

Exeter Plan: Statement of Issues

Exeter City Council

September 2025

Exeter City Council
Civic Centre
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EX1 1JN



Contents

1. INTRODUCTION	3
2. PLAN PERIOD.....	4
3. SPATIAL STRATEGY	6
4. CLIMATE CHANGE	8
5. HOMES.....	11
6. ECONOMY AND JOBS.....	14
7. RETAIL AND THE FUTURE OF OUR CENTRES.....	17
8. SUSTAINABLE TRANSPORT AND COMMUNICATIONS	19
9. NATURAL ENVIRONMENT	21
10. HISTORY AND HERITAGE	24
11. CULTURE AND TOURISM	26
12. HIGH QUALITY PLACES AND DESIGN.....	27
13. HEALTH AND WELLBEING.....	28
14. INFRASTRUCTURE AND FACILITIES.....	30
15. SITE ALLOCATIONS	34
16. SUMMARY.....	39

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 consultation in February 2025 representations have been compiled and attention has turned to identifying the issues raised in the representations.
- 1.3. The Planning Inspectorate's procedure guide for local plan examinations¹ sets out the documents which should be submitted alongside the local plan and also provides guidance for additional work which should be undertaken in advance of plan submission.
- 1.4. Part of the procedure guide identifies that it is helpful for local planning authorities to produce a focused and comprehensive statement of the main issues raised in representations to the Regulation 19 consultation together with brief responses from the Council. This statement responds to this element of the guidance.
- 1.5. It should be noted that this document does not identify all the issues raised during the Regulation 19 consultation, nor does it list all the parts of the Plan which could benefit from suggested modification. More detail on suggested modifications to the Plan is included in the 'Schedule of Suggested Modifications' document.

¹ Available at: [Procedure Guide for Local Plan Examinations - GOV.UK](https://www.gov.uk/guidance/procedure-guide-for-local-plan-examinations)

2.0 Plan period: The need for a 15-year plan period from the likely point of adoption

Key issue

- 2.1 The National Planning Policy Framework (December 2023 version) ('the NPPF') clearly states the requirements for plan-making, including those plans containing strategic policies. This includes the Exeter Plan.
- 2.2 Paragraph 22 of the NPPF states that:
- ‘Strategic policies should look ahead over a minimum 15 year period from adoption’.
- 2.3 The Regulation 19 Publication version of the Exeter Plan has a plan period of 2021-2041.
- 2.4 The latest City Council Local Development Scheme (approved July 2025²) identifies that the Exeter Plan is to be published in September 2025 with examination potentially in March/April 2026 and adoption in March 2027 (subject to Examination timeframes which are uncertain).
- 2.5 If the timetable in the Local Development Scheme is adhered to, it will mean that a plan covering 2021-2041 will not have a lifespan of 15 full years after adoption. On this basis, a modification is suggested to move the plan-period forward by one year so it runs from 2022–2042. This will provide 15 years after adoption.

Key issue	Representor (s)	Council's response
1. The need for a 15-year plan period from the likely point of adoption	Various	In accordance with paragraph 22 of the NPPF, the need for a 15-year plan period after adoption of the Exeter Plan is recognised. A modification is therefore suggested to move the

² [Microsoft Word - 250714_DRAFT LDS 2025_Approved](#)

		plan-period forward by one year so it runs from 2022–2042. Associated modifications are suggested regarding various policies, the components of housing delivery, the housing trajectory and IDP to reflect this suggested modification.
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3.0 Strategic matters: Spatial strategy

Broad summary of chapter content

- 3.1 The spatial strategy chapter of the plan sets the tone for the plan as a whole and, in doing so, includes 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, retain Exeter's environmental and heritage quality, support healthy lifestyles including by minimising the need to travel, support the vitality of the city centre and provide opportunities for urban regeneration. The strategy does however provide for greenfield development opportunities where appropriate to allow a diversity of site to come forward.
- 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 and regeneration. 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.

