

Exeter Plan

Hearing statement

Matter 3:
Spatial Strategy and
Distribution of Development

February 2026

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



Contents

1.	Introduction.....	4
2.	Issue 1: Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2	5
Q1.	What is the justification for the requirement in Policy S2 for homes to be provided that are predominately dual aspect?.....	5
Q2.	Is the strategic approach of focussing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?	5
Q3.	How does Policy S2 relate to the Exeter St James Neighbourhood Plan and its principle of ‘community balance’?	8
Q4.	Does the distribution of development from allocations, commitments and completions since the start of the plan period reflect the overall spatial strategy set out in Policies S1 and S2?	8
Q5.	Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?	9
Q6.	What process did the Council follow to determine the distribution of this new development? Was this process robust and based on reasonable judgements about where to direct new development?.....	10
Q7.	Have Policies S1 and S2 been included within the Local Plan Viability Assessment and tested to ensure that they are viable and deliverable?	12
Q8.	Do the Liveable Exeter principles apply to greenfield development, or just large-scale brownfield developments?	13
Q9.	Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?	13
Q10.	Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints? ...	14
Q11.	Would an alternative distribution within the Plan area of the same amount of new development be likely to have significantly less impact on the strategic road network?	15
Q12.	For the plan to be sound, is it necessary for there to be additional evidence, at this stage, of the likely impacts of the new development proposed in the plan on junctions 29, 30 and 31 of the M5 and on the A30, A38 and A379 roads?	16
Q13.	In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?.....	16
3.	Issue 2: Employment Growth – Policy EJ1.....	18
Q1.	The Greater Exeter Economic Development Needs Assessment (EDNA) contains a baseline forecast of jobs growth for Exeter of around 13,500 new jobs over the period 2020-2040. The Employment and Jobs Topic Paper states that this will be exceeded with growth of about 14,900 new jobs over the plan period. Is this level of job growth realistic? How has it been calculated and how does it compare to other projections for employment in other parts of	

	Greater Exeter over the plan period? How does it compare to past performance?	18
Q2	How does the projected number of jobs compare to the supply of employment land and housing land? Could the projected number of new jobs (and thus homes and employment land needed) be higher?	19
Q3	What is the difference between the four economic growth scenarios set out in the evidence? Why does the Council consider the mid-point economic growth scenario to be the most appropriate baseline for plan making purposes?	20
Q4.	What is the justification for the suggested modifications to Policy EJ1? Why are they necessary for soundness?	20
4.	Summary	22

1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 3 which addresses the spatial strategy and distribution of development.
- 1.2. The statement is divided into sections which cover each of the following issues:
 - Issue 1: Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2
 - Issue 2: Employment Growth – Policy EJ1

2. Issue 1: Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2

Q1. What is the justification for the requirement in Policy S2 for homes to be provided that are predominately dual aspect?

- 2.1. Policy S2: Liveable Exeter principles applies to development at the strategic mixed-use brownfield allocations and elsewhere in terms of comprehensive regeneration (subject to suggested modification SMM2 as included in the Schedule of Suggested Modifications - CSD-03). Principle 4: Liveable buildings identifies that development will provide homes that are predominantly dual-aspect. This will help to provide high levels of natural daylight, ventilation and cooling, which are important determinants of health and wellbeing as identified in the National Design Guide (paragraphs 123, 124, 125, pages 38 and 39)¹. This is also consistent with the National Model Design Code: Part 1² (paragraph 56, i, page 28) which identifies the importance of lighting and aspect and Part 2³ (paragraph 161, page 66) which explains how this can be provided.
- 2.2. The consideration of dual-aspect homes is also consistent with the requirements of healthy homes set out in Government guidance on healthy homes⁴ (paragraph 7.4d4). This is reflected in policy H16: Residential amenity and healthy homes.
- 2.3. The policy is flexible because dual aspect homes are not an absolute requirement given that it states that homes should be 'predominantly' dual-aspect.

Q2. Is the strategic approach of focussing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?

Is the strategic approach of focussing development on brownfield land justified?

- 2.4. The NPPF (paragraph 123) states that policies in local plans should accommodate development 'in a way that makes as much use as possible of previously-developed or 'brownfield' land'. It goes on to state (paragraph 124c) that policies and decisions should '...give substantial weight to the value of using suitable brownfield land' and (paragraph 124, d) '...promote and support the development of under-utilised land and buildings'. Policy S1 has been prepared from a starting point of this position and is therefore consistent with national policy.
- 2.5. The Sustainability Appraisal (SA) was used to develop and assess the spatial strategy. The initial assessment was of four strategic policy options (EXM-02a: paragraph 4.2, page 76) as follows:
- Option A: Focus most development on large, strategic brownfield sites.

¹ Available at: [National design guide.pdf](#)

² Available at: [National Model Design Code: Part 1 - The Coding Process.](#)

³ Available at: [National Model Design Code: Part 2 - Guidance Notes](#)

⁴ Available at: [Healthy Homes — a foundation for healthier and resilient communities - GOV.UK](#)

- Option B: Focus on developing greenfield sites.
- Option C: Dispersal on smaller sites.
- Option D: Focus on public transport hubs and routes within the city.

