

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

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

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

This form has two parts:

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

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

Part A: Personal details

1. Personal details*

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

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

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

Paragraph

Policy

Policies Map

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

Yes

No

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

(Continue on a separate sheet if necessary)

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

Yes

☐

No

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

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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.

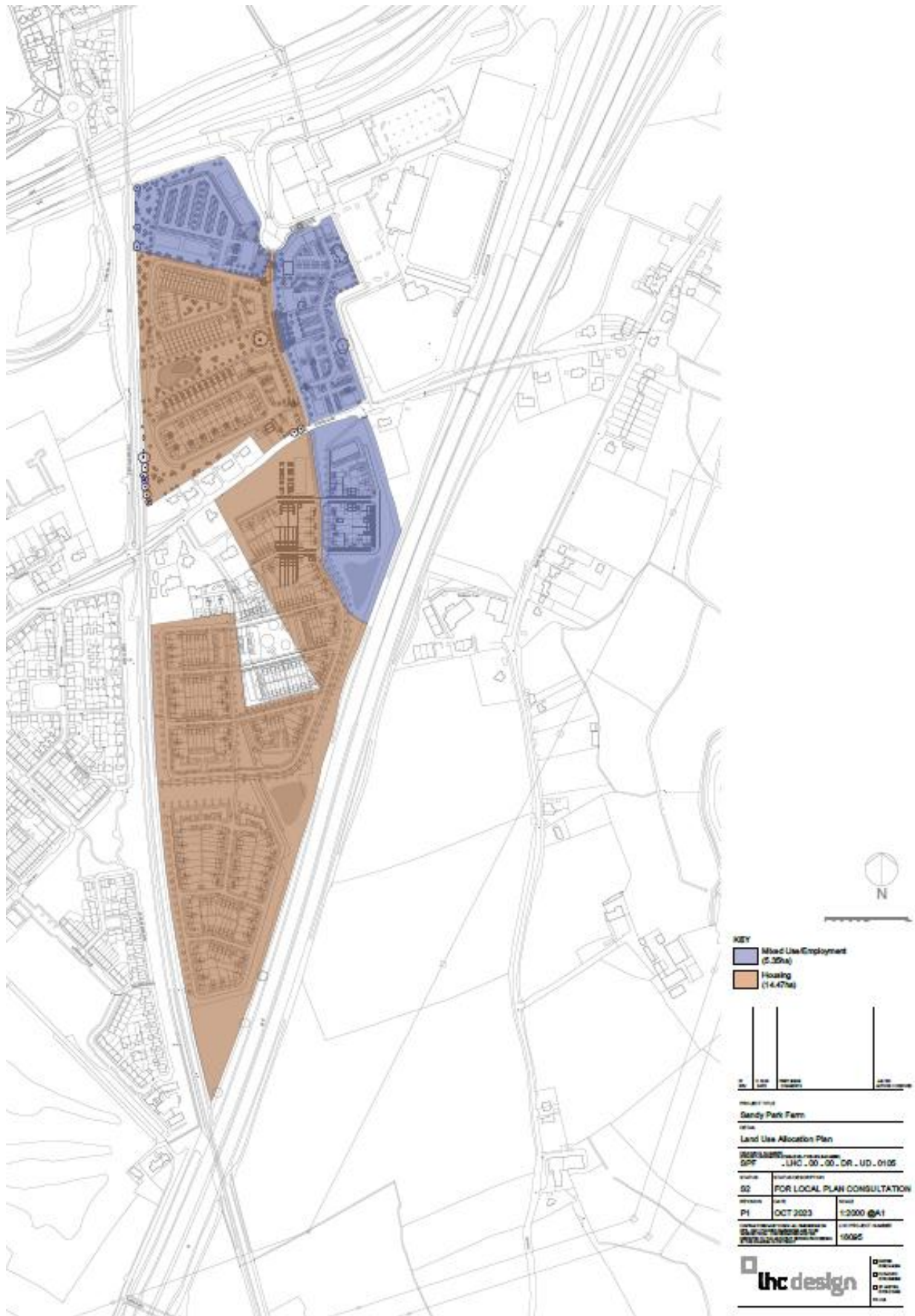
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

