

Exeter Plan

Statement of Common Ground

Exeter City Council and Devon County Council

September 2025

Version 5

Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN



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1.0 Introduction

- 1.1. Exeter City Council (the City Council) have been preparing the Exeter Plan since late 2020. The plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 1.2. Following the end of the publication process in February 2025 representations have been compiled and attention has turned to addressing the issues raised in the representations.
- 1.3. Devon County Council provided a series of representations or comments to the Regulation 19 Plan. These are considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Devon County Council have cooperated on strategic matters and that the plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph of the National Planning Policy Framework¹. The document assists in presenting evidence that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It is also part of the evidence required to demonstrate compliance with the Duty to Cooperate.
- 1.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance² and meets the requirements of the Planning and Compulsory Purchase Act 2004³ and the Localism Act 2011⁴.
- 1.6. The detailed comments from Devon County Council are considered in Exeter Plan chapter order in this Statement of Common Ground. However, as an over arching comment, the County Council representation stated the following:

‘Overall, Devon County Council views the plan to be sound, legally compliant and to comply with the duty to cooperate. The county council continues to be broadly supportive of the emerging Exeter Plan: Publication Plan. The county council has been in ongoing discussions with Exeter City Council with regard to strategic issues relating to infrastructure provision, transport, education, children’s

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

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

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

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

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

and adult services, mineral and waste planning, economy, flood risk, historic environment, public health and community facilities. This positive and proactive approach has addressed a number of issues prior to reaching this stage of the plan'.

- 1.7. This demonstrates that there has been joint working between Exeter City Council and Devon County Council since the outset of plan-making.

2.0 Joint Strategy: Our shared coordinates

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

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

3.0 Strategic matters: Spatial strategy

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 3.5 No representations were raised by Devon County Council regarding the spatial strategy at Regulation 19 Publication stage.

4.0 Strategic matters: Climate change

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 4.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to climate change. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 4.4 No representations were raised by Devon County Council regarding climate change at Regulation 19 Publication stage.
- 4.5 Devon County Council did however state that in relation to various topics, including flood risk (which is in the climate change chapter of the Exeter Plan), that 'matters relating to the above issues have been addressed and the county council has no further comments to

make'. On this basis, as Lead Local Flood Authority Devon County Council, has not raised any soundness concerns regarding the approach to flood risk, access and egress or the Strategic Flood Risk Assessments accompanying the plan. In the case of the Strategic Flood Risk Assessments and access and egress evidence, Devon County Council was involved in the scoping of the evidence required and informed evidence preparation as the Exeter Plan progressed.

5.0 Strategic matters: Homes

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 5.3 Significant joint working has taken place between the City Council and Devon County Council in the preparation of the Exeter Plan. For housing this covered the topics of homes for older people, supported living and gypsy and traveller accommodation. This included jointly drafting the policies and supporting text for Policy H8: Homes for older people and Policy H9: Supported housing and providing comment on other sections in advance of consultation, particularly regarding Policy H11: Gypsy and Traveller accommodation. Regular monthly meetings were held with between the City Council and Devon County Council throughout 2024 supplemented by additional meetings as required on particular topics.
- 5.4 The Regulation 19 representation from Devon County Council provided a small number of housing-related comments covering the following main issues:
- Adult social care including extra care housing; and
 - Gypsy and traveller accommodation including the gypsy and traveller accommodation assessment and the lack of an allocation for gypsy and traveller pitches.
- 5.5 Since the Regulation 19 consultation discussions have continued with Devon County Council. Three-weekly meetings have continued with a specific discussion on these matters held on 3 March 2025. This has resulted in some of the matters raised in representations being addressed.
- 5.6 As overarching comments relating to housing, the County Council made the following statements in their representation in relation to adult social care and Gypsy and Traveller accommodation:

Adult social care

'The inclusion of extra care housing and affordable specialist provision is imperative within the Plan policies. Therefore, we support Policy H8 'Homes for older people' and Policy H9 'Supported housing'. As Marsh Barton is no longer proposed as a strategic site allocation, only one out of the two required extra care housing schemes remains identified within the Publication Plan site allocation policies (Water Lane Strategic Policy SBA1). Without another identified extra care housing scheme, there is uncertainty over whether sufficient extra care housing provision can be delivered in Exeter. Therefore, we consider that there is still a need to identify extra care housing provision within another site allocation. As stated in Appendix 1, we recommend that allocation SBA2 – East Gate is the most

suitable site allocation due to its size and proximity to facilities as supported by Policy H8 but also recognise that alternative locations may come forward which can meet the criteria of Policy H8’.

Gypsy and Traveller provision

‘It is the role of the Local Planning Authority to plan to meet the needs of Gypsy, Traveller, and Travelling Showpeople communities across Exeter. The county council has some concerns regarding the absence of allocated Gypsy and Traveller provision within the Plan, particularly when considering under delivery in previous plan cycles within Exeter.

Due to a lack of development sites coming forward, the Plan does not seek to allocate any sites for Gypsy and Traveller provision and instead will rely on these sites coming forward as windfall sites. The county council has concerns regarding the likelihood of windfall sites for this Gypsy and Traveller provision coming forward without allocation and encourages Exeter City Council to reassess whether there are any appropriate sites within the city or any proposed allocations which could include this provision. Should a site not be identified for allocation for the required pitches as identified through the assessment, we consider it unlikely that there will be any provision made within this plan cycle.

Whilst it is understood that the Plan is being examined under transitional arrangements and therefore the December 2023 Version of the NPPF applies, it should be noted that the Gypsy and Traveller definition has been changed in the most recent version of the Government’s Planning policy for traveller sites (PPTS) (12 December 2024) resulting in what has previously been defined as non-PPTS need now being included within the definition. This, in addition to provisions made within the new NPPF for the use of Greenbelt land for Gypsy and Traveller provision, demonstrates the direction of travel with regard to ensuring the delivery of Gypsy and Traveller provision in the future and the increased emphasis on the need for delivery of pitches.

Devon County Council has had discussions with TravellerSpace who will be responding to this consultation by way of technical challenge to the methodology used in the needs assessment. The county council is supportive of this challenge and recognises the importance of ensuring a robust assessment has been undertaken’.

- 5.7 The detailed representations related to housing are discussed in the following table.
- 5.8 It should be noted that where representations have been provided on housing matters (for example regarding extra care housing provision) at a particular allocation, these are addressed in this Statement of Common Ground in the section which considers the allocation in question.

Issue	Element of the plan (policy or paragraph)	DCC's representation	ECC comment	DCC's comment	Final position and suggested plan modification
Adult social care	Paragraph 6.46	We request that this paragraph 6.46 identifies extra care housing as an example of a 'relevant, specialist home' type in order to recognise the importance of location for these specific users. We request that the wording in bold is added: "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."	Agreed. Amendment to be made as suggested.	DCC welcomes the City Council's response and agreement to amend the supporting text as requested.	Amend paragraph 6.46 as follows: '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.'

