

Exeter Plan

Duty to Cooperate Statement

Version 2: Submission

September 2025

Exeter City Council
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Appendix A: List of statements of common ground on submission

1.0 Introduction

- 1.1. The duty to cooperate is a legal requirement introduced by the Localism Act 2011 that requires local planning authorities and other public bodies to engage constructively, actively, and on an ongoing basis when preparing Local Plans. The goal is to have strategic policies that reflect genuine cooperation and take into account wider policy implications beyond individual local authority boundaries.
- 1.2. As part of the preparation of the Exeter Plan (Exeter City Council's Local Plan), the City Council has collaborated extensively with other Councils, prescribed bodies and other relevant organisations as set out in this duty to cooperate statement. Constructive participation has taken place regarding strategic priorities and cross-boundary issues to ensure the Exeter Plan is deliverable over its term and does not conflict with the strategies of neighbouring areas.
- 1.3. This statement summarises how the City Council has complied with the duty to cooperate throughout the process of preparing the Plan. It outlines the main strategic issues for which cooperation is required, lists the partners constructively engaged, identifies the evidence produced and explains how joint working has influenced the development of policies. By producing this statement, the City Council demonstrates its legal compliance and how it has positively fulfilled its duty to cooperate obligations to date. Moving forward, the Council remains committed to continued collaboration with relevant bodies on strategic planning matters.
- 1.4. Version 2 updated this document in September 2025 to cover additional activity between publication and submission.
- 1.5. Each section of the document provides a summary of the position for that particular strategic topic at the point of the Exeter Plan submission. The majority of the summaries state that there are no outstanding strategic cross-boundary issues remaining. It should be noted that this does not necessarily mean that there are no detailed issues for that part of the Exeter Plan which are outstanding at the point of submission, but that the strategic matters are considered to have been addressed.
- 1.6. Appendix A provides a list of Statements of Common Ground agreed at the time of submitting the Exeter Plan. There are two Statements which are still in discussion at the time of submission.

2.0 Legislative context

- 2.1. The duty to cooperate was introduced by the Localism Act 2011 and enshrined within Section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils, and other prescribed public bodies to engage constructively, actively, and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross-boundary matters.
- 2.2. The National Planning Policy Framework (NPPF) emphasizes the importance of fulfilling the duty to cooperate as part of developing Local Plans in paragraphs 24 to 27 (December 2023 version). This refers to addressing matters which cross administrative boundaries, the bodies with whom Local Authorities need to cooperate, the importance of cooperation in terms of delivering an appropriate strategy and need for partnership working in terms of infrastructure planning.
- 2.3. Additionally, the Planning Practice Guidance provides further guidance.
- 2.4. The prescribed public bodies are listed in the Town and Country Planning (Local Planning) Regulations 2012. For the City Council, not all organisations will be relevant because they do not cover the Exeter area. On this basis, cooperation has involved joint working with the following partners:
 - Devon County Council (in various roles including transport, education and social services);
 - The Environment Agency;
 - Historic England;
 - Natural England;
 - National Highways; and
 - NHS bodies;
- 2.5. The nature of the cooperation required with these organisations will depend on the significance of the issues to be addressed. Where detailed cooperation has not taken place with prescribed bodies, this reflects that significant issues requiring cooperation have not been identified. These bodies have, however, been consulted throughout the period of preparing the Exeter Plan, including during four stages of public consultation up to submission.

3.0 Local context

- 3.1. Exeter is the regional capital of Devon with a resident population of approximately 130,000. It is also the centre of a large functional area.
- 3.2. The role of Exeter across the sub-region is defined by its status as the centre of the second largest travel to work area in England, the driver of the functional employment area, the focus of the Exeter housing market area and a centre of further and higher education via Exeter College and the University of Exeter.
- 3.3. The City Council has a long history of working with neighbouring authorities and other partners on a variety of cross-boundary initiatives.
- 3.4. The planning authorities in Devon previously worked under a Duty to Cooperate protocol, which set out steps to ensure that strategic issues are dealt with appropriately in the light of the duty to cooperate.
- 3.5. Over-time, cross boundary working has evolved to focus on the 'Greater Exeter area.' Although work on a Greater Exeter Strategic Plan did not progress past a draft document, this paved the way for a joint strategy for the area.
- 3.6. This non-statutory joint strategy called 'Our Shared Coordinates' was adopted by the City Council in November 2023 together with the other Local Planning Authorities in the area:
 - East Devon District Council;
 - Mid Devon District Council; and
 - Teignbridge District Council.
- 3.7. Devon County Council also supported this work which covers the following topics:
 - A vision for the area;
 - Net zero;
 - Jobs and prosperity;
 - Homes;
 - Quality places;
 - Nature; and
 - Connectivity.
- 3.8. This work has been progressed by a collaborative working group of the planning policy leads at the five Councils. The group meets bimonthly and forms the basis of proactive collaborative work across the area.
- 3.9. The City Council also actively participates in an informal meeting of all the Planning Authorities in Devon and Cornwall. The Devon and Cornwall Planning Officers Group is chaired by an officer from the City Council.

