

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	Miss
First Name	Lorna
Last Name	Henderson
Job Title (where relevant)	Director
Organisation (where relevant)	Eutopia Exeter Arches Ltd
Address Line 1	The Stables, Little Coldharbour Farm
Line 2	Tong Lane, Lamberhurst
Line 3	Tunbridge Wells
Line 4	Kent

Post Code

TN3 8AD

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)

We support the housing allocation (Ref 163) of 'Mary Arches Multi-Storey and Surface Car Park'.

We note that under draft policy H2 the 'number of homes' that the site can deliver is identified as 154 units. At this stage this should be noted as a 'minimum capacity' for the purposes of delivery targets (Ref: Policy H1). The development potential of identified sites, should, of course, only properly be judged as part of the development management process through the submission of a planning application and as such a capped threshold approach should not be identified in the policy.

Whilst a plan-led approach is necessary in order to set the parameters for development, any allocation should be flexible in terms of capacity (i.e. minimum) and not preclude making the best use of vacant, brownfield sites to be 'consistent with national policy'.

Such sites should be able to provide for a variety of unit types. It is noted at paragraph 6.37 of the draft plan that 'co-living will count towards Exeter's housing requirement. In this regard, Policy H2 should also recognise other forms of delivering the Council's housing need and requirements. For example, in the case of 'Mary Arches Multi-Storey and Surface Car Park' this has been explicitly recognized as having potential of delivering Co-living units'. Cross reference to Policy H6 is necessary for the plan to be 'positively prepared' and be 'consistent with national policy'.

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)

Number of homes heading should be annotated: 'indicative minimum site capacity'

Policy should cross reference Policy H5 'Build to Rent' and H6 'Co-living housing'.

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)

It does not meet the tests of soundness as set out in para 36 of the NPPF; namely 'positively prepared and 'consistent with national policy' (see section 4b)

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)

See section 4c

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)

x

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>