

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

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

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

This form has two parts:

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

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

Part A: Personal details

1. Personal details*

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

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

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

Paragraph

Policy

Policies Map

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

Yes

No

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

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

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

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

Yes

No

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

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.
(Continue on a separate sheet if necessary)

The Plan is not sound because it is has not been positively prepared, is not justified by its evidence base justified, will not be effective and is inconsistent consistent with national policy. The reasons this are set out below.

We note with disappointment that the Publication Draft continues to include Policy NE1 without any change. We have outlined in detail previously the flaw in the approach of Policy NE1 and its similarity to the blanket approach towards landscape setting embodied by the previous saved policy of LS1 of the previous Local Plan. Policy LS1 has been found to be overly prescriptive, not in accordance with Government policy and out of date as a consequence through the appeal process.

Unfortunately, Policy NE1 continues with the same mistakes as LS1 and is likely to be the focus for future challenge, particularly considering the land supply challenges the Council will face. The approach is too reliant on blanket protection outside of the existing developed boundary of the city and does not take into account the nuances of landscape character and setting. As a consequence, by relying on the outdated perception of landscape setting within the 2022 Landscape Sensitivity Assessment (LSA) (which establishes its principle from the Exeter Fringes Landscape Sensitivity and Capacity Study 2007) the Plan overlooks realistic options for the release of land to help with the housing challenges.

These sites play no substantive role in respect of landscape setting despite being included in wider land parcels within the LSA. This approach fails to recognise the distinction between individual sites within the Landscape Setting Areas and the variety they have in different landscape impact and sensitivity. Instead it has been left for appeal Inspectors to breakdown this broad brush approach and recognise that selective release of land on the urban fringe is not inherently unacceptable from a landscape setting perspective.

We continue to urge the Council to delete this policy and to instead properly consider where development could be acceptable within the urban fringe and plan positively for it rather than face ad hoc appeal decisions. We set out below in respect of our Clients' sites at Barley Lane and Home Farm that there are suitable and available sites that can be delivered within the Landscape Setting Areas.

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)

Policy NE1 should be deleted as it is not justified and is inconsistent with national policy

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)

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:

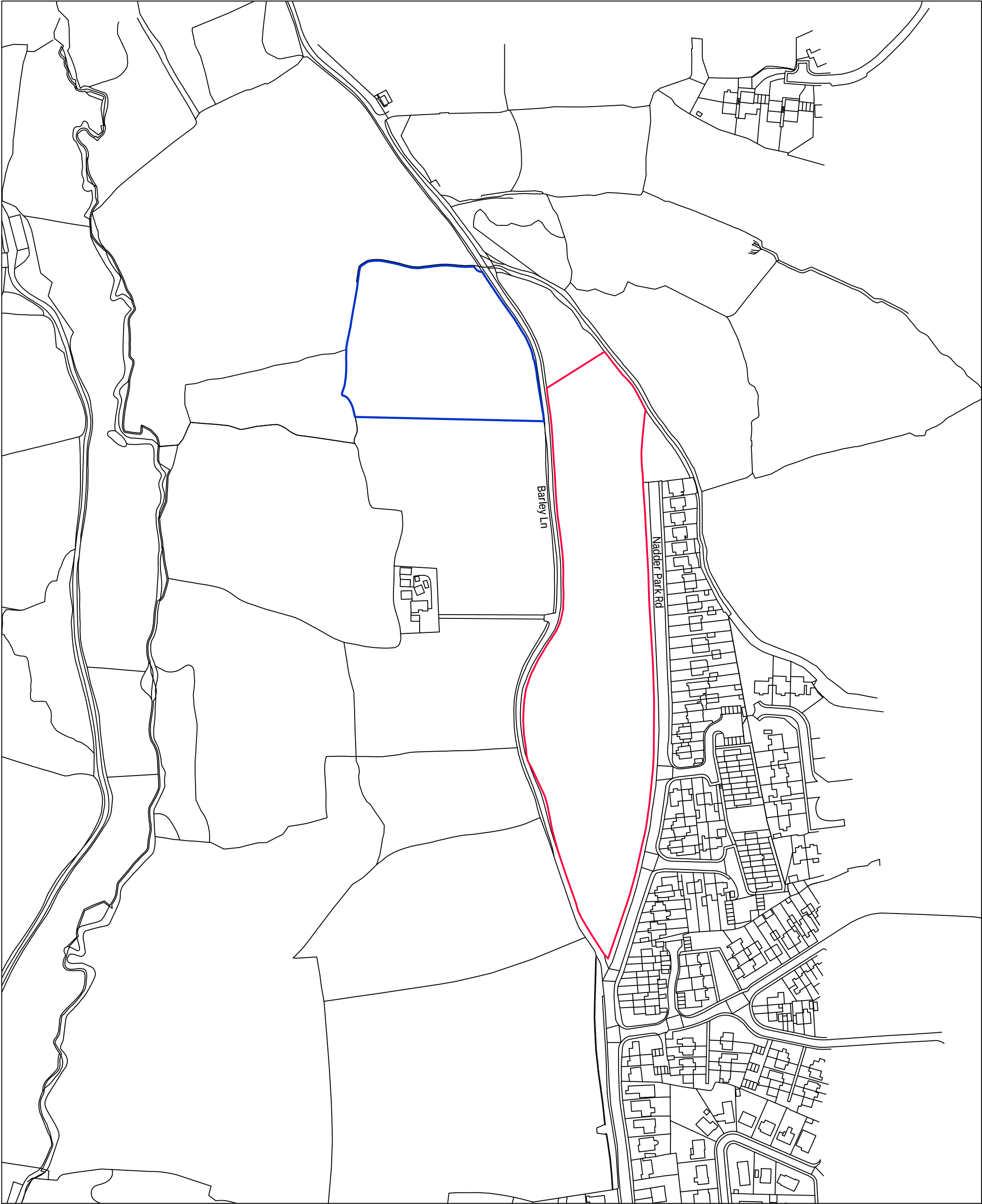
(Continue on a separate sheet if necessary)

In order to make our representations in respect of our clients significant concerns regarding the soundness of the Plan and the missed strategy and site opportunities.

