

Exeter Plan

Hearing statement

Matter 8: Regeneration and Economic Development

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Exeter City Council
Civic Centre
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1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 8 which addresses regeneration and economic development.
- 1.2. The statement is divided into sections which cover each of the following issues:
 - Issue 1 – Regeneration opportunity areas – Policy H3
 - Issue 2 – Employment land – Policy EJ2
 - Issue 3 – Employment provision and local services – Policies EJ3 and EJ5
 - Issue 4 – Access to jobs and skills – Policy EJ4
 - Issue 5 – New transformational employment allocations – Policy EJ6

2. Issue 1: Regeneration Opportunity Areas – Policy H3

Q1. What are Regeneration Opportunity Areas and what is the justification for their inclusion in the Plan?

- 2.1. Regeneration opportunity areas are areas that are suitable for comprehensive regeneration that may occur anywhere within the urban boundary. Two examples are Marsh Barton and North Gate. Regeneration would be appropriate subject to proposals meeting a series of criteria including making more efficient use of land and enhancing the urban environment. Policy H3 aims to support decision-making when comprehensive proposals come forward.
- 2.2. The policy is consistent with national and corporate policy and strategy. At a national level, the potential for regeneration is consistent with the brownfield focus of paragraph 123 of the NPPF. More locally, regeneration is a policy manifestation of the City Council Liveable Exeter initiative which was established to ensure that housing needs could be met in Exeter's administrative area whilst also delivering major investment in the city, renewing infrastructure and improving lives and wellbeing (EVB-S-01a, page 3). In order to ensure development quality, the schedule of suggested modifications suggests modification SMM2 so that Policy S2: Liveable Exeter Principles would apply to comprehensive regeneration (CSD-03, page 3).
- 2.3. In order to demonstrate that there are opportunities for regeneration and to consider how such regeneration could come forward, further work has been carried out for an example regeneration area, part of Marsh Barton (EXM-02p). This study considers the constraints on site, but also the significant opportunities which could be realised if parts of Marsh Barton were subject to regeneration. Potential opportunities have also been identified at North Gate in the Views, heights and capacity study (EVB-HH-03: section 1.3, page 13) in the context of heritage assets and key views. In this particular case, City Council ownerships could be a catalyst for regeneration.
- 2.4. As a further tool for supporting the development of brownfield land, policy H3 provides criteria specifying what is required in taking forward regeneration in the urban area. This, alongside consistency with the brownfield focus of paragraph 123 of the NPPF, means that including the policy in the Exeter Plan is justified.

Q2. How do they differ from site allocations and what were the reasons for not allocating land in the same way as other sites in the Plan? How were the sites identified? Were alternatives considered and/or discounted?

- 2.5. Opportunities for regeneration may arise across the city within the urban boundary. Marsh Barton and North Gate are examples where such regeneration could take place; they are not allocations. As such, they are not identified as allocations in Policy H2: Housing allocations and windfalls, and are

not covered by strategic mixed-use brownfield site allocations policies as is the case with the strategic sites in the plan (SBAs1-5).

- 2.6. Importantly, the City Council has not included specific housing delivery at Marsh Barton and North Gate within the trajectory – a key difference when compared to an allocation.
- 2.7. The identification of Marsh Barton and North Gate as regeneration areas has its origins in the Liveable Exeter regeneration initiative which identified eight strategic areas for potential mixed use, comprehensive redevelopment (EVB-S-01a: page 10), including these two sites. All of these sites were considered as potential allocations in the Regulation 18 consultations for the Plan.
- 2.8. Marsh Barton and North Gate were included as draft allocations in the Regulation 18 Outline Draft plan (SUP-PRE-02a: page 23) and Regulation 18 Full Draft Plan (SUP-PRE-03a: page 31). In the case of Marsh Barton, the capacity reduced between the two consultations. As the plan progressed, it became clear that allocation was not appropriate for Marsh Barton and North Gate because of a lack of deliverability evidence. They were therefore removed from the plan.
- 2.9. The sites were assessed through the Housing and Economic Land Availability Assessment (EVB-H-0a: pages 65 and 185) and Sustainability Appraisal (SA) (EXM-02a: page 103). Alternative regeneration opportunity areas to Marsh Barton and North Gate were not assessed because the policy explicitly states that regeneration could take place across the city within the urban boundary.

