

**Exeter Plan**

**Statement of Common Ground**

**Exeter City Council and National Grid Electricity  
Transmission**

September 2025

**Exeter City Council**  
Civic Centre  
Paris Street  
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## **1.0 Executive summary: List of outstanding issues**

- 1.1. All issues raised in National Grid Electricity Transmission's (NGET) representation dated 3<sup>rd</sup> February 2025 have been resolved and there are no outstanding issues.
- 1.2. NGET are no longer requesting to attend the examination of the Exeter Plan.

## 2.0 Introduction

- 2.1. 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.
- 2.2. 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.
- 2.3. National Grid Electricity Transmission (NGET) submitted a representation on the Regulation 19 Plan by email on 3<sup>rd</sup> February 2025. The matters raised are considered through this Statement of Common Ground.
- 2.4. This Statement of Common Ground demonstrates that the City Council and NGET have cooperated on strategic matters since the outset of plan-making 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 Framework<sup>1</sup>. 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.
- 2.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance<sup>2</sup> and meets the requirements of the Planning and Compulsory Purchase Act 2004<sup>3</sup> and the Localism Act 2011<sup>4</sup>.

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<sup>1</sup> 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>

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

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

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

### **3.0 Strategic matters: Spatial strategy**

#### **Broad summary of chapter content**

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

#### **Addressing the response of NGET to the Regulation 19 Exeter Plan**

- 3.5 No representations were raised regarding the spatial strategy chapter at Regulation 19 Publication stage.

## 4.0 Strategic matters: Climate change

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 4.3 No representations were raised regarding the climate change chapter at Regulation 19 Publication stage.

## 5.0 Strategic matters: Homes

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan:

- 5.3. No representations were raised regarding the 'Homes' chapter at Regulation 19 Publication stage. At the meeting between Exeter City Council and NGET held on Monday 1<sup>st</sup> September 2025, all parties agreed that no NGET assets are affected by proposed allocations in the Regulation 19 Exeter Plan.

## 6 Strategic matters: Economy and jobs

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 6.3 No representations were raised regarding the Economy and jobs chapter at Regulation 19 Publication stage. At the meeting between Exeter City Council and NGET held on Monday 1<sup>st</sup> September 2025, all parties agreed that no NGET assets are affected by proposed employment allocations in the Regulation 19 Exeter Plan.

## **7 Strategic matters: Retail and the future of our centres**

### **Broad summary of chapter content**

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

### **Addressing the response of NGET to the Regulation 19 Exeter Plan**

- 7.3 No representations were raised regarding the 'Retail and the future of our centres' chapter at Regulation 19 Publication stage.

## 8 Strategic matters: Sustainable transport and communications

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 8.3 No representations were raised regarding the 'Sustainable transport and communications' chapter at Regulation 19 Publication stage.

## 9 Strategic matters: Natural environment

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 9.3 No representations were raised regarding the 'Natural environment' chapter at Regulation 19 Publication stage.

## 10 Strategic matters: History and heritage

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 10.3 No representations were raised regarding the 'History and heritage' chapter at Regulation 19 Publication stage.

## 11 Strategic matters: Culture and tourism

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 11.3 No representations were raised regarding the 'Culture and tourism' chapter at Regulation 19 Publication stage.

## 12 Strategic matters: High quality places and design

### Broad summary of chapter content

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

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 12.3 NGET's representation raises the issue of the design approach that should be taken for development proposals on land that is crossed by NGET assets including high voltage overhead lines. The representation notes that NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.
- 12.4 NGET requests that, in order to ensure consistency with national planning policy, Policy D1: Design should include a policy strand such as: *"Take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."*
- 12.5 The representation draws attention to NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* and advises that it is NGET policy to retain existing overhead lines in-situ other than in exceptional circumstances (for example, where the proposal is of regional or national importance). The representation also draws attention to statutory safety clearances between overhead lines, the ground, and built structures, as detailed in NGET's *'Guidelines when working near National Grid Electricity Transmission assets'*.

