

Appendix 1:



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30th November 2022

By Email Only

Dear Sir/ Madam

MLPD 17001 On Behalf of The Pratt Group The Exeter Plan Draft Consultation Response

Introduction

On behalf of our client, The Pratt Group (TPG), we submit representations to the Outline Draft “Exeter Plan” (“plan,” “Local Plan”). All of the TPG land referred to herein is allocated for residential led development in the Core Strategy; there is a resolution to grant planning permission for 392 houses on a tranche of it. It is all greenfield land. (Please see Appendix 2).

Whilst there are many elements of the plan that our client fully supports, in this response we raise key themes that require attention by Exeter City Council (ECC) as part of the due process regarding appropriate consultation of the plan, its policies, and proposed allocations.

We go on to provide largely supportive specific responses to the plan questions in Appendix 1.

It is clearly in the interests of everyone that the city produces a “sound” “Exeter Plan” as soon as possible and our client will support the Council in this aim.

The Duty to Cooperate

The Duty to Cooperate places a legal duty on Local Planning Authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. The National Planning Policy Framework (NPPF) sets out under Paragraphs 24-27 that Local Planning Authorities and County Councils have a duty to cooperate on strategic matters that cross administrative boundaries. Paragraph 26 specifically notes that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met within a particular plan area could be met elsewhere. This process within Devon is guided by the Devon Duty to Cooperate Protocol. This protocol includes reference to the development of appropriate housing development strategies across administrative boundaries.

Exeter City Council (ECC) has a duty to cooperate with neighbouring authorities. Moreover, its Local Plan must align with the requirements of the NPPF and synchronise with East Devon District Council (EDDC)'s Local Plan, Teignbridge District Council (TDC)'s Local Plan and Mid Devon District Council (MDDC)'s Local Plan, particularly as it cannot show that it can viably meet its housing and jobs needs on land in its jurisdiction, in our client's view.

At present, ECC is proposing a 20-year Local Plan to meet its development needs without harm. This means that the Local Plan will have to earmark land to meet the required housing and jobs numbers projected for 20 years without significant harm to the climate or the environment. Encapsulated, the Council's present position appears to be that it has decided to meet its own needs on land in its jurisdiction *without* reliance on other Councils. Whilst our client would like to support the Council, unfortunately, they do not believe that this is achievable, or deliverable.

Response

Exeter City Council (ECC) is falling short in its Duty to Cooperate, to responsibly and sustainably identify and allocate the most appropriate land for development. Further work must be done to ensure that the right types of development are deliverable in the most sustainable locations around Exeter (irrespective of whether land is in ECC, TDC, MDDC or EDDC), including on our client's land holdings (Please see Appendix 2).

The plan should be prepared and refined via constant dialogue with adjoining Councils and key stakeholders including landowners. If these key stakeholders are not incentivised to take part in the plan and in development, the plan will probably fail.

5 Year Housing Land Supply

Neither Exeter City Council (ECC) nor neighbouring East Devon District Council (EDDC) have a robust 5-year land supply (*5YLS), as documented by recent appeal decisions (see below).

The shortfall/undersupply in Exeter city has been caused by the longstanding failure of the Council to apply the current local policies holistically and correctly, releasing land sequentially under AP2 and H1.

Exeter City Council's Five-Year Housing Land Supply Statement dated August 2022 which covers the five-year period from 1 April 2022 to 31 March 2027 stated that Exeter has 4 years and 10 months of land supply equating to 3,275 dwellings.

However, since then recent Appeal reference APP/Y1110/W/22/3292721 (25th August 2022) noted the absence of the 5YHLS and placed *significant weight* on the delivery of market housing in the context of the national policy objective to significantly boost the supply of homes and the "*less-than-modest*" HLS shortfall in Exeter.

Moreover, Appeal reference APP/Y1110/W/22/3296946 (11th October 2022) also confirmed that the Council is unable to deliver 5 years' supply of housing land, and that there was no substantive evidence to suggest that the Core Strategy's **minimum** target of circa 12,000 homes would be achieved in the plan period. It concluded that the Council's housing land supply shortfall is, *at least*, moderate.

Response

Our client reluctantly notes that Exeter cannot demonstrate a 5YHLS and that it has failed to deliver its annual housing requirement every year in the plan period bar one year.

Under scrutiny, the Council's Annual Monitoring Report (AMR) shows that on an annualised need of 600 dwellings per annum (so 600 dwellings per annum in a 20-year plan period means that ECC must deliver at least 12,000 houses in the 20-year plan period ending in 2026), ECC acknowledges that it has underdelivered by more than 2,000 houses to date (pro rata).

Paragraph 2.4 of ECC's 5 Year Land Supply Statement says: "Since Exeter's five-year housing requirement is based on the standard method, there is no requirement to specifically address any past under delivery of housing separately when establishing the minimum annual local housing need figure / the five-year housing requirement." And paragraph 2.6 says: "The Council is not seeking to "confirm" its five-year housing supply for a year as set out in paragraph 74 of the NPPF and therefore a buffer of 10% is not applicable. The Council passed the 2020 Housing Delivery Test with a result of 153%, meaning that a buffer of 20% is not applicable. Based on advice in the PPG, it is instead appropriate to calculate Exeter's five-year housing requirement by applying a buffer of 5% to the local housing need figure."

In short, sadly there is a housing delivery issue exacerbating an housing affordability issue, and the city, together with the western part of East Devon, is the area considered to be the economic driver for the sub region, and its growth cannot be constrained for social and economic reasons.

The under supply of housing in the current plan period needs to be correctly documented by the Council and the shortfall should be addressed within the emerging Local Plan (i.e., the shortfall should be added to the numbers required in this plan).

Sites that can accommodate development, such as those owned and controlled by our client (Please see Appendix 2), should be earmarked to accommodate flexible market driven development in line with the city's needs.

Affordable Housing Delivery

Free land, government grants and housing benefit to tenants through a restricted list of affordable housing providers has created a distorted marketplace and taken together led to a failure to deliver enough "affordable homes" in the city, in the current plan period.

Appeal reference APP/Y1110/W/22/3292721 (25th August 2022) noted that Exeter has a demonstrably acute and persistent under-delivery of affordable housing delivering only 6 affordable homes in the last year.

Whatever the reason for this, and our client is not blaming the Council entirely, clearly, the plan should face this issue head on.

Response

ECC has delivered less than 25% of total housing as affordable housing meaning significantly less than 20% as a total expected and required in the plan period. (Set against a 35% policy requirement). In other words, 2,000 houses shy in the plan period has “cost” Exeter C 700 affordable dwellings in the plan period, in a city where the house price to earnings ratio is one of the worst in England (and getting worse).

*The Local Plan must prioritise securing appropriate, **viable** levels of affordable housing within the plan period. (Inspectors often give “significant weight” to undersupply of affordable housing in decision taking).*

Our client’s landholdings can deliver viable mixed-use development which would include affordable housing.

Employment Land

Because Exeter does not have a five-year housing land supply, pressure is being put on the small amount of employment land that is available in the city, and some sites previously allocated for employment have already been granted permission for residential uses. Exeter has lost a significant amount of office accommodation to residential uses under Permitted Development Rights (PDR).

The plan says that it will deliver denser employment uses in a mixed-use environment. However, as it stands, it does not deliver the space or jobs needed for the city (and the existing businesses based there) to expand and grow or provide for existing occupiers of certain uses (B2, B8 for example) to remain.

The displacement of employers and occupiers in the city will create an imbalance with surrounding authorities, worsening the documented (including in Council papers) undersupply of employment land within the sub region.

The consequences of the emerging Local Plan “Vision” should be considered and scrutinised because the “Vision” would have negative economic consequences, certainly in the short to medium terms.

Whilst there are obvious implications for the compatibility of uses, (i.e., industrial vs. residential) in terms of, for example, amenity impacts affecting the future of existing businesses, there is no clear strategy for viably, implementing mixed use in existing “heavy” employment areas such as Marsh Barton.

Response

Simplified, the current proposed Local Plan “Vision” means that either housing will be delivered on existing employment land, displacing existing employment uses (and then land will have to be found for such employment uses), or more land will need to be found for housing because housing will not be delivered on existing employment land.

The only alternative is that the Council demonstrates that it can deliver viable mixed-use development on clearly identified sites in line with its housing and development needs in the plan period. (A “red line” around large swathes of the city including on sites in Marsh Barton, does not lead to the conclusion that the “Vision” is deliverable, sadly.)

*On this, it is short odds on that there would be very lengthy lead in times to assemble, clear, and remediate brownfield land for residential led mixed use developments. Assembling such land for redevelopment involves, as a minimum, **successful** negotiations with owners, head lessees, sub lessees, planning permission, legal agreements, geo technical work, site clearance and a thorough understanding of the uses near the site that is earmarked for mixed use development.*

Whilst brownfield redevelopment is a cornerstone of sustainable development and is an admirable aim that our client fully supports, viably delivering the vast majority of housing (including affordable housing; please see above) and employment numbers required in the plan period largely on brownfield land in a city where employment land values are already close to residential land values, would stifle development, and worsen the documented (including in Council papers) undersupply of housing and employment land in the sub region.

It is reasonable to conclude therefore that greenfield land will need to be released and that development on existing allocations should be brought forward in line with market and city needs. All our client’s land is required for development and its viable development should be fully supported by the Council via pliable Local Plan allocations.

*For the reasons highlighted above including significant aggregated undersupply in the current plan period, Greater Exeter Strategic Plan (GESP) evidence, and the fact that it is easier to deliver development on greenfield land **our client considers that greenfield land will have to supplement brownfield land for allocation, to deliver the levels of development required.***

The Emerging Local Plan Development Strategy / Vision

Exeter's planning policies are significantly out of date and its Local Plan production is in its infancy. Its officially released "Vision" is to develop housing on high performing employment land.

If the ECC Local Plan is found "sound," the current "Vision" for delivering the numbers required would be delivered across brownfield land, a substantial proportion of which is currently existing employment land. The emerging Local Plan prioritises brownfield redevelopment, meaning that amongst other employment sites, that large parts of Marsh Barton (one of Exeter's key employment areas) is proposed for residential/ mixed use redevelopment.

Viability is at the heart of policy making and whilst the brownfield redevelopment aims are laudable, for the emerging Local Plan to be found "sound" the Council will have to demonstrate that such an approach is both viable and deliverable. By this we mean that the Council must show that the proposed widespread loss of employment land is viable, weighed against the housing numbers anticipated, and that there is adequate additional employment and housing land available to meet the employment and housing requirements of Exeter and its surrounding districts.

