

# 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](mailto: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

Mr

First Name

Harry

Last Name

Cooper

Job Title (where relevant)

Land Manager

Organisation (where relevant)

Strongvox Homes Ltd

Address Line 1

Line 2

Line 3

Line 4

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Post Code

Telephone number

E-mail address

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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)

Please refer to attached letter

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)

Please refer to attached letter

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)

Please refer to attached letter

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)

Please refer to attached letter

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 refer to attached letter

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)

Please refer to attached letter

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)

Please refer to attached letter

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 refer to attached letter

**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)

N/A

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)

N/A

**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)

It will be necessary to attend the hearings if there are any objections to the proposed allocation of site reference 153.

**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>

Planning Policy  
Exeter City Council  
Local Plans Team  
Civic Centre  
Paris Street  
Exeter  
EX1 1JN

Date: 06/02/2025

Letter ref: CP/00763

Dear Sir/Madam,

**Representations to the Exeter Plan 2021-2041 Publication Stage (Regulation 19) Consultation**

These representations to the Exeter Plan 2021-2041 Publication Stage (Regulation 19) Consultation are made on behalf of Strongvox Homes Ltd who control the land at Newcourt Road, Topsham shown outlined in red on the plan below. Strongvox have recently submitted a planning application for residential development of 23 dwellings (including 35% affordable housing), access from Newcourt Road and associated works on the site ref: 24/1425/FUL.



## Plan Making Requirements

These representations have regard to the National Planning Policy Framework (NPPF) which requires local planning authorities to ensure that all policies are evidenced by up-to-date information. Paragraph 31 states,

*‘The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals’.*

Paragraph 35 of the NPPF explains that plans will be examined to determine that they are sound. Plans are sound if they are,

- (a) Positively prepared - providing a strategy to meet the area’s objectively assessed need,
- (b) Justified - an appropriate strategy, taking account of reasonable alternatives and based on proportionate evidence.
- (c) Effective – Deliverable over the plan period and based on effective cross boundary working, and
- (d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy.

## Proposed Urban Boundary

The site is shown as falling within the proposed Urban Boundary. The site falls within the ‘Strategic Gap’ allocation on the current Local Plan Proposals Map which has not been carried forward on the new plan. The inclusion of the site and surrounding area within the Urban Boundary and the deletion of the ‘strategic gap’ is supported having regard to its sustainable location, the recent development in the area since the previous plan was adopted, and the limited contribution the site and the surrounding land make to the landscape setting of Topsham and Exeter.

## Site Allocations

The site is proposed to be allocated for residential development of 45 homes (site reference: 153) under draft **Policy H2** which is supported. The site is within a sustainable location within 1km of a variety of services and facilities within Topsham and the local train station and bus stops are located approximately 0.6km from the site. The technical work undertaken on the site in support of the current planning application confirms that it is suitable for residential development. The

allocation of the site for residential development would reduce the reliance on windfall development for meeting local housing requirements generally.

#### Other Relevant Policies

Draft **Policy CC5** requires that from 2025 residential development will achieve a 75% carbon dioxide emissions reduction from that required under the 2013 Building Regulations. This requirement aligns with the Government's intention to introduce the mandatory Future Homes and Building Standards in 2025. Whilst we support the objectives of the policy, we recommend that the policy requirement only becomes mandatory once it has been implemented by the Government to ensure that the policy is both justified and effective. This would assist developers in adapting to the new requirements in line with the Government's timetable.

#### Summary

The new Urban Development boundary around Topsham is supported in light of the changes to the area since the previous Local Plan was adopted. The proposed allocation of site reference: 153 for residential development under draft Policy H2 is also supported as it is a logical site for development and would contribute towards meeting the housing requirement for the area. The draft Plan is considered to be positively prepared in this respect.

We trust that these representations will be taken into account. If you require any further information at this stage, please do not hesitate to contact us.

Yours faithfully,

**CATHERINE KNEE**

**Associate Director**