

Exeter Plan

Statement of Common Ground

Exeter City Council and National Highways

September 2025

Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN



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Appendix A: Strategic matters: Summary matrix

1 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. National Highways 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 National Highways 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 35 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 and helps to demonstrate that there has been joint working between Exeter City Council and National Highways since the outset of plan-making.
- 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.

Summary

- 1.6. The National Highways response provides a summary position which is set out below. More detail is provided and addressed through the Statement of Common Ground.

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>

‘National Highways broadly welcomes the overall direction of the Exeter Plan, with a vision to re-use brownfield sites close to the City Centre and maximise active travel and public transport use to reduce overall car use’.

We acknowledge that due to land availability constraints there is a need to work with neighbouring authorities to deliver future employment opportunities for Exeter residents. Significant development growth is planned across the Exeter travel to work area, with Exeter allocations indicated to result in a material uplift in traffic through M5 J30. We understand that much of this growth has already been accounted for by National Highways as part of previous planning decisions. Nevertheless, the addition of development growth from neighbouring authorities strengthens the need for an ambitious strategy to accommodate future travel demands across the Exeter travel to work area.

National Highways is committed to continue working with Exeter City Council, neighbouring planning authorities and Devon County Council on the development of a Greater Exeter Transport Strategy to address the cumulative travel demands of planned development in the Exeter travel to work area. The development of the Transport Strategy will continue to progress ahead of Examination. Whilst work to date has informed the current IDP, subsequent amendments are likely to be required to reflect agreed measures identified as part of the final Transport Strategy. This could include works to the SRN, which would be likely to require additional public funding. Nevertheless, the positive cross-boundary work to date provides confidence that the Plan can be considered sound, subject to the completion of this work and the successful implementation of Transport Strategy outcomes.

National Highway therefore recommends that the Exeter Plan should adopt a ‘monitor and manage’ approach, whereby the outcomes of the Greater Exeter Transport Strategy and implications for the operation of the SRN are monitored going forwards to inform future Local Plan reviews. The Transport Strategy should seek ambitious modal shift targets supported by investment in the provision for active travel, bus and rail travel, with a view to limiting the need for costly improvements to the SRN which may delay the build-out of planned development growth. We are therefore recommending that policies within the Exeter Plan are updated to include additional references to the Greater Exeter Transport Strategy, uncertainty over required infrastructure improvements and funding, and the need to comprehensively monitor future travel outcomes. These requirements should all inform future reviews of the Local Plan and associated infrastructure planning’.

2 Strategic matters: Spatial strategy

Broad summary of chapter content

- 2.1 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.
- 2.2 The spatial strategy chapter includes two policies:
- S1: Spatial strategy; and
 - S2: Liveable Exeter Principles.
- 2.3 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.
- 2.4 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 National Highways to the Regulation 19 Exeter Plan

- 2.5 Exeter City Council and National Highways have worked cooperatively on the preparation of the Exeter Plan through the ongoing strategic transport evidence base and through the three previous stages of draft plans.
- 2.6 This is reflected in their representations regarding the 'overarching principles' in the Exeter Plan as set out below.

Overarching Principles

National Highways recognises the 'Vision' underpinning The Exeter Plan is aligned with the 'Exeter Vision 2040' adopted in 2019. The Vision seeks to deliver a liveable and connected city, leading the way in terms of sustainability and activity levels. The proposed Spatial

Strategy is focussed on the redevelopment of brownfield sites close to the city centre and those located on transport routes to minimise the need to travel and facilitate sustainable modes. Further policies (RFC1 and RFC2) seek to protect and enhance the city centre, district centre and local centres thereby helping to reduce the need to travel, and seek to guard against the provision of town centre uses outside of established centres.

National Highways consider that the Vision and Spatial Strategy underpinning the Exeter Plan are complementary and welcome the intention to limit the need to travel and support local non-car accessibility to everyday services and facilities. National Highways also supports the ambition to make Exeter a net carbon zero city by 2030 as set out in Strategic Policy CC1. The dual impact of reducing the need to travel and maximising use of sustainable travel modes is particularly welcome given the potential to reduce discretionary travel by car.

Whilst the Spatial Strategy seeks to enable traditional and new forms of employment provision within the city, it also commits the City Council to work with neighbouring Councils to ensure that the employment needs of the wider functional area are met. An Economic Development Needs Assessment (EDNA) concluded that some of the future economic growth stimulated by the city will need to be accommodated in adjoining local authority areas. With future employment growth in the city fringe, the SRN will continue to be used for longer distance commuting and out-commuting to the city fringe is likely to become more prevalent. The location of major employment sites on the periphery of the city and to the east of the M5 could also limit the ability to utilise some existing facilities for active and sustainable travel, particularly rail’.

