

Exeter Plan

Statement of Common Ground

Exeter City Council and Mid Devon District Council

April 2025

Exeter City Council

Civic Centre
Paris Street
Exeter
EX1 1JN



Contents

1.0	Introduction	3
2.0	Joint Strategy: Our Shared Coordinates	5
3.0	Strategic Matters: Spatial Strategy	6
4.0	Strategic Matters: Climate Change	10
5.0	Strategic Matters: Homes	11
6.0	Strategic Matters: Economy And Jobs	13
7.0	Strategic Matters: Retail And The Future Of Our Centres	15
8.0	Strategic Matters: Sustainable Transport And Communications	16
9.0	Strategic Matters: Natural Environment	19
10.0	Strategic Matters: History And Heritage	20
11.0	Strategic Matters: Culture And Tourism	21
12.0	Strategic Matters: High Quality Places And Design	22
13.0	Strategic Matters: Health And Wellbeing	23
14.0	Strategic Matters: Infrastructure And Facilities	24
15.0	Site Allocations	26
16.0	Sustainability Appraisal And Habitats Regulation Assessment	27
17.0	Governance, Review And Signoff	28

Appendix A: Strategic matters: Summary matrix

1.0 Introduction

- 1.1. 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.
- 1.2. 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.
- 1.3. Mid Devon District Council provided a series of representations to the Regulation 19 Plan. These are considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Mid Devon District Council have cooperated on strategic matters 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.
- 1.5. 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.
- 1.6. The detailed comments from Mid Devon District Council are considered in Exeter Plan chapter order in this Statement of Common Ground. However, as an over-arching comment, the District Council representation stated the following:

'Overall, Mid Devon District Council views the plan to be sound, legally compliant and to comply with the duty to cooperate. The council continues to be broadly supportive of the emerging Exeter Plan: Publication Plan'.

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>

- 1.7. This demonstrates that there has been joint working between Exeter City Council and Mid Devon District Council since the outset of plan-making.

2.0 Joint Strategy: Our shared coordinates

- 2.1. A Joint Strategy called Our Shared Coordinates⁵ has been prepared for the area covered by Exeter, East Devon, Mid Devon and Teignbridge Councils. This follows decisions taken by each of the four Councils in 2021. The document has been prepared in partnership with Devon County Council.
- 2.2. The Joint Strategy is a non-statutory document that reflects the ambitions and proposals of existing and emerging Local Plans across the area. It sets out shared ambitions, linkages and priorities across a range of strategic planning matters and identifies a high-level list of infrastructure matters that have cross-boundary significance for supporting the delivery of planned new homes, jobs, services, transport and other development.
- 2.3. The Joint Strategy demonstrates the commitment to ongoing joint working across the area on strategic matters. It was approved by the City Council's Executive in November 2023. It has also been approved by East Devon, Mid Devon and Teignbridge District Councils.
- 2.4. Mid Devon District Council supports the City Council's approach towards strengthening cross boundary collaboration as demonstrated by their representation in relation to paragraph 1.14 of the Exeter Plan, stating that:

'It is consistent with national planning policy. We support the inclusion of a new section "The local planning context" and specifically paragraph 1.14 which recognises the need for collaborative planning efforts between Exeter and other District Councils...for creating a cohesive development strategy for the wider area. While this is consistent with paragraphs 24 to 26 in the section "maintaining effective cooperation" in the previous version of the NPPF (December 2023) against which it is intended the Exeter Plan will be examined, it is also consistent with the Government's objective to promote a more strategic approach to planning by strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning'.

The inclusion of paragraph 1.14 is consistent with paragraphs 24 to 26 in the section "maintaining effective cooperation" in the previous version of the NPPF (December 2023) against which it is intended the Exeter Plan will be examined'.

⁵ Our Shared Coordinates: A joint strategy for East Devon, Exeter, Mid Devon and Teignbridge. EDDC, ECC. MDDC and TDC in partnership with Devon County Council. January 2024.

