

Exeter Plan

Hearing statement

Matter 11: Natural Environment

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Exeter City Council
Civic Centre
Paris Street
Exeter,
EX1 1JN



Table of Contents

1.	Introduction.....	3
Q1.	What are Landscape Setting Areas and Valley Parks and what is the justification for their inclusion in the Plan?	4
Q2.	How do they differ from site allocations? How were the areas and parks identified? Were alternatives considered and/or discounted?	6
Q3.	How would the Landscape Setting Areas and Valley Parks designations be expected to operate? How would a decision-maker be expected to react to a proposal for development within one of these locations?	7
Q4.	Would all the Landscape Setting Areas and Valley Parks identified by Policies NE1 and NE2 be classified as 'valued landscapes' for the purposes of paragraph 180a) of the Framework? If so, what is the evidence to justify this approach?	8
Q5.	Are the requirements set out in policies NE1 and NE2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	9
Q6.	In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	9
3.	Issue 2: Biodiversity and Green Infrastructure	11
Q1.	What is the justification for biodiversity net gain requirement in Policy NE3? What information is available to demonstrate that the target can be achieved? Has this requirement been adequately tested to ensure that it is viable and deliverable?	11
Q2.	Are the requirements for set out in policies NE3 and NE4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	11
Q3.	Are policies NE3 and NE4 positively prepared, justified, effective and consistent with national planning policy?	12
Q4.	In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	12
4.	Issue 3: Green Circle, Urban Greening and Trees	13
Q1.	Are the requirements set out in policies NE6 and NE7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	13
Q2.	Are policies NE5, NE6 and NE7 positively prepared, justified, effective and consistent with national planning policy?	14
Q3.	In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	14
5.	Summary	15

1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 11.
- 1.2. This statement covers Matter 11 as follows:
 - Issue 1 - Landscape Setting Areas and Valley Parks
 - Issue 2 - Biodiversity and Green Infrastructure
 - Issue 3 - Green Circle, Urban Greening and Trees

2. Issue 1: Landscape Setting Areas and Valley Parks

Q1. What are Landscape Setting Areas and Valley Parks and what is the justification for their inclusion in the Plan?

- 2.1. The Landscape Setting Areas and the Valley Parks are designations that identify land that performs particular functions that are key to delivery of the Exeter Plan vision and spatial strategy. National policy requires the Plan to set out the overall strategy for the pattern, scale and design quality of places (NPPF: paragraph 20). The Landscape Setting Areas and Valley Parks are an intrinsic part of a coherent spatial strategy to shape the growth of Exeter, protecting its distinctive character and identity and complementing the emphasis on regenerating brownfield sites and creating vibrant neighbourhoods within Exeter's settlement boundary.
- 2.2. The evidence documents support the case for these designations.

Landscape Setting Areas

- 2.3. Landscape Setting Areas are areas of valued landscape that enhance the natural and local environment. Since at least 1993 Exeter's development plan has included policies designed to protect the landscapes that define Exeter's setting. The approach taken to Landscape Setting Areas in policy NE1 is consistent with paragraphs 20, 124b, 180 and 181 of the NPPF which require plans to set an overall strategy for the pattern, scale and design of places, conserve and enhance the natural environment including landscapes and green infrastructure, recognise the functions performed by undeveloped land and take a strategic approach to maintaining and enhancing networks of habitat and green infrastructure.
- 2.4. The Exeter Landscape Sensitivity Assessment (LSA) (EVB-NE-01a-e), Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02) and Green Infrastructure Strategy (EVB-NE-09e) evidence this.
- 2.5. The Landscape Setting Areas are central to Exeter's identity. The Exeter Skyline Study stresses this: 'Topography is key to the character of Exeter. The high points upon which the Cathedral and Castle sit, as well as the surrounding valleys and high grounds, form important viewpoints into and out of the city. The hills surrounding the city provide the vital landscape setting for Exeter, which is hugely significant in terms of its landscape sensitivity and development strategy' (EVB-HH-02: page 22).
- 2.6. The Landscape Setting Areas protect valued landscapes, provide the strategic scale network of green infrastructure that provides the spatial context for Exeter, provide the green backdrop for key heritage assets and contain high quality agricultural land and areas of nature conservation importance (CSD-02, paragraphs 10.4 to 10.7).
- 2.7. The supporting text to policy NE1 sets this out and concludes that 'Overall, this land provides the landscape setting for the city and for surrounding areas. It is the combination of these roles, qualities and their importance to the local population which establishes this land as a distinctive and valued landscape

requiring protection from inappropriate development' (CSD-02: paragraph 10.6).