The National Highways representation also provides a summary of their position which states:

Summary

‘National Highways broadly welcomes the overall direction of the Exeter Plan, with a vision to re-use brownfield sites close to the City Centre and maximise active travel and public transport use to reduce overall car use’.

- 2.7 This high level representation covers a series of policies in the Exeter Plan providing an overarching narrative which demonstrates general support. No issues of soundness or legal compliance are identified in the representations regarding the spatial strategy.
- 2.8 The table below sets out the specific elements of the National Highways representations which relate to the spatial strategy.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position and suggested plan modification
Overarching principles	Vision and S1: Spatial strategy	National Highways recognises the 'Vision' underpinning The Exeter Plan is aligned with the 'Exeter Vision 2040' adopted in 2019. The Vision seeks to deliver a liveable and connected city, leading the way in terms of sustainability and activity levels. The proposed Spatial Strategy is focussed on the redevelopment of brownfield sites close to the city centre and those located on transport routes to minimise the need to travel and facilitate sustainable modes. Further policies (RFC1 and RFC2) seek to protect and enhance the city centre, district centre and local centres thereby helping to reduce the need to travel, and seek to guard against the provision of town centre uses outside of established centres.	Comment noted	Agreed	No modifications required

Overarching principles	Vision and S1: Spatial strategy	National Highways consider that the Vision and Spatial Strategy underpinning the Exeter Plan are complementary and welcome the intention to limit the need to travel and support local accessibility to everyday services and facilities.	Support welcomed.	Agreed	No modifications required.
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Overarching principles	S1: Spatial strategy	Whilst the Spatial Strategy seeks to enable traditional and new forms of employment provision within the city, it also commits the City Council to work with neighbouring Councils to ensure that the employment needs of the wider functional area are met. An Economic Development Needs Assessment (EDNA) concluded that some of the future economic growth stimulated by the city will need to be accommodated in adjoining local authority areas. With future employment growth in the city fringe, the SRN will continue to be used for longer distance commuting and out-commuting to the city fringe is likely to become more prevalent. The location of major employment sites on the periphery of the city and to the east of the M5 could also limit the ability to utilise some existing facilities for active and sustainable travel, particularly rail.	Comment noted. No modifications suggested in the representation.	Accept. Continue to monitor situation and address in subsequent and respective Local Plan reviews. As necessary, emerging evidence and recommendations from the Greater Exeter Transport Strategy should also be incorporated as part of the review process.	No modifications required.
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3 Strategic matters: Climate change

Broad summary of chapter content

- 3.1 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.
- 3.2 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 National Highways to the Regulation 19 Exeter Plan

- 3.3 National Highways provided a high-level representation regarding the strategic climate change policy included in the Exeter Plan. This is considered in the table below. No issues of soundness or legal compliance are identified in the representation regarding climate change.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position and suggested plan modification
Climate change	CC1: Net zero Exeter	National Highways also supports the ambition to make Exeter a net carbon zero city by 2030 as set out in set out in Strategic Policy CC1.	Support welcomed.	Agree.	No modifications required.

4 Strategic matters: Homes

Broad summary of chapter content

- 4.1 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.
- 4.1 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 National Highways to the Regulation 19 Exeter Plan

- 4.2 National Highways provided high-level representations regarding the housing policies included in the Exeter Plan. These are considered

in the table below. No issues of soundness or legal compliance are identified in the representations regarding housing.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position and suggested plan modification
Housing needs	H1: Housing requirement	The identified housing requirement is to deliver at least 12,840 new dwellings over the 20-year period 2021-2041. Strategic Policy H1 (Housing requirement) targets the delivery of 13,975 new dwellings over the same period, comprising completions and existing consents, proposed allocations and anticipated windfall provision. The targeted housing number and associated impact assessment provides flexibility over delivery and confidence that unforeseen impacts on the SRN will not occur as a result of unallocated sites coming forward. With planning consents in place for 5,289 new dwellings, Strategic Policy H1 seeks to deliver approximately 5,369 new dwellings on site	Comment noted	Agree. National Highways accept that cumulative Local Plan impacts and infrastructure requirements are best addressed via the Greater Exeter Transport Strategy, and continue to support the work being undertaken by the authorities. Whilst modelling of Exeter Local Plan allocations has demonstrated flow impacts for the SRN, it is acknowledged that some of this development has previously been accepted by National Highways, and any residual impacts need to be considered in the context of wider growth.	No modifications required

		allocations.			
Housing allocations	H2: Housing allocations and windfalls	The site allocations are set out in Strategic Policy H2. Proposed site allocations include Land at Old Rydon Lane, which is capable of accommodating 357 new dwellings, and St Bridget Nurseries which is capable of 350 dwellings. Both sites are within the A379 corridor and have the potential to increase traffic volumes via M5 J30. Smaller sites are also proposed for allocation in the Topsham area to the south of the M5 and will increase traffic demand on Clyst Road which meets with the A376 Sidmouth Road a short distance to the east of M5 J30. Coupled with employment proposals adjacent to Sandy Park, the Land at Old Rydon Lane site represents a long-standing development ambition for the Newcourt area, with a planning application (reference 14/1451/OUT) for up to 392 dwellings on the site submitted in 2014.	Comment noted	Agree.	No modifications required

