



EXAMINATION OF THE EXETER LOCAL PLAN

MATTER 9: SITE ALLOCATIONS

ISSUE 2 - POLICY SBA2 - EAST GATE

HEARING STATEMENT

PREPARED BY:

**DEVON & CORNWALL POLICE & THE OFFICE OF THE
POLICE & CRIME COMMISSIONER FOR DEVON &
CORNWALL, AND THE ISLES OF SCILLY (OPCC)**

APRIL 2026

CONTENTS	PAGE
Declaration and Personal Statements	
1. Introduction	6
2. Legal Duty and Relevant Planning Policy	9
3. Further Evidence to Support the Need for a City Centre Police Base	11
4. Response to Inspectors' Questions 6 & 9	14
5. Conclusion	16

APPENDICES (separate files)

M9-DCP1	Suggested Modifications to Exeter Local Plan, Policy SBA2 (East Gate) proposed by ECC to DCP on 4 th February 2026
M9-DCP2	Statement of Common Ground (SoCG) agreed between Exeter City Council and Devon and Cornwall Police & OPCC, April 2026
M9-DCP3	Amendments proposed by DCP to Suggested Modifications made by ECC on 9 th March 2026
M9-DCP4	Suggested amendments made by ECC to Local Plan Policy SBA2 on 27 th March 2026, and DCP's response of 30 th March 2026
M9-DCP5	Further suggested amendment proposed by ECC to DCP dated 2 nd April 2026, and DCP's response on 2 nd April 2026
M9-DCP6	Further suggested amendment proposed by ECC to Policy SBA2 on 7 th April, including DCP's response on 8 th April 2026, further response from ECC, and DCP's final position of 8 th April 2026
M9-DCP7	Extract of Working Paper (2025) produced for the Institute of Fiscal Studies by Elissa Facchetti: 'Police Infrastructure, Police Performance and Crime: evidence from austerity cuts'

Declaration and Personal Statements

The evidence which Devon & Cornwall Police together with the OPCC have prepared and submitted to the Exeter Local Plan Examination within this Hearing Statement is true. It has been prepared and is given in accordance with the guidance of the Royal Institute of Chartered Surveyors and the Royal Town Planning Institute. We can confirm that the opinions expressed are our true and professional opinions.

This Statement has been produced by the following Devon and Cornwall Police staff and contractors:

Iain Masters MRICS, Development Manager

My name is Iain Masters. I am Chartered Surveyor with over 40 years property development and estate surveying experience. I have worked extensively on property matters in both the private and public sectors. I hold a BSc in Estate Management from Birmingham City University (then Birmingham Polytechnic). I qualified as a Chartered Surveyor in 1993.

Since April 2019, I have held the position of Estate & Development Manager for Devon & Cornwall Police and the Isles of Scilly, having initially worked as a consultant advisor to the Police from November 2017. The sub-team that I lead within the Property Department is responsible for general estate management duties and the promotion and feasibility assessments associated with estate change. I also manage a small team of internal and external consultants who secure developer contributions to fund police infrastructure, and who make planning representations to local authorities to ensure that council planning policies properly support operational policing. In this capacity, I am responsible for matters in relation to possible 'estate change' in Exeter City Centre which concerns the Exeter Local Plan.

The information and evidence in this Statement which has been prepared by me - together with Fiona Jury MRTPI of Devon & Cornwall Police - are given in accordance with the guidance of the RICS, and I can confirm that the views expressed are my genuine professional opinions.

Fiona Jury MRTPI, Planning Advisor

My name is Fiona Jury. I am an in-house Planning Advisor to Devon & Cornwall Police and the Isles of Scilly. I am retained by the Police to provide specialist advice on Town Planning matters in relation to the Exeter Local Plan, and more widely across Devon and Cornwall concerning possible estate change.

I hold a BA (Hons) in Town and Country Planning and Bachelor of Town Planning from the University of the West of England, together with a Masters in Business Administration from Henley Management School (now University of Reading). I have been a Chartered Member of the Royal Town Planning Institute since 1997, and have 30 years' experience as a town planner, holding roles in both planning consultancy and with National housebuilders.

This information and evidence within this Statement on matters in relation to town planning is given in accordance with the guidance of the RTPI. I can confirm that the views expressed are my genuine professional opinions.

Inspector Nathan Johnson, Neighbourhood Team (City and West) Inspector

My name is Inspector Nathan Johnson, and I am responsible for the neighbourhood policing of Exeter city centre, and the west of the city.

I joined Devon and Cornwall Police in 2004, initially as a response officer before specialising in Public Order in 2009 at a time of significant national change where I was deployed to the London

Riots, EDL marches, and conducted a capability and capacity study of the Royal Falkland Island Police's ability to respond to protest.

I was seconded to the College of Policing Public Order Unit in 2012 where I conducted compliance visits of Forces and was integral to the selection, training and deployment of GB police to PSNI for the G8 / marching season.

