

Exeter Plan

Statement of Common Ground

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

September 2025

Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN



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1.0 Executive summary: List of outstanding issues

- 1.1. All issues raised in National Grid Electricity Distribution's (NGED) representation dated 6th February 2025 have been resolved and there are no outstanding issues.

2.0 Introduction

- 2.1. Exeter City Council (the City Council) have been preparing the Exeter Plan since late 2020. The plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 2.2. Following the end of the publication process in February 2025, representations have been compiled, and attention has turned to addressing the issues raised in the representations.
- 2.3. National Grid Electricity Distribution (NGED) submitted a representation on the Regulation 19 Plan by email on 6th February 2025. The matters raised are considered through this Statement of Common Ground.
- 2.4. This Statement of Common Ground demonstrates that the City Council and NGED have cooperated on strategic matters since the outset of plan-making and that the plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph 35 of the National Planning Policy Framework¹. The document assists in presenting evidence that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It is also part of the evidence required to demonstrate compliance with the Duty to Cooperate.
- 2.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance² and meets the requirements of the Planning and Compulsory Purchase Act 2004³ and the Localism Act 2011⁴.

¹ The Exeter Plan is being prepared under the December 2023 version of the NPPF. Available here:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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

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

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

3.0 Strategic matters: Spatial strategy

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

4.0 Strategic matters: Climate change

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

- 4.3 NGED's representation dated 6th February 2025 raised the following matter in relation to the climate change chapter at Regulation 19 Publication stage:
- The provision of local energy networks as supported by Policy CC3 is reliant on there being sufficient available capacity within the National Grid. Capacity within the network serving Exeter is particularly limited and is contingent upon the delivery of necessary National Grid infrastructure which is expected to only be delivered towards the end of the plan period.
- 4.4 At a meeting between the City Council and NGED on 27th August 2025, NGED outlined an updated position in relation to capacity which included that:

- NGED are proactively planning to meet the growth in electricity demand arising from new housing and economic growth, and from the shift towards net zero.
- There is a need for local authorities to keep NGED informed on an annual basis of planned developments, to safeguard existing National Grid infrastructure, and to work proactively with NGED in relation to planned infrastructure investment projects.
- While there remains a need for a conservative approach to development in relation to National Grid capacity, NGED has plans in place that will, subject to obtaining the necessary consents, deliver the necessary infrastructure reinforcements needed to provide the additional capacity.
- A new Bulk Supply Point (132kV to 33kV) is needed and, although the solution for this has needed to be revised after a planning application was refused for a site near Matford in Teignbridge, a more complete, overall approach is being advanced through a site identified in East Devon, east of the M5. Subject to the necessary consents, this is expected to be delivered by around 2030, ahead of the timeframe of 2036-2041 previously estimated within the City Council's Infrastructure Delivery Plan and referred to within NGED's Regulation 19 representation.
- The necessary 132kV reinforcements are underway and are expected to be completed within 2-3 years, ahead of the timeframe of 2036-2041 previously estimated within the City Council's Infrastructure Delivery Plan and referred to within NGED's Regulation 19 representation.
- A new primary substation is being planned at Peamore in Teignbridge and, subject to the necessary consents, is estimated for completion by 2028.
- NGED are aware of the plans for the Energy Centre that will feed the local energy network at Water Lane and is working proactively with the developer 1Energy to integrate this project with National Grid infrastructure including the new primary substation that is being planned for Peamore.

4.5. The detail of the representation and proposed response is presented in the table below.

Issue	Element of the plan (policy or paragraph)	Organisation's representation	ECC comment	Organisation's comment	Final position
Climate change	Policy CC3: Local energy networks	NGED does not object to the proposed use of local energy networks for	The City Council recognises the importance of ensuring that there is sufficient National Grid capacity to	No further comments.	No modifications to Policy

		development proposals and development areas within the City. However, the provision of local energy networks remains reliant on availability of capacity within the National Grid. Capacity within the National Grid serving Exeter is particularly limited and represents a significant constraint to the delivery of new developments until critical reinforcements of the grid are delivered. The delivery of these reinforcements is not scheduled to take place until at least 2036 – 2041 and these timescales cannot be relied upon until planning permission is secured for the necessary infrastructure. The provision of local energy networks does not circumvent the need to deliver the necessary grid reinforcements.	accommodate the development that is planned for through the Exeter Plan (including the demand arising from local energy networks), and commits to working proactively with NGED to safeguard existing infrastructure and to facilitate a supportive environment for NGED to deliver the necessary infrastructure projects to meet the increasing demand for electricity. The City Council acknowledges that the provision of local energy networks does not circumvent the need to deliver the necessary grid reinforcements. The City Council welcomes the confirmation provided by NGED at the meeting on 27th August 2025 that NGED are aware of the proposal for an Energy Centre (which has planning committee resolution to grant consent subject to a pending s106 agreement) to supply a local energy network at Water Lane, and that NGED are working together with the developer 1Energy to integrate the proposal with NGEDs planning infrastructure projects. In light of the above, no modifications to Policy CC3 are considered necessary.		CC3 are considered necessary.
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5.0 Strategic matters: Homes