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 Mid Devon District Council to the Regulation 19 Exeter Plan

3.5 The detailed representations from Mid Devon District Council related to the spatial strategy are discussed in the following table.

Issue	Element of the plan (policy or paragraph)	MDDC's representation	ECC comment	MDDC's comment	Final position and suggested plan modification
Spatial Strategy	S1: Spatial Strategy (clause 2)	Sound. It is consistent with national planning policy. We support the inclusion of a new Clause 2 "Working with neighbouring councils to ensure that the employment needs of the wider functional economic area are met". While this is consistent with paragraphs 24 to 26 in the section "maintaining effective cooperation" in the previous version of the NPPF(December 2023) against which it is intended the Exeter Plan will be examined, it is also consistent with the Government's objective to promote a more strategic approach to planning by	Noted - Support welcomed	N/A	No modifications required

		strengthening cross-boundary collaboration, ahead of legislation to introduce mandatory mechanisms for strategic planning. The inclusion of Clause 2 in Policy S1 is consistent with paragraphs 24 to 26 in the section “maintaining effective cooperation” in the previous version of the NPPF (December 2023) against which it is intended the Exeter Plan will be examined.			
	S1: Spatial Strategy (clause 3)	Sound It is consistent with national planning policy. We support the inclusion of Clause 3 with reference to "enabling traditional" forms of employment, which is consistent with the NPPF (December 2023) against which it is intended the Exeter Plan will be examined, paragraph 87, which states planning policies and decisions should recognise and address the specific locations requirements of	Noted - Support welcomed	N/A	No modifications required

		different sectors" (our emphasis in bold). Traditional forms of employment provision will need to be supported alongside new forms of employment provision.			
--	--	---	--	--	--

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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 4.3 No representations were raised by Mid Devon District Council regarding Climate Change chapter at Regulation 19 Publication stage.

5.0 Strategic matters: Homes

Broad summary of chapter content

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

Addressing the response of Mid Devon District Council to the Regulation 19 Exeter Plan

5.3 The detailed representation from Mid Devon District Council related to housing is discussed in the following table.

Issue	Element of the plan (policy or paragraph)	MDDC's representation	ECC comment	Organisation's comment	Final position and suggested plan modification
Housing requirement	H1: Housing requirement	Sound. We support Policy H1 which makes clear Exeter City will meet its housing requirement in full.	Noted - Support welcomed	N/A	No modifications required

6.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 6.3 The detailed representation from Mid Devon District Council related to economy and jobs is discussed in the following table.

Issue	Element of the plan (policy or paragraph)	MDDC's representation	ECC comment	MDDC's comment	Final position and suggested plan modification
Economic development needs	Paragraph 7.3 – 7.6	Sound We support the inclusion of the Economic Development Needs section in the plan, and its paragraphs 7.3 to 7.6 which recognise the wider Functional Economic Market Area consisting Exeter, East Devon, Mid Devon and Teignbridge, and commitment to continuing to work together to ensure the continued economic success of the wider area. This supports the soundness of this part of the plan as being positively prepared.	Noted - Support welcomed	N/A	No modifications required

7.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 7.3 No representations were raised by Mid Devon District Council regarding retail and the future of our centres at Regulation 19 Publication stage.

8.0 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 infrastructures
 - STC8: Motorway service area; and
 - STC9: Digital communications.

Addressing the response of Mid Devon District Council to the Regulation 19 Exeter Plan

- 8.3 The detailed representations related to sustainable transport and communications are discussed in the following table.