Response:

*For the reasons highlighted above including significant aggregated undersupply in the current plan period, GESP evidence, and appeal decisions (as above) **it is considered that greenfield land will have to supplement brownfield land for allocation, to deliver the levels of development required.***

All our client's land is required for development and its viable development should be supported via pliable Local Plan allocations.

Our Client's Landholdings

Our client's land as shown in Appendix 2 is suitable and available to meet Exeter's housing and employment needs broadly in line with the issues it faces and its "Vision" papers. All of it is allocated for residential led development in the Core Strategy and our client fully expects it be allocated in the emerging plan.

The land tranches are significant and are all free of restrictive planning constraints. Located to the east of the city, they either form part of, or are close to, the Newcourt urban extension to Exeter.

Policy identifies Newcourt as a location for an urban extension and a sustainable location for housing and employment development, in line with best planning practice of focusing growth where the vast majority of physical, social and community and green infrastructure exists or is planned for.

Our client's application (14/1451/OUT) to the south of Old Rydon Lane to the west of the M5, on land in the adopted Newcourt Masterplan, for up to 392 residential dwellings and associated infrastructure, benefits from a resolution to grant planning permission, and is in the Council's housing growth figures.

Shortly our client will submit a "sister" planning application immediately to the north of Old Rydon Lane for residential led mixed-use development.

Our client supports strategic scale development in this location, however, it has concerns about specific aspects of policy and allocations in the area as follows.

Land at St Bridget's

The GESP Brownfield Sites Study (Please see Ref A below) of 2018 clearly indicates access for St. Bridget's should be via the Newcourt Way roundabout:

"Access – Primary access to the Nursery site is currently achieved via two priority junctions along Old Rydon Lane. Old Rydon Lane is a 5.5m wide local distributor road which takes the form of a country lane. As such, it is considered that Old Rydon Lane could only be used as an access route for a small quantum of housing (or secondary / emergency access) to the site.

Dependent on land availability and ownership, a new primary access would need to be achieved from the four-arm roundabout on Newcourt Way. An access spur from this roundabout has already been constructed. This would avoid the potential width and capacity constraint"

The Exeter Plan Consultation draft (Please see Ref B3 below) appears to indicate access to St Bridget's (Site Ref 83) should be from the Newcourt Way roundabout.

The HELAA (Please Ref C below) also highlights Newcourt Way roundabout as the primary access for St. Bridget's (Please see Ref C p368 to p372).

It follows that any planning application made on St Bridget's should explore an access from the Newcourt Way roundabout and that such an access should be enshrined in policy making. The plan, backed by clear evidence, should be corrected in this vein.

Land to the North and South of Old Rydon Lane

The HELAA 2022 (Please see Ref C below) shows our client's land at Sandy Park Farm (SPF) (north and south sites) (Site 90) as a "Green " for residential development for up to 950 homes.

However, it also shows land at SPF (north) in Site 89. In other words, the "north" land appears twice: as mixed use (site 89); and solely residential (site 90).

In the Exeter Plan, Site 90 does not appear in the Site Allocations papers. (Please see Ref B4 below). Instead, only the "north" land is shown in the proposed draft housing allocation (and it is "merged" into Site 89 with Sandy Gate).

The land north and south of Old Rydon Lane referred to above is allocated as part of the Newcourt urban extension.

Looking at the HELAA assessment for Site 90 (950 homes), given that the land to the south benefits from a resolution to grant permission for 392 houses, the HELAA assessment suggest that the land to the north could accommodate C550 dwellings (because it says together that the land (north and south) can take 950 dwellings) (and not only 250 across the whole of Sandy Gate).

More realistically, backed by detailed consultancy input and in line with our original HELAA submission made on behalf of our client (i.e., for Site 90), we suggest up to 170 homes and mixed-use employment of 190,000 sq. ft commercial based on land to the north, with 392 dwellings on land to the south, is achievable, viable and deliverable.

The plan should be corrected to show land to the north and south of Old Rydon Lane as one allocation for C 600 homes, C 190,000 sq. ft of commercial development with associated infrastructure.

Land at Newcourt Way Opposite Ikea

Our client's land to the east of Newcourt Way (opposite IKEA) features in the Employment Land Study (Site 29) of August 2022. It is shown as a "Green" for future employment development (as an "Undeveloped Allocation"). However, it is not shown in the plan.

Draft Policy EJ2 (Please see Ref B3 below) appears to only address existing Employment sites and appears silent on "Undeveloped Allocations". EJ2 appears to imply that Undeveloped Allocations could be re-purposed for housing:

"Elsewhere, the loss of employment land to an alternative use will be 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 or where current employment uses have an unacceptable amenity impact on local residents"

The plan should be corrected to specifically say that all "Undeveloped Allocations" identified within the Exeter Employment Study are included in the relevant policies and clearly identify our client's land as a separate mixed-use allocation. (It is allocated in the Core Strategy).

If you require further information about specific aspects of the representations, please contact us at the above address.

Our client thanks you for the opportunity to comment on the Local Plan and looks forward to further positive dialogue as the "Exeter Plan" progresses.

Thank you.

Yours faithfully,

James

James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client

For The Pratt Group

References

A: Strategic Brownfield Sites Study, LDA Design, January 2018 (Appendix A)
<https://devoncc.sharepoint.com/:b:/s/PublicDocs/Planning/EZAUrP2zAcBDiqat7miaakRUBt0lrkxCUBR6H7Hrtag9L-Q>

B1: Exeter Plan Consultation Draft –St Bridget's Site
<https://exeterplan.commonplace.is/en-GB/proposals/st-bridget-nurseries/step1>

B2 Exeter Plan Consultation Draft –Sandy Gate Site 89
<https://exeterplan.commonplace.is/en-GB/proposals/sandy-gate/step1>

B3 Exeter Plan Consultation Draft –Economy and Jobs
<https://exeterplan.commonplace.is/en-GB/proposals/economy-jobs>

B4 Exeter Plan Consultation Draft –Proposed Site Allocations
<https://exeterplan.commonplace.is/en-GB/map/proposed-site-allocations-map>

C HELAA 2022 - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663756911/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Housing%20%2526%20Economic%20Land%20Availability%20Assessment.pdf/q7x9txyxy2m0xwner5vm.pdf>

D Exeter Employment Study - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663755462/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Employment%20Study.pdf/i9m02odkejwe6f5ebrop.pdf>)

APPENDIX 1. TABLE OF RESPONSES

	17001 The Pratt Group Strategic Land at Sandy Park Farm and Adjacent to the A379
S1: Spatial strategy The spatial strategy will deliver on Exeter's Vision 2040 including the city's ambitions for net zero, health and wellbeing and the vitality of the city centre. Proposals are identified and will be supported when they: 1. Provide enough good quality homes of a variety of types in the Exeter City Council area to meet Exeter's needs. 2. Bring forward new forms of employment provision in the city and work with neighbouring Councils to ensure the employment needs of the wider functional economic market area are met. 3. Focus most development on large, strategic brownfield sites, particularly in locations close to the city centre, district centres, local centres, and key public transport hubs with good access to green infrastructure including the Valley Parks. 4. Enable the development of smaller brownfield sites as they become available. 5. Consider modest, greenfield development as a supplement to brownfield development. 6. Protect the sensitive Exe Estuary and the sensitive hills to the north and north-west of the city.	1. For the plan to be sound the Council should plan to build significantly more houses than 650 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) 2. The aim of this part of the policy is noted in terms of ensuring greater flexibility, growing different industries but the strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include longstanding successful industrial areas and uses. Where will the displaced industrial/commercial uses go? How will the displacement be managed to ensure that it does not impact negatively upon the economic growth of Exeter? Either the Plan will be found sound and housing will be delivered on existing employment land, displacing existing uses, or the plan will be found unsound and additional land will need to be found for housing. Reasonable therefore to conclude that greenfield land will need to be released. 3. The Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. 4. To expect most of the development to be sited on large, strategic brownfield sites is unrealistic Remediation of brownfield land must be considered re: effect on viability. 5. Noted and supported - as above greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour. 6. Land to the north of Exeter must not be arbitrarily protected, all sustainable and deliverable land must be considered.

7. Steer development to avoid areas of higher flood risk where possible and manage residual flood risk as appropriate. 8. Enable development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement. 9. Provide high-quality, mixed-use development at optimal densities to minimise the need to travel and maximise walking, cycling and public transport. 10. Deliver the range of infrastructure needed to support high quality development and our communities in a timely manner.	7. Noted. 8. Noted and supported. 9. Noted and supported. 10. Noted and supported, but clarification of the definition of 'optimal' needed and clarification as to how this will sit alongside requirements for adaptable dwellings which typically require larger floor areas and ground floor accommodation, the requirement for home offices and Exeter specific space standards which may require larger dwellings to accommodate these provisions. 11. Consideration needs to be given as to how this may affect viability.
S2: Liveable Exeter delivery principles The delivery of large-scale, brownfield developments will be supported. Planning applications for all large-scale development proposals must be accompanied by a masterplan which includes a vision and planning/design framework to guide the comprehensive development of the wider site area. All large-scale development proposals must demonstrate how each of the following Liveable Exeter principles and requirements will be achieved. Principle 1: Memorable places. Development	To expect most of the development to be sited on large, strategic brownfield sites is unrealistic, and greenfield land both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. The point regarding making efficient use of land is noted and supported. This appears to correlate with the point about "optimal densities" and clarification will be required as to how this sits alongside the requirement for adaptable dwellings which typically require larger floor areas and ground floor accommodation, the requirement for home offices and Exeter specific space standards which may require larger dwellings to accommodate these provisions. In addition, more space will be required for shared road networks, pleasant streets with street furniture. All of which will add to the land take of development and potentially prevent a 'compact' development. The point regarding the provision of a variety of high-quality homes and local jobs is noted and supported. However, the strategy for house building in Exeter relies heavily on the

Principle 2: Outstanding quality. Development Principle 3: Welcoming neighbourhoods. Development Principle 4: Liveable buildings. Development Principle 5: Active streets. Development Principle 6: Spaces for people and wildlife.	redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan does not show will such uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. The Plan does not show how quality homes be provided alongside noise and odour generating B2 and B8 uses. The provision of homes that are dual aspect will be more difficult for higher density developments such as flats/apartment blocks. Will the term 'predominantly' be quantified and defined? Matters like cycle parking, storage, electric vehicle infrastructure, areas for play, food growing etc will need to be quantified and consideration given to how the provision of all these matters will affect the viability of developments.
CE1: Net zero Exeter	The Local Plan must prioritise development in sustainable locations to minimise car travel etcetera.
CE2: Local Energy Networks	Consideration needs to be given to how such measures will impact the viability of developments coming forward.
CE3: Flood risk	Noted and supported.
H1: Housing requirement Exeter City Council will target the delivery of at least 650 homes per year between 2020 and 2040. To meet this target and allow for a headroom of 10%, delivery of 14,300 homes is proposed from the following sources:	For the plan to be sound the Council should plan to build significantly more houses than 650 per annum, helping to meet ECC's development needs and creating plan resilience over time (in terms of e.g., housing land supply and the affordability of new homes) The site allocation strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan does not give any detail on how such uses sit alongside residential