Q3. How are the sites expected to come forward? How would a decision-maker be expected to react to a proposal for a smaller form of development, on individual sites within larger regeneration areas?

- 2.10. Regeneration Opportunity Areas could come forward anywhere within the urban boundary and they are not allocations. On this basis the City Council does not have specific expectations about when regeneration could come forward apart from when elements are allocated in their own right or already have permission. For example, within North Gate, the Mary Arches Street Car Park allocation (site reference 163) is currently subject to a planning application for co-living development and 7-11 North Street has residential permission.
- 2.11. There are opportunities for parts of North Gate to see regeneration during the plan period because large parcels are in Council ownership (e.g. Guildhall Shopping Centre). Opportunities within Marsh Barton would be likely to be reliant on private owners bringing forward land parcels. The Marsh Barton Regeneration Opportunity Area Report (EXM-02p: pages 16 and 18) provides examples of this type of development opportunity.
- 2.12. Proposals for individual sites within the regeneration opportunity areas would be permissible. A decision-maker would consider the merits of these types of proposal taking into account all relevant policies within the Exeter Plan; this is a reasonable approach given that comprehensive regeneration is not a

requirement within the regeneration opportunity areas or elsewhere within the urban boundary.

Q4. Would the development of the Regeneration Opportunity Areas result in the loss of employment land? If not, how would this be ensured? Is the policy effective in this regard?

- 2.13. The City Council is particularly mindful of the importance of employment to the city and wider functional economic area. On this basis, Policy H3(e) specifically requires comprehensive redevelopment proposals to ensure 'no loss of employment floorspace'. Although it is acknowledged that this criterion does not protect against the loss of employment land, it does specifically ensure the retention of existing levels of floorspace.
- 2.14. There is also a clear relationship between the regeneration areas and policy EJ2: Retention of employment land. Policy EJ2 ensures that employment land will not be lost to other types of development within the 'established employment areas'. The intention is that this would preclude comprehensive regeneration in these areas. To clarify this position, it may be appropriate to consider a modification to Policy H3.
- 2.15. Looking specifically at Marsh Barton and North Gate as examples of where regeneration could take place, there may be opportunities to potentially increase employment at these two sites. In Marsh Barton, employment land is used inefficiently and at North Gate there is limited existing employment space.
- 2.16. The policy is considered to be effective because it does not specifically require regeneration and if comprehensive proposals do come forward, they would need to ensure no loss of employment floorspace; the fundamental determinant of employment.

Q5. Is the strategic approach of focussing regeneration development on brownfield land justified? Has this approach been adequately tested to ensure it is viable and deliverable? What adequate reasonable alternatives have been considered?

- 2.17. In terms of an overarching strategic approach, the SA has been used to develop and assess the spatial strategy as it emerged. The initial assessment was of four strategic policy options (EXM-02a: paragraph 4.2, page 76) as follows:
- Option A: Focus most development on large, strategic brownfield sites.
 - Option B: Focus on developing greenfield sites.
 - Option C: Dispersal on smaller sites.
 - Option D: Focus on public transport hubs and routes within the city.
- 2.18. Option A provided the most positive effects and so was taken forward as the basis for the spatial strategy. On this basis, the strategic approach is justified and based on the consideration of reasonable alternatives.
- 2.19. In terms of considering alternatives to *brownfield* regeneration, focusing regeneration on brownfield development is implicit to the approach of

regeneration; the City Council position is that the development of greenfield sites is not considered to be regeneration. The NPPF (paragraph 124) specifically sets out that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements. The strategic approach of focusing regeneration on brownfield land is consistent with the NPPF in this regard.

