

THE EXETER PLAN

Submission

Statement of Consultation Regulation 22 (1) (c)

September 2025

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1. Introduction

1.1 This statement has been prepared to support the submission of the Exeter Plan, the Local Plan for Exeter, in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. As a statutory requirement, this document outlines how the City Council has adhered to government requirements relating to consultation during the local plan preparation process, specifically in relation to Regulations 18 and 19.

1.2 Regulation 22 (1) (c) requires a statement detailing:

- The bodies and individuals the local planning authority invited to make representations under Regulation 18.
- The methods employed to invite these bodies and individuals to make representations under Regulation 18.
- A summary of the principal issues raised by the representations made pursuant to Regulation 18.
- How any representations made pursuant to Regulation 18 were considered and addressed.
- If representations were made pursuant to Regulation 20, the number of such representations and a summary of the main issues raised.
- If no representations were made under Regulation 20, a statement confirming this.

1.3 This report meets the requirements of Regulation 22 (1) (c).

2. Plan preparation timeline

2.1 The City Council began preparing a revised Local Plan for the city at the end of 2020. The Local Plan has subsequently been named the 'Exeter Plan'. The Plan sets out the strategic vision, objectives and spatial strategy for the city, as well as the planning policies which will guide future development. The period covered by the Plan has evolved during its preparation but covers 20 years; the Regulation 19 Plan covers the period 2021-2041 and is in accordance with the December 2023 version of the National Planning Policy Framework (NPPF). The Plan will replace the Core Strategy which was adopted in 2012 and the Local Plan First Review which was adopted in 2005.

2.2 It should be noted that a potential suggested modification as set out in the Schedule of Suggested Modifications could amend the plan period from 2022 – 2042 to ensure a 15 year plan period from the potential point of adoption.

2.3 The timetable for preparing the Exeter Plan is set out in the Local Development Scheme¹ for Exeter which was approved on 15 July 2025. The timetable is set out below:

- Issues consultation (Regulation 18): September 2021.
- Outline Draft Plan consultation (Regulation 18): September 2022.
- Draft Plan consultation (Regulation 18): October 2023.
- Publication (Regulation 19): December 2024.
- Submission to Planning Inspectorate (Regulation 22): September 2025.

Indicative timetable (determined by Planning Inspectorate)

- Examination including hearings (Regulation 23 – 24): March/April 2026.
- Adoption of the Plan (Regulation 26): March 2027.

¹ Available at: [Local Development Scheme - Exeter City Council](#)

3. Issues consultation (Regulation 18): September 2021

- 3.1 The first step in developing the Exeter Plan began with seeking public input on an initial set of key issues for Exeter, as well as gathering feedback on a draft vision for the new Local Plan and potential approach to the pattern and quality of future development in Exeter. The Issues consultation document met Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is available here: [New Exeter Local Plan](#).
- 3.2 The Issues consultation document was available for public comment from 20 September 2021 to 15 November 2021. This consultation period lasted eight weeks, which is two weeks longer than the statutory minimum and the six weeks outlined in the City Council's Consultation Charter².
- 3.3 Responses to six open questions were gathered online through the City Council's website, with the option to email responses. Paper copies of the consultation document were made available at key locations or upon request, along with additional support as needed.
- 3.4 The consultation was promoted using a variety of methods, including:
- Regular inclusion in City Council's weekly e-newsletter (available through 'Stay Connected').
 - Two 'Covid-compliant' public exhibitions in city centre locations (Guildhall and Central Library), running from day to evening to promote accessibility.
 - Email/post notifications to all those on City Council's planning policy database.
 - Fully accessible online Issues consultation documents.
 - Promotion through Exeter Connect and associated networks.
 - Press releases.
 - Digital advertising screens at six locations throughout the city.
 - Social media promotion via City Council and other Exeter organisations, with frequent reposting.
 - An online video explaining the Issues consultation document.
 - Posters displayed in libraries, community centres, and parks.
 - Prominence on the City Council's webpage.
 - Availability of the Issues consultation document in all the city's libraries
 - An online question and answer webpage
- 3.5 The consultation engaged a wide range of respondents, including the public, statutory consultees and development promoters. All the consultees on the City Council's planning policy consultee list were contacted to inform them of the consultation. This included prescribed duty to cooperate bodies.
- 3.6 In total, the Issues consultation received 215 responses. Of these, 169 were submitted online through the website, 45 were submitted via email and PDF, and 1 written paper response was received. During the consultation period, the New Exeter Local Plan webpage was visited more than 1,300 times.

² Consultation Charter available here: [Consultation Charter](#)

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- 3.7 A full Consultation Summary Report was prepared to provide transparency around the consultation process and the feedback received. This report summarises who responded, the methods used to engage the community, and the key themes that emerged. It was formally discussed at a meeting of the City Council's Executive Committee on 30 November 2021, where its findings were considered as part of the plan-making process. The statement is available online here: [220209_Issues_consultation_summary_Final_for_website.pdf - Google Drive](#)
- 3.8 The consultation highlighted a wide range of issues and provided important direction for the further development of the Exeter Plan. The key messages outlined during consultation identified the importance of the Plan addressing the following issues:
- Green and open space, nature and biodiversity.
 - The need for sustainable growth.
 - Emphasis on the climate emergency.
 - Support for brownfield development.
 - Timely delivery of infrastructure – community as well as 'hard' infrastructure.
 - Support for neighbourhoods.
 - Support for local centres as well as the High Street.
 - Support for the local and green economy.
 - The need for a range of housing types and tenure, and truly affordable housing.
 - The importance of Exeter's heritage.
 - Greater recognition of the role of culture.
 - Sustainable and active travel, with provision for those unable to utilise active travel modes.
 - High quality design.
 - The need for evidence-based policy.
- 3.9 These insights directly informed the next stage of plan development – an Outline Draft Plan. The high-level comments made were used to identify the key matters which the Plan would address, the structure of the next consultation document and the early iterations of the spatial strategy, policies and potential development sites.