- 2.8 Policy NE1 protects and enhances these areas by permitting development where there will be no harm to Exeter's landscape setting and the delivery of the spatial strategy, to be assessed against the areas' distinctive characteristics, special features and qualities. These are listed in the supporting text (CSD-02: paragraph 10.9).

Valley Parks

- 2.9 Valley Parks are valued landscapes that are all within, or immediately adjacent to, the urban area, that (as well as providing landscape setting) also provide the following key functions:

- Provision of opportunities for informal recreation
- Areas of tranquillity and
- Access to nature.

- 2.10 The approach taken to Valley Parks in policy NE2 is consistent with paragraphs 20, 96, 97, 102, 124b, 180, 181, and 191 of the NPPF which require plans to set an overall strategy for the pattern, scale and design of places, conserve and enhance the natural environment including landscapes and green infrastructure, support healthy lifestyles, meet community needs and provide access to open spaces and opportunities for sport and physical activity, recognise the functions performed by undeveloped land and take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

- 2.11 Evidence is provided by the Green Infrastructure Strategy (EVB-NE-09e), Evidence to support NE2: Valley Parks (EVB-NE-03), Recognising and capturing the Suitable Alternative Nature Greenspace potential of the Valley Parks (EVB-NE-05) and the Devon Local Nature Recovery Strategy (EXM-02n).

- 2.12 The Valley Parks provide direct access to nature for much of the population of the urban area, providing the green lungs of the city that are vital to support physical and mental health (publications such as such Natural England's 'Space for Nature'¹ and 'Outdoors for All'² make these benefits clear). The Government's recent commitment to ensure everyone has access to green or blue spaces within a 15-minute walk from their home as part of the Environmental Improvement Plan 2025³, together with Natural England's Strategy 'Recovering Nature for Growth, Health and Security'⁴, focus minds on how important this access is to supporting development, economic growth and a healthy society.

- 2.13 The Valley Parks were, in the main, identified and brought into existence in Exeter in the 1980s. Since 1993, Exeter Local Plans have maintained this designation and associated protection. The current Exeter Local Plan First

¹ [A Space for Nature - IN46](#)

² [APPG Outdoors For All Recommendations to Government on Access to Nature online \(1\).pdf](#)

³ Environmental Improvement Plan 2025 – Chapter 5: Access to Nature: [Environmental Improvement Plan \(EIP\) 2025 - GOV.UK](#)

⁴ [Natural England's Strategy: Recovering Nature for Growth, Health and Security - GOV.UK](#)

Review (SUP-DPD-02: pages 61-63) and the Core Strategy (SUP-DPD-01: pages 54 and 59) continue to protect the Valley Parks, many of which are managed and maintained by Devon Wildlife Trust.

- 2.14 Exeter's Valley Parks will become even more important as we go forward with the Exeter Plan strategy. High density living is suitable for many (not just young adults, but families and the elderly), but without access to nature, areas of tranquillity and areas for informal recreation, this type of development is unlikely to be sustainable (children in particular need opportunities close to home where they can easily and safely turn up and play).
- 2.15 The Valley Parks also form a key part of the Green Infrastructure Strategy (providing all five of Natural England GI Framework benefits⁵), are of significant wildlife value, can deliver Suitable Alternative Natural Greenspace (SANG) and contribute to the delivery of the Devon Local Natural Recovery Strategy (see paragraph 10.10 of the supporting text to policy NE2).
- 2.16 Policy NE2 seeks to protect the Valley Parks and only permit appropriate development that does not harm the key purposes for which the Valley Parks are designated.

Landscape Setting Areas and Valley Park designations

- 2.17 Both designations are key to delivering the Exeter Plan vision and spatial strategy. They are a key part of the spatial strategy, which sees the setting of the city protected whilst placing a focus on sustainable, high quality, higher density urban living and creating vibrant neighbourhoods within Exeter's settlement boundary. They provide the GI, recreation, biodiversity, connections to nature and landscape setting that help deliver the built development. This is entirely in accordance with the Government's emerging brownfield/sustainable development 'presumption', which introduces a locational-based presumption that supports development inside settlements (Draft NPPF policy S4, December 2025⁶) while restricting it outside (Draft NPPF policy S5, December 2025).