I returned to Devon and Cornwall in 2014 on temporary promotion as a sergeant in the contingency planning unit before being substantively promoted to lead a response section in Exeter. During this time, I have continued to teach public order command in post conflict environments with the College of Policing in both Zanzibar and Sierra Leone, and completed the CEPOL European Future Leaders' Program in Budapest during 2016.

I moved to Force Support Group, qualified at a Police Search Advisor and conducted a number of high-profile operations within Force and on mutual aid.

In 2020, on promotion to Inspector, I led the planning in relation to the protest of the G7 summit in Cornwall. On completion of the operation, I moved across to firearms where I qualified as a Tactical Firearms Commander and led the Tactical Firearms Team.

I moved to community policing in 2024, taking up my current role based in Exeter city centre.

The information and evidence within this Statement which concerns the operational policing of Exeter city centre is based on my own professional experience, knowledge of the city centre, together with the local community.

Inspector David Turner, Sector Inspector for Exeter East and North

My name is Inspector David Turner and I am responsible for the neighbourhood policing of Exeter East and North.

I joined Devon and Cornwall Police in 2003, and was posted to Exeter as a response officer. I remained in this post, working in Exeter until 2008 when I was promoted to the rank of Sergeant.

My first posting as Sergeant was to response, based in Exmouth, where I worked for 2 years.

I then moved back to Exeter, where I worked as a custody sergeant for 7 years.

From custody, I then moved to the Exeter Neighbourhood Team, where I worked as the Neighbourhood Team Leader for Exeter City Centre and St Davids. I covered this role for 2 years.

In 2019, I obtained the rank of Inspector. My first role was as Geographic Support Inspector. I was based in Exeter. The role entailed providing strategic support to the Superintendent/Chief Inspector in charge of the Exeter, East and Mid Devon local policing area.

In 2024, I took up my current role as Sector Inspector for Exeter East and North based in Exeter city centre. I am responsible for managing teams of officers and planning daily operational policing; I also lead on responses to critical incidents to ensure that resources are deployed effectively and efficiently.

In the period covering the last 12 months, violence and sexual offences have been the most reported crime in Exeter city centre, followed by anti-social behaviour and then shoplifting. This is confirmed by the up-to-date data provided from the Police Crime Map. As such, I understand the nature of these threats and the implications for day-to-day life which underpin the essential need for a city centre Police base.

The information and evidence within this Statement which concerns the operational policing of Exeter city centre has been informed by my own professional experience, knowledge of the city centre together with the local community.

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Devon & Cornwall Police (DCP) and the Office of the Police & Crime Commissioner for Devon & Cornwall (OPCC) and the Isles of Scilly (together the Police) in respect of **Matter 9, Issue 2, Policy SBA2** of the Exeter Local Plan Examination. A separate Hearing Statement has been submitted in relation to Matter 14, Issue 3, Policy IF3 which concerns the provision of Infrastructure.
- 1.2 The Police's objection relates to the representation submitted to the Local Plan (Regulation 19) on 6 February 2025 to Policy SBA2 which as originally drafted was silent on the reprovision of the Police's existing city centre base/office situated within East Gate.
- 1.3 The Police continue to object to the draft Local Plan on the basis that adequate police infrastructure and facilities are critical for the provision of the safety and security of the public and to accord with the overall objectives of the NPPF in creating safe places. There should also be consistency with the objectives for maintaining safety and security throughout the relevant policies within the Exeter Local Plan.
- 1.4 Exeter City Council (ECC) and the Police have cooperated on strategic matters in the preparation of the Exeter Plan, with discussions continuing up to the production of this Hearing Statement.
- 1.5 Effectively on 4th February 2026, ECC recognised that it should be a requirement of Policy SBA2 to provide a replacement city centre Police base as part of the East Gate scheme. As such, Officers confirmed to DCP (in **Appendix M9-DCP1**) that they were content to amend Policy SBA2 to require the reprovision of "*accommodation appropriate for a city centre police base including office and public enquiry space*" within the scheme.
- 1.6 Unfortunately, in the subsequent discussions with ECC this commitment was watered down, and the clear acknowledgement to make the replacement Police Station a requirement of Policy SBA2 has not been followed through in the Statement of Common Ground ((SoCG) at **Appendix M9-DCP2**). A summary of the discussions which have taken place between ECC and the Police prior to agreeing the SoCG is set out below, as background for the Inspectors'.
- 1.7 On 4th February 2026, ECC confirmed that they were content to suggest the following potential amendment to Policy SBA2 which is confirmed in **bold** below:

The following will be required:

C. Social, community and cultural infrastructure including:

v. Contributions to GP provision

vi. Accommodation appropriate for a city centre police base including office and public enquiry space

This reflected ECC's clear acceptance that East Gate which currently contains a Police Station should be re-provided within the redevelopment proposed under Policy SBA2.

- 1.8 In order to reflect the need for the appropriate continuity in the provision of a city centre Police base, the Police suggested one further amendment to Policy SBA2 C.vi. on 9th March 2026 to ECC (**Appendix M9-DCP3**) which confirmed (our underlining):-

“The following will be required:

C. Social, community and cultural infrastructure including:

vi. Accommodation appropriate for a city centre police base including office and public enquiry space to provide appropriate continuity of provision.

