

Exeter Plan

Statement of Common Ground

Exeter City Council and East Devon District Council

September 2025

Exeter City Council

Civic Centre
Paris Street
Exeter
EX1 1JN



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1.0 Introduction

- 1.1. Exeter City Council (the City Council) have been preparing the Exeter Plan since late 2020. The plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 1.2. Following the end of the publication process in February 2025 representations have been compiled and attention has turned to addressing the issues raised in the representations.
- 1.3. East Devon District Council provided a series of representations or comments to the Regulation 19 Plan. These are considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and East Devon District Council have cooperated on strategic matters and that the plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph of the National Planning Policy Framework¹. The document assists in presenting evidence that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It is also part of the evidence required to demonstrate compliance with the Duty to Cooperate.
- 1.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance² and meets the requirements of the Planning and Compulsory Purchase Act 2004³ and the Localism Act 2011⁴.
- 1.6. Collaboration on evidence and meetings to discuss cross-boundary strategic issues have taken place with the East Devon District Council since before the first 'Issues Consultation' in 2021. In 2024 a joint duty to cooperate meeting was held with all partners within the Functional Economic Market Area and significant changes were made to the Exeter Plan to address concerns raised at Regulation 18 stage. A further meeting was held with East Devon on 18 March 2025 to discuss representations made at Regulations 19 stage and further proposed changes are suggested in this document. This demonstrates that there has been joint working between Exeter City Council and East Devon District Council since the outset of plan-making.

¹ The Exeter Plan is being prepared under the December 2023 version of the NPPF. Available here:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Available at: <https://www.gov.uk/guidance/plan-making>

³ Available at: <https://www.legislation.gov.uk/ukpga/2004/5/section/13>

⁴ Available at: <https://www.legislation.gov.uk/ukpga/2011/20/section/110>

2.0 Joint Strategy: Our shared coordinates

- 2.1. A Joint Strategy called Our Shared Coordinates⁵ has been prepared for the area covered by Exeter, East Devon, Mid Devon and Teignbridge Councils. This follows decisions taken by each of the four Councils in 2021. The document has been prepared in partnership with Devon County Council.
- 2.2. The Joint Strategy is a non-statutory document that reflects the ambitions and proposals of existing and emerging Local Plans across the area. It sets out shared ambitions, linkages and priorities across a range of strategic planning matters and identifies a high level list of infrastructure matters that have cross-boundary significance for supporting the delivery of planned new homes, jobs, services, transport and other development.
- 2.3. Specifically, regarding jobs and prosperity the Joint Strategy states “There is a significant opportunity to ensure that the benefits of growth in and around Exeter are shared across our whole area’.
- 2.4. The Joint Strategy demonstrates the commitment to ongoing joint working across the area on strategic matters. It was approved by the City Council’s Executive in November 2023. It has also been approved by East Devon, Mid Devon and Teignbridge District Councils.

⁵ Available at: https://exeter.gov.uk/media/vvlfxnjd/joint_strategy_final_accessible.pdf

3.0 Strategic matters: Spatial strategy

Broad summary of chapter content

- 3.1 The spatial chapter of the plan sets the tone for the plan as a whole and in doing so sets out the main principles for guiding the pattern and form of development in the city.
- 3.2 The spatial strategy chapter includes two policies:
- S1: Spatial strategy; and
 - S2: Liveable Exeter Principles.
- 3.3 Policy S1 includes the new spatial strategy for Exeter. The spatial strategy guides the pattern and characteristics of development in the city and the proposed development sites included in the Exeter Plan. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape and retain Exeter's environmental and heritage quality.
- 3.4 Policy S2 includes the Liveable Exeter principles. These set out the requirements for the standard of development that the City Council will expect for all large-scale brownfield developments. Liveable Exeter is a growth and place-making initiative governed by seven principles which have been drawn from Exeter's Vision 2040. In adopting the Liveable Exeter principles, we aim to strengthen and reinvigorate existing communities and repurpose and transform other parts of the city through high quality development.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 3.5 No representations were raised regarding the spatial strategy chapter at Regulation 19 Publication stage.