2.6. Table 1 has been derived from the SA and summarises the total number of SA objectives likely to see positive, negative, mixed and uncertain effects as a result of pursuing each of the strategic options. In summarising the effects, all the components have been grouped. For example, all the objectives seeing significant and minor positive effects have been aggregated as positive effects. The same applies to the negative and mixed effects. Where there is an uncertain outcome, this has been included within the count for the positive, negative and uncertain results.

Strategic option	Total number of objectives seeing likely positive effects	Total number of objectives seeing likely negative effects	Total number of objectives seeing likely mixed effects
Option A: Focus most development on large, strategic brownfield sites	7	4	3
Option B: Focus on developing greenfield sites	0	10	4
Option C: Dispersal on smaller sites	3	9	2
Option D: Focus on public transport hubs and routes within the city	3	7	4

Table 1: Summary of SA assessment for the strategic options

- 2.7. From this summary, it is clear that the approach of focusing development on brownfield sites is an appropriate strategy, has taken into account reasonable alternatives and is based on proportionate evidence as included in the SA.
- 2.8. Further justification for the approach is derived from more detailed evidence which shows how the brownfield site allocations are deliverable. This evidence includes:
- The 4th Edition Housing and Economic Land Availability Assessment (EVB-H-02a);
 - The Urban Capacity Study (EVB-H-10a and EVB-H-10b);
 - The Exeter Urban Capacity Study Phase 2 (EVB-H-10d)
 - The Strategic Brownfield Sites Study EVB-H-09 ;
 - The Liveable Exeter Prospectus (EVB-S-01a);
 - The Exeter Plan Housing Trajectory (EVB-H-03);
 - Exeter Plan Delivery Schedule (EVB-H-06);
 - The Brownfield Developments in Exeter schedule (EVB-H-24).

- 2.9. The breadth of evidence shows that the approach of focusing development on brownfield sites is justified.

Are Policies S1 and S2 effective in this regard (focusing development on brownfield land)?

- 2.10. Policies S1: Spatial Strategy and S2: Liveable Exeter Principles, are effective in setting out the Plan's strategic direction of focusing high quality development on brownfield sites.
- 2.11. Policy S1: Spatial Strategy includes two key elements which specifically focus development on brownfield land: Points 4 and 5. These elements clearly steer development to strategic brownfield sites whilst enabling development on smaller brownfield sites as they become available.
- 2.12. Policy S2: Liveable Exeter Principles, applies to development on strategic brownfield sites, and, subject to suggested modification SMM2 (CSD-03), areas of regeneration opportunity elsewhere in the urban boundary. This will help to support high quality development.
- 2.13. The key diagram (CSD-02, page 169) provides a visual illustration of the spatial strategy's focus on brownfield land as per Policy S1. It also clearly demonstrates how focusing development on strategic sites runs in parallel with the landscape setting areas and valley parks on the sensitive land around the city.
- 2.14. Beyond Policies S1 and S2, it will also be the other policies in the plan that deliver the focus on brownfield development in more detail, flowing from the spatial strategy. Policy H2: Housing allocations and windfalls and Policy EJ6: New transformational employment allocations direct the majority of development to brownfield sites while Policy NE1: Landscape setting areas sets out the need to protect the landscape setting around Exeter due to its sensitivity.
- 2.15. On this basis Policies S1 and S2 are considered to be effective in focusing development on brownfield land.

What greenfield development opportunities are provided?

- 2.16. In terms of residential development, the Housing Topic (TOP-01: page 8, paragraph 2.25, bullet point 2) underlines the opportunities for greenfield development provided by the Exeter Plan to meet the NPPF requirements to identifying a sufficient supply and mix of sites (paragraph 69).
- 2.17. Alongside brownfield sites, Policy H2 allocates nine greenfield sites⁵ and 8 mixed sites. The nine greenfield allocations provide for 13% of the overall housing provision in Policy H2. Windfall development on greenfield sites within the urban boundary may also come forward under Policy H2. In addition,

⁵ Please note that TOP-01 incorrectly refers to 11 greenfield sites.

twenty-two major greenfield sites currently have planning permission for housing.

- 2.18. In terms of employment, Policy EJ6 includes three employment allocations. These total 15.5ha. Two of the three employment allocations are greenfield (Land adjacent to Sandy Park, Newcourt and Land adjacent Ikea, Newcourt) whilst the third, (St Luke's Campus, Heavitree Road) is brownfield. The two greenfield allocations provide 71% of the total employment land allocated in Policy EJ6 whilst the one brownfield site provides for 29%.

Q3. How does Policy S2 relate to the Exeter St James Neighbourhood Plan and its principle of 'community balance'?

- 2.19. The term 'community balance' is included in the St James Neighbourhood Plan (SUP-DPD-03: page 25). It derives from local concern regarding the impact of students on the area:

'...the very high proportion of people aged 18-24 and the impact of HMO conversions are leading to a lack of balance'.