		Whilst the application is currently awaiting determination by Exeter City Council, National Highways offered no objection and accepted the development would not have an unacceptable impact. The proposed residential allocations contained in Policy H2 have informed Devon County Council's modelling of the traffic impacts of The Exeter Plan. As previously noted, modelling work suggests material increases in traffic at M5 J30, principally associated with proposed allocations in the A379 corridor. Some of the forecast traffic flow increases at M5 J30 are associated with long-standing development ambitions, with proposed allocations in the Newcourt area carried forward from the current Local Plan and dating back to previous improvements at M5 J30. Nevertheless, with M5 J30 being located on the City Council boundary, the			
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		modelling evidence highlights the issue of cross-boundary travel between Exeter and neighbouring authorities.			
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5 Strategic matters: Economy and jobs

Broad summary of chapter content

- 5.1 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.
- 5.2 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 National Highways to the Regulation 19 Exeter Plan

- 5.3 National Highways provided high-level representations regarding the economy section and policies in the Exeter Plan. This is considered in the table below. No issues of soundness or legal compliance are identified in the representation and there is in-principle support for the overarching approach in the plan regarding employment provision.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position and suggested plan modification
Employment land	EJ2: Retention of employment land	Within the context of the employment land constraints identified within the Spatial Strategy and supporting EDNA, National Highways welcomes the inclusion of Strategic Policy EJ2 (Retention of employment land) which seeks to protect established employment areas from redevelopment for other uses.	Support welcomed.	Agree	No modifications required
Employment provision	EJ3: New forms of employment provision	National Highways also supports the objectives of Strategic Policy EJ3 (New forms of employment provision) which seeks to support the delivery of work hubs, collaborative workspace, and live-work schemes, contributing to a reduction in the need to travel.	Support welcomed	Agree	No modifications required

Employment allocations	EJ6: New transformational employment allocations	Strategic Policy EJ6 seeks to allocate three sites for transformational employment development, including 11 hectares of land on sites adjacent to IKEA and Sandy Park within the Newcourt area, accessed from the A379 to the west of M5 J30. Accessibility from M5 J30 is recognised as an attractive opportunity, but National Highways would expect equivalent access by active and sustainable travel modes to prevent against a reliance on the private motor vehicle. We understand that the Sandy Park site is carried forward from the adopted Local Plan. An application (23/1532/OUT) for up to 158 residential dwellings and up to 17,567sqm of commercial floorspace on the allocation site is currently awaiting determination by Exeter City Council. However, National Highways offered no objection to the application, in part due to evidence of reductions in slip road traffic demand at	Comment noted	Agree. See National Highways comments to policy H1: Housing allocations.	No modifications required
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		M5 J30 during the traditional commuter peak hours.			
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6 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

- 6.1 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.
- 6.2 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 National Highways to the Regulation 19 Exeter Plan

- 6.3 No representations were raised regarding retail and the future of our centres by National Highways at the Regulation 19 Publication stage.

7 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

- 7.1 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.
- 7.2 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 National Highways to the Regulation 19 Exeter Plan

- 7.3 National Highways provided a number of representations regarding the sustainable transport and communications chapter and policies in the Exeter Plan. No issues of soundness or legal compliance are identified in the representations regarding transportation and there is in-principle support for the overarching approach in the plan as set out below:

‘It is an objective of the Plan to deliver development in appropriate locations with high quality infrastructure to minimise the need to travel, maximise sustainable transport and support emerging forms of mobility to improve health, placemaking and to support Net Zero. We are supportive of the ‘Vision’ and Plan objectives, and will continue to work with the City Council and other stakeholder authorities to ensure

that the safe and efficient operation of the SRN for longer-distance travel and freight is not compromised by future employment provision in the city fringe’.

7.4 Joint strategic transport modelling and strategy is ongoing for the wider Exeter area including the City Council, East Devon, Mid Devon and Teignbridge District Councils alongside Devon County Council and National Highways. This has been ongoing for around 18 months and continues following the publication of the Regulation 19 Exeter Plan.