- 1.9 On 27th March 2026, ECC proposed an updated version of the modification to Policy SBA2 C.vi. that they were content to consider (**Appendix M9-DCP4**), but unfortunately this did not secure the essential point of resecuring the provision of the Police Station:

“The following will be required:

C. Social, community and cultural infrastructure including:

vi. Flexible space, which could accommodate a city centre police base (including office and public enquiry space) as may be required for continuity of provision, or retail/commercial space.

- 1.10 On 30th March 2026, the Police raised their concerns with ECC (also within **Appendix M9-DCP4**) that the potential revision to Policy SBA2 C.vi. which now included “flexible space which could accommodate a city centre police base.....or retail/commercial space” failed to provide them with the reassurance that the existing Police base would be replaced as part of the East Gate development. Furthermore, the previous reference to “appropriate accommodation” had been deleted by ECC.

- 1.11 The Police engaged in a subsequent discussion with ECC on 2nd April 2026. ECC reinstated the word “appropriate” in response to the Police’s express requirement for suitable accommodation to be provided for a replacement city centre Police base as part of East Gate (within **Appendix M9-DCP5**). The Police also requested the following revision (underlined below, and at **Appendix M9-DCP5**) to Policy SBA2C.vi to provide them with sufficient certainty that:

“The following will be required:

C. Social, community and cultural infrastructure including:

vi. Appropriate flexible space, which would accommodate a city centre police base (including office and public enquiry space) as may be required for continuity of provision, or retail/commercial space, unless the Police have secured suitable alternative accommodation.

- 1.12 Whilst ECC confirmed on 2nd April 2026 (also within **Appendix M9-DCP5**) that they were content to amend “could” to “would”, they did not favour including “unless the Police have secured suitable alternative accommodation” for the reason that it provided “too much of an open-ended position” for Policy SBA2, and wouldn’t “be effective in supporting the wider development of the site as it comes forward.”

- 1.13 A further potential iteration of Policy SBA2C.vi was suggested by ECC on 7th April 2026 (**Appendix M9-DCP6**) which stated (changes shown in **bold** and underlined):

“The following will be required:

C. Social, community and cultural infrastructure including:

vi. Appropriate, flexible space, which would accommodate a city centre police base (including office and public enquiry space) as may be required for continuity of provision, and/or retail/commercial space.”

1.14 The Police confirmed to ECC on 8th April 2026 (at **Appendix M9-DCP6**) that the revision failed to provide them with sufficient certainty to address their concerns. Furthermore *“the proposed wording would still allow the space to be delivered either wholly as retail/commercial use, or as a mixed-use scheme, which could reduce the scale, configuration or operational suitability of any police facility. Therefore, as drafted, the policy affords limited assurance that a fully functional city centre police base can be accommodated.”*

1.15 ECC in their response (at **Appendix M9-DCP6**) to the Police on 8th April 2026 confirmed that *“we’re not convinced that a police base is an absolute requirement given that your brief shows a large area of search for such a facility across the whole city centre, not just East Gate.”* However, *“a final potential version”* of Policy SBA2C.vi. which is set out in the SoCG *“could be:*

vi. accommodation appropriate for a city centre police base as may be required for continuity of provision, and/or retail/commercial space”

1.16 The Police confirmed on 8th April 2026 (at **Appendix M9-DCP6**), that ECC’s final potential version of SBA2C.vi still did not provide the Police with sufficient certainty to address their concerns that a fully functional city centre police base will be accommodated in the scheme.

1.17 Notwithstanding these points, the Police consider that this issue can be resolved through the following Modification to Policy SBA2C.vi. which is confirmed in the SoCG that reflects ECC’s suggested amendment of 4th February 2026, together with the additional revision requested by the Police on 9th March 2026 to provide *“appropriate continuity of provision:”*

“The following will be required:

C. Social, community and cultural infrastructure including:

vi. Accommodation appropriate for a city centre police base including office and public enquiry space to provide appropriate continuity of provision.”

1.18 It follows that the Modification that DCP has suggested in the SoCG is extremely close to the potential amendment to Policy SBA2 that ECC Officers were content to suggest to DCP in their email of 4th February 2026, and which would have been acceptable with the inclusion of *“appropriate continuity of provision.”*

1.19 The justification for seeking the above Suggested Modification is covered within this Statement in the response to the Inspectors’ Questions.

1.20 Notwithstanding this, ECC has agreed with the Police to update paragraph 16.16 of the Local Plan which provides the explanatory text for Policy SBA2 to include *“policing provision”* within the description of the current uses within East Gate. This is agreed within the SoCG.

1.21 The purpose of this Statement is to assist the Inspectors’ in understanding the implications of the draft Local Plan on operational policing within the city centre and to provide the justification for the agreed and proposed Suggested Modifications to Policy SBA2 which are necessary to make the Plan sound. It gives an overview of the statutory duty under Section 17 of the Act (1998) placed on local authorities to consider crime and disorder implications, together with the relevant planning policy and justification to support the need for a

replacement Exeter city centre Police base. It also addresses the questions raised by the Planning Inspectors' in relation to Matter 9, Issue 2, Policy SBA2, but focuses upon those which relate to this objection.