- 2.20. The Neighbourhood Plan goes on to define community balance:

'The term 'community balance' therefore refers to the desire of the residents of St James to have a diverse population which includes people at all stages of their lives and which is not dominated by a single group of the population' (SUP-DPD-03, page 26).

- 2.21. Policy S2: Liveable Exeter Principles provides a set of high-level place-making principles, none of which mention 'community balance' or attempt to manage the nature of the local community associated with development proposals. Therefore, Policy S2 does not relate to the Exeter St James Neighbourhood Plan and its principle of 'community balance'.

Q4. Does the distribution of development from allocations, commitments and completions since the start of the plan period reflect the overall spatial strategy set out in Policies S1 and S2?

- 2.22. The data relating to allocations, commitments and completions since the start of the plan period does suggest that the distribution reflects the overall spatial strategy. The data provided below considers a potentially amended plan period running from 2022/23 to 2041/42 as per modification SMM1 in the Schedule of Suggested Modifications.

Commitments and completions

- 2.23. Commitments data as of the end of the most recent monitoring year (which runs until the end of March 2025) show permissions of 5,416. Of these permissions, 64% are on brownfield or mixed sites and 36% are on greenfield sites. This demonstrates a strong brownfield focus as per Policy S1.
- 2.24. Completions data for the first three years of the suggested, amended plan period cover 2022/23 to 2024/25. Total completions in these three years are 1,939. Of these, 1,177 (60.7%) are greenfield and 762 are brownfield or mixed (39.3%).

- 2.25. The distinction in the pattern between commitments and completions data may be expected. The spatial strategy is evolving as the City Council progresses from the spatial approach of the adopted Core Strategy (SUP-DPD-01: paragraph 4.11, page 18) which includes significant greenfield urban extensions to the east and southwest of Exeter (sites which are still building out) to the brownfield focus of the Exeter Plan. The completions, and to a lesser extent the permissions, necessarily reflect the existing Development Plan as opposed to the new Exeter Plan. As commitments are gradually implemented and become completions, and as new permissions are granted reflecting the brownfield focus, there will be a gradual evolution from the spatial approach in the Core Strategy to the spatial strategy of the Exeter Plan.

Allocations

- 2.26. Policy H2 allocates a total of 35 residential and mixed-use sites. Of these sites, 18 are brownfield, 9 are greenfield and 8 are mixed. Of the residential units expected to come forward on these 35 sites, 75% are on brownfield sites, 13% are on greenfield sites and 12% are on mixed sites. On this basis, the distribution of residential development for the allocations reflects Policy S1. NB, these figures are based upon the amended site capacities in suggested modifications SMM10 – 27 as included in the Schedule of Suggested Modifications (CSD-03).

Q5. Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

- 2.27. Yes, the distribution of growth is consistent with paragraph 109 of the NPPF. Exeter is a compact city with a tightly defined administrative boundary around the urban area. Accommodating development within the city minimises the need to travel as a starting point.
- 2.28. Policy S1: Spatial strategy includes specific elements which will focus development at locations which minimise the need to travel and offer modal choice - Points 4, 7, 8 all steer development in accordance with paragraph 109 of the NPPF. This approach is also shown in Policy S2: Liveable Exeter Principles, Principle 1 bullet point 3, 4, Principle 2 bullet point 1 and Principle 5 bullet point 3.
- 2.29. The Key Diagram (CSD-02, page 169) shows this visually with the majority of the allocations on brownfield sites, including on five strategic mixed use brownfield allocations close to the city centre and on key radial routes (which are the key public transport routes) and close to railway stations.
- 2.30. The map of allocations in the Submission Plan (page 136) shows the distribution of strategic brownfield allocations in the context of their proximity to the city centre and distance from the strategic road network.
- 2.31. In terms of residential development, the strategic mixed use brownfield allocations (SBA1-5) provide more than 3,000 dwellings in the plan period with good access to jobs, retail and other services due to their close proximity to the city centre. These sites are also mixed-use and will include employment, retail

and community provision. This mix of uses on site will help minimise the need to travel.

- 2.32. In terms of employment, the allocation at St Lukes is close to the city centre and on a key public transport route. The other employment allocations are close to residential areas and retail centres and are both within walking distance of railway stations. The centrally-located and well-connected strategic mixed use brownfield allocations will also bring forward employment.
- 2.33. Support for the spatial strategy has come from the two highway authorities; Devon County Council (DCC) and National Highways.
- 2.34. In their representation DCC state that:
- ‘Overall, Devon County Council supports Exeter City Council’s vision for sustainable transport, aiming to minimise car use while promoting active travel and public transport. This aligns with several of Devon County Council’s strategies, including the emerging Local Transport Plan 4’ (A-01, page 2).
- 2.35. In their representation, National Highways state that:
- ‘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’ (B-06, paragraph 21, page 9).
- 2.36. In summary, the distribution of development as set out in Policies S1 and S2 and the Key Diagram, and as taken forward by the allocations, is consistent with national policy in paragraph 109 of the NPPF.

