

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.

Policy EJ1 Economic Growth

Policy EJ1 suggests that development proposals will be supported where they meet the economic needs of the city identified by the Economic Development Needs Assessment (EDNA).

The EDNA (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 and that there is limited scope for more employment land in the city beyond that identified. It confirms that some of the demand stimulated by the city's economy will need to be accommodated in its hinterland, in adjoining local authority areas.

Despite the recognised demand for industrial development within the EDNA, policies EJ1 (and EJ6) focus its support on the transformational sectors. Despite the clear need for industrial employment land identified within the EDNA, the proposed policies and allocations do not explicitly encourage, support or allocate land for new industrial development. 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 potential to result in a net loss of employment land in Exeter.

As evidenced by the EDNA, there is a substantial and demonstrable shortfall in industrial employment land, particularly for logistics across the sub-region and this is highlighted in a recent appeal decision in East Devon. Appeal reference APP/U1105/C/22/3295011 for land at Hill Barton, Sidmouth Road, Clyst St Mary refers to an application for HGV parking.

This appeal decision refers to the East Devon Economic Land Review published by EDDC in October 2023. The Economic Land Review indicated current demand for over 50ha of employment space, of which 80% relates to the logistics sector. In contrast, the Review indicated that only 1.7ha, of which over 70% is office space, is available. It continued that, over the period 2019-2040 demand for employment space in East Devon was expected to be nearly 130ha, of which over 123ha would be for industrial and logistics

space. In contrast, current and future supply over that period was anticipated to be approximately 87ha, indicating a shortfall of 43ha at the end of period 2019-2040.

The Inspector highlighted, that logistic businesses need locations with good access to the road network, and in this part of Devon, this means that demand is focused on Exeter and around the M5. The decision recognised that the west part of East Devon is located within that market area with potential sites for development to meet the needs of logistics operators being both within and outside of East Devon. EDDC accepted, in response to the appeal, that more land needs to be found for logistics operators.

The Inspector concluded that there is a demonstrable and significant shortfall in the provision of employment land in the area around Hill Barton Business Park, particularly for logistic operators and that this must carry significant weight in the planning balance. [See Appeal Decision here.](#)

The EDNA acknowledges that there is limited land available in Exeter to meet the demand stimulated by Exeter's economy, and that land will need to be found in neighbouring authorities. This appeal decision and East Devon's own evidence acknowledges that the West End of East Devon is well located in the market area to meet the employment needs of East Devon and neighbouring authorities.

As above, the evidence suggests that Exeter cannot meet demand for employment land supply within its administrative area. Therefore neighbouring authorities must, under the Duty to Cooperate, allocate land to meet its needs and those of neighbouring authorities where needs cannot be met within its plan area. In the case of both employment land and housing land, the West End area of East Devon is best placed to meet Exeter's need/demand.

ECC and EDDC (and arguably other administrative areas) are failing in their Duty to Cooperate. The Exeter Plan needs to address the shortfall in housing and employment land supply either by allocating additional deliverable land within its administrative boundary to meet Exeter's need or alternatively if this is not possible it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the housing and employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces.

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 Exeter Plan needs to address the significant and demonstrable shortfall in employment land supply recognised by the EDNA either by allocating additional land within its administrative boundary to meet Exeter's need or alternatively if this is not possible (which as evidenced by the EDNA is highly likely) it must successfully engage in the Duty to Cooperate and formally make a request to EDDC (and other administrative area) to assist in meeting the employment needs of Exeter.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) development needs broadly in line with the issues the subregion faces.

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.

Para. 7.6 of the Exeter Plan states that *'the partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to continuing to work together, in accordance with the duty to cooperate, to address any shortfall in employment land to ensure the continued economic success of the wider area'*.

However, EDDC propose to object to the Exeter Plan as set out in a report to the EDDC Strategic Planning Committee on the 4th February 2025 ([See EDDC Report SPC here](#)). The objection is on the basis that it fails to make available sufficient land for employment provision. EDDC Officer's recommended response recognises that the Exeter Plan does not refer to the Exeter specific employment land requirement nor how the Exeter Plan has addressed this need. It notes that the Exeter Plan fails to state that it will meet an Exeter quantified need and that *'no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land need identified in the EDNA. The land identified in the emerging East Devon Local Plan 2020-2042 is considered to be necessary to meet the needs of East Devon and does not seek to address wider needs.'*

Whilst not explicit in the Exeter Plan, as suggested by EDDC, the Exeter Plan appears to rely on the collective land supply for employment across the sub-region, without formal request under the duty to

co-operate. ECC (and arguably other authorities in the sub-region) are failing in their duty to cooperate and this must be addressed for the Exeter Plan to be found sound.

Our Client's land is suitable and available to meet Exeter's (and East Devon's) needs broadly in line with the issues the subregion faces

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

Yes

hearing
session(s)

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)

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>

APPENDICES