• 2,024 completions in 2020/21 and 2021/22 • Approximately 5,380 homes from existing planning consents • Approximately 6,205 homes on site allocations • Approximately 691 homes on windfall sites	dwelling without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. Will such homes be considered quality homes? To expect most development to be sited on large, strategic brownfield sites is unrealistic and greenfield land (beyond the modest sites) both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. The remediation of brownfield land will affect the viability of development and so deliverability.
H2: Housing allocations	See response for policy H1 and EJ2.
EJ2: Retention of employment land 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 will be 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 or where current employment uses have an unacceptable amenity impact on residents.	Previous policy H2 suggests that Marsh Barton, for example, will be a mixed-use site but this policy suggests that the whole site has the potential to be redeveloped outside of employment uses. If the whole of a site was earmarked for redevelopment and came forward as a full residential proposal, how would this effect employment land supply and jobs? This policy would appear to allow a complete redevelopment of an employment site to residential development, which is not sustainable. New residential developments alongside existing employment uses could lead to situations where employment uses are forced to vacate due to pressure from nearby residents due to an impact on amenity. This policy could render those sites earmarked for mixed uses being fully redeveloped for housing.
EJ3: New forms of employment provision	Policies S1 and S2 refer to making efficient use of land and optimum densities. Policy S2 also refers to adaptable dwellings. This policy refers to all large-scale developments incorporating work hubs, collaborative workspaces, and live work units. The supporting paragraph suggests this could mean all new homes having home offices or designed to facilitate home working. Optimal density and space standards will need to be defined taking the additional provisions

	within new homes into account. Assuming this will result in the need for larger dwellings, how will this effect affordability?
STC1: Sustainable movement	The intention to redevelop existing employment sites to mixed use developments is unrealistic considering the wording of policy EJ2. While the intention may be to provide mixed use developments on these sites to accord with policy STC1, policy EJ2 could 'undo' this by later allowing the further redevelopment of previously retained employment uses due the impact of these uses on residential amenity of new homes in these locations. Will such developments remain sustainable without the employment uses in walking distance?
STC4: Public transport proposals	Our client supports the provision and enhancement of sustainable modes of transport. Consideration needs to be given to the viability of developments where such contributions are required especially where they are required in the early phases of development proposals.
NE1: Landscape setting areas	Noted. However, greenfield sites will need to be identified within and adjacent to Exeter to supplement brownfield projects if the plan is to be found sound. Sites within Landscape Setting Areas may represent a sustainable form of development where harm is localised, appropriately mitigated and where such developments are located adjacent to the settlement boundary, and this should be recognised within the Plan.
NE2: Valley Parks	These must be brought forward with stakeholder/landowner input for them to be deliverable.
NE3: Biodiversity	The requirement for 10% biodiversity net gain could render many developments unviable especially where they are vegetated (even in urban areas). Where biodiversity net gain is required, there will need to be recognition within the plan that other contributions/policy requirements may not be provided. There will need to be mechanism to set out the priorities for contributions.
NE4: Green infrastructure	Consideration needs to be given to the viability of developments because of these requirements and others in the plan. Clarity required on what would necessitate contributions towards green infrastructure and gateway access points.

D1: Design principles	Policy states that planning permission will be granted for development that... ‘Contributes to the provision of a compatible mix of uses which work well together to create vital and viable places; retains and refurbishes existing buildings of good townscape value’ compatible with site allocations for the redevelopment of existing employment sites to include residential uses? Existing industrial uses (B2 and B8 uses) are unlikely to be compatible with residential uses yet a high proportion of the housing land supply relies on the redevelopment of existing employment sites. The policy states that planning permission will be granted for development that... ‘Ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale.’ However, paragraph 3.10 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area on most sites. The Plan doesn’t demonstrate that these two aims/objectives are compatible.
H1: Health and wellbeing	The policy states that ‘Developments will make financial payments towards improved health infrastructure commensurate with any additional demand placed on the existing provision.’ This requirement will need to meet the tests of planning obligations and requests well evidenced. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC1: Delivery of infrastructure	The policy states that developer contributions will be sought through the community infrastructure levy and section 106 to ensure that the necessary physical, social, economic, and green infrastructure is in place to deliver development. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC2: Community facilities	Consideration needs to be given to the viability of developments because of these requirements and others in the plan. How will additional demand be calculated? Will the calculation be based on an expected level on in-migration to Exeter vs. those moving within the city?

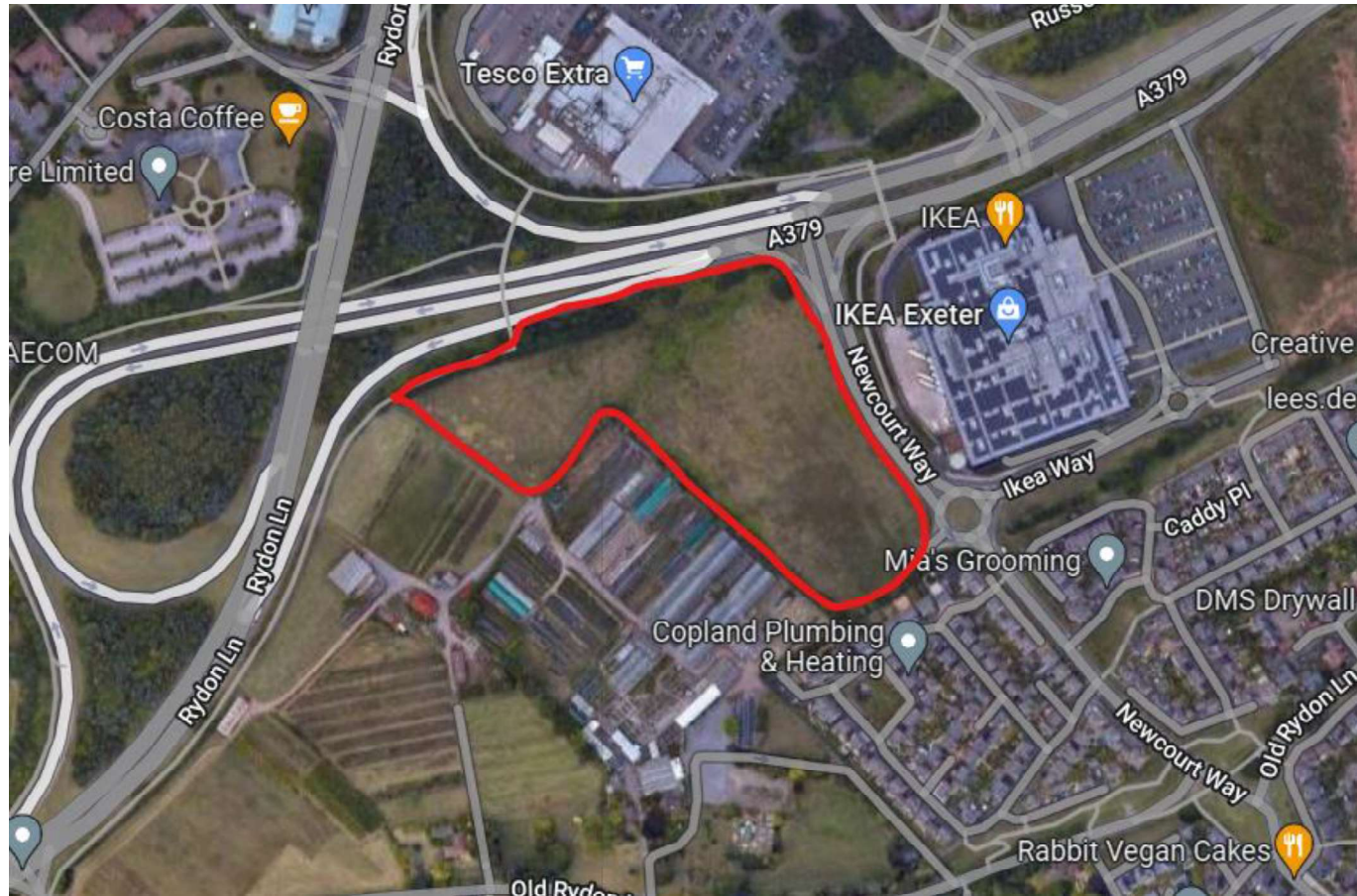
Site Allocations	
Sandy Gate – Site Reference 89	What we say above under Client’s Landholdings in particular refers. The plan, backed by clear evidence, should be corrected to ensure that any planning application made on St Bridget’s should explore an access from the Newcourt Way roundabout. The plan should be corrected to show land to the north and south of Old Rydon Lane as one allocation for C 600 homes, C 190,000 sq. ft of commercial development with associated infrastructure. The plan should be corrected to specifically say that all “Undeveloped Allocations” identified within the Exeter Employment Study are included in the relevant policies and clearly identify the land at Newcourt Way Roundabout as a separate mixed-use allocation.