Q6. What process did the Council follow to determine the distribution of this new development? Was this process robust and based on reasonable judgements about where to direct new development?

- 2.37. The distribution of development flows from the spatial strategy which itself stems from a starting point of national policy. The NPPF (paragraph 123) states that policies in local plans should accommodate development ‘in a way that makes as much use as possible of previously-developed or ‘brownfield’ land’. It goes on to state (paragraph 124c) that policies and decisions should ‘...give substantial weight to the value of using suitable brownfield land’ and (paragraph 124, d) ‘...promote and support the development of under-utilised land and buildings’. Policy S1 is consistent with national policy.
- 2.38. With national policy as the starting point, the spatial strategy and distribution of development was taken forward as an evolution from the spatial approach in the adopted Core Strategy (SUP-DPD-01) which identified the role of brownfield regeneration and greenfield urban extensions in accommodating development. Further work was undertaken on a Development Delivery Development Plan Document and the Greater Exeter Strategic Plan (GESP) covering the District Council areas of Exeter, East Devon, Mid Devon and

Teignbridge. These plans did not progress as far as adoption but they helped to inform initial strategy and development distribution work for the Exeter Plan.

- 2.39. To ensure that sufficient housing development could be accommodated to meet its own housing needs, the City Council embarked on the Liveable Exeter initiative in 2019; a transformational housing delivery programme to regenerate eight strategic brownfield sites as shown in the Liveable Exeter Prospectus (EVB-S-01a). Given a firm understanding of capacity constraints in the city, the Liveable Exeter initiative provides a bold approach to meeting housing needs, evolving from previous approaches allocating most development on large scale urban extensions as set out in the Core Strategy (SUP-DPD-01, Policy CP1, page 19). Five of the initial eight Liveable Exeter sites are included in some form as strategic brownfield allocations.
- 2.40. The City Council commissioned the Sustainability Appraisal which tested the four strategic policy options (EXM-02a, paragraph 4.2, page 76) as the basis of the spatial strategy. Within the Sustainability Framework against which Plan content was tested, objective 14 is 'to support efficient use of resources, including land, minerals and waste' (EXM-02a, pages 74 and 75). The first question considered in the assessment against this objective is 'Will the policy/option promote the re-use of previously development land'. The key elements of the spatial strategy have therefore clearly been tested by the SA.
- 2.41. Alongside the SA and Liveable Exeter work, the Council undertook call for sites processes, the first in 2020 and the second in 2023/2024 to identify sites for potential development. The sites which emerged were tested through the HELAA process as documented in the HELAA report (EVB-H-02a) which itself included an assessment of whether the sites are in accordance with the spatial strategy. The HELAA achievability assessment involved input from a number of experts in various fields (e.g. from Devon County Council in terms of highways and education, SWW, the Integrated Care Board) while the HELAA panel also enjoyed input from third parties (EVB-H-02a, paragraph 3.18, page 12).
- 2.42. In addition, all the sites for consideration were tested through the SA. As already set out, the SA included consideration of whether plan content (in this case the sites) will promote previously development land. All the sites taken forward are therefore clearly tested in both the SA and the HELAA for their role in helping to deliver the spatial strategy.
- 2.43. The various iterations of the Exeter Plan were subject to consultation, with the spatial strategy and the sites being consulted on three times. Amendments were made to the plan following consultation to ensure an appropriate spatial strategy and distribution of sites to meet that strategy. Sites were added and removed depending on comment regarding their characteristics, opportunities, challenges and availability/deliverability.
- 2.44. Finally, the distribution of sites was tested to check whether it is consistent with the key brownfield focus of the plan. This has shown that of the 38 total sites allocations in the plan (residential, mixed use and employment), 19 are brownfield, 11 are greenfield and 8 are a combination. Although two of the three employment allocations are greenfield, in terms of residential

development, 18 of the 35 are brownfield – more than half. Only 9 are greenfield. 75% of the allocated housing is on brownfield land.

- 2.45. This discussion has shown that the distribution of development was identified in a systematic and robust manner, based on evidence and consultation. The processes are considered to be robust and informed by reasonable judgement.

Q7. Have Policies S1 and S2 been included within the Local Plan Viability Assessment and tested to ensure that they are viable and deliverable?