4. Outline Draft Plan consultation (Regulation 18): September 2022

- 4.1 Following the Issues consultation, the responses were reviewed, and additional evidence was gathered. This process resulted in the preparation of an Outline Draft Plan.
- 4.2 The Outline Draft met Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. It was the second consultation stage in the preparation of the Exeter Plan. The Outline Draft included the city's vision, potential development sites for various uses including housing, and a set of draft policies. However, this was not a complete draft plan.
- 4.3 The Outline Draft Exeter Plan document is available here: [The Exeter Plan](#).
- 4.4 The consultation was hosted on the Commonplace platform with the full consultation webpage available here: [Community Forum - Exeter Plan - Commonplace](#).
- 4.5 The following documents were provided alongside the Exeter Plan consultation:
- Sustainability Appraisal of the Exeter Plan: An assessment of the likely social, economic, and environmental impacts in and around Exeter.
 - Habitats Regulation Assessment of the Exeter Plan: An assessment of the Plan's potential effects on internationally important biodiversity sites in and around Exeter.
 - A varied evidence base.
- 4.6 The consultation took place from 26 September to 19 December 2022. This 12-week period was twice the length of the statutory minimum, and the 6 weeks outlined in the City Council's Consultation Charter.
- 4.7 The consultation engaged a wide range of respondents, including the public, statutory consultees and development promoters. All the consultees on the City Council's planning policy consultee list were contacted to inform them of the consultation. This included prescribed duty to cooperate bodies.
- 4.8 Responses to the draft policies and potential development sites were invited through the Commonplace platform and City Council's website. Additionally, respondents could email or post their feedback and paper copies of consultation questions were available upon request, along with other support as necessary.
- 4.9 The consultation was promoted through extensive means including:
- Regular inclusion in the City Council's weekly e-newsletter (available through 'Stay Connected') which goes to over 4,000 people across the city.
 - 15 public exhibitions held across the city in every ward, running daytime into evening to promote access. Officers from the City Development team spoke to over 1,000 people at these events. Each exhibition included display boards, online access to Commonplace via an iPad, paper copies of the plan and evidence material and the opportunity for people to ask questions and discuss policies and potential sites.

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- Email / post notification for all those included on the City Council's planning policy database.
 - A series of press releases.
 - Digital advertising screens at 10 locations in the city including prominent locations such as Central Station, the bus station, St Sidwell's Point Leisure Centre and the RAMM (museum).
 - A bridge banner over Bridge Road, a key route into the city.
 - Adverts on the City Council's fleet of bin lorries facilitating repeat coverage of all households in Exeter.
 - Article in Iscatape – Exeter's talking newspaper for visually impaired people.
 - Print posters: 200 across all wards in the city including libraries, community centres, parks, car parks and shops.
 - Articles included in the September 2022 and November 2022 editions of the Exeter Citizen newspaper which goes to each home in Exeter.
 - Events and workshops for students at the University of Exeter and at Exeter College.
 - Promotion through Exeter Connect and associated networks including a workshop with community organisations, such as Inclusive Exeter, the YMCA and Exeter Connect.
 - Promotion through Community Builders working at neighbourhood level in all Exeter wards.
 - Social media platforms: including Facebook, Instagram and Nextdoor via City Council, other Exeter organisations and many of the Exeter Plan exhibition venues' social media pages and calendars.
 - An online video outlining and explaining the Exeter Plan.
 - Prominence on the City Council's webpage.
 - Fully accessible online consultation documents, plus other formats available on request.
 - Copies of the outline draft consultation document available in all the city's libraries.
 - Permanent displays at Exeter venues including St Sidwell's Point Leisure Centre, Riverside Leisure Centre, RAMM (museum), Exeter Tickets (Corn Exchange) and the Civic Centre.
 - Promotion in advance of the outline draft consultation included the City Council's work with a local artist on a 'the Future of the High Street project' which was held in a vacant High Street shop unit during May 2022.
 - The Local Plans team also attended RAMM's Brick by Brick LEGO exhibition to speak to visitors about the future of the city during July and August 2022.
- 4.10 The City Council held 15 exhibitions across the city, with one in each of the 13 wards plus a city centre exhibition and one at the University. The exhibitions attracted a total of 1053 attendees.
- 4.11 The Exeter Plan Commonplace website received 15,781 hits and 1489 people, organisations and companies responded to the survey. Respondents could respond to quick format questions which included a five-point scale of agreement/disagreement, along with open-ended questions asking respondents to explain their views in detail. This format was included for every policy and potential site allocation in the Outline Draft Plan.
- 4.12 Following the consultation on the Outline Draft Exeter Plan, a comprehensive Statement was prepared to summarise the engagement process and record the feedback received. The statement was formally presented to City Council's Executive

Committee on 21st November 2022 and is available online: [The Exeter Plan](#) Outline Draft Consultation Statement.

- 4.13 Responses were categorised and reviewed by policy theme as set out in the Outline Draft Plan. Key messages and how they were considered are summarised below in Table 1.