- 2.20. The requirements of Policy H3 have not been specifically tested through the Exeter Plan Viability Assessment (EVB-IF-01a) because the policy does not require that regeneration comes forward; it supports regeneration subject to various criteria. However, the Viability Assessment does test a series of development typologies which reflect the variety of sites which are anticipated to come forward in Exeter (EVB-IF-01a, paragraph 5.3, page 40). This includes a variety of brownfield typologies at various scales and unit types (including houses, flats, PBSA, co-living and other specialist house types). The Viability Assessment Addendum (EVB-IF-01b) presents further site specific work for all of the strategic brownfield allocations as well as some sites within North Gate (EVB-IF-01b, chapter 3, page 14 onwards). These documents provide proportionate evidence with regard to the viability of regeneration.
- 2.21. The SA included one reasonable alternative approach for the policy as a whole (EXM-02a, page, 149) which was not to include a policy. This was not taken forward because it would not provide support for the regeneration of brownfield land that could deliver housing and support economic growth. Alternative regeneration opportunity areas to Marsh Barton and North Gate were not assessed because the policy explicitly states that regeneration could take place across the city within the urban boundary. Alternative approaches for regeneration, for example, on greenfield land, are not considered reasonable and so have not been tested.

Q6. Is Policy H3 intended to set out development requirements in the same way as site allocation policies?

- 2.22. To help determine when comprehensive redevelopment proposals may be appropriate, Policy H3 sets out a series of requirements. The policy supports decision-makers by clearly identifying criteria which would need to be met in considering proposals for comprehensive regeneration. It should be noted that the other policies in the plan would also apply. Policy H3 is not an allocation policy and would apply across the city within the urban boundary.

Q7. Will the policies in the Plan be effective in securing the regeneration of areas identified under Policy H3, or are they intended to guide proposals for redevelopment as and when they come forward?

- 2.23. Policy H3 provides high-level support for urban regeneration, guiding proposals for redevelopment as and when they may come forward across the city. The inclusion of the policy is to support more widespread brownfield development of a high quality in order to be proactive and to be consistent with the brownfield focus of paragraph 123 of the NPPF.
- 2.24. Proposals for regeneration will be considered in the context of policy H3 and the other policies in the plan. Taken together they will be effective in supporting high quality regeneration. In order to ensure development quality, the Schedule

of suggested modifications suggests modification SMM2 so that Policy S2: Liveable Exeter Principles applies to the regeneration areas and elsewhere where comprehensive regeneration takes place (CSD-03: page 3). This will provide further guidance on policy expectations.

Q8. Are the requirements set out in Policy H3 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 2.25. The policy principle of supporting brownfield regeneration is consistent with paragraphs 123 and 124 (d) of the NPPF.
- 2.26. Policy H3 is tested in the SA (EXM-02a, page 143), scoring well; the assessment scored it positively against 6 of the 14 objectives and did not score it negatively against any. The policy provisions scored more positively than the reasonable alternative of omitting an equivalent policy.
- 2.27. The Local Plan Viability Assessment specifically tests a series of development typologies which reflect the variety of sites which could come forward in Exeter (EVB-IF-01a, paragraph 5.3, page 40). This includes a variety of brownfield typologies at various scales and unit types (including houses, flats, PBSA, co-living and other specialist house types) which would represent the type of development which could come forward as comprehensive regeneration.
- 2.28. The Local Plan Viability Assessment Addendum also presents further site specific work for all of the strategic brownfield allocations as well as some sites within the North Gate regeneration opportunity area (EVB-IF-01b: chapter 3, page 14 onwards), both of which reflect the types of development that would be viable and deliverable in the regeneration opportunity areas. This provides proportionate evidence of the viability and deliverability of regeneration.

Q9. What is the justification for the suggested modification to Policy H3? Why is it necessary for soundness?

- 2.29. The Schedule of suggested modifications includes modification SMM28 (CSD-03: page 12). This suggests additional text to clarify that the criteria in policy H3 apply specifically to 'comprehensive regeneration'. The modification then includes additional text to state that other policies in the plan will apply and also stipulates the critical consideration of heritage and flood risk for North Gate and Marsh Barton respectively.
- 2.30. These suggested modifications are necessary for soundness; the clarification regarding the policy only applying to proposals for comprehensive regeneration will ensure that the policy is effective in terms of not imposing overly onerous restrictions on all development which could preclude small scale proposals.
- 2.31. The modification which emphasises the critical consideration of flood risk at Marsh Barton and heritage at North Gate is necessary for the policy to be justified.
- 2.32. In terms of Marsh Barton, the Strategic Flood Risk Assessment level 1 (EVB-CC-13a: paragraph 3.1, page 4) explains that the River Exe has a natural

floodplain which extends into Marsh Barton, while the Strategic Flood Risk Assessment level 2 (EVB-CC-13b: Table 6-5, page 30) states that 97% of Marsh Barton is in flood zone 3a. The suggested modification to refer to flood risk is therefore justified and necessary for soundness.