7.5 The National Highway representations are considered in the table below.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position and suggested plan modification
Sustainable transport	STC1: Sustainable Movement	The Plan highlights the role which Exeter plays as a gateway to the national transport network. Draft Strategic Policy STC1 (Sustainable Movement) sets out a series of outcomes required to support the objective to be a Net Zero city by 2030 and to support the sustainable growth and accessibility of Exeter and the wider area. Outcomes include ensuring safe travel, and the protection and enhancement of the function of Exeter as a strategic rail, bus/coach, road and air hub through	Comment noted. The City Council recognises the importance of the strategic transport modelling and emerging study as referenced in paragraph 9.5. Additional text is suggested for inclusion at the end of Policy STC1 as follows: ‘Contributions towards mitigation will be sought as appropriate in accordance with the Local Transport Plan 4, Exeter Transport Strategy and emerging	Welcome reference to appropriate strategies and studies. Agree proposed amendment.	Include additional text at the end of Policy STC1 as follows: ‘Contributions towards mitigation will be sought as appropriate in accordance with the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study’.

		investment in critical infrastructure and improvements to sustainable connections to these hubs. Given the identified outcomes of the policy, it is suggested that reference could also be made to the delivery of the Greater Exeter Transport Strategy.	Greater Exeter Transport Study'.		
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The transport hierarchy	STC2: The transport hierarchy	The recognition of the potential need for physical improvements to the capacity of the highway network is an important element of draft Strategic Policy STC2 (The Transport Hierarchy) and is welcomed by National Highways. The draft policy advises that highway enhancements will only be supported where they do not cause unacceptable harm to the local natural, built or historic environments, and where they are necessary to improve highway safety, reduce car journeys, or where severe impacts cannot be avoided by investment in active and sustainable travel. National highways will continue to work with the FEMA authorities to ensure that the highway impacts of planned development growth are managed as far as practicable through the delivery of active and sustainable travel measures to avoid severe or unacceptable impact on	Comment noted. The City Council recognises the need to ensure the continuing functionality and safety of the strategic road network as development continue and Local Plans evolve. On this basis, a minor modification is suggested in a new paragraph after 9.13. 'The City Council will continue to work with our neighbouring Councils, Devon County Council and National Highways through the emerging Greater Exeter Transport Study to monitor and manage the cumulative transport impact of development through future Local Plan reviews'.	Welcome reference to ongoing collaborative working and appropriate strategies and studies. Agree proposed amendment.	Include a new paragraph after paragraph 9.13 as follows: 'The City Council will continue to work with our neighbouring Councils, Devon County Council and National Highways through the emerging Greater Exeter Transport Study to monitor and manage the cumulative transport impact of development through future Local Plan reviews.'
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		the SRN in line with policy set out in the DfT Circular and NPPF. Where a need for new highway infrastructure is identified as essential, then National Highways will work with the planning authorities and Devon County Council to seek to ensure that necessary infrastructure delivery keeps pace with development build out. We recommend this approach should inform future reviews of the Local Plan and should be reflected in references to monitoring transport outcomes and managing the future impacts of cumulative development.			
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The transport hierarchy	STC2: The transport hierarchy	Policy STC2 goes on to advise that contributions towards additional or improved transport provision will be sought where necessary. We recommend that supporting text should again make reference to the Greater Exeter Transport Strategy. With the Transport Strategy still being developed, there remains uncertainty over funding requirements. Whilst it is recognised that the IDP lists funding sources for currently identified transport improvements, there may well be a need to seek new funding. A commitment to seek funding from external sources where necessary would provide reassurance that identified measures are capable of being delivered and that the financial burden on development will not adversely impact on the provision of wider services and facilities.	Comment noted. The City Council recognises the importance of potential strategic transport infrastructure interventions to address the strategic development impacts. On this basis, a minor modification is suggested as follows to the end of paragraph 9.13 following on from the modification suggested above. 'Where necessary, external funding will be sought and agreed between respective parties to address development impacts'.	Welcome recognition of potential implications for delivery. Agree proposed amendment.	Include additional text at the end of paragraph 9.13 as follows: 'Where necessary, external funding will be sought and agreed between respective parties to address development impacts'.
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Active travel	STC3: Supporting active travel	Strategic Policy STC3 (Supporting Active Travel) seeks to encourage the use of active travel. The policy advises that the City Council will support improvements to the active travel network by addressing severance challenges associated with the SRN. Integrating active travel infrastructure with new employment opportunities delivered beyond the city boundary will be important to minimise out-commuting by car. National Highways would expect to be actively involved in any proposals that involve works to the SRN.	Comment noted. No revision is suggested. No modification is therefore suggested.	Agree	No modifications required
