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13 February 2026

Dear Robert

MATTERS STATEMENT – EXETER PLAN EXAMINATION

Prepared on behalf of the University of Exeter

Matters addressed:

- Matter 8: Regeneration, Employment and Economic Development - Issue 5 – New Transformational Employment Allocations – Policy EJ6 (Q1–Q7)
- Matter 12: Historic Environment, Culture and Tourism - Issue 1 – History and Heritage – Policy HH1 (Q1–Q3)

INTRODUCTION

This Matters Statement is submitted on behalf of the University of Exeter (UoE) in response to the Inspectors' Matters, Issues and Questions (MIQs) published in January 2026. It addresses **only** the matters and questions listed above and should be read alongside the UoE's duly-made Regulation 19 representations, which remain extant.

The UoE **supports the objectives of Policy EJ6** and the identification of **St Luke's Health Campus** as a Transformational Employment Allocation. The UoE also **supports policy that confirms development at St Luke's Campus should be guided by a masterplan**, recognising this as the most appropriate and effective mechanism for coordinating development within a complex operational, heritage and townscape context.

The UoE is currently working closely with Exeter City Council (ECC) on a **new masterplan for St Luke's Campus**, and substantial collaborative work has already been undertaken by the University, its advisors and Council officers to produce a design-led framework to guide future development. This work has been informed by detailed, site-specific evidence and engagement with Design Boards.

The UoE's concerns are **focused and specific**. They relate to the **supporting text** associated with Policies **EJ6** and **HH1**, which directs decision-makers to have regard to an evidence base including the *Exeter Views, Density and Heights Study*. The UoE's position has consistently been that decision-making should be informed by **Stage 1 only** of that work (now titled the **Exeter Skyline Study**), alongside the more recent, detailed and site-specific evidence underpinning the St Luke's Campus masterplan.

The UoE notes and **supports the Council's Proposed Modifications**, which respond directly to this issue. As set out below, the UoE considers that the Proposed Modifications relating to **Matter 8** and **Matter 12** are capable of resolving its concerns and securing the sound application of Policies EJ6 and HH1.

MATTER 8 – REGENERATION, EMPLOYMENT AND ECONOMIC DEVELOPMENT

Issue 5 – New Transformational Employment Allocations – Policy EJ6

Q1. What are Transformational Employment Sites and what is the justification for their inclusion in the Plan?

UoE response:

Transformational Employment Sites are intended to support strategic economic growth, innovation and high-value employment. The UoE considers that research-led, education-related and wider knowledge-economy uses are central to this objective and supports the inclusion of Policy EJ6 in principle.

Q2. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

UoE response:

Concerning the St Luke's Campus, the University does not challenge the overall allocation process. Its concern lies with the supporting text to Policy EJ6 and the evidence base to which decision-makers are directed when assessing proposals.

Q3. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were potential impacts on heritage assets considered as part of this process?

UoE response:

Concerning the St Luke's Campus, whilst heritage impacts were considered as part of the allocation process, the UoE is concerned that continued reliance on Stage 2 of the *Views, Density and Heights Study* risks giving undue weight to conclusions that are now outdated. Stage 2 does not reflect the subsequent, detailed and site-specific assessment work undertaken jointly through the St Luke's Campus masterplan.

Q4. What effect will the allocation have on the character of the area, having particular regard to heritage assets?

UoE response:

Concerning the St Luke's Campus, any effects on character or heritage can be appropriately managed through careful design and masterplanning, informed by robust site-specific evidence. In the UoE's view, this reinforces the importance of relying on Stage 1 only of the *Views, Density and Heights Study*, alongside the masterplan evidence, rather than applying the outdated conclusions drawn from Stage 2.

Q5. Is it appropriate to defer decisions over the use and scale of future development to a masterplan/SPD, which would not be subject to examination in the same way as a development plan document?

UoE response:

It is recognised that proposed changes to the national planning policy and legislation will require local authorities to move away from preparing new SPDs, instead focusing planning policy content into local plans (i.e. The Exeter Plan) and Supplemental Plans (SPs). The UoE considers it entirely appropriate for detailed decisions relating to the use, scale and layout of development at St Luke's Campus to be addressed instead through a masterplan. This reflects the key features of the site, including its heritage, archaeological and townscape sensitivities, and the need for a flexible, coordinated approach over time.

The UoE notes ECC's Schedule of Suggested Modifications, which proposes revisions to paragraphs 7.32 and 7.33. The revised text confirms that significant development should be focused on the eastern part of the campus, respect defining features such as the Quad and North Cloister building and be informed by archaeological and heritage assessment. It also confirms that development will be guided by a masterplan prepared jointly by ECC and the UoE.

