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Via email to:

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Date: 26 September 2025

Dear Sir/Madam,

Re: Exeter Plan (Exeter Local Plan): Regulation 22 submission

In accordance with Regulation 22 of the Planning and Compulsory Purchase Act 2004 (as amended), Full Council approval to submit the Plan (dated 17 December 2024), and in accordance with the Service Level Agreement, Exeter City Council formally submits the Exeter Plan (Exeter Local Plan) and its supporting documentation to the Secretary of State for the Ministry of Housing, Communities and Local Government.

Exeter City Council has been working on the new Local Plan for Exeter, the Exeter Plan, since late 2020. The Plan has progressed through four rounds of consultation which culminated in the Regulation 19 Draft of the Plan being published in December 2024. This Regulation 19 version of the Plan is being submitted for Examination. Submission follows a Planning Inspectorate advisory meeting in March 2025.

Submission

The following documents are submitted for Examination.

- The Exeter Plan: Publication Plan - Regulation 19 version (the Submission Plan)
- The Regulation 19 version of the Policies Map (the Submission Policies Map)
- Schedules of potential suggested modifications to the Plan and Policies Map
- The regulation 22(1)(c) Statement of Consultation
- Statement of issues
- The Sustainability Appraisal Report
- The Habitats Regulation Assessment Report
- Representations in respondents order (received under Regulation 20)
- Representations in policy order (received under Regulation 20)
- The evidence base
- A Duty to Cooperate Statement and series of Statements of Common Ground
- A series of topic papers
- Other supporting documents which have informed the preparation of the Exeter Plan.

The Council has also listed a series of potential key issues which were identified from the representations received under Regulation 20. These are summarised in a Statement of Issues.

Finally, and in order to consider how some of these and other issues may be addressed, a Schedule of Suggested Potential Modifications and associated Schedule of Suggested Potential Modifications for the Policies Map have also been compiled to assist the Examination process. It may be that these could inform the hearings and future proposed modifications from the Inspectorate. The City Council asks that the Inspectorate recommends main modifications to the Plan as needed to address matters of soundness and legal compliance.

Issues

A series of key issues have been identified during the Regulation 19 consultation. These are summarised below:

- The need for a 15-year plan period from likely point of adoption
- Challenges to the spatial strategy including the need for more of a mix of brownfield and greenfield sites
- Net zero ambiguity
- Inappropriate approach to local energy networks
- Requirements for sustainable construction go beyond national standards
- Transitional arrangements for plan preparation and housing requirements.
- The need to plan for a larger number of homes.
- Demonstrating a five-year land supply
- Insufficient employment land allocated
- Overly restrictive focus on transformational sectors
- Loss of employment at the strategic mixed use brownfield allocations
- Scale of retail provision at the East Gate and Exe Bridges Retail Park strategic mixed use brownfield allocations
- The need to make reference and commitment to the delivery of the Greater Exeter Transport Study and key transport policy documents such as the Local Transport Plan and Exeter Transport Strategy.
- Inappropriate strength of protection for the landscape setting areas.
- Inappropriately restrictive protection for the Valley Parks, including private land, and scope of boundaries.
- Insufficient protection provided to heritage assets in the city, both designated and non-designated, by the various policies in the history and heritage chapter and in the context of strategic brownfield development.
- Planning contributions towards GP provision
- Education infrastructure needs, particularly primary school provision.
- Detail of viability review mechanisms at planning application stage.
- Detailed representations regarding the two policies covering community facilities, open space, play areas, allotments and sports facilities.
- SBA1: Water Lane: Issue 1: Primary school site area required.
- SBA1: Water Lane: Issue 2: Potential to deliver affordable housing.
- SBA2: East Gate: Issue 1: The potential heritage impact of development: Conservation Area, Listed Buildings, archaeology and historic views.

- SBA2: East Gate: Issue 2: The suggested need for a replacement police-base to be provided in order to enable the development of part of the East Gate allocation and the need for associated contributions.
- SBA4: Exe Bridges Retail Park: Issue 1: The likely delivery of development at the allocation towards the end of the plan period.
- SBA4: Exe Bridges Retail Park: Issue 2: The need to provide for the continued retail function at the site.
- SBA5: South Gate: The potential heritage impact of development: Conservation Area, Listed Buildings, archaeology and historic views.
- EJ6: Employment: St Luke's Campus, Heavitree Road: Heritage considerations.

A number of these issues are being, or have been, addressed in Statements of Common Ground with relevant bodies.

Examination

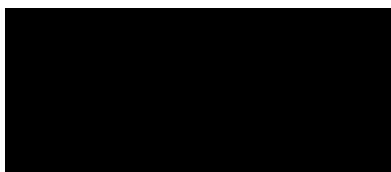
The Exeter Plan is a full local plan containing a vision, spatial strategy, strategic policies, development management and site allocations. On this basis, the Examination may require approximately 12-16 sitting days. A total of 47 representors have indicated they would like to attend the examination hearings.

To support the Examination of the Exeter Plan, we have appointed a Programme Officer. His details are below:

Name:	Robert Young
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We look forward to being informed of the appointed Planning Inspector. If you have any questions, please do not hesitate in contacting me.

Yours faithfully,



Ian Collinson
Strategic Director for Place