Q2. How do they differ from site allocations? How were the areas and parks identified? Were alternatives considered and/or discounted?

- 2.18 The Landscape Setting Areas and Valley Parks are designations, rather than allocations, and the associated criteria-based development management policies (NE1 and NE2) determine how applications for development within these areas will be determined. The designations sit alongside the site allocations and together they are central to delivering the vision and spatial strategy.
- 2.19 The Landscape Setting Areas were identified through an assessment of all strategic scale areas of landscape within and outside the urban boundary. Evidence is provided in the Exeter Landscape Sensitivity Assessment (LSA) (EVB-NE-01a) and the Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02). All the areas covered by the Landscape Setting Area designation in the Plan meet the high bar required to justify their protection (high or high/medium sensitivity and assessed as meeting the

⁵ [Green Infrastructure Principles](#)

⁶ [National Planning Policy Framework: draft text for consultation](#)

criteria for valued landscape in line with best practice and industry standards⁷). Those areas that do not meet this high evidential requirement are proposed as development allocations in the Exeter Plan.

- 2.20 Over time, many areas around Exeter have gradually and proactively been released through greenfield allocations (particularly the Newcourt, Monkerton and Hill Barton and Alphington strategic allocations in the Core Strategy). This helps to explain why remaining areas of landscape meet the high evidential bar required to justify their protection.
- 2.21 The Valley Parks were, in the main, identified and brought into existence in the 1980s. Since 1993, Exeter Local Plans have maintained this designation and associated protection. Over the years, decisions have been upheld at appeal which have ensured the Valley Parks' continued existence and protection. New Valley Park areas have been identified through consultation with other departments within the Council, the public and external partners including East Devon District Council and Devon Wildlife Trust (see EVB-NE-03 for evidence relating to the new Valley Parks).
- 2.22 For the Valley Parks and the Landscape Setting Areas there are no alternatives; they are a physical, geographic and spatial reality on the ground.

Q3. How would the Landscape Setting Areas and Valley Parks designations be expected to operate? How would a decision-maker be expected to react to a proposal for development within one of these locations?

- 2.23 Policies NE1 and NE2 are decision-making policies that set out how proposals for development within the designations will be assessed. Decision makers will assess proposed development against the policies and make development management decisions accordingly.

Landscape Setting Areas

- 2.24 In the case of Landscape Setting Areas, the decision maker will consider if a proposed development will harm Exeter's landscape setting by applying the criteria in policy NE1 (with reference to the Landscape Sensitivity Assessment and any Landscape and Visual Impact Assessment (LVIA) evidence submitted by the applicant).
- 2.25 Paragraph 10.9 of the supporting text to policy NE1 clearly lists the distinctive characteristics, special features and qualities against which certain forms of development proposed within Exeter's Landscape Setting Areas must be assessed. The decision maker will, as ever, apply professional judgment and also consider all other material considerations.

Valley Parks

- 2.26 In the case of Valley Parks, the decision maker will consider whether the proposed development will make a meaningful contribution to at least one of the following as set out in policy NE2:

⁷ Landscape Institute Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations (TGN 02/21). Guidelines for Landscape and Visual Impact Assessment, 3rd Edition 2013 (GLVIA3).

- Informal outdoor recreation
- SANG
- Nature conservation and ecological enhancement
- Enhancements to active travel
- Environmental education
- Managing flood risk and other forms of climate resilience, or
- Achieving net zero.

2.27 In addition, the decision maker will need to consider if there will be unacceptable harm to the key purposes for which the Valley Parks are designated (i.e. provision of opportunities for informal recreation, areas of tranquillity and access to nature). The decision maker will, as ever, apply professional judgment and also consider all other material considerations.

Landscape Setting Areas and Valley Parks

2.28 These two designations partially overlap, with the Landscape Setting Area designation covering all the Valley Parks. Therefore, some applications will need to be determined in relation to both policies (NE1 and NE2) and indeed other policies in the Exeter Plan may also be relevant.

Q4. Would all the Landscape Setting Areas and Valley Parks identified by Policies NE1 and NE2 be classified as ‘valued landscapes’ for the purposes of paragraph 180a) of the Framework? If so, what is the evidence to justify this approach?