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Public transport	STC4: Supporting public transport	Strategic Policy STC4 (Supporting Public Transport) commits the City Council to work with other authorities and stakeholders to support public transport. A number of routes are referred to, including cross boundary services to Exeter Airport. We recommend that additional reference is made to cross-boundary service provision and the outcomes of the Greater Exeter Transport Strategy. Car-borne travel by Exeter residents to employment in areas such as Peamore (within Teignbridge) and the Exeter & East Devon Enterprise Area (largely within East Devon) has the potential to adversely impact the SRN. An integrated and ambitious approach is required to deliver a comprehensive public transport offering for these areas and new development that may come forward in the East Devon plan.	Comment noted. The City Council recognises the importance of cross-boundary public transport, including bus services. On this basis, a minor modification is suggested as follows to the end of paragraph 9.22: 'Taking account of the Local Transport Plan 4, Exeter Transport Strategy, and emerging Greater Exeter Transport Study, the City Council will work with Devon County Council and neighbouring authorities to improve bus provision through the Exeter Bus Service Improvement Plan (BSIP) and new development on a cross-boundary basis'.	Welcome recognition and commitment to cross-boundary working. Agree proposed amendment.	Include additional text at the end of paragraph 9.22 as follows: 'Taking account of the Local Transport Plan 4, Exeter Transport Strategy, and emerging Greater Exeter Transport Study, the City Council will work with Devon County Council and neighbouring authorities to improve bus provision through the Exeter Bus Service Improvement Plan (BSIP) and new development on a cross-boundary basis.'
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Travel planning	Policy STC6: Travel plans	Strategic Policy STC6 (Travel Plans) requires that all development proposals which generate significant transport impacts should be accompanied by a Travel Plan. It is noted that the adopted wording differs from that set out in paragraph 118 of the NPPF, which refers to development that will generate "...significant amounts of movement...". We recommend that the policy wording be amended to refer to significant movements rather than significant impacts given the emphasis on planning for active travel and non-car travel.	Comment noted. The City Council recognises the need to ensure Exeter Plan policy is in accordance with the NPPF. On this basis, a modification is suggested to the opening paragraph of policy ST6 as follows: 'All development proposals which generate significant amounts of movement transport impacts should be accompanied by a Travel Plan'.	Welcome	Amend the opening paragraph of policy ST6 as follows: 'All development proposals which generate significant amounts of movement transport impacts should be accompanied by a Travel Plan'.
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Travel planning	Policy STC6: Travel plans	Policy STC6 goes on to advise that "Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions". This is welcomed, but the policy contains no reference to monitoring the outcomes of the Travel Plan. We recommend that the policy should be strengthened to include a commitment to monitor the travel outcomes of development in line with paragraph 118 of the NPPF, particularly where this may impact on subsequent decisions in respect of transport improvements. The monitoring of transport outcomes is a key requirement for National Highways given the adoption of a vision-led approach and uncertainty over future requirements for highway improvements.	Comment noted. The City Council recognises the need to ensure Exeter Plan policy is in accordance with the NPPF. On this basis, a modification is suggested to the end of policy ST6 as follows: 'Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions. The outcomes of the travel plan measures will be monitored and reviewed, with the measures updated and actioned as appropriate'.	Welcome commitment to ongoing monitor and manage approach. Agree proposed amendment.	Include additional text at the end of policy STC6 as follows: 'Travel Plan measures should be included in an action plan and delivered by the developer or through financial contributions. The outcomes of the travel plan measures will be monitored and reviewed, with the measures updated and actioned as appropriate'.
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Safeguarding transport infrastructure	STC7: Safeguarding transport infrastructure	Strategic Policy STC7 (Safeguarding Transport Infrastructure) identifies a series of sites, routes, and structures safeguarded for future transport infrastructure. It is noted that the IDP identifies improvements at the A30 Ide roundabout and for the A376 Alphington Road entering the city. Work undertaken by Teignbridge Council identified a potential need to widen the Alphington Road to ease queuing back to the A30 Trunk Road. We recommend that Exeter City Council confirm whether land adjoining the Alphington Road corridor should also be safeguarded to accommodate any potential future physical widening.	Comment noted. The City Council recognises the need to clarify the position with regard to the potential widening of the A377 on the southern approach to Exeter. On this basis, a modification is suggested to add reference to this project in the list in policy STC7 as follows: ‘The following sites, routes and structures are safeguarded for retained, or future, transport infrastructure: i). Land for the widening of the A377 between Ide roundabout on the A30 and the junction of Alphington Road and Church Road’.	Welcome Identified sites, routes and structures should be reviewed following the completion of GETS and as part of the five-year review process to ensure that identified infrastructure needs are safeguarded and futureproofed. Agree proposed amendment.	Include additional text within policy STC7 as follows: ‘The following sites, routes and structures are safeguarded for retained, or future, transport infrastructure: i). Land for the widening of the A377 between Ide roundabout on the A30 and the junction of Alphington Road and Church Road’.
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Motorway service station	STC8: Motorway service area	Strategic policy STC8 (Motorway Service Area) gives support to the principle of redeveloping the existing Motorway Service Area (MSA) adjacent to M5 J30 for employment use, subject to the provision of an appropriate replacement. As the redevelopment of the site for employment use has not informed ongoing traffic modelling work the proposal would need to be supported by a full traffic assessment at a future point in time, to demonstrate any additional impacts and associated infrastructure needs not previously accounted for as part of the Greater Exeter Transport Strategy. We also recommend that the policy be strengthened to confirm that a suitable replacement MSA would need to be identified and open to traffic prior to any redevelopment.	Comment noted. The City Council recognises the need to for a new motorway service station to be open before the site of the current service area could be redeveloped. On this basis, a modification is suggested to the supporting text at the end of paragraph 9.37 as follows: 'The new motorway service area would need to be open before the closure of the existing facility'.	Welcome Agree proposed amendment.	Include additional text at the end of paragraph 9.37 as follows: 'The new motorway service area would need to be open before the closure of the existing facility'.
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- 7.6 In addition to the suggested modifications agreed between Exeter City Council and National Highways to address objections raised in the National Highways representation, a small number of other modifications relating to transport matters are suggested in response to other representations on the Regulation 19 Exeter Plan. These are documented below and have been reviewed by National highways:

