



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	Phyllida
Last Name	Brown
Job Title (where relevant)	
Organisation (where relevant)	On behalf of Prospect Park Residents' Association
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	Pages 19-21 Inset	Policy	S2 Liveable Exeter Principles – Principles 3 Welcoming Neighbourhoods, and 7.	Policies Map	
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4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes		No	x
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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)

I refer to S2 Liveable Exeter Principles: Principle 3, Welcoming Neighbourhoods, pp 19-20 and Principle 7, p21. The St James Neighbourhood Plan is cited prominently in the Exeter Plan (on p9) as a key example of neighbourhood planning that allows an area to 'keep its distinct identity and continue to serve its citizens' needs'. However, a key principle of that neighbourhood plan, the maintenance of **community balance**, set out in saved Policy H5 b, **has been removed** from the Exeter Plan. Community balance allows resilient neighbourhoods with diverse residents at all stages of their lives. The removal of the principle of community balance is at odds with the Exeter Plan's Principle 3 and also appears at odds with Principle 7: 'Create resilient, adaptable, networked communities and successful centres that support civic pride and express local identity'. Our specific concern is that this removal has taken place without, to our knowledge, any formal discussion with residents or recognised residents' associations or the Exeter St James Community Trust. We understand further that there has been no discussion with our local councillors nor have members of Exeter City Council been allowed any form of scrutiny of the published draft of the plan.

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)

We would request that Principle 3 should include an additional statement:
Proposed developments will not create an overconcentration of the proposed use in any one area of the city which would change the character of the neighbourhood or create an imbalance with detrimental impact on the sustainability and resilience of the community.

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

☐

No

x

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)

Whereas we appreciate that the published draft of the Exeter Plan refers at various points to the increase in PBSAs and co-living, linked largely to the University, the Plan fails to address the issues of the impact of community imbalance in regard to residential communities within Exeter. Regarding HMOs the Local Planning Authority has recently updated its policies following representations from residents from parts of the city that had not previously encountered HMO applications but are now affected, as St James has been for years. The main argument used to justify the application of an Article 4 Directive was that of maintaining community balance based on a 20% figure leading to an imbalance in any given postcode area. It therefore seems perverse that while clarifying the definition

of community imbalance within Article 4, the reference to community balance has been removed from the Exeter Plan. No such determination to remove the former H5b has been discussed or agreed, as we understand it, by elected members. Community balance was a key factor in the refusal of a recent planning appeal 23/0652/FUL, refused by the Planning Appeals Inspector for the same reason.

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)

We would request the reinstatement of the principle of community balance as above, to avoid an overconcentration of HMOs, PBSA or Co Living in any area to ensure sustainable communities.

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)

We wish to see the principle of community balance restored to ensure that our city and neighbourhood is sustainable for its children's futures. As a residents' association we support appropriate, sensitive, sustainable development in line with housing need for people at different stages of their lives and for affordable family homes. We favour development that complies with net zero requirements and is fit for our climate emergency. Thank you.

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>