

Exeter Plan

Schedule of suggested potential modifications:

Major and additional/minor

For submission

September 2025

Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN



1.0 Introduction

- 1.1. The Exeter Plan: Publication Plan – Regulation 19 is submitted to the Planning Inspectorate as the basis for Examination.
- 1.2. As per the Procedure Guide for Local Plan Examinations¹, and as mentioned in the Exeter Plan Advisory meeting with the Planning Inspectorate in March 2025, a Local Planning Authority (LPA) may submit to the Examination a list of suggested modifications to the published plan. This document compiles these potential revisions.
- 1.3. These are not proposed modifications from the Planning Inspectorate but show where revisions could potentially be made. These potential suggested modifications do not change the Regulation 19 version of the Plan which remains as the Submission Plan. On this basis they have not yet been subject to consultation nor Sustainability Appraisal. However, the Inspector (s) may consider it appropriate for some or all of the suggested changes to be discussed at the hearing sessions, and in appropriate circumstances they may form the basis for main modifications. In those cases, consultation and Sustainability Appraisal would take place in future after the Examination Hearings.
- 1.4. The schedules of suggested modifications include both suggested main modifications and suggested additional (minor) modifications for consideration. The suggested main modifications would alter the policy text. The suggested additional minor modifications would affect amend the supporting text They have been derived from a review of representations to the Publication Regulation 19 version of the Exeter Plan and discussions with various representors which have taken place following the Publication.
- 1.5. Potential revisions to the Regulation 19 Policies Map are included in a separate document: Schedule of suggested potential modifications: Policies map

¹ Available at: [Procedure Guide for Local Plan Examinations - GOV.UK](#)

2.0 Schedule of suggested modifications: Suggested main modifications

- 2.1. As per the Procedure Guide for Local Plan Examinations, main modifications are those which are required to make the Plan sound or legally compliant.
- 2.2. The City Council requests that the appointed Inspector recommends main modifications as may be required to make the Plan sound. This could include consideration of the suggested modifications included in the schedule. The contents of the main modifications schedule are presented in Plan order and are those which would see an update to the policies themselves as opposed to the supporting text.

Suggested Main Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
1. Explaining the Exeter Plan				
SMM1	1.8: Plan period	Plan period of 2021 – 2041.	Plan period of 2022 – 2042	To ensure that, when the Exeter Plan is adopted, there will still be 15 years of the Plan period remaining. Relevant representation: South West Housing Association Planning Consortium.
2. Exeter: Ancient city – ambitious future				
No suggested main modifications.				
3. This is our city, this is our future				
No suggested main modifications.				
4. Spatial strategy				
SMM2	S2: Liveable Exeter principles	It is not clear that the policy applies to comprehensive regeneration proposals including at the North Gate and Marsh	Amend the introductory text of the policy to read:	To ensure it is clear the policy applies to the regeneration opportunity areas.

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		Barton regeneration areas.	'The delivery of high-quality large scale residential and commercial development at the strategic, mixed use brownfield developments allocations and the regeneration opportunity areas of North Gate and Marsh Barton and elsewhere in the case of comprehensive regeneration, will be supported in accordance with the requirements of the Liveable Exeter Principles'.	Relevant representation: Historic England
5. Climate change				
SMM3	CC3: Local energy networks	The policy states where new local energy networks are proposed but does not specifically state that proposals for these local networks will be supported.	Amend policy to read: Local energy networks area proposed in the following locations Proposals for local energy networks in the following locations will be supported...	To ensure it is clear that proposals for new energy networks will be supported. Relevant representation: 1 Energy (Exeter Energy Limited)
SMM4	CC4: Ground-mounted photovoltaic arrays	Policy (criteria e) refers to the setting of heritage assets but not to the heritage assets themselves.	Amend policy (criteria e) to read: e. Protect <u>heritage assets and their settings</u> of heritage assets;	To ensure it is clear that heritage assets and their settings need to be protected. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England

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SMM5	CC5: Future development standards	Text refers to policy coming into force in 2025, but the Exeter Plan will not be adopted until 2027.	Amend policy to remove reference to 2025 to read: 'From 2025, residential development will be is...'	To avoid any confusion as the Exeter Plan will not be adopted before 2026. Relevant representation: Taylor Wimpey
SMM6	CC8: Flood risk	Text refers to the requirements for development to meet the sequential test and the exception test but does not indicate that any development is exempted.	Amend policy text to read: 'In all areas at risk of flooding from any source, development proposals will only be permitted where it is demonstrated that the proposal satisfies the sequential test and, where necessary, the exception test (unless exempted by national standing advice).'	To ensure it is clear that there are occasions where development is exempted from these requirements by national standing advice. Relevant representation: Exeter Civic Society
SMM7	CC8: Flood risk	Policy requires all development to follow the drainage hierarchy but makes no reference to natural flood management techniques.	Amend policy to read: '...drainage hierarchy, making as much use as possible of natural flood management techniques, and by utilising...'	To add reference to natural flood management techniques in accordance with the 2023 NPPF. Relevant representation: Exeter Green Party
6. Homes				
SMM8	H1: Housing requirement	Policy refers to a twenty-year plan period of 2021 to 2041, rather than 2022 to 2042 (see SMM1) and therefore does not provide for a minimum of fifteen years from adoption.	Amend policy to read: 'The City Council will target the delivery of at least 642 homes per year between 2021 2022 and 2041 2042. To meet this target and allow for choice and competition in the	To ensure the Plan covers a minimum fifteen-year period from adoption, as required by paragraph 22 of the 2023 NPPF. Relevant representation: South West Housing Association

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		Also, policy refers to the housing supply position at the time of Plan Publication, and not to the position at the time of Plan Submission.	market, delivery of 13,975 14,119 homes is proposed from the following sources: - A total of 2,311 1,939 completions in 2021/22, 2022/23, and 2023/24 and 2024/25; - Approximately 5,289 5,416 homes from existing planning consents; - Approximately 5,389 4,766 homes on site allocations; and - Approximately 1,006 1,998 homes on windfall sites.'	Planning Consortium. Also, to ensure the Plan reflects the housing supply position at the time of Plan Submission, including with reference to 2021 Census data and PPG guidance on counting completions.
SMM9	H2: Housing allocations and windfalls	The policy gives a housing capacity for each site but does not clarify if the capacity is approximate/absolute or a minimum or maximum figure.	Amend policy (heading of third column) to read: 'Approx. nNumber of homes.'	To clarify that site capacities are the approximate number of homes expected to be delivered, rather than an absolute, minimum or maximum requirement. Relevant representation: Nixon Homes Limited and Telereal Scrutinised Property GP Limited.
SMM10	H2: Housing allocations and windfalls	Site capacity for Water Lane is taken from the assessment of site ref. 15 in the 2024 Exeter Housing and Economic Land Availability Assessment – Third Edition (HELAA). It does not	Amend policy to read: 'Water Lane 15 1,861 1,652'	To ensure Water Lane's capacity reflects total homes proposed by planning application 23/1007/OUT, and the number of homes the City Council expects to be

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		fully reflect the no. of homes proposed by planning application 23/1007/OUT for Water Lane South, granted resolution to approve planning consent in December 2024. Also, it does not reflect a revised assessment of potential build rates at the site.		delivered at Water Lane over the twenty-year Plan period.
SMM11	H2: Housing allocations and windfalls	Site capacity for East Gate is taken from the assessment of site ref. 145 in the 2024 Exeter HELAA – Third Edition. It does not reflect the no. of homes proposed by planning application 25/1082/FUL (Clarendon House), made in August 2025.	Amend policy to read: 'East Gate 145 609 691'	To ensure East Gate's capacity reflects total homes proposed by planning application 25/1082/FUL for Clarendon House.
SMM12	H2: Housing allocations and windfalls	Site capacity for Red Cow is taken from the assessment of site ref. 146 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of land availability, contained in the 2025 HELAA – Fourth Edition.	Amend policy to read: 'Red Cow 146 442 393'	To ensure Red Cow's capacity reflects the revised assessment of land available for development contained in the 2025 Exeter HELAA – Fourth Edition.
SMM13	H2: Housing allocations and windfalls	The site reference number of South Gate is stated as 46; however, this relates to a larger site assessed in the 2024 Exeter	Amend policy to read: 'South Gate 46 169 81'	To ensure South Gate's site reference is the same as the

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		HELAA – Fourth Edition. The 2025 Exeter HELAA – Fourth Edition contains a site assessment for the South Gate allocation, with the site reference 169.		2025 Exeter HELAA – Fourth Edition.
SMM14	H2: Housing allocations and windfalls	Site capacity for Heavitree Road Police Station is taken from the assessment of site ref. 104 in the 2024 Exeter HELAA– Third Edition (HELAA). It does not reflect the no. of homes proposed by planning application 25/0676/FUL made in June 2025.	Amend policy to read: 'Heavitree Road Police Station 104 350 813'	To ensure Heavitree Road Police Station's capacity reflects total homes proposed by planning application 25/0676/FUL. Relevant representation: Nixon Homes Limited.
SMM15	H2: Housing allocations and windfalls	Site capacity for Mary Arches Multi-Storey and Surface Car Park is taken from the assessment of site ref. 153 in the 2024 Exeter HELAA – Third Edition (HELAA). It does not reflect PPG guidance that studio flats can be counted as one dwelling.	Amend policy to read: 'Mary Arches Multi-Storey and Surface Car Park 163 154 246'	To ensure Mary Arches Multi-Storey and Surface Car Park's capacity reflects PPG guidance on how to count studio flats. Relevant representation: Nixon Homes Limited.
SMM16	H2: Housing allocations and windfalls	Site capacity for Whipton Community Hospital is taken from the assessment of site ref. 64 in the 2024 Exeter HELAA – Third Edition (HELAA). It does not reflect a revised assessment	Amend policy to read: 'Whipton Community Hospital 64 110 129'	To ensure Whipton Community Hospital's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition,

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		of the site's capacity contained in the 2025 HELAA – Fourth Edition.		informed by development management advice.
SMM17	H2: Housing allocations and windfalls	Site capacity for Land at Newcourt Road, Topsham is taken from the assessment of site ref. 91 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of the site's capacity contained in the 2025 HELAA – Fourth Edition.	Amend policy to read: 'Land at Newcourt Road, Topsham 91 69 51'	To ensure Land at Newcourt Road's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition, informed by development management advice.
SMM18	H2: Housing allocations and windfalls	Site capacity for Land adjoining Silverlands is taken from the assessment of site ref. 18 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of the site's capacity contained in the 2025 HELAA – Fourth Edition.	Amend policy to read: 'Land adjoining Silverlands 18 67 55'	To ensure Land adjoining Silverland's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition, informed by development management and developer advice.

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SMM19	H2: Housing allocations and windfalls	Site capacity for Land to the east of Newcourt Road 2, Topsham is taken from the assessment of site ref. 104 in the 2024 Exeter HELAA – Third Edition. It does not reflect the no. of homes proposed by planning application 24/1425/FUL made in January 2025.	Amend policy to read: 'Land to the east of Newcourt Road 2, Topsham 153 45 27'	To ensure Land to the east of Newcourt Road 2, Topsham's capacity reflects total homes proposed by planning application 24/1425/FUL.
SMM20	H2: Housing allocations and windfalls	Belle Isle Depot, Belle Isle Drive is included as a site allocation, but the allocation does not reflect additional work by the Environment Agency during 2025.	Amend policy to read: 'Belle Isle Depot, Belle Isle Drive 72 40'	To ensure Policy H2 reflects additional work by the Environment Agency during 2025, which concludes that the site is not a suitable housing allocation. The Environment Agency supports the suggested text change (see EA Statement of Common Ground). Relevant representation: Environment Agency.
SMM21	H2: Housing allocations and windfalls	Site capacity for Gipsy Hill Hotel is taken from the assessment of site ref. 65 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of the site's capacity contained	Amend policy to read: ' Gypsy Gipsy Hill Hotel 165 28 41'.	To ensure Gipsy Hill Hotel's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition, informed by

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		in the 2025 HELAA – Fourth Edition. Also, the site name is spelled incorrectly.		development management advice. Also, to correct a spelling error.
SMM22	H2: Housing allocations and windfalls	Site capacity for East of Pinn Lane is taken from the assessment of site ref 106 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of the site's capacity contained in the 2025 HELAA – Fourth Edition.	Amend policy to read: 'East of Pinn Lane 106 24 12'	To ensure East of Pinn Lane's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition, informed by development management advice.
SMM23	H2: Housing allocations and windfalls	Site capacity for Land at Matford Lane 2 is taken from the assessment of site ref 158 in the 2024 Exeter HELAA – Third Edition. It does not reflect a revised assessment of the site's capacity contained in the 2025 HELAA – Fourth Edition. Also, the site name is incorrect.	Amend policy to read: 'Land at Matford Lane 2 158 21 27'	To ensure Land at Matford Lane's capacity reflects the revised site assessment contained in the 2025 Exeter HELAA – Fourth Edition, informed by development management advice. Also to correct the site name.
SMM24	H2: Housing allocations and windfalls	Site capacity for Hessary, Hollow Lane is taken from the assessment of site ref. 108 in the 2024 Exeter HELAA – Third Edition. It does not reflect new	Amend policy to read: 'Hessary, Hollow Lane 108 17 18'	To ensure the site's capacity reflects the revised assessment of land available for development contained in

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		evidence of land availability and a subsequently revised assessment of land availability, which has increased the site's capacity.		the 2025 Exeter HELAA – Fourth Edition.
SMM25	H2: Housing allocations and windfalls	The site name of Land south of Gypsy Hill Lane is spelled incorrectly.	Amend policy to read: 'Land south of Gypsy Gipsy Hill Lane'.	To correct a spelling error.
SMM26	H2: Housing allocations and windfalls	Land at Hamlin Lane is included as a site allocation, but the allocation does not reflect additional work undertaken by the City Council during 2025 on site suitability.	Amend policy to read: ' Land at Hamlin Lane 60 13 '	To ensure Policy H2 reflects additional work undertaken by City Council during 2025, which concludes that the site is not a suitable housing allocation.
SMM27	H2: Housing allocations and windfalls	88 Honiton Road is included as a site allocation but this does not reflect evidence of land availability provided by the landowner in January 2025.	Amend policy to read: ' 88 Honiton Road 110 10 '	To reflect latest evidence from the landowner, who has advised that the site is no longer available for housing development. Relevant representation: Murleigh Retail.
SMM28	H3: Regeneration opportunity areas	The policy refers generically to 'development proposals', but does not make it clear that it only applies to comprehensive regeneration proposals. It would also be helpful for the policy to identify particular	Amend policy H3 to read: ' Comprehensive regeneration development proposals for residential and a wider mix of uses...' Criteria unchanged. Then:	To clarify that the policy relates to development proposals for comprehensive regeneration, rather than development of brownfield land more generally.

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		material considerations at North Gate and Marsh Barton.	'Opportunities for comprehensive regeneration may occur anywhere within the urban boundary. However, specific potential is identified in the Marsh Barton and North Gate Regeneration Opportunity Areas. The full range of planning policies in the Exeter Plan will apply to proposals for comprehensive regeneration. In the case of North Gate, heritage will be a critical consideration. In the case of Marsh Barton, flood risk will be a critical consideration.	Also, to identify the key issues associated with development at North Gate and Marsh Barton. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England. NB: Historic England's representation particularly relates to North Gate.
SMM29	H4: Affordable housing	The small spacing between the text setting out the required brownfield land tenure split and criterion a implies that criteria a to h only apply to brownfield development.	Amend policy to read: 'Affordable housing tenure split: social rent: 50%; affordable home ownership: 50% a. Where it is not viable to provide...'	To clarify that the criteria a to h apply to both greenfield and brownfield sites. Relevant representation: Exeter Civic Society.
SMM30	H4: Affordable housing	Criterion b states that at least 30% of First Homes delivered to meet the policy's affordable home ownership requirement should be sold at a discount from market prices of at least 50% This does not accord with the findings of the 2024 Exeter	Amend policy to read: b. To meet local needs, at least 30% of any First Homes delivered to meet the affordable home ownership requirement should be sold at a discount from market prices of at least 50% 40%;	To ensure the policy reflects the evidence of need for First Homes in the 2024 Exeter Local Housing Needs Assessment.