- 2.33. In terms of North Gate, the Heritage Impact Assessment (EVB-HH-01: page 108-109) states the various heritage and archaeological assets which will be critical considerations for development in the area. This is taken further in terms of key views in the Exeter Plan Strategic Allocations: Views, Heights and Capacity – Applied Methodology (EVB-HH-03: 1.3, pages 12-17). The suggested modification to heritage is therefore justified and necessary for soundness.
- 2.34. An additional modification may also make the policy clearer and more effective with regard to its relationship with the established employment areas set out in EJ2: Retention of employment, areas in which comprehensive regeneration is not considered appropriate.
- 2.35. Various other changes are suggested to the supporting text; whilst it is not considered that these changes are required for soundness, they do address concerns made by other parties and make the Exeter Plan more effective.

3. Issue 2: Employment land – Policy EJ2

Q1. How would Policy EJ2 ensure that employment land would not be lost as a result of other types of development within the identified Regeneration Opportunity Areas? Is the policy effective in this regard?

- 3.1. Policy EJ2 ensures that employment land will not be lost to other types of development within the 'established employment areas' (as the first paragraph of policy EJ2 states these areas will be retained in employment use).
- 3.2. Elsewhere within the urban boundary where land comes forward for comprehensive regeneration, some loss of employment *land* to other types of development may occur, but there would be no loss of employment *floorspace* (criteria (e) of policy H3 ensures this). Through schemes that make more efficient use of land, development can retain or increase employment floorspace whilst also introducing other uses including housing.
- 3.3. Whilst it is considered that the policy is effective in this regard, a main modification is suggested (CSD-03 SMM53) to amend the policy layout to ensure the policy is effective (discussed in response to Question 3 below).
- 3.4. It may also be appropriate to consider a slight modification to the supporting text for Policy EJ2 to clarify that employment land *outside the established employment areas* can also provide new opportunities for comprehensive regeneration, combining housing and employment in ways that make more efficient use of land. Such proposals would need to comply with all the criteria in Policy H3: Regeneration opportunity areas.
- 3.5. Note: This would need to be consistent with the approach taken with regard to policy H3 (see response to Issue 1, Question 9).

Q2. Is Policy EJ2 positively prepared, justified, effective and consistent with national planning policy?

- 3.6. Yes, policy EJ2 seeks to meet the identified needs for employment land and is therefore positively prepared. It is justified by the evidence base (EVB-EJ-04: Exeter Employment Study and EVB-EJ-03a: Economic Development Needs Assessment (EDNA) Final Report and EVB-EJ-06: Employment supply in Greater Exeter), effective in protecting employment land and consistent with national planning policy which states planning policies should 'set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period' (NPPF, paragraph 86) and 'should promote an effective use of land' (NPPF, paragraph 123).

**Q3. What is the justification for the suggested modification to Policy EJ2?
Why is it necessary for soundness?**

- 3.7 The suggested amendment to the layout of Policy EJ2 (SMM53) is to ensure the policy is effective and deliverable over the plan period, by avoiding any chance of misinterpretation, in accordance with the tests of soundness.
- 3.8 The suggested additions to the supporting text (SMM56) are intended to aid interpretation of the policy requirements and to clarify how the policy will be applied, but are not required for soundness.

4. Issue 3: Employment Provision and Local Services – Policies EJ3 and EJ5

Q1. Is Policy EJ3 consistent with paragraph 88 of the Framework, which requires planning policies to enable the sustainable growth and expansion of all types of business in the rural areas, both through conversion of existing buildings also well-designed new buildings?