- 12.6 At a meeting between the City Council and NGET on Monday 1<sup>st</sup> September 2025, it was agreed by all parties that the policy text for Policy D1 in the Publication Draft Exeter Plan (Regulation 19) sufficiently addresses NGET's requirements and that no modifications were considered necessary.
- 12.7 It was also agreed by all parties that no NGET assets are affected by the proposed allocations in the Exeter Plan.
- 12.8 The NGET guideline documents are referred to for information purposes and this is welcomed by the City Council. No modifications to policy text or supporting text are considered necessary in relation to this.
- 12.9 Table of responses and ways forwards:

| Issue                          | Element of the plan (policy or paragraph) | Organisation's representation                                                                                                                                                                                                                                                                                      | ECC comment                                                                                                                                                                                                                                                                                                                 | Organisation's comment                                                                                    | Final position             |
|--------------------------------|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------------------|
| High quality places and design | Policy D1                                 | <p>"To ensure that proposed Design Policy D1 is consistent with national policy NGET request the inclusion of a policy strand such as:</p> <p><i>"Take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."</i></p> | <p>Criterion L of Policy D1 requires that development proposals:</p> <p><i>"Adopt a comprehensive response to existing site constraints, utilities and infrastructure provision."</i></p> <p>The requested policy strand is therefore sufficiently addressed within the policy text, and no modifications are required.</p> | <p>NGET agrees that Policy D1 sufficiently meets NGET's needs and that no modifications are required.</p> | No modifications required. |

## **13 Strategic matters: Health and wellbeing**

### **Broad summary of chapter content**

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

### **Addressing the response of NGET to the Regulation 19 Exeter Plan**

- 13.3 No representations were raised regarding the 'Health and wellbeing' chapter at Regulation 19 Publication stage.

## **14 Strategic matters: Infrastructure and facilities**

### **Broad summary of chapter content**

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

### **Addressing the response of NGET to the Regulation 19 Exeter Plan**

- 14.3 No representations were raised regarding the 'Infrastructure and facilities' chapter at Regulation 19 Publication stage.

## 15 Site allocations

### Broad summary of chapter content

- 15.1 The Exeter Plan allocates a series of sites for development. The site allocations (included in Policies H2 and EJ6) have been selected in accordance with the spatial strategy for the city set out in Policy S1.
- 15.2 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located close to the city centre or key public transport hubs. The sites are identified in Policy H2 and were part of the original Liveable Exeter work.
- 15.3 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2. These make up the balance of our housing requirement and provide for choice and competition in the market. The majority of the sites are brownfield in line with the spatial strategy. Some of the sites are greenfield, these sites helping to provide a mix of development opportunities to enable housing 135 delivery throughout the Plan period.
- 15.4 Three employment sites are allocated in Policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.

### Addressing the response of NGET to the Regulation 19 Exeter Plan

- 15.5 No representations were raised regarding the 'Site allocations' chapter at Regulation 19 Publication stage. At the meeting between Exeter City Council and NGET held on Monday 1<sup>st</sup> September 2025, it was agreed that no NGET assets are affected by proposed allocations in the Regulation 19 Exeter Plan.

## **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.

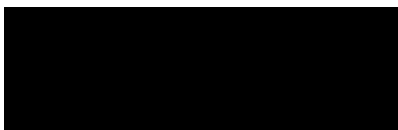
### **Addressing the response of NGET to the Regulation 19 Exeter Plan**

- 16.3 No representations were provided regarding the Sustainability Appraisal or the Habitat Regulations Assessment.

## 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:** Service Lead, City Development, Exeter City Council

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Signed:



**Name:** Rachel Hagan

**Position:** Development Liaison Support Officer, National Grid Electricity Transmission

**Appendix A:****ECC and National Grid Electricity Transmission: Strategic matters summary matrix (relating to Exeter Plan, not evidence)**

| <b>Strategic matters</b>                 | <b>Agreement (A), Agreement with suggested modification (AM) or outstanding issues (X)</b> |
|------------------------------------------|--------------------------------------------------------------------------------------------|
| Spatial strategy                         | A                                                                                          |
| Climate change                           | A                                                                                          |
| Homes                                    | A                                                                                          |
| Economy and jobs                         | A                                                                                          |
| Retail and the future of our centres     | A                                                                                          |
| Sustainable transport and communications | A                                                                                          |
| Natural environment                      | A                                                                                          |
| History and heritage                     | A                                                                                          |
| Culture and tourism                      | A                                                                                          |
| High quality places and design           | A                                                                                          |
| Health and wellbeing                     | A                                                                                          |
| Infrastructure and facilities            | A                                                                                          |
| Site allocations                         | A                                                                                          |
| Sustainability Appraisal                 | A                                                                                          |
| Habitat Regulations Assessment           | A                                                                                          |