Issue	Element of the plan (policy or paragraph)	MDDC's representation	ECC comment	MDDC's comment	Final position and suggested plan modification
Active travel	STC3: Supporting active travel	Sound We support the inclusion of reference to the 'Boniface Trail' in clause a) of Policy STC3. This is consistent with Policy T2 Crediton to Exeter Cycle Path in the 'made' Crediton Neighbourhood Plan, proposed route reference E18 in the adopted Exeter Local Cycling and Walking Infrastructure Plan (LCWIP) January 2024, proposed Route 6 – Boniface Trail in the consultation draft Devon Countywide LCWIP September 2024 and Section 11: Our action plan for Exeter measure for feasibility investigations of initial sections of Boniface Trail in the Devon Local Transport Plan 4 Consultation Draft October 2024. This supports the soundness of this part of the plan through being justified.	Noted - Support welcomed	N/A	No modifications required

Public transport	STC4: Supporting public transport	Sound The inclusion of the provision "The City Council will support the enhancement of rail provision in the city: b. By supporting continued delivery of the Devon Metro programme including at least half hourly frequencies on rail lines into Exeter" is welcomed and supported, recognising the need for a sustainable means of travel and interconnectivity between Exeter and neighbouring local authority areas. This supports the soundness of this part of the plan through being positively prepared.	Noted - Support welcomed	N/A	No modifications required
Motorway services	STC8: Motorway service area	Sound We support the inclusion of the sentence which states "This would require collaboration between National Highways, Devon County Council and neighbouring local planning authorities". This supports the soundness of this part of the plan through being positively prepared.	Noted - Support welcomed	N/A	No modifications required

9.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 9.3 No representations were raised by Mid Devon District Council regarding Natural Environment chapter at Regulation 19 Publication stage.

10.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 10.3 No representations were raised by Mid Devon District Council regarding the history and heritage chapter at Regulation 19 Publication stage.

11.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 11.3 No representations were raised by Mid Devon District Council regarding the culture and tourism chapter at Regulation 19 Publication stage.

12.0 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 High quality places and design chapter to the Regulation 19 Exeter Plan

- 12.3 No representations were raised by Mid Devon District Council regarding the high quality places and design chapter at Regulation 19 Publication stage.

13.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 13.3 No representations were raised by Mid Devon District Council regarding the health and wellbeing chapter at Regulation 19 Publication stage.

14.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 14.3 The detailed representations related to Infrastructure and facilities are discussed in the following table.

Issue	Element of the plan (policy or paragraph)	MDDC's representation	ECC comment	MDDC's comment	Final position and suggested plan modification
Infrastructure and facilities: Cross - boundary discussions	Paragraph 15.2	Sound We support the inclusion of the sentence "The City Council will continue	Noted - Support welcomed	N/A	No modifications required

		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. Work with the other District Councils and Devon County Council will be particularly important” in paragraph 15.2, which recognises the need to continue discussions between Exeter City Council and other District Councils and Devon County Council relating to cross-boundary infrastructure. This supports the soundness of this part of the plan through being positively prepared.			
--	--	--	--	--	--

15.0 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 Mid Devon District Council to the Regulation 19 Exeter Plan

- 15.5 No representations were raised by Mid Devon District Council regarding the site allocations chapter at Regulation 19 Publication stage.

16.0 Sustainability Appraisal and Habitats Regulation 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.

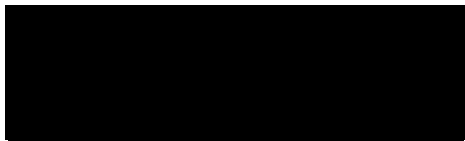
Addressing the response of Mid Devon District Council to the Regulation 19 Exeter Plan

- 16.3 No representations were provided by Mid Devon District Council regarding the Sustainability Appraisal and Habitat Regulations Assessment at Regulation 19 Publication Stage.

17.0 Governance, review and signoff

- 16.1. The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon regarding the Exeter Plan.
- 16.2. 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: Head of City Development, Exeter City Council

Signed: *Tristan Peat*

Name: Tristan Peat

Position: Forward Planning Team Leader, Mid Devon District Council

Appendix A:**ECC and Mid Devon District Council: Strategic matters summary matrix**

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