- 2.46. Policies S1 and S2 have been considered in the Local Plan Viability Assessment (EVB-IF-01a). As a foundation, the viability testing is based upon three value areas, one of which, Value Area 1 – Exeter Central (VA1) specifically covers the areas where the strategic brownfield allocations are located. Value Area 3 - Exeter Outer (VA3) covers the rest of the built-up area and the other brownfield locations. Value Area 2 – Exeter edge (VA2) includes the existing greenfield allocations in the city and adjacent areas (EVB-IF-01a, paragraph 4.11, page 24).
- 2.47. The Viability Assessment specifically tests typologies which reflect the variety of development which is anticipated to come forward through the spatial strategy in Policy S1 (EVB-IF-01a, paragraph 5.3, page 40). This includes a variety of brownfield and greenfield development typologies at various scales (up to 150 dwellings) and types (including houses, flats, PBSA, co-living and other specialist house types).
- 2.48. The Viability Assessment documents the cost assumptions associated with the various policies in the plan (EVB-IF-01a, Appendix B, page 57). Owing to the foundational elements of the policy, Appendix B explains that elements of Policy S1 are considered through the typologies tested in addition to being reflected in the value areas.
- 2.49. More specifically, Policies S1 and S2 are strategic and set out the broad direction of the plan, with greater detail within individual plan policies.
- 2.50. Where individual plan policies have a viability implication these are set out in Appendix B of the Local Plan Viability Assessment (EVB-IF-01a) supplemented by further information in the Local Plan Viability Assessment Addendum (EVB-IF-01b). The latter presents site specific work for all of the strategic brownfield allocations, which are a key manifestation of the spatial strategy (EVB-IF-01b, chapter 3, page 14 onwards). The Addendum also covers employment sites. The viability work identifies the viability of these sites and therefore the spatial strategy.
- 2.51. The Addendum also responds to representations which questioned whether the elements of Policy S2: Liveable Exeter Principles had been addressed in the viability testing (EVB-IF-01b, paragraph 2.27, page 12). The Liveable Exeter Principles are at a high-level and, in the main do not have cost implications beyond those already factored into the testing associated with other more detailed policies in the plan. As an example, the high building standards required by Policy S2 is already covered by the testing which includes higher build costs to reflect Future Homes Standard (paragraph 2.28, page 12).

- 2.52. This discussion has demonstrated that the spatial strategy policies S1 and S2 have been included in the viability testing.

Q8. Do the Liveable Exeter principles apply to greenfield development, or just large-scale brownfield developments?

- 2.53. As drafted, the Liveable Exeter Principles in Policy S2 would only apply to the strategic brownfield allocations as per the introductory text to the policy:

‘All strategic mixed use brownfield development proposals must demonstrate how each of the following Liveable Exeter principles and requirements will be achieved’.

- 2.54. The potential application of the policy could be widened to areas of regeneration opportunity elsewhere in the urban area where comprehensive regeneration is being considered as per Policy H3: Regeneration Opportunity Areas. This is set out in suggested modification SMM 2 (CSD-03, page 3 and 4). All such sites would be brownfield.
- 2.55. On this basis, Policy S2: Liveable Exeter Principles only applies to brownfield development.

Q9. Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?

- 2.56. The distribution of growth and development has been fully tested by the SA which includes four strategic policy options (EXM-02a, paragraph 4.2, page 76) as follows:
- Option A: Focus most development on large, strategic brownfield sites.
 - Option B: Focus on developing greenfield sites.
 - Option C: Dispersal on smaller sites.
 - Option D: Focus on public transport hubs and routes within the city.
- 2.57. The SA clearly identifies that option A is the most appropriate strategic option (EXM-02a, Table 4.1, page 81). This has been taken forward into the spatial strategy. Options B, C and D are tested as reasonable alternatives.
- 2.58. The distribution of development has also been assessed through the Habitats Regulation Assessment in terms of impacts on European designated sites (CSD-08, paragraph 3.5, page 26 and Appendix 4, page 63). The appropriate assessment rules out adverse effects on the integrity for all European sites.
- 2.59. More widely, the distribution of development and growth has been assessed in terms of wider infrastructure implications through the Infrastructure Delivery Plan EVB-IF-02a. This has then been taken forward into an assessment on the transport network through a series of transportation evidence documents which are emerging as the Greater Exeter Transport Study involving Devon County Council and National Highways. For education, the distribution of development has been considered by Devon County Council through their evidence base EVB-IF-08 and further work commissioned by the City Council EVB-IF-07.

Other infrastructure providers have considered the development distribution through the infrastructure planning process.

Q10. Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints?

- 2.60. Policy S1 includes three specific elements which relate to minimising the need to travel and making use of transport infrastructure and the opportunities they provide. This will help to manage the impact on the constrained parts of the highway network. Point 4 specifically makes reference to focusing development on strategic brownfield sites in terms of access to public transport hubs. Point 7 includes the importance of providing mixed use development at densities which minimise the need to travel and maximise active travel and public transport. Point 8 aims to locate development near services and facilities to promote access on foot or inclusive equivalent. The distribution of housing reflects these elements of the spatial strategy
- 2.61. The Key Diagram (CSD-02, page 169) illustrates how the allocations relate to the transport network by showing the range of brownfield sites within the urban boundary, minimising the need to travel. It is also clear that the five strategic mixed-use brownfield allocations, the large-scale residential allocations and the employment sites are located on the arterial routes which provide good highway and public transport access. The Key Diagram and map of allocations (Submission Plan, page 136) show that the majority of the allocations are located some distance from the junctions on the strategic road network (SRN) which see particular constraints during peak hours. This aims to minimise impacts on the SRN.
- 2.62. As well as the spatial strategy, the distribution of development has been derived from the site assessments in the HELAA and the SA. Both of these assessments have taken into consideration the potential impacts of development on transport. In particular, the HELAA has been produced with comments from Devon County Council and National Highways which have identified the opportunities and constraints of the network for active travel, public transport and highways (EVB-H-02a, paragraph 3.18, page 13). This is also explained in the HEAA Methodology (EVB-H-02e, paragraph 5.14, page 10).
- 2.63. The preparation of the Exeter Plan, including the spatial strategy and site selection work closely followed the publication of the Exeter Transport Strategy (EVB-STC-04) and emerged alongside the preparation of the new Local Transport Plan 4 (EVB-STC-01), Exeter Local Cycling and Walking Infrastructure Plan (EVB-STC-03) and the Bus Service Improvement Plan (EVB-STC-02). This has ensured a close alignment of approach between land-use and transport strategy with development allocated on key transport routes and where improvements are proposed.
- 2.64. An example of this approach is at Water Lane which is allocated close to the new Marsh Barton Station which opened in 2023, on a bus route and adjacent