- 1.22 The Police's evidence has been prepared and submitted in accordance with the statutory duty of the Police and Crime Commissioner (PCC) to secure an efficient, and effective police force for Devon & Cornwall Police (Part 1 of the Police Reform and Social Responsibility Act 2011, and Policing Protocol Order 2023).

2.0 LEGAL DUTY & RELEVANT PLANNING POLICY

2.1 SECTION 17 DUTY

- 2.2 Section 17(1) of the Crime and Disorder Act 1998 imposes a statutory duty on all local authorities to consider crime and disorder implications. It states that *"it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,*

- (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and*
- (b) the misuse of drugs, alcohol and other substances in its area; and*
- (c) re-offending in its area; and*
- (d) serious violence in their area."*

- 2.3 It is difficult to see how a local authority whom are promoting a Local Plan which proposes to remove a city centre Police Station within Policy SBA2 are doing all that they can to prevent *"crime and disorder"* as required by the statutory duty imposed on them under Section 17 (1) of the Act.

- 2.4 Section 17(1) (A) of the 1998 Act provides that *"The duty imposed on an authority by subsection (1) to do all it reasonably can to prevent serious violence in its area is a duty on the authority to do all it reasonably can to-*

- (a) prevent people from becoming involved in serious violence in its area, and*
- (b) reduce instances of serious violence in its area."*

- 2.5 It follows that local (planning) authorities must exercise their functions with due regard to the likely effects of those functions on, and the need to do all that it reasonably can to prevent serious violence in its area.

- 2.6 As a result, when formulating policy and when determining planning applications for any new development within its administrative area, ECC must comply with the above Section 17 duties, otherwise there is a risk of challenge to such policy and planning decisions.

- 2.7 The Police have made it clear within their representation to Policy SBA2 that there is a compelling need for appropriate Police infrastructure within the city centre, and as such it is necessary to do all that they reasonably can in partnership with ECC to prevent the types of behaviour set out in Section 17 of the 1998 Act. Therefore, to assist with complying with its Section 17 duty, the Exeter Local Plan must acknowledge the Police's needs for sufficient provision of policing facilities and continuity in Policing provision through the Suggested Modifications and further amendments proposed to Policy SBA2.

2.8 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 2.9 The creation of safe and accessible environments where crime and disorder, and the fear of crime does not undermine the quality of life or community cohesion is a key part of planning for sustainable development and communities as outlined in paragraph 8b), 96b), 98c), 101, 102 & 135f) of the NPPF.
- 2.10 Paragraph 8 explains that *“Achieving sustainable development means that the planning system has three overarching objectives.”* Paragraph 8b) sets out the second of those objectives, which is a social objective *“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and **safe places**, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.”* It is clear in its objectives for sustainable development, that the NPPF recognises **“safe places, with accessible services”** as key.
- 2.11 Paragraph 96 confirms that *“planning policies and decisions should aim to achieve healthy, inclusive and **safe** places which:b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion....”*
- 2.12 Paragraph 98 of the Framework states that **“to provide the social, recreational and cultural facilities and services the community needs, policies and decisions should:c) guard against the unnecessary loss of valued facilities and services that serve community needs, particularly where this would reduce the community’s ability to meet its day-to-day needs.”** The existing Exeter Police base within the Civic Centre supports the role of the city centre and serves the day-to day needs of local communities by seeking to create a safe place to live, work and visit (our underlining).
- 2.13 Paragraph 101 of the NPPF requires decision-makers to give *“significant weight”* to the importance of delivering *“new, expanded or upgraded public service infrastructure when considering proposals for development”* with *“public service infrastructure”* being recognised *“as health, **blue light**, library, adult education, university and criminal justice facilities.”* The express reference to the importance of *“blue light”* services together with the *“significant weight”* to be attributed to the faster delivery of these facilities which includes police infrastructure should positively influence the planning balance when considering new development proposals.
- 2.14 Paragraph 102 of the NPPF requires that planning policies and decisions should promote public safety and take into account wider security and defence requirements. It specifically states that **a).....“Policies for relevant areas (such as town centre and regeneration frameworks)...should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications.”** The Police advising ECC of its policing requirements as a result of the developments within the city is evidence of the engagement which the NPPF encourages, including the preparation of the emerging Exeter Local Plan 2021 - 2041. As such, the evidence provided from Inspector David Turner within Section 3 of this Statement will update the Inspectors’ *“about the nature of the potential threats and their implications”* and has been informed by his operational policing experience and detailed knowledge of the types of crime and emergency incidents that occur in the city centre.

2.15 Paragraph 135 of the NPPF states that “*Planning policies and decisions should ensure that developments.....f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, does not undermine the quality of life or community cohesion and resilience.*” For the Exeter Local Plan to promote the redevelopment of the East Gate site without providing a Police Station would risk crime and disorder, and the fear of crime increasing, and this could potentially undermine the quality of life for residents, visitors and for those who work in the city as well.