Table 1: Summary of Responses to The Outline Draft Exeter Plan grouped by Plan Chapter

Chapter	Summary of comments	How comments were addressed
Spatial strategy	Respondents expressed general support for the vision's focus on a sustainable, inclusive, and resilient Exeter. However, many emphasised the need for stronger commitments on climate action, safeguarding green spaces, and ensuring the city's infrastructure can support growth. Concerns were also raised over the scale and distribution of proposed development, particularly in urban fringe locations.	The spatial strategy was revised to strengthen references to climate resilience, nature recovery, and inclusive growth. The spatial strategy was reviewed to focus on brownfield development and the regeneration of existing built areas before considering greenfield expansion. Further detail on infrastructure delivery and its coordination with growth has also been introduced in the updated draft.
Climate change	There was overwhelming support for policies that promote net zero development, renewable energy generation, energy efficiency, and low-carbon infrastructure. Some called for clearer targets and measurable outcomes, while others highlighted the need for stronger climate adaptation measures, such as managing flood risk and urban heat.	New policies were added to this chapter to address renewable and low carbon energy, ground-mounted photovoltaic arrays, future development standards, embodied carbon, solar-ready development and water quantity and quality. The City Council continued to work closely with the Environment Agency, Natural England and the South West Energy and Environment Group (SWEED) to evidence policies.
Homes	Many respondents supported the principle of delivering new homes but were concerned about the perceived large number of homes proposed, affordability, density, the type of housing that might be delivered, design quality, and the capacity of existing infrastructure and services to accommodate the level of housing growth. Particular concern was raised about the potential loss of green spaces, the pressure on schools and healthcare, and the need for	New policies were added to this chapter to secure and manage the provision of different types of homes, including affordable homes. Policies were also added on housing density and mix, accessible homes and amenity. Additional evidence was gathered to inform the site selection process, leading to reconsideration of some proposed allocations.

	housing to meet local needs.	
Economy and jobs	Respondents valued creative industries, digital infrastructure, and flexible workspace. Some questioned whether the Plan did enough to support outlying communities economically.	A new policy was added to this chapter to allocate sites for employment development. The City Council continued to work closely with neighbouring local authorities and Devon County Council to bring forward the Economic Development Needs Assessment (EDNA).
The future of our high streets	There was support for revitalising the city centre, encouraging local employment, and supporting mixed-use neighbourhoods.	Policies were revised to further promote the diversification of the city centre, with stronger support for cultural, leisure, and community uses.
Sustainable transport and communications	A major theme was the need for better walking, cycling, and public transport infrastructure. Respondents expressed concern about car dependency, congestion, and emissions, and many urged stronger action to shift travel behaviours. Some also questioned how new development sites would be integrated into the city's transport network.	Policies in this chapter were strengthened to include more specific commitments on active travel infrastructure and sustainable transport corridors. Development site assessments were reviewed to ensure alignment with transport connectivity. Continued discussions with Devon County Council helped to integrate the Plan with the Exeter Transport Strategy and the emerging Local Transport Plan.
Natural environment	There was strong support for protecting green spaces, improving biodiversity, and enhancing public access to parks, allotments, and play areas. Many respondents requested that nature recovery be prioritised across the plan and called for improved links between urban areas and the countryside.	New policies were added to this chapter to adopt a more ambitious nature-positive approach, with requirements relating to the green circle, urban greening factor and urban tree canopy cover. Reference to two new valley parks, Whitycombe Valley Park and Northbrook Valley Park were also added. The City Council continued to work closely with neighbouring local authorities, Devon Country Council and Natural England to help bring forward the Local Nature Recovery Strategy, ensure the Exeter Plan addressed requirements for habitat mitigation, and delivered biodiversity net gain.
History and heritage	Respondents valued Exeter's historic character and requested that new development reflect local identity and context.	The updated plan places stronger emphasis on design codes, heritage protection, and the role of design review.

Culture and tourism	Respondents highlighted the importance of Exeter's cultural assets, events, and tourism offer to the city's identity and economy. Many supported promoting cultural venues, creative industries, and the visitor economy. Some stressed the need for sustainable tourism that benefits local communities and does not compromise heritage or the environment.	Policies were revised to provide stronger support for cultural facilities, events, and the visitor economy. Greater emphasis was placed on creative industries, protecting cultural assets, and ensuring tourism development is sustainable and inclusive, while enhancing Exeter's national and regional profile.
High quality places and design	Comments showed the aspiration of high-quality, sustainable, and inclusive design, including green streets and resilient buildings.	Policies were aligned with national guidance and the emerging Water Lane Design Code SPD which reflects the principles raised during consultation.
Infrastructure and community	Comments stressed the importance of timely and well-funded infrastructure to support new development, including utilities, transport, education, and health. Concerns were raised about the deliverability of growth without appropriate coordination of infrastructure provision.	The infrastructure delivery section was expanded to include clearer phasing, funding mechanisms, and the role of key partners. The City Council's Infrastructure Delivery Plan has been updated in parallel to ensure consistency with the Plan.

- 4.14 The City Council analysed all responses in detail and worked with internal departments and external partners to refine policies, review proposed sites, and strengthen the evidence base.

