Exeter
Civic Society

Established 1961
Registered Charity No: 286932

Robert L. Young
Programme Officer Exeter Plan Examination
Exeter City Council

By email
[redacted]

22 April 2026

Dear Mr Young,

Exeter Plan Inspection 2026. Policy IF2 Viability.

I am writing on behalf of Exeter Civic Society with additional information for the upcoming inspection of the Exeter Plan. I believe we have also asked to speak regarding the examination of Policy IF2.

Exeter Civic Society submitted a response to this policy at section 19 stage and asked that an additional paragraph is added: *d.) The inclusion of inflated acquisition costs upon acquiring land for viability assessments when likely site preparation and Exeter Plan Infrastructure needs have not been taken into account will not constitute an acceptable ground for a deviation from policy on the grounds of viability.'*

The council did not include our suggestion in their amendment of policy IF2 but we are pleased that they have rewritten the final paragraph to strengthen their desire to impose mechanisms to allow the viability of the proposal to be reviewed every 3 year. However, whilst the suggestion of a 3 year review may work for very large developments, for smaller developments they could be completed within that timescale. In addition, the start of the three year period is no stated. We suggest that the start date of the review period should be *'…from the date that the planning approval or viability approval is issued'*. And an additional trigger for smaller developments '….*to be reviewed upon completion of each reserved or full planning approval'.* We think the inclusion of these words will add more clarity about timescales for viability reviews.

We welcome the inspector's questions Q6, 7 & 8 under matter 14, issue 2 and hope that our suggested clause d. can be included in the policy or in the Viability Assessment, unless there is a robust statement in the Viability Procedures document stating that inflated acquisition costs will not be considered in assessing viability.

We recognise that the development of brownfield sites can come with additional costs but as these sites are already identified in the emerging Exeter Plan it is our assertion that these additional costs should be factored in at acquisition stage to ensure that affordable homes and the necessary infrastructure are delivered.

c/o 2 Ethelred Road
Exeter, EX1 3FB
www.exetercivicsociety.org.uk

Some of the identified brownfield sites are already owned by the landowner so it would be unreasonable for the likes of Network Rail to cite any commercial land value as an impediment to development sites such as the Red Cow site.

There are two recent examples of planning applications where the city council has agreed to defer affordable housing contributions because the applicant has cited viability issues. We recognise that these were considered under the current Local Plan, but the wording of those policies in respect of affordable housing and viability are similar to the emerging plan. If the LPA is not robust enough in defending policies, perhaps because of a lack of housing supply, the level of affordable housing will fall further.

The two developments are:

1. *The Harlequin Centre Paul Street Exeter EX4 3TT.* ***24/0911/MDO.*** *Modify s106 legal agreement tied to planning permission ref. 21/1104/FUL to pay a financial contribution in lieu of the provision of affordable private rent units to improve scheme viability.*

We note that although this application was validated in September 2024 and subsequently approved by the city council planners it is yet to be signed off by a planning approval letter.

2. *Water Lane (South), Exeter, EX2 8BZ.* ***23/1007/OUT.*** *Demolition of existing buildings and structures and residential-led mixed use development providing new dwellings, residential and work space, retail, café/restaurant, community and cultural/leisure/education/hotel uses and associated infrastructure, including vehicular access, servicing, mobility hub, energy plant; alteration of ground levels; drainage and public open space; landscaping and public realm works; including pedestrian and cycle routes, with all matters reserved for future considerations, with the exception of access (Revised Plans*).

This application was validated in August 2023 and subject to many updates before the decision by the city council's planning committee to approve the scheme on 27 January 2025, although it is yet to be signed off by a planning approval letter. Prior to the planning committee considering the application the applicant requested that the development be exempt from any affordable housing contributions. This was recommended by the planning officer and agreed by the planning committee. As this is a significant development for nearly 1000 homes the decision will make a significant dent in the expected number of social homes during the plan period.

We look forward to speaking further about this issue at the Inspection.

Yours sincerely

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