Key issue

- 3.5 The responses to the Regulation 19 Plan have been reviewed and one key issue regarding the spatial strategy has been identified. This is described below, together with commentary and a high-level summary of the City Council's response. It should be noted that other issues raised later in the document may relate to the spatial strategy given its status as the driver for the rest of the plan's content.

Key issue	Representor(s)	City Council's response
2. Challenges to the spatial strategy including the need for more of a mix of brownfield and greenfield sites. Policy S1: Spatial strategy Overarching argument that the development strategy is over-reliant on brownfield development. Suggestion that a greater variety of types and scale of development site, including greenfield allocations, is required to ensure flexibility to viably deliver the quantity and types of development needed.	Various	The spatial strategy has a brownfield focus but does enable development of greenfield sites. There is already a range of site allocations in the Plan – brownfield, greenfield, strategic, large scale, small scale, mixed use, residential and employment. Additional greenfield development sites were included in the Regulation 19 Plan to address responses to previous Regulation 18 consultations. The deliverability schedule, housing trajectory, September 2025 five-year land supply statement, viability assessment and housing market insights report provide evidence of the robustness of the spatial strategy. No suggested modifications are required.

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.

Key issues

- 4.3 The responses to the Regulation 19 Plan have been reviewed and three key issues regarding the climate change chapter have been identified. These issues are described below, together with commentary and a high-level summary of the City Council's responses.

Key issue	Representor(s)	Council's response
3. Net zero ambiguity Policy CC1: Net Zero Representations suggest the policy requirements are imprecise and ambiguous and therefore the policy is not suitable for use in decision making.	Various	This policy is needed to ensure all development is contributing to the City Council's (and Government's) objective to reach net zero. Other policies in this chapter sit alongside CC1: Net Zero and focus on specific requirements for different types of proposal. Modifications are suggested to add definitions of specific terminology used in the policy, including net zero, to the glossary.
4. Inappropriate approach to local energy networks Policy CC3: Local energy networks Representations suggest the policy is not lawful, pre-judges what is the most appropriate solution for meeting energy needs sustainably and is not viable.	Various	This policy is a continuation of the approach taken in Exeter since 2012 (see policy CP13 Core Strategy) which has already resulted in the delivery of local energy networks in the city. The policy does not require connection (and is therefore lawful) but does seek to deliver development that can support local energy networks, an approach that is entirely in accordance with the Government's thinking on this (Heat Networks form an important part of the Government's plan to reduce carbon and cut heating bills for customers Heat networks - GOV.UK). Our approach is supported by the 'Exeter Heat Network Zoning Zone Opportunity Report' (DESNZ). The viability assessment has considered the policy requirements and specific wording requires regard to be had to 'feasibility or viability'. No suggested modifications are required.

5. Requirements for sustainable construction go beyond national standards Policy CC5: Future Development Standards Representations suggest the policy requirements go beyond Government targets and are therefore inappropriate.	Various	The Written Ministerial Statement made on 13 December 2023 refers to 'Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination...' in certain circumstances. The policy does not go beyond the Government's planned buildings regulations (refer to evidence document 'Future Development Standards report') and therefore the Ministerial Statement does not apply in this instance. No suggested modifications are required.
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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.

Key issues

- 5.3 The responses to the Regulation 19 plan have been reviewed and three key issues regarding the homes chapter have been identified. These issues are described below, together with commentary and a high-level summary of the City Council's responses.