APPENDIX 2. Client's Landholdings

LAND AT OLD RYDON LANE



LAND ADJACENT TO IKEA



Appendix 2:



a The Basement Office
4 Baring Crescent
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Exeter City Council
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15th January 2024

By Email Only

Dear Sir/ Madam

MLPD 17001 On Behalf of The Pratt Group Regulation 18 Representations to Supplement Representations Made to The Exeter Plan Outline Draft Consultation

Introduction

1. On behalf of our client, The Pratt Group, we submit Regulation 18 representations to “The Exeter Plan” which supplement previous representations made in December 2022 to the “Draft” plan.
2. Our client’s land is located in Exeter and is relevant to Exeter’s “Vision” and policies.
3. Some of its land is proposed for allocation:
 1. 350 houses; Old Rydon Lane; Site 89
 2. 7 Ha employment land; Sandy Park; Site 140
 3. 4 Ha employment land; Newcourt; Site 136

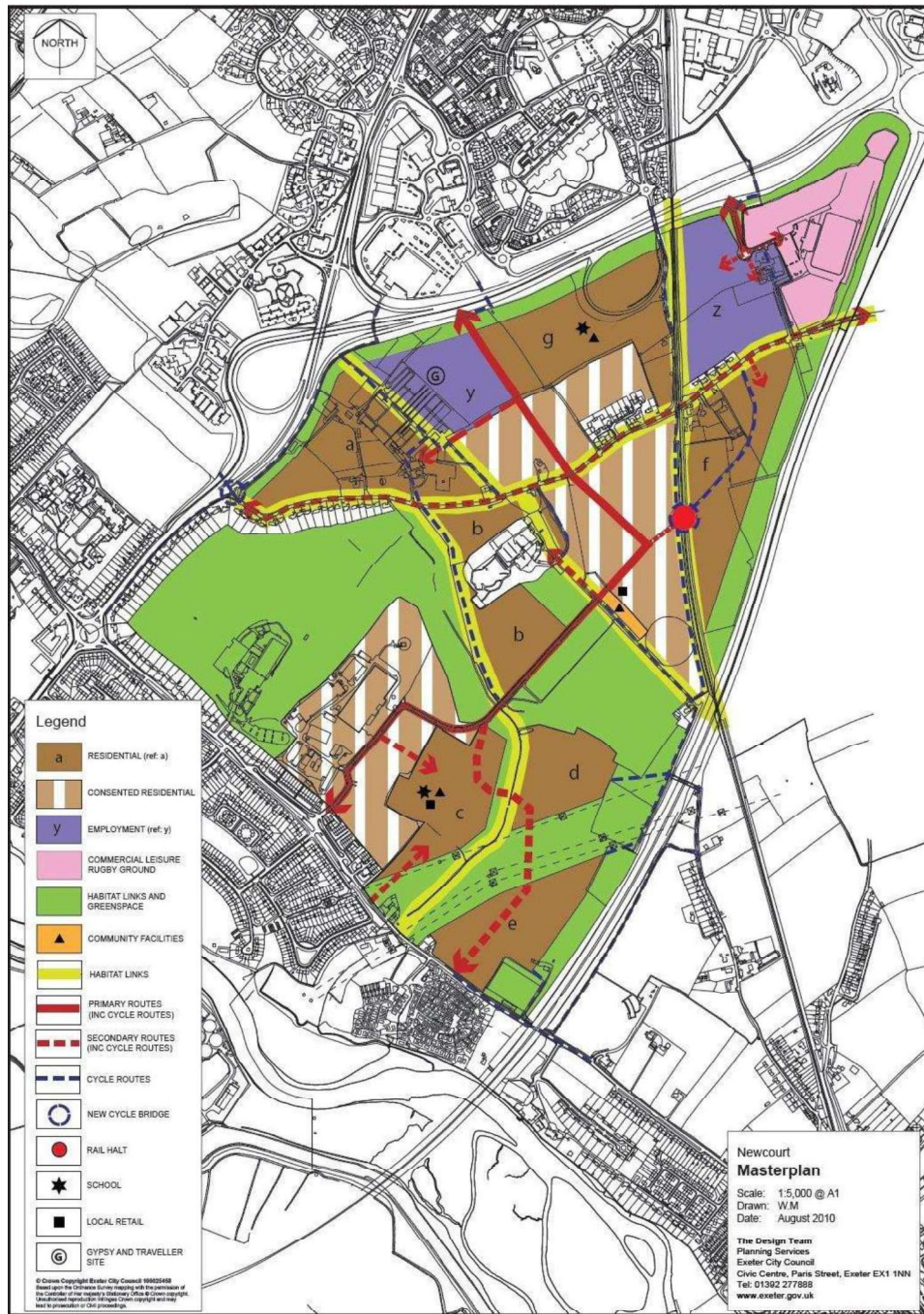
Notes

- i. Sites 89 and 140 are closely related.
- ii. Site 136 and the St Bridget site (Previously allocated for 350 houses; St Bridget; Site 83; now shown as unallocated) are closely related.

4. Our client broadly endorses the allocations but makes specific comments below that will have to be addressed by Exeter City Council.
5. Our client's comments are split to deal with:
 1. Sites 89 and 140 which we will call "Land at Sandy Park Farm",
 2. Site 136 and the St Bridget Site which we will call "Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way".
6. Holistically, the plan has not changed, and our client stands by their previous comments. Consequently, please read the representations now made in conjunction with our December 2022 comments (and comments made in 2021).

Our Client's Landholdings

7. Our client's land is suitable and available to meet Exeter's housing and employment needs broadly in line with the issues it faces and its "Vision" papers.
8. All of it is allocated for development in the Core Strategy and is proposed for allocation in the emerging plan.
9. The land tranches are significant and are all free of restrictive planning constraints. Located to the east of the city they are part of the Newcourt urban extension to Exeter.
10. Policy identifies Newcourt as a location for an urban extension and a sustainable location for housing and employment development, in line with best planning practice of focusing growth where the vast majority of physical, social and community and green infrastructure exists or is planned for.



Newcourt Masterplan

1. Land at Sandy Park Farm

11. Our client's application (14/1451/OUT) to the south of Old Rydon Lane and to the west of the M5, on land in the adopted Newcourt Masterplan, for up to 392 residential dwellings and associated infrastructure, benefits from a resolution to grant planning permission, and is in the Council's housing growth figures. It is Site 89.
12. Our client has submitted a "sister" planning application immediately to the north of Old Rydon Lane for mixed-use development. It is Site 140. The Planning Statement, for that application is attached as an Appendix 4. Section 3 of that statement, in particular refers. It states:

"Site and Surroundings

- 3.1 *The site is located on the eastern edge of Exeter (See Maps 1-8) north of Old Rydon Lane and to the west of the M5. The Exeter to Exmouth railway line runs adjacent to the western boundary. To the north is Sandy Park Way and the A379. To the East is Sandy Park Stadium and David Lloyd Leisure. To the south-east is the new Marriott Courtyard hotel. The site is on a slight south facing slope and it comprises lower grade agricultural land.*
- 3.2 *Further east, beyond the M5 motorway the land falls to the Clyst Valley, which is characterised by rolling farmland falling to the River Clyst, which meanders through its floodplain. Native hedgerows form field boundaries and there are loose groups of native and non-native mature trees predominately on field boundaries and in the grounds of existing properties.*
- 3.3 *Irregularly shaped, predominantly arable farmland (still farmed) with nine dwellings of previously converted farmhouses/barns, outlying barns and sheds and a small commercial premises of offices and stores with hardstanding/storage areas (the existing dwellings are occupied as is the commercial premises), the application site is located near to Junction 30 (J30) of the M5 Motorway.*
- 3.4 *Allocated as part of the Newcourt area strategic development allocation, the scheme evolution has considered existing and proposed developments (i.e. built and permitted developments) and responds to its context, representing best practice in the design of mixed-use environments, fully according with National planning policy and existing and emerging local planning policies.*

- 3.5 *Following the principles of the Newcourt area Masterplan, it would deliver high quality, much needed, development on an allocated site, by bringing forward a housing and employment led mixed use scheme with supporting local facilities, creating jobs within the Newcourt Urban Extension, all of which is enshrined in existing and emerging policies.*
- 3.6 *The land immediately to the south of the site is under the same ownership. This land together with land owned by others benefits from a Resolution to Grant (RTG) Planning Permission for up to 392 residential dwellings with associated infrastructure subject to a Section 106 Agreement (Planning Reference: 14/1451/OUT). (Site 89; see below). This application (on Site 140; see below) together with the RTG site (14/1451) would form a cohesive and coordinated development “finishing off” the Newcourt extension at its eastern edge. Our client’s representations to the emerging Local Plan will make these points, too.*
- 3.7 *The proposal is in a highly sustainable location within the City and is within close proximity to the nearby Digby Halt and Newcourt railway stations, retail, employment, and educational facilities, all of which are within walking distance. Beyond the immediate boundaries, the site is broadly surrounded by new development including;*
- The Newcourt residential areas are located to the west with IKEA and King’s Heath to the north-west.*
 - To the north is the residential area at Apple Lane with Digby Halt station and Sowton Industrial Estate beyond.*
 - To the East is the M5 motorway, Clyst Road and East Devon.*
 - To the south-east is the Marriott Courtyard hotel.*
 - To the south-west is Newcourt railway station.*
 - Fields to the south of Old Rydon Lane below the site have received a Resolution to Grant Planning Permission for residential use (392 dwellings).*
- 3.8 *Exeter City Council’s emerging Local Plan Full Draft Oct 2023 reflects the Newcourt Masterplan and calls the application site “Site 140”. It calls the land to the south of Old Rydon Lane “Site 89” (this is the land that benefits from a RTG for*

392 dwellings). (See Map 6 below. “Site Location” is “Application Site” and “Site 140”; and “Southern Parcel” is “14/1451” and “RTG site” and “Site 89”)



Map 6 (From Transport Assessment SLR)

- 3.9 Site 140 and Site 89 are allocated for employment uses (Policy EJ6) and residential uses respectively in emerging policies. Policy EJ5 supports provision of local services within employment areas. To create a serviced, supported, vibrant and sustainable neighbourhood, a mix of uses together with employment is proposed hence this proposal. Access from the A379 to site 89 would require a new spine road which would bisect site 140.
- 3.10 The David Lloyd Leisure Centre and Sandy Park stadium are modern, clad, large building forms with extensive paved areas. The recently built 8 storey Marriott hotel dominates the skyline in the vicinity and beyond. These structures and associated works in particular affect the site’s setting. Especially, given that the scale and massing of this recently built hotel adjacent to the site would adversely impact the provision of dwellings immediately to the west (on Site 89) the Masterplan has had to evolve, and it is better from a planning perspective to deliver mixed use development immediately west of the dominant mass of the

Marriott, to help break up and reduce the impacts that it would have. Furthermore, it is better to develop housing to the west of the new spine road with the mixed use/employment to the east and north. In essence, though our client is cognisant of blight and purchase notice procedures, it wants to work with the Council, to deliver high quality spaces for the City. Map 7 below, refers.



Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account

3.11 *Clearly, all of the foregoing, shows that Newcourt is an area in transition. Whilst the site itself is agricultural in nature, the surrounding area has changed dramatically in character over recent years. Since 2000, the Newcourt area has been developed from a semi-rural area into a successful and sustainable urban extension of Exeter. “*

Land at Sandy Park Farm Requested Changes to the Plan

13. The foregoing has led to an advanced Illustrative Masterplan for land to the north of Old Rydon Lane.



Illustrative Masterplan

14. Our client respectfully asks the Council to make changes to the plan (text and proposals map) in line with the foregoing text and the recently submitted planning application.