Adult social care	Paragraph 6.48	The paragraph refers to “annex 8” of the Government’s Supported Housing: National Statement of Expectations. We consider that this reference is incorrect and should refer to “Annex A” instead.	Agreed. Amendment to be made as suggested.	DCC welcomes City Council’s response and agreement to amend the supporting text as requested.	Amend paragraph 6.48 as follows: ‘Homes for older people should adhere to the accommodation standards in annex 8 Annex A of the Government’s Supported Housing: National Statement of Expectations’.
Adult social care	Paragraph 6.52	The paragraph refers to “annex 8” of the Government’s Supported Housing: National Statement of Expectations. We consider that this reference is incorrect and should refer to “Annex A” instead.	Agreed. Amendment to be made as suggested.	DCC welcomes the City Council’s response and agreement to amend the supporting text as requested.	Amend paragraph 6.52 as follows: ‘Homes for older people should adhere to the accommodation standards in annex 8 Annex A of the Government’s Supported Housing: National Statement of Expectations’.
Gypsy and Traveller accommodation	Paragraph 6.65	This paragraph states that “Policy H11 aims to facilitate the provision of accommodation for Gypsies, Travellers and Travelling Showpeople...” but we would question the level of certainty provided in relying on windfall sites coming forward to provide this accommodation.	ECC considers that as the requirement for gypsy and traveller pitches is only a maximum of 1 during the plan period, relying on windfalls is an appropriate mechanism for delivery. Potential sites for pitches have been reviewed since the Regulation 19 consultation with no sites	DCC acknowledges that the plan recognises “...a need for five permanent pitches for households who do not meet the planning definition and one pitch for a household whose status is undetermined” and the expectation “...that they will be met through	Add a new paragraph at the end of the Gypsy and Traveller accommodation section after paragraph 6.69 which states: ‘A review of the need for, and delivery of, gypsy and traveller accommodation will be undertaken as part of a

			being considered appropriate or deliverable. A topic paper is currently being prepared to address the issue of gypsy and traveller pitches. ECC does not consider that modifications are required.	windfall development.” Whilst DCC no longer maintains the points made in the council’s Regulation 19 response on this matter there remains a concern that a reliance on the delivery of Gypsy, Roma and Traveller pitches via windfall sites does not offer the same level of certainty that allocating a specific site within the plan would. This concern could be addressed through additional wording being added to the supporting statement of the ‘Gypsy and Traveller accommodation’ section of the plan (paragraphs 6.65-6.69) to indicate that a re-assessment of need will be undertaken as part of the 5 year review of the local plan as well as through the monitoring and implementation framework for the Exeter Plan.	wider future plan review in the context of the monitoring and implementation framework of the Exeter Plan and any potential updates to national planning policy’.
Gypsy and Traveller	Policy H11: Gypsy and	Due to a lack of development sites coming	ECC considers that as the requirement for gypsy and	DCC acknowledges that the plan recognises “...a	Add a new paragraph at the end of the Gypsy and

accommodation	Traveller accommodation	forward, the Plan does not seek to allocate any sites for Gypsy and Traveller provision and instead will rely on these sites coming forward as windfall sites. The county council has concerns regarding the likelihood of windfall sites for this Gypsy and Traveller provision coming forward without allocation and encourages the city council to reassess whether there are any appropriate sites within the city or any proposed allocations which could include this provision.	traveller pitches is only a maximum of 1 during the plan period, relying on windfalls is an appropriate mechanism for delivery. Potential sites for pitches have been reviewed since the Regulation 19 consultation with no sites being considered appropriate or deliverable. A topic paper is currently being prepared which will consider ECC's decision-making record on applications for gypsy and traveller pitches.	need for five permanent pitches for households who do not meet the planning definition and one pitch for a household whose status is undetermined" and the expectation "...that they will be met through windfall development." Whilst DCC no longer maintains the points made in the council's Regulation 19 response on this matter there remains concern that a reliance on the delivery of Gypsy, Roma and Traveller pitches via windfall sites does not offer the same level of certainty that allocating a specific site within the plan would. This concern could be addressed through additional wording being added to the supporting statement of the 'Gypsy and Traveller accommodation' section of the plan (paragraphs 6.65-6.69) to indicate that a re-assessment of need will be undertaken as part	Traveller accommodation section after paragraph 6.69 which states: '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 any potential updates to national planning policy'.
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				of the 5 year review of the local plan as well as through the monitoring and implementation framework for the Exeter Plan.	
Gypsy and Traveller accommodation	National planning policy transitional arrangements	Whilst it is understood that the Plan is being examined under transitional arrangements and therefore the December 2023 Version of the NPPF applies, it should be noted that the Gypsy and Traveller definition has been changed in the most recent version of the Government's Planning policy for traveller sites (PPTS) (12 December 2024) resulting in what has previously been defined as non-PPTS need now being included within the definition. This, in addition to provisions made within the new NPPF for the use of Greenbelt land for Gypsy and Traveller provision, demonstrates the direction of travel with regard to ensuring the delivery of Gypsy and Traveller provision in the future and the increased emphasis on the need for	As discussed with DCC, ECC agrees that the Exeter Plan is being prepared under transitional arrangements for national planning policy and that the December 2023 versions of the National Planning Policy Framework and Planning Policy for Traveller Sites apply. This has implications for the number of households which need to be planned for. The Exeter Plan makes provision for this need. ECC does not consider that modifications are required.	DCC notes Exeter City Council's Gypsy and Traveller Accommodation Topic Paper dated May 2025 and accepts that the 2023 version of the Planning Policy for Traveller Sites applies. DCC also acknowledges that the plan recognises "...a need for five permanent pitches for households who do not meet the planning definition and one pitch for a household whose status is undetermined" and the expectation "...that they will be met through windfall development."	No modifications required.

		delivery of pitches.			
Gypsy and Traveller accommodation	Evidence: Exeter Gypsy and Traveller Accommodation Assessment	Devon County Council has had discussions with TravellerSpace who will be responding to this consultation by way of technical challenge to the methodology used in the needs assessment. The county council is supportive of this challenge and recognises the importance of ensuring a robust assessment has been undertaken.	ECC considers that the GTAA has been prepared by nationally renowned consultants in accordance with national guidance in the context of the December 2023 versions of the National Planning Policy Framework and Planning Policy for Traveller Sites. Having sought explanation from DCC regarding their concerns over the GTAA methodology, no further clarification has been provided. ECC does not consider that modifications are required.	DCC notes Exeter City Council's Gypsy and Traveller Accommodation Topic Paper dated May 2025 and accepts that the 2023 version of the Planning Policy for Traveller Sites applies. DCC also acknowledges that the plan recognises "...a need for five permanent pitches for households who do not meet the planning definition and one pitch for a household whose status is undetermined" and the expectation "...that they will be met through windfall development."	No modifications required.

6.0 Strategic matters: Economy and jobs

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 6.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to the economy and jobs. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 6.4 No representations were raised by Devon County Council regarding the economy and jobs chapter at the Regulation 19 Publication stage.
- 6.5 Devon County Council did however state that in relation to various topics, including economy that ‘matters relating to the above issues have been addressed and the county council has no further comments to make’.

7.0 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 7.3 Devon County Council provided supportive comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to the retail and centres chapter of the Exeter Plan.
- 7.4 No representations were raised by Devon County Council regarding retail and the future of our centres at Regulation 19 Publication stage.

8.0 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 8.3 No specific representations were made by Devon County Council regarding the policies or supporting text in the sustainable transport chapter of the Exeter Plan at Regulation 19 Publication stage.
- 8.4 However, the following comment was made which expresses overall support for the overall content of the chapter:

‘Over the course of the plan process, Devon County Council has been in broad agreement with the content of the transport element of the plan and ongoing discussions have led to changes enabling further alignment with the county council’s vision’.

‘Overall, Devon County Council supports Exeter City Council’s vision for sustainable transport, aiming to minimise car use while promoting active travel and public transport. This aligns with several of Devon County Council’s strategies, including the emerging Local Transport Plan 4. Our goal is to provide an integrated, accessible transport system where walking, cycling, and public transport are the most attractive forms of local travel, enabling at least 50% of Exeter trips to be wheeled, walked, or cycled to work or education by 2040’.