2.16 EXETER PLAN: PUBLICATION PLAN: REGULATION 19, DECEMBER 2024

2.17 The Exeter Local Plan recognises the need for safe environments, for example Policy H16 considers residential amenity and healthy homes. It requires that “*new homes must provide safe and healthy living conditions and good standards of amenity for future occupiers.*” It confirms that one such factor that will be considered in providing safe and healthy living conditions is: “*g. security.*”

2.18 Policy D2 sets out the Council’s approach to designing-out crime by emphasising the integration of crime prevention measures into the design process to reduce crime, fear of crime and anti-social behaviour. It states that “*development proposals will be supported where they demonstrate that crime prevention and creating a safe environment have been effectively integrated into the design of the scheme.*” More specifically, it confirms that “*Development proposals should:*

- a. Be designed with management and maintenance in mind to discourage crime, fear of crime and antisocial behaviour;*
- g. Include appropriate, well-designed security features to support passive, safe design.”*

2.19 Policy IF3 under the heading of ‘Infrastructure’ sets out the approach for the protection of existing, and delivery of new, community facilities in the city. The agreed Suggested Modifications proposed by ECC which are reflected in the SoCG to include “*policing*” within Policy IF3 as a community facility to be protected, together with the references to “*policing infrastructure,*” “*safety*” and “*security*” within paragraph 15.18 is confirmation of the need to protect policing infrastructure, so as to be consistent with paragraphs 96b) and 98c) of the NPPF.

3.0 FURTHER EVIDENCE TO SUPPORT THE NEED FOR A CITY CENTRE POLICE BASE

3.1 A permanent city centre police base in Exeter is essential for maintaining public trust and confidence in policing. Owing to the importance of this issue, the decision to prepare for the Exeter Local Plan and instruct Leading Counsel in this matter has been approved by the appropriate governance processes within DCP together with the OPCC.

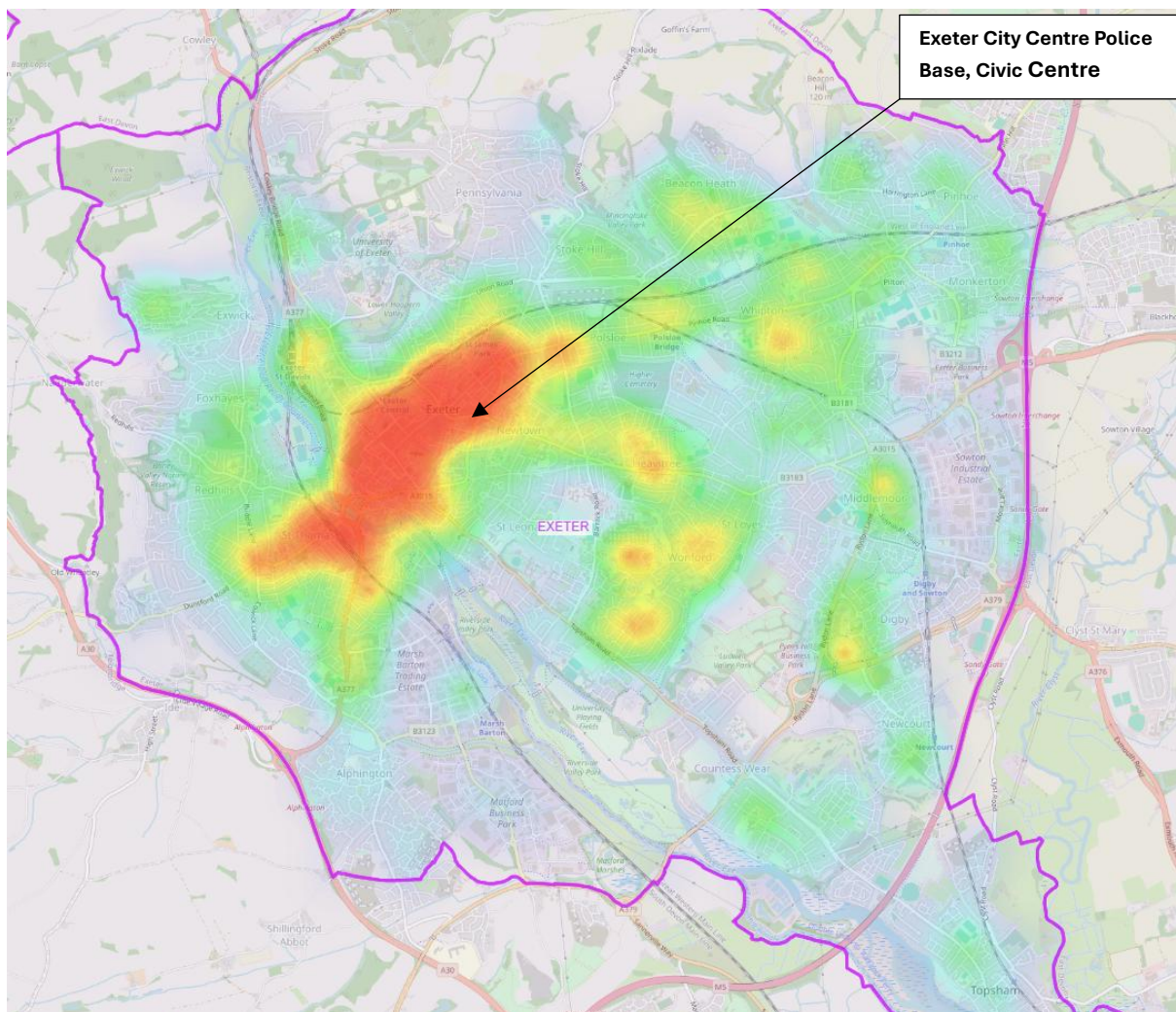
3.2 In the ‘Case for Cities’ Report (September 2025) prepared by Inner Circle Consulting on behalf of a coalition of fast-growing smaller cities of national significance to support local government reorganisation, it was recognised that “*Exeter is one of the UK’s fastest-growing cities, an economic engine for the South West and a national leader in climate science, health innovation, and advanced research. It is home to the Met Office, Exeter Science Park, and a globally ranked university that contributes over £540 million to the local economy. Exeter’s strength lies not only in its institutions and strong partnerships, but in its ability to connect people, places, and ideas, across towns, rural areas, and coastal communities.*” As such, the city centre plays a key role in supporting the level of growth