15. The plan (text and proposals map) should be amended to show land to the north and south of Old Rydon Lane as one allocation for C14.5 Ha of residential development (C 600 homes) and C5.5 Ha of mixed use development (190,000 sq. ft of commercial development) with associated infrastructure in line with “*Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account*”, above.

2. Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way

16. Our client fails to understand why its land is allocated and land at St Bridget is now shown as unallocated land, especially when all of the land is allocated, the City is struggling to identify and allocate enough housing and employment land to meet its needs, and when there is an existing application for housing on St Bridget land.

17. On the face of it, it looks like an attempt to ensure that the St Bridget site does not need to make the proper and safe connection to Newcourt Way in line with the Council’s adopted Newcourt Masterplan.

18. But a main reason for the Newcourt Masterplan is to ensure that the proper connections are used to benefit existing and future citizens and that land bears an appropriate burden for infrastructure paid for and provided sometimes by others. Subsequent Exeter City Council policies bolster this.

19. The GESP Brownfield Sites Study (Please see Ref A below) of 2018 clearly indicates access for St. Bridget’s should be via the Newcourt Way roundabout:

“Access – Primary access to the Nursery site is currently achieved via two priority junctions along Old Rydon Lane. Old Rydon Lane is a 5.5m wide local distributor road which takes the form of a country lane. As such, it is considered that Old Rydon Lane could only be used as an access route for a small quantum of housing (or secondary / emergency access) to the site.

Dependent on land availability and ownership, a new primary access would need to be achieved from the four-arm roundabout on Newcourt Way. An access spur from this roundabout has already been constructed. This would avoid the potential width and capacity constraint”

20. The Exeter Plan Consultation draft (Please see Ref B3 below) indicates access to St Bridget's (Site Ref 83) should be from the Newcourt Way roundabout.
21. The HELAA (Please Ref C below) also highlights Newcourt Way roundabout as the primary access for St. Bridget's (Please see Ref C p368 to p372).
22. It follows that any planning application made on St Bridget's should include access from the Newcourt Way roundabout and that such an access should continue to be enshrined in policy making. The plan, backed by clear evidence, should be corrected in this vein.
23. In simple terms the Council can try to grant permission for a substandard residential development at St Bridget's that will negatively affect existing and future residents of the City and all users of the highways network, public transport systems and green infrastructure. Or it can direct St Bridget landowners to utilise the proper connection the cost for which would be borne by the land, which is the right thing to do and is normal in a strategic Masterplan context.
24. In terms of proposed uses for its land our client firmly believes that they should be market driven and dependent upon whether St Bridget's connects, as it should, to Newcourt Way.

Land Part of the Newcourt Urban Extension to Exeter Accessed from Newcourt Way Requested Changes to the Plan

25. Our client respectfully asks the Council to make changes to the plan (text and proposals map) to:
- allocate its land at Sandy Park Farm for mixed use and for C14.5 Ha of residential development (C 600 homes) and C5.5 Ha of mixed use development (190,000 sq. ft of commercial development) with associated infrastructure in line with *"Map 7 Potential Land Uses Taking Planning Permissions Granted Into Account"*, above; and,
 - follow on from **ALL** Newcourt policy making and allocate St Bridget land as part of a wider mixed use allocation together with its land ensuring that St Bridget utilises the proper and safe access onto Newcourt Way, to benefit existing and future residents of the City and all users of the highways network, public transport systems and green infrastructure.

If you require further information about specific aspects of the representations, please contact us at the above address.

Our client thanks you for the opportunity to comment on the Local Plan and looks forward to further positive dialogue as the “Exeter Plan” progresses.

Thank you.

Yours faithfully,

James

James McMurdo MRTPI MRICS

Director

For and on behalf of McMurdo

Copies: Client; DCC

For The Pratt Group

References

A: Strategic Brownfield Sites Study, LDA Design, January 2018 (Appendix A)
<https://devoncc.sharepoint.com/:b:/s/PublicDocs/Planning/EZAUrP2zAcBDiqat7mIakRUBt0lrkxCUBR6H7Hrtaq9L-Q>

B1: Exeter Plan Consultation Draft –St Bridget’s Site
<https://exeterplan.commonplace.is/en-GB/proposals/st-bridget-nurseries/step1>

B2 Exeter Plan Consultation Draft –Sandy Gate Site 89
<https://exeterplan.commonplace.is/en-GB/proposals/sandy-gate/step1>

B3 Exeter Plan Consultation Draft –Economy and Jobs
<https://exeterplan.commonplace.is/en-GB/proposals/economy-jobs>

B4 Exeter Plan Consultation Draft –Proposed Site Allocations
<https://exeterplan.commonplace.is/en-GB/map/proposed-site-allocations-map>

C HELAA 2022 - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663756911/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Housing%20%2526%20Economic%20Land%20Availability%20Assessment.pdf/q7x9txyxy2m0xwner5vm.pdf>

D Exeter Employment Study - <https://res.cloudinary.com/commonplace-digital-limited/image/upload/v1663755462/projects/62bf1c11a56abd0b365a28db/media-upload/2022%20Exeter%20Employment%20Study.pdf/i9m02odkejwe6f5ebrop.pdf>

APPENDIX 1. AMENDED TABLE OF RESPONSES

Policies	Comment
S1: Spatial strategy	1. For the plan to be sound the Council should plan to build significantly more houses than 642 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) 2. The Exeter Employment Study suggests that 84ha of employment land is required to meet demand over the plan period. This Plan refers only to 'transformational sectors' and is silent on other employment uses. The needs of these other employment use, particularly industrial uses need to be addressed. 3. The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met. If the Plan is found to be sound in its current form, housing will be delivered on existing employment land and the displaced employment relocated. If the Plan is found to be unsound, additional land will need to be found for housing. In both scenarios it is reasonable to conclude that greenfield land will need to be released for development. Further, the Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. 4. To expect most of the development to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of

	such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing. 5. Noted and supported. It is however noted that this version of the plan as reduced the number of greenfield sites proposed since the publication of the Outline Draft Plan last year. Greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour. 6. Noted, and whilst largely supported, other forms of sustainable transport provision exist and should be acknowledged within the Plan. Further, if the Plan continues to pursue strategy which focuses on brownfield land, it must also acknowledge that brownfield sites in rural areas can also contribute to housing numbers noting the provisions of para.109 which recognises that sustainable transport solutions will vary between urban and rural areas. 7. The removal of reference to the sensitive hills ‘to the north and north west of the city’, presumably in light of recent appeal decisions, is noted. However, as with previous comments, land to the north of Exeter must not be arbitrarily protected, all sustainable and deliverable land must be considered. 8. Noted and supported.
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	9. Noted and whilst supported, Exeter is experiencing a significant shortage of both housing and employment land, such that it is important that this aim does not unnecessarily stifle development when impacts can be satisfactorily mitigated. 10. Noted and supported. 11. Noted and supported. 12. Noted and whilst supported, the term ‘optimal’ must be clarified. Further clarification is also needed to explain how this aim will sit alongside other requirements for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). 13. Noted and supported. 14. Consideration needs to be given as to how this may affect viability, particularly in light of the focus on brownfield sites.
S2: Liveable Exeter delivery principles	To expect most of the development to be sited on large, strategic brownfield sites is unrealistic, and greenfield land both within and adjacent to Exeter will have to supplement these brownfield projects if the plan is to be found sound. Principle 1 and 2: The aim of making efficient use of land is noted and supported. This appears to correlate with the point about “optimal densities” and clarification will be required as to how this sits alongside the requirement for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). In addition, more space will be required for shared road networks, streets with street

	furniture. All of which will add to the land take of development and potentially prevent a 'compact' development. Principle 3: The aim to provide a variety of high-quality homes and local jobs is noted and supported. However, the strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of which include successful industrial uses. The Plan is silent on industrial employment uses, particularly those that already exist in Exeter. The Plan does not show how such uses will sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. The Plan does not show how quality homes will be provided alongside noise and odour generating B2 and B8 uses. Whilst policy HW2, which states that development proposals will only be permitted where they 'will not place unreasonable restrictions on the future operation of existing businesses', is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met. Further, with a strong focus on the redevelopment of brownfield land for housing, it is unclear how this will impact the delivery of affordable housing in Exeter. Brownfield land is typically associated with abnormal costs, which will inevitably impact the viability of such land coming forward for housing development. Where viability implications exist this is likely to affect the delivery of affordable housing. Principle 4:
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	The provision of homes that are dual aspect will be more difficult for higher density developments such as flats/apartment blocks. It will be important to clarify which matter will take priority, higher density developments or dual aspect accommodation. Principle 5: Matters like cycle parking, storage, electric vehicle infrastructure, areas for play, food growing etc will need to be quantified and consideration given to how the provision of all these matters will affect the viability of developments.
CC1: Net zero Exeter	The Local Plan must prioritise development in sustainable locations to minimise car travel.
CC2: Renewable and low carbon energy	Noted and supported.
CC3: Local Energy Networks	Consideration needs to be given to how such measures will impact the viability of developments coming forward.
CC4: Ground mounted photovoltaic arrays	Whilst noted, preventing the development of solar arrays on land that is not classified as 3b, 4 or 5 without an assessment of all material considerations at the time of submission seems somewhat premature. The Plan includes a strong focus on lowering carbon emissions and renewable energy generation. To wholly restrict the use of other classifications of land at plan making stage appears to be at odds with this focus, when such matters can be considered on a case by case basis at decision making stage.

	Policy HH2 suggests that development proposals that result in any degree of harm to a heritage asset will only be permitted where the contribution to addressing climate change demonstrably outweighs the harm to the heritage asset. Similar wording would seem sensible here with reference to all classifications of agricultural land.
CC5: Future development standards	Noted.
CC6: Embodied carbon	Noted. Clarification is required to explain what level of information will be required to demonstrate that conversion/refurbishment is not viable/practical. This needs to be proportionate to the scale and extent of development, noting that this applies to only minor development.
CC7: Solar-ready development	Noted.
CC8: Flood risk	Noted and supported.
CC9: Water quantity and quality	Consideration needs to be given to how such contributions will impact the viability of developments coming forward.
H1: Housing requirement	For the plan to be sound the Council should plan to build significantly more houses than 642 per annum, helping to meet ECC's development needs and creating Plan / delivery resilience over time (in terms of e.g., housing land supply and affordable homes) The site allocation strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met. If the Plan is found to be sound in its current form, housing will be delivered on existing employment land and the displaced employment relocated. If the

	Plan is found to be unsound, additional land will need to be found for housing. In both scenarios it is reasonable to conclude that greenfield land will need to be released for development. Further, the Plan does not show how uses sit alongside residential dwellings without conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. Whilst policy HW2, which states that development proposals will only be permitted where they 'will not place unreasonable restrictions on the future operation of existing businesses', is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met. To expect most of the development to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing. It is noted that this version of the plan as reduced the number of greenfield sites proposed since the publication of the Outline Draft Plan last year. Greenfield sites will be required to supplement brownfield projects and the plan needs to recognise that this goes beyond a consideration of modest greenfield sites only. Moreover, where greenfield sites represent sustainable options for development, this should weigh heavily in its favour.
H2: Housing allocations	See response for policy H1 and EJ2.