‘A key aspiration of the county council is to maximise the opportunities in development planning to utilise road space effectively, bringing about broader improvements in sustainable mobility and placemaking and providing opportunities to contribute towards the delivery of the Local Cycling and Walking Infrastructure Plan (LCWIP) routes. We consider that the Exeter Plan appropriately supports and links to Exeter’s LCWIP strategy’.

- 8.5 This does not make specific suggestions for modifications to Plan content and so none are proposed in relation to these comments. No representations were provided by Devon County Council at Regulation 19 stage relating to the soundness of the Exeter Plan in terms of highways and transportation.
- 8.6 Devon County Council support for the overarching approach to the transport elements of the Exeter Plan has resulted from the significant and ongoing work which has taken between the County and City Councils. This has included:
- Monthly meetings in 2024 and 2025;
 - Joint policy and supporting text drafting;
 - Liaison to ensure consistency between the Exeter Plan and the adopted Exeter Local Cycling and Walking Infrastructure Plan and the emerging Devon and Torbay Local Transport Plan 4; and
 - Significant strategic traffic modelling covering the wider subregion of Exeter, East Devon, Mid Devon and Teignbridge involving Devon County Council and National Highways.
- 8.7 Devon County Council did comment on the content of the Infrastructure Delivery Plan in relation to transportation. These comments are addressed later in this document in the evidence base section. These are not considered to be a soundness issue.
- 8.8 National Highways did provide representations on the Exeter Plan. Potential suggested revisions to the Exeter Plan suggested by National Highways the City Council would be comfortable with have been discussed with Devon County Council.

9.0 Strategic matters: Natural environment

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 9.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to the natural environment. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 9.4 No representations were raised by Devon County Council regarding the natural environment chapter at the Regulation 19 Publication stage.

10.0 Strategic matters: History and heritage

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 10.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to history and heritage. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 10.4 No detailed representations were raised by Devon County Council regarding the history and heritage chapter at the Regulation 19 Publication stage.
- 10.5 Devon County Council did however state that in relation to various topics, including the historic environment, that 'matters relating to the above issues have been addressed and the county council has no further comments to make'.

11.0 Strategic matters: Culture and tourism

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 11.3 Devon County Council provided some minimal comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to culture and tourism. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 11.4 No representations were raised by Devon County Council regarding the culture and tourism chapter at the Regulation 19 Publication stage.

12.0 Strategic matters: High quality places and design

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 12.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to high quality places and design. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 12.4 No representations were raised by Devon County Council regarding the high-quality places and design chapter at the Regulation 19 Publication stage.

13.0 Strategic matters: Health and wellbeing

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 13.3 Devon County Council provided comments to the previous Full Draft Plan Regulation 18 version of the Exeter Plan in relation to health and wellbeing. These matters have been addressed through discussions between the City and County Council in the preparation of the Regulation 19 Exeter Plan.
- 13.4 No representations were raised by Devon County Council regarding the health and wellbeing chapter at the Regulation 19 Publication stage.
- 13.5 Devon County Council did however state that in relation to various topics, including public health, that ‘matters relating to the above issues have been addressed and the county council has no further comments to make’.

14.0 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 14.3 Infrastructure and facilities are wide-ranging and cover various infrastructure types. In general terms relating to overall infrastructure provision, the Devon County Council response made the following comment:

‘Devon County Council considers it essential that infrastructure necessary to support the development proposed in the Local Plan is provided in an appropriately phased and timely manner. It is also essential that appropriate funding mechanisms to deliver this infrastructure are in place, in particular to ensure necessary education, transport and community infrastructure is provided. We look forward to continuing our work with Exeter City Council on the Infrastructure Delivery Plan’.

- 14.4 No modifications are considered as required in relation to this comment.

14.5 There are various other types of infrastructure subjects on which Devon County Council did not comment in detail. No specific representations were raised regarding the following:

- Infrastructure provision;
- Children's and adult services; and
- Minerals and waste.

14.6 The Devon County Council response states that '...matters relating to the above issues have been addressed and the county council has no further comments to make'.

14.7 In terms of education provision, significant joint working has taken place between the City Council and Devon County Council in the preparation of the Exeter Plan. This included regular monthly meetings between the City Council and Devon County Council throughout 2024 supplemented by additional meetings as required to discuss the Infrastructure Delivery Plan, potential school sites, requirements relating to SBA1: Water Lane and amended policy drafting.

14.8 Various detailed representations were provided by Devon County Council in relation to education provision. The Devon County Council response made the following comment relating to local education provision, including early years:

'The county council has a statutory duty to ensure that there is sufficient school and early years places for pupils across the county, including ensuring that the impacts of development are mitigated through existing or new school place provision'.

'Overall we support the city council's commitment in paragraph 15.24 to supporting the principle of development providing early years, primary, secondary and provision for children with Special Educational Needs and Disabilities (SEND) through Section 106 Agreement contributions as may be required and in line with the County Council's Education Infrastructure Plan and Education Infrastructure s106 Approach and the Department for Education Guidance on Securing Developer Contributions for Education'.

'An additional 1,000 primary school places will be required through the delivery of two new primary schools and expansion of an existing school. All new primary provision will include early years provision. Whilst Policy SBA1 specifies provision of a two form entry school at Water Lane, Devon County Council requests that a site of at least 1.6ha is allocated for this purpose. We acknowledge that the need for the remaining primary school places would be towards the end of the plan period and consider a second new primary school is required through the allocation of an additional school site within the Exeter administrative boundary. As a site has not yet been identified, DCC requests that wording is added within the plan stating a second new primary school is required over the plan period. DCC also recognises that there are emerging plans to

allocate sites directly adjacent to the city, but outside its administrative boundary, which could provide a strategic solution to partially mitigate the impact of the Local Plan. We note that this is reflected in Policy TI1 of this plan’.

‘If the Local Plan is unable to allocate a site for a second new primary school, the county council may require conditions to be placed on the delivery of houses until such time that a solution is found or a future review of the need suggests that this site may not be required. Without this, it may not be possible to mitigate the education impact of development’.

‘In regards to secondary provision, an additional 1,200 places will be required over the plan period. Our expectation is that the needs of the Local Plan can be mitigated through the expansion of existing secondary schools and without the allocation of a new secondary school site’.

‘Regarding Special Education Needs, DCC will be seeking financial contributions towards provision within and outside the city rather than allocation/ delivery of a new SEND school within the Exeter Local Plan, recognising that Special Schools serve a much wider geographical area’.

‘Paragraph 15.24 is noted and welcomed with regards to funding of educational infrastructure provision’.

14.9 These comments were followed by more specific comments on particular parts of the plan which are detailed in the following table.

14.10 Since the Regulation 19 consultation discussions have continued between the City Council and Devon County Council. Three-weekly meetings have continued with a specific discussion on education provision on these matters held on 7 April 2025. This has resulted in some of the matters raised in representations being addressed.

14.11A series of detailed comments were made to the education elements of the Infrastructure Delivery Plan. These are addressed later in this document in the evidence section.

