

Exeter Plan

Statement of Common Ground

Exeter City Council and Sport England

January 2026

Exeter City Council

Civic Centre
Paris Street
Exeter
EX1 1JN



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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. Sport England 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.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Sport England have cooperated on strategic matters throughout 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.
- 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. Where suggested modifications to the Exeter Plan have been agreed through this Statement of Common Ground, footnotes have been used to indicate whether the modification has already been included in the Core Submission Document [CSD-03: Exeter Plan schedule of suggested modifications](#) which was included with the submission of the Exeter Plan to the Planning Inspectorate on 26 September 2025, or whether it is a new or revised modification not included in the submitted schedule of suggested modifications.

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>

2.0 Strategic matters: Spatial strategy

Broad summary of chapter content

- 2.1 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.
- 2.2 The spatial strategy chapter includes two policies:
- S1: Spatial strategy; and
 - S2: Liveable Exeter Principles.
- 2.3 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.
- 2.4 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 Sport England to the Regulation 19 Exeter Plan

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

3.0 Strategic matters: Climate change

Broad summary of chapter content

- 3.1 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.
- 3.2 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 Sport England to the Regulation 19 Exeter Plan

- 3.3 No representations were raised regarding the climate change chapter at Regulation 19 Publication stage.

4.0 Strategic matters: Homes

Broad summary of chapter content

- 4.1. 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.
- 4.2. 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 Sport England to the Regulation 19 Exeter Plan:

- 4.3. No representations were raised regarding the 'Homes' chapter at Regulation 19 Publication stage.

5 Strategic matters: Economy and jobs

Broad summary of chapter content

- 5.1 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.
- 5.2 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 Sport England to the Regulation 19 Exeter Plan

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

6 Strategic matters: Retail and the future of our centres

Broad summary of chapter content

- 6.1 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.
- 6.2 The retail and future of our centres chapter 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 Sport England to the Regulation 19 Exeter Plan

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

7 Strategic matters: Sustainable transport and communications

Broad summary of chapter content

- 7.1 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.
- 7.2 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 Sport England to the Regulation 19 Exeter Plan

- 7.3 Sport England's representation noted the reference in Paragraph 9.19 to active design and encouraged use of Sport England's Active Design Checklist.
- 7.4 The detail of the representation and the proposed response is set out in the table below.

Issue	Element of the plan (policy or paragraph)	Organisation's representation	ECC comment	Organisation's comment	Final position
Sustainable transport and communications	Paragraph 9.19	Active Design will help improve health and well-being as well as addressing climate change and promoting active travel – more walking and cycling. This has considerable understanding with the Plan including design and a liveable city. Sport England would encourage development in Exeter be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the Active Design checklist.	Policy STC3 and paragraph 9.19 of the supporting text seek to ensure that development accords with active design principles. Similarly, Policies SBA1-5 also require that each of the five strategic brownfield allocations be delivered with a layout that accords with active design principles. The City Council welcomes Sport England's Active Design Checklist as a delivery tool for active design. Use of the checklist is considered to be a more detailed operational matter for consideration by planning officers as part of the development management process, and something that may be better considered for incorporating into the City Council's 'local validation checklist' rather than as a requirement to be set out in the Exeter Plan.	Sport England welcomes the Council's approach to the good practice of encouraging environments to be more welcoming in promoting walking, cycling and other Active Travel in a liveable City as suggested by Active Design. Sport England would be keen to work on future development proposals in the City to ensure Active Design is considered and delivered.	No modifications considered necessary.

8 Strategic matters: Natural environment

Broad summary of chapter content

- 8.1 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.
- 8.2 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 Sport England to the Regulation 19 Exeter Plan

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

9 Strategic matters: History and heritage

Broad summary of chapter content

- 9.1 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.
- 9.2 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 Sport England to the Regulation 19 Exeter Plan

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

10 Strategic matters: Culture and tourism

Broad summary of chapter content

- 10.1 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.
- 10.2 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 Sport England to the Regulation 19 Exeter Plan

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

11 Strategic matters: High quality places and design

Broad summary of chapter content

- 11.1 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.
- 11.2 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 Sport England to the Regulation 19 Exeter Plan

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

12. Strategic matters: Health and wellbeing

Broad summary of chapter content

- 12.1 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.
- 12.2 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 Sport England to the Regulation 19 Exeter Plan

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

13 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

- 13.1 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.
- 13.2 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 Sport England to the Regulation 19 Exeter Plan

- 13.3 Sport England's representation dated 6th February 2025 raised the following matters in relation to the 'Infrastructure and facilities' chapter:
- 13.4 Local plan evidence base. The need for an up to date local plan evidence base in accordance with the requirements of Paragraph 103 of the NPPF (Dec 2023):
- The City Council's Playing Pitch Strategy (PPS) needs to be updated and there needs to be regular delivery meetings of the PPS.
 - The City Council needs to have a Built Sport Facilities Strategy (BSFS). The BSFS needs to be based on data no older than 5 years in order to be considered up to date.