H3: Affordable Housing	The site allocation strategy for house building in Exeter relies heavily on the redevelopment of brownfield sites. To expect most of the housing requirement to be sited on brownfield sites is unrealistic. Brownfield sites often have abnormal costs associated with them. The effect of such costs must be fully considered in terms of viability and whether there is a realistic prospect of such sites coming forward where these exist. Further consideration must be given to the implications of a largely brownfield housing strategy for the provision of affordable housing.
H4: Build to rent	Noted.
H5: Co-living housing	Noted.
H6: Custom and self-build housing	This policy needs to be finalised to include figures for the number of homes which will be subject to a requirement custom and self-build housing and the percentage of homes available to custom housebuilders. Comments may be forthcoming following confirmation of these figures.
H7: Specialist accommodation	Noted.
H8: Purpose built student accommodation	Noted.
H9: Gypsy and traveller accommodation	Noted.
H10: Residential conversions and houses in multiple occupation	Noted.
H11: Loss of residential accommodation	The supporting text to this policy suggests that <i>'whilst there may be occasions where other material considerations warrant the loss of residential accommodation, policy H11</i>

	<i>will ensure that existing homes are retained in most cases</i> '. The policy however does not allow any deviation, suggesting that <i>'development proposals which result in a net loss of residential units will not be permitted'</i> . Should the Council accept that there will be circumstances which warrant a loss of residential accommodation, as it should, the policy should allow for this in the text.
H12: Accessible homes	Noted.
H13: Housing density and size mix	The aim of making best use of land is noted and supported. The policy states that development proposals will make the best use of land by optimising density taking account of the local context. However, paragraph 3.12 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area on most sites. These two aims/objectives appear at odds and must be clarified, to make clear in what circumstance developing above the surrounding density will be acceptable. The aim of making efficient use of land is noted and supported. This appears to correlate with the point about "optimal densities" and clarification will be required as to how this sits alongside the requirement for adaptable dwellings (which typically require larger floor areas and ground floor accommodation) and home offices (requiring a larger floor area). In addition, more space will be required for shared road networks, streets with street furniture. All of which will add to the land take of development and potentially prevent a 'compact' development.
H14: Residential amenity and healthy homes	The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. The Plan does not demonstrate how employment uses will successfully operate alongside residential dwellings without

	conflict by means of noise, air quality, odour, impact on residential amenity and highway safety. This needs to be addressed at plan making stage. This policy suggests that provision to enable working from home will be a consideration for new housing development, it isn't however a direct requirement of this policy. This differs from supporting paragraphs to policy EJ3 which state that <i>'it will also be important for all new homes to include home offices or at least be designed in a way to facilitate home working'</i>. Further clarification on this point is required. If it is a direct requirement of this policy, such provision is likely to necessitate dwellings with larger floor areas. Whilst other policies in the plan refer to making efficient use of land, developing at optimum densities, and creating compact places, a requirement for larger dwellings at potentially lower densities may be at odds with other policy aims. Further the provision of larger homes is likely to have implications for affordability.
EJ1: Economic growth in the transformational sectors	The strategy for house building in Exeter relies heavily on the redevelopment of existing employment sites to provide mixed use developments. Many of these sites include longstanding successful industrial areas and uses. Such uses which will be displaced as a result of this housing strategy. The plan is silent on the displacement of these employment uses and needs to confirm how employment land demand will be met, not just for 'transformational sectors'.
EJ2: Retention of employment land	This policy states that the loss of employment land to alternative uses 'may be' acceptable where land is allocated for redevelopment (whereas the Outline Draft suggested the loss of such land 'will be' acceptable). Whilst this change is noted, it is minor and does not provide clarity of the circumstance in which such a loss would not be acceptable. Policy H2, by proposing the allocation of existing employment sites for residential redevelopment suggests the loss of employment uses in these locations is acceptable in principle. It is somewhat deceptive to suggest that the loss of employment

	could be discouraged in principle when other policies in the plan confirm the acceptability of its loss in principle through the allocation of such sites for residential uses. Policy H2 suggests that Marsh Barton, for example, will be a mixed-use site. Yet policy EJ2, by excluding Marsh Barton from the policy wording, suggests that the whole site has redevelopment potential to uses outside of employment uses. If the whole site were to be earmarked for redevelopment and came forward as a full residential proposal, this would have an even more damaging effect on employment land supply and jobs. Policy EJ2 would seem to allow a complete redevelopment of an employment site, which is not sustainable. If it is not the intention of policy EJ2 or policy H2 to allow the widespread loss of employment land at sites like Marsh Barton, both policies require further clarification. Further to the above, the partial redevelopment of employment land to mixed use residential schemes, may result in established business being forced to relocate due to pressure from nearby residents and impacts on amenity. Policy EJ2 may result in those sites earmarked for mixed uses by policy H2 being fully redeveloped for housing. The Outline Draft made reference to the acceptable loss of employment uses where such uses have an unacceptable amenity impact on residents, this had now been omitted. Whilst noted, the policy would still facilitate the widespread loss of employment land if allocated for redevelopment or where an employment use is deemed unviable (e.g. where additional restrictions are placed on operating business due to amenity concerns). This is a very real concern and will have implications for either housing land supply or employment land supply and needs to be addressed in the Plan.
EJ3: New forms of employment provision	Noted. This policy requires all strategic brownfield sites to include these forms of employment provision unless demand is met in other ways. This plan includes some

	residential allocations which include estimated housing numbers. If these allocations are to include the forms of employment provision required by this policy (with the exception of perhaps live/work units) they become mixed use allocations, with potential to reduce the capacity of such sites for housing. This needs to be considered further and factored into housing numbers. Additional allocations need to be proposed to make up for any loss in housing numbers.
EJ4: Access to jobs and skills	Noted.
EJ5: Provision of local services in employment areas	Noted.
EJ6: New transformational employment allocations	The proposed site allocations for employment uses do not reflect the level of demand nor shortage of supply noted in the Exeter Employment Study (2022) and Greater Exeter Economic Development Needs Assessment. The Employment Study states that demand is forecast for up to 83ha of employment land over the Plan period. These allocations fall significantly short of demand, proposing only 17ha and are proposed to serve transformational employment sectors only. The Plan is silent on the needs of other employment uses, particularly industrial uses which are likely to be displaced by the Council's house building strategy. This needs to be addressed.
HS1: The vitality of our high streets and centres	Noted.
STC1: Sustainable movement	The intention to redevelop existing employment sites to mixed use developments is unrealistic. While the intention may be to provide mixed use developments on these sites to accord with policy STC1 and other policies of the Plan, policy EJ2 facilitate the widespread redevelopment of existing employment sites. Without employment uses in

	walking distance, these developments may no longer be considered typically sustainable. Placing a blanket requirement on all major developments to include the provision of shared mobility, rather than 'suitable' developments (as required by the Outline Draft) may prevent developments from progressing when they are otherwise acceptable. In light of the housing and employment land shortage in Exeter, this is unnecessarily restrictive.
STC2: Active and sustainable travel in new developments	Noted.
STC3: Supporting active travel	Consideration needs to be given to the viability of developments where such contributions are required, particularly where they are required in the early phases of development.
STC4: Supporting public transport	Our client supports the provision and enhancement of sustainable modes of transport. Consideration needs to be given to the viability of developments where such contributions are required, particularly where they are required in the early phases of development.
STC5: Supporting new forms of car use	See response to policy ST1. Consideration needs to be given to the viability of developments where such contributions are required
STC6: Travel Plans	A blanket requirement for a Travel Plan for all major development in a City fails to take into account major development in wholly sustainable locations. A Travel Plan is a requirement of development which will generate significant amounts of traffic, as noted in the NPPF. It is unclear what ECC is trying to achieve by requesting a Travel Plan for all major developments irrespective of their location and credentials. A Travel Plan is

	required to resolve unacceptable impacts of a development, it should only be requested where a development will result in unacceptable impacts without Travel Plan being in place.
STC7: Safeguarding transport infrastructure	Noted.
STC8: Motorway service area	Noted.
STC5: Digital communications	Noted.
NE1: Landscape setting areas	Noted. However, greenfield sites will need to be identified within and adjacent to Exeter to supplement brownfield projects if the Plan is to be found sound. Sites within Landscape Setting Areas may represent a sustainable form of development where harm is localised, appropriately mitigated and where such developments are appropriately located, and this should be recognised within the Plan (as it has been in recent appeal decisions in these areas).
NE2: Valley Parks	These must be brought forward with stakeholder/landowner input for them to be deliverable.
NE3: Biodiversity	Noted. The requirement for 10% biodiversity net gain (alongside other contributions as set out in the Plan) has potential to render developments unviable particularly where they are vegetated (even in urban areas). There will need to be recognition within the plan that it might not be possible to provide all contributions/policy requirements listed in the Plan

	for reasons of viability. In these cases there will need to be a mechanism to establish the priorities for contributions, this must be addressed within the Plan.
NE4: Green infrastructure	Consideration needs to be given to the viability of developments as a result of these requirements and others in the plan. Clarification is required to explain what circumstance would necessitate contributions towards green infrastructure, sustainable transport, and gateway access points.
NE5: Green circle	Noted.
NE6: Urban greening factor	Noted. Consideration needs to be given to how this requirement will affect the density of development and as a result the housing numbers/employment achievable on each of the sites allocated by the Plan.
NE7: Urban tree canopy cover	Noted. Consideration needs to be given to how this requirement will affect the density of development and as a result the housing numbers/employment achievable on each of the sites allocated by the Plan.
HH1: Conserving and enhancing heritage assets	Noted and whilst supported, it must be recognised that Exeter is experiencing a significant shortage of both housing and employment land, such that it is important that this policy does not unnecessarily stifle development when impacts can be satisfactorily mitigated.
HH2: Heritage assets and climate change	Noted.
HH3: Conserving and enhancing Exeter City Walls	Noted.
C1: Protecting and enhancing cultural and tourism facilities	Noted.