Issue	Element of the plan	DCC's representation	ECC comment	DCC's comment	Final position
Education	Paragraph 15.24	Paragraph 15.24 states that "Education is a particularly important form of community facility." DCC requests that paragraph 15.24 includes the additional wording shown in bold below to recognise the essential role educational infrastructure plays within the community: "Education is an essential form of community facility."	Agreed. Amendment to be made as suggested.	DCC welcomes the City Council's response and agreement to amend the supporting text within paragraph 15.24 as requested.	Amend paragraph 15.24 as follows: 'Education is a particularly important an essential form of community facility'.
Education	Paragraph 15.24	We welcome the wording within paragraph 15.24 which ensures that the required education infrastructure as a result of development is funded with S106 contributions (rather than through CIL).	ECC notes this comment. No amendment is required.	No further comments necessary.	No modifications required.

Education	Paragraph 15.25	An additional 1,000 primary school places will be required through the delivery of two new primary schools and expansion of an existing school. DCC supports provision of a two form entry school at Water Lane. Whilst the second new primary school will be required to meet projected need towards the end of the plan period, no site has been allocated within the administrative boundary of Exeter. DCC requests that paragraph 15.25 includes the additional wording shown in bold below to recognise the potential issue related the lack of an allocated site for a second primary school, accord with Government guidance on school design (currently Building Bulletin 103) and identify how development should be considered prior to a site being identified: "Additional early years, primary, secondary and special education provision will be required during the plan period, including a new primary school at	ECC understands the importance of schools in terms of education but also their role in terms of community cohesion. However, ECC does not consider it necessary to specify the site area requirements for the primary school at Water Lane or elsewhere in the city due to the land availability constraints and the potential to provide for primary schools on smaller sites than 1.6ha. ECC also considers that it is not yet clear if a second new primary school will be required towards the end of the plan period as a result of the type of dwelling types which are envisaged to come forward in the city and uncertainty regarding their likelihood of accommodating families. ECC therefore suggests additions to paragraph 15.25 as follows: 'Additional early years, primary, secondary and special education provision will be required during the	DCC largely welcomes ECC's proposed additional wording to paragraph 15.25 and acknowledges the difficulty in specifying school site size within policy and supporting text. It is therefore suggested that the following wording is incorporated into para 15.25 (after the first sentence) in order to ensure compliance with DfE BB103 guidelines: "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 proposed higher density development in the area."	Include additional text in paragraph 15.25 as follows: '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 proposed higher density development in the area. Include new paragraph. 'A second additional primary school is also likely to be required to meet the remaining
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		Water Lane on a site of at least 1.6ha. A second additional primary school on a site of least 1.6ha 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 allocated as no suitable/ acceptable sites have been identified within the administrative boundary of Exeter. Should any development come forward, prior to a new primary site being identified but 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 work with Devon County Council on delivering suitable education provision.” If Exeter City Council is not able to commit to a second primary school site and/or one has not	plan period, including a new primary school at Water Lane. 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 suitable education provision.’	A reduced size and constrained site is expected to increase the cost of delivery for the school. S106 contributions will fund the new school places, with S106 rates set as per DfE Guidance. DCC needs to ensure that site options are affordable and brought forward in a timely manner to ensure new school provision is delivered to align with the development needs. If site options are not affordable DCC will not be able to deliver the new provision and mitigate the education impact of the proposed development. DCC has a statutory duty to ensure sufficient school places are available. DCC has reduced the pupil ask to 85% of the expected pupil yield which is based upon 20 years of pupil data within Exeter and shows that on average 15% of children will attend other schools (i.e. private, grammar, special	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 ongoing review of the need for education provision in the context of types of housing will be
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		come forward when required, DCC may potentially need to request the use of Grampian conditions should there be insufficient primary school places at the time of any proposal, to ensure that sufficient school places are provided to facilitate housing development as it comes forward.		or elective home education). DCC has liaised with Exeter City Council to ensure that any new proposals for PBSA, Co-Living, or Sheltered accommodation is further discounted from the calculations and only family-type dwellings are included in forecasts, resulting in what is considered to be a robust approach which avoids over-forecasting pupil numbers. Taking these reductions into account, the 1,000 new primary school places would preferably be delivered over the plan period through the allocation and delivery of 2 new primary schools (420 places each) and 1 existing school expansion (210 places) within Exeter City Council's administrative boundary and would not rely on provision within a neighbouring local plan as is being proposed at	undertaken alongside Devon County Council as part of a wider, future review of the Exeter Plan'.
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				the north of Topsham site. If, as is suggested by ECC, a second primary school site cannot be allocated within the city boundaries and the north of Topsham site is to be relied upon to deliver some of the necessary school places, DCC reserves the right to utilise appropriate planning measures to ensure all necessary educational infrastructure is in place prior to any development commencing/ being occupied. Without the allocation of an additional 420 place second primary school site within the city boundary and reliance on the north of Topsham site to fulfil these needs by delivering 260 school places for Exeter pupils, DCC calculates that there will be a shortfall of approximately 110 places of the overall 1,000 new primary places required.	
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				DCC also seeks a commitment from ECC to review all housing types, coming forward every 5-years, to ensure DCC can effectively assess future pupil need and ensure that the necessary school infrastructure is appropriately allocated and delivered for the timely delivery of new school places.	
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15.0 Site allocations

Broad summary of chapter content

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 15.5 Significant joint working has taken place between the City Council and Devon County Council in the preparation of the Exeter Plan. For the site allocations this included feeding expert advice into the HELAA, infrastructure planning and the policy drafting for the strategic mixed use brownfield allocations.
- 15.6 The Regulation 19 representation from Devon County Council provided a series of comments covering the following strategic mixed use brownfield allocations:
- SBA1: Water Lane;
 - SBA2: East Gate; and
 - TI1: Topsham infrastructure delivery framework.

15.7 Since the Regulation 19 consultation discussions have continued with Devon County Council. Three-weekly meetings have continued. This has resulted in some of the matters raised in representations to be addressed.

15.8 The representations related to housing are discussed in the following table.

Issue	Element of the plan (policy or paragraph)	DCC's representation	ECC comment	DCC's comment	Final position
Adult social care	Policy SBA1: Water Lane. A. iv.	The pending application 23/1007/OUT at the Water Lane site, proposing between 900-980 homes, does not identify any Extra Care Housing provision. As a result there is uncertainty about whether the necessary extra care housing will be delivered at Water Lane with the remaining land yet to come forward and the requirement of Policy SBA1 being met. We have made further comments associated with this issue about the East Gate policy below.	Application 23/1007/OUT has resolution to grant status following a committee decision in February 2025. Although the application does not include an extra care housing element, large other areas of the allocation are yet to come forward and therefore it is anticipated that an extra care housing scheme will be delivered within the wider allocation. This is a requirement of policy SBA1 and the accompanying adopted Liveable Water Lane SPD. ECC is working proactively with landowners and Homes England to deliver policy requirements for Water	DCC welcomes the proposed modification to include an additional supporting statement paragraph numbered 16.16. The county council also notes the contents of Section F (Homes for older people) of the housing topic paper and supports the proactive approach being undertaken to ensure that extra care housing is delivered at Water Lane in accordance with the policy.	Include an additional paragraph 16.16 as follows: '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'.