- 13.5 Policies for the protection of sport and recreation facilities including playing fields. Sport England object to the criteria in Policy IF4 and state that the policy needs to be re-written to accord with the criteria in Paragraph 103 of the NPPF (Dec 2023).
- 13.6 The City Council and Sport England have held meetings on 1st July 2025, 19th September 2025, 26th September 2025, 19th January 2026 as well as regular email correspondence, to discuss and seek to resolve these matters.
- 13.7 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
Infrastructure and facilities	Policy IF4: Open space, play areas, allotments and sport	Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields): "Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; b) the loss resulting from the proposed development would be	The City Council will suggest main modifications for the policy text to be amended to read: "Existing open space, play areas, local green spaces, allotments, playing pitches and sports facilities will be protected unless it can be robustly demonstrated that: a. An assessment has been undertaken which has clearly shown	SE cannot agree IF4 changes. Whilst changes have been made to IF4 including an addition - criterion c, the policy as drafted and supporting paras (para 15.41 and 15.42) do not protect playing fields / sports / sports buildings in accordance with para 104 of the NPPF. And for playing fields, in compliance with Sport England's Playing Fields Policy. It is not	Detailed discussions have not fully resolved this issue and any further consideration may be conducted through the Exeter Plan examination. The respective final positions of ECC and Sport England are summarised below.

		replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.” Sport England would be very concerned if any existing sport & recreation land & buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility. This includes playing fields used by education (public and private) and playing fields in private ownership (e.g. Middlemoor police site, St Leonards playing fields/Deaf Academy) and local authority sites (e.g. Grace Road Playing Fields) in Exeter. Sport England considers proposals affecting playing fields in light of the National Planning Policy Framework (NPPF) (in particular Para. 104) and against its own playing fields policy, which states:	that there is a proven excess of the existing facility in the area it serves, and there is no reasonable prospect of securing an appropriate alternative community use of the site; or a. They are no longer fit for purpose; or b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future; or c. They are surplus to requirements; or d. There are alternative appropriate facilities in the area to meet community needs; and e-b. Sufficient alternative or	clear in terms of redevelopment should this be loss of playing field land? As currently drafted there is no specific need for replacement provision to at least equivalent or more in quantity like para 104b. In fact the proposed wording is not tight in relation to quantity and allows for ambiguity in application which I'm sure is not the intent of the Council. So the time is now to tighten the policy up. Firstly we welcome that the assessment should/will include “(considering both quantity and quality)”. The term “considering” is not as strong as drafted in the NPPF which without doubt seeks open space, sport	ECC final position: ECC considers that the modifications the council has suggested to Policy IF4 and the supporting text, as set out in the Scheduled of Suggested Modifications (CSD-03) and in this table, would ensure the soundness of the policy. Sport England final position: Can the text for criterion b) be amended to read: “Sufficient alternative or improved provision for the loss resulting from the
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		“Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of: • all or any part of a playing field, or • land which has been used as a playing field and remains undeveloped, or • land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.” Sport England’s Playing Fields Policy and Guidance document can be viewed via the link here. We continue to OBJECT to policy IF4: Open space, play areas, allotments and sport if for sport and recreation including playing pitches fields the local plan policy deviates from para 104 of the NPPF and Sport England Playing Fields Policy to	improved provision will be made in a suitable location to serve the local community, which clearly outweighs the loss (considering both quantity and quality), and will be provided to a timescale that avoids any significant break in use; or c. the development is for alternative open space, play areas, allotments and sport provision, the benefits of which clearly outweigh the loss of the current or former use⁵. Development proposals for new or improved⁶ open space, play areas,	buildings and land including playing fields to be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Why is this addition in brackets? Sport England have concerns over the proposed wording of criterion b) and c) goes beyond para 104 and could allow for developments to be acceptable to the Local Plan policy but be in conflict with National Planning policy. Like the loss of the Grace Road Playing Fields (see below). Exeter does not have a proven excess of playing field land. Grace Road Playing Fields was not	proposed development will be made in a suitable location to serve the local community, which clearly outweighs the loss (considering would be replaced by equivalent or better provision in terms of both quantity and quality), and will be provided to a timescale that avoids any significant break in use. Further amendments to criteria a and c can be explored.
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⁵ These suggested modifications to Policy IF4 include new amendments (the addition of “considering both quality and quantity”; the addition of criterion c.) to those previously included as SMM87 in [CSD-03: Exeter Plan schedule of suggested modifications](#)

