

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm** on **6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title

Mr

First Name

Steven

Last Name

Wiltshire

Job Title (where relevant)

Managing Director

Organisation (where relevant)

Exeter and Devon Airport Ltd

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

Mr

First Name

Robert

Last Name

Barnes

Job Title (where relevant)

Director

Organisation (where relevant)

Planning Prospects Ltd

Address Line 1

Unit 4 Mill Pool

Line 2

Nash Lane

Line 3

Line 4

Belbroughton

Post Code

DY9 9AF

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.

(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

☐

No

☒

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The NPPF provides (paragraph 86) that planning policies should, "set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period." It also states (paragraph 20) that strategic policies should make sufficient provision for employment. This should look ahead over at least 15 years (paragraph 22), and ensure that sufficient land is brought forward at a sufficient rate to address objectively assessed needs over the plan period.

The Regulation 19 Plan notes (paragraph 7.3) the role of Exeter as part of a wider FEMA also including East Devon, Mid Devon and Teignbridge. The Economic Development Needs Assessment (EDNA) is referenced and it is noted (paragraph 7.4) that there is insufficient employment land currently available in Greater Exeter to meet the forecast demand and more sites need to be allocated in order to meet that demand.

The emerging Plan states that the available employment land supply of sites across the FEMA amounts to 229 ha of which 227 ha is rated "Green" or "Amber". "Amber" sites have barriers to delivery, and only "Green" sites are considered likely to be delivered. The EDNA states that only 162 ha of land is rated as "Green" and notes (paragraph 7.3.3) that, "Exeter and Mid Devon have an under-supply of employment land, particularly when only Green RAG rating sites are considered." The 162 ha of deliverable land in the EDNA should be understood against a forecast mid-point demand for up to 284 ha of employment land in the FEMA as identified in the EDNA and referred to in the emerging Plan, so a shortfall of 122 ha. The EDNA identifies a mid-range estimate of industrial requirement in Exeter for the period 2020 – 2040 of some 50 ha.

The Regulation 19 Plan also (paragraph 7.6) confirms the commitment of Exeter and the partner authorities to work together to address any shortfall in employment land. It does not quantify what this shortfall might be, or provide further guidance as to how, when and where it will be made good.

In summary, then, national policy requires employment requirements to be identified and met. There is an outstanding requirement both FEMA wide and within Exeter that needs to be met. The shortfall of deliverable sites for employment land FEMA wide is 122 ha, and the requirement for industrial land in Exeter is 50 ha. This needs to be tackled by the emerging Plan, but the Regulation 19 document is fundamentally lacking in this regard.

There is no basic strategic policy setting out the requirement and how it will be met. For example, there is no employment equivalent to housing policies H1 (requirement) and H2 (allocations).

The Plan places emphasis on the knowledge economy and “transformational sectors” through its text and in the provisions of Policy EJ1 and Policy EJ6. However, appropriate support and provision is not then offered to all other sectors in the remaining (greater part) of the economy. The other policies in Chapter 7 deal with the retention of employment land, new types of working, skills and provision of local services, but nothing that deals with the requirements of other sectors.

This exclusion must be addressed. From the perspective of Exeter and Devon Airport Ltd as a major sub-regional employer and provider of crucial services and infrastructure particular areas of interest include (for example) engineering, logistics, tourism and business; none of this is provided for in the emerging Plan. Other sectors, ranging from (for example) construction to manufacturing and financial services, are similarly ignored. A focus on “transformational sectors” must not be to the exclusion of all else.

The City’s economy relies on very much more than such sectors. The Plan must recognise this and in the first instance acknowledge through strategic policy (EJ1) that existing and traditional sectors will be supported alongside those highlighted as having a role in the knowledge economy. The Plan must then go on to identify the requirements of these other sectors, the need for additional land, and plan for this accordingly.

Land to meet requirements for “transformational” employment is allocated by Policy EJ6. However, Policy EJ6 does not then go on to provide for the land that will be required to meet needs for the rest of (i.e., the considerable majority of) the economy. There is no further policy which seeks to deal with this. This is a significant and troubling oversight. The emerging plan in its current form does not provide for requirements in traditional employment sectors, including those upon which the future success of Exeter Airport relies.

Allocating sufficient employment land across all sectors is critical to the City and sub-regional economy, for aviation related and all other businesses, in attracting investment, creating employment, driving growth, and ensuring the area is able to prosper. The emerging plan for Exeter must grapple with this. The current approach – of focusing on one part of the economy whilst ignoring all others – is inappropriate and unacceptable.

In this context Chapter7 of the Plan is unsound because it is not positively prepared (it does not meet development requirements), it is not justified (no reason is given for a strategy which ignores key parts of the economy), and it is inconsistent with national policy (failing to plan to meet need in the manner expressed above).

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Chapter 7 should be re-written comprehensively so that it meets the basic necessity of identifying the quantum of land required to meet the needs of the economy as a whole, not just one sector, and then allocating sites to meet that need.

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

Yes

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No

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6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

The Regulation 19 Plan (paragraph 7.6) confirms the commitment of Exeter and the partner authorities to work together to address any shortfall in employment land. It does not quantify what this shortfall might be, or provide further guidance as to how, when and where it will be made good. There is no sense that this matter has been given any proper consideration, and no reliance can be placed on assertions it will be addressed in the future.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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

No, I do not wish to participate in hearing session(s)

X

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

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>