5. Full Draft Plan Consultation (Regulation 18): October 2023

- 5.1 The Full Draft Exeter Plan consultation was the third consultation stage in the Exeter Plan process, using feedback from the previous two rounds to prepare the full draft. It met with Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations built on the content set out in the earlier Outline Draft.
- 5.2 The consultation on the Full Draft Exeter Plan took place from 23 October 2023 to 15 January 2024.
- 5.3 The Full Draft Exeter Plan document is available here: [The Exeter Plan Full draft Oct 23](#)
- 5.4 The consultation was hosted on the Commonplace platform with the full consultation webpage available here: [Community Forum - Exeterplanfull - Commonplace](#)
- 5.5 The following documents were provided alongside the Exeter Plan consultation:
- Sustainability Appraisal of the Exeter Plan: An assessment of the likely social, economic, and environmental impacts of the Full Draft Exeter Plan.
 - Habitats Regulation Assessment of the Exeter Plan: An assessment of the plan's potential effects on internationally important biodiversity sites in and around Exeter.
 - An evidence base on a wide range of issues.
- 5.6 Responses to policies and sites were collected online via Commonplace and the City Council's website. Respondents could also submit feedback via email or post, and paper copies of consultation questions were available on request, with additional support provided as needed.
- 5.7 The consultation questions were designed to allow respondents to either provide detailed comments or give quick responses if pressed for time. For each policy and site allocation in the Full Draft Plan, a five-point scale of agreement was used, accompanied by an open-ended question asking respondents to explain their views. A detailed review of the responses was conducted throughout 2024 that helped to shape the next draft of the Exeter Plan, the Publication version.
- 5.8 Significant efforts were made to present the consultation material in an engaging and accessible manner, including breaking the content into manageable sections on Commonplace, offering a series of 'quick questions' on key issues, providing an interactive map of development sites, and visual representations of what the sites could look like in the future. A fully accessible digital version of the Plan was available, and an audio version was produced on CD and uploaded online, with other formats available upon request.
- 5.9 All the consultees on the City Council's planning policy consultee list were contacted to inform them of the consultation. This included prescribed duty to cooperate bodies.
- 5.10 The consultation was promoted using various methods:
- Regular updates in the City Council's weekly e-newsletter, reaching over 4,000 people.

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- 15 public exhibitions across the city, with 12 running from day into evening for better accessibility, and 3 held at Exeter Library during lunchtime. Each exhibition featured display boards, the draft proposals map, paper copies of the plan, and evidence materials, with staff available to answer questions.
 - Engagement at 5 established community cafés and coffee mornings attended by the City Development team.
 - Notifications via email or post to those on the planning policy database and properties in potential development areas.
 - A series of press releases during the consultation period.
 - Digital advertising on 20 city-wide screens, including high-traffic areas like Central Station and the bus station.
 - Advertisements on the City Council's fleet of bin lorries for repeated coverage across households.
 - Banners over Bridge Road and Topsham Road – key radial routes for the city.
 - An article in Iscatape, Exeter's talking newspaper for visually impaired people.
 - Distribution of over 200 posters across the city in locations such as libraries, community centres, parks, and schools.
 - Articles in the September and November 2023 editions of Exeter Citizen, distributed to all addresses in the city.
 - Promotion through Exeter Connect, Exeter's Community Builders, and local community networks.
 - A community organisation workshop.
 - Prominent display on the City Council's website homepage.
 - Extensive use of social media, including posts on Facebook, Instagram, and other local organisations' platforms.
 - An online video explaining the Exeter Plan.
 - Copies of the Full Draft Plan available in all the city's libraries.
 - Permanent displays at various Exeter venues, including St Sidwell's Point Leisure Centre, Riverside Leisure Centre, and the Civic Centre.
- 5.11 In total, 20 in-person events were held. City Council officers spoke with over 600 people during these events, and an additional 2,856 individual consultations were received from residents, businesses, and organisations across the city.
- 5.12 Significant efforts were made to engage with a wide variety of groups in a number of ways. The total number of hits received on the Commonplace consultation webpage was 11,248.
- 5.13 Response monitoring also took place during the consultation period in order that efforts could be made to encourage further engagement as the consultation progressed. This resulted in additional activities being implemented and a significant increase in the number of responses in the last two weeks of the consultation when compared with the Outline Draft Plan. The additional activities included:
- Additional exhibitions in a wide variety of venues.
 - Attendance at existing community cafés.
 - Use of 'quick questions' online.
 - Frequent press releases.
 - Frequent social media activity including Instagram reels.
- 5.14 Following the consultation on the Full Draft Exeter Plan, a detailed Consultation Statement was prepared, documenting the extensive engagement activity and

summarising feedback. This statement was presented to the City Council's Executive Committee, ensuring transparency and oversight. The statement is available online and can be accessed here: [The Exeter Plan](#): Full Draft Consultation Statement.

- 5.15 The consultation responses were reviewed throughout early 2024 and helped shape the Publication version of the Exeter Plan. Table 2 summarises the key messages by chapter based on the Consultation Statement and how these informed revisions to the Plan. A document showing these revisions was published alongside the Regulation 19 version of the plan: [Microsoft Word - 241125 Publication plan - summary of changes since draft plan](#).

