

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

Ms

First Name

Helene

Last Name

Jessop

Job Title (where relevant)

Conservation Officer

Organisation (where relevant)

RSPB

Address Line 1

Broadwalk House

Line 2

Southernhay West

Line 3

Exeter

Line 4

Post Code

EX1 1TS

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)

The RSPB supports the requirement to maximise provision for urban biodiversity ("***Integrating biodiversity into the built environment: Developments should be designed to reduce the impact of urbanisation on biodiversity by creating space for wildlife in the built environment. The term 'wildlife' includes all living organisms, ranging from plants to birds, mammals to lichens, fungi and invertebrates. Proposals must increase the abundance and diversity of wildlife.***")

However, we are concerned that reference solely to "The Residential Design Guide Supplementary Planning Document provides helpful guidance, including in relation to bat and bird box provision," is not sufficient, given its age.

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)

RSPB is concerned that the Residential Design Guidance SPD is now out of date and does not provide the best current information re urban wildlife provision. Therefore the RSPB recommends that the SPD is revised so that it accords with the latest guidance referenced below, and that the current reference to the Residential Design Guidance SPD is amended to "and more recent guidance including BS 42021:2022 and the Future Homes Hub's *Homes for Nature Guidance Document* (current edition October 2024).

In the RSPB view, that the Exeter Plan contains reference to a guidance document that is now out of date means Exeter City Council's planning policy here and related decisions risk not providing net gains for biodiversity as required by the National Planning Policy Framework (chapter 15) in relation to incorporation of features "*which support priority or threatened species such as swifts, bats and hedgehogs*". The RSPB considers it reasonable to amend the reference to the SPD to specifically also refer to more up to date guidance.

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)

While RSPB understands that the Biodiversity Requirements of Exeter's Residential Design Guide SPD adopted in October 2010 will still apply to all new Planning Applications in the city, the Guide is now nearly 15 years old and the criteria of best practice have moved on. They are now included in the NHBC's [biodiversity-in-new-housing-developments.pdf \(nhbc.co.uk\)](https://www.nhbc.co.uk/biodiversity-in-new-housing-developments.pdf) (2021), the **British Standards Agency's new** Standard for integral nest boxes BS 42021:2022 published on 30/03/22) and more recently the [Future Homes Hub-https://www.futurehomes.org.uk/#Members](https://www.futurehomes.org.uk/#Members) (with details of proposed biodiversity enhancements by a significant number of National Housebuilders who have committed to include them in all their new developments starting in September 2024).



[Future Homes Hub Home](http://www.futurehomes.org.uk)

The Future Homes Hub brings together the partnerships needed to deliver on the new home sector's climate and environment plan.

www.futurehomes.org.uk

BS42021:2022 - Para 8.4.2 Larger buildings - Integral nest boxes — Selection and installation for new developments — Specification

Larger buildings occur in many types and sizes and serve a number of purposes and uses. These include: commercial offices, residential apartments, commercial offices, libraries, educational buildings, nursing/ care homes and hotels and student accommodation, etc. The type and purpose of building could determine how many integral nest boxes are either appropriate or can be installed. The number of installed integral nest boxes in larger buildings depends upon the building construction. Glass-clad buildings might have no opportunities because of the material and the danger it presents to the birds. Some modern claddings could restrict opportunities. **The number of integral nest boxes to be installed shall be proportionate* to the size and design of the building.**

NOTE 1 There is not necessarily an upper limit to the number of boxes that can be installed.

NOTE 2 Although it is unlikely that all boxes on a site will be occupied at the same time it is very likely that all boxes will be used at some point in the lifespan of the Building."

A significant number of recent developments in the above categories completed in Exeter since 2010 have incorporated integral Bird Boxes/Bricks and we understand that the "Future Homes Hub" will include similar projects in the next edition of their "Guide" for their members to follow, see Homes for Nature Guidance document on [Homes for Nature](#) these meet current criteria of good practice and would comply with the ECC's Biodiversity Design Guide, _

With reference to integral nest boxes, we recommend using the "universal variety", see [universal swift nest brick02.pdf](#) designed for swifts but used by most bird species that nest/roost in buildings.

We recommend that the all the relevant criteria for future developments in the City are included in the new "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 hearing session(s)

☒

Yes, I wish to participate in 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)

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>