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		Local Housing Needs Assessment (figure 51).		
SMM31	H5: Build to rent housing	The introductory sentence to the second part of the policy contains a spelling mistake.	Amend policy to read: 'On build to rent developments of ten or more homes or with a site area of 0.5 hectares of or more, affordable housing in the form of affordable private rent must be provided as follows:'.	To correct a spelling mistake.
SMM32	H6: Co-living housing	Criterion b of the policy states that private ensuite bedrooms/studios should not be a self-contained home or capable of being used as such. Criterion b could also do more to ensure high quality.	Amend policy to read: 'b. Provide each resident with a private ensuite bedroom or studio that affords adequate functional living space and with a well-designed layout, and is not a self-contained home or capable of being used as a self-contained home whilst promoting communal living.'	It is not feasible to enforce against a co-living unit being used as a self-contained home. Also, to ensure co-living housing has a focus on high quality communal living.
SMM33	H6: Co-living housing	Criterion c of the policy lists "A kitchen" as one of the minimum communal spaces and facilities that should be provided. However, co-living developments will require more than one kitchen to serve all residents and that kitchen must be well-equipped in order to promote communal living.	Amend the first bullet point of criterion c of the policy to read: ' A-k Kitchens fully equipped for food preparation and cooking.'	To clarify that co-living developments should have more than one kitchen and to ensure that residents have access to good quality kitchens. Relevant representation: Cllr Anne Jobson.
SMM34	H7: Custom and self-build housing	Criterion b of the first part of the policy states that custom and	Amend policy to read:	To clarify that all development proposals for twenty or more

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		self-build housing will be supported on windfall sites within the urban boundary if desired by the landowner. This wrongly suggests that criterion a of the first part does not apply to windfall sites. Also it does not make it clear that the percentage policy is a requirement.	'Custom and self-build housing will be supported: required a. On development proposals of twenty or more homes, where 5% of homes should be made available as serviced plots for sale to custom or self-builders; and b. On windfall sites within the urban boundary if desired by the landowner.'	homes are required to include 5% serviced plots for custom or self-build homes, including windfall development.
SMM35	H7: Custom and self-build housing	The policy states that custom and self-build housing development will be required to deliver affordable housing in accordance with policy H4, but this could be read to mean that policy H4 only applies to developments of 100% custom and self-build housing.	Amend policy to read: ' Development that includes c Custom and self-build housing developments will be required to deliver affordable housing in accordance with Policy H4.	To clarify that policy H4 applies to all developments that include custom and self-build housing.
SMM36	H7: Custom and self-build housing	The policy's states that plots for custom and self-build 'will' have certain provisions (criteria a to d). It should made be clear that these provisions are required.	Amend policy to read: 'Plots for custom and self-build will must be provided as follows:'	To clarify that criteria a to d of the policy are requirements.
SMM37	H9: Supported housing	Criterion f requires that proposals for supported housing do not result in unacceptable harm to the amenity of neighbouring residents. However, matters of residential amenity are covered separately	Amend policy by deleting existing criterion f, to read: ' f. Do not result in unacceptable harm to the amenity of neighbouring residents; and'.	To avoid repetition, because matters of residential amenity are covered by Policy H16. Relevant representation: Exeter Green Party.

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		by policy H16: Residential amenity and healthy homes.		
SMM38	H9: Supported housing	The policy omits to require that development is supported by a Management Plan, to help ensure good quality housing. This contrasts with policies H6: Co-living housing and H10: Purpose built student accommodation, which require a Management Plan.	Amend criterion f of the policy to read: 'f. Do not result in unacceptable harm to the amenity of neighbouring residents Are professionally managed in accordance with a Management Plan; and'	To ensure that supported housing is well managed and thereby of good quality, and to ensure consistency with policies H6 and H10. Relevant representation: Exeter Green Party.
SMM39	H10: Purpose built student accommodation	Criterion b of the policy could do more to ensure high quality housing.	Amend policy to read: 'b. Provide residents with high quality housing comprising a private bedroom in a cluster flat or studio that affords adequate functional living space and with a well-designed layout, within a wider development that includes sufficient communal facilities, services and external amenity space to meet student needs;'	To ensure cluster flats and studios are of high quality in terms of both functionality and design.
SMM40	H10: Purpose built student accommodation	Criterion c does not make it clear that purpose built student accommodation developments must include provision of blue badge car parking.	Amend policy to read: 'c. "Are accompanied by a Transport Statement/Transport Assessment and Travel Plan and include no private car parking other than for blue badge holders only;'	To clarify that purpose built student accommodation must include blue badge holder car parking. Relevant representation: University of Exeter Students' Guild.

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SMM41	H11: Gypsy and Traveller accommodation	Criterion d requires that proposals for Gypsy and Traveller accommodation do not result in unacceptable harm to the amenity of neighbouring residents. However, matters of residential amenity are covered separately by policy H16: Residential amenity and healthy homes.	Amend policy by deleting criterion d, to read: 'd. There is no unacceptable harm to the amenity of neighbouring residents; and'.	To avoid repetition, because matters of residential amenity are covered by Policy H16. Relevant representation: Exeter Green Party.
SMM42	H11: Gypsy and Traveller accommodation	The policy omits to require that development is supported by a Management Plan, to help ensure good quality housing. This contrasts with policies H6: Co-living housing and H10: Purpose build student accommodation, which require a Management Plan.	Amend policy by replacing existing criterion d, to read: 'd. Do not result in unacceptable harm to the amenity of neighbouring residents Are professionally managed in accordance with a Management Plan; and'	To ensure that multi-plot/pitch sites for Gypsies and Travellers are well managed and thereby of good quality, and to ensure consistency with policies H6 and H10. Relevant representation: Exeter Green Party.
SMM43	H11: Gypsy and Traveller accommodation	Criterion e states that sites for Gypsy and Traveller accommodation will be supported where they are located within the urban boundary. However, development outside the urban boundary may be appropriate in some circumstances.	Amend policy to read: 'e. The site is within the urban boundary and the proposal does not cause an unacceptable landscape or ecological impact and is not in an area at high risk of flooding;'	To enable Gypsy and Traveller sites to be developed outside the urban boundary subject to consideration of other relevant Plan policies. Relevant representation: TravellerSpace.
SMM44	H11: Gypsy and Traveller accommodation	Criterion f requires that occupation of Gypsy and Traveller pitches or plots is	Amend policy to read: 'f. "Occupation is limited to	To reflect changes to the Government's published definition of Gypsies and

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		limited to households meeting the Government's published definition of Gypsies and Travellers or Travelling Showpeople, or who are cultural Gypsies and Travellers or Travelling Showpeople.	households that meet the Government's published definition of Gypsies and Travellers or Travelling Showpeople, or who are cultural Gypsies and Travellers or Travelling Showpeople; and .	Travellers and Travelling Showpeople contained in the 2024 Planning Policy for Traveller Sites, which render reference to cultural Gypsies and Travellers and Travelling Showpeople unnecessary.
SMM45	H11: Gypsy and Traveller accommodation	The policy at criterion g contains a spelling error.	Amend policy to read: 'g. In the case of permanent accommodation, it delivers affordable housing in accordance with Policy H4.'	To correct a spelling error.
SMM46	H12: Residential conversions and houses in multiple occupation	Criterion c of the policy could do more to ensure high quality housing.	Amend policy to read: 'c. Provide high quality housing that includes sufficient external amenity space and functional, well-designed internal layout and living space to meet the residents' needs, including compliance with nationally described spaces standards (where relevant);'	To ensure residential conversions and HMOs are of high quality in terms of functionality and design.
SMM47	H14: Accessible homes	Policy sets accessible housing requirements for affordable and market homes. It would benefit from amendments to improve clarity. Also, the 2024 Local Housing Needs Assessment supports a requirement for M4(3) to be met in <u>at least</u> 10% of affordable	Amend policy to read: 'Development proposals for A new homes (created via works to which Part M Volume 1 of the Building Regulations applies) will be supported when: a. The market homes are built to meet accessible and adaptable standards (Building Regulations	To improve clarity and ensure consistency with the findings of the 2024 Exeter Local Housing Needs Assessment. Relevant representations: Various

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		homes, as opposed to a maximum of 10%.	M4(2)) At least 10% of the affordable homes are built to meet wheelchair user standards (Building Regulations M4(3)); and b. 10% of the affordable homes are built to meet wheelchair user standards (Building Regulations M4(3)), with the remainder built to meet accessible and adaptable standards (Building Regulations M4(2)) All other homes are built to meet accessible and adaptable standards (Building Regulations M4(2)).	
SMM48	H15: Housing density and size mix	The policy currently requires consideration of local context in terms of considering housing density and size mix but does not provide further detail about what these considerations would include.	Include additional text to the policy so it reads: 'b. Local context, including the natural, built and historic environment including settings and views'.	To ensure that a range of elements of the local context are considered when determining appropriate development density. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England
SMM49	H15: Housing density and size mix	Criterion c of the policy implies that the tenure mix of a proposed development should be considered when seeking to optimise density and deliver a	Amend policy to read: 'Development proposals for new homes will optimise density and	To ensure that density and size mix are considered with reference to appropriate external factors.

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		mix of house sizes. This is not the case.	incorporate a mix of housing sizes, taking into account: a. Local need, as evidenced by the City Council's latest Local Housing Needs Assessment; b. Local context; and c. The proposed tenure mix of the development; and d. The mix of housing sizes in the locality.'	
SMM50	H15: Housing density and size mix	The Plan should enable the impact that proposed housing type will have on the character of an area to be considered. Other than in policy H12 (Residential conversions and houses in multiple occupation), the Plan currently does not allow for this.	Amend policy to read: H15: Housing density, and size and type mix 'Development proposals for... d. The mix of housing sizes in the locality. Development proposals for new homes will be supported where they will not create an over-concentration of a housing type which would harm the character of a locality.'	To enable over-concentrations of a housing type that would harm the character of a locality to be avoided. Relevant representations: Various
7. Economy and jobs				
SMM51	EJ1: Economic growth	Policy supports development that meets the economic development needs of the city but does not clearly set out the overarching approach to supporting growth and does not	Amend policy to read: 'Development proposals will be supported where they meet the economic needs of the city as identified in the Economic	To clearly set out the overarching approach to delivering growth, and to indicate the number of jobs this will deliver.

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		include a jobs growth target.	Development Needs Assessment. The established employment areas will be protected, new forms of employment provision delivered, and new sites allocated for employment use. This will deliver in excess of 14,900 jobs within Exeter over the Plan period.'	Relevant representations: Various
SMM52	EJ1: Economic growth	Policy supports Exeter in becoming one of the UK's leading knowledge, innovation and clean growth economies, but has a particular focus on the transformational sectors and lists these within the policy text.	Amend policy text to read: '...The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge, innovation and clean growth economies. appropriate development proposals for the following transformational sectors will be supported.: •Data analytics; •Environmental futures; •Health innovation; •Digital innovation; •Green economy; •Creative industries; and •Other emerging transformational sectors. To help achieve deliver this, appropriate development proposals in the priority sectors identified in the UK's Modern Industrial Strategy and the transformational sectors will be supported, and the City Council will	To ensure a 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). Relevant representations: Various

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			work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training, to encourage and support growth transformational sectors.	
SMM53	EJ2: Retention of employment land	Policy states that employment land should be retained and sets out under what circumstances changes of use may be allowed but the layout of the policy does not allow easy comprehension.	Amend policy layout to read: ‘...Elsewhere, the loss of employment land to an alternative use may be considered acceptable where: a. the site is allocated for mixed use redevelopment, or; b. where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace, or; c. where it is demonstrated that employment use is no longer viable and there is no reasonable prospect of the site being used for employment purposes in the future.’	To aid interpretation of policy. Relevant representations: Chex Developments; Costco Wholesale UK
SMM54	EJ3: New forms of employment provision	Policy supports new forms of employment provision but is unduly prescriptive.	Amend policy to read: ‘To promote economic growth, reduce the need to travel, deliver high quality development and support flexible working, development proposals for the following new forms	To avoid being unduly prescriptive and to ensure the policy allows for the provision of other new forms of employment provision. Relevant representation:

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			of employment development will be supported, including: • Work hubs; • Collaborative workspace; and • Appropriate live-work schemes. Strategic mixed-use brownfield development proposals will be required to include these new forms of employment provision unless it has been demonstrated robustly that the demand has been addressed in other ways.'	Costco Wholesale UK
SMM55	EJ6: New transformational employment allocations	Policy allocates new sites for employment development but restricts these to transformational uses.	Amend policy title to read: 'New transformational employment allocations' and amend policy text to read: 'The following sites are allocated for transformational employment development and associated infrastructure that helps to meet the economic needs of the city as identified in the Economic Development Needs Assessment and will be retained for this purpose.	To ensure flexibility in meeting the employment needs of the city as identified in the EDNA and to remove the restriction that sites should be for transformational uses. Relevant representations: Various
8. Retail and the future of our centres				
SMM56	Policy RFC2: Development in, and affecting, our centres	Policy limits the amount of retail which is appropriate at the strategic brownfield allocations, including East Gate (SBA2) and Exe Bridges Retail Park (SBA4).	Amend policy to read: 'Development proposals for convenience retail provision of up to 500 square metres of net sales area	To ensure the policy supports the existing retail function of East Gate and Exe Bridges Retail Park.

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		This is inappropriate because of current significant levels of retail on these sites, which would continue to be an appropriate use in future.	will be supported as part of a wider mix of uses in the strategic mixed use brownfield allocations where it is demonstrated that the proposals will minimise the need to travel and provide access in accordance with the transport hierarchy. Larger scale and comparison retail are unlikely to be acceptable within the strategic mixed use brownfield allocations with the exception of East Gate and Exe Bridges Retail Park.'	Relevant representation: NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd
9. Sustainable transport and communications				
SMM57	STC1: Sustainable movement	The policy provides the overarching approach to promoting sustainable travel. However, it does not make reference to some key transport policy and strategy documents.	Amend policy to include additional text at the end: 'Contributions towards mitigation will be sought as appropriate in accordance with the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study'.	To ensure that contributions for development mitigation can be sought for a variety of interventions identified in relevant transport policy documents, strategies and studies. National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
SMM58	STC2: The transport hierarchy	The policy provides the overarching approach to promoting sustainable travel and	Amend final paragraph of the policy to read:	To clarify that development could provide contributions or directly deliver transport

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		explains that contributions could be made towards transport provision. The text does not currently refer to the potential for direct delivery of transport measures nor appropriately explain the potential phasing of new provision.	'The direct delivery of, or € contributions towards, additional or improved transport provision will be sought where necessary from the early phases of development and onwards'.	provision from the early phases of development and throughout future phases. Relevant representation: For consistency with a representation on Policy STC3 from Emma Townsend (see SMM60).
SMM59	STC3: Supporting active travel	The second criterion d of the policy prescribes parking and storage requirements for major developments. However, not all of these will be relevant in all cases.	Amend the policy to read: 'Major development proposals must:...	To ensure that active travel requirements are appropriate to the types of major development which could come forward. Relevant representation: Chex Developments Limited C/O Zinc RE UK Limited
SMM60	STC3: Supporting active travel	Currently, the policy does not refer to the potential for direct delivery of active travel measures nor appropriately explain the potential phasing of new provision.	Amend the final paragraph of the policy to read: 'The direct delivery of, or contributions will be sought towards, new or improved active travel infrastructure in the city will be sought from the early phases of development and onwards'.	To clarify that development could provide contributions to, or directly deliver, active travel infrastructure from the early phases of development and throughout future phases of development. Relevant representation: Emma Townsend.
SMM61	STC4: Supporting public transport	The policy includes a definition of large scale development	Amend the policy to read:	To avoid repetition and to simplify the reference to

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		proposals, which is unnecessary as a definition is included in the glossary. Also, greater simplicity is required regarding reference to mobility hubs and interchanges.	'Large scale development proposals of one hundred homes or more and major commercial development must: c. 'Provide new local multi-modal transport hubs and interchanges mobility hubs making best use of existing bus, rail and walking and cycling routes'.	mobility hubs and interchanges. Relevant representation: Various
SMM62	STC4: Supporting public transport	Currently, the policy does not refer to the potential for direct delivery of public transport measures.	Amend the final paragraph of the policy to read: 'The direct delivery of, or contributions, will be sought towards new or improved public transport services and/or infrastructure in the city will be sought and appropriately phased to provide high quality travel options early in the development balanced with efficiently supporting the long term future of the service'.	To ensure consistency with the way in which other transport policies are phrased (STC2 and STC3) and to clarify that development could directly deliver public transport related requirements. Relevant representation: For consistency with modification for STC3 (see SMM60).
SMM63	STC5: Supporting more sustainable forms of car use	The policy does not refer to the need to accommodate trips/vehicles related to health and care.	Amend the policy to read: 'Specific provision must be made in major developments for loading, unloading and deliveries together with access and parking for emergency services, medical staff and carers where relevant'.	To ensure that major developments make appropriate provision for various specific parking needs. Relevant representation: Exeter Conservatives
SMM64	STC6: Travel Plans	The policy currently states that travel plans will be needed in	Amend the first paragraph of the policy to read:	To ensure clarity over when travel plans are required.

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		relation to transport impacts as opposed to amounts of movement.	'All development proposals which generate significant amounts of movement transport impacts should be accompanied by a Travel Plan'.	National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
SMM65	STC6: Travel Plans	The policy refers to the monitoring of travel plans but currently does not refer to monitoring and review.	Amend the final paragraph of the policy to read: 'Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions. The outcomes of the travel plan measures will be monitored and reviewed, with the measures updated and actioned as appropriate.	To ensure that monitoring is effective in achieving travel plan objectives. National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
SMM66	STC7: Safeguarding transport infrastructure	The policy does not refer to the need for widening along the A377 on the approach to Alphington.	Amend the policy to include an additional bullet point to read: i). Land for the widening of the A377 between Ide roundabout on the A30 and the junction of Alphington Road and Church Road'.	To ensure appropriate land is safeguarded to enable highway measures to be delivered to mitigate strategic development impacts. National Highways supports the suggested modification (see National Highways Statement of Common Ground).