Table 2: Summary of Responses to The Full Draft Exeter Plan Grouped by Plan Chapter

Chapter	Summary of comments	How were comments addressed
Spatial strategy	Broad support for brownfield development strategy. Concerns around infrastructure, traffic, building height, and density.	<u>S1: Spatial strategy</u> - Minor additional elements added regarding cross boundary employment, city-wide biodiversity, density in the context of local characteristics and heritage, reference to improving services as well as infrastructure. <u>S2: Liveable Exeter principles</u> - Minor revisions to make reference to waste management, climate change resilience, healthy streets, multifunctional GI.
Climate change	Strong support for net zero, energy-efficient buildings, and local energy networks. Some scepticism about implementation.	<u>CC1: Net zero</u> - Added requirement for major development proposals to submit a Net Zero Statement - Added requirement to minimise operational and embodied carbon emissions - Minor rewording to reference 'wheeling' and 'nature-based solutions' <u>CC2: Renewable and low carbon energy</u> - Minor rewording to add clarity – 'Development proposals for energy generation' <u>CC3: Local energy networks</u> - Text added to refer to demonstrating if the development is not feasible or viable - Minor rewording to add clarity

		<u>CC4: Ground-mounted photovoltaic arrays</u> - Minor rewording to refer to 'heritage assets' (rather than 'historic assets') <u>CC5: Future development standards</u> - Significant amendments to ensure policy requirements fit with governments emerging Future Homes Standard and Future Building Standard <u>CC6: Embodied carbon</u> - Minor rewording of criteria a and b to add clarity - Policy requirement for minor residential development changed to allow one for one replacement homes where the lifecycle carbon footprint is lower. <u>CC7: Development that is adaptive and resilient to climate change</u> - New policy aimed at ensuring new development is adaptive and resilient to climate change by reducing overheating in buildings, reducing flood risk and aiding recovery from flooding, integrating biodiversity into the built environment, adapting to reduced water availability and retrofitting renewable energy technologies. <u>CC8: Flood risk</u> - Inserted requirement to adhere to the drainage hierarchy - Minor rewording to ensure clarity <u>CC9: Water quantity and quality</u> - Reference added to Storm Overflow Action Plan
Homes	Mixed support. Concerns around affordability, student accommodation, and impacts of high-density housing on local character and infrastructure.	<u>H1: Housing requirement</u> - Overall planned housing delivery figure was amended from 14,124 to 13,975. - The figure for homes already completed was updated to reflect a new plan period (extended by 1 year), plus the addition of

		completions in 2023/24. • The figure for homes with planning consent was updated to reflect the position at 1 April 2024. • The figure for site allocations was updated to reflect further work on site assessments and the granting of consent for some sites. • The figure for windfalls was updated to reflect an updated assessment of potential windfalls. <u>H2: Housing allocations</u> • Sites were re-categorised to reflect their scale. • The list of sites and some site capacities were updated to reflect further work on site assessments and the granting of consent for some sites. <u>H3: Regeneration opportunity areas</u> • This new policy was introduced to give specific policy support to the regeneration of brownfield sites across the city, subject to consideration of constraints. • The policy identifies Marsh Barton and North Gate (previously proposed as allocations) as potential regeneration opportunity areas. <u>H4: Affordable housing</u> • The target percentage for affordable housing delivery was amended from 35% for all major sites to 35% on major greenfield sites and 15% on major brownfield sites, to ensure that the Plan is viable. • The tenure split for affordable housing delivery was amended to 50% social rent and 50% affordable homeownership, to reflect the need for affordable housing in Exeter (as found in the 2024 Exeter Local Housing Needs Assessment). • Reference was added to affordable rent being an appropriate substitute for social rent, where necessary to enable scheme viability. <u>H5: Build to rent</u> • Minor re-wording of the policy to improve clarity.
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		<u>H6: Co-living housing</u> • Minor re-wording of the policy to improve clarity. • Policy was amended to state that affordable housing provision should be made off-site by means of a financial contribution, as co-living itself is not suitable as affordable housing. • Policy was amended to no longer refer to the need to consider the concentration of co-living housing in the locality. This would be considered under policy H15. <u>H7: Custom and self-build housing</u> • Policy was amended to no longer allocate sites for the provision of custom and self-build housing. • Clarity was provided on the size of developments (20+ homes) that should include custom and self build plots, and the number of plots that should be provided (5% of total homes on the site). • Minor re-wording to improve clarity. <u>H8: Homes for older people</u> • This new policy was added to support the provision of homes for older people subject to consideration of constraints. This type of housing was previously covered by policy H7 'Specialist Housing', but due to the need for older persons housing, it was considered to warrant its own specific policy. <u>H9: Supported housing</u> • Policy was re-named (from Specialist Housing) to provide greater clarity. • Minor re-wording to improve clarity. <u>H10: Purpose build student accommodation</u> • Policy was amended to no longer refer to the need to consider the concentration of PBSA in the locality. This would be considered under policy H15. The supporting text to H10 was also amended to refer to the need to consider potential local impacts of development so that potential issues with amenity are avoided or addressed appropriately.
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		- Minor re-wording to improve clarity. <u>H11: Gypsy and Traveller accommodation</u> - New criterion were added to ensure that pitches/plots are only occupied by Gypsies and Travellers who meet the Government's published definitions of Gypsies and Travellers/Travelling Showpeople or who are cultural Gypsies and Travellers/Travelling Showpeople, to ensure that the pitches/plots are meeting specific needs. - Minor re-wording to improve clarity. <u>H12: Residential conversions and houses in multiple occupation</u> - Clarification was added that, other than in exceptional circumstances, new HMOs will not be granted planning consent: Within the Article 4 area or outside the Article 4 area if this will cause or exacerbate an over-concentration of HMOs in the locality (defined in the supporting text as 20% or more of homes in a postcode and adjoining postcodes being HMOs). - Minor re-wording to improve clarity. <u>H13: Loss of residential accommodation</u> - No changes made. <u>H14: Accessible homes</u> - Clarification was provided that the policy only applies to new homes to which Part M Volume 1 of the Building Regulations applies (i.e. currently, all new build homes). - Market homes are now only required to meet Building Regulations M4(2), with no requirement to meet Building Regulations M4(3). This change has been made to ensure the policy reflects Government guidance and so that the Plan is viable. - Minor re-wording to improve clarity. <u>H15: Housing density and size mix</u> - Amendment was made to require all developments to take account of local housing need, no matter what size they are.
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		- Minor re-wording to improve clarity. <u>H16: Residential amenity and healthy homes</u> - Minor re-wording to improve clarity. - An additional criterion was added, requiring that new homes are future-proofed for changes in lifestyle and use.
Economy and jobs	Support for high-tech and green sector focus. Concerns about the future of traditional employment and skills.	<u>EJ1: Economic growth</u> - Overarching statement added to provide support for proposals that meet the economic needs of the city - Added 'Green economy' sector <u>EJ2: Retention of employment land</u> - Minor rewording to strengthen protection for employment land and ensure clarity of decision making <u>EJ3: New forms of employment provision</u> - No change <u>EJ4: Access to jobs and skills</u> - No change <u>EJ5: Provision of local services in employment areas</u> - Criteria added to require development to support ongoing and viable employment provision. <u>EJ6: New Transformational employment allocations</u> - Toby Carvery deleted from allocation policy as land not confirmed as available
Retail and the future of centres	Support for mixed-use centres, reduced car use, and revitalisation. Concerns about rents, loss of key shops, and lack of affordable housing downtown.	<u>RFC1: The future of our centres</u> Policy shortened to focus on the strategic approach to the centres and widening the range the acceptable uses located there. <u>RFC2: Development in, and affecting, our</u>