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan:

- 9.3. NGED's representation dated 6th February 2025 raised the following matters relating to the homes chapter:

- There is limited capacity available within the existing grid network to serve new development in Exeter. The remaining capacity has largely been reserved by committed developments.
- Future planned developments, including proposed allocations and sites subject to planning permission, are reliant on retention of existing infrastructure and the delivery of major new infrastructure to maintain and increase capacity within the grid.
- The infrastructure projects which are needed to provide additional capacity are only expected to be provided by 2036-41 as a best case scenario.

9.4. At a meeting between the City Council and NGED on 27th August 2025, NGED outlined an updated position in relation to capacity which included that:

- NGED are proactively planning to meet the growth in electricity demand arising from new housing and economic growth, and from the shift towards net zero.
- There is a need for local authorities to keep NGED informed of planned developments, to safeguard existing National Grid infrastructure, and to work proactively with NGED in relation to planned infrastructure investment projects.
- While there remains a need for a conservative approach to development in relation to National Grid capacity, NGED has plans in place that will, subject to obtaining the necessary consents, deliver the infrastructure reinforcements needed to provide the additional capacity.
- A new Bulk Supply Point (132kV to 33kV) is needed and, although the solution for this has needed to be revised after a planning application was refused for a site near Matford in Teignbridge, a more complete, overall approach is being advanced through a site identified in East Devon, east of the M5. Subject to the necessary consents, this is expected to be delivered by around 2030, ahead of the timeframe of 2036-2041 previously estimated within the City Council's Infrastructure Delivery Plan and referred to within NGED's Regulation 19 representation.
- The necessary 132kV reinforcements are underway and are expected to be completed within 2-3 years, ahead of the timeframe of 2036-2041 previously estimated within the City Council's Infrastructure Delivery Plan and referred to within NGED's Regulation 19 representation.
- A new primary substation is being planned at Peamore in Teignbridge and, subject to the necessary consents, is estimated for completion by 2028.
- Subject to obtaining the necessary consents for the abovementioned infrastructure projects, and subject to existing infrastructure being safeguarded, NGED are satisfied that there will be sufficient grid capacity to accommodate the Exeter Plan's housing requirement of 642 homes per year as set out in Policy H1.

9.5. The detail of the representation and proposed response is presented in the table below.

Issue	Element of the plan (policy or paragraph)	Organisation's representation	ECC comment	Organisation's comment	Final position
Homes	Policy H1: Housing requirement	Policy H1 establishes the housing requirement of 13,975 homes to be delivered over the plan period. NGED has advised Exeter City Council of the limited capacity available within the existing grid network to serve new development in Exeter. The remaining capacity has largely been reserved by committed developments. Future planned developments, including proposed allocations and sites subject to planning permission, are reliant on retention of existing infrastructure and the delivery of major new infrastructure to maintain and increase capacity within the grid. To ensure the Local Plan is effective in delivering housing development, in accordance with Policy H1, its policies	The City Council recognises the importance of ensuring that there is sufficient National Grid capacity to accommodate the development that is planned for through the Exeter Plan, and commits to working proactively with NGED to safeguard existing infrastructure and to facilitate a supportive environment for NGED to deliver the necessary infrastructure projects to meet the increasing demand for electricity. The Exeter Plan includes policies that will contribute to the safeguarding of existing National Grid infrastructure: • Policy D1, which sets out design principles that will apply throughout Exeter City, requires developments to "Adopt a comprehensive response to existing site constraints, utilities and infrastructure provision". • Policy SBA1, which is the site allocation policy for Water Lane, safeguards existing infrastructure through criterion H which requires "Appropriate measures to respond to, and ensure the continued operation of, the gas and electricity infrastructure network across the site".	No further comments.	No modifications to Policy H1 are considered necessary. The proposed updates to the City Council's Infrastructure Delivery Plan are agreed.