to cycle route E1, the spine of the Exeter cycle network included in the LCWIP (EVB-STC-03, page 21).

- 2.65. A summary of the position is provided in the Devon County Council representation which states that the Exeter Plan aligns with several of their strategies (A-01, page 2). The representation goes on to state that:

‘A key aspiration of the county council is to maximise the opportunities in development planning to utilise road space effectively, bringing about broader improvements in sustainable mobility and placemaking and providing opportunities to contribute towards the delivery of the Local Cycling and Walking Infrastructure Plan (LCWIP) routes. We consider that the Exeter Plan appropriately supports and links to Exeter’s LCWIP strategy’ (A-01, page 2).

- 2.66. The spatial strategy is also welcomed by National Highways (B-06, paragraph 20, page).
- 2.67. In summary, the distribution of development as advocated in the spatial strategy does appropriately reflect transport opportunities and constraints.

Q11. Would an alternative distribution within the Plan area of the same amount of new development be likely to have significantly less impact on the strategic road network?

- 2.68. The distribution of development included in the Exeter Plan provides a key focus on brownfield development in order to minimise the need to travel and seek containment. Of the 35 mixed use and residential sites to be allocated in the Exeter Plan (on the basis of suggested modification SMM9 – SMM27), 18 are brownfield, 8 are a combination of brownfield and greenfield and 9 are greenfield). By their very location within the urban boundary of the city, the majority of sites are some distance from the strategic road network which will minimise impacts.
- 2.69. In terms of the strategic brownfield sites, these provide for more than 2000 homes and 45% of the allocation units. All the strategic brownfield sites are at least 3km from the M5 junctions, minimising impacts. Looking at the SRN more widely, including the A30 and A38, the closest of the strategic brownfield sites to the SRN are Exe Bridges Retail Park and Water Lane which are located approximately 1.8km from the A30 (west) at Ide Interchange.
- 2.70. More generally, all the strategic brownfield sites are suitable for low or no-car development as identified in the County Council comments to the HELAA process (EVB-H-02a).
- 2.71. In terms of employment sites, the St Luke’s University campus is located close to the city centre (approximately 500m at points) and more than 3km from the SRN. The employment allocations towards the east of the city at Land adjacent to Sandy Park, Newcourt and Land adjacent Ikea, Newcourt are between 600m and 1km of the M5 at Junction 30. Devon County Council and National Highways have both acknowledged these allocations and have not raised objections.
- 2.72. Discussions with Devon County Council and National Highways have continued since the Regulation 19 consultation and in preparation for the

Exeter Plan examination, both authorities have confirmed that an alternative distribution of development would not be likely to have significantly less impact on the strategic road network.

Q12. For the plan to be sound, is it necessary for there to be additional evidence, at this stage, of the likely impacts of the new development proposed in the plan on junctions 29, 30 and 31 of the M5 and on the A30, A38 and A379 roads?

- 2.73. Modelling work on the Greater Exeter Transport Study has been ongoing since 2023. This work has involved the City Council, East Devon District Council, Mid Devon District Council, Teignbridge District Council, Devon County Council and National Highways. All the allocations in current and emerging local plans have been factored into this work.
- 2.74. The strategic transport assessment work has modelled background traffic growth and the impact of proposed allocations across the area using a Saturn model and has taken account of potential mitigation measures.
- 2.75. Operational assessments of the junctions on the strategic road network in and around Exeter at junctions 29 and 30 have been undertaken to consider the quantum of development which can be provided at Marcombe (the second new community in East Devon) within the capacity of the SRN junctions. Exeter development has not been a driver for this testing because neither Devon County Council nor National Highways have objected to the spatial strategy, nor sites in the Exeter Plan.
- 2.76. Discussions with National Highways and Devon County Council have identified that from the perspective of the highways authorities there is no need for further operational assessments related to Exeter Plan development regarding junctions 29, 30 and 31 of the M5 on the eastern edge of Exeter, the interchange junction of the A30 on the western edge of Exeter, the A38 or the A379 on the local highway network.
- 2.77. On the basis of the significant joint work which has been undertaken on strategic transport through the Greater Exeter study, no further operational assessments are required in order for the plan to be considered sound. In terms of transportation, the plan is justified as it provides an appropriate strategy based on the spatial strategy, sites and transport evidence. The plan is effective and deliverable with development supported by transport requirements derived from a high level of joint working. Finally, the plan is consistent with national policy, including NPPF paragraph 110 a and b in terms of transport.