		<u>centres</u> • New policy with more technical detail about the application of the sequential test, appropriate retail in the strategic brownfield sites and restricting out of town retail.
Sustainable transport and comms	Support for active and public transport. Concern about realistic alternatives to car travel and infrastructure lag.	<u>STC1: Sustainable movement</u> • Addition of reference to the transport hierarchy. • Addition of reference to waterways as transport infrastructure. • Addition of reference to the transport role of the canal. <u>STC2: The transport hierarchy (new name)</u> • Clearer reference to the transport hierarchy. • Reference to the need for transport enhancements to take account of environmental impacts • Additional text to refer to the need for developer contributions for transport. <u>STC3: Supporting active travel</u> • Referencing clear support for new routes and links to PROW going outside the city. • Inclusion of text regarding reinstating historic street patterns. <u>STC4: Supporting public transport</u> • Additional text regarding late bus services. • Additional reference to improvements to park and ride. • Particular reference to accessibility improvements at specific rail stations • Additional text supporting rail freight. <u>STC5: Supporting more sustainable forms of car use</u> • More detail about design requirements for charging points. • Reference to parking standards from the sustainable transport SPD. • Additional text referencing building regulations covering charging points.

		<u>STC6: Travel Plans</u> • Travel plans now to be required for more development types related to impact. • Additional text added to require proportionate detail related to scale of development nature of impact. • Additional text requiring an action plan in the travel plan. <u>STC7: Safeguarding transport infrastructure</u> • Additional safeguarding of rail freight area at St Davids. • Inclusion of safeguarding for an alternative emergency/access egress routes. • Inclusion of safeguarding of the canal. <u>STC8: Motorway service area</u> • Additional mention of the delivery of a new service area requiring collaboration with other LAs and National Highways. <u>STC9: Digital communications</u> • No significant change.
Natural environment	Strong support for protecting biodiversity and green spaces. Preference for brownfield over greenfield development.	<u>NE1: Landscape setting areas</u> • Text amended to ensure clarity and consistency in relation to managing flood risk and delivering other forms of climate resilience • Text amended to require infrastructure to be 'essential' and 'strategic' <u>NE2: Valley Parks</u> • Added requirement that proposals will only be permitted where they deliver a meaningful contribution to an appropriate use and do not harm the key purposes for which the Valley Parks are designated • Text amended to ensure clarity and consistency in relation to managing flood risk and delivering other forms of climate resilience

		<u>NE3: Biodiversity</u> - Minor text changes as suggested by Natural England <u>NE4: Green Infrastructure</u> - Requirement to submit a Green Infrastructure Plan broadened to include all large scale development <u>NE5: Green circle</u> - Minor text change to ensure clarity (deletion of 'normally') <u>NE6: Urban greening factor</u> - Minor text changes to ensure clarity - Additional text added to ensure delivery and retention of urban greening <u>NE7: Urban tree canopy</u> - Policy wording amended to aid understanding and provide clarity - Percentages deleted from policy but clear statement included that proposals resulting in an overall loss of tree canopy cover will not be permitted
History and heritage	Broad support for protecting historic character and city walls. Concern about impacts of tall buildings and dense development.	<u>HH1: Conserving and enhancing heritage assets</u> - Additional requirement for all large scale development to improve interpretation of the historic environment. - Clarifies the protection of heritage assets and provides more explanation regarding impact weighed against public benefit. <u>HH2: Conservation areas:</u> - New policy to ensure conservation of the distinctive character, special architectural value and historic significance of Conservation Areas <u>HH3: Archaeology:</u> - New policy providing clear steer on the approach to be taken to preserving