			Lane, including an extra care housing scheme. This is progressing through a site delivery strategy. Suggested modification to add an additional paragraph 16.16: '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'.		
Education	Policy SBA1. Water Lane C. vii.	Further to our comments above relating to paragraph 15.25 we request that additional wording, as shown in bold below, is added to part C. vii to ensure that the policy allocates a school site large enough to comply with current Government guidance (Building Bulletin 103): "vii. A 2 form entry primary school including early	ECC does not consider it necessary to specify the site area requirements for the primary school. Policy SBA1 specifically requires provision to be made for a two-form entry primary school at Water Lane. This is supported by the Liveable Water Lane SPD. Specifying the site area is considered to be inflexible given the restricted land availability in the area. A	DCC needs to ensure that site options are affordable and deliverable. A reduced size and constrained site is expected to increase the cost of delivery for the school. S106 contributions will fund the new school places, with S106 rates set as per DfE Guidance. If site options are not affordable DCC will not be able to	Include additional text in policy SBA1, part Cvii, together with separating out the requirement for secondary school and SEND contributions, as follows: 'vii. A two form entry primary school including early years and communal space for a family hub that shall

		years and communal space for a family hub on a site of at least 1.6 ha and contributions to secondary and special educational needs provision”	study in the evidence for the Exeter Plan (the Water Lane Primary School Options Appraisal) demonstrates how a two-form entry primary school could be delivered on a site smaller than 1.6ha. ECC does not consider that modifications are required.	deliver the new provision and mitigate the education impact of the proposed development. DCC accepts the difficulty in specifying the site area requirements for the primary school site at Water Lane and requests that additional wording, as shown in bold below, is added to part C. vii of Policy SBA1 to ensure that the policy allocates a school site large enough to comply with current Government guidance (Building Bulletin 103): “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 and contributions to secondary and special educational needs provision”	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. Contributions to secondary and special educational needs provision’.
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Adult social care	Policy SBA2: East Gate	As Marsh Barton has since been removed as a site allocation, only one out of the two required extra care housing schemes remains identified within the Publication Plan site allocation policies (Water Lane Strategic Policy SBA1). Without another identified extra care housing scheme, there is uncertainty over whether sufficient extra care housing provision can be delivered in Exeter and we think that there is still a need to identify extra care housing provision within another site allocation. We consider that the East Gate allocation represents a suitable site for Extra Care Housing due to its size and proximity to facilities which is supported by Policy H8 but recognise this may not necessarily be the preferred option for the site owners. We would however continue to encourage alternative sites being investigated which meet the requirements of Policy H8: Homes for older	ECC does not consider it necessary to specify the need for a second additional extra care housing scheme within the East Gate allocation because this scheme is coming forward at the former Clifton Hill Leisure Centre site (now demolished). The site is currently owned by ECC who has formally resolved to dispose of the site to a developer for a 100% affordable extra care housing scheme via an Executive decision in May 2025. Pre-application discussions have also started for this scheme.	DCC accepts the city council's response in this SOCG relating to Policy SBA2 and does not request any change to Policy SBA2. DCC notes the contents of Section F (Homes for older people) of the housing topic paper. DCC also welcomes the decision of the ECC Executive Committee on Tuesday 20th May 2025 with regards to Item 8: Disposal report seeking authority to dispose of the former Clifton Hill Leisure Centre and its sale conditional upon planning approval being granted for the delivery of 100% Affordable Rent Extra Care housing scheme for older people. DCC expects that the Clifton Hill site will provide a positive opportunity to deliver another extra care housing scheme within the city.	No modifications required.
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		people and in particular H8.b where the proposal is "...well connected to local shops, services and community and support facilities, including health facilities and public transport;"			
Education	Paragraphs 16.34 and 16.35 re Topsham infrastructure	Paragraph 16.34 refers to the expected East Devon Local Plan allocation of an adjacent primary school site that could also serve Exeter children. Devon County Council seeks a primary school site within the Exeter boundary and allocated in the Exeter Local Plan in preference to reliance on provision within a neighbouring Local Plan to provide certainty of its delivery. The emerging East Devon Local Plan Regulation 19 consultation is due to commence in February 2025, but examination and adoption are likely to be later than for the Exeter Plan. It is therefore afforded some degree of planning weight but lacks certainty at this stage when considering educational place provision in Exeter. Should Exeter	ECC considers that the methodology used to calculate the pupil generation from future development in the city at plan-making stage is a conservative estimate (i.e. the top end of a range) because it assumes that all housing units will be of a size and type to generate children. The methodology diverges from this approach at planning application stage. Given the city development strategy relies on a variety of homes coming forward, including flats, it is not considered that all the homes planned will generate children. On this basis, it is not clear whether a second new primary school will be required or when. ECC and DCC have worked to identify a second new	DCC has a statutory duty to ensure sufficient school places are available. DCC has reduced the pupil ask to 85% of the expected pupil yield which is based upon 20 years of pupil data within Exeter and shows that on average 15% of children will attend other schools (i.e. private, grammar, special or elective home education). DCC has liaised with Exeter City Council to ensure that any new proposals for PBSA, Co-Living, or Sheltered accommodation is further discounted from the calculations and only family-type dwellings are included in forecasts, resulting in what is considered to be a robust approach which avoids	Include additional text at the end of paragraph 16.35 as follows: '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'.

		City Council not be able to commit to a second primary school site and/or one has not come forward when required, DCC may potentially need to request that Grampian planning conditions are utilised should there be insufficient primary school places at the time of determining relevant planning applications.	primary school but have been unable to do so given the constrained, urban nature of the city. Discussions with East Devon District Council have shown they are willing to accommodate a school adjacent to Exeter/Topsham within a draft allocation sufficient to accommodate pupils from the city if required. ECC is content to include reference to the need for a review of pupils and education provision as part of a future Local Plan review.	over-forecasting pupil numbers. Taking these reductions into account, the 1,000 new primary school places would preferably be delivered over the plan period through the allocation and delivery of 2 new primary schools (420 places each) and 1 existing school expansion (210 places) within Exeter City Council's administrative boundary and would not rely on provision within a neighbouring local plan as is being proposed at the north of Topsham site. If, as is suggested by ECC, a second primary school site cannot be allocated within the city boundaries and the north of Topsham site is to be relied upon to deliver some of the necessary school places, DCC reserves the right to utilise appropriate planning measures to ensure all necessary	
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				educational infrastructure is in place prior to any development commencing/ being occupied. Without the allocation of an additional 420 place second primary school site within the city boundary and reliance on the north of Topsham site to fulfil these needs by delivering 260 school places for Exeter pupils, DCC calculates that there will be a shortfall of approximately 110 places of the overall 1000 new primary places required. DCC also seeks a commitment from ECC to review all housing types coming forward every 5-years, to ensure DCC can effectively assess future pupil need and ensure that the necessary school infrastructure is appropriately allocated and delivered for the timely delivery of new school places.	
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Education	Policy T11: A Topsham Infrastructure Delivery Framework	The wording within this policy needs to include reference (as it has with other policy allocations) to specify “ Contributions to early years, primary, secondary and special educational needs provision. ” At present it only refers to primary education.	ECC is of the view that it would be appropriate for the policy to specifically include reference to the full range of education provision as suggested. Policy IF3 already includes reference to the need for education contributions and so this specific reference is not required here and does not fit within the structure of the policy. Suggested modification to Policy T11: Part A as follows: ‘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...’	DCC welcomes the suggested modification to Policy T11 which appropriately incorporates DCC’s proposed wording specifying contributions for the delivery of early years, primary, secondary and special educational needs provision.	Include additional text to policy T11 Part A as follows: ‘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...’
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16.0 Evidence: Infrastructure Delivery Plan (December 2024 version)

Broad summary of the Infrastructure Delivery Plan

- 16.1 The Exeter Plan is accompanied by a significant evidence base which covers its various chapters.
- 16.2 One of the supporting evidence documents is the Infrastructure Delivery Plan (IDP). The second iteration of this was made available during the consultation on the Regulation 19 Exeter Plan (the December 2024 version of the IDP).
- 16.3 The IDP is a living document and has been produced following ongoing discussions with a series of infrastructure providers since 2023. Regular monthly discussions were held with Devon County Council during this period.