4.0 Cross boundary issues

4.1. The Exeter Plan is split into a series of themed chapters. Those with specific cooperation issues identified form the structure of this statement. The key cross-boundary issues are covered under each of these themes:

- Climate change;
- Homes;
- Economy and jobs;
- Sustainable transport and communications;
- Natural environment;
- History and heritage; and
- Infrastructure and facilities.

5.0 Climate change

Cross-boundary issues identified

- 5.1 The planet is facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. This is a global issue.
- 5.2 The importance of climate change is shown by its inclusion as one of the key issues facing the Greater Exeter area as identified in the Joint Strategy 'Our Shared Coordinates'. This feeds into 'net zero' as one of the shared coordinates which need to be addressed across the area.
- 5.3 DCC and all the neighbouring authorities to the City Council have also declared climate emergencies. Whilst the time scales for delivering net zero differ, the aspirations of all councils are similar and working in the same direction.
- 5.4 The spatial strategies and policies of our neighbouring authorities all seek to mitigate climate change and adapt to the unavoidable impacts of climate change.

Activity and work undertaken

- 5.5 The Devon Carbon Plan is the roadmap for how Devon will reach net-zero by 2050 at the latest. The Partner organisations who have endorsed the Devon Carbon Plan include the City Council alongside Devon County Council and East Devon, Mid Devon and Teignbridge District Councils.
- 5.6 Alongside endorsing the Devon Carbon Plan, the City Council has declared a climate emergency and pledged to work towards creating a net zero carbon city by 2030. The Net Zero Exeter 2030 Plan sets out what will need to put in place for the city to be net zero carbon by 2030.
- 5.7 The City's net zero carbon ambition sits well with the Devon Carbon Plan and the aspirations of neighbouring authorities.
- 5.8 When it comes to adapting to the unavoidable impacts of climate change, addressing flood risk is key. The City Council has worked in partnership with those organisations with flood risk responsibilities (including the Environment Agency and Devon Country Council) to produce key evidence documents. Discussions with these organisations are ongoing. A wider stakeholder group has also fed into two workshops held to inform the Strategic Flood Risk Assessment level two work.
- 5.9 Ongoing discussions with Natural England have also led to the insertion of a new policy into the Exeter Plan to ensure development is adaptive and resilient to climate change.
- 5.10 More widely, ongoing discussions have fed into the drafting of various policies in the climate change chapter of the Exeter Plan. These have taken place throughout the preparation of the Plan.

Associated evidence

- 5.11 Membership of the South West Energy and Environment Group (SWEED) allows for the exchange of ideas and the sharing of best practice across the partnership. The Centre for Energy and Environment at the University of Exeter has produced much of the climate change evidence through the SWEED partnership.
- 5.12 Work from external organisations informed by widespread cooperation also forms part of the evidence base for the plan (including, for example, work evidence produced by South West Water).
- 5.13 Key evidence for the Exeter Plan which has been informed by cooperation includes:
- Level 1 Strategic Flood Risk Assessment;
 - Level 2 Strategic Flood Risk Assessment;
 - South West Water Evidence for increased Water Efficiency;
 - A package of evidence documents to inform local energy networks; and
 - Devon, Cornwall and Scilly Climate Change Adaptation Plan.

Policy outputs

- 5.14 In acknowledgement of climate change as a vital challenge facing the city and the wider area and the world, the Exeter Plan includes policies and proposals that contribute to meeting the 2030 net zero ambition, making the most of the opportunities of a net zero carbon city, whilst adapting to the unavoidable impacts of climate change.
- 5.15 The most central influence for the Exeter Plan comes from the spatial strategy in Policy S1 which is focused firmly on brownfield redevelopment within the urban area. This will support the delivery of the city's ambition for net zero, climate change adaptation and resilience.
- 5.16 Policies which have been informed by cooperation with prescribed bodies throughout the preparation include are:
- CC1: Net Zero Exeter;
 - CC3: Local energy networks;
 - CC7: Development that is adaptive and resilient to climate change;
 - CC8: Flood risk; and
 - CC9: Water quantity and quality.

2025 update: publication to submission

- 5.17 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:
- Additional discussions and meetings with:
 - Environment Agency in relation to flood risk issues;
 - South West Energy and Environment Group.

- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Emergency Access and Egress Route Plans for the Water Lane, Red Cow and Exe Bridges allocations (Environment Agency);
 - Future development standards report (SWEED).
- Statement of common ground agreed with the Environment Agency.

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to climate change:

None

6.0 Homes

Cross-boundary issues identified

- 6.1 Housing affordability is one of the key issues facing the Greater Exeter area as identified in the Joint Strategy 'Our Shared Coordinates'. This feeds into 'Homes' as one of the shared coordinates which need to be addressed across the area.
- 6.2 Exeter sits at the heart of the Exeter Housing Market Area (HMA) which covers Exeter, East Devon, Mid Devon and Teignbridge (including the area of the Dartmoor National Park Authority in Teignbridge). This drives cooperative working across this area on housing matters.
- 6.3 Each Local Authority in the Exeter HMA that has either adopted, or is preparing a new Local Plan to similar timescales as the City Council, has a development strategy to accommodate its own housing needs.
- 6.4 However, there has been significant joint working to ensure that planned housing requirements reflect growth ambitions linked to economic development or infrastructure investment. Given Exeter's position at the heart of the economy of the Greater Exeter area, it has been necessary to consider this matter in the context of the Greater Exeter area's economy.
- 6.5 The 2023 NPPF states (at paragraph 61) that, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for. In its response to the Full Draft Exeter Plan consultation, Torbay Council (which sits in the Torbay HMA) advised that they were unlikely to be able to deliver in full its local housing need figure within Torbay. The response advised that Torbay Council therefore needed to alert other authorities within adjoining housing market areas that it was unable to meet its local housing need figure in full and commented that population growth from within the sub-region arises from national migration and should therefore be considered at a larger than local level.
- 6.6 The 2023 NPPF requires local planning authorities to assess the housing needs of Travellers and reflect these in planning policy. Best practice indicates that such assessments are undertaken at sub-regional level, due to the lifestyle of many Gypsies and Travellers.
- 6.7 The 2023 NPPF requires local planning authorities to assess the housing needs of older people and people with disabilities. There is also a pressing need for a range of other types of supported housing in Exeter. The City Council identified that the Exeter's Plan's approach to addressing these needs should be undertaken in co-operation with Devon County Council, as the lead authority for social care.

Activity and work undertaken

- 6.8 A series of ongoing discussions have been held across the Exeter Housing Market Area with the neighbouring Authorities of East Devon, Mid Devon and

Teignbridge including as needed Devon County Council and Torbay Council (a separate HMA). These meetings are not discussed exhaustively here but included the following:

- Collaborative meeting and emails including the City Council, East Devon, Mid Devon and Teignbridge District Councils, Dartmoor National Park Authority and Devon County Council to agree updates to the 2017 Exeter HMA HELAA Methodology, to ensure a consistent approach was taken to assessing the capacity for housing and economic development across the sub-region. The final document (2021 HELAA Methodology) was subsequently agreed.
- A series of ongoing meetings and discussions in 2021 and 2022 between the City Council, East Devon, Mid Devon and Teignbridge District Councils to agree progress on a joint a Local Housing Needs Assessment.
- A series of meetings and discussions in 2024 between the City Council, East Devon, Mid Devon and Teignbridge District Councils to feed into an updated Local Housing Needs Assessment for Exeter. This included a further joint piece of work to prepare a Jobs and Workers Balance Assessment to consider whether there was a need to set Local Planning Authority housing requirements which deviate from original local housing needs to take account of economic forecasts. The assessment concludes that, for all jobs growth scenarios assessed in the Economic Development Needs Assessment, Exeter's local housing need figure will contain a surplus of workers compared with the jobs projections.
- A series of meetings between 2022 and 2024 between the City Council and Torbay Council to discuss Torbay's housing need and potential capacity issues, with the City Council seeking further evidence in relation to Torbay housing capacity. In latter discussions between the City Council and Torbay Council, Torbay Council have not sought that any of Torbay's need should be met in Exeter.
- A series of meetings involving representatives from the City Council, East Devon, Mid Devon and Teignbridge District Councils and Devon County Council to discuss a way forward for undertaking a new Gypsy and Traveller Accommodation Assessment (GTAA) for the four local planning authorities. It was agreed that the GTAA should cover the four authorities and could also provide a baseline/methodology for other Devon authorities looking to undertake a GTAA in the future.
- Additional meetings have been held to discuss the process of delivering a new permanent site for Gypsies and Travellers and making appropriate transit provision. Specific meetings were also held between the City Council and Devon County Council (planners, estates teams and gypsy and travel liaison officer) regarding potential site availability.
- Emails and meetings between the City Council and Devon County Council (planners, housing and adult and social care) to consider how the

Exeter Plan could consider the need for housing for care/key workers linked to DCC's work on the 'Devon Care Offer'. Work included further regular discussions on how the Exeter Plan might assist in helping to deliver new and affordable homes for older people and people with support needs.