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				Relevant representation: National Highways.
10. Natural environment				
SMM67	NE2: Valley Parks	Policy references the Riverside and Ludwell Valley Parks Masterplan but makes a rigid requirement that proposals must accord with this document and uses terminology which is unclear.	Amend policy to read: 'Development proposals which are contrary to must , where relevant, have reference to the Riverside and Ludwell Valley Parks Masterplan. Proposals which would harm existing or potential opportunities for the key purposes for which the Valley Parks are designated above functions will not be permitted'	To ensure that policy requirements are clear but not unduly onerous or rigid. Relevant representation: 1 Energy (Exeter Energy Limited)
SMM68	NE4: Green Infrastructure	Policy requires development to protect existing GI and take opportunities to deliver new GI, but does not refer to making improvements to existing GI.	Amend policy to read: 'All development proposals will be required to protect existing, and take opportunities to improve existing , or deliver new, green infrastructure...'	To ensure it is clear that improvements to existing GI may be required. Relevant representation: Devon Countryside and Access Forum
SMM69	NE6: Urban Greening Factor	Policy text does not conform with Natural England guidance, which suggests the 'will target' terminology.	Amend policy text to read: '...development will achieve target a UGF score of at least...'	To conform with the terminology used in Natural England's guidance on the urban greening factor. Relevant representation: Chex Developments
11. History and heritage				

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SMM70	HH1: Conserving and enhancing heritage assets	A series of issues have been raised by Historic England in their Regulation 19 representation, including: • The need for clearer protection of non-designated assets. • The need for clearer reference for development to be informed by the Exeter Skyline Study. • The need to consider heritage at risk. • A small number of other areas of clarification.	See Appendix A.	To address a number of Historic England representations in a comprehensive and clear manner. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England
SMM71	HH2: Conservation Areas	Policy is not consistent with legislation (Planning: (Listed Buildings and Conservation Areas) Act 1990 s72) and national policy. More appropriate reference to the Conservation Area Appraisals is required.	Amend Policy HH2: Conservation areas, as follows: ‘Development proposals should will be required to conserve and enhance the distinctive character, appearance, special architectural value and historic significance of Conservation Areas in accordance with the Council’s Conservation Area Appraisals and Management Plans. Development proposals which would result in significant harm to a Conservation Area will only be supported if the public benefits	To conform with legislation and national policy. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England

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			clearly outweigh the harm.'	
SMM72	HH3: Archaeology	Policy wording is currently inflexible regarding development impact on archaeological assets.	Amend Policy HH3 to read: ' Harm Development proposals which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, including or which would cause harm to its setting, should be avoided . Development proposals will be required to preserve, and where practical, improve access to and interpretation of nationally important archaeological remains, in situ'.	Additional flexibility is required regarding potential impacts of development on archaeological assets. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SMM73	HH3: Archaeology	Policy does not currently clearly explain the supporting evidence required to accompany planning applications, regarding archaeological analysis.	Include an additional paragraph at the end of policy HH3 to read: 'All development proposals on sites which include, or have the potential to include, archaeological interest, should be accompanied by a desk-based assessment and, where necessary, a field evaluation'.	To provide greater clarity about accompanying evidence for planning applications. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SMM74	HH4: Heritage assets and climate change. Policy name	The policy name currently refers to the role that heritage assets can play in mitigating and adapting to climate change. It does not however adequately	Revised the policy name to: 'HH4: Heritage assets Historic buildings and climate change'	To better reflect the role that historic buildings can play in mitigating and adapting to climate change.

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		demonstrate the key role which historic buildings can play as a particular type of heritage asset and therefore a change in policy name is appropriate.		Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SMM75	HH4: Heritage assets and climate change	Linked to SMM74, the policy currently covers the role of all heritage assets in adapting to and mitigating climate change. Greater clarity is required by focusing on the particular role of historic buildings.	Amend policy to read: 'Development proposals that contribute to addressing climate change and affect heritage assets historic buildings will only be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset building and its setting. Development proposals that contribute to addressing climate change and affect non-designated heritage assets will be supported where they should avoid demolition and should prioritise repair, retrofit and adaptive reuse of historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change in accordance with appropriate British Standards and Historic England guidance '.	To provide greater clarity by focusing on the role of historic buildings. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SMM76	HH5: Conserving and enhancing Exeter City	Policy does not currently make accurate reference to legislation.	Amend the policy to read:	To make more accurate reference to legislation and

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	Walls	Unscheduled parts of the City Walls should be afforded the same importance as the Scheduled elements.	'The Exeter City Walls play an important role in defining the historic city, and contribute to the social, cultural and economic life of Exeter. the city, and a As a Scheduled Monument covered by the Exeter City Wall Scheduled Monuments and Archaeological Areas Act, the Exeter City Walls are legally protected due to their national historic importance. Development proposals that cause harm or restrict public access, to the Exeter City Walls will not be permitted Development proposals will be required to conserve and enhance the fabric and settings of the Exeter City Walls and to demonstrate, where feasible, that they improve public access, understanding and visibility of the Exeter City Walls. Development proposals should avoid harm to the Exeter City Walls, and should not restrict public access. Contributions to the repair, maintenance, enhancement and interpretation of the Exeter City Walls will be required where appropriate.	ensure appropriate importance is afforded to unscheduled elements of the City Walls. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
12. Culture and tourism				
No suggested main modifications.				

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13. High quality places and design				
SMM77	D1: Design principles	The policy's reference to townscape value needs to be slightly widened.	Amend policy to read: 'e. Respect the historic environment and retain and refurbish existing buildings according to their of high townscape and historic value, enhancing their setting wherever possible'.	To make a more nuanced reference to townscape. Historic England supports the suggested change (see SoCG). Relevant representation: Historic England.
SMM78	D1: Design principles	Policy does not refer to sustainable management of soils.	Add an additional criterion to the policy to read: 'To promote high quality design and placemaking, development proposals will be supported where they: ... n. use soils in a sustainable manner in accordance with the DEFRA guidance '.	To ensure proposals consider sustainable soil management in accordance with DEFRA guidance. Natural England supports the suggested change (see SoCG). Relevant representation: Natural England.
14. Health and wellbeing				
SMM79	HW1: Health and wellbeing	Policy only supports new healthcare facilities that are easily accessible by public transport and linked effectively to walking and cycling routes.	Amend the policy to read: 'Development proposals for new healthcare facilities will be supported, particularly where they are easily accessible by public transport and link effectively to walking and cycling routes.'	To ensure the policy responds appropriately to the need for new healthcare facilities while providing a more balanced and proportionate approach to the consideration of location, noting that policies IF3, STC1 and STC2 also provide protection against

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				unsustainable locations for development. Relevant representation: Exeter Civic Society.
SMM80	HW2: Environmental quality, pollution and contaminated land	Policy includes an error which suggests only developments with unacceptable impacts will be permitted.	Amend policy to read: 'Development proposals will only be permitted where, individually and cumulatively, taking account of proposed mitigation and remediation, there would be no unacceptable impacts on...'	To ensure the policy protects against unacceptable impacts. The Environment Agency supports the suggested text change (see EA SoCG). Relevant representation: Various.
SMM81	HW2: Environmental quality, pollution and contaminated land	The policy requires that, for development proposals on land affected by contaminated or pollution, the land must be "made suitable for the proposed use". This does not use the Environment Agency's accepted 'Suitable for use' terminology (which means suitable for the environment as a whole, not just for use by people).	Amend second criterion 'a' of the policy to read: 'a. The land is or can be made suitable for the proposed use; and'	To add clarity and to align the wording of the policy with the Environment Agency's terminology. The Environment Agency supports the suggested text change (see EA SoCG). Relevant representation: Environment Agency.
15. Infrastructure and facilities				
SMM82	IF2: Viability	The policy limits the circumstances in which deviations from policy requirements on the grounds of viability will be accepted by setting out a list of	Amend policy to read: 'To ensure that development provides the necessary policy requirements, affordable housing and infrastructure to create and maintain	To bring greater clarity by aligning the policy more closely with PPG which states that 'Where up-to-date policies have set out the contributions expected from development,

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		circumstances, at least one of which must have occurred to a significant degree following the adoption of the Plan. Representors have raised concern with this approach and its alignment with national planning policy.	sustainable communities, deviation from policy on the grounds of viability will only be considered appropriate the City Council will only consider deviations from policy requirements on the grounds of viability in instances where the applicant has robustly demonstrated, to the satisfaction of the City Council, that particular circumstances clearly justify the need for a viability assessment at the application stage. These circumstances could include where one or more of the following have occurred to a significant degree following the adoption of the Exeter Plan: ...'	planning applications that fully comply with them should be assumed to be viable', and that 'It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage'. Relevant representation: Various.
SMM83	IF2: Viability	Policy refers to abnormal costs as being a circumstance in which deviation from policy requirements on viability grounds may be considered. However, this is contrary to PPG.	Amend policy to read: 'a. Increases in infrastructure or abnormal development costs which could not reasonably have been foreseen at the time of the Exeter Plan's adoption;'.	To ensure the policy accords with the PPG which is very clear that abnormal costs are not a matter to be considered within viability; it is for the land value to cover this.
SMM84	IF2: Viability	Policy states that, where deviations from policy requirements are accepted on viability grounds, the viability of the development will be reviewed every three years. Representors have raised	Amend policy to read: 'Where policy compliant infrastructure requirements and/or contributions are not provided due to an agreed viability reason, the City Council will, where appropriate,	To provide additional flexibility during the development management process to allow for case-specific details (such as site specific factors and the reason for the viability shortfall) to be accounted for when

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		concerns with an approach of requiring viability review in every instance, and with the trigger for viability review being three years in every instance.	impose mechanisms to allow the viability of the proposal will to be reviewed every three years or in accordance with triggers to be agreed at the application stage, the requirements of this policy to seek to achieve full policy compliance in later development phases'.	determining when to impose mechanisms for viability review and what triggers should be used for the timing of the viability review. Relevant representation: Various.
SMM85	IF3: Community facilities	Policy protects existing community facilities subject to a set of criteria. Representors have raised concern that the criteria are overly broad and open to interpretation, which could make the policy difficult to implement at planning application stage and hinder its effectiveness.	Amend policy to read: 'Existing facilities, including buildings and land, that meet community, social, health, welfare, education, spiritual, cultural, leisure and recreational needs (including Assets Of Community value) will be protected, unless it can be robustly demonstrated that: a. There is no reasonable prospect of the existing use continuing, nor of securing an appropriate alternative community use of the site; or b. An assessment has been undertaken which has clearly shown that there is a proven excess of the existing facility in the area it serves, and there is no reasonable prospect of securing an appropriate alternative community use of the site; or	To bring clarity and to ensure that the policy can be implemented effectively at planning application stage. Relevant representation: Various.

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			a. They are no longer fit for purpose; or b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or c. They are surplus to requirements; or d. There are alternative, appropriate facilities in the area to meet community needs; and e.c. Sufficient alternative or improved provision will be made in a suitable location to serve the local community, which clearly outweighs the loss, and will be provided to a timescale that avoids any significant break in use'.	
SMM86	IF3: Community facilities	Policy supports proposals for new or improved community facilities and states that 'Ongoing engagement in the development process should take place with local communities to ensure that needs are understood, planned for and met'. A representation suggests that proposals will also benefit from engagement with relevant infrastructure organisations.	Amend policy to read: 'Development proposals for new or improved community facilities will be supported. Ongoing engagement in the development process should take place with local communities and relevant infrastructure organisations to ensure that needs are understood, planned for and met.'	To encourage ongoing engagement not only with local communities but also with relevant infrastructure organisations to ensure that proposed community facilities meet needs effectively and make the most of opportunities to provide wider benefits. Relevant representation: Diocese of Exeter.

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SMM87	IF4: Open space, play areas, allotments and sport	Policy protects existing open space, play areas, local green spaces, allotments, playing pitches and sports facilities subject to a set of criteria. Representors have raised concern that the criteria are overly broad and open to interpretation, which could make the policy difficult to implement at planning application stage and hinder its effectiveness.	Amend policy to read: ‘Existing open space, play areas, local green spaces, allotments, playing pitches and sports facilities will be protected unless it can be robustly demonstrated that: a. An assessment has been undertaken which has clearly shown that there is a proven excess of the existing facility in the area it serves, and there is no reasonable prospect of securing an appropriate alternative community use of the site; or a. They are no longer fit for purpose; or b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or c. They are surplus to requirements; or d. There are alternative appropriate facilities in the area to meet community needs; and e.b. Sufficient alternative or improved provision will be made in a suitable location to serve the local community, which clearly outweighs the loss, and will be provided to a	To bring clarity and to ensure that the policy can be implemented effectively at planning application stage. The previous criterion a. (“no longer fit for purpose”) and b. (“no longer viable”) are suggested to be omitted to ensure alignment with the criteria in Paragraph 104 of the NPPF (Dec 2023). Relevant representation: Sport England and various.

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			timescale that avoids any significant break in use'.	
SMM88	IF4: Open space, play areas, allotments and sport	Policy supports proposals for new open space, play areas, local green spaces, allotments, playing pitches and sports facilities where they meet a list of criteria.	Amend policy to read: 'Development proposals for new or improved open space, play areas, local green spaces, allotments, playing pitches and sports facilities will be supported where they are: ...'	To respond to the fact that community needs can be met not only through providing entirely new open space etc., but also through improving existing, and to ensure that the policy supports both. Relevant representation: Devon Countryside Access Forum.
16. Site allocations				
SMM89	Strategic mixed use brownfield allocations: SBA1-SBA5	Policies currently do not include a requirement for development to provide or contribute to appropriate local highway infrastructure improvements.	Amend policies SBA1-SBA5 by including an additional criterion that requires provision of, or contributions to, local highway infrastructure improvements: 'Relevant letter 'bullet point' within the policy will vary: Transport infrastructure to deliver a low-car development: x. Provision of, or contributions to, appropriate local highway infrastructure improvements.'	To ensure local highways infrastructure improvements are secured, to enable redevelopment of the strategic mixed use brownfield allocations. Relevant representation: Exeter Civic Society.
SMM90	Strategic mixed use brownfield allocations: SBA1-SBA5	Policies provide requirements regarding key views but does not cite the appropriate evidence	Amend policies SBA1-SBA5 to read: Relevant letter 'bullet point' within the	To clarify the name and role of the Exeter Skyline Study in terms of informing future

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		base document.	policy will vary: Conservation and enhancement of the historic environment: i. A layout and built form that seeks to conserve and enhance important strategic and local views and is informed by the Exeter Views, Density and Heights Study, Exeter Skyline Study and archaeological and heritage assessment, evaluation and mitigation.'	development proposals Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SMM91	Strategic mixed use brownfield allocations: SBA1-SBA5	Policies require an energy strategy to minimise carbon emissions and incorporate renewal and low carbon energy generation and help deliver local energy networks, but also refer to the need to 'connect to' the local energy network.	Amend policies SBA1-SBA5 to read: Relevant letter 'bullet point' within the policy will vary: 'An energy strategy that minimises carbon emissions (both operational and embodied), incorporates renewable and low carbon energy generation and helps to deliver, and connect to, local energy network	To provide consistency between the strategic mixed use brownfield allocation policies and policy CC3. Relevant representation: Blocwork.
SMM92	Strategic mixed use brownfield allocation: SBA1 - Water Lane	Policy refers to the site's housing capacity correct at the time of Plan Publication. The capacity has since been reassessed, and it is also expected that some homes will be delivered after the end of the Plan period (see also SMM10	Amend policy to read: 'A site of 36.2 hectares at Water Lane is identified for a mixed use development delivering approximately 1,861 2,424 homes	To ensure the policy reflects SMM10 and SAMM17.

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		and SAMM17.	(1,652 during the Exeter Plan period) and...'	
SMM93	Strategic mixed use brownfield allocation: SBA1 - Water Lane	Criterion Cvii specifies requirements for school and family-hub provision at Water Lane, but does not fully reflect the policy requirement agreed between the City and Devon County Councils since Regulation 19 stage.	Amend policy to read: 'vii. A two form entry primary school including early years and communal space for a family hub that shall comply with Department for Education's area guidelines for mainstream schools: Building Bulletin 103, or any successor document in the context of site constraints and proposed higher density development in the area; and viii. eContributions to secondary and special educational needs provision '.	To ensure the requirement for school provision reflects Government guidelines. Devon County Council supports the suggested text change (see Devon County Council SoCG). Relevant representation: Devon County Council.
SMM94	Strategic mixed use brownfield allocation: SBA2 – East Gate	Policy identifies the range of uses which could come forward at the site allocation, but this currently does not include retail or a hotel. Also, policy refers to the site's housing capacity correct at the time of Plan Publication. The capacity has since been reassessed.	Amend policy to read: 'A site of 6.1 hectares at East Gate is identified for a mixed use development delivering approximately 609 691 homes, retail , employment, education/training space, a potential hotel and an impressive and memorable city centre gateway.'	To clarify the potential for ongoing retail use and hotel at East Gate. Also, to reflect updated capacity position (see SMM11).

Suggested Main Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SMM95	Strategic mixed use brownfield allocation: SBA3 – Red Cow	Policy refers to the site's housing capacity correct at the time of Plan Publication. The capacity has since been reassessed.	Amend policy to read: 'A site of 3.8 hectares at Red Cow is identified for a residential led development delivering approximately 442 393 homes, retaining...'	To reflect updated capacity position (see SMM12).
SMM96	Strategic mixed use brownfield allocation: SBA3 – Red Cow	Policy refers to heritage considerations but omits to mention listed buildings in the local area.	Amend criterion H of policy to read: i. A built form that enhances the character and appearance of St David's Conservation Area, conserves and enhances listed buildings and their settings and retains sight lines of locally listed St David's station.'	To ensure that listed buildings in the area are considered by development proposals. Historic England supports the suggested modification (see Historic England Statement of Common Ground). Relevant representation: Historic England
SMM97	Site allocation: SBA4: Exe Bridges Retail Park	Policy does not explain sufficiently the phasing of development, nor the need to retain the retail function of the site.	'A site of 1.8 hectares at Exe Bridges Retail Park is identified for a mixed use development with the potential to deliver ing approximately 201 homes, retail and an attractive public realm in the latter stages of the plan period . The development must support the achievement of net zero and accord with the Liveable Exeter Principles to deliver a compact and well connected neighbourhood, incorporating the highest standards of design whilst retaining the retail	To support retention of the site's current retail function alongside future residential development. Also, to reflect the likely phasing of development towards the end of the plan period. Relevant representation: NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd

Suggested Main Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			function of the site within the St Thomas District Centre.	
SMM98	T11: Topsham Infrastructure Delivery Framework	Policy does not provide sufficient detail regarding education needs.	Amend policy to read: 'The Infrastructure Delivery Framework will include: A. The timely delivery and funding of a range of infrastructure and facilities including early years , primary education, secondary education and special educational needs provision , primary healthcare...'	To clarify the requirement to consider the full range of potential education requirements. Devon County Council supports the suggested modification (see DCC Statement of Common Ground). Relevant representation: Devon County Council
SMM99	T11: Topsham Infrastructure Delivery Framework	Policy does not appropriately explain the implementation of the future Topsham Infrastructure Delivery Framework.	At the end of the policy, add: ' 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 '.	To clarify how the future Topsham Infrastructure Delivery Framework should be applied to development proposals in the area. Relevant representation: East Devon District Council.