Key issue	Representor (s)	City Council's response
6. Transitional arrangements for plan preparation and housing requirements. Policy H1: Housing requirement The transitional arrangements for preparing Local Plans set out in paragraph 234a of the NPPF will not apply if the Exeter Plan's housing requirement falls below 80% of local housing need during 2025.	Taylor Wimpey	The Exeter Plan reached Regulation 19 before 12 March 2025 and its draft housing requirement met at least 80% of local housing need. Therefore, the transitional arrangements for preparing Local Plans set out in paragraph 234a of the NPPF are met. No suggested modifications are required.
7. The need to plan for a larger number of homes. Policy H1: Housing requirement The Plan meets transitional arrangements in paragraph 234a of the NPPF, but it should nonetheless aim to deliver more than 642 homes per annum due to: - Deliverability risks associated with	Various.	The Exeter Plan reached Regulation 19 before 12 March 2025 and its draft housing requirement met at least 80% of local housing need. Therefore, the transitional arrangements for preparing Local Plans set out in paragraph 234a of the NPPF are met. The plan also includes supply headroom beyond the 642 homes per year. The deliverability evidence, housing trajectory, affordable housing evidence, five-year housing land supply statement, jobs and workers balance assessment and viability assessment provide

the development strategy's focus on brownfield land (see Key Issue in chapter 2). - The housing crisis. - The need for affordable homes in Exeter. - Past under-delivery against the Exeter Core Strategy's housing requirement. - The need to ensure a five-year housing land supply. - The need to support SME housebuilders. and - The need to support economic growth.		evidence for the robustness of the Exeter Plan's housing policies. No suggested modifications are required.
8. Demonstrating a five-year land supply. The City Council has not demonstrated, or cannot demonstrate, that there will be a five-year housing land supply at the intended point of intended adoption of the Exeter Plan. This is a requirement of the NPPF.	Various.	The September 2025 Exeter Five Year Housing Land Supply Statement demonstrates that there will be a five-year housing land supply at the intended point of adopting the Exeter Plan. This key issue is addressed in the Housing Topic Paper. A modification is suggested to reflect this point.

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.

Key issues

- 6.3 The responses to the Regulation 19 plan have been reviewed and three key issues regarding the economy and jobs chapter have been identified. These issues are described below, together with commentary and a high-level summary of the City Council's responses.

Key issue	Representor (s)	City Council's response
9. Insufficient employment land allocated: EJ6: New transformational employment allocations Representations suggest that the Exeter Plan has not identified enough employment land to meet the need generated by potential growth in the city's economy, and this will constrain future growth.	Various	The City of Exeter has significant growth potential but limited land within its administrative boundary to accommodate this. The growth of the City's economy can take place outside its boundary within the wider Functional Economic Market Area (FEMA) and the Economic Development Needs Assessment is clear about this. The current employment land need and supply position across the FEMA indicates that supply exceeds need and therefore economic growth potential will not be constrained. This key issue is addressed in the Economy and Jobs topic paper. Modifications are suggested to set out more clearly the potential for economic growth generated by the FEMA and to show how this can be met by the constituent authorities and to identify a jobs growth target for Exeter.
10. Overly restrictive focus on transformational sectors: Policy EJ6: New transformational employment allocations Representations suggest that the restriction of proposed employment	Various	Whilst the transformational sectors will undoubtedly be important to the future of the City's economy, it has been determined to take a less prescriptive approach to the nature of occupiers of allocated employment sites.

site allocations to the transformational sectors is not justified as the City of Exeter needs to accommodate growth across many sectors.		This key issue is addressed in the Economy and Jobs topic paper. Modifications are suggested to remove the requirement that allocated sites be delivered for transformational uses and also to highlight the alignment of Exeter's employment strategy with the UK's Modern Industrial Strategy.
11. Loss of employment at the strategic mixed use brownfield allocations. Policies SBA1 - 5 Representations suggest that the strategic mixed use brownfield allocations will result in a loss of employment land and that there is the potential for the loss of employment land within the Regeneration Opportunity Areas.	Various	The Exeter Plan is seeking to make the most efficient use of brownfield land and this accords with the approach advocated by national policy. Policies relating to the strategic mixed use brownfield allocations and the regeneration opportunity area aim to retain existing employment floorspace, introduce new forms of employment and deliver sustainable mixed use development at optimal density. This key issue is addressed in the Economy and Jobs topic paper. No suggested modifications are 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.