- Discussions with and input from key stakeholders into the Housing and Economic Land Availability Assessment (three versions). This included:
 - Devon County Council (transport, flood risk, minerals and waste planning);
 - Environment Agency;
 - NHS;
 - South West Water;
 - National Highways; and
 - Natural England.

Associated evidence

6.9 A wide range of housing evidence has been compiled through cooperation. The includes:

- East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: 2022 (and subsequent 2024 Exeter update);
- East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Jobs and Workers Balance Assessment;
- Exeter City Council Gypsy and Traveller Accommodation Assessment; and
- Housing and Economic Land Availability Assessment and associated methodology and HELAA panel terms of reference.

Policy outputs

6.10 Discussions relating to the cross-boundary housing issues have informed the drafting of a series of policies in the Exeter Plan. These are:

- S1: Spatial strategy
- H1: Housing requirement;
- H2: Housing allocations and windfalls;
- H3: Regeneration opportunity areas;
- H8: Housing and older people;
- H9: Supported housing
- H11: Gypsy and Traveller accommodation; and
- Allocation policies.

2025 update: publication to submission

6.11 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:

- Additional discussions with: East Devon District Council, Mid Devon District Council, Teignbridge District Council, Devon County Council and Torbay Council regarding housing need, gypsy and traveller encampments and shared approach to record unauthorised gypsy and traveller encampments, and statements of common ground.
- Additional evidence: none
- Statements of common ground agreed:
 - Exeter Housing Market Area statement of common ground with East Devon District Council, Mid Devon District Council and Teignbridge District Council;
 - Housing need statement of common ground with Torbay Council;
 - Statement of common ground with Devon County Council includes agreement on gypsy and traveller policy approach.

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to homes:

None. The Exeter Plan is meeting housing needs in full within the Exeter City Council administrative area.

7.0 Economy and jobs

Cross-boundary issues identified

- 7.1 The economy is one of the key issues facing the Greater Exeter area as identified in the Joint Strategy 'Our Shared Coordinates'. This feeds into 'jobs and prosperity' as one of the shared coordinates which need to be addressed across the area.
- 7.2 The identification of the economy and jobs as a strategic, cross-boundary issue follows the local geography of the area as opposed to administrative areas. A functional economic market area (FEMA) is not constrained by administrative boundaries but reflects the way the economy works; the relationships between where people live and work, the scope of service market areas and catchments. The area covered by the City Council and East Devon, Mid Devon and Teignbridge District Councils is a single FEMA with Exeter at its centre.
- 7.3 Policy S1 in the Exeter Plan specifically includes strands relating to economic strategy, focusing on enabling traditional and new forms of employment provision in the city, developing the transformational sectors and supporting improvements to education and skills to ensure employment needs are met. The Strategy also identified the importance of working with neighbouring Councils to ensure that the employment needs of the wider functional economic area are also provided for. This specifically makes reference to the need for cooperation across the wider area.
- 7.4 Policies within the Exeter Plan maximise the potential of Exeter to contribute to meeting economic development needs by supporting the transformational sectors, retaining established employment areas, delivering new forms of employment provision and allocating new employment sites.
- 7.5 Following previous rounds of consultation on the Exeter Plan, the City Council notes the issues raised and has sought to address these by making changes to the emerging Plan, including:
- Removal of Marsh Barton allocation and replacement with a regeneration opportunity area;
 - Removal of North Gate allocation and replacement with a regeneration opportunity area;
 - Inclusion of new policy wording to require no loss of employment space at some of the strategic allocations and an increase at others; and
 - Inclusion of policy wording to ensure efficient use of land.

Activity and work undertaken

- 7.6 Various activities have taken place to address the need for cooperation on key strategic issues. This work includes:

- Ongoing discussions between the City Council, Devon County Council and East Devon, Mid Devon and Teignbridge District Councils.
- Jointly commissioned evidence involving City Council, Devon County Council and East Devon, Mid Devon and Teignbridge District Councils.
- A specific duty to cooperate meeting held in April 2024.
- Stakeholder input into the employment site assessment.

Associated evidence

7.7 The Exeter Plan evidence base is robust and complete. Evidence commissioned jointly between the City Council and East Devon, Mid Devon and Teignbridge District Councils includes:

- Economic Development Needs Assessment; and
- Housing and Employment Land availability Assessment.