		archaeology, mitigation and recording. <u>HH4: Heritage assets and climate change</u> - Reworked policy providing support to development which may impact on heritage assets where they minimise carbon impacts and support climate change adaptation. <u>HH5: Conserving and enhancing Exeter City Walls</u> - Minimal changes
Culture and tourism	Support for promoting cultural venues and events. Desire for a strong cultural identity and inclusion of community-led spaces.	<u>C1: Protecting and enhancing cultural and tourism facilities</u> - Minor change explaining a limited number of situations in which the loss of cultural facilities may be justified <u>C2: Development and cultural provision</u> - Additional requirement for development to be sensitive to local cultural and cultural practices. - Additional requirement for large scale development proposals to be accompanied by a cultural plan.
High quality places and design	Desire for stronger design codes and better public realm. Calls for accessible, inclusive, and sustainable design.	<u>D1: Design principles</u> - Reworked policy including additional design requirements including regarding waste management and designing-out crime. <u>D2: Designing-out crime</u> - New policy stating the key considerations where development proposals can minimise and manage the impacts of crime. <u>D3: Advertisements:</u> - Additional text referring to the need to consider lighting in the determination of applications for adverts.
Health and wellbeing	Support for policies linking planning to wellbeing. Requests	<u>HW1: Health and wellbeing</u>

	for safer streets, green spaces, and reduced pollution.	- Minor addition to cover designing-out crime <u>HW2: Environmental quality, pollution and contaminated land</u> - Additional requirements for monitoring frameworks alongside planning applications - New requirements regarding the need for development proposals to consider and manage impact on future residents in terms of contaminated land and pollution.
Infrastructure and facilities	Concern about delivery of schools, healthcare, utilities. Desire for clear phasing and developer accountability.	<u>IF1: Delivery of infrastructure</u> - Minor revisions - Addition of text requiring infrastructure phasing plans for large-scale residential development proposals <u>IF2: Viability</u> - Minor revisions only. <u>IF3: Community facilities</u> - Greater detail about the circumstances in which community facilities will be protected and associated criteria - Additional reference to contributions to community facilities . <u>IF4: Open space, play areas, allotments and sport</u> - Reworked policy including different set of community facilities. Greater detail about the circumstances in which community facilities will be protected and associated criteria - Additional reference to contributions to community facilities <u>IF5: New cemetery provision</u> - Minimal revision

5.16 The Full Draft Exeter Plan consultation provided insight into community priorities, local concerns, the position of statutory consultees and views of the development industry. The Plan's broad strategic direction, especially the inclusion of significant brownfield development allocations, was reaffirmed by strong public backing. However, issues raised signalled the need for further policy refinement.

6. Publication (Regulation 19): December 2024

Responses provided under Regulation 20

- 6.1 The Publication Draft Exeter Plan consultation represented the fourth formal stage in the development of the Exeter Plan and marked a key milestone in the plan-making process. It built on previous consultation stages, Issues (2021), Outline Draft (2022), and Full Draft (2023) and incorporated the feedback received through those rounds to produce a refined, legally compliant version of the Plan. This stage met the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which invited formal representations before the Plan was submitted for independent examination. The Regulation 19 Publication version of the plan is the Submission Plan.
- 6.2 The consultation on the Publication Draft Exeter Plan took place from 12 December 2024 to 4 February 2025. The Exeter Plan: Publication Plan (Regulation 19) was published on 12 December 2024 and was open for the submission of representations until 6 February 2025.
- 6.3 The Publication Exeter Plan document is available here: [exeter-plan-publication-plan-regulation-19.pdf](#)
- 6.4 The consultation was hosted on the Commonplace platform with the full consultation webpage available here: [Community Forum - Exeter Plan Publication - Commonplace](#)
- 6.5 The Publication Draft Exeter Plan was the final draft version of the Exeter Plan before submission to the Secretary of State for examination. The consultation specifically focused on the legal compliance and soundness of the Plan, and representations submitted during this stage will be considered by the Planning Inspectorate as part of the examination process.
- 6.6 The following key supporting documents were made available alongside the Publication Draft Exeter Plan:
- Sustainability Appraisal (SA): An updated appraisal evaluating the likely social, environmental, and economic impacts of the Plan and ensuring the most sustainable options have been considered.
 - Habitats Regulations Assessment (HRA): Assessing potential effects of the Plan on internationally designated biodiversity sites.
 - Policies Map: A comprehensive map illustrating site allocations, designations, and spatial strategy boundaries across the city.
 - Detailed evidence base comprising specialist studies on a wide range of issues. The publication plan evidence base is available here: [Look Back at - Evidence and Supplementary Documents - Exeter Plan Publication](#).
- 6.7 All the consultees on the City Council's planning policy consultee list were contacted to inform them of the consultation. This included prescribed duty to cooperate bodies.
- 6.8 Representations were submitted via the City Council's Commonplace online engagement platform, by email, or in writing by post, with additional support made available for those needing alternative formats or assistance. The consultation platform was designed to allow users to comment either by section or on the Plan as a whole, and to indicate whether their representation supported, opposed, or sought

modification of the Plan. Respondents were also invited to state whether they wished to participate in the Examination hearings. A formal representation form was promoted for use.

6.9 As with previous stages, the City Council made concerted efforts to present consultation materials in an accessible, clear, and engaging format, including:

- A fully interactive and accessible digital version of the Plan.
- Clear section summaries and navigation tools.
- FAQs and guidance on how to submit representations.
- Easy-read versions and audio materials for wider accessibility.