Key issues

- 7.3 The responses to the Regulation 19 plan have been reviewed and a key issue regarding the 'retail and future of our centres' chapter has been identified. This is described below, together with commentary and a high-level summary of the City Council's response.

Key issue	Representor (s)	City Council's response
12. Scale of retail provision at the East Gate and Exe Bridges Retail Park strategic mixed use brownfield allocations. Policy RFC2: Development in, and affecting our centres The Plan suggests that large scale and comparison retail is unlikely to be	NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd	The allocations at East Gate and Exe Bridges Retail Park as set out in policies SBA2 and SBA4 respectively envisage both comparison retail and residential development at the sites. The text within paragraph 8.19 and Policy RFC2 (Development in, and affecting our centres) conflicts with this objective. Modifications are suggested to treat East Gate and the Exe Bridges Retail Park as exceptions to the wider approach to the strategic brownfield mixed use

acceptable at the strategic mixed use brownfield allocations which conflicts with the aims for East Gate (Policy SBA2) (as suggested for amendment) and Exe Bridges Retail Park (Policy SBA4). The policy currently only supports small scale convenience retail at the strategic mixed use brownfield allocations.		allocations, allowing larger scale and comparison retail to come forward at these sites. This reflects the current presence of retail in these areas.
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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;
 - STC7: Safeguarding transport infrastructure;
 - STC8: Motorway service area; and
 - STC9: Digital communications.

Key issues

- 8.3 The responses to the Regulation 19 plan have been reviewed and a single key issue regarding the sustainable transport and communications chapter has been identified. This is described below, together with commentary and a high-level summary of the Council's response.

Key issue	Representor(s)	City Council's response
13. The need to refer and commit to the delivery of the Greater Exeter Transport Study and key transport policy documents such as the Local Transport Plan and Exeter Transport Strategy. Various policies in the sustainable transport and communications chapter.	National Highways	The City Council is a key partner in the preparation of the emerging Greater Exeter Transport Study and will continue to work with our neighbouring Councils, Devon County Council and National Highways to monitor and manage the cumulative transport impact of development through future Local Plan reviews. Modifications to various policies in the sustainable transport and communications chapter are suggested to identify the City Council's commitment to the Greater Exeter Transport Study and other transport policy documents and the delivery of their outcomes.

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.

Key issues

- 9.3 The responses to the Regulation 19 plan have been reviewed and two key issues regarding the natural environment chapter have been identified. These issues are described below, together with commentary and a high-level summary of the City Council's responses.

Key issue	Representor(s)	City Council's response
14. Inappropriate strength of protection for the landscape setting areas. NE1: Landscape Setting Areas. Representations suggest that the approach is not justified or sound. Specific issues raised: - The approach taken is not in conformity with the NPPF. - Policy is unduly restrictive and similar to the previous Local Plan policy LS1 which has been found to be unduly prescriptive. - No evidence of a 'valued landscape'. - Boundary is not correctly defined.	Various	The landscape setting areas are crucial to deliver Exeter's vision and spatial strategy. The City Council's approach has received strong support from Natural England. The policy is based on up-to-date evidence and accords with the current NPPF. Exeter's landscape setting forms its distinctive setting/backdrop and this sets it apart and elevates it from other countryside. This is what makes the landscape setting areas valued (see Exeter's Valued Landscapes Report, LDA). Boundaries have been reviewed and are considered to be in accordance with the up-to date evidence. This key issue is addressed in the Landscape Setting topic paper. No modifications are suggested to address this issue.
15. Inappropriately restrictive protection for the Valley Parks, including private land, and scope of boundaries. NE2: Valley Parks. Specific issues raised:	Waddeton Park	The Valley Parks have made a significant and enduring contribution to the City's green infrastructure. They make Exeter city an attractive place to live, work and invest. They are key to the spatial strategy and contribute to delivering the Local Nature Recovery Strategy, biodiversity net gain and Sustainable Alternative Natural Greenspace. The City Council has received strong support for the policy approach from Natural England and the Environment Agency.