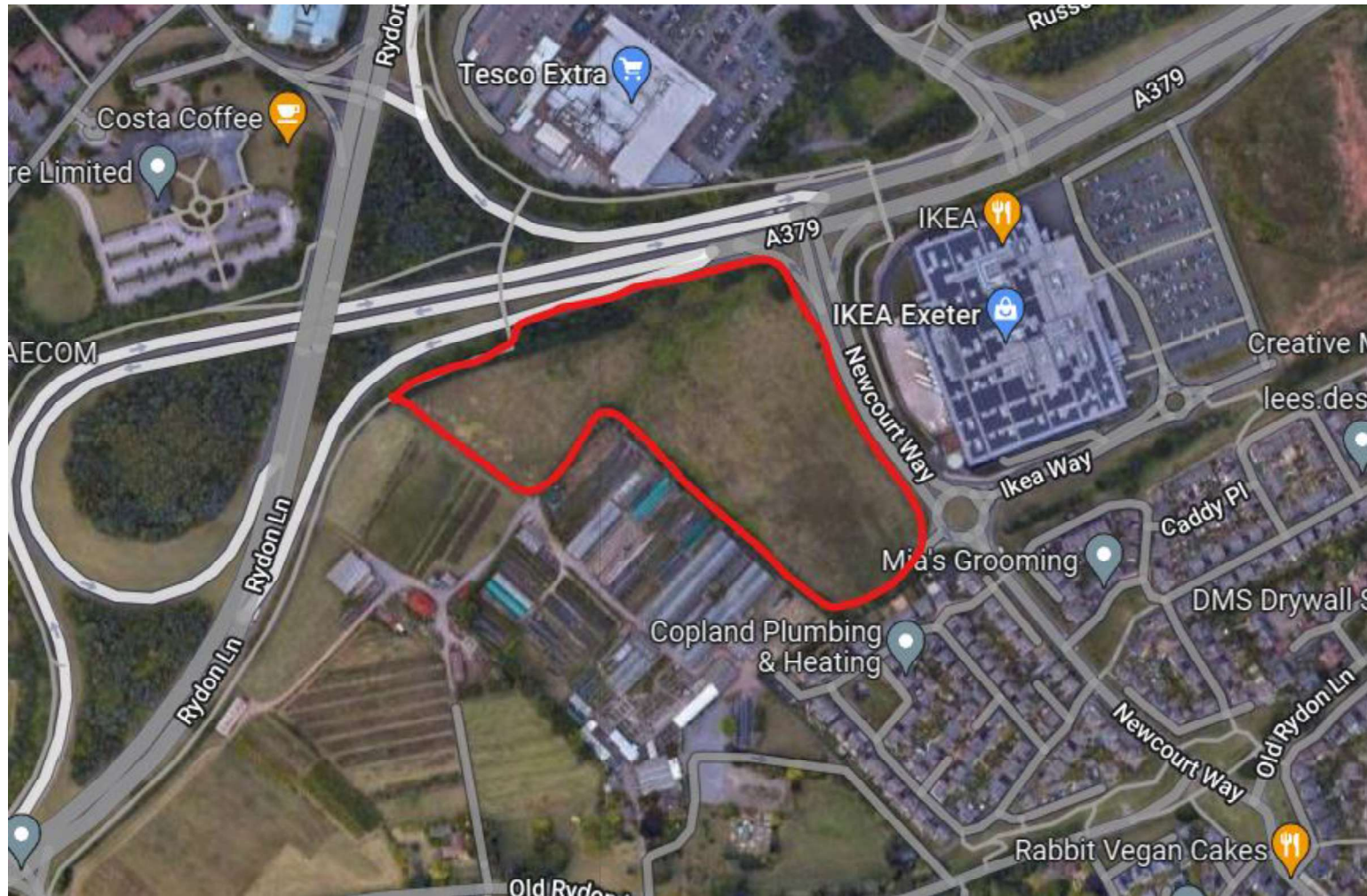
C2: Development and cultural provision	Noted. This policy refers to all large scale development proposals. Yet the supporting text at para. 11.15 suggests that cultural and tourism facilities should be provided as part of mixed use schemes. Clarification is required to confirm whether this is applicable to all large scale developments or just those mixed use schemes. If it is applicable to all large scale developments, particularly allocated residential developments, this will likely affect the capacity of the site to accommodate housing and this must be reflected in the Plan's housing allocation numbers. If this will result in a reduction in capacity, additional sites must be allocated.
D1: Design principles	This policy states that development proposals will be supported where they 'Contribute to the provision of a compatible mix of uses which work well together to create vital and viable places. This seems to be at odds with the proposed site allocations for the redevelopment of existing employment sites to include residential uses. Existing industrial uses (B2 and B8 uses) are unlikely to be compatible with residential uses yet a high proportion of the housing land supply relies on the redevelopment of existing employment sites. Further the policy states that development proposals will be supported where the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings.' However, paragraph 3.12 which relates to Liveable Exeter states that optimising density will often mean developing at densities above those of the surrounding area. The Plan doesn't demonstrate that these two aims/objectives are compatible.
D2: Advertisements	Noted.

HW1: Health and wellbeing	The policy states that ‘Developments will make financial payments towards improved health infrastructure commensurate with any additional demand placed on the existing provision.’ This requirement will need to meet the tests of planning obligations and requests well evidenced. Consideration needs to be given to the viability of developments because of these requirements and others in the plan. Large scale developments need to be defined within the Plan, with reference to policy and others within the Plan.
HW2 Pollution	Noted. Whilst policy HW2, which states that development proposals will only be permitted where they ‘will not place unreasonable restrictions on the future operation of existing businesses’, is noted, the implementation of this policy is likely to have implications for housing delivery on mixed use allocations. As such, these figures cannot be relied upon while, at this stage, the impacts on the future operation of existing businesses are unknown. This must be addressed through the allocation of additional sites to ensure the housing requirement for Exeter is met.
IC1: Delivery of infrastructure	The policy states that developer contributions will be sought through the community infrastructure levy and section 106 to ensure that the necessary physical, social, economic, and green infrastructure is in place to deliver development. Consideration needs to be given to the viability of developments because of these requirements and others in the plan.
IC3: Viability	Noted.

APPENDIX 2. CLIENT'S LANDHOLDINGS (SITES 89 and 140)



APPENDIX 3. OUR CLIENT'S LANDHOLDINGS (SITE 136)



APPENDIX 4. PLANNING STATEMENT (SITE 140)

Appendix 3:



Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

(For official
use only)

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

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

This form has two parts:

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

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

Part A: Personal details

1. Personal details*

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

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4



Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

Mr

First Name

James

Last Name

McMurdo

Job Title (where relevant)

Director

Organisation (where relevant)

McMurdo Land Planning and Development Ltd

Address Line 1

The Basement Office

Line 2

4 Baring Crescent

Line 3

Exeter

Line 4

Devon

Post Code

EX1 1TL

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

No

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

Please 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.

Policy H2 Housing Allocations and Windfalls

Proposed Policy H2 allocates land for new homes, listing these allocations under headings, strategic mixed use brownfield sites, large scale predominantly residential sites, major predominantly residential sites and minor residential sites. It notes that the principle of housing development on unallocated windfall sites in the urban area will be supported.

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

The land north and south of Old Rydon Lane is allocated as part of the Newcourt urban extension.

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. Our client owns that, too.

The HELAA assessment for Site 90, land at Rydon Lane, indicates a capacity for circa 550 dwellings. However, detailed consultancy input completed on behalf of our client, concluded that up to 170 homes and 190,000 sq. ft of commercial development on land adjacent to Sandy Park (Site 140), supplemented with strategic scale development on land to the south (Site 90), is achievable, viable and deliverable.

This technical input has considered existing and proposed developments, in particular, the scale and massing of the Marriott Hotel which would adversely impact the provision of any dwellings immediately west, responding to its context, potentially triggering costly blight and purchase order procedures, if the

allocation doesn't make best use of land in line with National and Local policies (and planning permissions).

The work has informed a Masterplan which would deliver high quality, much needed, development on an allocated site, by bringing forward a housing and employment led mixed use scheme with supporting local facilities, creating jobs within the Newcourt Urban Extension, all of which is enshrined in existing and emerging policies.

The Masterplan is Appendix 2.

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.

Current application number: 23/1532 and RTG application number 14/1451 refer, too.

Policy 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.

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above. You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

The plan 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.

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

Yes

☐

No

☐

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

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

Exeter is more than 2,000 houses behind in the current plan period ([See Authority Monitoring Report 2023-2024 here](#)) and doesn't have a 5 year housing land supply ([See Committee Agenda for Planning Committee here](#)). 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](#)) and a recent appeal ([See Appeal Decision here](#)) 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.

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

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

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

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

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

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

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

☐

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

Yes

☐

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

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

We would like to participate in the hearing sessions to elaborate further on the issues raised in these representations.