3.0 Schedule of suggested potential modifications: Suggested additional (minor) modifications

- 3.1. As per the Procedure Guide for Local Plan Examinations, additional (minor) modifications may be suggested by the Local Planning Authority. A series of additional minor modifications are suggested in this schedule. These suggested modifications only address the supporting text and not the policies in the Plan.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
1. Explaining the Exeter Plan				
SAMM1	Paragraph 1.18: National planning reforms:	Reference to national planning policy reforms needs updating.	Amend paragraph 1.18 to read: 'Because the The Exeter Plan has was published on 12 December 2024, the same day as the new NPPF. Because the Plan was published within 12 weeks of publication of the new NPPF, and because the housing requirement figure in the Plan was 80% of the updated housing need established by the revised standard method, the Plan is progressing under the transitional arrangements for plan- preparation set out in paragraph 234a of the December 2024 NPPF. This means that the Exeter Plan will continue to be progressed under the December 2023 NPPF. progressed to Publication Plan stage before the updated NPPF is published by the	To update the Exeter Plan so it appropriately addresses national planning policy and legislation.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Government following consultation, the Plan accords with the December 2023 version of the NPPF. The Plan also meets the housing requirements which were set out prior to the 2024 national consultation.	
2. Exeter: Ancient city – ambitious future				
SAMM2	Paragraph 2.7: Exeter: Ancient city – ambitious future:	Text suggests that Exeter's ethnic diversity sets the city apart from surrounding areas.	Amend text to read: 'The diverse ethnic groups that make up Exeter's cultural and social fabric help to set the city apart from the surrounding rural area and provide for a vibrant community.'	To ensure the focus is on the positive implications of ethnic diversity. Relevant representation: Hilary Winter.
3. This is our city, this is our future				
No suggested additional modifications.				
4. Spatial strategy				
No suggested additional modifications.				
5. Climate change				
SAMM3	Paragraph 5.14: Renewable and low carbon energy.	Text refers, in error, to policy HH2, rather than HH4.	Amend text to read: 'Additional guidance on proposals involving heritage assets is provided in Policy HH2 HH4: Heritage assets and climate change.'	To correct an error. Relevant representations: Exeter Civic Society.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM4	Paragraph 5.17: Local energy networks.	Text explains the potential for local energy networks but does not refer to potential archaeological impacts	Include an additional paragraph after paragraph 5.17 as follows: ‘A Local Development Order has been in place since 2019 which grants permitted development rights for local energy networks and associated infrastructure on or under land within large parts of the Exeter administrative area. The potential impacts on archaeology will need to be considered when establishing the feasibility of a heat network. Additionally, the City Council has successfully designed and implemented an archaeological monitoring requirement in conjunction Devon County Council Highways licencing for infrastructure projects’.	To ensure that archaeological impacts are fully considered by proposals for local energy networks. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.
SAMM5	Paragraph 5.20: Ground-mounted photovoltaic arrays.	Text states that ground-mounted arrays will not be suitable for all sites, but does not exclude allocated sites.	Insert text to read: ‘Ground-mounted arrays will not be suitable for all sites. Within Exeter’s urban boundary, sites allocated for other forms of development are unlikely to be suitable. The visual impact...’	To provide clarity. Relevant representations: Chex Developments Exeter Civic Society
SAMM6	Paragraph 5.24: Future development standards.	Text does not indicate how and when the requirements of	Insert text to read:	To add explanation of how and when

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		Policy CC5: Future Development Standards will be secured.	“This provides a local back-up to the national ambition and will be secured through condition or legal agreement until equivalent requirements are introduced through building regulations.’	requirements will be secured.
SAMM7	Paragraph 5.32 (second bullet point): Development that is adaptive and resilient to climate change.	Text explains the issues that are key to reducing flood risk and aiding recovery from flooding but only discourages large artificial and impermeable surfaces.	Amend text to read: ‘Developments with large artificial and impermeable ground surfaces are discouraged;’	To help address combined sewer issues and ensure clarity. The Environment Agency supports the suggested text change (see EA SoCG). Relevant representation: Environment Agency.
SAMM8	Paragraph 5.32 (third bullet point): Development that is adaptive and resilient to climate change.	Text explains the issues that are key to integrating biodiversity into the built environment but does not refer to the most recent guidance.	Amend text to read: ‘The Residential Design Guide Supplementary Planning Document provides helpful guidance, including in relation to bat and bird box provision and more recent guidance is provided by BS 42021:2022 and the Future	To refer to more up-to-date guidance. Relevant representation: RSPB.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Homes Hub's Homes for Nature Guidance Document;	
SAMM9	Paragraph 5.34: Flood risk.	Text explains the implications of climate change but is not comprehensive.	Insert additional text at the end of paragraph 5.34 to read: 'Furthermore, there may be increases in the intensity of heavy summer rainfall events and sea level will continue to rise.'	To adequately summarise all consequences of climate change. The Environment Agency supports the suggested text change (see EA SoCG). Relevant Representation: Environment Agency,
SAMM10	Paragraph 5.35: Flood risk.	Supporting text explains the sustainability benefits of development in the urban area on brownfield sites but text could be clearer.	Amend text to read: 'However, development in the urban area on brownfield sites has significant and widespread benefits, including the potential to help mitigate climate change by limiting minimising the need to travel...'	To improve clarity and better explain the impact on travel.
6. Homes				
SAMM11	Paragraph 6.4: Housing requirement.	Text refers to a plan period of 2021 to 2041 rather than 2022 to 2042.	Amend text to read: 'Policy H1 sets out our proposed approach to meeting the housing requirement for Exeter, identifying	To ensure the text reflects SMM1.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			four sources of housing supply between 2021 2022 and 2041 2042.'	
SAMM12	Paragraph 6.4: Housing requirement.	Text refers to the housing supply figure correct at the time of Plan Publication, not to the figure that was correct at the time of Submission.	Amend text to read: 'The total supply of 13,975 14,119 homes for twenty years allows for a healthy headroom above the requirement of 642 new homes per year.'	To ensure the text reflects SMM8.
SAMM13	Paragraph 6.5: Housing requirement.	Text refers to the housing supply figures that were correct at the time of Plan Publication, not to the figures that were correct at the time of Submission. Also, text refers to a Plan period starting in 2021, as opposed to 2022.	Amend text to read: 'Just over 2,300 1,900 homes have been built in Exeter since April 2021 2022 and planning consents (including permissions awaiting Section 106 Agreements) are in place for to deliver a further 5,300 5,420 homes approximately during the Plan period . In addition, we anticipate that around 1,000 2,000 homes will be built on windfall sites during the Plan period. This is based on the average annual number of homes built on windfall sites in Exeter over the past ten years'.	To ensure the text reflects SMM8.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM14	Paragraph 6.6: Housing requirement.	Text refers to the housing supply figure that was correct at the time of Plan Publication, not to the figure that was correct at the time of Plan Submission.	Amend text to read: 'As Policy H1 shows, to meet the housing requirement and provide for choice and competition in the market we are allocating sites for around 5,370 4,770 new homes. As well as housing, larger sites will provide employment and various other uses and infrastructure to ensure high quality new neighbourhoods.'	To ensure the text reflects SMM8.
SAMM15	Paragraph 6.7: Housing requirement.	Text refers to the housing supply position at the time of Plan Publication, not to the housing supply position at the time of Plan Submission.	Amend supporting text to read: 'The 2024 August 2025 Exeter Five Year Housing Land Supply Statement shows that the City Council can currently demonstrate a housing land supply of just under five years and seven months (including the contribution made by purpose built student accommodation). Based on planning applications in the pipeline and progress that is already being made towards delivering homes on some of the site allocations, the City Council is confident that it will be able to demonstrate there will be a five year housing land supply at the	To ensure the Plan reflects the August 2025 Five Year Housing Land Supply Statement which identifies a specific, deliverable supply of sites for five years following the intended date of adoption of the Exeter Plan.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			point of adopting the Exeter Plan. Further information, including a housing trajectory, is provided in the Monitoring and Implementation chapter of the Plan.'	
SAMM16	Paragraph 6.7: Housing requirement.	Text does not refer to the NPPF's requirement to consider unmet housing needs of neighbouring areas, nor to how this applies to Exeter.	Insert new paragraph (after existing paragraph 6.7) to read: 'When setting a local housing requirement, the NPPF requires local authorities to take into account any unmet housing needs of neighbouring areas. The City Council and East Devon, Mid Devon and Teignbridge District Councils broadly operate as one Housing Market Area (the Exeter HMA), with Torbay comprising a separate HMA, albeit with some functional links with the Exeter HMA. Through Duty to Cooperate discussions, it has been agreed that East Devon, Mid Devon and Teignbridge District Councils do not require Exeter to accommodate any of their local housing needs. Torbay Council agrees that Exeter cannot accommodate any of its unmet local housing need due to	To provide the cross-boundary / sub-regional context to Exeter's housing requirement, including with reference to meeting any unmet local housing needs of other local authorities. Torbay Council supports the suggested text change (see Torbay Council Statement of Common Ground). Relevant representation: Torbay Council.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			capacity constraints in the city administrative area.'	
SAMM17	Paragraphs 6.9: Housing allocations and windfall sites.	SMM10 suggests a modification to the capacity of Water Lane. As a result of the modified capacity, the housing trajectory assumes that development at Water Lane will not be completed during the Plan period.	Insert new paragraph between existing paragraphs 6.9 and 6.10 to read: 'The majority of the sites can be built within twenty years. The exception is the largest strategic brownfield site at Water Lane which is likely to take more than twenty years to be fully redeveloped. Policy H2 indicates how many homes we expect Water Lane could provide by 2042, whilst policy SBA1 indicates how many homes we expect Water Lane will provide in total.'	To ensure the text reflects SMM10 and to provide clarity.
SAMM18	Paragraph 6.11: Housing allocations and windfalls.	Text provides limited information about the site capacities in Policy H2.	Amend text to read: 'The housing capacities in Policy H2 are net of any existing homes on a site and reflect the approximate number of self-contained homes a site will be expected to deliver. If a site is developed for homes that are not self-contained (for example, a care home or cluster flats in purpose built student accommodation), the contribution	To clarify that capacities are approximate (see SMM9) and that they relate to the number of self-contained homes each site is considered capable of delivering, rather than any other unit of accommodation (e.g. bedspaces).

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			those homes make to the housing supply will be calculated using the relevant Housing Delivery Test ratio (see paragraphs 6.37, 6.48, 6.53 and 6.63 for more information).'	Relevant representation: Nixon Homes Limited and Telereal Scrutinised Property GP Limited.
SAMM19	Paragraph 6.12: Housing allocations and windfall sites.	Text implies that residential gardens are not windfall sites, which does not reflect the NPPF.	Amend text to read: 'Housing development on windfall sites and residential gardens within the urban boundary will be supported subject to consideration of all relevant policies in the development plan.'	To accurately reflect the definition of a windfall site in paragraph 72 of the 2023 NPPF. Relevant representation: Exeter Civic Society.
SAMM20	Paragraph 6.13: Regeneration opportunity areas.	Text does not explain some of the main issues associated with comprehensive regeneration proposals.	Amend paragraph 6.13 and add additional paragraphs to follow, to read: 6.13 In accordance with the spatial strategy's focus on brownfield development at optimal densities, the City Council will support the comprehensive regeneration of brownfield land as set out in Policy H3. This includes proposals for comprehensive regeneration redevelopment within the regeneration opportunity areas at North Gate and the northern part of Marsh	To clarify and provide further details about how key constraints affecting North Gate and Marsh Barton should be considered. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Barton, two sites which were originally included in the Liveable Exeter initiative, although opportunities for regeneration may occur anywhere within the urban boundary. It should be noted that the regeneration opportunity areas at North Gate and Marsh Barton do not have the same status as allocations. '6.14 In the case of North Gate, heritage will be a critical consideration for comprehensive regeneration proposals given the exceptional historic significance and sensitivity of assets in the North Gate area. These include the Central Conservation Area, the City Walls, views of the cathedral, listed buildings, other designated and non-designated heritage assets, archaeology including the designated Area of Archaeological Importance, as well as any important local and strategic views. Development proposals will also need to consider the relationship with the allocations at Mary Arches Multi-Storey and Surface Car Park and	representation: Historic England. NB: Historic England raised specific concern regarding North Gate. Suggested modifications for Marsh Barton are for consistency because it is also cited as a regeneration opportunity area.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Fever and Boutique, 12 Mary Arches Street’. ‘6.15 In the case of Marsh Barton, flood risk will be a critical consideration for comprehensive regeneration proposals given the location of the area largely within flood zone 3. Development proposals will also need to consider the relationship with the strategic brownfield mixed use allocation at Water Lane.’ ‘6.16 The full range of policies within the Exeter Plan will be applied to the regeneration opportunity areas and elsewhere in the context of comprehensive regeneration proposals. Pre-application discussions will be particularly important’.	
SAMM21	Paragraph 6.15: Affordable housing.	Text incorrectly implies that the subsidy for social rent and the cost of providing social rent are not connected.	Amend first bullet point to read: ‘This type of affordable housing also therefore generally costs the most to provide.’	To clarify the relationship between social rent subsidy and provision cost.
SAMM22	Paragraph 6.15: Affordable housing.	Text contains a grammatical error.	Amend second bullet point to read:	To correct a grammatical error.

Suggested Additional Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			‘These homes give the occupants the options to buy at subsidised prices in various ways, either immediately or after some years of living in the properties.’	
SAMM23	Paragraph 6.20: Affordable housing.	Text provides details of the process for considering scheme viability, but it is not fully consistent with suggested additional modifications to Policy IF2 (SMM82-84) and would also benefit from a cross-reference to Policy IF2.	Amend text to read: ‘ The City Council will only accept a departure from the percentages if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant. Where the City Council accepts a less than policy compliant amount of affordable housing on grounds of viability, an overage clause will be sought in the Section 106 Agreement in respect of future profits and affordable housing provision. The need for an overage payment will be established through the submission of a development account by the developer once the scheme has been completed. The City Council may also reappraise viability on subsequent phases of large schemes. Requirements of the appraisal process are provided in Policy IF2’.	To ensure consistency with, and avoid repetition of, Policy IF2.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM24	Paragraph 6.26: Build to rent.	Text states that when applying the requirement for 20% affordable private rent, the calculation will be rounded to the nearest whole number. This is inconsistent with the approach taken by Policy H4: Affordable housing.	Amend text to read: 'When applying this percentage, the calculation will be rounded to the nearest whole number. Where the percentage does not equate to a whole number of homes, a financial contribution will be sought to provide part of an affordable private rent home based on a methodology to be published on the City Council's website, with costs updated annually. Contributions will be used by the City Council for the provision of affordable housing in Exeter.'	To ensure a consistent approach across Policies H4 and H5.
SAMM25	Paragraph 6.33: Co-living housing.	Text contains a spelling mistake.	Amend text to read 'Co-living generally provides accommodation for single, young professionals who cannot or choose not to live in self-contained houses homes, flat shares or HMOs.'	To correct a spelling mistake.
SAMM26	Paragraph 6.37: Co-living housing.	Text refers to the Housing Delivery Test Measurement Rulebook ratio that was correct at the time of Plan Publication. It should refer to the ratio that was correct at the time of Plan	Amend text to read: 'As a form of communal housing, co-living will count towards Exeter's housing requirement at a	To ensure consistency with the 2024 Housing Delivery Test Rulebook.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		Submission.	ratio of 1.8: 1.9 bedspaces to 1 home.'	Relevant representation: Nixon Homes Limited.
SAMM27	Paragraph 6.38: Custom and self-build housing.	Text states that Policy H7 is the primary means by which the City Council intends to meet the demand for custom and self-build housing in Exeter. However, if Policy H7 is modified as suggested (see SMM34), then the supporting text would benefit from modification.	Amend text to read: '...The City Council also has a legal duty to grant enough planning consents to meet the level of demand for custom and self-build housing expressed by the register. Policy H7 is the primary means by which the City Council intends to meet that legal duty. To help address this demand, Policy H7 requires developments of twenty or more homes to make 5% of the homes available as serviced plots for sale to would-be custom or self-builders. The City Council will also support developments for 100% custom and self-build housing, subject to compliance with relevant policies in the Exeter Plan including Policy H7.'	To clarify how the City Council proposes to meet the demand for custom and self-build housing expressed by the Register.
SAMM28	Paragraph 6.41: Custom and self-build housing.	Text refers to serviced plots secured under criterion a of the policy. However, this will be misleading if the policy is modified as suggested by SMM34.	Amend text to read: 'Serviced plots secured under criterion 'a' of through the 5% plot requirement of Policy H7 must be provided onsite and made	To ensure the text reflects SMM34, to clarify which forms of residential development will be exempt from the 5%