- Lack of evidence/assessment and extensive areas in private ownership. - No review of boundaries of designations undertaken.		All boundaries have been reviewed and changes made where justified and all new valley parks are supported by evidence. No modifications suggested to address this issue.
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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.

Key issues

- 10.3 The responses to the Regulation 19 plan have been reviewed and one key issue regarding the history and heritage chapter has been compiled. This is described below, together with commentary and a high-level summary of the City Council's response to the issue raised.

Key issue	Representor(s)	City Council's response
16. Insufficient protection provided to heritage assets in the city, both designated and non-designated, by the various policies in the history and heritage chapter and in the context of strategic brownfield development. Various policies in the history and heritage chapter. Issues raised in relation to: - Historic buildings - Conservation Areas - City walls - Archaeology - Key views.	Historic England Exeter Civic Society Devon Archaeological Society	The City Council acknowledges and understands the significance of the historic environment to Exeter and its important role for its own sake but also in terms of how it can be embraced to deliver high quality development and attract investment, particularly at the strategic brownfield mixed use allocations. A series of modifications are suggested to clarify the importance of designated and non-designated assets, particularly in Policy HH1: Conserving and enhancing heritage assets. These include a consideration of the impact of development on heritage assets in the context of public benefit of development.

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.

Key issues

- 11.3 The responses to the Regulation 19 plan have been reviewed and no key issues regarding the culture and tourism chapter have been identified.

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 and liveable places:
- D1: Design principles;
 - D2: Designing-out crime; and
 - D3: Advertisements.

Key issues

- 12.3 The responses to the Regulation 19 plan have been reviewed and no key issues regarding the high quality places and design chapter have been identified.

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 being safe and becoming healthier:
- HW1: Health and wellbeing; and
 - HW2: Environmental quality, pollution and contaminated land.

Key issues

- 13.3 The responses to the Regulation 19 plan have been reviewed and one key issue regarding the health and wellbeing chapter has been identified. These are described below, together with commentary and a high-level summary of the City Council's response to the issue raised.

Key issue	Representor(s)	City Council's response
17. Planning contributions towards GP provision. Policy HW1: Health and wellbeing. Consideration of whether the policy provides sufficient clarity about when contributions towards GP provision will be required, which house types should contribute, whether the requirement is sufficiently justified and whether funding should be secured through Section 106 Agreements or CIL.	Chex Developments Churchill Living & McCarthy Stone.	The policy establishes the principle of seeking planning contributions towards GP provision where necessary, and frames this requirement flexibly to allow for an assessment to be carried out based on the specifics of the case. All housing types have the potential to have an impact on GP provision/capacity and any planning obligations would have to meet the 'tests of lawfulness' (necessary, directly related, fairly and reasonably related in scale and kind). It is not considered necessary to replicate the tests of lawfulness which are already set out in national policy. No modifications suggested to address this issue.

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.

Key issues

- 14.3 The responses to the Regulation 19 plan have been reviewed and a series of key issues regarding the infrastructure and facilities chapter has been compiled. These are described below, together with commentary and a high-level summary of the City Council's response to the issues raised.

Key issue	Representor(s)	City Council's response
18. Education infrastructure needs, particularly primary school provision.	Devon County Council; E Townsend.	The Exeter Plan acknowledges the potential for a second new primary school to be needed towards the end of the plan period as evidenced in the DCC education evidence base report. Given the housing types