Q13. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 2.78. There are no suggested main modifications in the Schedule of Suggested Modifications (CSD-03) for Policy S1: Spatial Strategy.
- 2.79. There is one suggested main modification for Policy S2: Liveable Exeter Principles. Suggested modification SMM2 is required to clarify that the Liveable Exeter Principles listed also apply to the regeneration opportunity

areas of Marsh Barton, North Gate and elsewhere within the urban boundary where comprehensive regeneration may come forward. This suggested modification is required for the policy to be considered deliverable in terms of ensuring large-scale brownfield development is of a high quality.

3. Issue 2: Employment Growth – Policy EJ1

- Q1. The Greater Exeter Economic Development Needs Assessment (EDNA) contains a baseline forecast of jobs growth for Exeter of around 13,500 new jobs over the period 2020-2040. The Employment and Jobs Topic Paper states that this will be exceeded with growth of about 14,900 new jobs over the plan period. Is this level of job growth realistic? How has it been calculated and how does it compare to other projections for employment in other parts of Greater Exeter over the plan period? How does it compare to past performance?**

How the job figure has been calculated

- 3.1 The EDNA (EVB-EJ-03a: page 33, Figure 4.4) sets out four potential economic and employment growth scenarios. Under the mid-point scenario, total job growth of 13,500 is calculated for Exeter for the period from 2020 to 2040. Under the clean growth scenario, 14,900 jobs could be created over this period.
- 3.2 These overall figures comprise growth in employment in some sectors and decline in others. Much of the new employment does not require employment sites or premises (as only certain sectors in the economy, such as Use Classes E(g), B2 and B8, require employment land). Under the mid-point scenario, approximately 11,000 new jobs created by growth in the Exeter economy do not require employment sites and premises. Under the clean growth scenario this is 11,500 jobs.
- 3.3 Existing employment land within Exeter identified in the EDNA could accommodate up to 1,800 jobs in office-occupying sectors (Use Classes E(g)i and ii), and 300 jobs in industrial/warehouse occupying sectors (Use Classes B2, B8, and E(g)iii) (EXM-02b: Employment change in Exeter, page 3, paragraph 3.4).
- 3.4 The proposed employment allocation sites within Exeter could accommodate between 1,390 and 1,800 jobs in sectors occupying a mix of all employment Use Classes, or up to 5,100 jobs if all development is in sectors occupying Use Class E(g) (EXM-02b: Employment change in Exeter, page 3, paragraph 3.6).
- 3.5 If the existing and proposed sites are developed according to the densities set out above, Exeter could accommodate more than the forecast 14,900 jobs forecast under the clean growth scenario.

Comparison to employment growth in other parts of Greater Exeter

- 3.6 Within the EDNA, employment forecasts were prepared for each of the Greater Exeter Districts. Under the mid-point scenario, there is total growth of 34,600 jobs in Greater Exeter comprising (EVB-EJ-03a, page 31):
- 8,400 jobs in East Devon (24% of Greater Exeter total)
 - 13,500 jobs in Exeter (39%)
 - 4,700 jobs in Mid Devon (14%)

- 8,000 jobs in Teignbridge (23%)

Comparison to historic growth

3.7 Within the EDNA, forecast growth in Exeter of 13,500 jobs over 20 years is around 675 jobs per year. Forecast growth of 14,900 jobs under the clean growth scenario over 20 years is around 745 jobs per year (EVB-EJ-03a: page 33, Figure 4.4).

3.8 This can be compared to historic growth rate data:

- The ONS Business Register and Employment Survey (BRES) presented in the EDNA showed that between 2017 and 2020 Exeter saw employment growth of 567 jobs per year.
- Cambridge Econometrics data for the period from 2010 to 2019 showed employment growth of 635 jobs per year.
- Experian data from 2010 to 2019 showed employment growth of 944 jobs per year.

3.9 In conclusion, the forecast annual growth under the mid-point and clean growth scenarios is within the range of historic annual growth rates from other sources used in the preparation of the EDNA. Therefore, it is considered that the jobs growth target for the Exeter Plan is justified and realistic.

Q2 How does the projected number of jobs compare to the supply of employment land and housing land? Could the projected number of new jobs (and thus homes and employment land needed) be higher?

3.10 The projected jobs number compares closely to the jobs growth that the Exeter Plan could deliver over the plan period based on the employment land allocations proposed and the wider strategy (see Employment Change in Exeter EVB-EJ-06a: pages 3-4, paragraphs 4.1-4.4). However, it should be noted that most of these new jobs do not require employment sites and premises as only certain sectors in the economy require employment land (i.e. only around 2,500 of the 13,500 forecast new jobs in Exeter would require sites and premises in Use Classes B2, B8, and E(g)).

