

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 have previously raised concerns regarding the emerging plan's focus on ambitious policies seeking Net Zero by 2030 and the impact this has on the viability of development. This challenging ambition needs to be grounded by the imperative to tackle fundamental need for housing in Exeter. We remain concerned that the Publication Draft plan includes a number of 'Climate Change' policies which, in some instances, may negatively impact the ability to deliver development around Exeter.

Proposed Policy CC5 introduces a significant change in position regarding carbon dioxide emissions for buildings. It requires all new residential development to achieve a minimum of 75% emission reduction from that required under 2013 building regulations. The inclusion of this policy is justified in paragraph 5.24 on the basis that the forthcoming Future Homes Standard and Future Building Standard will require this level of uplift. However, this is not yet confirmed and it is clear from the evidence base that the policy approach relies on the consultation draft of the Future Homes Standard.

We are not aware of any subsequent updates on the FHS that clarifies the government's details around reductions in carbon emissions. Therefore, the 75% reduction goes beyond current or planned building regulations, in being contrary to the Written Ministerial Statement of 13 December 2023 (ref. UIN HLWS120) by Baroness Penn, which states: "The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.

The WMS goes on further to state that: "Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."

It is not clear from the evidence base how the policy approach of CC5 can be justified in this context. We would suggest the policy is in any case unnecessary as it duplicates forthcoming Building Regulation changes.

Policy CC9 (Water Quantity and Quality) appears to be an attempt to discharge South West Water's statutory duty for maintaining water quality and placing responsibility on to the development industry through what appears to be a quasi-nutrient neutrality policy. This is not reasonable or necessary.

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)

Policies CC5 and CC9 should be deleted from the Plan

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

☐

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

Yes

☐

hearing
session(s)

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

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

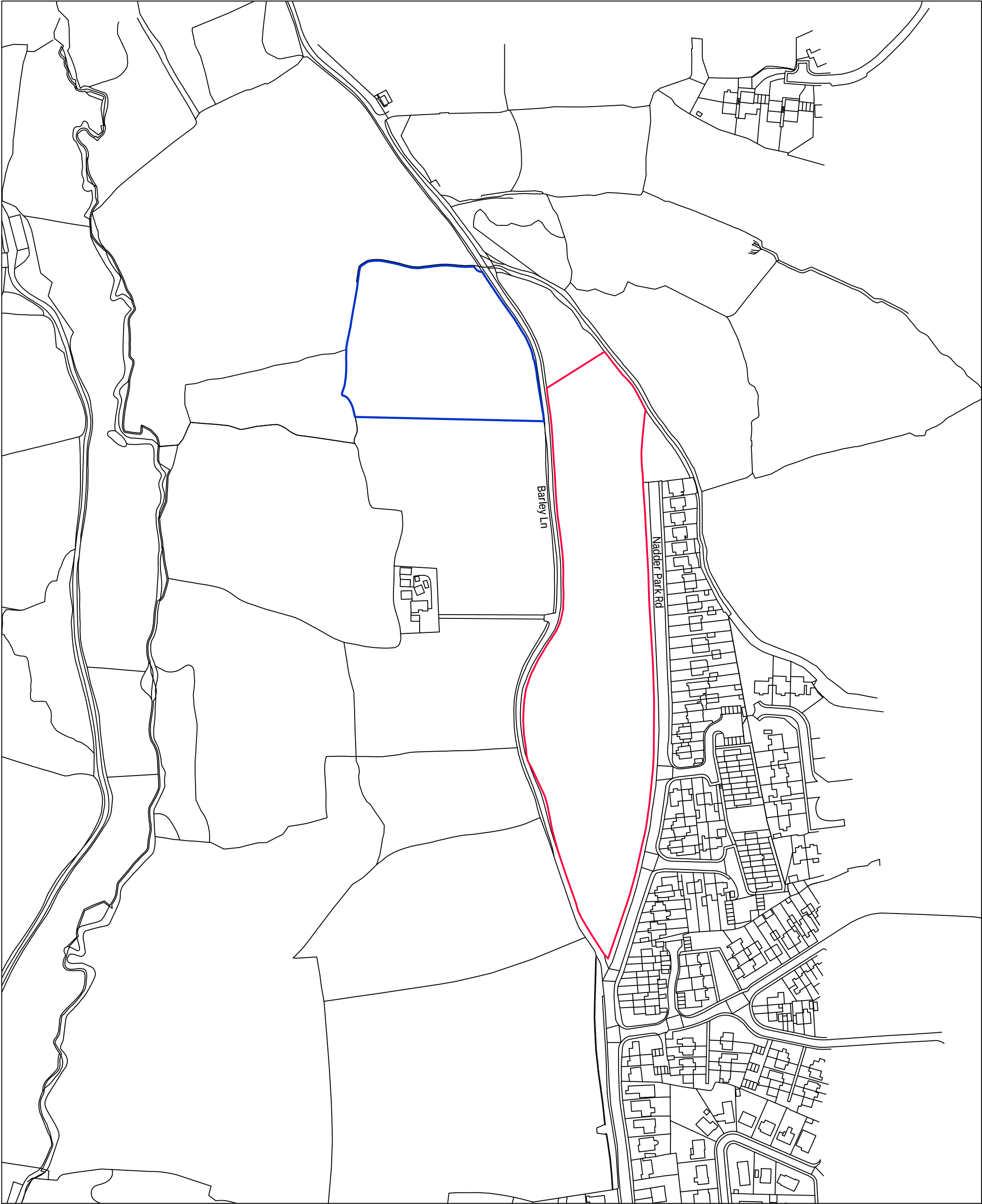
(Continue on a separate sheet if necessary)