- 4.1. Policy EJ3 relates to the urban area and specifically to encouraging new and flexible working practices within the strategic mixed use allocations. The policy is positively prepared and written to encourage new forms of employment provision and is therefore both reasonable in itself and not inconsistent with paragraph 88 of the Framework.
- 4.2. As Exeter is an urban authority, rural business growth and expansion is not a key issue and therefore there is not considered to be any need for a specific policy relating to this; nevertheless, proposals for such development within the rural area surrounding Exeter would be positively received in accordance with the NPPF and other policies within the Exeter Plan.

Q2. Is Policy EJ3 positively prepared, justified, effective and consistent with national planning policy?

- 4.3. Yes, policy EJ3 seeks to meet anticipated needs over the plan period and is therefore positively prepared. It is justified by the evidence base Devon Work Hubs and Coworking Spaces (EVB-EJ-02: Executive Summary, pages 4-5), Exeter Employment Study (EVB-EJ-04: Section 8.4, page 55) and Economic Development Needs Assessment (EDNA) Final Report (EVB-EJ-03a: page 23, 3.4.11), effective in delivering new forms of employment provision and consistent with national planning policy which states that planning policies should help 'create the conditions in which businesses can invest expand and adapt' (paragraph 85, NPPF) and 'allow for new and flexible working practices' (paragraph 86, NPPF).

Q3. What is the justification for the suggested modification to Policy EJ3? Why is it necessary for soundness?

- 4.4. The suggested amendments to the wording and requirements of Policy EJ3 (SMM54) are intended to avoid the requirements being unduly prescriptive and to allow for the delivery of other new forms of employment provision (not specifically listed in the policy), to ensure the policy is effective in delivering over the plan period and consistent with national policy that requires policies to 'be flexible enough to accommodate needs not anticipated in the plan' (paragraph 86, NPPF) in accordance with the tests of soundness.

Q4. Is Policy EJ5 positively prepared, justified, effective and consistent with national planning policy?

- 4.5. Yes, policy EJ5 seeks to meet anticipated needs over the plan period and is therefore positively prepared. It is justified by the evidence base Exeter Employment Study (EVB-EJ-04: Assessment Criteria Employment Land Review, page 125) and Economic Development Needs Assessment (EDNA)

Market Assessment (EVB-EJ-03b: Methodology, page 5), effective in delivering viable and sustainable established employment areas and consistent with national planning policy which states planning policies should 'seek to address potential barriers to investment, such as inadequate infrastructure, services' (NPPF, paragraph 81), help 'create the conditions in which businesses can invest expand and adapt' (NPPF, paragraph 85) and 'be flexible enough to accommodate needs not anticipated in the plan' (NPPF, paragraph 86).

Q5 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 4.6 No modifications are suggested to policy EJ5. Regarding EJ3, see the Council's response to Question 3 above.

5. Issue 4: Access to jobs and skills – Policies EJ4

Q1. Policy EJ4 requires all major development proposals to submit, and deliver the provisions in, an Employment and Skills Plan to demonstrate that the policy's objectives have been met? What is the justification for this approach?

- 5.1 The requirements of Policy EJ4 will help to build skills and improve pathways to work for young people and disadvantaged groups. This is entirely in accordance with 'The UK's Modern Industrial Strategy' which seeks to 'create an independent, high skilled, dynamic, and economically prosperous country, where opportunity, skills, and wealth abound and are spread fairly; where jobs are high-quality, accessible, and secure; and where every person and every business have the chance to flourish' (The UK Modern Industrial Strategy, Introduction, page 22 - The UK's Modern Industrial Strategy).
- 5.2 The requirements of Policy EJ4 are also helpful in delivering the objective of Skills England¹ to get more people into skilled jobs, enabling growth and opportunity.
- 5.3 The Building Greater Exeter (BGE)² initiative showcases the impact the built environment can bring to the local economy through jobs and training and provides support to deliver Employment and Skills Plans. Various other councils support employment and skills plans, including Hampshire and Plymouth. Building Plymouth is the equivalent of BGE and also provides support for employment and skills plans.
- 5.4 Since 2019, the City Council has encouraged developers to submit an Employment and Skills Plan with schemes for major development. Policy EJ4 would formalise this process and make it a requirement for major development proposals to submit an Employment and Skills Plan. This is entirely in accordance with the latest BGE support presented on the BGE website: [Building Greater Exeter – Build Your Future](#)

Q2. Is Policy EJ4 positively prepared, justified in all other respects, effective and consistent with national planning policy?