Element of the Exeter Plan	Suggested modification	Response from National Highways
Sustainable movement. Paragraph 9.4	'Exeter has the second largest travel to work area in England. On that basis, A-addressing development and travel...'	Agree.
Sustainable movement. Paragraph 9.6	'...support growth, improve accessibility, reduce social exclusion, improve transport options for disabled groups and enhance the local environment.'	Agree.
Sustainable movement. Paragraph 9.6	'...then sets out a hierarchy which priorities active travel (walking, and-wheeling and cycling), public transport...'. Include additional definition for 'wheeling' in the glossary	Agree.
Sustainable movement. Paragraph 9.9	'...in the period up to 2041. In terms of the wider transport network, the City Council would support the potential future replacement of diesel trains with lower emission electric trains together with the move to electric vehicles on the road network'.	Agree.
The transport hierarchy. Policy STC2: The transport hierarchy For consistency with a representation on Policy STC3 (see below)	'The direct delivery of, or contributions towards, additional or improved transport provision will be sought where necessary'.	Agree.
The transport hierarchy. Paragraph 9.11	'... easier for people to walk, wheel, cycle, or use public transport...'	Agree.
Active travel proposals section Editorial modification	Amend sub heading of plan section: 'Active travel proposals'	Agree.

Active travel. Paragraph 9.14 Modification for plan consistency	'...meaning that active travel becomes a more attractive option. Scheme delivery will take account of the Local Transport Plan 4, Exeter Transport Strategy and emerging Greater Exeter Transport Study '.	Agree.
Active travel. Policy STC3: Supporting active travel	'Major development proposals must: d. Provide secure, enclosed parking or storage which can accommodate cycles, electric bikes, cargo bikes, adapted cycles, push chairs, mobility scooters and wheelchairs where appropriate '.	Agree.
Active travel. Policy STC3: Supporting active travel	' The direct delivery of, or contributions will be sought towards, new or improved active travel infrastructure in the city will be sought from the early phases of development and onwards '.	Agree.
Public transport. Policy STC4: Supporting public transport	'Provide new local multi-modal transport hubs and interchanges mobility hubs making best use of existing bus, rail and walking and cycling routes.	Agree.
Public transport. Policy STC4: Supporting public transport	'Large scale development proposals of one hundred homes or more and major commercial development must:...' 'The direct delivery of, or contributions, will be sought towards new or improved public transport services and/or infrastructure in the city will be sought and appropriately phased to provide high quality travel options early in the development balanced with efficiently supporting the long term future of the service'.	Agree.

Supporting more sustainable forms of car use. Policy STC5: Supporting more sustainable forms of car use	'Specific provision must be made in major developments for loading, unloading and deliveries together with access and parking for emergency services, medical staff and carers'.	Agree.
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8 Strategic matters: Natural environment

Broad summary of chapter content

- 8.1 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.
- 8.2 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 National Highways to the Regulation 19 Exeter Plan

- 8.3 No representations were raised regarding the natural environment chapter by National Highways at the Regulation 19 Publication stage.

9 Strategic matters: History and heritage

Broad summary of chapter content

- 9.1 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.
- 9.2 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 National Highways to the Regulation 19 Exeter Plan

- 9.3 No representations were raised regarding the history and heritage chapter by National Highways at the Regulation 19 Publication stage.