Various parts of the chapter, together with the site allocations chapter in relation to Water Lane and development in Topsham - Consideration of whether the approach of designating a site for a new primary school at Water Lane (SBA1) but not specifying a site for a second new primary school is sufficient. - Consideration of whether the Exeter Plan's approach of seeking s106 contributions towards secondary school places but not designating a specific site for a new secondary school is sufficient.		expected to come forward (see 'Exeter Plan Housing and School Places Report, AtkinsRéalis) and the city's land constraints, the plan's approach of specifying one site for a new primary school is considered to be sound. There is potential for a new primary school to come forward through an allocation in East Devon adjacent to the city boundary north of Topsham and discussions have taken place with East Devon District Council on this basis. The need for secondary school places will be met through expansions to existing schools, as agreed with DCC. The City Council has worked closely with Devon County Council in relation to education infrastructure needs, as set out in the Statement of Common Ground. A series of modifications are suggested within the infrastructure and facilities and site allocations chapters and revisions have been made to the IDP to address these issues.
19. Detail of viability review mechanisms at planning application stage. Policy IF2: Viability - Consideration of whether the approach to viability appraisal at	Various	The policy requirements set out in the Exeter Plan have been viability tested and found to be deliverable (see the 'Local plan viability assessment' and 'Local plan viability assessment addendum', Three Dragons). The City Council does however acknowledge that circumstances may arise that justify viability being reconsidered at the planning application stage, and Policy IF2 supports this in accordance with the NPPF and PPG. Some modifications are suggested to clarify the approach to viability at planning application stage and to ensure closer alignment with the wording in the NPPF and PPG. The suggested modifications would

planning application stage is appropriate. - Consideration of the circumstances in which it is appropriate and justified to require viability review post-decision, and the mechanisms and triggers for how this is to occur.		allow a more flexible approach to when and how the City Council will require a viability review.
20. Detailed representations regarding the two policies covering community facilities, open space, play areas, allotments and sports facilities. Policy IF3: Community facilities Policy IF4: Open space, play areas, allotments and sport Consideration of whether the criteria against which redevelopment proposals are to be considered: - Are clear and effective for development management purposes. - Provide sufficient protection to needed facilities or whether they	Various	The City Council recognises the important role that community facilities, sports facilities and open spaces play in the everyday lives of communities. Policies IF3 and IF4 therefore provide protection for existing facilities and only allow their redevelopment subject to specified criteria. A number of modifications to Policies IF3 and IF4 are suggested to ensure that these criteria are clear and effective for development management purposes and that they provide a sufficient level of protection for needed facilities.

are overly restrictive to development.		
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15.0 Site allocations

Broad summary

- 15.1 The Exeter Plan allocates a series of sites for development. The site allocations (included in Policies H2: Housing allocations and windfalls, EJ6: New transformational employment allocations and policies SBA1-5) have been selected in accordance with the spatial strategy for the city set out in Policy S1.
- 15.2 The majority of 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 were part of the original Liveable Exeter work.
- 15.3 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2 of the Submission Exeter Plan. The City Council has suggested a main modification to amend this to thirty sites. These sites make up the balance of the city's 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 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.

Key issues

- 15.5 The responses to the Regulation 19 plan have been reviewed and a series of key issues regarding the site allocations has been compiled. These are described below, together with commentary and a high-level summary of the City Council's response to the issues raised.

Key issue	Representor (s)	City Council's response
21. SBA1: Water Lane: Issue 1: Primary school site area required. Devon County Council have identified a specific site area requirement of 1.6ha for the proposed primary school at Water Lane while the policy does not include a prescribed site area.	Devon County Council	The City Council recognises the importance of a primary school at Water Lane in terms of meeting education capacity requirements and also for place-making and community reasons. It is also important to note the urban character of the area and the limited land availability at the site. Detailed discussions have taken place between ECC and DCC to consider how the plan will enable an appropriate primary school to come forward. This is documented in a Statement of Common Ground. A modification is suggested to policy SBA1 to address this matter by referring to the need for the school to comply with Government guidance.
22. SBA1: Water Lane: Issue 2: Potential to deliver affordable housing at Water Lane. The recent proposal for major, strategic development at Water Lane South was agreed by Committee (minded to grant status) without a requirement to provide policy-compliant affordable housing. It has been argued that this demonstrates	Various	The City Council recognises the importance of delivering affordable housing at Water Lane and across Exeter. The Water Lane South proposal is just one part of the wider site – there are other opportunities to deliver affordable housing elsewhere. Viability review mechanisms would also allow provision of affordable housing as part of Water Lane South. The involvement of Homes England at Water Lane will also support the delivery of affordable housing. The City Council works proactively to deliver affordable housing across Exeter, not just through the planning system, but using other mechanisms.