4.0 Strategic matters: Climate change

Broad summary of chapter content

- 4.1 We are facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. In recognition of this, the City Council has declared a climate emergency and pledged to work towards creating a net zero carbon city by 2030. The Exeter Plan includes policies and proposals that contribute to meeting this challenging ambition and to making the most of the opportunities of a net zero carbon city, whilst adapting to the unavoidable impacts of climate change.
- 4.2 The climate change chapter includes nine policies which will support the move to a net zero city:
- CC1: Net zero Exeter;
 - CC2: Renewable and low carbon energy;
 - CC3: Local energy networks;
 - CC4: Ground-mounted photovoltaic arrays;
 - CC5: Future development standards;
 - CC6: Embodied carbon;
 - CC7: Development that is adaptive and resilient to climate change;
 - CC8: Flood risk; and
 - CC9: Water quantity and quality.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 4.3 No representations were raised regarding the climate change chapter at Regulation 19 Publication stage.

5.0 Strategic matters: Homes

Broad summary of chapter content

- 5.1 Housing is a significant issue nationally and for Exeter. The Exeter Plan will meet the city's housing requirement within the administrative boundary of Exeter City. It will also help to address the housing needs of those who require affordable housing, families with children, older people, students, people with disabilities, Gypsies and Travellers, people who rent their homes and people wishing to commission or build their own homes.
- 5.2 The homes chapter includes sixteen policies which will help to address housing needs in the city:
- H1: Housing requirement;
 - H2: Housing allocations and windfalls;
 - H3: Regeneration opportunity areas;
 - H4: Affordable housing;
 - H5: Build to rent;
 - H6: Co-living housing;
 - H7: Custom and self-build housing;
 - H8: Homes for older people;
 - H9: Supported housing;
 - H10: Purpose built student accommodation;
 - H11: Gypsy and traveller accommodation;
 - H12: Residential conversions and houses in multiple occupation;
 - H13: Loss of residential accommodation;
 - H14: Accessible homes;
 - H15: Housing density and size mix; and
 - H16: Residential amenity and healthy homes.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 5.3 No representations were raised regarding the homes chapter at Regulation 19 Publication stage.

6. Strategic matters: Economy and jobs

Broad summary of chapter content

- 6.1 Exeter is at the heart of a large functional economic market area which reflects a significant travel to work area. The Exeter Plan needs to support the economy and green growth by identifying the employment space and infrastructure we need. This will help to increase prosperity and wellbeing.
- 6.2 The economy and jobs chapter includes six policies which will help to address the economic and employment needs of the city:
- EJ1: Economic growth;
 - EJ2: Retention of employment land;
 - EJ3: New forms of employment provision;
 - EJ4: Access to jobs and skills;
 - EJ5: Provision of local services in employment areas; and
 - EJ6: New transformational employment allocations.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 6.3 ECC has been working closely with East Devon District Council throughout the plan-making process as set out in paragraph 1.6
- 6.4 At Regulation 19 stage a representation was received from East Devon District Council objecting to the economy and jobs chapter of the Exeter Plan on the grounds that it fails to allocate or otherwise make sufficient land available to accommodate future employment needs of the city, undermining the economic growth potential of the city and the stimulus it provides for the wider area and leading to pressure to accommodate growth outside the city boundary.
- 6.5 A duty to cooperate meeting was held on 18 March 2025 to discuss possible modifications to address the concerns outlined above. Whilst no modifications were agreed at this meeting it was agreed that ECC would revisit its approach, and discussions would continue in due course. Further to this meeting ECC commissioned support from Hardisty Jones Associates (who undertook the EDNA work) to identify possible matters to address in the Publication Draft Exeter Plan and to consider what would be an appropriate jobs growth target for Exeter. As a result of this additional work, ECC set out various possible modifications to the plan (see below).