and development that is envisaged for Exeter as a successful “*regional connector*” and it is essential that it provides a safe place to live, work and visit. Without a city centre Police base, Exeter would be one of only a small number of regional cities across the south-west of England that is not served by centrally located policing facilities.

- 3.3 The provision of a dedicated police base in the city centre is essential for delivering effective, visible policing and reducing violent and crime, particularly in high-demand locations such as Exeter High Street which ranks second in the Force’s geographical area for ‘Hotspot’ crime demand. Hotspot Policing is a data-driven Home Office initiative that was implemented by DCP in 2024 to combat high concentrations of anti-social behaviour (ASB) and serious violence in the city centre. By positioning Officers at a central base it enables immediate deployment on foot patrols to identified ‘Hotspot’ areas which ensures a rapid, high-visibility presence that deters offending and reassures the public. This is especially critical for the evening and night-time economy, where policing operations focused on violence against women and girls rely on Officers being centrally located, briefed, and ready to respond without delay. This is far more effective in matching the density and movement of people, than remote or reactive policing models.
- 3.4 The existing Police base also supports the policing for the many city centre events and protests that require a coordinated and visible Police presence. Visibility on foot not only deters offending but also increases opportunities for early intervention and positive engagement. By aligning the policing presence and response times with the threats to the city centre this can prevent incidents from escalating.
- 3.5 The existing city centre base also plays a vital role during peak periods such as Friday and Saturday nights, providing a hub for operational briefings, welfare facilities, and undertaking report writing, which significantly reduces non-deployable time compared to travelling back to a Police Station on the edge of the city. This efficiency keeps Officers on the streets for longer, making deployments more effective and directly contributing to crime reduction.
- 3.6 Over time, having the continuity of location within the city centre helps to build meaningful relationships between officers and the community, fostering familiarity and approachability. When the public know where to find their local officers, and see consistent faces operating from a stable base, it strengthens legitimacy and supports the shared goal of a safer community. The need for visible policing to rebuild the trust between local communities and the Police has been reiterated by the Rt Hon Yvette Cooper MP, Home Secretary in a Ministerial Statement made on 19th November 2024 for the reason that “*we’ve seen visible neighbourhood policing decimated in communities across the country, with fewer police on the beat, breaking the vital link between local forces and the people they serve.*”
- 3.7 The continuity in provision of a city centre base is also critical in delivering the priorities set by Police and Crime Commissioners, particularly those focused on protecting town and city centres, reducing violence, and tackling antisocial behaviour. A consistent operational hub supports partnership working with local authorities, businesses, and support services, ensuring coordinated and sustained efforts rather than fragmented responses. Maintaining this base demonstrates a long-term commitment to Exeter’s city centre, reinforcing strategic objectives while delivering tangible benefits to those who live, work, and visit there - ultimately contributing to a safer community.
- 3.8 The **Heat Map (M9-DCP-Map 1)** which has been produced below for Exeter city centre shows the crime and ASB incident locations in the previous 90 days (dated 17th March

2026). This is a record of all emergency graded incidents. For context, the location of the existing Police Station within the Civic Centre on the Heat Map is also identified in the area coloured red (not drawn to scale).