2.29 Yes, all the Landscape Setting Areas and the Valley Parks (which are also covered by the Landscape Setting Areas designation) are classified as ‘valued landscapes’ for the purposes of paragraph 180a of the NPPF. The Exeter Landscape Sensitivity Assessment (LSA) (EVB-NE-01a-e) and Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02) evidence this.

2.30 The LSA (EVB-NE-01a-e) describes the landscape value and sensitivity of land parcels within and around the city and provides the key evidence for the areas designated in policy NE1. The Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02) supplements the LSA and presents a structured analysis of the indicators of landscape value that contribute to the conclusion that areas designated in policy NE1 are valued landscapes in the context of the NPPF paragraph 180a.

2.31 The evidence, which takes a robust approach based on best practice and industry standards⁸, demonstrates that whilst the landscapes surrounding and within Exeter vary considerably in their character, each area displays a unique range of characteristics that contribute to its special qualities and value, and which elevates it above ordinary countryside. These indicators of landscape value include sites and features that provide evidence of great time depth, revealing the historic development of the city, as well as land uses and habitats that are of importance to wildlife and nature recovery. Some indicators relate to publicly accessible vantage points that provide views of historic Exeter, and

⁸ Landscape Institute Technical Guidance Note 02/21 Assessing Landscape Value Outside National Designations (TGN 02/21). Guidelines for Landscape and Visual Impact Assessment, 3rd Edition 2013 (GLVIA3).

that place the city in its topographical setting. Many of the views available today have attracted artists for centuries. Other indicators include the provision of public access to areas of countryside and recreational assets close to the city, providing people with the opportunity to get close to nature, exercise and find places of relative tranquillity, supporting both physical and mental wellbeing.

Q5. Are the requirements set out in policies NE1 and NE2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

2.32 Policy NE1 is justified by robust, up to date evidence provided by the Exeter Landscape Sensitivity Assessment (EVB-NE-01a-e), Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02) and Green Infrastructure Strategy (EVB-NE-09e). The policy will be effective in protecting the valued landscape setting areas and is consistent with paragraphs 20, 124b and 180 and 181 of the NPPF (see also responses to questions 1-4 above).

2.33 Policy NE2 is justified by robust, up to date evidence provided by the Evidence to support NE2: Valley Parks (EVB-NE-03), the Green Infrastructure Strategy (EVB-NE-09e) and Recognising the capturing the Suitable Alternative Nature Greenspace potential of the Valley Parks and Devon Local Nature Recovery Strategy (EXM-02n). The policy will be effective in protecting the Valley Parks from inappropriate development and is consistent with paragraphs 20, 96, 97, 102, 124b, 180, 181, and 191 of the NPPF (see also responses to questions 1-4 above).

2.34 The requirements of policies NE1 and NE2 have been assessed in the Local Plan Viability Assessment (EVB-IF-01a: Appendix B, page 60). The assessment concludes that no additional allowances are necessary for these criteria-based development management policies.

Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

2.35 No main modifications are suggested to policy NE1. However, several additional minor modifications are proposed to the supporting text to ensure clarity in relation to the extent of the coverage of the policy (SAMM74), to insert reference to the Exeter Skyline Study (SAMM75), to insert reference to the Landscape Setting Areas – Valued Landscape Assessment (SAMM76), to ensure it is clear how neighbouring authorities should consider Exeter's landscape setting (SAMM77) and to ensure essential strategic infrastructure associated with allocated development is treated the same whichever administrative area it is located in (SAMM78) (CSD-03: pages 85-87).

2.36 The Schedule of Suggested Modifications (CSD-03: SMM67, page 28) suggests that the final paragraph of policy NE2 is amended to address the representation received by One Energy (C-01-10-NE2) and is required to ensure the policy is justified and effective in terms of delivery over the plan period.

2.37 Several additional/minor modifications are proposed to the supporting text to policy NE2, be clear that that the Clyst Valley park should link into the wider Clyst Valley Regional Park (SAMM79), to ensure the Plan references the

statutory protection afforded to SSSIs (SAMM80), to correct the reference to biodiversity net gain (SAMM81) and to add a reference to the latest bat and bird box guidance (SAMM82) (CSD-03: pages 88-89).

3. Issue 2: Biodiversity and Green Infrastructure

Q1. What is the justification for biodiversity net gain requirement in Policy NE3? What information is available to demonstrate that the target can be achieved? Has this requirement been adequately tested to ensure that it is viable and deliverable?