6.6 The detail of the Regulation 19 representation and following discussions are presented in the table below.

Issue	Element of the plan (policy or paragraph)	Organisation's representation	ECC comment	Organisation's comment	Final position and suggested plan modification
Economy and jobs chapter	Economy and jobs chapter	East Devon District Council object to chapter 7, Economy and Jobs, of the Exeter local plan as it fails to allocate or otherwise make sufficient land available to accommodate future employment needs of the city. The City Council should respond to the evidence set out in the Greater Exeter Economic Development Needs Assessment - Microsoft Word - Greater Exeter EDNA HJA Final Report v2.1.docx (on the City Council website) and plan to meet quantified	The City of Exeter generates significant growth potential for the sub-region but has limited land within its administrative boundary to accommodate this. The growth of the City's economy can take place outside its boundary and the EDNA is clear on this issue. The Publication Draft Local Plan acknowledges the City's shortage of employment land, and refers to the city's role within a FEMA, stating that need and supply should be matched across Greater Exeter. The principle of matching requirement and supply across the FEMA is well established and is reflected in the commissioning and use of the Greater Exeter EDNA in the preparation of the Draft Local Plans in the area.	We appreciate the challenges of accommodating growth within the city boundaries but are not aware of any evidence that proves that the city cannot accommodate all of its growth. Clearly there are sensitivities and constraints with many sites but this is also the case with sites outside of the city. Our expectation is that the city meets its own needs in terms of employment land. It is acknowledged that employment land need and supply need to be considered across the FEMA but there has been no indication of how much employment land need Exeter CC expect to be met outside the	Detailed discussions have not resolved this issue and further consideration will be needed on this matter including through the Exeter Plan examination.

