible.pdf]) and doesn't have a 5 year housing land supply (See Committee Agenda for Planning Committee here [embedded link: <https://committees.exeter.gov.uk/ieListDocuments.aspx?CId=116&MId=7826&Ver=4>]). Clearly, it doesn't have enough employment land (See EDNA). East Devon, its neighbour, has 2.97 years housing land supply (See SPC Report here [embedded link: <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=15050>]) and a recent appeal (See Appeal Decision here [embedded link: https://planning.eastdevon.gov.uk/online-applications/files/A6617A2BE13B604E574649629FCEAF2F/pdf/22_0686_MFUL-APPEAL_DECISION-2727794.pdf]) found that it had only 2Ha of employment land available. Advice from Inspectors following the EiP into Teignbridge DC's Plan means that TDC will have to reconsult on housing policies that provide for growth from Exeter (and Torbay).

The evidence shows a failure in the DTC.

Modifications suggested:

The plan should be corrected to show land to the north and south of Old Rydon Lane (Sites 140 and 90) as one allocation for circa 600 homes, circa 190,000 sq. ft of commercial development (not limited to “transformational” employment only) with associated infrastructure in line with the Masterplans submitted to the Council.

In light of the substantial and demonstrable shortfall in “normal” employment land, to limit the use of land to “transformational” employment only is short-sighted because delivery will (and should be) market led, all meaning that “transformational” should be deleted from EJ6 and other related policies.

University of Exeter:

Comments:

The University welcomes policy EJ6 and the identification of St Luke's Health Campus. The Council will be aware that the University is currently working on a new masterplan for St Luke's Campus. Much work has been undertaken by the University, their advisors and officers of ECC to date in producing a collaborative document to guide new development across the campus in the future.

The University is therefore disappointed to note at supporting paragraph 7.31, that development proposals at St Luke's Campus will need to be informed by the 'Exeter Views, Density and height Study' (December 2024), prepared on behalf of the council by Allies Morrison. This Study forms part of the evidence base underpinning the emerging Exeter Plan however was produced without requesting any prior engagement from the University's St Luke's Masterplan team working with ECC's officers for the past 18 months. Having received the Study as part of the Publication Draft Local Plan in December 2024, this Representations Letter is our first opportunity to offer feedback.

It is considered that the analysis and conclusions of the 'Exeter Views, Density and height Study' has serious shortcomings, undermines much of the work undertaken on the Masterplan to date, failing to take account of the findings of several Design Boards consulted as part of this process. It is the intention of the University to submit comments on the 'Exeter Views, Density and height Study' separately and fully justify its position.

It is therefore strongly requested that all references to the 'Exeter Views, Density and height Study' are deleted in full.

Modifications suggested:

...] It is therefore strongly requested that all references to the 'Exeter Views, Density and height Study' are deleted in full.

Historic England

Comments:

New transformational employment allocations: St Luke's Health Campus is located partly within and otherwise surrounded by St Leonards Conservation Area. There are also several listed buildings close to the site, while the non-designated heritage assets of St Luke's College / North Cloisters and chapel are located within the site itself. This is therefore a sensitive site from a historic environment perspective. We acknowledge that there is scope for some redevelopment of the eastern part of the site, employing a layout and design that is more sympathetic to these assets, giving consideration to the urban grain, building heights and styles etc. We therefore welcome the commitment in supporting text at 7.32 to preparing a masterplan/Supplementary Planning Document for the site. However, it remains important that the Plan itself contains a robust policy framework to ensure that it is effective and consistent with national policy.