the difficulty of delivering affordable housing here.		Recently permitted schemes supported by grants delivering 100% affordable housing are coming forward. No modifications are suggested to address this issue.
23. SBA2: East Gate Issue 1: The potential heritage impact of development: Conservation Area, Listed Buildings, archaeology and historic views	Historic England Devon Archaeological Society	The City Council acknowledges the relationship between development at East Gate and the historic environment. To address this, additional heritage evidence was produced to support the Regulation 19 Plan in the form of a Skyline Study. The role of this work has been clarified subsequent to Plan Publication. A modification is suggested to clarify the reference to the Skyline Study in Policy SBA2 which complements the existing protections to the historic environment.
24. SBA2: East Gate Issue 2: The suggested need for a replacement police-base to be provided in order to enable the development of part of the East Gate allocation and the need for associated contributions	Devon and Cornwall Police	The City Council recognises that there is an existing police base within the East Gate allocation at the Civic Centre. However, the police lease at the Civic Centre only runs until 2028 and therefore there will be a need for the Police Force to secure appropriate accommodation in future irrespective of the proposed

		allocation of this site. There are alternative office premises in the city centre which could be appropriate. In terms of developer contributions, there is currently an insufficiently robust evidence base to justify funding towards a replacement police base. No modifications are suggested to address this issue.
25. SBA3: Red Cow No key issues raised. Issues were matters of detail	N/A	N/A
26. SBA4: Exe Bridges Retail Park Issue 1: The likely delivery of development at the allocation towards the end of the plan period.	NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd	The City Council acknowledges that the site is unlikely to come forward for development until towards the end of the plan period. This has been taken into consideration in the housing trajectory. A potential modification is suggested to include additional text in Policy SBA4 to make this clear.
27. SBA4: Exe Bridges Retail Park Issue 2: The need to provide for the continued retail function at the site.	NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd	The City Council acknowledges the retail role of the site and the need to retain this use in accordance with the wishes of the site owner. A potential modification is suggested to include additional text in Policy SBA4 to clarify that continued retail is expected on the site.
28. SBA5: South Gate The potential heritage impact of development: Conservation Area, Listed Buildings, archaeology and historic views.	Historic England	The City Council acknowledges the relationship between development at South Gate and the historic environment. To address this, additional heritage evidence was produced to support the Regulation 19 Plan in the form of a Skyline Study. The role of this

		work has been clarified subsequent to Plan Publication. A modification is suggested to clarify the reference to the Skyline Study in Policy SBA5 which complements the existing protections to the historic environment.
29. EJ6: Employment: St Lukes Campus, Heavitree Road. Heritage considerations and the role of the 'Exeter Skyline Study'.	Historic England University of Exeter	The City Council acknowledges the relationship between development at St Luke's and the historic environment. To address this, additional heritage evidence was produced to support the Regulation 19 Plan in the form of a Skyline Study. The role of this work has been clarified subsequent to Plan Publication. The University of Exeter are also working up more detailed proposals as part of a masterplan/SPD for the site which is referenced in the Exeter Plan. This is supported by more detailed heritage assessment. It will be important that specific proposals are informed by heritage assessment and also the Skyline Study. Modifications are suggested to address this issue within the employment chapter relating covering St Luke's.

16.0 Summary

- 16.1 This report has summarised the key issues for each chapter of the Regulation 19 Publication version of the Exeter Plan following an in-depth review of the representations received. The list is not exhaustive.
- 16.2 Where appropriate, a description of potential suggested modifications is included to address some of the representations made. Further detail is included in an associated document; Schedule of suggested modifications.