		employment land needs, in the city, as set out in Appendix 2 of this report - a mid-point on the Clean Growth need scenario being an appropriate level to plan for. From assessment of available data, noting full quantified data on all sources of supply is not specifically summarised, the Exeter Plan falls (appears to fall) a significant way short of meeting city needs. The proposed regeneration opportunity area also has significant potential to lead to a net loss of employment spaces in this part of the city. Whilst noting that the plan does reference a collective across local authority balance (in the Exeter Functional Economic Market Area) between employment land need and supply it	The current employment land need and supply position across the FEMA indicates that supply significantly exceeds demand and therefore economic growth potential will not be constrained. However, it is acknowledged that the Publication Draft Exeter Plan isn't sufficiently clear, or up to date, in regard to demonstrating how economic need can be met. Therefore, a modification to the Exeter Plan is to be suggested to set out the potential for economic growth generated by the FEMA over the plan period and to show how this is met by the constituent authorities. A further modification to Policy EJ1 of the Exeter Plan is to be suggested to insert an evidenced jobs growth target for Exeter.	city or any discussion about the division of this between the neighbouring authorities. The East Devon Local Plan 2020 – 2042 seeks to meet the needs of East Devon in terms of employment land and does not expressly seek to meet needs identified in the EDNA as arising within the city boundaries. It would not therefore be appropriate to modify the Exeter Plan to show how the need is met across the FEMA without agreement first being reached between the constituent authorities about how the needs identified in the EDNA as arising from the city are to be met. Unfortunately, this has not happened to date. More meaningful cross boundary working on this issue is needed. The 14,900 jobs stated in this modification derives from the clean growth scenario in the EDNA but this relies on a delivery of employment land far in excess of what is proposed in the Exeter Plan and thus is not	
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		is not considered that such an approach to need/provision is an appropriate means to plan for defined city generated needs. The approach adopted by the City Council, in not planning to meet city needs, generates the following failings: a) The plan will not be meeting the needs of the city. b) Lack of provision will undermine the economic growth potential of the city and the stimulus it provides for the wider area. Failure to provide undermines future economic success. c) Failure to make sufficient provision will lead to pressure to accommodate city generated growth to locations outside of the city boundary. Amongst other matters this will lead to greater outward	A modification will also be suggested to insert reference to the clean growth scenario and to state clearly that we are committed to strive to meet this higher growth potential. The Publication Draft Exeter Plan already indicates that development proposals will be supported where they meet the economic needs of the city as identified in the EDNA (see policy EJ1). However, a modification will be suggested to ensure a more balanced and flexible approach to economic growth, that refers to the priority sectors identified in the UK's Modern Industrial Strategy (as well as the transformational sectors). Furthermore, the new site allocations (see policy EJ6), which were identified specifically for transformational uses, will, through a suggested modification, be opened up to all traditional classes of economic development that meet the economic needs of the city and the	achievable. We are unable to understand how the clean growth scenario can be achieved within the city based on the land allocations made in the Exeter Plan as proposed. There is no objection to this modification, but as with the other modifications suggested, it does not address the concerns raised by EDDC. The issue is not the sectors being addressed but the quantum of employment land being provided to accommodate them. While these sites being open to all uses gives scope for them to accommodate those uses displaced by proposed redevelopments of brownfield sites such as at Water Lane, the reality is that they are unlikely to be able to afford to relocate to	
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		commuting and pressure on transport infrastructure. The City Council's approach appears to rely on employment land provision outside of the city boundary but within the wider Functional Economic Market Area in order to meet the economic needs of the area. However, no request has been made under the duty to co-operate for East Devon District Council to assist in meeting the employment land needs identified by the EDNA. The land identified in the emerging East Devon Local Plan 2020 – 2042 is considered to be necessary to meet the needs of East Devon and does not seek to address wider needs	wider area as identified in the EDNA. Whilst the transformational sectors will undoubtedly be important to the future of the City's economy, taking a less prescriptive approach to the nature of occupiers will ensure flexibility in meeting the employment needs of the city. Exeter has responded to previous concerns regarding brownfield sites (at Regulation 18 stage) by removing Marsh Barton and North Gate from the list of allocations. The regeneration opportunity areas are not allocations but are a proactive attempt to ensure efficient use of brownfield land in accordance with the approach advocated by national policy (this approach was actually suggested by MDDC at a duty to cooperate meeting on 16 April 2024 at which EDDC were present). Furthermore, the policy criteria for any proposed regeneration requires that development proposals 'Ensure no loss of employment floorspace'.	new premises on these sites. We previously developed briefs for a collaborative piece of work across the FEMA to among other things understand the likely impacts of the Exeter Plan on displaced employment uses, however the city council was unwilling to commit to this proposed commission. It is noted that the Marsh Barton and North Gate sites are now regeneration opportunity areas rather than allocations, however it is difficult to see how their redevelopment can be achieved in a way that ensures no loss of employment floorspace. The mix of uses particularly at Marsh Barton is limiting in terms of residential uses sitting alongside B2 uses and will lead to the displacement of traditional employment uses with no strategy for their accommodation elsewhere. These regeneration areas need a holistic masterplan approach and public sector intervention to achieve the intended outcomes.	
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			And finally, whilst East Devon's contends that its own employment land allocations only meet the District's own needs, the Draft East Devon Local Plan has identified 178 ha of employment land supply to meet a need for 80 ha generated by the East Devon economy (as determined by the EDNA). The Draft East Devon Local Plan appears to be meeting the long-established principle of considering need and supply across the FEMA. Without considering the principle of balancing supply and needs across Greater Exeter, East Devon's Plan could be seen as over-providing employment sites, leaving some sites vulnerable to proposals for alternative use.	Further work has been done in the development of the East Devon Local Plan strategy matching assessment of need with available sites. Our strategy seeks to deliver higher levels of self-containment within our existing settlements (42,3ha of employment land is allocated for this purpose), ensure a high level of self-containment within Marcombe (17.5ha) and Cranbrook (19.2ha), facilitate small scale growth of rural business sites (6.72ha) and continue to support the growth of our Enterprise Zone and adjacent areas (39.64ha). There are also sites already consented which amount to 51ha of the identified quantum which currently totals 176ha. Our strategy is tailored to meeting the needs of East Devon and its business community and does not expressly meet the needs of the city. There is some acknowledgement that growth within our enterprise zone and	
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				around the airport is meeting wider strategic needs, but this does not mean that it should be discounted from the city council's requirements.	
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7 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