Paragraph 7.31 states that proposals will need to be informed by the Exeter Views, Density and Heights Study. Consistent with our comments elsewhere in this response, we believe that care is needed in applying the findings of Stage 2. At St Luke's Campus we are concerned about the illustrated massings and we do not consider that there is sufficient evidence that a building of up to 8 storeys would be appropriate in this location (for example how would this impact the set piece of the College/North Cloister and Chapel in views from around Heavitree Road?). We are also concerned about the level of harm shown to the visual connection between the Cathedral and Baring Crescent, with a narrow corridor illustrated that would partially conserve views from the centre of the crescent only. As the aspirational figure of 44,000 sqm referred to in 7.30 appears to have been generated by the Stage 2 report, this should also be reviewed as there is not yet sufficient evidence that this capacity could be accommodated sensitively.

EJ6: New transformational employment allocations (Strategic policy): To ensure a robust policy framework consistent with other strategic sites, and respond appropriately to the

evidence base, we consider that additional provisions should be incorporated into the policy itself.

Modifications suggested:

Amend supporting text as follows:

“7.31 There are heritage assets within and around St Luke’s Campus, including conservation areas covering much of the surrounding residential area. Proposals at St Luke’s will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Skyline and Views Report ~~Views, Density and Heights Study.~~”

Insert section into EJ6:

“St Luke’s Campus

Proposals for St Luke’s Campus will focus on the eastern portion of the site and will be informed by archaeological and heritage assessment and be guided by a masterplan/Supplementary Planning Document. Proposals should be of high quality, should consider and respond to the environmental and heritage assets on and around the site and important strategic and local views, and should be appropriate within the context of surrounding residential development.”

National Highways

Comments:

Strategic Policy EJ6 seeks to allocate three sites for transformational employment development, including 11 hectares of land on sites adjacent to IKEA and Sandy Park within the Newcourt area, accessed from the A379 to the west of M5 J30. Accessibility from M5 J30 is recognised as an attractive opportunity, but National Highways would expect equivalent access by active and sustainable travel modes to prevent against a reliance on the private motor vehicle. We understand that the Sandy Park site is carried forward from the adopted Local Plan. An application (23/1532/OUT) for up to 158 residential dwellings and up to 17,567sqm of commercial floorspace on the allocation site is currently awaiting determination by Exeter City Council. However, National Highways offered no objection to the application, in part due to evidence of reductions in slip road traffic demand at M5 J30 during the traditional commuter peak hours.

Coupled with employment proposals adjacent to Sandy Park, the Land at Old Rydon Lane site represents a long-standing development ambition for the Newcourt area, with a planning application (reference 14/1451/OUT) for up to 392 dwellings on the site submitted in 2014. Whilst the application is currently awaiting determination by Exeter City Council, National Highways offered no objection and accepted the development would not have an unacceptable impact.

Modifications suggested:

[...] Accessibility from M5 J30 is recognised as an attractive opportunity, but National Highways would expect equivalent access by active and sustainable travel modes to prevent against a reliance on the private motor vehicle.

Appendix B:

Exeter: Existing Supply

Site 1, Park Five, Falcon Road

0.24 – site 19

City Point	0.37 – site 16 – Dave Martin confirmed that
Land adjacent to Aperture, Pynes Hill	0.84 – site 23
Land off Grenadier Road, Sowton	0.94 – site 17 – application still pending but heading for approval which might mean this area would be lost MD

Industry:

Vospers Expansion Land, Matford commenced	0.86 – site 21 – granted and use
Phase 4, Matford Green Business Park commenced	0.90 – site 22 – granted but not yet
Site at Bakers Yard, Alphin Brook Road	1.09 – site 20 – no movement

5.25ha

Newcourt A	1.82 – RAG rated red – housing likely to come forward
Newcourt B	4.64 – site 24 – No movement (and no knowledge as to when might come forward – CC)

Total – from EDNA – 12ha (but 2 ha RAG rating red)

Exeter: New allocations

Site	Size of site
Land adjacent to Sandy Park, Newcourt	7 hectares
Land adjacent Ikea, Newcourt	4 hectares
St Luke's Campus, Heavitree Road	4.5 hectares
Total	15.5 hectares

5.25ha + 15.5ha = 20.75ha = c 21ha