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 16.4 Devon County Council confirmed in the representation letter to the Regulation 19 Exeter Plan that there were no issues of soundness raised, however there were various detailed comments made on the IDP. These are addressed in the tables below. Separate tables are provided for different types of infrastructure – transportation and education.

Transportation

- 16.5 The comments on the IDP relating to transportation are addressed in the table below. Some additional revisions were agreed between the City and County Councils at a meeting on 24 March 2025. These were not raised in the Devon County Council response to the plan but are included in the table.
- 16.6 As already mentioned, discussions are ongoing between the City Council, Devon County Council, National Highways, East Devon District Council, Mid Devon District Council and Teignbridge on a sub-regional, strategic traffic modelling project to consider and address the overall impact of local plan development across the four districts. The position informed by this work is also addressed in the table.

Issue	IDP entry	Organisation's representation	ECC comment	DCC's comment	Final position and suggested plan modification
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Park and ride/mobility hubs	Wording change (column1): DCC requests that this project description is amended to refer to Park and Change to reflect the evolving nature of park and ride facilities which now facilitate other methods of sustainable onward travel.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: 'A series of Park and Change Ride/mobility hubs for key corridors into the city and key development sites, including: A30/Honiton road, A376/A3052/Sidmouth Road, Pinhoe Road, Cowley Bridge Road, West Exeter/Alphington Road, Bridge Road/Matford and strategic brownfield allocations'
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Shared mobility schemes	Classification amendment (Column 3): We welcome the inclusion of this scheme in the IDP but recognise that it is currently an aspirational scheme and as result recommend amending the	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Amend classification to C. Desirable.

		classification from B. Important to C. Desirable.			
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Long distance trails	Additional wording (Column 1): Devon County Council requests that the additional wording highlighted in bold in Column 1 is included to clarify that Cranbrook to Mosshayne is a walking and cycling route and recognise the role of green lanes as referred to in the LTP4, Exeter Transport Strategy and LCWIP.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Strategic long distance trails (beyond Exeter): Staged delivery of Clyst Valley Trail, Boniface Trail, Exe Estuary Trail, Cranbrook to Mosshayne (East Devon) walking and cycling route and exploring the creation of green lanes on the edge of Exeter.
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Local cycling and walking infrastructure plan	New wording (Column 1): Devon County Council requests the wording is changed to that shown in bold in Column 1 to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4): We request the cost is changed to align with the proposed changes in	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Exeter Local Cycling and Walking Infrastructure Plan: Top ten ranking schemes: E9, E3, E1, E15, E6, E14 (including replacement Mallison Bridge), E4, E7, E12, E20 (E3, E4, E9, E12—prioritised by DCC in first

		Column 1.			five years of LCWIP) Exeter Local Cycling and Walking Infrastructure Plan: Initial 5 Year Plan Routes (E3, E4, E6, E9, E12) Mallison bridge Amend IDP cost as suggested: £30,775,000 £20,000,000
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Local cycling and walking infrastructure plan	New wording (Column 1): We request the wording is changed to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4): Request the cost is changed to align with the proposed changes in Column 1.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Exeter Local Cycling and Walking Infrastructure Plan: Other routes linking to allocations: E13, E18, E19, E21, E22 Exeter Local Cycling and Walking Infrastructure Plan: Improvements to existing routes (E1, E10, E16, E17) Amend IDP cost as suggested: £7,200,000

					£10,000,000
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Local cycling and walking infrastructure plan	New wording (Column 1): We request the wording is changed to reflect/ be consistent with LTP4 ranking and LCWIP prioritisation. Cost change (Column 4): Request the cost is changed to align with the proposed changes in Column 1. Post Regulation 19 discussion: Amend rating from 'desirable' to 'important'.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Exeter Local Cycling and Walking Infrastructure Plan: Remaining schemes: E5, E8, E10, E16, E17 Exeter Local Cycling and Walking Infrastructure Plan: Proposed new cycling routes between key residential, employment and leisure destinations across the city (E5, E7, E8, E13, E14, E15, E18, E19, E20, E21, E22) Amend IDP cost as suggested: £16,150,000 £24,000,000 Amend rating from 'desirable' to 'important'.
Exeter Plan	IDP entry:	New wording (Column 1):	Agreed. Amendment to the	DCC welcomes ECC's	No modifications required

evidence: Infrastructure Delivery Plan	Water Lane active travel package	Devon County Council requests the wording is changed to that shown in bold in Column 1 to provide clarity on what the term 'active travel package' is referring to.	transport elements of the IDP to be made as suggested.	response and agreement to amend this wording.	to the Exeter Plan. Amend the IDP entry as suggested: Water Lane active travel package as referred to in the adopted Water Lane SPD
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Tan Lane railway arch: Bus and pedestrian and cycle access related to Water Lane	Post Regulation 19 discussion: Remove this item and include within the overarching entry of the 'Water Lane active travel package'.	Agreed. Remove this item and include in the 'Water Lane active travel package' entry.	DCC welcomes ECC's response and agreement to amend this item of the IDP.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Water Lane active travel package as referred to in the adopted Water Lane SPD, including Tan Lane railway arch bus and pedestrian route and Water Lane railway underbridge improvement for active travel
Exeter Plan evidence: Infrastructure Delivery Plan	IDP entry: Water Lane railway line underbridge improvement for active travel related to Water Lane	Post Regulation 19 discussion: Remove this item and include within the overarching entry of the 'Water Lane active travel package'.	Agreed. Remove this item and include in the 'Water Lane active travel package' entry.	DCC welcomes ECC's response and agreement to amend this item of the IDP.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: Water Lane active travel package as referred to in the adopted Water Lane

					SPD, including Tan Lane railway arch bus and pedestrian route and Water Lane railway underbridge improvement for active travel
Exeter Plan evidence: Infrastructure Delivery Plan	Additional pedestrian and cycle bridge over the canal linking Water Lane and Riverside Valley Park	Cost change (Column 4): The estimated cost is likely to be circa £5,000,000 and as such we would request this is included within Column 4 'Estimated Project Cost'.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend IDP cost as suggested: TBC £5,000,000
Exeter Plan evidence: Infrastructure Delivery Plan	Pedestrian facilities on Western Way	Amended wording (Column 1): We request that the wording in Column 1 is amended to that highlighted in bold to better reflect the nature of any works which may include both improving existing infrastructure and/ or creating new infrastructure where identified.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: A series of pedestrian and cycle crossings of Improved cycle and pedestrian crossings on Western Way, radial routes and key junctions including former Exeter bypass, Exe Bridges, Paris Street roundabout, and Sidwell Street/Blackboy Road roundabout

Exeter Plan evidence: Infrastructure Delivery Plan	East Gate pedestrian and public realm improvements	Amended wording (Column 1): Devon County Council requests that the reference to Cheeke Street is removed so that specific improvements are identified and agreed at a later date.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP entry as suggested: East Gate pedestrian and public realm improvements including additional crossing of Cheeke Street
Exeter Plan evidence: Infrastructure Delivery Plan	South Street public realm enhancement project	Cost change (Column 4): Given we have do not have (sic) sufficient detail on the plans for this area we would request that costing is marked as TBC.	Agreed. Amendment to the transport elements of the IDP to be made as suggested.	DCC welcomes ECC's response and agreement to amend this wording.	No modifications required to the Exeter Plan. Amend the IDP cost as suggested: £15,000,000 TBC
Exeter Plan evidence	Strategic traffic modelling	N/A	Following review of the DCC response, it is clear that although some representations were made regarding the transport elements of the IDP, no representations were made regarding the transportation elements of the Exeter Plan itself. On this basis, no junction-specific traffic modelling for the local highway network is required to inform the	DCC has no further comments to make.	No modifications required on the basis of this specific response although the IDP now makes reference to a strategic transport package serving the wider area.

			content of the Exeter Plan at this stage. Some operational assessments may be required in a small number of cases to provide greater clarity regarding operational capacity of a limited number of junctions. This work would inform the IDP but is not required to determine the soundness of the plan.		
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Education

16.7 The comments on the IDP relating to education are addressed in the table below. Discussions have taken place since the Regulation 19 consultation.