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		Also, text doesn't make it clear that the 5% CSB plot requirement will not apply to forms of residential development that are not compatible with CSB delivery. Also, text contains a spelling error.	available for sale to a custom or self-builder before construction has commenced on 50% of the other homes on the site. When applying the percentage in the policy, the calculation will be rounded to the nearest whole number. On phased developments that meet the policy threshold of twenty homes, each phase should meet the percentage requirement. The 5% requirement will not apply where the type of housing proposed is not compatible with onsite provision of custom or self-build plots – for example, build to rent housing (including co-living), purpose-built student accommodation and supported housing. For all other developments of twenty or more homes, the City Council will only accept a departure from the percentage 5% requirement if it agrees that scheme viability will be affected, based on a full development appraisal submitted by the applicant. Financial contributions in lieu of on-site onsite provision will only be	plot requirement and to correct a spelling error.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			considered acceptable where the City Council agrees that onsite provision will prejudice delivery of the wider scheme. Financial contributions will be based on up to date evidence of custom and self-build plot values.'	
SAMM29	Paragraph 6.42: Custom and self-build housing.	Text implies that criterion a to d of Policy H7 only apply to serviced plots for custom and self-build housing secured through the plot percentage requirement, rather than to all development that includes custom and self-build housing.	Amend text to read: 'Applicants for development that includes serviced plots for custom and self-build housing should offer a range of serviced plot sizes.'	To clarify that criterion a to d of Policy H7 apply to all developments that include serviced plots for custom and self-build housing.
SAMM30	Paragraph 6.46: Homes for older people.	Text does not refer to extra care housing as an example of housing for older people that has locational requirements.	Amend text to read: 'Where relevant, specialist homes for older people, such as extra care housing , should be located within easy walking distance (ideally no more than 400 metres) of local shops, services and facilities, including a bus stop or train station.'	To provide an example of the type of housing for older people that has locational requirements. Devon County Council supports the suggested text change: See DCC Statement of Common Ground.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
				Relevant representation: Devon County Council.
SAMM31	Paragraph 6.48: Homes for older people.	Text refers to annex 8 of the Government's Supported Housing: National Statement of Expectations. It should refer to annex A.	Amend text to read: 'Homes for older people should adhere to the accommodation standards in annex 8 A of the Government's Supported Housing: National Statement of Expectations.'	To correct a spelling error. Devon County Council supports the suggested text change: See DCC Statement of Common Ground. Relevant representation: Devon County Council.
SAMM32	Paragraph 6.48: Homes for older people.	Text refers to the Housing Delivery Test Measurement Rulebook ratio that was correct at the time of Plan Publication. It should refer to the ratio that was correct at the time of Plan Submission.	Amend text to read: 'Residential care and nursing homes are forms of communal housing and will therefore count towards Exeter's housing requirement at a ratio of 1.8 1.9 bedspaces to 1 home , in accordance with the Housing Delivery Test Rulebook.'	To ensure consistency with the 2024 Housing Delivery Test Rulebook.
SAMM33	Paragraph 6.52: Supported housing.	Text refers to annex 8 of the Government's Supported Housing: National Statement	Amend text to read:	To correct a spelling error.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		of Expectations. It should refer to annex A.	'All supported housing should adhere to the accommodation standards in annex 8 A of the Government's Supported Housing: National Statement of Expectations.'	Devon County Council supports the suggested text change (see Devon County Council Statement of Common Ground). Relevant representation: Devon County Council.
SAMM34	Paragraph 6.52: Supported housing	Text would benefit from a modification to amplify SMM38, which suggests introducing a policy requirement for development proposals to be accompanied by a Management Plan.	Amend text to read: '...against Policy H12. All planning applications for supported housing must be accompanied by a Management Plan to be agreed with the City Council and secured through a Section 106 Agreement. The Management Plan must show how the supported housing will be managed and maintained to a high quality. Matters to be covered may include: • On-site management; • Security and fire safety procedures; • The maintenance of internal	To ensure that supported housing is well managed.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			and external areas; • The cleaning of communal and private areas; and • The management of refuse facilities and deliveries.'	
SAMM35	Paragraph 6.53: Supported housing.	Text refers to the Housing Delivery Test Measurement Rulebook ratio that was correct at the time of Plan Publication. It should refer to the ratio that was correct at the time of Plan Submission.	Amend text to read: 'Shared forms of supported housing will count towards Exeter's housing requirement at a ratio of 1.8: 1.9 bedspaces to 1 home, in accordance with the Housing Delivery Test Rulebook.'	To ensure consistency with the 2024 Housing Delivery Test Rulebook.
SAMM36	Paragraph 6.55: Purpose built student accommodation.	Text states that 64% of new students since 2006/7 were housed in purpose built student accommodation by 2022. This data is now out of date and the percentage varies annually.	Amend text to read: '...Since 2006/07, the University and City Council have also shared a target for at least 75% of additional student numbers to be housed in purpose built student accommodation. Progress is being made to achieving this target, with 64% of new students since 2006/7 being housed in purpose built student accommodation by 2022. This target is retained in the Exeter Plan.'	To avoid unhelpful reference to dated information.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM37	Paragraph 6.57: Purpose built student accommodation.	Text contains repetitive text.	Amend text to read: 'Consideration will be given to the potential local impacts of development so that potential issues for amenity are avoided and addressed appropriately in the context of the importance of mixed communities.'	To remove repetitive text.
SAMM38	Paragraph 6.58: Purpose built student accommodation.	Text contains a spelling error.	Amend penultimate bullet point in the text to read: • 'The management of refuse facilities and deliveries; and'	To correct a spelling error. Relevant representation: Exeter Civic Society.
SAMM39	Paragraph 6.63 Purpose built student accommodation.	Text refers to the Housing Delivery Test Measurement Rulebook which was correct at the time of Plan Publication. It should refer to the ratio that was correct at the time of Plan Submission. Text also refers generically to student accommodation, rather than to purpose built student accommodation.	Amend text to read: 'In accordance with Planning Practice Guidance, purpose built student accommodation provided as studio flats will count towards Exeter's housing requirement on a 1:1 basis. All other forms of student accommodation will be regarded as communal housing and will therefore count towards Exeter's housing requirement on at a ratio of 1-8 1.9 bedspaces to 1 home, as the per the Housing delivery Test Rulebook.'	To ensure consistency with the 2024 Housing Delivery Test Rulebook and to correct grammatical errors. Relevant representations: Chex Developments Limited C/O Zinc RE UK Limited and Nixon Homes Limited.

Suggested Additional Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SMM40	Paragraph 6.66: Gypsy and Traveller accommodation.	Text states that, over the Plan period, there is a need for one pitch for a household whose status is underdetermined. This is incorrect.	Amend text to read: ‘The assessment indicates a need for five permanent pitches for households who do not meet the planning definition and up to one pitch for a household whose status is undetermined.’	To accurately reflect the conclusions of the 2024 Exeter Gypsy and Traveller Accommodation Assessment.
SMM41	Paragraph 6.68: Gypsy and Traveller accommodation	Text would benefit from a modification to amplify SMM42, which suggests introducing a policy requirement for development proposals to be accompanied by a Management Plan.	Add new paragraph after paragraph 6.68 to read: ‘ Planning applications for multi-plot/pitch sites must be accompanied by a Management Plan to be agreed with the City Council and secured through a Section 106 Agreement. The Management Plan must show how the site will be managed and maintained to a high quality. Matters to be covered may include: • On-site management; • Security and fire safety procedures; • The maintenance and cleaning of communal areas and facilities; and • The management of refuse facilities and deliveries.’	To ensure that supported housing is well managed.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM42	Paragraph 6.69: Gypsy and traveller accommodation.	Due to changes made to the planning definitions of Gypsies, Travellers and Travelling Showpeople, Devon County Council requests that the text is amended to commit the City Council to reviewing the need for Gypsy and Traveller accommodation within five years.	Add a new paragraph after paragraph 6.69 to read: ‘A review of the need for, and delivery of, gypsy and traveller accommodation will be undertaken as part of a wider future plan review in the context of the monitoring and implementation framework of the Exeter Plan and updates to national planning policy.’	To ensure a robust approach is taken towards meeting the accommodation needs of Gypsies and Travellers. Devon County Council supports the suggested text change (see DCC Statement of Common Ground). Relevant representation: Devon County Council.
SAMM43	Paragraph 6.71: Residential conversions and houses in multiple occupation.	Text currently does not refer to the impact of HMOs on local sewerage network, which is of concern to the Environment Agency.	Amend text to read: ‘...to flats or HMOs. Due to their potential to intensify foul flows, it will be important for HMO proposals to comply with Policies CC7, CC8 and CC9 and demonstrate that there will be no harm to drainage or water quality.’	To ensure that the Exeter Plan manages the potential impact of HMOs on drainage and water quality. The Environment Agency supports the suggested text change (see EA Statement of Common Ground).

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				Relevant representation: Environment Agency.
SAMM44	Paragraph 6.72: Residential conversions and houses in multiple occupation.	Text contains a grammatical error and a spelling mistake.	Amend text to read: 'The City Council defines over-concentration as 20% or more of homes in a postcode and or adjoining postcodes being HMOs.'	To correct a grammatical error and a spelling mistake.
SAMM45	Paragraph 6.77: Accessible homes.	Text (second sentence) refers to dwellings of different categories, but it is not clear what this means.	Amend text to read: 'Where any part of an approach route (including the vertical circulation in communal areas of a multi-storey development) is shared between dwellings of different Part M categories, the design provisions of the highest numbered category of home served should be applied.'	To provide clarity.
SAMM46	Paragraph 6.78: Accessible homes.	Text refers to the subdivision of category M4(3) homes but could provide greater clarity.	Amend text (first sentence) to read: 'Category M4(3) is subdivided into wheelchair adaptable (M4(3)a : a home that can easily be adapted to meet the needs of a wheelchair user) and wheelchair accessible (M4(3)b : a home readily useable	To provide clarity. Relevant representation: Home Builders Federation.

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			by a wheelchair user at the point of completion).’	
SAMM47	Section: Housing density and size mix.	Policy and text cover matters of housing density and size mix only. Suggested modification SMM50 would increase the policy’s scope, to include consideration of housing type mix.	Amend title of the section to read: ‘Housing density, and size and type mix’	To ensure the text reflects SMM50.
SAMM48	Paragraph 6.82: Housing density and size mix.	Text covers matters relating to housing density and size mix, but not the mix of housing types. The text also contains spelling mistakes.	Amend text to read: ‘The housing density of a development is linked to the number of bedrooms provided within each new home. It is important that new housing development includes a mix of house sizes to help meet local needs. The 2024 LHNA indicates that market and affordable homes of all sizes will be are needed in Exeter to 2041 , but particularly two and three bedroomed properties and significant numbers of one bedroomed homes. Family housing should not be omitted from new developments due to a concentration on densities and the range of proposed house ing sizes must support the creation or	To ensure the text reflect SMM50 and SAMM47 and to correct spelling mistakes.

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			maintenance of mixed communities. New housing development should not cause an over-concentration of a particular housing type, to the extent that the character of the locality would be harmed, including in relation to community mix.'	
7. Economy and jobs				
SAMM49	Paragraph 7.3: Economic development needs.	Text refers to analysis of economic forecasts but not of other evidence	Amend text to read: 'The work has been undertaken through an analysis of the economic forecasts and other evidence to establish need, a review of the current employment land to establish supply, and a comparison between need and supply to reach conclusions.'	To include reference to analysis of other evidence.
SAMM50	Paragraphs 7.4-7.5: Economic development needs.	Text refers to the Functional Economic Market Area (FEMA) but does not include sufficient detail relating to employment needs and supply across the area.	Amend paragraph 7.4 to read: 'Forecasts consider various scenarios for employment land requirements across the FEMA. There is a forecasted mid-point demand need for up to 255 284 hectares of employment land in the FEMA over the Plan period, with a clean growth scenario (which incorporates a 'policy-on'	To include greater detail regarding need and updated supply across the FEMA to ensure clarity regarding how Exeter's employment provision sits within the wider FEMA context and to highlight that the

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			uplift to growth in the Information & Communication and Professional, Scientific & Technical Activities sectors in recognition of the Councils' policy and strategy approaches that look to drive economic growth whilst also achieving net-zero carbon targets) mid-point of 258 hectares. The current available supply of sites across the FEMA amounts to approximately 349 229 hectares of employment land, of which 227 hectares are rated Green or Amber and 2 hectares are rated Red. Across the FEMA the need and supply position in relation to employment land is as follows: Add table as per Appendix B. Therefore, across the FEMA supply exceeds forecast need by approximately 94 hectares. Under the 'Clean Growth' policy-on scenario there is an overprovision across the FEMA of approximately 91 hectares. It is clear therefore that sufficient employment land is available	economic needs across the FEMA are being met. Relevant representations: Various.

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			across the FEMA to meet forecast employment need. the EDNA concludes that over the twenty year Plan period, there is insufficient employment land currently available in Greater Exeter to meet the forecast demand and more sites need to be allocated in order to meet that demand. Amend paragraph 7.5 to read: 'Whilst a limited amount of the overall need for additional land is met within Exeter's constrained urban boundary, this fits with the conclusions of the EDNA which specifically states for Exeter, the EDNA concludes that some of the future economic growth stimulated by the city will need to be accommodated in its hinterland in adjoining local authority areas, which is-are functionally part of the city area and that future employment growth in areas adjoining the city (the city fringe) could reduce levels of commuting into Exeter itself. However, it should also be	

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			recognised that much economic activity and growth is not dependent on new land allocations, with growth continuing on existing sites and with many sectors of the economy not requiring employment sites and premises; therefore, significant economic growth will continue to occur within Exeter.'	
SAMM51	Paragraph 7.6: Economic development needs.	Text refers to policies within the chapter that contribute to meeting economic development needs but does not cross reference to these.	Amend text to read: 'Policies within this chapter maximise the potential of Exeter to contribute to meeting economic development needs by supporting development proposals that meet the economic needs identified in the EDNA and encouraging the priority and transformational sectors (EJ1), retaining established employment areas and other employment sites (EJ2), delivering new forms of employment provision (EJ3) and allocating new employment sites (EJ6). The partner authorities (the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council) are committed to	To add clarity and aid understanding. Relevant Representation: Exeter Civic Society.

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			continuing to work together, in accordance with the duty of cooperate, to address any shortfall in employment land and to ensure the continued economic success of the wider area'.	
SAMM52	Paragraph 7.7: Economic growth.	Text refers to the opportunities for economic growth, but not to the UK's modern industrial strategy.	Amend text to read: 'There is significant potential in Exeter to take full advantage of the opportunities for economic growth. Invest 2035: The UK's Modern Industrial Strategy identifies priority sectors for growth and support as: • Advanced manufacturing; • Clean energy industries; • Creative industries; • Defence industries; • Digital and technology businesses; • Financial services; • Life sciences; and • Professional and business services. There will be a particular focus on unlocking further growth potential within the knowledge economy.	To Insert reference to 'Invest 2035: The UK's modern industrial strategy' and to ensure it is clear that Exeter's economic strategy has a good fit with the UK Modern Industrial Strategy.

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			especially the transformational sectors. is the opportunity for many of these sectors to grow within Exeter and this strategy fits well with the City Council's commitment to Exeter becoming one of the United Kingdom's leading knowledge and clean growth economies.'	
SAMM53	Paragraph 7.7: Economic growth.	Text refers to the need for economic growth but does not refer to the clean growth scenario or to the potential for jobs.	Add new paragraph after paragraph 7.7 to read: 7.8 The EDNA considers a higher growth scenario, the Clean Growth Scenario, that captures this growth potential. All partner authorities within the FEMA are committed to strive to meet this higher growth potential, with the evidence suggesting that Exeter's economic strategy will deliver in excess of 14,900 jobs in the city boundary over the plan period.	To insert reference to the 'clean growth scenario' and to set out the potential to deliver in excess of 14,900 jobs in Exeter. Relevant representations: Various
SAMM54	Paragraph 7.8: Economic growth.	Text correctly identifies Exeter's transformational sectors but needs amending to link to new text suggested above.	Amend text to read: 7.8 Transformational sectors that have potential for growth in Exeter include Within Exeter there will be a particular focus on meeting the needs of the priority sectors	To insert text linked to other suggested modifications set out above.

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			through the following transformational sectors:...	
SAMM55	Paragraph 7.10: Economic growth.	Text refers to the contribution that the transformational sectors can make to the economy but not to the priority sectors.	Amend text to read: ‘...Evidence indicates that the priority and transformational sectors have the potential to make the greatest contribution to increasing productivity and earnings within Exeter...’	To make reference to the priority sectors and to be consistent with other suggested modifications set out above.
SAMM56	Paragraph 7.12: Retention of employment land.	Text seeks to protect the established employment areas but additional explanatory text is needed to be clear as to when and how the policy will apply.	Amend text to read: ‘The established employment areas make an important contribution to meeting the city’s employment needs and will therefore be retained in employment use. Any development or redevelopment requiring planning permission should be for employment purposes within Use Class B2 (general industrial), Use Class B8 (storage and distribution) and Use Class Eg (including Eg (i) offices, Eg (ii) research and development and Eg (iii) industrial processes). These are the traditional employment uses that often struggle to find appropriate sites or land. Where permission is	To ensure it is clear that Policy EJ2 only applies when planning permission is required and to stipulate that conditions/legal agreement may be applied to restrict future use. Relevant Representation: Exeter Civic Society.