- 7.1 The function of the city, local and district centres is changing. Retail is likely to be just one part of their future; a greater variety of uses need to be included in the centres to widen their attractiveness and appeal. Great care will need to be taken to protect the city centre from competition from out of centre retail to ensure its ongoing health.
- 7.2 The retail and future of our centres policy includes two policies which will help to address the future challenges facing our centres:
- RFC1: The future of our centres; and
 - RFC2: Development in, and affecting, within our centres.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 7.3 No representations were raised regarding the retail and the future of our centres chapter at Regulation 19 Publication stage.

8 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

- 8.1 The way we travel will be vital to the success of Exeter. It will be central to achieving net zero carbon, growing prosperity, healthy lifestyles and making improvements to our natural and historic environments. In future, travel will not just be about whether we walk or drive, digital communications will also be vital. The Exeter Plan will help to ensure that the city is resilient to changes in travel, supporting innovative development in the right places, providing real options and promoting fresh approaches to transport.
- 8.2 The sustainable transport and communications chapter of the Exeter Plan includes nine policies which will help to inform evolving transport and communications in the city:
- STC1: Sustainable movement;
 - STC2: The transport hierarchy;
 - STC3: Supporting active travel;
 - STC4: Supporting public transport;
 - STC5: Supporting more sustainable forms of car use;
 - STC6: Travel plans;
 - STC7: Safeguarding transport infrastructure;
 - STC8: Motorway service area; and
 - STC9: Digital communications.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 8.3 No representations were raised regarding sustainable transport and communications chapter at Regulation 19 Publication stage.

9 Strategic matters: Natural environment

Broad summary of chapter content

- 9.1 Exeter has a high quality natural environment, with Valley Parks and city parks, water bodies including the River Exe and the Exeter Ship Canal and many public rights of way. The hills surrounding the city give Exeter a distinctive landscape setting, whilst the city contains a rich variety of wildlife habitats. The Exeter Plan will be a key tool to accommodating appropriate development to meet the city's needs whilst protecting key natural environmental assets.
- 9.2 The natural environment chapter of the Exeter Plan includes seven policies which will help to accommodate development in a way which protects and enhances the natural environment:
- NE1: Landscape setting areas;
 - NE2: Valley Parks;
 - NE3: Biodiversity;
 - NE4: Green infrastructure;
 - NE5: Green circle;
 - NE6: Urban greening factor; and
 - NE7: Urban tree canopy cover.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 9.3 No representations were raised regarding natural environment chapter at Regulation 19 Publication stage.

10 Strategic matters: History and heritage

Broad summary of chapter content

- 10.1 Exeter's rich historic environment makes the city unique and continues to shape the city's culture and identity today. New development can raise challenges for our historic environment but the Exeter Plan provides an opportunity to conserve and enhance Exeter's heritage assets whilst exploring cultural links and celebrating the contribution of heritage to the character of the city.
- 10.2 The history and heritage chapter of the Exeter Plan includes five policies which will help to accommodate development in a way which protects and enhances the historic environment:
- HH1: Conserving and enhancing heritage assets;
 - HH2: Conservation areas;
 - HH3: Archaeology;
 - HH4: Heritage assets and climate change; and
 - HH5: Conserving and enhancing Exeter City Walls.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 10.3 No representations were raised regarding the history and heritage chapter at Regulation 19 Publication stage.