- 3.1 The approach to biodiversity net gain is justified by the statutory framework requiring biodiversity net gain, which was introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).
- 3.2 The 10% biodiversity net gain policy requirement in policy NE3 also accords with the NPPF which states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity' (paragraph 180) and that plans should 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity' (paragraph 185) and the Planning Practice Guidance which states that 'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified' ('Biodiversity net gain' paragraph 006).
- 3.3 The Council is already delivering biodiversity net gain in accordance with the statutory framework and is meeting reporting requirements (see The Biodiversity Duty Report: EXM-02af).
- 3.4 The requirements of policy NE3 have been adequately tested to ensure that they are viable and deliverable. The Local Plan Viability Assessment and addendum (EVB-IF-01a and EVB-IF-01b) allow for the costs of NE3 through allowances for s106 contributions, CIL and specific separate allowances for habitat regulations mitigation and BNG (EVB-IF-01a: table 4.13 and paras 4.35-4.36).

Q2. Are the requirements set out in policies NE3 and NE4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 3.5 Policy NE3 is justified by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) and by robust and up to date evidence in the Habitats Regulations Assessment of the Exeter Plan – Publication Draft (CSD-08), the Joint Habitats Sites Mitigation Strategy (EVB-NE-04), Recognising and capturing the Suitable Alternative nature Greenspace potential of the Valley Parks (EVB-NE-05) and Devon Local Nature Recovery Strategy (EXM-02n). Policy NE3 is also consistent with the NPPF which states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity' (paragraph 180) and 'plans should a) Identify, map and safeguard components of local wildlife-rich habits and wide ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping

stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity' (paragraph 181).

- 3.6 Policy NE4 is justified by robust and up to date evidence provided by The Green Infrastructure Strategy (EVB-NE-09e) and the Biodiversity Linkages map (EVB-NE-08). Policy NE4 is also consistent with the NPPF which states that plans should 'enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure (paragraph 96), 'Plans should:... take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure' (paragraph 181) and 'Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement' (paragraph 192).
- 3.7 The requirements of policy NE3 and NE4 have been adequately tested to ensure that they are viable and deliverable. The costs of NE3 are included within the allowances for s106 contributions, CIL, and specific separate allowances for habitat regulations mitigation and BNG (EVB-IF-01a: table 4.13 and paras 4.35-4.36). The costs of NE4 are covered by the allowances for s106 contributions and CIL (EVB-IF-01a: table 4.13).

Q3. Are policies NE3 and NE4 positively prepared, justified, effective and consistent with national planning policy?

- 3.8 Yes, policies NE3 and NE4 have been positively prepared working in close cooperation with Natural England who support both the policies in their Statement of Common Ground (DTC-03k, page 17). The policies are justified, effective and consistent with national planning policy (see response to question 2 above).

Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 3.9 No main modifications are proposed to policy NE3.
- 3.10 One main modification is proposed to policy NE4 to insert reference to improving existing green infrastructure (CSD-03: SMM68, page 28). This modification is necessary for soundness to ensure consistency with the NPPF paragraph 20, which requires the 'conservation and enhancement' of green infrastructure.
- 3.11 An additional/minor modification to the supporting text to policy NE3 has been suggested to ensure appropriate description and explanation of the biodiversity net gain hierarchy (CSD-03: SAMM81, page 88). Natural England's Statement of Common Ground welcomes this modification (DTC-03k: page 15).
- 3.12 Two additional/minor modifications are suggested to ensure the supporting text to policy NE3 references the statutory protection afforded to SSSIs (CSD-03: SAMM80, page 88) and to insert reference to additional guidance on bat and bird box provision (CSD-03: SAMM82, page 89).

4. Issue 3: Green Circle, Urban Greening and Trees

- Q1. Are the requirements set out in policies NE6 and NE7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?**

Policy NE6: Urban Greening

- 4.1 Policy NE6 is justified by Natural England's Urban Greening Factor for England – Development and technical Analysis (NERR132)⁹ and by The Urban Greening Factor (EVB-NE-07), which is a local evidence document.
- 4.2 Policy NE6 is consistent with the NPPF (paragraphs 159, 180 and 181) and Natural England's Green Infrastructure Framework – Principles and Standards for England which introduced five headline green infrastructure standards. The Urban Greening Factor (UGF)¹⁰ is a planning tool to improve the provision of GI, particularly in urban areas.
- 4.3 The requirements in policy NE6 have been adequately tested to ensure they are viable and deliverable. The Local Plan Viability Assessment (EVB-IF-01a: page 57, Appendix B) assesses the policy requirements and assumes that the costs are included in allowances for external works (plot & site infrastructure) and BNG. The Local Plan Viability Assessment - Addendum (EVB-IF-01b: page 8, paragraph 2.10) further explains that this judgement has been made with reference to the national and local evidence.