- 3.9 As such, the Heat Map shows why it is essential bearing in mind the threats, that there is a Police presence in the city centre owing to the concentration of these incident locations. Without this provision being in place, evidence produced by the Institute for Fiscal Studies (2025) on 'Police Infrastructure, Police Performance and Crime' has found that the closing of Police buildings leads to an increase in crime. It also concluded that **(Appendix M9-DCP7)** *"police infrastructure plays a crucial role in the optimal provision of public safety. Police proximity is not just about emergency response times; it also fosters stronger police-community interactions, and deterrence. As law enforcement represents the state, any erosion in its perceived legitimacy can weaken public trust and engagement with public institutions."* This further justifies why it is essential for appropriate accommodation for policing infrastructure to be provided within the city centre through the Main Modification proposed by the Police to Policy SBA2 C.vi.



M9-DCP-Map1 - Heat Map for Exeter City Centre (all emergency graded incidents recorded in the previous 90 days to 17-03-2026)

Source: Devon & Cornwall Police, and the Isles of Scilly

4.0 RESPONSE TO INSPECTORS' QUESTIONS IN RELATION TO POLICY SBA2

- 4.1 The Police's response to Issue 2, Policy SBA2 concerns Questions 6 and 9 only.
- 4.2 **Question 6 - Is it sufficiently clear what is expected of applications for planning permission in respect of additional infrastructure requirements such as police infrastructure?**
- 4.3 Within the SoCG, ECC recognises that accommodation appropriate for a city centre police base (including office and public enquiry space) will be a requirement of Policy SBA2, however, the inclusion of "*and/or retail/commercial space*" within the proposed amendment to C.vi. is unhelpful, as it fails most importantly to secure the essential provision of a Police Station within the scheme.
- 4.4 If the Police's proposed Modification to Policy SBA2 to include "*C.vi Accommodation appropriate for a city centre police base including office and public enquiry space to provide appropriate continuity of provision*" is made which is very similar to the potential amendment suggested by ECC on 4th February 2026, then it would resolve the Police's objection to Policy SBA2. This would provide them with the certainty that they need in order to meet their operational requirements for the policing of the city centre.
- 4.5 It follows that the Council have recognised in Policy IF3 within the Modifications agreed in the SoCG that "*policing*" is as an 'existing community facility' that should be protected. It would therefore be peculiar for the Local Plan to promote the redevelopment of Policy SBA2 without providing a replacement Police Station. The Police's proposed Modification to Policy SBA2 is consistent with the protection provided to "*policing infrastructure*" under the Modification to paragraph 15.18, and "*policing*" in Policy IF3 agreed with ECC. In contrast, ECC's version in the SoCG affords limited protection that a fully functional city centre police base can be accommodated within East Gate.
- 4.6 The Police have provided further evidence in support of the essential need for a city centre Police base within Exeter, and ECC recognises the requirement to re-provide appropriate accommodation for them in the SoCG. However, the Council is not convinced that it should be a scheme requirement of East Gate for the reason that the Police's brief for replacement accommodation which was provided to ECC, has a larger search area, not just within East Gate. In the course of the discussions with ECC Officers, DCP have been open and transparent as to the Police's requirements for a city centre Police base. Whilst it is acknowledged that the area of search showed a larger area beyond East Gate in the city centre, the Police maintain that the level of protection under planning policy is not limited by the expiry of the lease on the existing Police Station at the Civic Centre.
- 4.7 The Police contend that by bringing forward a replacement site within the East Gate scheme which the existing Police Station is already part of, then it would guard against the loss of a valuable Police Station which is protected within planning policy. This is supported by the Modification to Policy IF3 that has been agreed in the SoCG to include "*policing infrastructure*" as a community facility that should be protected, so it is consistent with paragraph 98c) of the Framework. The Suggested Main Modification to paragraph 15.18 also recognises that policing infrastructure is "*essential for ..safety*". This would of course include the city centre Police Station. The agreed modification of Policy IF3 unsurprisingly protects existing facilities for policing unless very stringent criteria were to be met. There is no suggestion that the redevelopment of Policy SBA2 would meet those criteria. Therefore, the policy both under National Policy in particular 98c) of the Framework and under the Exeter Plan itself protects the Police Station. In order to be consistent with this protection, it is necessary that the redevelopment, if it demolishes the Police Station only reasonably

provides another one with continuity. The protection in planning terms for the sui generis Police station is of course not defeated regardless of the length of lease that exists.