11 Strategic matters: Culture and tourism

Broad summary of chapter content

- 11.1 Exeter is a historic but modern city whose compact size and location means it offers a great balance between urban and rural life. Enhancing Exeter's cultural offering will be key to future success, building the sense of place and belonging in the city. Exeter is committed to being a healthy and active city with culture embedded as standard to enable people to live fulfilled lives. This will help to promote Exeter as a city of culture and further drive the identity and attraction of the city. The Exeter Plan seeks to protect existing culture and identity whilst supporting development to play its part in enhancing cultural provision.
- 11.2 The culture and tourism chapter of the Exeter Plan includes two policies which seek to explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination whilst specifying the role for development:
- C1: Protecting and enhancing cultural and tourism facilities; and
 - C2: Development and cultural provision.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 11.3 No representations were raised regarding the culture and tourism chapter at Regulation 19 Publication stage.

12 Strategic matters: High quality places and design

Broad summary of chapter content

- 12.1 The quality of the places in which we live and work and that we visit is fundamental for so many reasons, including to support our health and wellbeing, attract investment, generate pride in our city and help achieve our net zero ambitions. Development offers opportunities to create high quality places that respond to Exeter's distinct characteristics, reflect local culture and the historic environment, provide appropriate green space and integrate with existing communities, promoting social cohesion and healthy lifestyles.
- 12.2 The high quality places and design chapter of the Exeter Plan includes three policies which seek to deliver the development we need in high quality, liveable, connected places:
- D1: Design principles;
 - D2: Designing-out crime; and
 - D3: Advertisements.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 12.3 No representations were raised regarding the high quality places and design chapter at Regulation 19 Publication stage.

13 Strategic matters: Health and wellbeing

Broad summary of chapter content

- 13.1 The Exeter Plan will play a part in improving health and wellbeing by providing high quality housing, supporting job creation, enabling increases in physical activity, supporting active travel, enhancing nature, supporting improvements in air quality and supporting the delivery of the health infrastructure we need.
- 13.2 The health and wellbeing chapter of the Exeter Plan includes two policies which promote inclusive development which supports communities in becoming healthier and more active:
- HW1: Health and wellbeing; and
 - HW2: Environmental quality, pollution and contaminated land.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 13.3 No representations were raised regarding the health and wellbeing chapter at Regulation 19 Publication stage.

14 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

- 14.1 The Exeter Plan is vital in identifying the infrastructure that we need, ensuring it is provided in the right way, at the right time and in the right place. Working with key infrastructure partners will be essential to ensure that infrastructure needs can be met in this way. The City Council will continue discussions relating to cross-boundary infrastructure provision in the context of the development planned in Exeter but also close to the city in East Devon and Teignbridge and also Mid Devon.
- 14.2 The infrastructure and facilities chapter of the Exeter Plan includes five policies which will support the provision of appropriate infrastructure, address development viability and support the provision of community facilities, open space, play areas, allotments and sport:
- IF1: Delivery of infrastructure;
 - IF2: Viability;
 - IF3: Community facilities;
 - IF4: Open space, play areas, allotments and sport; and
 - IF5: New cemetery provision.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 14.3 No representations were raised regarding the infrastructure and facilities chapter at Regulation 19 Publication stage.

15 Site allocations

Broad summary of chapter content

- 15.1 The Exeter Plan allocates a series of sites for development. The site allocations (included in Policies H2 and EJ6) have been selected in accordance with the spatial strategy for the city set out in Policy S1.
- 15.2 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located close to the city centre or key public transport hubs. The sites are identified in Policy H2 and were part of the original Liveable Exeter work.
- 15.3 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2. These make up the balance of our housing requirement and provide for choice and competition in the market. The majority of the sites are brownfield in line with the spatial strategy. Some of the sites are greenfield, these sites helping to provide a mix of development opportunities to enable housing 135 delivery throughout the Plan period.
- 15.4 Three employment sites are allocated in Policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

- 15.5 ECC has been working closely with East Devon District Council throughout the plan-making process as set out in paragraph 1.6
- 15.6 At Regulation 19 stage EDDC made a representation expressing support for the co-ordinated approach to the delivery of infrastructure on sites north of Topsham but also stating that the policy test does not prevent the development from coming forward ahead of the production of the envisaged Infrastructure Delivery Framework or require them to only come forward in accordance with an agreed framework.
- 15.7 A duty to cooperate meeting was held on the 18 March 2025 to discuss possible modifications to address the concern outlined above. The suggested modification, of inserting additional non-prescriptive wording, was positively received.
- 15.8 The detail of the Regulation 19 representations and proposed responses is presented in the table below.