Issue	IDP entry	DCC's representation	ECC comment	DCC's comment	Final position
Exeter Plan evidence: Infrastructure Delivery Plan	New primary school at Water Lane	Additional Wording (Column 1): The site size required to deliver the new primary school at Water Lane has been omitted from the IDP and needs to be included to ensure that it follows current Government guidance (Building Bulletin 103). We request that the	Column 1: ECC does not consider it necessary to specify the site area requirements for the primary school. Policy SBA1 specifically requires provision to be made for a two-form entry primary school at Water Lane. This is supported by the	DCC accepts ECC's position with regards to the specification of site size but requests that the IDP states that "School provision is to comply with Department for Education Area guidelines for mainstream schools: building bulletin 103, or any successor document,	No modifications required to the Exeter Plan. Amend the IDP, for schools generally, as follows: 'School provision is to comply with Department for Education Area guidelines for mainstream schools: Building Bulletin

		wording in bold in Column 1 is added to the description. Cost based on £20,305 primary new build rate per pupil. Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to A.	Liveable Water Lane SPD. Specifying the site area is considered to be inflexible given the restricted land availability in the area. A study in the evidence for the Exeter Plan (the Water Lane Primary School Options Appraisal) demonstrates how a two-form entry primary school could be delivered on a site smaller than 1.6ha. ECC does not consider that modification is required. Agreed. Amendment to the description text relating to cost in the IDP to be made as suggested: 'Cost based on £20,305 primary new build rate per pupil'. Column 3: ECC recognises that schools are essential community facilities.	in the context of site constraints." DCC accepts ECC's point made with regards to the request to amend the IDP classification from 'Important' to 'Critical'. DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it therefore acknowledges that ECC does not consider an amendment to be necessary. DCC welcomes the addition to the agreed text and the inclusion of a point of clarification outlining that the 'Cost based on £20,305 primary new build rate per pupil.' It should also be noted for clarity that the per pupil rate will be subject to indexation.	103, or any successor document, in the context of site constraints'. No modification required. Include additional text in the IDP generally to state that 'Costs are subject to indexation'.
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		Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Columns 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	However, they are not considered to be critical. A critical classification is limited in this IDP to a small number of projects without which development cannot come forward. An example would be critical utilities infrastructure. ECC does not consider that modification is required. Columns 5 and 6: Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.	As the new school is required to specifically mitigate the Water Lane allocation it is expected that the school land will be at nil cost to DCC. However, any additional land required may be an additional cost and related contributions may be sought DCC welcomes the removal of any reference to the ESFA and DfE as it is not expected for government funding to be forthcoming from these sources in the future for new school provision.	Add text to say 'The cost of land may be additional and related contributions may be sought'. No modification required.
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Exeter Plan evidence: Infrastructure Delivery Plan	Additional infrastructure project to be added: Early years at Water Lane	Additional row required: In order to allow for early years provision requirements in line with the County Council's Education Infrastructure Plan and Education Infrastructure Section 106 Approach. Classification (Column 3): It is essential this classification is identified a 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Column 5 & 6: We request that there is no reference made to ESFA	Additional project: ECC agrees that a new row to include early years at Water Lane should be added to the IDP as proposed by DCC with a cost stated as £426,000. Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is limited in this IDP to a small number of projects without which development cannot come forward. An example would be critical utilities infrastructure. ECC does not consider that modification is required. Columns 5 and 6:	DCC welcomes the addition of a new row, with costing, to include early years at Water Lane but would request that the costing is updated to £450,000 to take into account the allocation of 1800 dwellings at Water Lane DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it is therefore acknowledged that ECC does not consider an amendment to be necessary. DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	No modifications required to the Exeter Plan. Add a new IDP entry as follows: 'New Early Years Provision at Water Lane primary school'. Cost £450,000. No modification required. Remove reference to the ESFA and DfE.
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		and DfE as we are not expecting government funding to be forthcoming from these sources in the future	Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.		
Exeter Plan evidence: Infrastructure Delivery Plan	Second new primary school	'Further additional primary provision: Second new primary school with capacity for 420 pupils on a site of at least 1.6ha. Communal space and office as a children's centre service delivery base. Site to be confirmed. Cost based on £20,305 primary new build rate per pupil' (2021). Additional Wording, (Column 1):	ECC recognises the need to include this project in the IDP. Given the ongoing discussion regarding the evidence base for education and the methodology used by DCC to calculate future pupil generation being based on an assumption that all future residential units at allocations will generate pupils, it is considered appropriate to include additional text to the project description as follows: 'Site to be confirmed and requirement subject to future assessment of need'. Column 1:	DCC accepts ECC's position with regards to the specification of site size but requests that column 1 of the IDP is amended to include the wording in red bold: Second new primary school to comply with Department for Education Area guidelines for mainstream schools: building bulletin 103, or any successor document, in the context of site constraints. Communal space and office as a children's centre service delivery base. Site to be confirmed. Cost based on £20,305 primary new build rate per pupil' (2021).	No modifications required to the Exeter Plan. Amend the IDP entry as follows: Amend the IDP, for schools generally, as follows: 'School provision is to comply with Department for Education Area guidelines for mainstream schools: Building Bulletin 103, or any successor document, in the context of site constraints. 'Second new primary school to comply with Communal space and office as a children's centre service delivery base. Site to be confirmed. Cost based on £20,305 primary new build rate per pupil' (2021).'

		The site size required to deliver the new primary school at Water Lane has been omitted from the IDP and needs to be included to ensure that it follows current Government guidance (Building Bulletin 103). We request that the wording in bold is added to the description:	ECC does not consider it necessary to specify the site area requirements for the primary school. A study in the evidence for the Exeter Plan (the Water Lane Primary School Options Appraisal) demonstrates how a two-form entry primary school could be delivered on a site smaller than 1.6ha. ECC does not consider that modification is required. ECC is content with the reference to the cost and therefore amendment to be made to modify the IDP entry to make reference to the cost of the school per pupil.	DCC welcomes the addition to the agreed text and the inclusion of a point of clarification outlining that the 'Cost based on £20,305 primary new build rate per pupil.' It should also be noted in column 1 that for clarity the per pupil rate will be subject to indexation. The cost of land may be an additional cost and related contributions may be sought. DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision. DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it	Include additional text in the IDP generally to state that 'Costs are subject to indexation'. Add text to say 'Costs do not include land'. Remove reference to the ESFA and DfE. No modification required.
		Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as	Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is limited in this IDP to a		

