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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)

Soundness: consistency with national policy.

NPPF (Dec 2023) requires Local Plans and the determination of planning applications to be proactive in providing resilience and adaptation in the face of climate change (paras 157, 158, 159) . Policy CC7 is welcome in tackling this requirement, but appears to be incomplete in it's focus on relevant issues, which are in fact specified earlier in the draft Plan, at Policy CC1h. That Policy (CC1) deals with emissions reduction, and rightly recognises that the provision of green infrastructure and improvements in biodiversity can aid emissions reduction by providing and improving carbon sinks. However, these issues can also have a considerable role in aiding adaptation and resilience, and as such should also have prominence in Policy CC7, above and beyond the sole requirement for '*... integrating biodiversity into the built environment...*' (which does not adequately cater for improving biodiversity in both the built and the natural environment).

As set out in our representation on Policy CC1, there also needs to be clarity over what is meant by '*...landscape-led schemes...*' in order to determine whether they are relevant for CC1 and, or, CC7.

Policy CC7 also currently includes a requirement to retrofit renewable energy technologies. While this is consistent with national policy, Policy CC7 does not seem to be the appropriate place for it. It does not seem to relate directly to national policy on adaptation and resilience, and would be better placed in a part of the Plan that relates to national policy on mitigating climate change – reducing emissions – unless the relevance to adaptation and resilience is explained (perhaps in relation to energy security? Or providing for air conditioning in the face of increasing temperatures?) Policy CC1, which deals with mitigating climate change through emissions reduction, does in fact include a requirement relating to renewable and low carbon energy generation: it could be made clear at that point that the requirement relates to retrofitting existing buildings as well as to provision in new build.

The coverage of Policies CC7 and CC1 is therefore confusing, as each contains elements that would seem more applicable to the other: it is possible that this confusion could affect Policy delivery, so it would make sense for there to be a re-working of the content and wording of each.

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)

Modification to improve consistency and deliverability:

- add the following requirement: x providing green infrastructure
- amend requirement c to read ...improving biodiversity and integrating it into the built environment.
- Add wording to explain the role of renewable and low carbon energy generation in providing adaptation and resilience; or if there is no role, ensure this issue is covered within a more appropriate Policy topic.
- Include discussion, explanation and a requirement relating to '*...landscape-led schemes...*' (See Policy CC1), if these are relevant for achieving Policy CC7.

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)

No

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.

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