Issue	Element of the plan (policy or paragraph)	Organisation's representation	ECC comment	Organisation's comment	Final position and suggested plan modification
Topsham Infrastructure Delivery Framework	Policy T11	East Devon District Council consider (in respect of Policy T11 – Topsham Infrastructure Delivery Framework) - The co-ordinated approach to the delivery of infrastructure on sites north of Topsham within the city and within East Devon District under Policy T11 is welcomed, however the wording of this policy does not prevent the development of the allocated sites within the city from coming forward ahead of production of the envisaged Infrastructure Delivery Framework or require them to only come forward in accordance with an agreed framework.	Concerns acknowledged. Suggest insertion of an additional paragraph to require any major development proposal in the vicinity of Clyst Road and Newcourt Road, allocated or otherwise, to be informed by the content of the Topsham Infrastructure Delivery Framework: 'Major development proposals on the edge of Topsham between the M5, Exeter Road and Clyst Road will be required to come forward in accordance with the Topsham Infrastructure Delivery Framework when this is in place'.	Agree that concerns can be overcome with additional/revised wording in Policy T11 but this must require development to only come forward in accordance with an agreed Infrastructure Delivery Framework to ensure the timely delivery of infrastructure in step with housing.	Include additional paragraph after paragraph 16.36 to read: 'Major development proposals on the edge of Topsham between the M5, Exeter Road and Clyst Road will be required to come forward in accordance with the Topsham Infrastructure Delivery Framework when this is in place'.

16 Sustainability Appraisal and Habitats Regulation Assessment

Explanation of the SA and HRA

- 16.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 16.2 SA and HRA reports were provided for consultation alongside the Publication Regulation 19 draft of the Exeter Plan. Representors were able to provide representations on both these documents.

Addressing the response of East Devon District Council to the Regulation 19 Exeter Plan

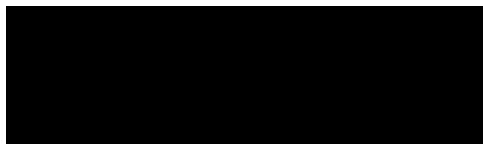
- 16.3 No representations were provided regarding the Sustainability Appraisal or the Habitat Regulations Assessment at Regulation 19 Publication stage.

17 Governance, review and signoff

- 17.1. The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon, or where there are areas of disagreement, this statement documents the issue, and that both parties confirm their respective position.
- 17.2. It is agreed that these discussions will inform the Examination of the Exeter Plan (the local plan). Both parties will continue to work collaboratively to meet the Duty to Cooperate obligations and will both continue to work proactively on the key strategic cross boundary issues identified in this document.

Date: 25.09.2025

Signed:

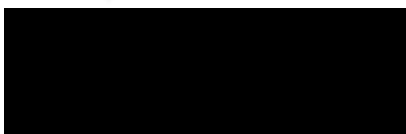


Name: Roger Clotworthy

Position: Head of City Development, Exeter City Council

Date: 25.09.2025

Signed:



Name: Ed Freeman

Position: Assistant Director Planning Strategy and Development Management

Appendix A:**ECC and EDDC: Strategic matters summary matrix**

Strategic matters	Agreement (Y) or outstanding issues (at time of submission) (X)
Spatial strategy	
Climate change	
Homes	
Economy and jobs	
Retail and the future of our centres	
Sustainable transport and communications	
Natural environment	
History and heritage	
Culture and tourism	
High quality places and design	
Health and wellbeing	
Infrastructure and facilities	
Site allocations	
Sustainability Appraisal	
Habitat Regulations Assessment	