

Exeter Plan

Statement of Common Ground

**Exeter City Council and Devon and Cornwall Police together with
the Office of the Police and Crime Commissioner (OPCC)**

April 2026

Exeter City Council

Civic Centre
Paris Street
Exeter
EX1 1JN



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, including the Regulation 19 publication in December 2024. The Plan was submitted to the Planning Inspectorate in September 2025 and the plan is progressing through the examination hearings in March and May 2026.
- 1.2. Devon and Cornwall Police (DCP) together with the Office of the Police and Crime Commissioner for Devon and Cornwall, and the Isles of Scilly (OPCC) submitted a representation on the Regulation 19 Plan by email on 6 February 2025. This representation covered the following parts of the Exeter Plan:
 - Chapter 15: Infrastructure and facilities – Policy IF3: Community Facilities.
 - Chapter 16: Site allocations – Policy SBA2: East Gate
- 1.3. The matters raised are considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Devon and Cornwall Police together with the OPCC have cooperated on strategic matters in the preparation of the Exeter Plan, with discussions continuing up to and during the examination hearing sessions.
- 1.5. This Statement of Common Ground has been prepared in accordance with paragraph 24 onwards of the NPPF¹ and the plan-making section of the Planning Practice Guidance².
- 1.6. The content of this statement of Common Ground has been informed by meetings between City Council officers and representatives of Devon and Cornwall Police which were held on and 19 January and 2 April 2026, together with a series of emails.

¹ Available at: <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>

2.0 Strategic matters: Infrastructure and facilities

Broad summary of chapter content

2.1 The infrastructure and facilities section of the plan includes five policies as follows:

- 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 Devon and Cornwall Police to the Regulation 19 Exeter Plan

2.2 Devon and Cornwall Police's representation dated 6 February 2025 raised the following matter in relation to the infrastructure and facilities chapter at Regulation 19 Publication stage:

- IF3: Community facilities and paragraph 15.18: Unsound.

2.3 The detail of the representation is available online on the examination website here: <https://exeter.gov.uk/media/kn5d2wa4/b-01-1-1.pdf>

2.4 In making the representation, Devon and Cornwall Police proposed modifications to the explanatory text in paragraph 15.18 and policy IF3 itself. These are set out and discussed in the table below. The insertion of new text is shown in red and deletion of existing text shown in red with strikethrough.

Element of the plan	Devon and Cornwall Police representation	ECC comment	Devon and Cornwall Police comment	Final position
Paragraph 15.18	Amend text as follows: 'Exeter has a wealth of services and facilities that are essential for the health, welfare, safety, security, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, healthcare, police buildings and other policing infrastructure, community halls, places of worship, pubs, libraries, space for children's services/community use and youth clubs. The protection of these facilities is of critical importance to our residents'.	The City Council would be content to amend paragraph 15.18 as follows: 15.18. Exeter has a wealth of services and facilities that are essential for the health, welfare, safety, security, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, healthcare, policing infrastructure, community halls, places of worship, pubs, libraries, space for children's services/community use and youth clubs. The protection of these facilities is of critical importance to our residents'. This would reflect the role of police infrastructure as community facilities.	DCP will accept the proposed amendments to paragraph 15.18, however, the inclusion of "wealth" in the context of police infrastructure is misleading.	The City Council and Devon and Cornwall Police agree to suggest a modification to text in paragraph 15.18 as follows: 15.18. Exeter has a wealth of services and facilities that are essential for the health, welfare, safety, security, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities include schools, healthcare, policing infrastructure, community halls, places of worship, pubs, libraries, space for children's services/community use and youth clubs. The protection of these facilities is of critical importance to our residents'.