Policy outputs

7.8 Discussions relating to the cross-boundary economic issues have informed the drafting of a series of policies in the Exeter Plan. These are:

- S1: Spatial strategy;
- H2: Housing allocations and windfalls (removal of Marsh Barton and North Gate);
- H3: Regeneration opportunity areas (new policy to include Marsh Barton and North Gate);
- EJ1: Economic growth;
- EJ2: Retention of employment land;
- EJ6: New transformational employment allocations; and
- Allocation policies.

2025 update: publication to submission

7.9 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:

- Additional discussions and meetings with East Devon District Council around representations provided to publication plan, and employment evidence.
- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Employment supply in Greater Exeter;
 - Employment change in Exeter.
- Statement of common ground agreed with East Devon District Council.

Summary position on submission of the Exeter Plan:

Outstanding strategic cross-boundary issues:

One. East Devon District Council hold the position that the Exeter Plan does not allocate sufficient sites for employment development to meet the need of the city.

8.0 Sustainable transport and communications

Cross boundary issues identified

- 8.1 Exeter is at the centre of an extensive travel to work area, the second largest in England. This predominantly covers Exeter, East Devon, Mid Devon and Teignbridge with Devon County Council as the local transport/highway authority.
- 8.2 On this basis there is a shared understanding set out in 'Our Shared Coordinates' of transport as a key issue and 'connectivity' a vital 'shared coordinate' for delivering sustainable growth.
- 8.3 This, together with the broadly parallel preparation of three local plans in the area and the Draft Local Transport Plan 4 has resulted in significant cooperative working across the subregion on transport matters.

Activity and work undertaken

- 8.4 Joint transport work has been ongoing for many years with the evidence base for the Exeter Plan reflecting work produced in 2016.
- 8.5 The single most significant element of cooperation which has taken place since the beginning of 2023 is the ongoing strategic transport modelling project. This has seen the District Councils of East Devon, Exeter, Mid Devon and Teignbridge commission joint traffic and transport modelling work via Devon County Council with ongoing involvement of National Highways. This covers the local and strategic network in and around Exeter.
- 8.6 The technical work is ongoing and addresses the transport impact of the proposed local plan development across the four Districts. Devon County Council as the local transport authority provide strategic steer to the project, particularly in terms of addressing issues on the local highway network. National Highways provide high level scrutiny of the work in terms of addressing issues on the strategic road network.
- 8.7 The technical work is using a combination of County Council and National Highways traffic models.
- 8.8 Other discussions have also taken place with Devon County Council and National Highways to feed into infrastructure planning and policy development.
- 8.9 To support the transport work as a whole the following activities have taken place or are ongoing:
 - **Greater Exeter transport strategy workshop: January 2024**
Involving East Devon District Council, Exeter City Council, Mid Devon District Council, Teignbridge District Council, Devon County Council and National Highways.
 - **Ongoing three weekly project meetings**

Involving East Devon District Council, Exeter City Council, Mid Devon District Council, Teignbridge District Council, Devon County Council and National Highways.

- **Ongoing six weekly meetings**
Involving Exeter City Council and National Highways
- **Ongoing three weekly meetings**
Involving Exeter City Council and Devon County Council as part of wider infrastructure planning and policy discussions

Associated evidence

8.10 The strategic transport strategy and modelling work is ongoing. However, to date the following evidence has been produced jointly and is published:

- Future of transport scenario planning workshops;
- Greater Exeter Strategic Modelling Report;
- Greater Exeter Forecasting Report;
- Exeter model update report;
- Future travel demand report;
- Trip rates report;
- Greater Exeter modelling technical notes; and
- Greater Exeter initial modelling results.

8.11 Further work is planned to further the understanding of a wider range of infrastructure improvements required to mitigate sub-regional development impact on the highway network in and around Exeter. This will be reported in due course.

Policy outputs

8.12 The strategic modelling work, discussions with Devon County regarding sustainable transport infrastructure and responses to the various drafts of the Exeter Plan have resulted in the inclusion of, and revisions to, the following policies in the Publication Draft of the Exeter Plan. Close working with officers from Devon County directly shaped the early versions of policies STC3 and STC4.

- STC1: Sustainable movement;
- STC2: The transport hierarchy;
- STC3: Supporting active travel;
- STC4: Supporting public transport;
- STC5: Supporting more sustainable forms of car use;
- STC8: Motorway service area; and
- Allocation policies.

2025 update: publication to submission

8.13 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:

- Additional discussions and regular meetings with: Devon County Council and National Highways on transport policy, and continued work and modelling on the Greater Exeter Transport Study.
- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Further rounds of modelling for the Greater Exeter Transport Study.
 - Clyst Road Access Strategy to consider development in Topsham (Devon County Council);
 - Transport empirical data report (Devon County Council);
 - Infrastructure Delivery Plan updated with transport requirement.
- Statements of common ground agreed with:
 - Devon County Council;
 - National Highways.