Policy NE7: Urban tree canopy cover

- 4.4 Policy NE7 is justified by the Forestry Commission's UK Urban Canopy Cover - Forest Research¹¹ and by Valuing Exeter's Urban Forest (EVB-NE-06) and the Tree and Woodland Strategy 2023- 2033 (EXM-02ah), which are local evidence documents. The Devon Tree and Woodland Strategy¹² and the Right Place Right Tree guidance¹³ (both produced by the Devon Local Nature Partnership) also support inclusion of the policy in the Plan.
- 4.5 Policy NE7 is consistent with the NPPF (paragraphs 136 and 180) and Natural England's Green Infrastructure Framework – Principles and Standards for England which introduced five headline green infrastructure standards. The Urban Tree Canopy Cover Standard¹⁴ has been developed by Natural England in collaboration with the Forestry Commission.
- 4.6 The requirements of policy NE7 have been adequately tested to ensure that they are viable and deliverable. The 'Local Plan Viability Assessment' (EVB-IF-01a: page 57, Appendix B) assesses the policy requirements and assumes that the costs are included in allowances for external works (plot & site infrastructure) and BNG.

⁹ [Urban Greening Factor for England – Development and Technical Analysis - NERR132](#)

¹⁰ [Urban Greening Factor Standard](#)

¹¹ [UK Urban Canopy Cover - Forest Research](#)

¹² [Devon Tree and Woodland Strategy - Devon Local Nature Partnership](#)

¹³ [Right Place Right Tree - Devon Local Nature Partnership](#)

¹⁴ [Urban Tree Canopy Standard](#)

Q2. Are policies NE5, NE6 and NE7 positively prepared, justified, effective and consistent with national planning policy?

- 4.7 Policies NE6 and NE7 have been positively prepared working in close cooperation with Natural England who support both the policies in their Statement of Common Ground (DTC-03k: page 18). The policies are justified, effective and consistent with national planning policy (see response to question 1 above).
- 4.8 Policy NE5 has also been positively prepared working in partnership with the Live and Move Team (put together as part of the Exeter and Cranbrook Sport England Local Delivery Pilot) and in close cooperation with Natural England who support this policy in their Statement of Common Ground (DTC-03k: page 17).
- 4.9 Evidence relating to the route of the Green Circle and its function is provided on the Live & Move website¹⁵ and the Council's Visit Exeter website¹⁶. The Live and Move Team run a Green Circle survey biennially; The Exeter Green Circle Awareness and Usage Survey Analysis: 2024 (EVM-02y) presents the most recent published findings from that survey. The 2025 survey has closed¹⁷.
- 4.10 The Live and Work Team continues to undertake work to encourage use of the Green Circle and has recently successfully applied for funding from the GWR Customer and Community Fund to deliver a project connecting the city's train stations with the Green Circle, encouraging visitors and citizens to use public transport rather than drive whilst being active and connecting with nature. The project team included the Council, GWR, Devon County Council, Devon Wildlife Trust and University of Exeter.
- 4.11 Policy NE5 seeks to protect this existing important green infrastructure asset. The policy is effective in doing this as development that adversely affects the function of the Green Circle, or its setting, will not be permitted. This approach is consistent with the NPPF (paragraph 104).

Q3. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 4.12 Main modification SMM69 is suggested to policy NE6 to replace the word 'achieve' with the word 'target'. This is needed for soundness to ensure consistency with Natural England's guidance on the urban greening factor (CSD-03: page 28).
- 4.13 No main modifications are suggested to policies NE5 or NE7.
- 4.14 No additional/minor modifications are suggested to policies NE5, NE6 or NE7.

¹⁵ [Exeter Green Circle - Live and Move](#)

¹⁶ [Exeter Green Circle - Visit Exeter](#)

¹⁷ [Green Circle Survey 2025 | Engage Exeter](#)

5. Summary

- 5.1 This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to matter 11 of the Exeter Plan Examination.
- 5.2 All questions associated with issues 1, 2 and 3 of matter 11 have been answered.