

EXETER LOCAL PLAN 2021-2041
PUBLICATION STAGE (REGULATION 19)
DECEMBER 2024

REPRESENTATIONS

PREPARED ON BEHALF OF

GROWEN ESTATES LTD



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RA Ref: CONS0016

LPA Ref: -

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Date of Issue: February 2025



SECTION 1

REPRESENTATION FORMS_PART A

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

Mr

First Name

P

Last Name

Scoble

Job Title (where relevant)

Director

Organisation (where relevant)

Growen Estates

Address Line 1

c/o Agent

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



SECTION 2

REPRESENTATION FORMS_PART B



Paragraph 8.14

District and Local Centres



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)

Failure to identify land north of Honiton Road, west of Fitzroy Road, south of Myrtlebury Way and east of the Exeter-Exmouth Railway Line as a District Centre (see accompanying Site Location Plan at Annex 1).

The site benefits from planning permission (ref. 19/1461/OUT) for retail and related town centre uses. Neither of the two town centres to serve the Monkerton and Hill Barton Masterplan Area as identified in the Masterplan document have come forward, and the land is not available for those purposes. The site at issue is now the only opportunity to provide local shopping and related facilities for the new community (approximately 2,500 homes) as well as the substantial existing residential and business communities on the east side of Exeter for which there is currently no coherent provision through a town centre.

Allocation of the site for a town centre will therefore reflect the planning permission that has been granted and its intended purpose to deliver a sustainable community on the east side of Exeter.

Whilst the plan purports to have made provision for a small number of new centres, it does not justify the failure to do so for the existing and future communities on the east side of Exeter, and specifically why the subject site that already benefits from planning permission and is intended to serve the existing and future communities, has been omitted.

In the face of an existential threat to bricks and mortar retailing from on-line sales, a much smarter approach to the designation of centres is required if physical retailing is to be delivered and sustained through a policy framework that enables, rather than discourages, investment. There is inertia in the Council's approach to the town centre hierarchy in Exeter which has failed to respond to either current market circumstances or to the city's expansion, in particular the substantial growth of residential and business communities on the east side of Exeter.

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)

- Designation of the subject site identified on the accompanying site location plan (at Annex 1 as a district centre through inclusion in the list of District Centres at paragraph 8.14.
- Consequential amendments to the Policies Map.

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)

To assist the Inspector with his/her inquisitorial examination of the soundness of the Plan to ensure the delivery of sustainable development.

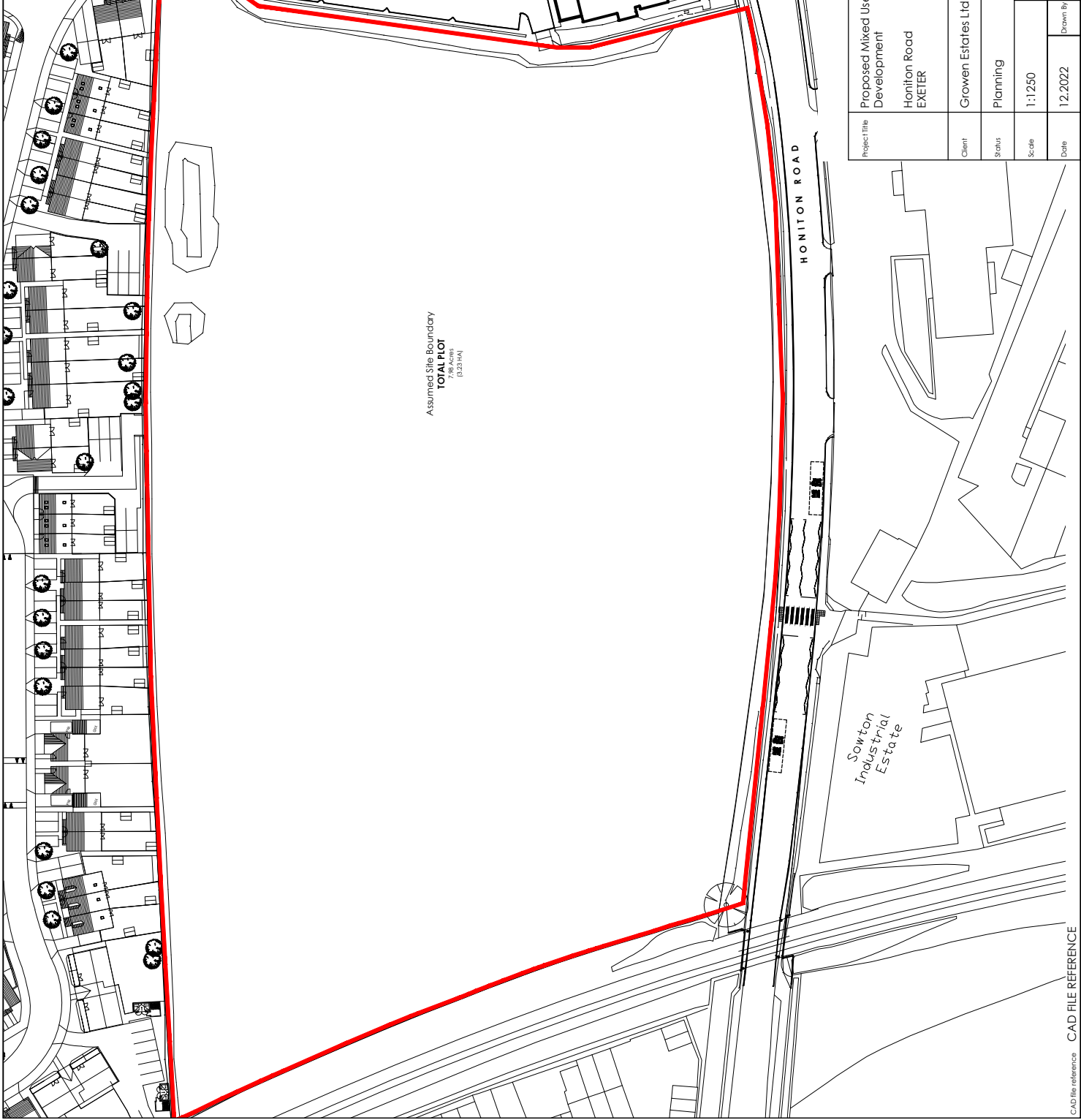
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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>



Annex 1

Land North of Honiton Road, Exeter Site Location Plan



Project Title	Proposed Mixed Use Development Honiton Road EXETER
Client	Growen Estates Ltd
Status	Planning
Scale	1:1250
Date	12.2022
Drawn By	