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to sustainable transport and communications:

None

9.0 Natural environment

Cross-boundary issues identified

- 9.1. Nature recovery and landscape (also linked with heritage) are two of the key issues facing the Greater Exeter area as identified in the Joint Strategy 'Our Shared Coordinates'. This feeds into 'nature' as one of the shared coordinates which need to be addressed across the area.
- 9.2. This approach reflects that the natural environment does not perceive or respect the administrative boundaries of districts and counties. This is why many aspirations, for example delivering nature recovery and protecting valued landscapes, need to be addressed at the strategic level.
- 9.3. The importance of the natural environment feeds through in Policy S1: Spatial Strategy, of the Exeter Plan. It has a series of clear aims to protect the landscape value of the sensitive hills which provide the vital setting of the city and enhance biodiversity throughout the city improving the ecological value of the River Exe, its estuary and wildlife networks. In addition, the spatial strategy refers to enabling development in locations which link effectively to the Valley Parks as vital green infrastructure whilst ensuring their protection and enhancement.
- 9.4. Specific cross- boundary issues have been identified in relation to:
 - Delivering nature recovery;
 - Habitat mitigation; and
 - Landscape.
- 9.5. There have been on-going meetings and discussions regarding these issues to ensure a strategically robust approach that delivers for the wider area.
- 9.6. Although only an emerging strategy, the Devon Local Nature Recovery Strategy will support the Exeter Plan. Devon County Council is leading on this work which will set out the priorities and actions required to achieve the Devon Nature Recovery Network. Exeter has been an active member of the partnership that is delivering the strategy and will continue to work closely with Devon County Council. The emerging approach to the LNRS has informed policies within the Exeter Plan. Work on the LNRS started in 2022 and it is expected to be published in 2025.
- 9.7. In terms of habitat mitigation, considerable work has been undertaken to avoid development impact on the Exe Estuary SPA and other nearby internationally important sites from increased recreational disturbance due to new residential development.
- 9.8. A habitats mitigation strategy has been agreed working alongside East Devon and Teignbridge District Councils and Natural England. This strategy includes management of recreation on the Exe Estuary, Dawlish Warren and the Pebblebed Heaths and delivers off-site infrastructure including Suitable Alternative Natural Greenspace (SANG) and local projects. These measures are funded by development. The strategy has been in place for some years but has been updated and covers the period 2025 to 2030. It will be updated

on a rolling basis every five years, providing the opportunity to check the scale of development proposed across the area, reconsider mitigation requirements and update any associated mitigation costs. The implementation of the Joint Mitigation Strategy is managed by a formally constituted Joint Committee which has delegated powers provided to it by the City Council and East Devon and Teignbridge District Councils.

- 9.9. Landscape is a strategic cross-boundary issue. Exeter has worked closely with Devon County Council and neighbouring authorities to ensure there is a consistent approach to landscape assessment and evidence methodology. The Green Infrastructure Strategy (which was produced in partnership with East Devon and Teignbridge District Councils) clearly identifies the spatial framework for Exeter and the surrounding area. This conceives Exeter as a compact city with a clear distinction between the urban area and the countryside within which it sits.

Activity and work undertaken

- 9.10. Various activities have taken place to address the need for cooperation on key strategic issues. This work includes:
- Ongoing discussions including meetings, workshops and wider correspondence since 2022 on an updated Joint Habitats Mitigation Strategy;
 - Ongoing discussions including meetings, workshops and wider correspondence since 2022 on the Local Nature Recovery Strategy;
 - Various discussions with Devon County Council to consider a strategic and consistent approach to landscape evidence; and
 - Discussions with East Devon District Council to ensure alignment between their plans for the Clyst Valley Regional Park to the east of the city and plans for a new Valley Park in the City Council area north east of Topsham.

Associated evidence

- 9.11. Key evidence for the Exeter Plan that has been informed by cooperative working includes:
- Updated Joint Habitat Mitigation Strategy (covering Exeter and parts of East Devon and Teignbridge with endorsement from Natural England); and
 - Green Infrastructure Strategy produced jointly for Exeter, East Devon and Teignbridge.

Policy outputs

- 9.12. Discussions relating to the cross-boundary natural environmental issues have informed the drafting of a series of policies in the Exeter Plan. These are:
- S1: Spatial strategy;

- NE2: Landscape setting areas;
- NE2: Valley Parks;
- NE3: Biodiversity' and
- NE4: Green infrastructure.