- 5.5 Yes, policy EJ4 is positively prepared as it seeks to meet skills and training needs working in partnership with neighbouring authorities including East Devon District Council and Teignbridge District Council; the policy is justified by BGE which provides support for this initiative, effective in delivering the last part of Policy EJ1 which refers to improving education and training, and consistent with national planning policy in that it 'supports economic growth and productivity' in accordance with paragraph 85 of the NPPF by producing employment and skills plans (which will help to overcome the issue of a local skills gap and enable development delivery, including housing, to continue).

¹ <https://www.gov.uk/government/organisations/skills-england/about>

² BGE was hosted by ECC until 2024 and ECC is a partner organisation and has provided Shared Prosperity Fund funding towards it.

**Q3 In terms of this issue, are any of the suggested modifications in the
Schedule of Suggested Modifications necessary for soundness?**

5.6 No modifications are suggested to policy EJ4.

6. Issue 5: New transformational employment allocations – Policies EJ6

Q1 What are Transformational Employment Sites and what is the justification for their inclusion in the Plan?

- 6.1 Transformational employment sites are employment allocations specifically intended for businesses in the transformational sectors to develop and grow. The transformational sectors are those with the potential to transform the local economy including data analytics, environmental futures, smart transport, health innovation and other digital futures as set out in the Exeter Plan (CSD-02: Exeter Plan: Publications Plan, page 57-58, paragraph 7.8). They are consistent with the eight key high-growth sectors (the 'IS-8') backed by The UK's Modern Industrial Strategy³ as 'the ones that have a transformative role to play in the clean energy transition, the tech revolution, the fundamental impact of AI on every sector and the new geopolitics' ('Executive Summary, page 11).
- 6.2 However, it should be noted that in the Exeter Plan Schedule of Suggested Modifications the Council suggests a main modification to EJ6 to remove the restriction that these sites should only be occupied by the transformational sectors (CSD-03: SMM55). This change is suggested in response to various representations which suggested the term 'transformational' was not readily understood and that a more flexible approach to allocation would best meet employment needs. Furthermore, a review of the supporting evidence suggests that at least one of the allocation sites, 'Land adjacent to Ikea, Newcourt', may be more suited to traditional forms of employment, i.e. B8: Storage and distribution (EVB-EJ-04: Exeter Employment Study, Ref No.24 Newcourt A, page 151).
- 6.3 This proposed modification is not intended to in any way suggest that the transformational sectors are less important to Exeter's future growth; indeed, policy EJ1 continues to stress the support that will be given to the transformational sectors and the eight key high-growth sectors (the 'IS-8' sectors).

Q2 How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

- 6.4 The Council has taken a positive and proactive approach to identifying and considering sites for inclusion as employment allocations in the Exeter Plan. Sites were identified for assessment via three calls for sites undertaken throughout plan preparation^[1]; by writing to the landowners of sites within the Liveable Exeter Prospectus (EVB-S-01a); by writing to the landowners of all undeveloped employment allocations in the current development plan; and by contacting and working with some landowners proactively due to officer knowledge of undeveloped land in the city (St Lukes Campus, Middlemoor Police Headquarters and Toby Carvery).

³ [The UK's Modern Industrial Strategy](#)

^[1] November 2020 to January 2021; at Regulation 18 stage in 2022; and at Regulation 18 stage in late 2023/early 2024.