The UoE supports this approach. A jointly prepared masterplan provides an appropriate and transparent way to address site-specific issues in detail, informed by up-to-date evidence and continued engagement. This does not undermine the plan-led system; rather, it allows decisions to be made based on better and more current information than could reasonably be captured by the Exeter Plan itself.

However, the UoE considers that references to skyline or height evidence should be applied with care. Decision-makers should be required to have regard to Stage 1 only of the *Views, Density and Heights Study*, alongside the

detailed evidence underpinning the St Luke's masterplan. Reliance on Stage 2 risks attaching weight to conclusions which no longer reflect the agreed, site-specific work undertaken for the campus.

Subject to the supporting text clearly recognising the role of the St Luke's Campus masterplan, the UoE is content with the approach set out in Proposed Modification SAMM60. The UoE considers that this modification provides clarity, removes reliance on outdated evidence, and reinforces a collaborative, masterplan-led approach consistent with Policy EJ6.

Q6. Is it clear to decision-makers, developers and local communities what will be provided and where across each of the sites identified by Policy EJ6?

UoE response:

In respect of the St Luke's Campus, clarity is achieved through the combination of Policy EJ6 and a St Luke's Masterplan. Continued reference to Stage 2 of the *Views, Density and Heights Study* does however risk undermining that clarity by introducing conflicting or outdated assumptions.

Q7. What is the justification for the suggested modification to Policy EJ6? Why is it necessary for soundness?

UoE response:

The Proposed Modifications relating to Policy EJ6, including SAMM60, are justified and necessary to ensure the policy is **effective and capable of being applied as intended**. The UoE considers that these changes address its concerns under Matter 8, Issue 5.

MATTER 12 – HISTORIC ENVIRONMENT, CULTURE AND TOURISM

Issue 1 – History and Heritage – Policy HH1

Q1. Are the Plan's heritage policies consistent with the approach to conserving heritage assets in the Framework, having particular regard to the tests in paragraphs 206–209?

UoE response:

The UoE considers that Policy HH1 broadly reflects the heritage tests set out in paragraphs 206–209 of the Framework. Its concern does not relate to the principle of heritage protection, but to the supporting text and the evidence base to which decision-makers are directed.

As with Policy EJ6, the UoE considers that it is appropriate for decision-making to be informed by Stage 1 only of the *Views, Density and Heights Study*. Stage 1 provides a high-level city-wide context which can assist strategic heritage considerations.

By contrast, Stage 2 is considered to be outdated and flawed. It predates and does not reflect the detailed, site-specific assessment work undertaken jointly by the UoE and the ECC through the St Luke's Campus masterplan process. Continued reliance on Stage 2 risks applying generic conclusions to complex heritage contexts which have since been subject to more robust analysis.

Q2. Are policies HH1, HH2, HH3, HH4 and HH5 positively prepared, justified, effective and consistent with national planning policy?

UoE response:

The UoE previously raised concerns that reference to Stage 2 of the *Views, Density and Heights Study* introduced unnecessary uncertainty and risked undermining the role of more recent, site-specific evidence. The UoE notes that **ECC's Proposed Modifications to paragraphs 11.3 and 11.4** directly address this concern.

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

UoE response:

The UoE **welcomes and supports the Proposed Modifications** to paragraphs 11.3 and 11.4, which refine the supporting text to Policy HH1 and clarify the relationship between heritage policy, supporting evidence and site-specific master-planning.

Subject to reliance being limited to the **Exeter Skyline Study (Stage 1)** alongside the evidence underpinning the St Luke's Campus masterplan, the UoE considers that the Proposed Modifications satisfactorily resolve its concerns under Matter 12, Issue 1 and support the sound application of Policy HH1.

CONCLUSION

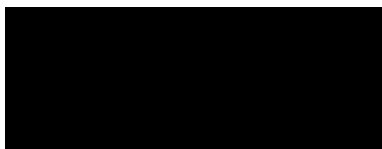
For the reasons set out above, the UoE considers that the matters raised under **Matter 8, Issue 5** and **Matter 12, Issue 1** can be resolved through the **ECC's Proposed Modifications**.

The UoE **supports the Proposed Modifications relating to Policy EJ6, including SAMM60**, which remove reference to the Exeter Views, Density and Heights Study, introduce reference to the **Exeter Skyline Study (Stage 1)**, and confirm that development at St Luke's Campus should be guided by a **jointly prepared masterplan**.

The UoE also **supports the Proposed Modifications to paragraphs 11.3 and 11.4** relating to Policy HH1, which refine the supporting text and align heritage decision-making with an appropriate, up-to-date and site-specific evidence base.

Taken together, the Proposed Modifications relating to **Matter 8** and **Matter 12** address the UoE's concerns, avoid reliance on outdated material, provide clarity for decision-makers and applicants, and ensure that Policies EJ6 and HH1 operate effectively, coherently and in accordance with national policy.

Yours faithfully



Robin Holloway
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