⁶ This suggested modification (the addition of “or improved”) is included as SMM88 in [CSD-03: Exeter Plan schedule of suggested modifications](#)

		protect playing fields and creates loopholes for developers to exploit. Disappointingly we note the IF4 criteria set out in this Reg 19 document: a. They are no longer fit for purpose (<u>who and how is this determined?</u>); or b. They are no longer viable and there is no reasonable prospect of the site being used for a community use in the future (<u>who decides viability? This could encourage playing field sites being locked up and left for many years even if need is identified in a PPS</u>); or c. They are surplus to requirements (<u>who and how is this determined?</u>); or d. There are alternative appropriate facilities in the area to meet community needs (<u>who and how is this determined?</u>); and e. Sufficient alternative or improved provision will be made in a suitable location to serve the local community which clearly outweighs the loss. (<u>who and how is this determined?</u>)	local green spaces, allotments, playing pitches and sports facilities will be supported where they are: ...” The City Council will also suggest a modification for the following to be added after paragraph 15.39 of the supporting text: “15.40 Where a proposal seeks to justify the redevelopment of an existing sports facility on the basis of there being a lack of need, this will be assessed against the PPS and Built Sports Facilities Strategy in relation to current and future demand. If the proposal relates to a sports facility of a type that is not	shown to be replaced. No effort to. It was lost to a non sport development. <u>It went totally against para 104 of the NPPF.</u> Sport England has concerns with criterion a) as drafted as this differs from the NPPF. Criterion c in the NPPF sets out a situation where there is no excess of provision and no replacement but an opportunity where the benefits of another sporting opportunity outweighs the loss of existing open space, sport and recreation. This is not covered in IF4 criterion c which enables changes for different open spaces to be changed with flexibility.	
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		As written the scope of IF4 facility types are very wide and could be confusing to the reader/implementation with developers mixing 'marketing a site' when this is not applicable to playing fields / leisure buildings. Greater clarity needed that Exeter Policy IF4 is in line with the NPPF para 104 regarding sport and recreation including playing fields. Action re-write Policy IF4 to be compliant with para 104 of the NPPF.	included in the PPS or Built Facilities Strategy, the proposal will need to be supported by an up-to-date assessment of current and future demand carried out in accordance with Sport England guidance.⁷	We request that the Policy IF4 is redrafted again to be in compliance with para 104 of the NPPF to protect and safeguard playing field land, sports land and buildings.	
Infrastructure and facilities	Paragraphs 15.37 to 15.38	The (latest) National Planning Policy Framework (2024) states: "Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities	The City Council has commissioned consultants BELAP to review and update the Playing Pitch Strategy. The update is ongoing and is expected to be completed in early 2026. PPS Stage E delivery group meetings have been held on 21 May 2025 and 17	Sport England has been recently working with the Council and partners in relation to the Playing Pitch Strategy. We continue to help and guide the Council on the delivery of the work of the playing pitch strategy. There are many projects to work through to improve playing pitches in the	No modifications required. The City Council will continue to work with Sport England towards finalising the PPS Update, preparing a Built Sports Facilities Strategy, and delivering the strategies.

⁷ This suggested modification ("15.40 Where a proposal seeks to justify ... in accordance with Sport England guidance") is a new modification not included in the submitted [CSD-03: Exeter Plan schedule of suggested modifications](#)