- 6.5 The HELAA assessed sites for employment development that:
- Met the site size thresholds for assessment set out in paragraph 009 of the HELAA PPG; and
 - Were submitted for employment assessment by the landowner, or were already allocated for employment in the development plan, or already had planning permission for employment use, or were already entirely or partly in employment use.
- 6.6 Based on the HELAA assessment, each site was given a Green, Yellow, Amber or Red rating for potential employment development.
- All sites RAG rated green for employment are allocated for employment (either as a standalone allocation or as part of a mixed use strategic allocation), unless they are already in employment use, or already have planning permission (meaning allocation is not necessary).
 - All sites RAG rated amber for employment are allocated for employment (either as a standalone allocation or as part of a mixed use strategic allocation) unless the site is a community facility and there is no clear potential for provision of a replacement facility
- 6.7 The SA concludes that no HELAA sites stand out as being overwhelmingly more or less sustainable for housing or employment development than other options.
- 6.8 Sites were allocated for employment if suitable (i.e. RAG rated green) even if also suitable for housing.
- Q3 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were potential impacts on heritage assets considered as part of this process?**
- 6.9 The site selection process was robust: as explained above, it was based on the HELAA and consideration in the SA. The process also considered viability and deliverability and was informed by input from an extensive range of stakeholders.
- 6.10 The Council sought to maximise the number of sites assessed in the HELAA, and thereby the SA, as set out in paragraph 6.4 above. Therefore, an appropriate selection of potential sites was assessed.
- 6.11 The HELAA and SA considered an appropriate range of criteria: constraints relating to nature, landscape, flood risk and drainage, heritage conservation, open space and recreation, minerals and waste, employment and housing land supply, access and movement, health and safety, infrastructure capacity, retail and community facilities were assessed.
- 6.12 Specifically in relation to heritage conservation, all submitted HELAA sites were subject to an initial desk-based assessment, supplemented by site visits where necessary, to identify any historic assets within or adjacent to the site. Specialist advice was also sought from Historic England and the City Council's heritage officer for all sites. The advice provided is presented in the HELAA.

- 6.13 Allocations were also informed by the Heritage Impact Assessment of potential development sites (EVB-HH-01). This considered the development sites in the context of a range of heritage considerations including listed buildings, conservation areas, locally listed buildings, the historic landscape and archaeology.
- 6.14 Finally, given its urban location and partial inclusion in the St Leonard's Conservation Area, the St Luke's Campus allocation was considered through the consideration of key views as identified in the Exeter Skyline Study EVB-HH-02.

Q4 What effect will the allocation have on the character of the area, having particular regard to heritage assets?

- 6.15. Two of the proposed allocations in policy EJ6, Land adjacent to Sandy Park and Land adjacent to Ikea (both within the Newcourt area), are on greenfield sites with no particular constraints and no heritage assets within or adjacent to the sites. Furthermore, whilst the form and siting of the development isn't known at present, designing the development to respect and protect the character of the area does not present particular challenges. It is therefore considered that the development of these sites will preserve the character of the area.
- 6.16. The allocation at St Luke's relates to a brownfield site within the built-up area. Furthermore, there are important heritage assets both within the site and in the surrounding area. Whilst the supporting text refers to these heritage assets (paragraph 7.31) it is suggested that a modification is needed to the text to ensure it is clear that proposals for demolition and rebuild will focus on the east of the site (protecting the heritage of the site and surroundings) and to provide more guidance on the form the development needs to take. Amended text to reference heritage assets, the conservation area and adjoining listed buildings is suggested (CSD: 03, SAMM60). Historic England and the University of Exeter are supportive of this amended text (in the case of Historic England this is set out in the statement of common ground: DTC-03h. page 28).
- 6.17. A masterplan is currently in production by the University working jointly with the City Council⁴. It's vision is to 'to greatly improve the look of the site by creating a modern and biodiverse landscape, whilst opening up the area with welcoming, publicly accessible spaces that are beneficial to the health of those that work, study and visit the campus' and a key objective is to 'Establish design parameters, including quantum of floor area, scale, height and distribution of open space, to ensure the final proposals appropriately address the sites context.'
- 6.18. With the ongoing work on the masterplan and the suggested modification to the supporting text, it is considered that St Lukes will be developed in a way that ensures the appearance of the site is enhanced and the special architectural and historic character of the area is preserved.
- 6.19. Proposed development on all three sites will also be assessed with regard to all other relevant policies in the Plan: in particular policy D1: Desing principles will

⁴ Available at: [St. Luke's redevelopment | Capital Strategy | University of Exeter](#)

ensure that that development is of a high quality and policy HH1: Conserving and enhancing heritage assets will ensure heritage assets are protected.