6.10 The consultation was promoted through a programme of communication and engagement including:

- Notices on the City Council's website and homepage banners.
- Direct emails to those on the planning policy database and statutory consultees.
- Publicity through social media, press releases, and community partners.
- Posters and printed material in libraries.
- Availability of paper copies of the Plan at libraries and on request.
- Various meetings with statutory consultees.

6.11 The Regulation 19 consultation was a formal stage to assess whether the Plan is legally compliant, positively prepared, justified, effective, and consistent with national policy.

6.12 A total of 111 named representors responded to the Regulation 19 Publication consultation. There were a total of 372 representations in their original form. 21 of the representations were anonymous. Having processed the representations, the representations have been separated out more clearly with regard to each part of the Plan commented on. In this case, the number of representation comments is 828³.

6.13 Table 3 below includes a summary of the key issues raised during the Regulation 19 consultation (pursuant to Regulation 20). This list is not exhaustive. These are also explored in the 'Statement of Issues' and 'Suggested Modifications' documents.

Table 3: Summary of Responses to The Publication Exeter Plan Grouped by Plan Chapter

Chapter	Key issues raised
The need for a 15-year plan period from the likely point of adoption	• In accordance with paragraph 22 of the NPPF, there is a need for a 15-year plan period after adoption of the Exeter Plan. This will not be provided for by the Plan period of the Regulation 19 Publication Draft Plan which runs from 2021

³ Due to the varied ways in which representors responded to the consultation (including directly on the Commonplace platform or by a combination of representations forms and letters submitted by email), there are multiple possible approaches to counting the number of representations received. For the purposes of this report, the City Council has counted each Commonplace response, representation form and letter as a separate representation received. In instances where representors have submitted a representation form and a letter combined into one pdf document, this has been counted as a single representation.

	– 2041.
Spatial strategy	- Challenges to the spatial strategy including the need for more of a mix of brownfield and greenfield sites. - Over-reliance on brownfield land and need for more greenfield development. - Greater variety of development sites required. - Viability of brownfield land. It should be noted that various issues related to the spatial strategy are considered in more detail in the context of the other chapters of the Plan.
Climate change	- Net zero ambiguity. - Inappropriate approach to local energy networks. - Requirements for sustainable construction go beyond national standards.
Homes	- Transitional arrangements for plan preparation and housing requirements. - The need to plan for a larger number of homes due to deliverability risks, the housing crisis, the need for affordable homes, past under delivery, to ensure a five year land supply, the need to support SME housebuilders and the need to support economic growth. - Demonstrating a five-year land supply.
Economy and jobs	- Insufficient employment land allocated. - Overly restrictive focus on transformational sectors. - Loss of employment at the strategic mixed use brownfield allocations.
The future of our centres	Scale of retail provision at the East Gate and Exe Bridges Retail Park strategic mixed use brownfield allocations.
Sustainable transport and communications	The need to refer and commit to the delivery of the Greater Exeter Transport Study in relation to various transport policies.
Natural environment	- Inappropriate strength of protection for the landscape setting areas. - Restrictive protection for the Valley Parks, including private land and scope of boundaries
History and heritage	Insufficient protection provided to heritage assets in the city, both designated and non-designated, by the various policies in the history and heritage chapter and in the context of strategic brownfield development.
Culture and tourism	No key issues: Issues raised were matters of detail.
High quality places and design	No key issues: Issues raised were matters of detail.
Health and wellbeing	The need for planning contributions towards GP provision and in which cases these apply.
Infrastructure and facilities	- Education infrastructure needs: Particularly primary school provision and site area. - Detail of viability review mechanisms at planning application stage. - Detailed policy text regarding community facilities, open space, play areas, allotments and sports facilities.

Site allocations	• Various issues of detail relating to the strategic mixed use brownfield, employment and residential sites: • SBA1: Water Lane: Primary school site area required. • SBA2: East Gate: The potential heritage impact of development. The suggested need for a replacement police-base. • SBA3: Red Cow: No key issues raised. • SBA4: Exe Bridges Retail Park: The likely delivery of development at the end of the plan period and the need to provide for the continued retail function at the site. • SBA5: South Gate: The potential heritage impact of development: Conservation Area, Listed Buildings, archaeology and historic views. • EJ6: St Lukes Campus, Heavitree Road: Heritage considerations and differing views on the weight that should be given to the 'Exeter Skyline Study'.
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6.14 The representations received during the Regulation 19 Publication consultation have been reviewed and will inform the discussion at examination. A Statement of Issues document has been prepared to summarise the key issues for each chapter of the Plan. This is supplemented by a series of suggested modifications to the plan which could address some of the issues raised in the representations. These are presented in a Schedule of Suggested Modifications document.

7. Summary

- 7.1 The preparation of the Exeter Plan has been underpinned by an extensive programme of public and stakeholder consultation, reflecting the City Council's commitment to transparency, inclusivity and evidence-based plan-making. Over the course of four major consultation stages, Issues (2021), Outline Draft (2022), Full Draft (2023), and Publication (2024), thousands of contributions have been received from residents, community groups, developers/promoters/landowners, statutory consultees and partner organisations. These responses have shaped every stage of the Plan's development and ensured that local voices and expertise are embedded within its vision, objectives, policies and site allocations.
- 7.2 This Consultation Statement demonstrates how the City Council has responded to feedback at each stage, revising policies, testing assumptions and strengthening the evidence base. The accompanying Statement of Issues provides a clear record of the main matters raised during the Publication consultation and the City Council's high-level responses.