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			granted for new development conditions or S106 may be imposed to limit future use to these traditional employment use classes.'	
SAMM57	Policy title and paragraph 7.27: New transformational employment allocations.	Text refers to site allocations for the transformational sectors but consideration of representations indicates a more flexible open approach should be taken to these new employment allocations	Amend title to read: 'New transformational employment allocations' Amend para 7.27 to read: 'New employment sites are allocated in Policy EJ6 to help meet Exeter's employment needs as identified in the Economic Development Needs Assessment. the specific requirements of the transformational sectors. Allocating sites which are suitable for the priority and transformational sectors employment development can help remove barriers to delivery and act as a catalyst for further growth.'	To move away from a particular focus on the transformational sectors and to take a more balanced approach that allows the newly allocated sites to be developed for any use that helps to meet the economic development needs of the city. Relevant representations: Various.
SAMM58	Paragraph 7.28: New transformational employment allocations.	Text refers to the transformational sectors, but consideration of representations indicates a more flexible open approach	Amend text to read: '...these transformational employment allocations will provide...'	To ensure consistency with changes above.

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		should be taken to these new employment allocations.		
SAMM59	Paragraph 7.29: New transformational employment allocations.	Text refers to the transformational sectors but consideration of representations indicates a more flexible approach should be taken to these new employment allocations.	Amend text to read: 'The sites' accessibility will be attractive to speculative development for transformational uses and could provide accommodation for start-ups.'	To ensure consistency with changes above.
SAMM60	Paragraph 7.31: New transformational employment allocations.	Text sets out requirements that need to be considered but makes little reference to heritage impacts.	Amend paragraph 7.31 and add an additional paragraph to read: '7.31 Proposals at St Luke's will need to be of a high quality and appropriate in the context of the wider residential area. Proposals will need to demonstrate regard for the environmental and heritage assets on the site and in the surrounding area. Proposals will also need to be informed by the Exeter Views, Density and Heights Study. There are heritage assets within and around St Luke's Campus, including conservation areas covering much of the surrounding residential area, and the Grade II listed properties on Baring Crescent adjoining the site's eastern boundary.	To clarify that the proposals for demolition and rebuild will focus on the east of the site (protecting the heritage of the site and surroundings) to ensure heritage assets are protected and to provide more guidance on the form the development needs to take. Historic England supports the suggested text change (see Historic England Statement of Common Ground).

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			Development at the St Luke's campus should be of a high quality and consider and respond to the environmental and heritage assets on and around the site including important strategic and local views. Development should be appropriate within the context of surrounding residential development. New paragraph 7.32 The focus for significant development at St Luke's Campus should be on the eastern side of the site, particularly respecting the defining features of the quad and North Cloister building. Development will be informed by archaeological and heritage assessment and be guided by a masterplan /Supplementary Planning Document. Proposals will also need to be informed by the Exeter Skyline Study.'	Relevant representation: Historic England.
SAMM61	Paragraph 7.33: New transformational employment allocations.	Text refers to approach to be taken in relation to the transformational sectors.	Amend text to read: Most transformational employment uses are within	To ensure consistency with changes above and to refer to the

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			planning Use Class E: Commercial, Business and Service, meaning they can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke soot, ash, dust or grit. A gateway requirement (enforced through condition or Section 106 Agreement) may be imposed to limit the future use of new developments to those within the transformational sectors. The new employment allocations are suitable for a range of employment uses within Use Class B2 (general industrial), Use Class B8 (storage and distribution) and Use Class Eg (including Eg (i) offices, Eg (ii) research and development and Eg (iii) industrial processes). Conditions or Section 106 Agreements may be imposed to limit future use to these employment uses.'	potential need for conditions/Section 106 Agreements to ensure development remains within the employment use classes listed.
SAMM62	Paragraph 7.34: New transformational employment allocations.	Policy EJ6 allocates sites but the supporting text does not specifically refer to how development proposals will be	Add new paragraph after paragraph 7.34 to read:	To provide additional explanation regarding the treatment of

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		determined.	'7.34 Proposals for employment development on these sites that help to meet the economic needs of the city as identified in the Economic Development Needs Assessment will be supported, subject to consideration of all relevant policies in the development plan.'	development proposals.
8. Retail and the future of our centres				
SAMM62	Paragraph 8.19: Retail provision in the strategic mixed use allocations.	Text explains the limited retail which is appropriate within the strategic brownfield allocations. However, the allocations at East Gate and the Exe Bridges Retail Park currently include significant retail and will be appropriate for this in future. On this basis, a revision is needed to show that East Gate and Exe Bridges are exceptions in terms of retail.	Amend text to read: 'Proposals for larger scale and comparison retail are unlikely to be appropriate in the strategic mixed use brownfield allocations with the exception of East Gate and Exe Bridges Retail Park because this type of development will draw customers from a wider area, encouraging longer travel distances and potentially competing with the centres.'	To ensure that the existing retail function of parts of East Gate and the Exe Bridges Retail Park are supported by the retail chapter of the plan. See also SMM56.
9. Sustainable transport and communications				
SAMM63	Paragraph 9.4: Sustainable movement.	Text explains the importance of joined up thinking and aligned policies in considering transport issues but does not explain that Exeter has a very large travel to work area.	Amend text to read: 'Exeter has the second largest travel to work area in England. On that basis, addressing development and travel in Exeter requires...'	To ensure that the Plan acknowledges the scale of the Exeter travel to work area and central strategic hub role of the city.

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SAMM64	Paragraph 9.6: Sustainable movement,	Text explains the role of transport in achieving high-level ambitions but does not cover the full range of aspirations.	Amend text to read: ‘...support growth, improve accessibility, reduce social exclusion, improve transport options for those with disabilities and enhance the local environment.’	To ensure that the role of transport in overcoming social exclusion is mentioned. Relevant representations: Exeter Green Party.
SAMM65	Paragraph 9.6: Sustainable movement.	Text presents the importance of sustainable transport but omits to reference cycling, grouping it with wheeling.	Amend text to read: ‘...then sets out a hierarchy which priorities active travel (walking, and wheeling and cycling), public transport...’.	To ensure that cycling is specifically mentioned alongside walking and wheeling and that cycling and wheeling are appropriately differentiated. Relevant representations: Exeter Civic Society.
SAMM66	Paragraph 9.9: Sustainable movement.	Text refers to the importance of Exeter as gateway for strategic transport routes and refers to the need for aviation to address net zero in future. It does not however mention the potential for replacement of diesel trains to play a role here.	Amend text to read: ‘...recognised and addressed in the period up to 2041 2042. In terms of the wider transport network, the City Council supports the potential future replacement of diesel trains with lower emission electric trains together	To acknowledge the role which rail transport and the replacement of diesel rolling stock will play in helping to achieve net zero. Also to reflect SMM1.

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		Text also refers to a Plan period ending in 2041, but SMM1 suggests the end of the Plan period should be 2042.	with the move to electric vehicles on the road network’.	Relevant representation: Network Rail
SAMM67	Paragraph 9.11: The transport hierarchy.	Text presents the transport hierarchy but omits to reference cycling.	Amend text to read: ‘... easier for people to walk, wheel, cycle , or use public transport...’	To ensure that cycling is specifically mentioned alongside walking and wheeling and ensure appropriate differentiation between wheeling and cycling. Relevant representation: Exeter Civic Society
SAMM68	Paragraph after 9.13: The transport hierarchy.	Text explains the cases in which highway improvements may be required but does not sufficiently refer to various appropriate transport policy documents and strategies. .	Add a new paragraph after paragraph 9.13 to read: ‘9.14 The City Council will continue to work with our neighbouring Councils, Devon County Council and National Highways through the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study to monitor and manage the cumulative transport impact of	To ensure the Plan acknowledges the need to work jointly to address strategic transport issues in the context of various policy documents, strategies and studies. National Highways supports the suggested

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			development through future Local Plan reviews’.	modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
SAMM69	Paragraph 9.13: The transport hierarchy.	Text does not explain how funding may be secured for highway improvements or schemes included in the various transport documents.	Add additional text at the end of new paragraph 9.14 (see SAMM68 above) to read: ‘Where necessary, external funding will be sought and agreed between respective parties to address development impacts’.	To show commitment to joint working to secure funding for significant transport schemes. National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
SAMM70	Heading: Active travel proposals.	Heading suggests that only specific schemes are considered in Policy STC3, but it addresses active travel more generally.	Amend heading to read: ‘Active travel proposals’	To clarify that Policy STC3 covers active travel more generally, as opposed to just new proposals.

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SAMM71	Paragraph 9.14: Active travel.	The Plan highlights ambitious aims for trips undertaken using active travel but does not make sufficient reference to various transport policy documents or strategies.	Amend text to read: ‘...meaning that active travel becomes a more attractive option. Scheme delivery will take account of the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study. ’	To ensure the Plan acknowledges the need to deliver active travel mitigation as identified in the context of various policy documents, strategies and studies.
SAMM72	Paragraph 9.22: Public transport.	The Plan highlights ambitious aims for trips undertaken using public transport but does not make sufficient reference to various transport policy documents or strategies and does not mention cross boundary bus service provision.	Amend text to read: ‘...whilst bus services to Exeter Airport should be enhanced. Taking account of the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study, the the City Council will work with Devon County Council and neighbouring authorities to improve bus provision through the Exeter Bus Service Improvement Plan (BSIP) and new development on a cross-boundary basis ’.	To ensure the Plan acknowledges the need to deliver public transport mitigation as identified in the context of various policy documents, strategies and studies. National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.

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SAMM73	Paragraph 9.37: Motorway service area.	Policy STC8 provides in-principle support for the redevelopment and re-provision of the motorway services close to M5 J30 but does not consider when potential new services would need to be opened related to the closure of the current facility.	Amend text to read: ‘...at the site of the current services. The new motorway service area would need to be open before the closure of the existing facility ’.	To ensure clarity over the requirement for a new motorway service to be open in advance of any potential redevelopment of the current services. National Highways supports the suggested modification (see National Highways Statement of Common Ground). Relevant representation: National Highways.
10. Natural environment				
SAMM74	Paragraph 10.5: Landscape setting.	Text refers to the Exeter Landscape Sensitivity Assessment but does not specifically state that this only covers Exeter’s administrative boundary.	Amend text to read: ‘The Exeter Plan is supported by the Exeter Landscape Sensitivity Assessment which appraises open countryside within Exeter’s administrative boundary both around and within the urban area and around Exeter , including the Valley Parks.’	To provide clarity that the landscape sensitivity assessment only considers land within Exeter. Teignbridge District Council (TDC) supports the

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				suggested text change (see TDC SoCG). Relevant representation: TDC.
SAMM75	Paragraph 10.5: Landscape setting.	Text refers to the role landscape setting plays in providing the backdrop for key heritage assets but does not refer to the Exeter Skyline Study.	Amend text to read: 'The open land also performs a variety of other roles, including maintaining identity, providing a green rural backdrop for key heritage assets (the Exeter Skyline Study identifies some views of particular importance), enabling informal recreation and providing tranquil areas.'	To ensure there is reference to the Exeter Skyline Study. Historic England supports the suggested text change (see Historic England SoCG). Relevant representation: Historic England.
SAMM76	Paragraph 10.6: Landscape setting.	Text refers to the combination of roles that make the landscape valued but does not refer to the Valued Landscape Assessment.	Amend text to read: 'It is the combination of these roles, qualities and their importance to the local population which establishes this land as a distinctive and valued landscape requiring protection from inappropriate development (the Landscape Setting Areas - Valued Landscape Assessment provides additional analysis).'	To ensure there is reference to the Landscape Setting Areas - Valued Landscape Assessment.

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SAMM77	Paragraph 10.7: Landscape setting.	Text refers to the sensitive landscape setting areas but does not specifically state that the policy can only apply to Exeter's administrative area.	Amend text to read: 'These areas include the sensitive areas to the north and west of the city and the Valley Parks. Whilst the policy requirement can only apply to Exeter City Council's administrative area, However, landscape is a strategic issue that is important to the setting of the city and our neighbouring authorities are also encouraged to recognise this when considering development proposals on the edge of the city. -and protect Exeter's landscape setting.	To ensure it is clear the requirements of Policy NE1 only apply within Exeter's administrative boundary. TDC supports the suggested change (see TDC SoCG). Relevant representation: TDC.
SAMM78	Paragraph 10.8: Landscape setting.	Text refers transport infrastructure necessary to deliver allocated development but only references the Exeter Plan.	Amend text to read: 'Essential strategic infrastructure, such as energy or transport infrastructure necessary to deliver allocated development within Development Plans the Exeter Plan, may also be appropriate if it can be demonstrated that there is no suitable alternative site with less harmful impacts and that harm is minimised.'	To ensure that essential strategic infrastructure associated with allocated development is treated the same way, whichever administrative area it is located within. TDC supports the suggested change (see TDC SoCG).

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				Relevant representation: TDC.
SAMM79	Paragraph 10.10: Valley Parks.	Text explains that there is potential for the Clyst Valley Park to link to the wider Clyst Valley Regional Park but this could be worded more strongly.	Amend text to read: 'There is potential for this land to should link into the wider Clyst Valley Regional Park to the north...'	To clarify and strengthen this explanatory text. Relevant representation: Devon Countryside Access Forum.
SAMM80	Paragraph 10.18: Biodiversity.	Text identifies designations of biodiversity and geodiversity importance but does not reference the statutory protection afforded to SSSIs.	Amend text to read: 'Other areas of particular biodiversity and geodiversity importance include statutorily designated Sites Of Special Scientific Interest (SSSIs), and...'	To ensure the Plan references the statutory protection afforded to SSSIs. Relevant representation: RSPB.
SAMM81	Paragraph 10.21: Biodiversity.	Text refers to the biodiversity gain hierarchy but does not accurately explain how this applies.	Amend text to read: 'All development proposals will need to provide at least 10% measurable net gains in biodiversity, onsite where possible but elsewhere if not, in line with the biodiversity gain hierarchy . Biodiversity Net Gain (BNG) should be applied after all impacts on statutory designated wildlife sites and protected landscapes have been avoided, mitigated, or	To ensure appropriate description and explanation of the biodiversity net gain hierarchy. Natural England (NE) supports the suggested text change (see NE SoCG).

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			compensated for. mitigation hierarchy (which puts avoiding harm to biodiversity ahead of mitigating harm, with compensation as a last resort). The Biodiversity Net Gain (BNG) BNG requirement is set out in the 2021 Environment Act and is now a legal requirement.'	Relevant representation: NE.
SAMM82	Paragraph 10.22: Biodiversity.	Text refers to guidance on bat and bird box provision in the Residential Design Guide but does not refer to other available guidance.	Amend text to read: '...the Residential Design Guide Supplementary Planning Document provides helpful guidance, including for example, in relation to bat and bird box provision (guidance on bat and bird box provision is also provided by BS 42021:2022 and the Future Homes Hub's Homes for Nature Guidance Document').'	To reference additional guidance on bat and bird box provision. Relevant representation: RSPB
11. History and heritage				
SAMM83	Paragraph 11.3: Introduction.	Text explains the heritage-related evidence base but does not clearly identify the role of the views, heights and density work supporting the Plan.	Amend paragraph 11.3 and include additional paragraphs to read: '11.3 In addition to the HIA, a Views, Density and Heights Study has been prepared involving two stages of assessment. This The	To ensure clarity over the roles of two documents within the evidence base: the Skyline Study and the Sites and applied methodology report.

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			Exeter Skyline Study identifies key views, including views of and from heritage assets across the city and considers the potential development impact of the larger mixed-use brownfield allocations on these views and assets. This work relates to the capacity assessments for key allocations in the Plan, is referenced in the relevant allocation policies and should also be used to inform development proposals across the city, particularly major development proposals. Historic England have been a partner in producing this work. Exeter's most prominent heritage assets which are the priority for preservation and enhancement. It does not include all views but will be an important resource to inform development proposals and the assessment of their potential impact. Historic England was a key stakeholder on the Exeter Skyline Study and a wider group of stakeholders also contributed to the study.	Also to further strengthen an ongoing improvement to the wider heritage evidence informing planning activity in the city. Historic England supports the suggested text change (see Historic England Statement of Common Ground). Relevant representation: Historic England.