Policy IF3: Community facilities	Amend text as follows: ‘Existing facilities, including buildings and land, that meet community, social, health, welfare, safety, security, education, spiritual, cultural, leisure and recreational needs (including Assets of Community value) will be protected, unless it can be demonstrated that...’ ‘Contributions towards additional or improved education provisions and other-community facilities will be sought from residential and commercial development proposals where necessary’.	The City Council would be content to amend Policy IF3 as follows: ‘Existing facilities, including buildings and land, that meet community, social, health, welfare, policing, education, spiritual, cultural, leisure and recreational needs (including Assets Of Community value) will be protected, unless it can be demonstrated that...’ This would reflect the role of police infrastructure and their need for protection. The City Council is not suggesting any modifications to respond to the revised text in relation to contributions. The text proposed by Devon and Cornwall Police could introduce wide ranging contributions, including for police infrastructure, for which there is insufficient evidence or justification.	DCP support the proposed amendment to include <i>“policing.”</i> Agreed. Devon and Cornwall Police’s final position relating to a potential amendment would be: ‘Contributions towards additional or improved education provision and other community facilities including police infrastructure will be sought from residential development proposals where necessary’.	The City Council and Devon and Cornwall Police agree to suggest a modification to text Policy IF3 as follows: ‘Existing facilities, including buildings and land, that meet community, social, health, welfare, policing, education, spiritual, cultural, leisure and recreational needs (including Assets Of Community value) will be protected, unless it can be demonstrated that...’ In relation to a change to the contributions element of policy IF3, detailed discussions have not fully resolved this issue and any further consideration may be conducted through the Exeter Plan examination.
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			DCP cannot agree with ECC's position, and will explain why contributions towards police infrastructure are justified in our Hearing Statement.	
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- 2.5 As a result of discussions with Devon and Cornwall Police, the following updates to the City Council's Infrastructure Delivery Plan (which forms part of the evidence base for the Exeter Plan) are suggested by the City Council. Commentary reflecting discussions with Devon and Cornwall Police is provided below each entry in italics.

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
Improvements to strategic police infrastructure	Emergency services	D. Strategic	TBC	ECC, Devon and Cornwall Police	Devon and Cornwall Police, CIL	2032-2042
<i>The City Council considers it appropriate to identify CIL as a potential funding source given the strategic nature of this police infrastructure. This reflects the content of the Infrastructure List in the City Council's Annual Infrastructure Funding Statement (pages 15 and 16) ³. The City Council is of the view that there is insufficient evidence to justify s106 contributions for police infrastructure.</i> <i>It is understood that Devon and Cornwall Police would propose that s106 should be made available for this infrastructure. The justification for this will be provided in their Hearing Statement. DCP also propose that the Classification should be amended to "B. Important," although recognise that there is scope for "D. Strategic" to overlap with Strategic Projects which are also related to development. DCP also propose that the Estimated Delivery Period should be revised to 2027-2042.</i>						

³ Available at: https://exeter.gov.uk/media/42dmubnn/251201_annual-infrastructure-funding-statement_final.pdf

City Centre police base including office and public enquiry space (replacement of existing base following end of existing Civic Centre lease)	Emergency services	D. Strategic	TBC	ECC, Devon and Cornwall Police	Devon and Cornwall Police	2027 - 2032
<i>The City Council considers it appropriate to identify a city centre base within the Infrastructure Delivery Plan on the advice of Devon and Cornwall Police, however the City Council is of the view that this should be funded by Devon and Cornwall Police as opposed to development. This is because the lease on the current city centre base at the Civic Centre expires in 2028 and therefore there would be a need for the Police to secure an alternative base irrespective of the preparation of the Exeter Plan. The City Council is also of the view that there is insufficient evidence to justify s106 contributions for police infrastructure.</i> <i>It is understood that Devon and Cornwall Police would propose that s106 and CIL should be made available for this infrastructure and that the Classification should be amended to "B. Important.". Devon and Cornwall Police propose that the Estimated Delivery Period end date of 2032 should be extended to 2035. The justification for all of the proposed amendments will be provided within DCP's Hearing Statement,</i>						

3 Site allocations

Broad summary of chapter content

- 3.1 The Exeter Plan allocates a series of sites for development.
- 3.2 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located in or close to the city centre or key public transport hubs.

Addressing the response of Devon and Cornwall Police to the Regulation 19 Exeter Plan

- 3.3 Devon and Cornwall Police's representation dated 6 February 2025 raised the following matter in relation to the site allocations chapter at Regulation 19 Publication stage:
 - SBA2: East Gate and paragraph 16.16
- 3.4 The detail of the representation is available online on the examination website here: <https://exeter.gov.uk/media/u5knfda0/b-01-1-2.pdf>
- 3.5 In making the representation, Devon and Cornwall Police proposed modifications to the explanatory text in paragraph 16.16 and policy SBA2 itself. These are set out and discussed in the table below. The insertion of new text is shown in red and the deletion of existing text shown in red with strikethrough.