10 Strategic matters: Culture and tourism

Broad summary of chapter content

- 10.1 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.
- 10.2 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 National Highways to the Regulation 19 Exeter Plan

- 10.3 No representations were raised regarding the culture and tourism chapter by National Highways at the Regulation 19 Publication stage.

11 Strategic matters: High quality places and design

Broad summary of chapter content

- 11.1 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.
- 11.2 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 National Highways to the Regulation 19 Exeter Plan

- 11.3 No representations were raised regarding the high quality places and design chapter by National Highways at the Regulation 19 Publication stage.

12 Strategic matters: Health and wellbeing

Broad summary of chapter content

- 12.1 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.
- 12.2 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 National Highways to the Regulation 19 Exeter Plan

- 12.3 No representations were raised regarding the health and wellbeing chapter by National Highways at the Regulation 19 Publication stage.

13 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

- 13.1 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.
- 13.2 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 National Highways to the Regulation 19 Exeter Plan

- 4.3 National Highways provided a small number of representations regarding the infrastructure and facilities chapter in the Exeter Plan. These are considered in the table below. No issues of soundness or legal compliance are identified in the representation this chapter.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position
Infrastructure planning	Paragraph 15.4	We would also highlight that the third bullet point of supporting text in paragraph 15.4 makes reference to Highways England, and this should be updated to National Highways.	Comment noted. Given the inaccurate reference to 'Highways England' a minor modification is suggested to the third bullet point of paragraph 15.4 as follows: ' Highways England National Highways: Transportation'.	Welcome	Amend paragraph 15.4 as follows: ' Highways England National Highways: Transportation'.
Transport infrastructure funding	IF1: Delivery of infrastructure	Strategic Policy IF1 (Delivery of Infrastructure) requires the delivery of supporting infrastructure and community facilities, phased at the earliest practical and viable opportunity. It is stated that funding will be sought from the Community Infrastructure Levy and Section 106 Agreements to secure necessary infrastructure, facilities and services, including those identified in an IDP.	Comment noted. No modification required.	Agree	No modification required.

Transport infrastructure funding	IF1: Delivery of infrastructure	The Greater Exeter Transport Strategy is not yet finalised. The Strategy will need to inform revisions to the IDP, but there is no certainty that sufficient funding will be available from development to deliver all necessary measures. Should physical SRN works be required then it is likely that additional public funding will be necessary. We recommend that the policy should be expanded to refer to the Transport Strategy and seeking other sources of funding as necessary.	Comment noted. The City Council recognises the importance of the emerging Greater Exeter Transport Strategy and the potential need to secure funding for associated transport measures from a variety of sources. This is reflected in the suggested modifications to policy STC2. Given that the plan should be read as a whole, it is not considered necessary to suggest an alteration to policy IF1.	Accept	No modification required
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Viability	IF2: Viability	The potential for changes in infrastructure costs is reflected in Strategic Policy IF2 (Viability) which sets out a requirement for viability assessments and sets a framework for reviewing viability issues. The viability risks identified in Policy IF2 are pertinent given uncertainty over infrastructure costs and the potential need for highway improvements. National Highways supports the approach identified in the policy and would welcome joint-working with the City Council to manage this risk.	Comment noted. No modification required.	Agree.	No modification required
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14 Site allocations

Broad summary of chapter content

- 14.1 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.
- 14.2 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.
- 14.3 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 135 delivery throughout the Plan period.
- 14.4 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 National Highways to the Regulation 19 Exeter Plan

- 14.5 National Highways provided a small number of representations regarding the site allocations chapter in the Exeter Plan. These are considered in the table below. No issues of soundness or legal compliance are identified in the representations to this chapter.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position
Site allocations and applications	SBA1-5: Strategic brownfield allocations	The Plan includes Strategic Policies for five strategic mixed-use brownfield allocations and the Topsham Infrastructure Delivery Framework. Wider residential allocations and new transformational employment allocations are shown in map form. We would expect any future planning applications for significant development to be supported by a vision-led Transport Assessment/Statement and Travel Plan, detailing the transport vision for the site, monitoring arrangements, and contribution to the overarching transport strategy.	Comment noted. The representation does not seek a change to the plan. Given that national planning policy and practice guidance require appropriate transport assessments or transport statements, and that policy STC5: Supporting more sustainable forms of car use already makes reference to these documents, modifications are not considered necessary.	Agree	No modification required