- 4.8 Notwithstanding this, it is extremely difficult to find an alternative site for a replacement city centre Police base site that is able to provide appropriate accommodation to fulfil the Police's operational requirements. Not only is the location key, so that incident response target times can be met, but the accommodation should be self-contained and have access to on-site car parking to enable blue light vehicles to be deployed quickly.
- 4.9 Therefore, it is only reasonable that the city centre Police base is replaced and it should be an absolute development requirement of Policy SBA2; this should be irrespective of the expiry of the existing lease for the Police's accommodation within the Civic Centre in 2028. A failure to provide for this, would lead to the unnecessary loss of an existing and valuable facility, and moreover *"would reduce the community's ability to meet its day-to-day needs"* as required by paragraph 98c) of the NPPF. It would also result in the loss of an essential facility for *"safety"* as reflected in the agreed Modification to paragraph 15.18 of the Plan and as such fail to afford the protection required by Policy IF3, as modified.
- 4.10 The potential amendment to Policy SBA2 C.vi. proposed by ECC to include *"and/or retail/commercial use"* within the requirement for the city centre Police base is also unacceptable to the Police. It would mean that it does not require the replacement of the Police Station and wouldn't comply with the Section 17 duty under the Act, or NPPF policy.
- 4.11 It could also result in the space being provided entirely as retail or commercial space, with no Police base at all, even if no suitable alternative accommodation has been secured. It may also potentially allow for a mixed-use arrangement, where Police space is combined with other commercial or retail uses. In practice, this could potentially reduce the amount, layout or usefulness of the Police accommodation, as the design is likely to be driven by wider considerations. So, even if the Police use is included within SBA2C.vi., there is a real risk that it would end up being compromised or scaled back. As such, there is no clear link in Policy SBA2C.vi between losing or reducing Police facilities in the city centre and making sure a replacement is provided.
- 4.12 On the basis that ECC's Local Plan is proposing to remove an existing community facility that is protected within planning policy, it is reasonable to expect the East Gate scheme to replace the Police Station and bear some of the cost of this. The Police are unable to finance the full replacement cost, without funding from either s106 developer contributions or CIL; and therefore for this reason, it should be funded by variety of funding sources, as proposed by the amendment to the IDP identified in the SoCG. This is addressed further in DCP's Hearing Statement on Matter 14, Issue 3, Policy IF3.
- 4.13 There is also the issue of the need for continuity in the provision of Policing within the city centre. The Police cannot afford to be without any facilities once the Civic Centre is demolished to enable East Gate to be brought forward. Applications for planning permission should be aware that it is essential that there is appropriate continuity in provision to enable the effective Policing of the city centre. Therefore, the phasing of the development should reflect and properly plan to provide for this. ECC have recognised the need for *"continuity of provision"* however, their proposed amendment confirmed in the SoCG to provide *"accommodation appropriate for a city centre police base"..... "as may be required for appropriate continuity of provision"* is not acceptable, for the reason that it fails to provide the Police with sufficient certainty that there would be no break in provision. This could mean that the city centre would be without a Police base for whatever period of time. The Police continue to recommend to the Inspectors' the following proposed Main Modification to Policy SBA2 which would resolve this issue:

“C.vi Accommodation appropriate for a city centre police base including office and public enquiry space to provide appropriate continuity of provision”

4.14 Question 9 - What is the justification for the suggested modifications to Policy SBA2 and its supporting text? Why are they necessary for soundness?

4.15 The justification for the proposed Modification to Policy SBA2 to provide a replacement city centre police base which is recommended to the Inspectors’ is set out in the Police’s response to Question 6. The inclusion of *“policing provision”* as an existing use within the supporting text of the Plan at paragraph 16.16 which has been agreed as a Main Modification in the SoCG is necessary to be factually accurate and agreed. Furthermore, the proposed Modification requiring uninterrupted *“continuity of provision”* is essential for the Police and is fully justified by the NPPF, the Council’s own Local Plan policies which support the need to maintain safety, security and discourage ASB, as well as to fulfil their Section 17 duty. As such, all of the agreed and proposed Modifications to Policy SBA2 are necessary for soundness.

4.16 The NPPF at paragraph 101 anticipates engagement between the Police and local planning authorities in the preparation of Local Plans. The Police advising ECC of the need to re-provide the city centre Police base as a result of the developments within Exeter is evidence of the engagement that the NPPF encourages which should inform the approach to local policy.

4.17 Without all of the Modifications, the Plan will not provide for an appropriate strategy and as such will fail to deliver the objectives of creating safe and accessible places, where crime and disorder, and the fear of crime, do not undermine the quality of life, as required by paragraph 96 b) of the Framework.

4.18 The Police would therefore ask the Inspectors’ to recommend the following Main Modification to Policy SBA2:

Modification to Policy SBA2:

*“C. Social, community and cultural infrastructure including:
vi. Accommodation appropriate for a city centre police base including office and public enquiry space to provide appropriate continuity of provision.”*

4.19 In addition to this, the reference to *“policing provision”* within paragraph 16.16 of the East Gate supporting text in the Plan which has been agreed in the SoCG as a Modification should be retained.

4.20 All of the above Modifications are necessary to make the plan sound, so it is consistent with national policy as set out above, and the Section 17 Duty as required by paragraph 36d), and only if a replacement city centre Police base is provided, will it be an appropriate strategy under paragraph 36b).

5.0 CONCLUSION

5.1 The Police continue to consider that without this Modification, the current form of the draft Local Plan fails to provide for the necessary police infrastructure to meet national planning policy and the objectives of the Plan itself.

- 5.2 The Police recommend to the Inspectors' that Policy SBA2 is modified to reflect the Modification set out above in **paragraph 4.18** to support the replacement of the city centre Police base, much of which has already been agreed by ECC in the SoCG at **Appendix M9-DCP2** or suggested (**Appendix M9-DCP1**), and proposed by the Police (**Appendix M9-DCP3**), and in that way, it will be sound.