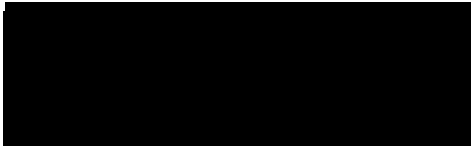
Element of the plan	Devon and Cornwall Police representation	ECC comment	Devon and Cornwall Police comment	Final position
Paragraph 16.16	Amend text as follows: 'East Gate is located on the edge of the city centre, stretching from Sidwell Street, to Cheeke Street, Paris Street and the end of Heavitree Road. It currently contains a variety of uses including the policing provisions, police office, public enquiry office, office, business and retail, residential, public car parking, the former bus station and former Pyramids Leisure Centre'.	The City Council would be content to amend paragraph 16.16 as follows: 'East Gate is located on the edge of the city centre, stretching from Sidwell Street, to Cheeke Street, Paris Street and the end of Heavitree Road. It currently contains a variety of uses including office, business and retail, policing provision, residential, public car parking, the former bus station and former Pyramids Leisure Centre'.	DCP supports the proposed amendment to paragraph 16.16 which recognises "policing provision." Agreed.	The City Council and Devon and Cornwall Police agree to suggest a modification to paragraph 16.16 as follows: 'East Gate is located on the edge of the city centre, stretching from Sidwell Street, to Cheeke Street, Paris Street and the end of Heavitree Road. It currently contains a variety of uses including office, business and retail, policing provision, residential, public car parking, the former bus station and former Pyramids Leisure Centre'.
SBA2: East Gate Policy text	Amend policy text as follows: 'C. Social, community, and cultural, safety and security infrastructure: i. Public realm that provides space for community and cultural activities;	The City Council would be content to amend policy text as follows: 'C. Social, community and cultural infrastructure including: i. Public realm that provides space for community and cultural activities;	Devon and Cornwall Police's final position relating to a potential amendment would be: iv. Accommodation appropriate for a city centre police base	Detailed discussions have not fully resolved this issue and any further consideration may be conducted through the Exeter Plan examination.

	ii. Retail or commercial units; iii. Policing space for the provision on-site or reprovision of policing facilities for the community at an suitable alternative site within the City centre; iv. Potential space for education/training provision/an innovation hub; v. Contributions to early years, primary, secondary and special educational needs and provision; vi. Contributions to policing infrastructure and policing provision; and vii. Contributions to GP provision'.	ii. Retail or commercial units; iii. Potential space for education/training provision/an innovation hub; iv. Accommodation appropriate for a city centre police base (including office and public enquiry space) as may be required for continuity of provision, and/or retail/commercial space; v. Contributions to early years, primary, secondary and special educational needs provision; and vi. Contributions to GP provision'. This would enable a city centre police base to be provided at East Gate as may be appropriate, however would not stipulate this as an absolute requirement. This is because Devon and Cornwall Police's area of search for a base (as set out in the proposed project brief) covers a much larger area including the majority of the city centre. The City Council is of the view that there is insufficient evidence to justify s106 contributions for police infrastructure.	(including office and public enquiry space) to provide for appropriate continuity of provision. DCP cannot agree to the proposed amendment to Policy SBA2C.vi suggested by ECC. Our Hearing Statement will explain where DCP's view differs, and why it is justified.	
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4 Governance, review and signoff

- 4.1 The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon, and where there are areas of disagreement, this statement documents the issue, and that both parties confirm their respective position.
- 4.2 It is agreed that these discussions will inform the Examination of the Exeter Plan.

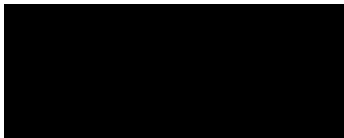
Signed:



Name: Roger Clotworthy

Position: Head of City Development, Exeter City Council

Signed:



Name: Iain Masters

Position: Development Manager, Devon and Cornwall Police