Topsham infrastructure	TI1: Topsham Infrastructure Delivery Framework	Strategic Policy TI1 seeks to establish a delivery framework for new cross-boundary infrastructure to support proposed development north of Topsham within the Exeter and East Devon Local Plans. The policy is welcomed by National Highways, both in terms of the identification of a transport strategy to prioritise sustainable travel, and the proactive cross-boundary planning of future infrastructure requirements. Similar cross boundary considerations are likely to occur for the Peamore site allocation in the Teignbridge Local Plan, and for the Cranbrook and second New Community corridors with East Devon District Council. We recommend that the authorities seek to implement similar working arrangements for these areas to minimise any impacts for the SRN.	Comment noted. The City Council recognises the relationship between development on the edge of Exeter in neighbouring Districts and the city. There are existing working relationships and mechanisms to address these matters. The Exeter Plan does not itself propose to allocate development within the City Council boundary adjacent to the developments at Peamore, Cranbrook or the second new community outside the District. It would therefore be for the neighbouring District Local Plans to include such policy requirements. On this basis no modification is suggested to the Exeter Plan because it would not be possible to implement this outside the City Council boundary.	Accept. Reciprocal joint working arrangements will be bound into progress and agreement of the GETS. The ECC proposed modification to para 9.13 helps to address this point.	No modification required
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15 Monitoring and implementation

Broad summary of monitoring framework

- 15.1 The Exeter Plan includes a monitoring framework which covers statutory and additional indicators. These are arranged according to each chapter of the plan. Not all policies include monitoring indicators.
- 15.2 The monitoring framework will form the basis of the Authority Monitoring Report.

Addressing the response of National Highways to the Regulation 19 Exeter Plan

- 15.3 National Highways provided a small number of representations regarding the monitoring and implementation chapter in the Exeter Plan. These are considered in the table below. No issues of soundness or legal compliance are identified in the representations to this chapter.

Issue	Element of the plan	National Highways' representation	ECC comment	National Highways comment	Final position
Travel plan monitoring	Monitoring framework: Sustainable transport and communications	As previously noted, we recommend reference to the monitoring of development Travel Plans, particularly given the objectives of the Plan around active travel and reducing the need to travel.	Comment noted. The City Council has recognised this issue and has suggested a minor modification to STC6: Travel plans. On this basis no modification is suggested to the monitoring framework.	Accept	No modification required
Trip generation and mode-share monitoring	Monitoring framework: Sustainable transport and communications	It is also unclear how the goal of 50% of trips within the city being taken by active travel will be monitored. We understand that this is a shared ambition with Devon County Council, established within both the Exeter Transport Strategy and Local Transport Plan 4. Currently there is no reference to this ambition within plans to monitor implementation of the Exeter Plan.	Comment noted. The City Council does have an ambition for 50% of trips within the city to be undertaken by active travel, a shared ambition with the County Council. However, this is not included within a policy in the Plan specifically and is affected by a wide range of factors beyond planning policy. On this basis, no modification is proposed. However, the City Council will work with the County Council on their monitoring of this objective in relation to the implementation of the Local Transport Plan.	Accept – recognising proposed amendments to STC1.	No modification required

Public transport monitoring	Monitoring framework: Sustainable transport and communications	Similarly, whilst it is welcomed that the plan intends to undertake monitoring of bus and rail patronage in line with Strategic Policy STC4, no wider monitoring of enhancements in service provision or Park and Change use appear to be proposed. Examples of additional monitoring could include the delivery of new/extended bus services or increases in rail service frequency, to demonstrate a qualitative improvement in the public transport offer.	Comment noted. The City Council recognises that public transport improvements will be important in mitigating development impact and providing an alternative to car use. However, an indicator covering public transport is already included in the monitoring framework and this is considered to be sufficient in the context of a pragmatic and proportionate approach. It is also likely that other monitoring of public transport improvements will be undertaken by the County Council.	Accept. We acknowledge that the County Council will be undertaking monitoring for the Local Transport Plan, and we will recommend that the Greater Exeter Transport Study includes a suitable monitoring regime as appropriate. We would recommend that the 5-year review process draws on all available evidence to support a review of the effectiveness of plan policies and transport measures.	No modification required
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16 Sustainability Appraisal and Habitat Regulations Assessment

Explanation of the SA and HRA

- 16.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 16.2 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 National Highways to the Regulation 19 Exeter Plan

- 16.3 No representations were provided regarding the Sustainability Appraisal or the Habitat Regulations Assessment by National Highways at the Regulation 19 stage of the Exeter Plan.

17 Governance, review and signoff

- 17.1 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.
- 17.2 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: Head of City Development, Exeter City Council

Signed:



Name: Steve Havers

Position: Spatial Planner – Operations (South West), National Highways

Appendix A:**ECC and National Highways: Strategic matters summary matrix**

Strategic matters	Agreement (Y), or outstanding issues (at time of submission) (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
Monitoring and implementation	Y
Sustainability Appraisal	Y
Habitat Regulations Assessment	Y