		(including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.” Sport England’s view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches. (your ref para 15.37) We note the Council’s 2022 completed Playing Pitch Strategy (PPS) which covers pitch sports and tennis. No regular delivery meetings of the PPS have yet been held since completion which remains a concern. It is becoming a dated document and needs data refresh to keep it ‘live’ and robust. (your ref para 15.38) There is no up to date current Built Facility	September 2025, attended by representatives from the City Council, BELAP, Sport England and the National Governing Bodies for each sport. Following the update, the City Council will hold delivery group meetings every 6 months to work proactively with partners towards meeting the needs identified and implementing the actions set out in the updated PPS. The City Council is working to raise funds to develop a Built Facilities Strategy. The cost for the development of the strategy is expected to be in the	City and increase access to them. The Council needs to be seen to deliver pitch improvements on the ground to meet the needs of community sport. The lack of a Built Facility assessment and Strategy continues to be a concern for Sport England. We acknowledge the Council’s plan to undertake such a study and Strategy. We will continue to monitor the projected timeline of a project start in 2026 and the projected end date. The PPS and Built Facilities Strategy will give the Council evidence from sport to influence the planning obligations to be sought from new	
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		assessment (or strategy) for swimming pools, sports halls, golf courses, bowls, athletics tracks, cycling, equestrian, motor sports etc which the Council. Currently no evidence for the development plan to be based on. In turn, no document to inform planning application decision making in a plan led planning system. The Playing Pitch Strategy for 'in date' the data in studies should not be more than 3 years old (from the date of the data and not the adoption date). The Built Sport Facility Strategy for 'in date' the data in studies should not be more than 5 years old (from the date of the data and not the adoption date). Action – Council to work on their sport, land and buildings, open space including playing fields assessment of need and strategies to be produced and kept up to date in line with para 103 of the NPPF.	region of £25,000. £10,000 has been set aside from the Local Plans budget, and the remaining funds are expected to be raised by the end of the 2025/26 financial year. Thereafter, the City Council will commission consultants in spring/summer 2026 to develop the strategy, and the strategy is expected to be provided by early 2027.	development proposals to meet the needs of the new population.	
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14 Site allocations

Broad summary of chapter content

- 14.1 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.
- 14.2 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.
- 14.3 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.
- 14.4 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 Sport England to the Regulation 19 Exeter Plan

- 14.5 Sport England's representation dated 6th February 2025 raised the following in relation to the 'Site allocations' chapter:
- 14.6 Strategic mixed used brownfield allocation SBA1 – Water Lane. Support improvements for sport to Bromhams Farm and Grace Road Playing Fields for sport / playing pitch use (bring back into use), activities like cycling and running alongside the river and canal to the Quay and beyond. Perhaps a café to encourage co-location of the changing rooms. What work will be carried out to inform this proposal?
- 14.7 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
Site allocations	Policy SBA1: Water Lane	Support improvements for sport to Bromhams Farm and Grace Road Playing Fields for sport / playing pitch use (bring back into use), activities like cycling and running alongside the river and canal to the Quay and beyond. Perhaps a café to encourage co-location of the changing rooms. What work will be carried out to inform this proposal?	Policy SBA1 includes, at criterion D, a requirement for the protection and enhancement of existing community and sports facilities in accordance with Policies IF3 and IF4, including the creation of Clapperbrook Hub at Bromham's Farm, provision of additional space for water related activities and safeguarding of the infrastructure needed to support strategic water related uses. This policy requirement also reflects the plans for this area as set out in Code W12 of the Liveable Water Lane Supplementary Planning Document. Sport England's support for this requirement is welcomed. The City Council is progressing these	Sport England welcomes the Council's approach to sport and enhancements at sites within the locality of the major allocation for new homes and population at Bromhams. We are disappointed that despite our objection to the loss of the Grace Road Playing Fields the Council has granted planning permission to an alternative development to that of its established playing field use without adequate mitigation to sport / playing field loss. No explanation has been given or mitigation plans shared with Sport England over the loss of the Grace Road playing fields. Until this planning permission is implemented – and there is a possibility it may not – the existing lawful use of the land is that of playing fields, and we hope that they might be able to be returned to this use to benefit the large housing developments being proposed/allocated in close proximity.	Detailed discussions have not fully resolved this issue, and any further consideration may be conducted through the Exeter Plan examination.

			proposals, including in relation to its own land holdings in the vicinity.	The use of Active Design principles in the future planning is welcomed.	
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15 Sustainability Appraisal and Habitat Regulations Assessment

Explanation of the SA and HRA

- 15.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 15.2 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.

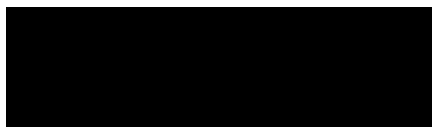
Addressing the response of Sport England to the Regulation 19 Exeter Plan

- 15.3 No representations were raised regarding the Sustainability Appraisal or the Habitat Regulations Assessment.

16 Governance, review and signoff

- 15.1. 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.
- 15.2. 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.

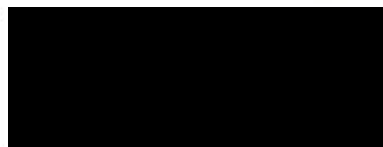
Signed:



Name: Roger Clotworthy

Position: Service Lead, City Development, Exeter City Council

Signed:



Name: Gary Parsons

Position: Planning Manager, Sport England

Appendix A:**ECC and Sport England: 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	X
Site allocations	X
Sustainability Appraisal	A
Habitat Regulations Assessment	A