2025 update: publication to submission

9.13 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:

- Additional discussions and meetings with Teignbridge District Council.
- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Exeter's valued landscapes;
 - Updated Joint Habitats Sites Mitigation Strategy (covering Exeter and parts of East Devon and Teignbridge with endorsement from Natural England).
- Statements of common ground agreed with:
 - Teignbridge District Council;
 - Natural England.

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to the natural environment:

None

9.0 History and heritage

Issues identified

- 10.1. The issues identified in relation to history and heritage arguably have fewer wide-ranging impacts over the wider area than is the case with some of the other matters included in this statement which function across an area covering four District Council areas.
- 10.2. However, particular issues were raised by Historic England and Devon County Council, both prescribed duty to cooperate bodies, during public consultation. These issues relate to the potential impact of a significantly brownfield development strategy on the heritage assets in Exeter.
- 10.3. Of particular need for consideration are the cathedral, the City Walls, a selection of churches and archaeology. Viewpoints of the first three have been identified as requiring assessment to ensure that development delivering an appropriate yield of homes can come forward on some of the key mixed-use strategic brownfield allocations without inappropriately impacting on the associated heritage assets.

Activity and work undertaken

- 10.4. The issues highlighted above were raised in responses to the full draft Exeter Plan consultation in later 2023/early 2024. In order to address these issues, a number of discussions were held with Historic England. Through the preparation of additional evidence as identified below, discussions were also held with Devon County Council.

Associated evidence

- 10.5. Following the consultation responses from Historic England and Devon County Council, two additional studies were undertaken during 2024.
 - Heritage Impact Assessment (HIA):
- 10.6. This was prepared internally by planning and heritage officers from the City Council. It considers all the sites assessed through the HELAA as potential development options for the Exeter Plan and provides a 'red, amber, yellow or green rating for all the sites in terms of potential development impact on relevant heritage assets.
- 10.7. As recommended by Historic England, the outputs of the HIA have been fed into the heritage assessment within the Sustainability Appraisal.
 - Viewpoints, density and heights study
- 10.8. The key heritage study supporting the Exeter Plan is the viewpoints, density and heights study. As already mentioned, this considers the potential yield of key mixed-use brownfield allocations in the context of ensuring acceptable impacts on key heritage assets. The key heritage study supporting the Exeter Plan is the viewpoints, density and heights study. This considers the potential

yield of key mixed-use brownfield allocations in the context of ensuring acceptable impacts on key heritage assets. The need for this study was highlighted by Historic England and Devon County Council.

- 10.9. The study is split into two parts; the first which identifies key views of heritage assets and the second which considers the potential impact of development on those assets.
- 10.10. Cooperation with interested bodies took place throughout the preparation of the study.
- Historic England were invited onto a project steering group for the study while their representatives also provided input into the writing of the brief;
 - Historic England and a series of other interest groups attended a workshop which informed the identification of key views;
 - Discussions were held with Devon County Council;
 - Additional discussions were held with Historic England; and
 - Historic England provided comments on the draft reporting of the study.

Policy outputs

- 10.11. The two studies undertaken helped to inform the sites selected for inclusion in the Exeter Plan together with the yields identified in plan policies. As an example, this was the case for the Exe Bridges Retail Park allocation.
- 10.12. The viewpoints, density and heights study is also identified in the site allocation policies for the strategic mixed-use brownfield allocations (Policies SBA1-5)
- 10.13. General discussions with Historic England also identified the need for additional consideration of a wider variety of heritage assets in the Exeter Plan. On this basis, additional policies covering Conservation Areas (Policy HH2) and archaeology (Policy HH3) have been added to the Exeter Plan.
- 10.14. In summary, policies informed by the cooperative work are:
- HH1: Conserving and enhancing heritage assets;
 - HH2: Conservation areas;
 - HH3: Archaeology; and
 - Allocation policies SBA1-5.

2025 Update: publication to submission

- 10.15 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:
- Additional discussions and meetings with Historic England.

- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Updated and renamed Exeter Skyline Study.
- Statement of common ground agreed with Historic England.

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to history and heritage:

None

10.0 Infrastructure and community facilities

Cross-boundary issues identified

- 11.1. Infrastructure is one of the key issues facing the Greater Exeter area as identified in the Joint Strategy 'Our Shared Coordinates'. Infrastructure is also the key delivery factor within the concluding chapter of the Joint Strategy as a central pillar to 'making it happen' – delivering the strategy.
- 11.2. The Joint Strategy also includes an infrastructure list which defines the types of projects which will be prioritised for delivery to support strategic growth across the area. These infrastructure themes include habitat mitigation, transport, education, health, utilities and district heating/renewable energy. These themes are consistent with the more detailed projects in the Infrastructure Delivery Plan which accompanies the Exeter Plan.

Activity and work undertaken

- 11.3. There has been consistent and ongoing cooperative work undertaken throughout the course of preparing the Exeter Plan. This has included a few key activities.