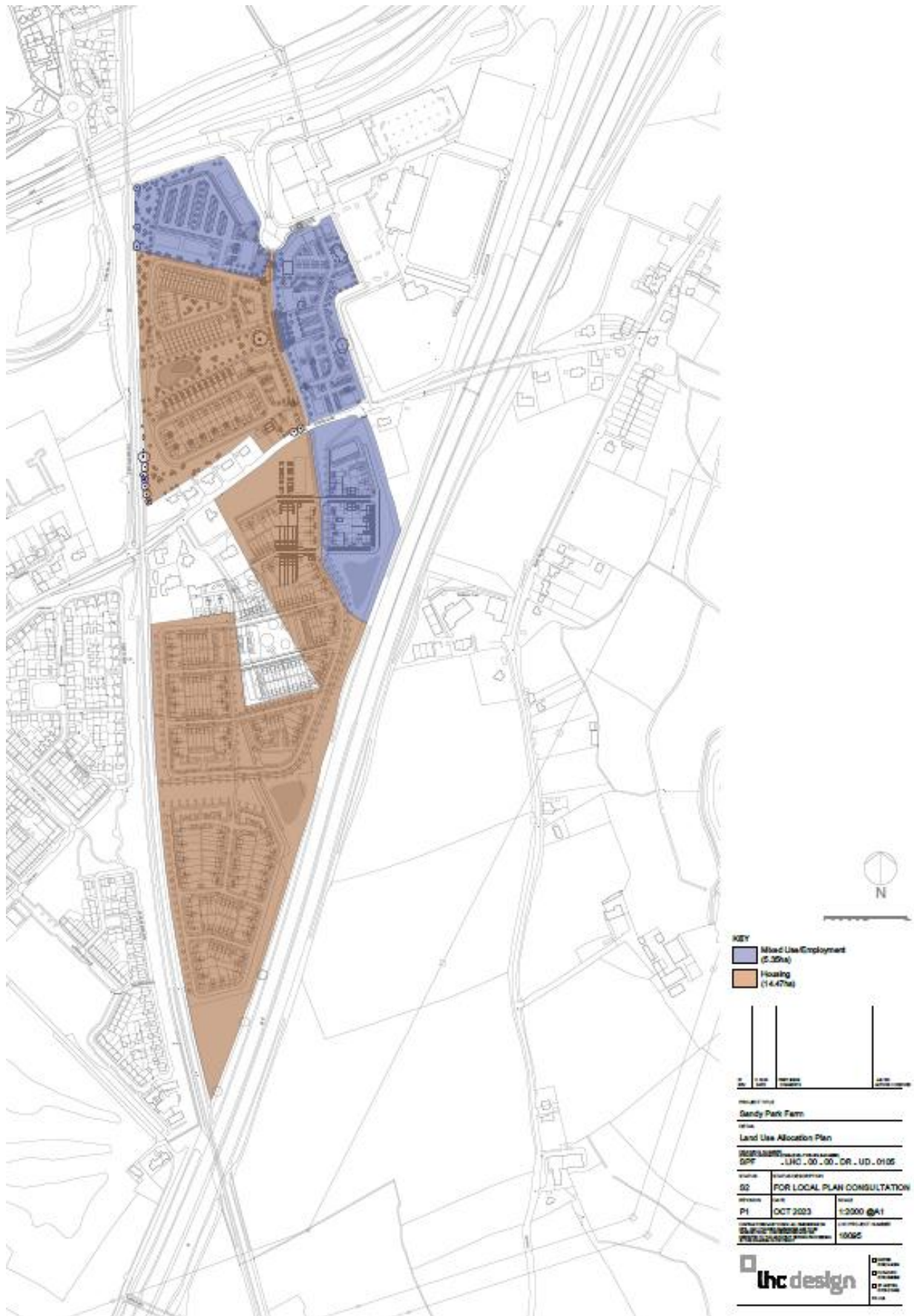
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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>

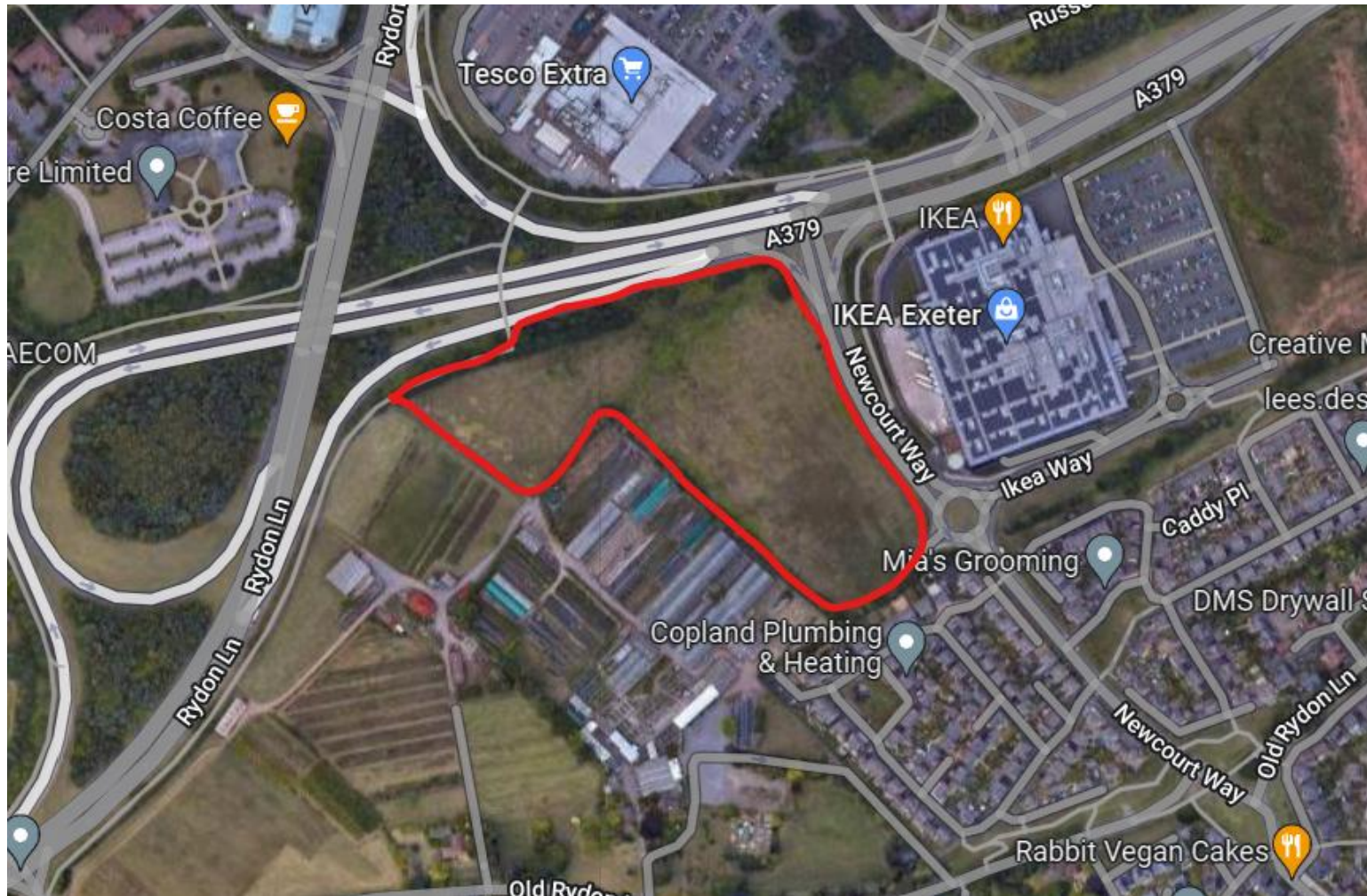
APPENDIX 1: Site 140, Land adjacent to Sandy Park and Site 90, Land at Rydon Lane



APPENDIX 2: Site 140, Land adjacent to Sandy Park and Site 90, Land at Rydon Lane – Masterplan



APPENDIX 3: Site 136, Land at Newcourt Way





Appendix 4:

From: [REDACTED]
Sent: 13 October 2025 15:30
To: James McMurdo
Cc: [REDACTED]
Subject: RE: "Transformational Employment Land" Evidence Local Plan

Hi James,

Yes, I think your email presents a fair summary of the Council's direction of travel, but I do think we need to be a bit careful in referring to 'emerging policy perspective' as this is not something defined in planning legislation, and the 'emerging plan' is the Exeter Publication Plan. Also, as I have already stated, this is something that will need to be considered by the Inspector at Examination.

Kind regards

[REDACTED]

[REDACTED]
City Development
Exeter City Council

From: James McMurdo
Sent: 13 October 2025 13:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: "Transformational Employment Land" Evidence Local Plan

Hi [REDACTED]

Thanks again.

So in simple terms:

- on a site identified for employment uses in the emerging Local Plan, if our client makes an application for planning permission for any of:
 1. Use Class B2 (general industrial)
 2. Use Class B8 (storage and distribution) and
 3. Use Class Eg (including Eg (i) offices, Eg (ii) research and development and Eg (iii) industrial processes)

that would be acceptable from an emerging policy perspective?

Thanks [REDACTED]

James

James McMurdo MRTPI MRICS

Director

McMurdo Land Planning and Development Ltd

a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL

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McMurdo Land Planning and Development Ltd

Registered in England and Wales Number: 10626969

Registered Office: 1 Colleton Crescent, Exeter, EX2 4DG

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From: [REDACTED]

Sent: 13 October 2025 12:22

To: James McMurdo

Cc: [REDACTED]

Subject: RE: "Transformational Employment Land" Evidence Local Plan

Hi James,

No, not exactly. The suggested modification, if taken forward as a Main Modification by the Inspector, would mean that the new employment allocations would be acceptable for those uses that meet the economic needs identified in the EDNA; so within Use Class B2 (general industrial), Use Class B8 (storage and distribution) and Use Class Eg (including Eg (i) offices, Eg (ii) research and development and Eg (iii) industrial processes).

This will need to be considered by the Inspector at Examination.

Kind regards

[REDACTED]

[REDACTED]

City Development
Exeter City Council

From: James McMurdo
Sent: 13 October 2025 11:59
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: "Transformational Employment Land" Evidence Local Plan

Hi [REDACTED]

Thanks for the speedy reply.

So in simple terms;

- on a site identified for employment uses will any E class use be acceptable ***from an emerging policy perspective?***

Thanks [REDACTED]

James

James McMurdo MRTPI MRICS
Director
McMurdo Land Planning and Development Ltd
a The Basement Office, 4 Baring Crescent, Exeter, EX1 1TL
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m
t



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From: [REDACTED]
Sent: 13 October 2025 11:50
To: James McMurdo
Cc: [REDACTED]
Subject: RE: "Transformational Employment Land" Evidence Local Plan

Hi James,

I can confirm that the Council is proposing a modification to the Publication Plan to ensure flexibility in meeting the employment needs of the city as identified in the EDNA and to remove the restriction that sites should be for transformational uses. This is presented in the 'Exeter Plan Schedule of suggested potential modifications' (key statutory document CSD-03):

https://exeter.gov.uk/media/oawb2a3x/csd-03_exeter-plan-schedule-of-suggested-modifications.pdf

The introduction to this document (page 2) explains how these suggested modifications will be dealt with by the Inspector.

I hope this helps provide further clarification.

Kind regards

■

■

City Development
Exeter City Council

From: James McMurdo

Sent: 13 October 2025 10:24

To: ■

Cc: ■

Subject: "Transformational Employment Land" Evidence Local Plan

Hi ■

"Transformational Employment Land" Evidence Local Plan

Hope you're well and that you had a great weekend.

The Local Plan evidence base refers, in particular, the attachment to this email which forms part of it.

Paragraph 3.5 of the attachment states:

*"3.5 The Publication Draft Local Plan does not indicate the amount of employment that could be accommodated on the three proposed employment allocation sites. It does state the sites are intended for transformational sector employment, and this is mostly in Use Class E(g) . However, a potential **modification to the Local Plan is intended and this would remove this restriction.**"* [my emphasis is yellow bold].

With this in mind, please can you confirm by return that.

1. It is the Council's intention to remove the restriction (i.e. remove the "transformational employment" (whatever that is) restriction).

in line with its own evidence base.

Thanks ■ and have a good week.

James

James McMurdo MRTPI MRICS
Director

McMurdo Land Planning and Development Ltd
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