Q5 Paragraph 7.32 states that a masterplan/Supplementary Planning Document (SPD) will be prepared by the City Council and the University to guide the proposals for the St Luke's Campus site which will sit alongside the 2010 University of Exeter Streatham Campus Masterplan Framework SPD. Is it appropriate to defer decisions over the use and scale of future development to a masterplan/SPD, which would not be subject to examination in the same way as a development plan document?

- 6.20. Policy EJ6 sets out that the site is to be used for employment purposes, and the supporting text (CSD-02, paragraph 7.30) indicates the scale of development in terms of floorspace, so decisions regarding use and scale will not be deferred to the masterplan.
- 6.21. It is considered that that the right level of detail is included within the policy and that the St Lukes Campus masterplan (which is being prepared in partnership with the City Council) will be helpful in ensuring development comes forward in an appropriate and comprehensive manner.
- 6.22. Proposed development will also be assessed under all other relevant policies of the Exeter Plan; in particular policies H16: Residential Amenity and Healthy Homes, D1: Design Principles and HH1: Conserving and Enhancing Heritage Assets.
- 6.23. The masterplan is currently in production by the University alongside the City Council⁵ and development proposals have already been the subject of consultation⁶.
- 6.24. Paragraphs 7.32 and 7.33 of the Plan (paragraph numbers amended by suggested modification SAMM60, page 77 of CSD-03) currently refer to the potential for a Supplementary Planning Document (SPD) to be produced. It may be considered appropriate to remove these references on the grounds that new SPDs will not be able to be adopted after June 2026 as clarified by Government Guidance in November 2025⁷. The jointly prepared masterplan is still required. This approach has been discussed with the University.

Q6 Is it clear to decision-makers, developers and local communities what will be provided and where across each of the sites identified by Policy EJ6?

- 6.25. These are employment allocations and therefore it is clear that these sites will be developed for employment purposes. However, for the two Newcourt sites it is not yet clear what floorspace will be delivered (this would be dependent upon use class and associated development density), nor the exact details of development form and siting (again this would be dependent upon the use

⁵ Available at: [St. Luke's redevelopment | Capital Strategy | University of Exeter](#)

⁶ Available at: [St Luke's engagement display materials April 2024.pdf](#)

⁷ Available at: [Plan-making regulations explainer - GOV.UK](#)

class proposed). However, the two Newcourt sites are both greenfield sites, with relatively few constraints.

- 6.26. Policies in the Exeter Plan will ensure that amenity is protected (policy H16: Residential Amenity and Healthy Homes) and that development is of a high quality (policy D1: Design Principles). Other considerations are likely to relate to policies within the Climate Change, Sustainable transport and Communications, Natural Environment, Health and Wellbeing and Infrastructure and Facilities chapters of the Exeter Plan.
- 6.27. For the St Lukes site, there is more detail emerging about the form that development could take through the masterplan work being undertaken in partnership with the university.

**Q7 What is the justification for the suggested modification to Policy EJ6?
Why is it necessary for soundness?**

- 6.28. In the Exeter Plan Schedule of suggested modifications, the Council suggests a main modification to policy EJ6 to delete 'transformational' and hence remove the restriction that these sites should only be occupied by the transformational sectors (CSD-03: SMM55).
- 6.29. This suggested change has been made to ensure the policy is positively prepared, taking account of various representations which suggest the term 'transformational' is not readily understood and that a more flexible approach to allocation would best deliver growth and meet employment needs; justified by the evidence, that indicates that one of the sites, 'Land adjacent to Ikea, Newcourt', may be more suited to traditional forms of employment, i.e. B8: Storage and distribution (EVB-EJ-04: Exeter Employment Study, Ref No.24 Newcourt A, page 151); and effective in delivering economic growth in a flexible manner, in accordance with national policy which requires planning policies to be flexible (NPPF, paragraph 86).

7. Summary

- 7.1. This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 8 of the Exeter Plan Examination.
- 7.2. All questions associated with all issues for Matter 8 have been answered.