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			11.4 The Exeter Plan strategic allocations: Views, heights and capacity – applied methodology report has informed the capacity requirements for a series of the strategic allocations in the Exeter Plan in the context of the views included in the Exeter Skyline Study. It considers example scenarios of how development could come forward. In doing so, the Exeter Plan strategic allocations: Views, heights and capacity – applied methodology' work is designed to demonstrate the results of a possible application of the methodology and data gathering of the Exeter Skyline Study. The heights and density of any development proposal would be subject to all the provisions within the Exeter Plan including the preservation and enhancement of designated and non-designated heritage assets and townscape considerations. Detailed HIA or Townscape and Visual Impact Assessment (TVIA) will be required at masterplan or application stage depending on	

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			the scale and location of development. 11.5 In order to strengthen the ongoing evidence-base and policy for the historic environment, the City Council will publish a new Historic Buildings, Sites and Monuments Record System (HBSMR) in 2025 together with starting an audit of the key Conservation Area Appraisals and Management Plans. This will start in 2025 with Southernhay and the Friars and then the Central area.'	
SAMM84	Paragraph 11.7: Types of heritage asset.	Text explains the status of, and legislation regarding, heritage assets. However, some minor corrections are required.	Amend text to read: '...Registered Parks and g Gardens are designated heritage assets. Designated heritage assets are protected by law under legislation including the Planning (Listed Building & Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, provisions introduced by the Levelling Up and Regeneration Act (LURA) 2023 (when those are in force) and by Government	To provide greater accuracy regarding the legislation relating to heritage considerations and designations. Historic England supports the suggested text change (see Historic England SoCG). Relevant representation:

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			policy in the NPPF.	Historic England.
SAMM85	Paragraph 11.20: Development affecting heritage assets.	Text refers to the need for planning applications to be supported by a heritage statement, however a heritage impact assessment is considered appropriate terminology.	Amend text to read: 'All planning applications affecting heritage assets or their settings must include a Heritage Statement / Heritage Impact Assessment proportionately describing the significance...'	To provide greater accuracy regarding the appropriate documents to be submitted with a planning application. Historic England supports the suggested text change (see Historic England SoCG). Relevant representation: Historic England.
SAMM86	Paragraph 11.38: Archaeology.	Text explains the potential need to preserve archaeology in situ, but does not identify the links between brownfield development, the re-use of buildings and the benefits of re-using foundations in terms of archaeological impact.	Amend text to read: '...maintained within their original context. On sites where there is significant archaeology, consideration should also be given to the re-use of buildings or their foundations as a means of limiting impacts. However, when this preservation in situ is not feasible or appropriate...'	To explore in more detail the potential impact of development and benefits of re-use of buildings in terms of minimising archaeological impact. Historic England supports the suggested text

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				change (see Historic England SoCG). Relevant representation: Historic England.
SAMM87	Paragraphs 11.41, 11.42 and 11.43: Heritage assets and climate change.	Policy HH1 currently covers heritage assets more widely as opposed to historic buildings specifically. This needs amendment as set out in SMM70 and associated amendments are needed to the supporting text. Also, greater emphasis is needed on the specific characteristics of historic buildings which could mean that different measures are required to those employed on more modern buildings when improving energy efficiency etc.	Amend text to read: ‘11.41 In order to safeguard our heritage assets historic buildings and to sustain our cultural heritage...’ ‘...the priority to conserve heritage assets them. Given the number of heritage assets historic buildings in Exeter it is vital that they play a role in both climate change mitigation and adaptation.’ ‘11.42 Addressing and adapting to climate change may require alterations to historic buildings which affect the building fabric or development that affects heritage assets, including their settings...’ ‘...A holistic view , ‘whole building approach’ should be taken when	To better reflect the policy's focus on historic buildings as opposed to the wider historic environment. To acknowledge more clearly the characteristics of historic buildings in the context of measures to mitigate and adapt to climate change. Historic England supports the suggested text change (see Historic England SoCG). Relevant representation: Historic England

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			considering such alterations. This should balance the need to safeguard the future of the asset historic building and its conservation...' '11.43 When adapting and retrofitting historic buildings for climate change, different approaches are needed to those for buildings of modern construction. These specific approaches help to avoid maladaptation . Historic England offers information...'	
SAMM88	Paragraphs 11.44 – 11.45: Conserving and enhancing the Exeter City Walls.	Amendments are required to more appropriately reflect the designation of most of the Walls as a Scheduled Monument, associated legislation and the need to protect the Walls from harm due to their presence on the Heritage at Risk Register. The policy number also needs to be corrected to HH5 in paragraph 11.47.	Amend text to read: '11.44 The Exeter City Walls are largely designated as a Scheduled Monument, legally protected due to their national historical importance by the Ancient Monuments and Archaeological Areas Act. Parts of the Walls not designated as a Scheduled Monument are likely to have equal significance and will be treated as having equal importance as part of the greater asset. The Walls are also protected under the Exeter City	To ensure the supporting text more appropriately reflects the legislation and designation of the City Walls and the need to protect them in the context of their place on the Heritage Risk Register. Historic England supports the suggested text change (see Historic

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			Council Act 1987 which introduces powers to the Local Authority to survey and, if necessary, repair the fabric of the Walls outside its ownership which is in a poor state of repair, and to recover the costs of doing so. The Act also prohibits the placing of any structure within 2 meters of the Walls, unless this has gained consent as part of a Planning Application or is a necessary function of a statutory undertaker' 11.45 Around 70% of the circuit remains intact, delineating the origin of the city. The Walls became subsumed by modernity as the city expanded and faced twentieth century transport infrastructure and development demands. The challenge lies in re-energising and re-imagining the significance of the Walls and all they symbolise into a sustainable future city and to celebrate the individuality of the inherited city. The presence of the Walls on the national Heritage at Risk Register highlights their vulnerability and priority for	England Statement of Common Ground). Relevant representation: Historic England

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			safeguarding. The Scheduled Monument designation offers the Walls a high degree of protection, both through the planning process and the parallel consenting process for Scheduled Monuments.'	
SAMM89	Paragraph 11.47: Conserving and enhancing the Exeter City Walls.	Text refers to the wrong policy number: HH3 instead of HH5.	Amend text to read: 'Policy HH 3 ⁵ recognises the importance of the Walls Scheduled Monument to Exeter and sets out how development will be required to respond se-to this .'	To correct an editorial error.
Culture and tourism				
SAMM90	Paragraph 12.24: Development and cultural provision.	Policy C2 sets out the requirement for large scale development proposals to be accompanied by a Cultural Plan but does not explain the aim or content of this document.	Add a paragraph after paragraph 12.24 to read: '12.25 To ensure cultural impact and provision is considered, large scale development proposals are required to be accompanied by a Cultural Plan. This requirement will be applied proportionately based on the nature, scale and context of the development, including in terms of its proximity to cultural assets and any potential impact on, or provision/loss of cultural facilities.'	To provide clarity regarding the need for and content of a Cultural Plan Relevant representations: Various.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			The Cultural Plan should set out how cultural opportunities will be integrated into the development and reflect the outcomes of early community engagement and a clear understanding of the local area's identity. It should outline deliverable actions, such as support for creative workspaces, cultural programming, or high-quality public spaces, proportionate to the development and secured through the planning process.'	
12. High quality places and design				
SAMM91	Paragraph 13.9: Design principles.	Text refers to the 'Viewpoints, Density and Heights Study'. This has been renamed for clarity as the 'Exeter Skyline Study' and this needs to be reflected in the text.	Amend text to read: '...The Viewpoints, Density and Heights Study Exeter Skyline Study should be referred to in preparing proposals for development...'	To refer to the updated name for a key piece of evidence. Historic England supports the suggested text change (see Historic England SoCG). Relevant representation: Historic England.
13. Health and wellbeing				

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
No suggested additional modifications.				
14. Infrastructure and facilities				
SAMM92	Paragraph 15.4: Infrastructure planning and delivery.	Text incorrectly refers to Highways England as opposed to National Highways.	Amend third bullet point of paragraph 15.4 to read: 'Highways England' National Highways: Transportation'.	To include the correct name of the organisation. National Highways supports the suggested modification (see National Highways SoCG). Relevant representation: National highways.
SAMM93	Paragraph 15.15: Viability.	Main modifications SMM82, SMM83 and SMM84 are suggested to Policy IF2 concerning the circumstances in which the City Council will consider it justifiable to reconsider viability at the planning application stage. Minor modifications to the supporting text will ensure consistency.	Amend text to read: 'Policy IF2 explains the approach that will be taken to considering the viability of development. It has been developed in accordance with paragraph 58 of the NPPF; the assumption is that policy compliant development will be viable at planning application stage unless it can be demonstrated otherwise by the applicant through a thorough and	To provide clarity, flexibility, and clearer alignment with the approach set out in the NPPF and PPG. Relevant representation: Various.

Suggested Additional Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			publicly available viability assessment. It does however recognise that, after the adoption of the Exeter Plan, circumstances could change so significantly that viability may be affected, leading to potential discussions about whether development can afford to fund the infrastructure or affordable housing as required by Plan policies. Planning Practice Guidance is clear that it is for the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage, and the City Council will only agree to consider viability at application stage if sufficient justification exists .	
SAMM94	Paragraph 15.16: Viability.	Main modifications SMM82, SMM83 and SMM84 are suggested to Policy IF2 concerning the circumstances in which the City Council will consider it justifiable to reconsider viability at the planning application stage. Minor modifications to the supporting text will ensure consistency.	Amend text to read: 'The policy provides examples of indicates potential viability changes which may be considered reasonable in discussions over what infrastructure and affordable housing could be provided by the development. The price paid for land is not a relevant justification	To provide clarity, flexibility, and clearer alignment with the approach set out in the NPPF and PPG. Relevant representation: Various

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			for failing to accord with relevant policies in the plan, as policy requirements and site-specific costs (including abnormal costs) should be accounted for when land transactions are agreed. Under these circumstances, Where the City Council agrees with the justification put forward by the applicant, a developer may submit a new assessment of development viability which indicates that a revised approach to the development of the site may be reasonable. This process will need to be carefully justified and comprehensive evidence of viability changes will need to be provided. The policy sets out a proposed viability review mechanism which will help to deliver the policy requirements post-decision later in the Plan period, even if they are not provided initially. The City Council will take account of site specific factors and the reasons for the viability shortfall when determining whether and how best to require viability review.	
SAMM95	Paragraph 15.18: Community	Text describes the types of	Amend text to read:	To broaden the types

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	facilities.	needs that are met by the range of services and facilities in Exeter, and lists examples of types of facilities that Policies IF3 and IF4 seek to protect.	‘Exeter has a wealth of services and facilities that are essential for the health, welfare, safety , social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, healthcare, public-facing police facilities , community halls, places of worship, pubs, libraries, space for children’s services/community use and youth clubs. The protection of these facilities is of critical importance to our residents’.	of services and facilities listed as examples in the supporting text, and to clarify that public-facing services that help ensure the safety of the community are also covered by the policy. Relevant representation: Devon and Cornwall Police.
SAMM96	Paragraph 15.19: Community facilities.	Text explains the intent and approach of Policy IF3 to protecting community facilities. Paragraph 15.19 refers to viability, however paragraph 15.20 then explains in more detail that viability will only be considered in relation to community facilities provided as commercial operations run by the private sector. SMM85 is suggested to Policy IF3, and the supporting text	Amend text to read: ‘The planning system has an important role to play in the protection of existing community facilities. Policy IF3 clearly sets out the expectation that community facilities will be protected unless a number of criteria can be met regarding the suitability, viability , condition and requirement for the facility...’	To avoid the potential for misunderstanding regarding how and when viability will be a consideration in relation to community facilities in Policy IF3. Viability will remain as a consideration, as explained in paragraph 15.20.

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		needs to be consistent with this.		
SAMM97	Paragraph 15.19: Community facilities.	SMM85 is suggested to the criteria in Policy IF3, and the supporting text needs to be consistent with this.	Amend text to read: ‘...for the facility. The policy also seeks to ensure that, where there is no reasonable prospect of an existing facility continuing, opportunities to deliver an appropriate alternative community use are fully explored. Robust evidence will be required to justify any potential loss of provision.’	To clarify the intent of the policy.
SMM98	Paragraph 15.20: Community facilities.	The words “for sale” are unnecessarily duplicated in the text.	Amendtext to read: ‘... Where relevant, applications which would result in the loss of a privately run business serving an important community function (e.g. a pub) will be expected to be supported by evidence which demonstrates that the existing facility is no longer viable and that the sale of the business has been marketed for sale for a period of at least twelve months in advance of the submission of the planning application ...’	To correct an editorial error.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
SAMM99	Paragraph 15.24: Community facilities.	Text refers to education as a 'particularly important' community facility. It would be more appropriate to describe education facilities as 'essential'.	Amend text to read: 'Education is a particularly important an essential form of community facility..'	To reflect the importance of education facilities. Devon County Council (DCC) supports the suggested modification (see DCC SoCG). Relevant representation: DCC.
SAMM100	Paragraph 15.25: Community facilities.	Text describes education infrastructure needs over the plan period and mentions the potential need for a second additional primary school, but does not note that a site for a second school is not identified the Exeter Plan.	Amend text to read: '15.25 Additional early years, primary, secondary and special education provision will be required during the plan period, including a new primary school at Water Lane. The provision of a new primary school will be central to the delivery of high-quality development and the creation of a community at Water Lane. The school shall comply with Department for Education's area guidelines for mainstream schools: Building Bulletin 103, or any successor document, in the context of site constraints and	To provide greater clarity regarding the approach that will be taken with respect to the potential need for a second additional primary school during the plan period. Devon County Council (DCC) supports the suggested modification (see DCC SoCG). Relevant representation: DCC.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			proposed higher density development in the area.' Add new paragraph. '15.26 A second additional primary school is also likely to be required to meet the remaining projected need for primary school places towards the end of the plan period. It should be noted that a site has not been included in the plan. As addressed by the Regulation 19 East Devon Local Plan, there is the potential for a new primary school within an allocation adjacent to the city boundary to accommodate pupils from Exeter. However, should any development come forward, prior to a new primary site being provided at such a time in the plan period where the additional places are required, this shortfall in school places will be taken into consideration when determining any relevant planning application. The City Council will continue to work with Devon County Council on delivering this as appropriate suitable education provision. An	

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			ongoing review of the need for education provision in the context of types of housing will be undertaken alongside Devon County Council as part of a wider, future review of the Exeter Plan'.	
SAMM101	Heading: Open space, sport, play areas and allotments.	The order of facilities in the heading is different to that in the policy heading.	Amend heading to read: 'Open space, sport , play areas and allotments and sport '	To match the section title with the policy title.
SAMM102	New paragraph 15.28: Open space, sport, play areas and allotments.	This section of the Plan introduces the type of facilities present in the city but does not explain how they will be protected.	Add an additional paragraph after paragraph 15.28 to read: '15.29 As with community facilities, the planning system has an important role to play in the protection of existing open space, play areas, allotments and sport. Policy IF4 clearly sets out the expectation that these facilities and areas will be protected unless a number of criteria can be met. Robust evidence will be needed to justify any potential loss. The policy also enables alternative provision subject to that being made to a timescale that avoids any significant break in use. Generally, the City Council will seek to ensure that there is no break, however there may be	To clarify the protection of open space, play areas, allotments and sport including in the context of alternative provision. Relevant representations: Sport England.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			occasions when a short break could be appropriate in the context of the wider benefits which the new provision will bring'.	
15. Site allocations				
SAMM103	Paragraph 16.1: Introduction.	Text refers to a Plan period of 2021 and 2041. SMM1 suggests modifying the Plan period to 2022 to 2042.	Amend text to read: 'The Exeter Plan allocates a series of sites for development between 2021 2022 and 2041 2042.'	To ensure text reflects SMM1. Relevant representation: South West Housing Association Planning Consortium.
SAMM104	Paragraph 16.2: Introduction.	Text refers to the Third Edition HELAA, whereas it should refer to the latest (Fourth) Edition.	Amend text to read: '...The assessment, which is contained in the Exeter Housing and Economic Land Availability Assessment Third Fourth Edition (HELAA), look at:...	To ensure the latest edition of the HELAA is referenced, as this contains the most up to date assessment of potential site allocations.
SAMM105	Paragraph 16.7: Residential allocations.	Text states that thirty-three sites are allocated in Policy H2. However, suggested modifications SMM20, SMM26 and SMM27 will mean that Policy H2 allocates thirty sites.	Amend text to read: ' Thirty-three sites are allocated for predominantly residential or residential development in Policy H2...	To ensure text reflects SMM20, SMM26 and SMM27. Relevant representations: Environment Agency and Murleigh Retail.
SAMM106	Map of allocations: Site allocations (page 36).	Map of allocations shows Belle Isle, Belle Drive (site ref. 72),	Amend the Map of allocations by deleting sites 72, 60 and 110.	To ensure the Map of allocations reflects

Suggested Additional Modification reference (SMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		Land at Hamlin Lane (site ref. 60) and 88 Honiton Road (site ref. 110). However, SMM20, SMM26 and SMM27 suggest that these sites are deleted from the list of allocated sites in Policy H2.		SMM20, SMM26 and SMM27. Relevant representations: Environment Agency and Murleigh Retail.
SAMM107	Map of allocations: Site allocations (page 36).	Depiction of Hessary, Hollow Lane (site ref. 108) should be updated to reflect new evidence of land availability referred to in the Exeter 2025 HELAA – 4 th Edition.	Amend Map of allocations by amending the site boundary of site 108 to reflect new availability evidence.	To ensure the Map of allocations reflects new evidence of land availability.
SAMM108	Paragraph 16.12: Strategic mixed use brownfield allocation: SBA1 – Water Lane.	As identified by representations made in connection with Policies SBA2 and SBA3, the text for strategic allocations would benefit from acknowledgement that the site has potential to deliver a range of housing types.	Amend text to read: ‘...Water Lane provides a great opportunity to deliver a high quality, low-car new neighbourhood with a range of housing types (for example, homes for families, older people and students) , that is well served by a primary school...’	To acknowledge that the site has the potential to deliver a range of housing types. Relevant representations: Chex Developments Limited C/O Zinc RE UK Limited, Morgan Real Estate and University of Exeter.
SAMM109	Paragraph 16.13: Strategic mixed use brownfield allocation: SBA1 – Water Lane	Text would benefit from giving additional profile to the importance of delivering a primary school at Water Lane.	Add an additional paragraph after paragraph 16.12 to read:	To give additional profile to the importance of delivering a primary

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			'The provision of a new primary school will be central to the delivery of high-quality development and the creation of a community at Water Lane. The school should comply with Department for Education Building Bulletin Guidance for Schools (BB103) in the context of site constraints and proposed higher density development in the area.'	school at Water Lane. Devon County Council (DCC) supports the suggested text (see DCC SoCG). Relevant representation: DCC.
SAMM110	Paragraph 16.14: Strategic mixed use brownfield allocation: SBA1 – Water Lane.	Text refers to the status of planning applications correct at the time of Plan Publication. The status has since progressed. Text should also clarify that the homes proposed in the planning applications are included in the housing capacities specified in Policies H2 and SBA1.	Amend text to read: 'The site is currently in multiple ownerships, including areas owned by the City Council. 341 1,563 of the total homes identified at Water Lane already benefit from a resolutions to approve planning consent, subject to the completion of a Section 106 Agreements (under planning applications references 22/1145/FUL and 23/1007/OUT). These homes are not included in the housing capacity specified in policies SBA1 and H2. An outline planning application for mixed use redevelopment of another part of the site is pending consideration.	To ensure the text reflects the latest status of planning applications and how they are accounted for in Policies H2 and SBA1.