3.11 There is also a balance between the jobs and housing. Within the EDNA, the employment growth forecast for the mid-point scenario was compared to the forecast future labour supply (i.e. the economically active population) provided by the specialist consultants ORS who prepared the 2024 Exeter Housing Needs Assessment and shown to be consistent with this (EVB-EJ-06a: page 41, Figure 5.9). This means there is a consistency and balance between jobs and housing.

3.12 Whilst higher and lower jobs numbers are possible, the jobs growth target suggested for insertion into policy EJ1 in the 'Exeter Plan schedule of suggested modifications' (CDS-03: SAMM53) is considered to be justified and

realistic (see response to Question 1 above) and closely related to and consistent with the housing requirement.

Q3 What is the difference between the four economic growth scenarios set out in the evidence? Why does the Council consider the mid-point economic growth scenario to be the most appropriate baseline for plan making purposes?

3.13 The method for calculating the future requirement for employment sites and premises is set out in the response to Matter 2, Issue 3, Question 1. This starts with two sets of economic growth forecasts, purchased from Cambridge Econometrics and Experian. Different forecasters use slightly different approaches and often forecast different levels of growth in different sectors, leading to slight variations in the overall levels of growth over a 20-year period. It is good practice to consider at least two sets of forecasts to avoid over-reliance on one provider and to provide a range.

3.14 To recognise the uncertainty of forecasting future growth and the variation between the two sets of forecasts, it is good practice to consider a number of different scenarios. To test the parameters of the two sets of forecasts, three scenarios have been derived from them:

Mid-point: the mid-point of the Cambridge Econometrics (CE) and Experian forecasts.

Minimum: the 'lowest' growth scenario, based on selecting the baseline forecast (from either CE or Experian) with the lowest growth for each sector.

Maximum: the 'highest' growth scenario, based on selecting the baseline forecast (from either CE or Experian) with the highest growth for each sector.

3.15 To account for local policy aspirations (both Exeter's desire to become one of the UK's leading knowledge, innovation and clean growth economies and East Devon's clean growth strategy⁶), a fourth scenario has been created in consultation with the three other Greater Exeter district councils - a **Clean growth** scenario - which applies an uplift on the mid-point scenario to employment growth in the Information & Communication and Professional, Scientific & Technical Activities sectors.

3.16 These scenarios show a range of possible growth outcomes, with the mid-point and clean growth scenarios being more likely than the minimum and maximum extremes of the range. On this basis, the City Council considers the mid-point provides the most reasonable idea of future needs based on a range of data and therefore meets the requirements of the PPG.

Q4. What is the justification for the suggested modifications to Policy EJ1? Why are they necessary for soundness?

3.17 Two main modifications are suggested to policy EJ1 in the Schedule of Suggested Modifications (CDS-03).

⁶ Available at: [ecn-006-a-clean-growth-vision-for-the-west-of-east-devon.pdf](#)

- 3.18 1. The existing Policy EJ1 supports development that meets the economic development needs of the city but does not clearly set out the overarching approach to supporting growth and does not include a jobs growth target.

The suggested modification (page 20, SMM51) is to amend the policy to read:

'Development proposals will be supported where they meet the economic needs of the city as identified in the Economic Development Needs Assessment. The established employment areas will be protected, new forms of employment provision delivered, and new sites allocated for employment use. This will deliver in excess of 14,900 jobs within Exeter over the Plan period.'

- 3.19 This suggested change is needed to clearly set out the overarching approach to delivering growth, and to indicate the number of jobs this will deliver, demonstrating the key role Exeter has in creating jobs and economic growth. This change helps ensure that the plan is positively prepared and effective. This change is therefore required for soundness.

- 3.20 2. The existing policy EJ1 supports Exeter in becoming one of the UK's leading knowledge, innovation and clean growth economies, but has a particular focus on the transformational sectors and lists these within the policy text.

The suggested modification (page 21, SMM52) is to amend the policy to read:

'The City Council is committed to supporting Exeter in becoming one of the United Kingdom's leading knowledge, innovation and clean growth economies. To help achieve this, appropriate development proposals in the priority sectors identified in the UK's Modern Industrial Strategy and the transformational sectors will be supported, and the City Council will work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, and improved education and training.'

- 3.21 The suggested modification ensures a balanced and flexible approach to economic growth that demonstrates alignment with the UK's Modern Industrial Strategy⁷ by referring to the priority sectors identified therein (as well as referring the transformational sectors). This helps ensure the plan is effective and consistent with national policy. This change is therefore required for soundness.
- 3.22 Various other changes are suggested to the supporting text; whilst it is not considered that these changes are required for soundness, they do address concerns made by other parties and make the Exeter Plan more effective.

⁷ Available at: [The UK's Modern Industrial Strategy](#)

4. Summary

- 4.1. This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 3 of the Exeter Plan Examination.
- 4.2. All questions associated with both issues for Matter 3 have been answered.