		must ensure that existing grid infrastructure is safeguarded and the provision of new infrastructure including overhead lines, which will be critical to the delivery of increased power supply, are supported. The Infrastructure Delivery Plan identifies the critical infrastructure which must be delivered to achieve the necessary enforcements to the national grid to supply future development. The IDP anticipates delivery of the infrastructure at the end of the plan period, between 2036-2041. NGED advises that this is the best case scenario and is subject to identification of suitable locations and approval by the relevant local authorities for the necessary infrastructure. Prior to completion of these critical works, the delivery of new housing will be severely limited by the capacity of the existing grid network.	The Exeter Plan is supported by an Infrastructure Delivery Plan (IDP) in which National Grid projects have been included as Critical infrastructure. Following discussions with NGED on 27th August 2025, the IDP will be updated as follows: • Exeter main grid supply point: 132kv reinforcements: The previously estimated delivery timeframes of 2036-41 will be updated to 2026-31 to reflect the progress NGED has made with these ongoing works. • New bulk supply point: 132 to 33kv: The previously estimated delivery timeframes of 2036-41 will be updated to 2026-31 to align with NGEDs expected delivery of the planned solution. The cost estimate will be updated from £10,000,000 to £39,000,000. • A new primary substation at Peamore in Teignbridge will be included as an additional National Grid project with a cost estimate of £6-8,000,000 and a delivery timeframe of 2026-2031. The City Council welcomes NGEDs updated timeframes for the delivery of these critical infrastructure projects which will help alleviate potential capacity constraints for Exeter.		
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		In the absence of adequate infrastructure to support the timely delivery of new homes to meet the housing requirement, Policy H1 is ineffective and therefore unsound.	The City Council also welcomes the clarification provided by NGED at the meeting on 27th August 2025 that, subject to the safeguarding of existing National Grid infrastructure and the delivery of these necessary infrastructure projects, there is expected to be sufficient grid capacity to accommodate the Exeter Plan's housing requirement of 642 homes per year. No modifications to Policy H1 are therefore considered necessary.		
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6 Strategic matters: Economy and jobs

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

- 6.3 No representations were raised regarding the Economy and jobs chapter at Regulation 19 Publication stage.

7 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

8 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

9 Strategic matters: Natural environment

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

10 Strategic matters: History and heritage

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

11 Strategic matters: Culture and tourism

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

12 Strategic matters: High quality places and design

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

- 12.3 No representations were raised regarding the 'High quality places and design' chapter at Regulation 19 Publication stage.

13 Strategic matters: Health and wellbeing

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

14 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

- 14.3 No representations were raised directly responding to the policies or supporting text within the 'Infrastructure and facilities' chapter at Regulation 19 Publication stage.
- 14.4 NGED's representation raised the following matters which relate to infrastructure planning for electricity in Exeter more generally:
- The need for local authorities to inform NGED of future developments by responding annually to the Distribution Future Energy Scenarios (DFES) process.
 - The need for local authorities to contact NGED as early as possible in the plan-making process to establish whether capacity exists in the grid to accommodate planned development.

- Where land is allocated, priority should be given to retention of high voltage overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
- Where necessary, early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible
- Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
- For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines and safeguarding of land to accommodate new sub-stations, where necessary, with the agreement of NGED.

- 14.5 At the meeting between the City Council and NGED on 27th August 2025, NGED advised that the City Council's response to the DFES process for 2025 has not been received. It is regrettable that no response has been provided to the DFES process for 2025, and the City Council commits to ensuring that a response is provided to the DFES process for 2026. Given that NGED typically send the DFES request in May/June of each year, this timeframe has the potential to align well with the estimated timing for the examination of the Exeter Plan, and there may therefore be some additional certainty following examination around site allocations and the quantum of development expected to come forward on each allocated site.
- 14.6 It is also noted that, at a meeting between the City Council and NGED on 22nd October 2024, the City Council explained the Exeter Plan's housing requirement of 642 homes per annum and described the sites proposed for allocation in the Exeter Plan to ensure that NGED had advance notice of this prior to the Regulation 19 consultation.
- 14.7 The Exeter Plan seeks to safeguard existing infrastructure through Policy D1 which applies to all developments, and Policy SBA1 which applies to the Water Lane allocation:
- Criterion L of Policy D1 requires developments to "Adopt a comprehensive response to existing site constraints, utilities and infrastructure provision".
 - Criterion J
- 14.8 At the meeting between ECC and NGED on 27th August 2025, upcoming National Grid infrastructure projects in the wider Exeter area were discussed:
- Reinforcements to Exeter's 132kV network are underway and are expected to be completed by around 2028.