		recognised by Paragraph 15.24 of the Local Plan. Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	small number of projects without which development cannot come forward. An example would be critical utilities infrastructure. ECC does not consider that modification is required. Columns 5 and 6: Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.	therefore acknowledges that ECC does not consider an amendment to be necessary	
Exeter Plan evidence: Infrastructure Delivery Plan	Additional infrastructure project to be added: Further additional primary provision: 210 place expansion	Additional row required: In order for the IDP to be consistent with the Local Plan and Devon County Council's school place provision requirements we would request that an additional row is added with the description as highlighted in bold in Column 1 and with the 'Critical' classification	Additional project: ECC recognises the need for this to be added to the IDP. Addition to be included as per the project name suggested by DCC.	DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it therefore acknowledges that ECC does not consider an amendment to be necessary.	No modifications required to the Exeter Plan. Amend the IDP entry as follows: Further additional primary provision: 210 place expansion of an existing primary school site. Cost: £3,600,000. £17,097 primary

		highlighted in bold in Column 3.	Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is limited in this IDP to a small number of projects without which development cannot come forward. An example would be critical utilities infrastructure.	DCC welcomes the inclusion of an additional row and associated text including costing. DCC also requests that the following costing is added to Column 4 as previously communicated: Cost £3,600,000 (£17,097 primary expansion rate per pupil (2021)) It should also be noted for clarity that the cost quoted/per pupil rate will be subject to indexation.	expansion rate per pupil (2021). Include additional text in the IDP generally to state that 'Costs are subject to indexation'.
		Column 4: Cost £3,600,000 (£17,097 primary expansion rate per pupil (2021))	ECC does not consider that modification is required. Column 4: Cost of £3,600,000 agreed	DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	Remove reference to the ESFA and DfE.
		Column 5 & 6: We request that there is no	Columns 5 and 6: Agreed that reference to the ESFA and DfE is not required.		

		reference made to ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.			
Exeter Plan evidence: Infrastructure Delivery Plan	Early years provision at second primary school and extended primary school	Additional Wording, (Column 1): In order to allow for early years provision requirements in line with the County Council's Education Infrastructure Plan and Education Infrastructure Section 106 Approach we request that the wording in bold is added to the description. Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan.	Column 1. ECC agrees that the additional references to early years provision at the second new primary school and expanded primary school should be included. Amendment to be made as suggested with the addition of the text 'subject to needs assessment'. Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is limited in this IDP to a small number of projects without which development cannot come forward. An	DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it therefore acknowledges that ECC does not consider an amendment to be necessary. DCC welcomes ECC's agreement to include the following text in bold as proposed: "New early years provision at second new primary school and extended primary school(s). Early Years cost based on £250 x 9000 family-type dwellings."	No modifications required to the Exeter Plan. Add a new entry into the IDP as follows: 'New early years provision at second new primary school and extended primary school (s). Early Years cost based on £250 x 9000 family-type dwellings (2021). Costs subject to indexation. The cost of land may be additional and related contributions may be sought'. Remove reference to the ESFA and DfE.

		Columns 5 and 6: Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	example would be critical utilities infrastructure. ECC does not consider that modification is required. Columns 5 and 6: Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.	DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision. It should also be noted in column 1 that for clarity the per pupil is rate will be subject to indexation. The cost of land may be an additional cost and related contributions may be sought.	
Exeter Plan evidence: Infrastructure Delivery Plan	City-wide secondary school provision	Classification amendment (Column 3): It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Expansion of existing Exeter secondary schools, at a cost of £23,540 secondary	Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is limited in this IDP to a small number of projects without which development cannot come forward. An example would be critical utilities infrastructure. ECC does not consider	DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it therefore acknowledges that ECC does not consider an amendment to be necessary. DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting	No modifications required to the Exeter Plan. Amend the IDP entry as follows: 'Expansion of existing Exeter secondary schools, at a cost of £23,540 secondary expansion rate per pupil (2021 rates). 1200 new secondary places will be required over the plan period'.

		expansion rate per pupil (2021 rates). 1200 new secondary places will be required over the plan period. Columns 5 and 6: Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future for new school provision.	that modification is required. Columns 5 and 6: Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.	government funding to be forthcoming from these sources in the future for new school provision. It should also be noted in column 1 that for clarity the per pupil is rate will be subject to indexation. The cost of land may be an additional cost and related contributions may be sought.	Include additional text in the IDP generally to state that 'Costs are subject to indexation'. Add text to say 'Costs do not include land'. Remove reference to the ESFA and DfE.
Exeter Plan evidence: Infrastructure Delivery Plan	Special school provision	Column 1: Include the additional wording shown in bold as new SEND places will be delivered within existing Exeter schools and also new planned provision outside of Exeter. Column 3: Classification amendment It is essential this classification is upgraded from 'Important' to 'A. Critical' to recognise the essential role educational	Column 1. ECC agrees with the additional text to refer to SEND provision 'both within and outside' of the city boundary. Column 3: ECC recognises that schools are essential community facilities. However, they are not considered to be critical. A critical classification is	DCC would prefer that education infrastructure is identified in the IDP as Critical. However, it is recognised that the definition of 'critical' is limited to a small number of projects and it therefore acknowledges that ECC does not consider an amendment to be necessary. DCC welcomes ECC's agreement to include our	No modifications required to the Exeter Plan. Amend the IDP entry as follows: 'Special School Provision: Provision likely to be made both within and outside of the city administrative boundary to accommodate Exeter and subregional development' Remove reference to the ESFA and DfE.

		infrastructure plays within the community as recognised by Paragraph 15.24 of the Local Plan. Columns 5 and 6: Delete reference to ESFA and DfE (Column 5 & 6): We request that reference to ESFA and DfE are removed as we are not expecting government funding to be forthcoming from these sources in the future	limited in this IDP to a small number of projects without which development cannot come forward. An example would be critical utilities infrastructure. ECC does not consider that modification is required. Columns 5 and 6: Agreed. Amendment to the IDP to be made as suggested to remove reference to the ESFA and DfE.	suggested text which identifies that new SEND places will be delivered within existing Exeter schools and also new planned provision outside of Exeter. DCC welcomes the removal of any reference to the ESFA and DfE as we are not expecting government funding to be forthcoming from these sources in the future for new school provision. It should also be noted in column 1 that for clarity the per pupil is rate will be subject to indexation. The cost of land may be an additional cost and related contributions may be sought.	Include additional text in the IDP generally to state that 'Costs are subject to indexation'. Add text to say 'Costs do not include land'.
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Exeter Plan evidence: Infrastructure Delivery Plan	Further education provision	DCC request that this row is removed as DCC has not requested contributions for Post-16 provision as it is only a statutory requirement for post-16 SEND students. We therefore propose that SEND contributions should also be used towards additional specialist Post-16 places. This will be provided as part of special school provision in the row above.	ECC consider that this requirement should remain in the IDP. The requirement for strategic further education provision was identified by Exeter College. It is not a requirement of development, rather is a high-level strategic requirement for the wider area and reflecting College, as opposed to DCC, aspirations. ECC does not consider that modification is required.	DCC are content that this text remains within the IDP.	No modifications required to the Exeter Plan. No modifications required to the IDP.
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17.0 Sustainability Appraisal and Habitats Regulation Assessment

Explanation of the SA and HRA

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

Addressing the response of Devon County Council to the Regulation 19 Exeter Plan

- 17.3 No representations were provided by Devon County Council regarding the Sustainability Appraisal or the Habitat Regulations Assessment at Regulation 19 stage.

18.0 Governance, review and signoff

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

Signed:



Name: Roger Clotworthy

Position: Exeter City Council

Signed:



Name: Sarah Ratnage

Position: County Planning Manager, Devon County Council

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

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