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SAMM111	Paragraph 16.15: Strategic mixed use brownfield allocation: SBA1 – Water Lane.	Policy SBA1: Water Lane includes a requirement for an extra care housing facility. The text does not consider how this will be delivered.	Add an additional paragraph after 16.15 to read: 'The City Council is working proactively with landowners, stakeholders, Homes England and ATLAS to deliver policy requirements for Water Lane including flood risk infrastructure, utilities, transport, education, community facilities, green infrastructure and extra care housing. This is progressing through site delivery work'.	To demonstrate the delivery of an extra care housing scheme at Water Lane. Devon County Council supports the suggested text (see DCC SoCG). Relevant representation: Devon County Council.
SAMM112	Paragraph 16.16: Strategic mixed use brownfield allocation: SBA2 – East Gate.	Text refers to the former bus station and former Pyramids Leisure Centre. These buildings have been demolished since Plan Publication.	Amend text to read: '...It currently contains a variety of uses including office, business and retail, residential, public car parking, and the sites of the former bus station and former Pyramids Leisure Centre.'	To ensure the text reflects current land uses on the site.
SAMM113	Paragraph 16.17: Strategic mixed use brownfield allocation: SBA2 – East Gate.	As identified by representations made in connection with Policies SBA2 and SBA3, the text for strategic allocations would benefit from acknowledgement that the site has potential to	Amend text to read: 'East Gate provides a great opportunity to regenerate a tired area of the city into a high quality, low or no-car new neighbourhood that is includes a range of	To acknowledge that the site has the potential to deliver a range of housing types. Relevant representations:

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		deliver a range of housing types.	housing types (for example, homes for families, older people and students), well served by the wide range of services, employment and facilities offered by its central location...	Chex Developments Limited C/O Zinc RE UK Limited, Morgan Real Estate and University of Exeter.
SAMM114	Paragraph 16.22: Strategic mixed use brownfield allocation: SBA3 – Red Cow.	As identified by representations made in connection with Policies SBA2 and SBA3, the text for strategic allocations would benefit from acknowledgement that the site has potential to deliver a range of housing types.	Amend text to read: '...As a strategic transport hub, the site is well suited to deliver a low carbon, low-car neighbourhood that optimises density and includes a range of housing types (for example, homes for families, older peoples and students). In order to...'	To acknowledge that the site has the potential to deliver a range of housing tenures. Relevant representations: Chex Developments Limited C/O Zinc RE UK Limited, Morgan Real Estate and University of Exeter.
SAMM115	Paragraph 16.22: Strategic mixed use brownfield allocation: SBA3 – Red Cow.	Text refers to operational needs and responding to challenges but does not refer to the use of the level crossing or to the adjacent active freight yard.	Amend text to read: 'The development must meet St David's railway station's operational needs (including use of the level crossing and the retention of current provision levels of car parking), as well as responding to challenges such as flood risk, contamination, noise and vibration from adjacent uses, in particular the active freight	To ensure the operational needs of the railway station are met and the challenges associated with adjacent uses are highlighted. Relevant representation: Blocwork.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			yard, and protecting of the amenities of nearby residents.'	
SAMM116	Paragraph 16.25: Strategic mixed use brownfield allocation: SBA4 – Exe Bridges Retail Park.	As identified by representations made in connection with Policies SBA2 and SBA3, the text for strategic allocations would benefit from acknowledgement that the site has potential to deliver a range of housing types.	Amend text to read: 'The site provides an opportunity to redevelop the area for a range of housing types (for example, homes for families, older people and students), whilst retaining significant retail provision in a mixed use proposal.'	To acknowledge that the site has the potential to deliver a range of housing types. Relevant representation: Chex Developments Limited C/O Zinc RE UK Limited, Morgan Real Estate and University of Exeter.
SAMM117	Paragraph 16.27: Strategic mixed use brownfield allocation: SBA4 – Exe Bridges Retail Park.	Text currently refers to retail on the ground floor and residential above.	Amend text to read: 'Key considerations at Exe Bridges Retail Park will be the need to maintain the retail function of the site on the ground floor (the site is within the St Thomas district centre) whilst also providing significant, high quality residential development above '.	To provide greater flexibility for future development on the site. Relevant representation: NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd
SAMM118	Paragraph 16.29: Strategic mixed use brownfield allocation: SBA5 – South Gate.	As identified by representations made in connection with Policies SBA2 and SBA3, the text for	Amend text to read: 'The site provides a great opportunity to significantly enhance the appearance of this	To acknowledge that the site has the potential to deliver a range of housing types.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		strategic allocations would benefit from acknowledgement that the site has potential to deliver a range of housing types.	key gateway to the city centre, provide a range of housing types (for example, homes for families, older peoples and students), improve active travel links between the city centre...	Relevant representation: Chex Developments Limited C/O Zinc RE UK Limited, Morgan Real Estate and University of Exeter.
SAMM119	Paragraph 16.35: Topsham infrastructure delivery framework.	The Plan currently identifies one new primary school site. This text currently explains that additional primary school capacity to meet some of the needs of Exeter could be provided north of Topsham in East Devon. However, it does not refer to the potential to review the education needs assessment work in future.	Include additional text at the end of paragraph 16.35 to read: 'In terms of school provision, an ongoing review of the need for education provision in the context of types of housing will be undertaken alongside Devon County Council as part of a wider, future review of the Exeter Plan'.	To ensure that ongoing assessment work is undertaken to ensure that sufficient education capacity is available in future. Devon County Council supports the suggested modification (see DCC Statement of Common Ground). Relevant representation: Devon County Council.
16. Monitoring and implementation				
SAMM120	Climate change: CC8: Flood risk.	It is not clear that the monitoring indicator relates to Environment Agency objections.	Amend Indicator to read:	To provide clarity.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			'Number of applications permitted contrary to Environment Agency advice objections'.	
SAMM121	Homes: H1: Housing requirement.	'Council delivering own housing stock' is identified as a delivery mechanism. It is not clear that this is the City Council.	Amend Delivery Mechanisms to read: 'City Council delivering own housing stock'.	To provide clarity.
SAMM122	Homes: H4: Affordable housing.	There are no indicators or targets for measuring total annual affordable homes (including affordable private rent delivered on Build to rent schemes) permitted and completed.	Amend heading to read: 'H4: Affordable housing and H5: Build to rent' Amend Indicator to read: '...0.5 hectares or more. Number of additional affordable homes (including affordable private rent) permitted per annum Number of additional affordable homes (including affordable private rent) completed per annum' Amend Target to read: '...affordable homeownership.	To ensure effective monitoring of all affordable housing, including affordable homes secured outside the Section 106 process. Relevant representation: Exeter Green Party.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Additional affordable homes (including affordable private rent) permitted Additional affordable homes (including affordable private rent) completed	
SAMM123	Homes: H4: Affordable housing.	'Council delivering own housing stock' is identified as a delivery mechanism. It is not clear that this is the City Council.	Amend Delivery Mechanisms to read: 'City Council delivering own housing stock'.	To provide clarity.
SAMM124	Homes: H14: Accessible homes.	There is no indicator to allow measurement of total new build homes built to Building Regulations M4(3) (wheelchair user homes) standard.	Amend Indicator to read: '...(wheelchair user homes) standard. Number of new build homes built to Building Regulations M4(3) (wheelchair user homes) standard' Amend Delivery Mechanisms to read: • 'The Exeter Plan • Planning applications • Council delivering own housing stock • Collaboration with developers	To ensure effective monitoring of new build homes built to Building Regulations M4(3) standard. Relevant representation: Exeter Green Party.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Collaboration with Homes England'	
SAMM125	Economy and jobs: EJ6: New transformational employment allocations.	Monitoring indicator needs updating to reflect suggested modifications to policy wording (SMM52 and SMM55).	Amend heading to read: 'EJ6: New transformational employment allocations'. Amend Indicator to read: 'Amount of additional transformational employment floorspace...'	To be consistent with suggested modifications to Policy EJ6.
SAMM126	History and heritage: HH1: Conserving and enhancing heritage assets.	It is not clear that the monitoring Indicator relates to Historic England objections.	Amend Indicator to read: 'Number of applications permitted contrary to Historic England advice objections'. 'Target: No applications permitted contrary to Historic England advice. Zero'.	To provide clarity. Relevant representation: Historic England.
SAMM127	Housing trajectory	The trajectory reflects data correct at the time of Plan Publication. The data has been updated, as per the 2025 Exeter Plan Housing Trajectory.	See appendix C.	To ensure the Housing trajectory in the Plan reflects data in the 2025 Exeter Plan Housing trajectory.
17. Other				
SAMM128	Glossary	Glossary was not included within the Regulation 19	Include amended glossary in the Exeter Plan document.	To provide greater clarity.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
		Exeter Plan but was published separately.		
SAMM129	Glossary	No definition of a 'cluster flat'	Add definition to read: 'A form of purpose-built communal housing comprising private ensuite bedrooms and shared living / dining space.'	To provide greater clarity.
SAMM130	Glossary	Definition of Gypsy and Traveller is incomplete in terms of the Government's 2023 Planning Policy for Traveller Sites.	Amend definition to read: 'For planning purposes, the Government's 2023 Planning Policy for Traveller Sites defines Gypsies and Travellers as persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. It includes English, Scottish, Welsh and Romany Gypsies, Irish Travellers, New (Age) Travellers, and Travelling Showpeople. However, for ease, the Exeter	To provide clarity and completeness. Relevant representations: Exeter Green Party, TravellerSpace.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			Plan solely refers to Gypsies and Travellers.'	
SAMM131	Glossary	No definition of a 'knowledge economy'	Add definition to read: 'A knowledge economy is where the production of goods and services is primarily based on knowledge intensive activities, emphasising innovation and human capital. It is driven by technology and ideas with less reliance on physical and natural resources.'	To provide greater clarity.
SAMM132	Glossary	Definition of 'Large scale residential development' is unclear.	Amend definition to read: 'Developments with which include 100 or more homes, 200+ student or co-living bed spaces, or a combination, subject to detailed planning and infrastructure considerations.'	To clarify that mixed use developments are 'large scale residential developments' where they include, amongst other forms of development, 100 or more homes, 200+ student or co-living bed spaces, or a combination.
SAMM133	Glossary	No definition of 'landscape-led scheme'.	Add definition to read: 'A landscape-led scheme is a development approach that prioritises the existing landscape'	To provide greater clarity.

Suggested Additional Modification reference (SAMM)	Element of the plan (policy or paragraph)	Issue with Regulation 19 Publication Plan content	Suggested modification	Justification
			and its natural features when designing new places.'	
SAMM134	Glossary	No definition of 'place specific solutions'	Add definition to read: 'Place-specific solutions focus on creating development solutions tailored to the unique needs and circumstances of the location. This approach involves understanding the local context to design development that is sustainable, resilient and beneficial for the community.'	To provide greater clarity.
SAMM135	Glossary	No definition of 'net zero'.	Add definition to read: 'Net Zero means reducing greenhouse gas emissions as much as practically possible, with residual emissions being absorbed and durably stored by nature and other carbon dioxide removal measures, leaving zero in the atmosphere'.	To provide greater clarity.
SAMM136	Glossary	No definition of 'wheeling'.	Add definition to read: 'Wheeled mobilities using manual, self or assisted propelled mobility aids and wheelchairs.'	To provide greater clarity.

Appendix A: Policy HH1

SMM70: Composite suggested main modifications of Policy HH1: Conserving heritage assets

~~Exeter's iconic and ancient heritage will continue to make an essential contribution to the liveability, culture, economy and tourism offer of the city.~~

Development proposals will be required to conserve and where appropriate enhance Exeter's rich heritage and ~~to~~ ensure that development makes a positive contribution to the historic environment and the cultural offering and identity of the city. All largescale development proposals will be required to improve access to, and interpretation of, the historic environment.

Development proposals that ~~would~~ affect designated ~~or non-designated~~ heritage assets and/or their settings will ~~only~~ be supported when they conserve and, where appropriate, enhance or reveal, the significance of the asset in the form of fabric, settings, character or appearance, and any features of special architectural, historic or archaeological interest.

Development proposals that would result in ~~substantial~~ harm to, ~~or loss of~~, a designated heritage asset, ~~including Listed Buildings~~ will not be permitted unless there is clear and demonstrable justification that they are necessary to achieve ~~substantial~~ public benefits that outweigh the harm ~~or loss~~. ~~Where they development proposals would result in substantial harm to, or loss of, a designated asset, they will not be permitted unless there is clear and demonstrable justification that they are essential to achieve substantial public benefits that outweigh the harm less than substantial harm to the significance of a designated heritage asset, the public benefits must demonstrably justify and outweigh the harm or loss.~~

~~Development proposals should avoid or minimise harm to the significance of non-designated heritage assets including those on the List of Buildings of Local Importance. Development proposals that~~ Where they would result in substantial harm to ~~the significance of~~ a non-designated heritage asset, including those on the List Of Buildings of Local Importance, ~~they~~ will only be supported if the public benefits ~~clearly~~ outweigh the harm.

~~Development proposals should seek to conserve and enhance important views according to their contribution to heritage significance and townscape value and should be informed by the Exeter Skyline Study where appropriate.~~

~~Development proposals that would ensure the repair and maintenance of assets on the Heritage at Risk Register will be supported. Planning obligations may be used in these circumstances.~~

Development proposals ~~that would result in harm to~~ affecting heritage assets ~~must be accompanied by a Heritage Statement / Heritage Impact Assessment. Where they development proposals would result in harm to heritage assets they~~ will be required to be accompanied by an appropriate mitigation strategy agreed upon by the City Council.

Appendix B: Employment need and supply

SAMM50: Composite suggested additional modification showing the employment need and supply position.

	East Devon	Exeter	Mid Devon	Teignbridge	Total
Total need (office and industrial) – middle of range	72	71	52	60	255
Total supply (office and industrial)	178	21	50	100	349

Appendix C: Housing trajectory

SAMM127: Composite suggested additional modifications to the Housing trajectory (page 166 of the Submission Exeter Plan).

Site	Yield in the five years to Plan adoption (2021/22 2022/23 to 2025/26 2027/28)	Yields yrs 1-5	Yields yrs 6-10	Years Yield yrs 11-15	Total
Completions and sites with planning consent / resolution to approve consent at 1 April 2024 2025					
Various	4164 3,519	2552 2,427	758 981	126 448	7600 7,375
Windfalls					
Various	38 0	288 234	340 829	340 935	1006 1,998
Strategic mixed use brownfield sites					
Water Lane	0	0	1231 259	630 495	1861 754
East Gate	0	0 202	595 475	14	609 691
Red Cow/ St Davids	0	0	425 294	17 99	442 393
Exe Bridges Retail Park	0	0	0	201	201
South Gate	0	0	81	0	81
Predominantly residential sites: large scale					
Land at Old Rydon Lane	0	0	357 225	0 132	357
St Bridget Nurseries	0	0	225	125	350
Heavitree Road Police Station	0	0 813	225 0	125 0	350 813
Mary Arches Mutli-Storey and Surface Car Park	0	0	154 225	0 21	154 246
Whipton Community Hospital	0	0	110 129	0	110 129
Predominantly residential sites: major					
Rougemont Switching Centre	0	0	86	0	86

Exeter Plan

Schedule of suggested modifications For submission

Land at Newcourt Road, Topsham	0	0	69 51	0	69 -51
Land adjoining Silverlands	0	0 55	67 0	0	67 55
Land to the west of Newcourt Road, Topsham	0	0	56	0	56
Land at Topsham Golf Academy	0	0 54	54 0	0	54
Land at Exeter Squash Club	0	0	48	0	48
Land and buildings at Victoria Street	0	0	47	0	47
12-31 Sidwell Street	0	0	45	0	45
Land to the east of Newcourt Road 2, Topsham	0	0 27	45 0	0	45 27
Belle Isle Depot	0	0	40	0	40
Clifford Close	0	0	33	0	33
Gipsy Hill Hotel	0	0	28 -41	0	28 -41
Unit 1 Nightclub, Summerland Street	0	0	28	0	28
Land behind 66 Chudleigh Road	0	0	27	0	27
Chestnut Avenue	0	0	24	0	24
East of Pinn Lane	0	0	24 -12	0	24 -12
Land at Matford Lane (2)	0	0	21 27	0	21 27
Hessary, Hollow Lane	0	0	18	0	18
Fever and Boutique, 12 Mary Arches Street	0	0	15	0	15
Land south of Gipsy Hill Lane	0	0	14	0	14
Land at Hamlin Lane	0	0	13	0	13
Garages at Lower Wear Road	0	0	12	0	12
88 Honiton Road	0	0	10	0	10

Residential sites: minor					
Newbery Car Breakers	0	0	8	0	8
Lancelot Road	0	0	7	0	7
Land rear of Beacon Lane shops	0	0	6	0	6
Land at Taunton Close	0	0	5	0	5
91-97 Wonford Street	0	0	5	0	5
TOTAL	4,202 3,519	2,840 3,812	5,355 4,318	1,578 2,470	13,975 14,119