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



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W: www.cliftonemerydesign.co.uk M: [REDACTED]

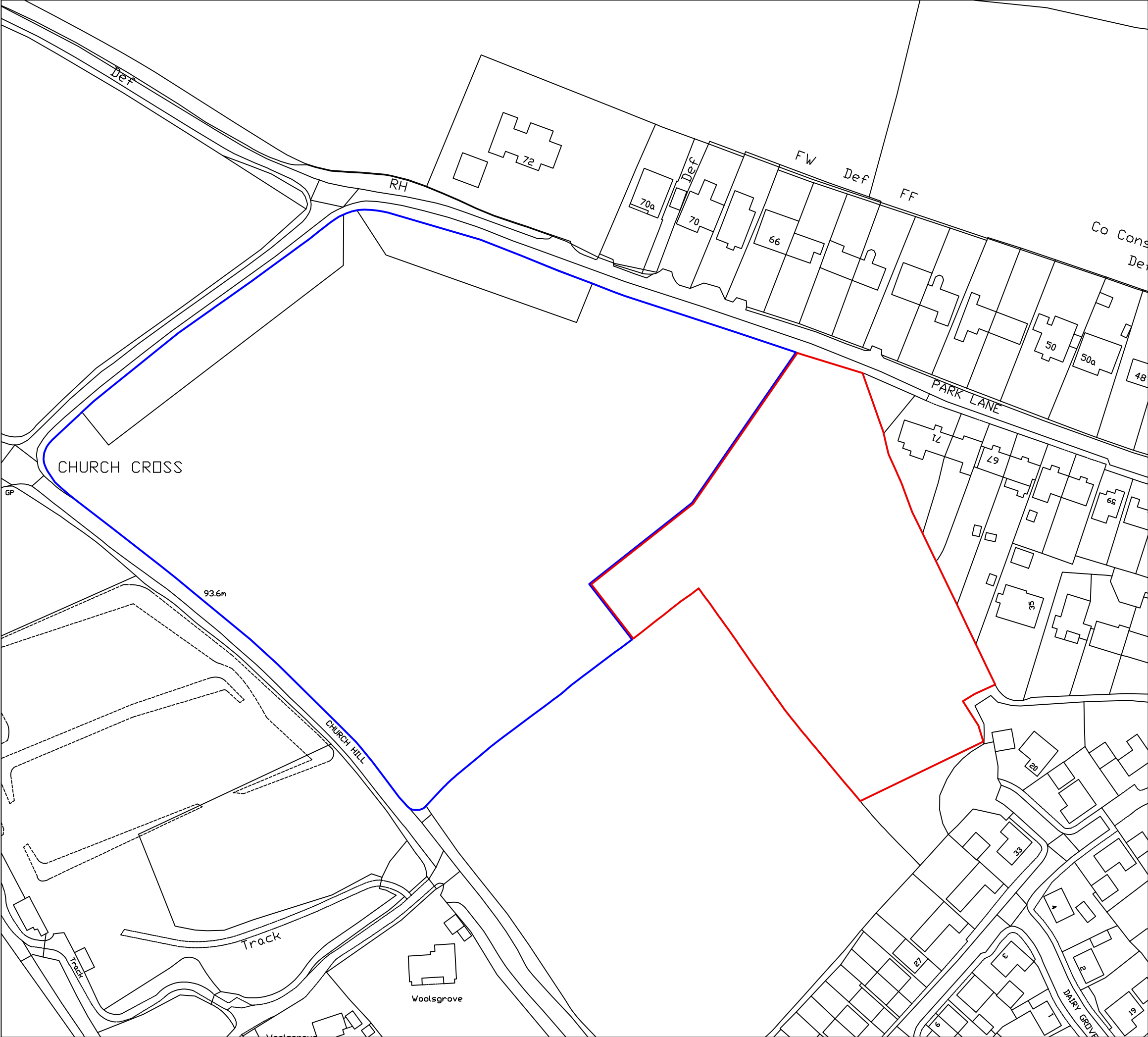
DRAWING STATUS PLANNING

10 120 140 160 180 100 m

1200 m

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Appendix B
Location Plan – Home Farm, Pinhoe



NOTES

- Site boundary
- Land under client control

1010120130140150 m100 m

N

REV	NOTES	DATE
Home Farm, Pinhoe Location plan		- SKH / DH
231018 L 01 01	1:1250/A3	Feb 2025

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DRAWING—STATUS Planning

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