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 A
Location Plan – Barley Lane, Exeter



- Application boundary
- Offsite area for Biodiversity New Gain requirements

BARLEY LANE, EXETER		-
LOCATION PLAN		SKH/DH
220720 L 01 01	1:2500/A3	FEB 2025

CliftonEmerydesign



Units House, 84 Longbrook Street, Exeter EX4 6AD
W: www.cliftonemerydesign.co.uk M

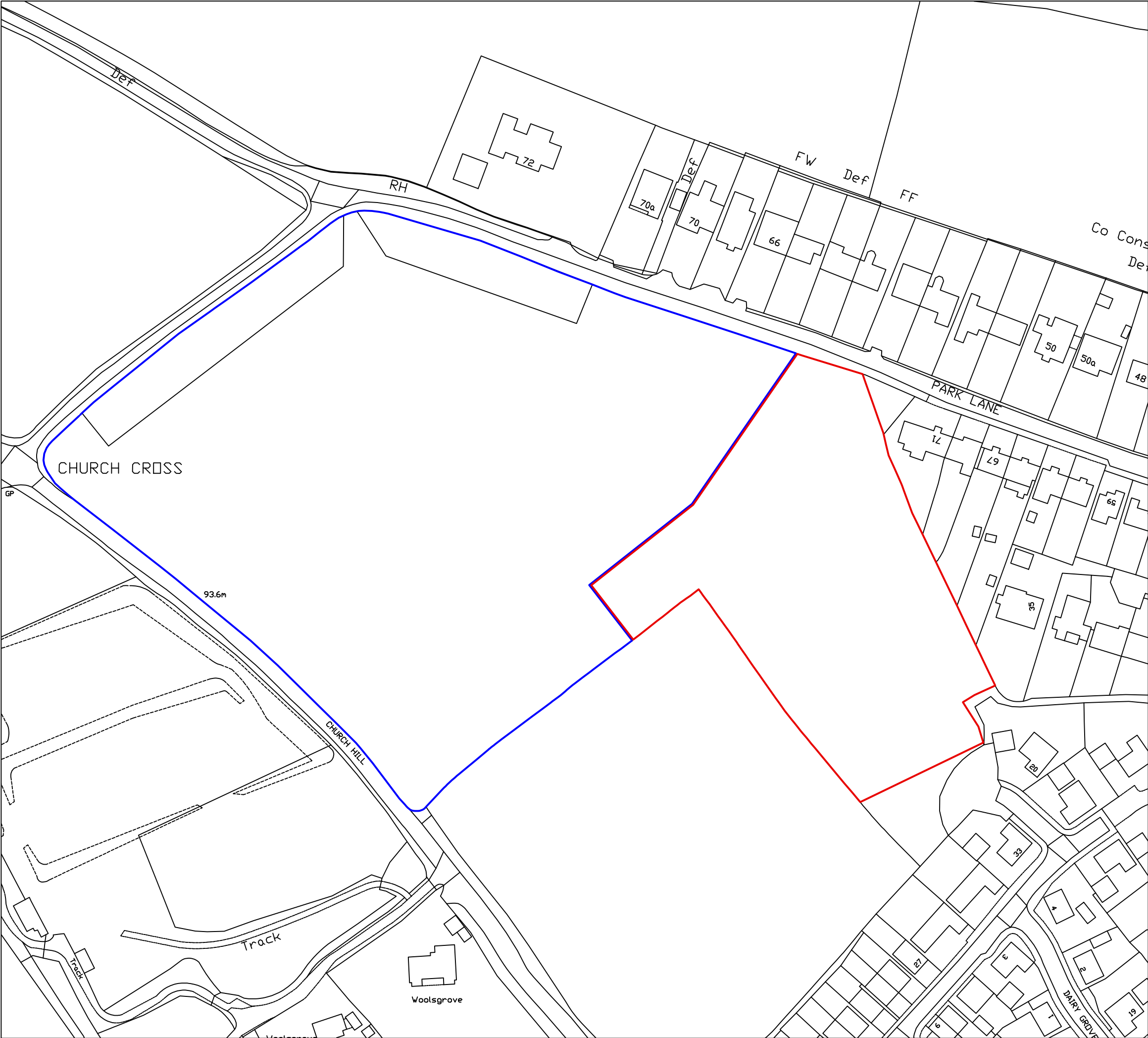
DRAWING STATUS PLANNING

10 120 140 160 180 100 m

1200 m

CONTRACTORS MUST CHECK ALL DIMENSIONS ON SITE. ONLY FIGURED DIMENSIONS ARE TO BE WORKED FROM. THIS DRAWING IS COPYRIGHT.

Appendix B
Location Plan – Home Farm, Pinhoe



NOTES

- Site boundary
- Land under client control

1010120130140150 m

100 m

REVNOTESDATE

Home Farm, Pinhoe

Location plan

231018 L 01 01

-

SKH / DH

Feb 2025

CliftonEmerydesign

Hems House, 84 Longbrook Street, Exeter, Devon, EX4 6AP
W: www.cliftonemerydesign.co.uk

DRAWING—STATUS Planning

CONTRACTORS MUST CHECK ALL DIMENSIONS ON SITE. ONLY FIGURED DIMENSIONS ARE TO BE WORKED FROM. THIS DRAWING IS COPYRIGHT.