- **Exeter Housing and Economic Land Availability Assessment (HELAA): Three phases to inform the outline draft, full draft and publication draft of the Exeter Plan**

The site appraisal process involved seeking comments from Devon County Council (local transport network), National Highways (strategic road network), NHS, South West Water, the Environment Agency and internal City Council officers. These organisations fed infrastructure comments into the site assessment which informed the selection of potential allocations for the Exeter Plan.

- **Infrastructure Delivery Plan: Two phases to inform the full draft plan and publication draft of the Exeter Plan:**

The preparation of the IDP has been an iterative process which has also linked in with the drafting of policies in the Plan. During the preparation of the IDP, meetings and correspondence have been held (some on an ongoing basis) with the following organisations during 2023 and 2024:

- Exeter City Council: Green infrastructure, open space, leisure, sport, heritage assets, flood risk, energy and waste management;
- Devon County Council: Transportation, education, youth services, libraries, waste management, extra care housing, adult social care and children's services;
- Highways England: Transportation;
- Environment Agency: Flood risk;
- National Health Service via the Integrated Care Board: Health care;
- South West Water: Waste water treatment and water supply;
- National Grid: Electricity supply and generation;
- Devon and Cornwall Police: Police infrastructure;

- The University of Exeter: Higher education; and
- Exeter College: A wide range of education.

The most significant discussions were held with Devon County Council. During 2024, regular meetings were held every three weeks. These sessions were supplemented by particular discussions regarding education provision.

Sport England and various sports governing bodies also fed into an associated playing pitch strategy.

- **Viability:**
Discussions were held with some of the infrastructure organisations, in particular Devon County Council, to inform the viability appraisal and assumptions regarding developer contributions related to infrastructure needs. The assumptions in the viability appraisal were supported by a workshop held jointly to cover Exeter and East Devon.
- **Plan drafting:**
Taking forward work on the IDP, further specific discussions were held with Devon County Council regarding transport and infrastructure to add and amend policy content and supporting text. Discussions were also held with East Devon District Council to agree a consistent policy and supporting text regarding infrastructure planning and policy for the Topsham area where development closely aligns on both sides of the Council boundary.

Associated evidence

11.4. The discussions set about resulted in the following studies informed by cooperative working:

- Infrastructure Delivery Plan;
- Viability appraisal;
- Housing and Employment Land availability Assessment; and
- Playing pitch strategy.

Policy outputs

11.5. Discussions and evidence relating to cross-boundary infrastructure issues have informed the drafting of a series of policies in the Exeter Plan. These are:

- IF1: Delivery of infrastructure;
- IF2: Viability;
- IF3: Community facilities;
- IF4: Open space, play areas, allotments and sport;
- Allocation policies SBA1-5; and
- T11: Topsham Infrastructure Delivery Framework.

2025 Update: publication to submission

11.6 Additional Duty to Cooperate activity has been undertaken between publication and submission of the Exeter Plan during 2025. This includes:

- Additional discussions and meetings with: Devon County Council, South West Water, National Grid, Sport England and wider planning discussions with the NHS.
- Additional evidence for the Exeter Plan which have been informed by cooperation:
 - Devon County Council-prepared education evidence Base Report;
 - Exeter City Council-commissioned education study;
 - Updated Infrastructure Delivery Plan;
 - Agreement to part fund a Built Sports Facilities Strategy.
- Statements of common ground agreed with:
 - Devon County Council;
 - National Grid Transmission;

Statements of common ground currently under discussion with:

- Sport England;
- National Grid Distribution;

Summary position on submission of the Exeter Plan

Outstanding strategic cross-boundary issues relating to infrastructure and community facilities:

None

11.0 Summary and future work

- 11.1. This statement has provided a summary of the cross-boundary planning issues facing Exeter and the wider area. It has explained the nature of the discussions and activity which has taken place relating to these issues to support the Exeter Plan from the start of plan preparation through to submission, set out the evidence produced and identified the policies which have been informed by the joint work.
- 11.2. A series of statements of common ground have been produced to support the submission of the Exeter Plan. Further statements or revisions could be prepared in the period to the Plan Examination.

Appendix A: List of statements of common ground on submission

Agreed

ECC and Devon County Council
ECC and East Devon, Mid Devon and Teignbridge District Councils (housing)
ECC and East Devon District Council
ECC and Mid Devon District Council
ECC and Teignbridge District Council
ECC and Torbay Council
ECC and Environment Agency
ECC and Natural England
ECC and Historic England
ECC and National Highways
ECC and National Grid (Transmission:)

Still in preparation

ECC and Sport England
ECC and National Grid (Distribution)