- The new bulk supply point (expected to be in East Devon) is estimated to be delivered according to an earlier timeframe, with the project provisionally estimated to be developed during around 2030 to 2031 subject to the necessary sign-offs and consents. NGED also provided an updated cost estimate of £39,000,000.
- NGED are planning the delivery of a new primary substation outside of the city at Peamore in Teignbridge, and provided an estimated delivery timeframe of up to 2028 and cost estimate of £6-8,000,000.
- NGED are liaising with the developers of the energy centre at Water Lane which will feed a local energy network. The energy centre has planning committee resolution to grant consent subject to a pending Section 106 Agreement.

14.9 No suggested modifications to the 'Infrastructure and facilities' chapter are considered necessary.

14.10 The following updates to the City Council's Infrastructure Delivery Plan (which forms part of the evidence base for the Exeter Plan) have been agreed (insertion of new text shown in red, deletion of existing text shown in red with strikethrough):

Project name and brief description	Infrastructure theme	Classification (related to development)	Estimated project cost	Delivery partners	Potential funding sources (detail TBC). Funding could also include scheme development	Estimated delivery period
Exeter main grid supply point: 132kv reinforcements	Utilities	A. Critical	£10,000,000	ECC, National Grid	National Grid	2026-2031 2036-2041
New bulk supply point: 132 to 33kv east of Exeter (outside of the city) in East Devon	Utilities	A. Critical	£10,000,000 £39,000,000	ECC, National Grid	National Grid	2026-2031 2036-2041
New primary substation (outside of the city) at Peamore in Teignbridge	Utilities	A. Critical	£6,000,000 to 8,000,000	National Grid	National Grid	2026-2031

15 Site allocations

Broad summary of chapter content

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

Addressing the response of NGED to the Regulation 19 Exeter Plan

- 15.5 No representations were raised directly responding to any allocations, policies or supporting text within the 'Site allocations' chapter at Regulation 19 Publication stage.
- 15.6 NGEDs representation provided guidance on the approach that should be taken for sites that are affected by overhead power lines and pylons, including:
- Local planning authorities have a duty to safeguard the operation of National Grid's infrastructure.
 - In the majority of cases existing infrastructure, including overhead power lines and pylons, should be retained in situ.
 - While lower voltage power lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without concern, if allocations affect power lines supported by steel lattice towers, particularly 132kV, local planning authorities should

engage with NGED at the earliest opportunity to confirm whether the lines can be accommodated within the development site, or whether it would be viable and feasible to divert and/or underground overhead lines.

- The additional development costs, timeframes and visual impacts arising from diversion and/or undergrounding should be taken into account by LPAs when allocating sites.
- A 10m wide corridor of open ground is required above undergrounded lines.
- The retention of overhead lines in situ provides greater opportunities to deliver an efficient and effective masterplan.

- 15.7 At the meeting between the City Council and NGED on 27th August 2025, it was noted that the Water Lane allocation (SBA1) is affected by overhead power lines, but that their existing siting will not have a significant impact on the development area of the allocation.
- 15.8 At a previous meeting between the City Council and NGED on 22nd October 2024 (prior to the Regulation 19 consultation), it was noted that the site hosts an existing bulk supply point (BSP). NGED advised that it would be very difficult to relocate the BSP at Water Lane, and the City Council confirmed that there was no expectation for the BSP to be moved.
- 15.9 Policy SBA1, which is the site allocation policy for Water Lane, safeguards existing infrastructure through criterion H which requires “Appropriate measures to respond to, and ensure the continued operation of, the gas and electricity infrastructure network across the site”.
- 15.10 No modifications to the Exeter Plan are considered necessary in relation to the existing National Grid infrastructure hosted at Water Lane.

16 Sustainability Appraisal and Habitat Regulations Assessment

Explanation of the SA and HRA

- 16.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 16.2 SA and HRA reports were provided for consultation alongside the Publication Regulation 19 draft of the Exeter Plan. Representors were able to provide representations on both these documents.

Addressing the response of NGED to the Regulation 19 Exeter Plan

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

17 Governance, review and signoff

- 17.1. The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon, or where there are areas of disagreement, this statement documents the issue, and that both parties confirm their respective position.
- 17.2. It is agreed that these discussions will inform the Examination of the Exeter Plan (the local plan). Both parties will continue to work collaboratively to meet the Duty to Cooperate obligations and will both continue to work proactively on the key strategic cross boundary issues identified in this document.

Signed:



Name: Roger Clotworthy

Position: Service Lead, City Development, Exeter City Council

Signed:



Name: Emily Taylor

Position: Regional Decarbonisation Manager, National Grid Electricity Distribution

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

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