

Exeter Plan

Hearing statement

Matter 9:
Site Allocations: Issue 1

February 2026

Exeter City Council
Civic Centre
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1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to first part of Matter 9.
- 1.2. The statement covers Matter 9, Issue 1 as follows:
 - Issue 1 - Housing Allocations and Windfalls – Policy H2
- 1.3. A further statement will be produced covering Issue 2 and the strategic mixed use brownfield allocations for the second set of hearings in May 2026.

2. Issue 1: Housing Allocations and Windfalls – Policy H2

Q1. Do the proposed residential site allocations incorporate all types of housing? What is the latest position regarding planning approvals and construction timeframes for these sites?

- 2.1. The proposed housing allocations in policy H2 include all types of housing.
- 2.2. Appendix A of this Statement provides the latest position regarding planning approvals and construction timeframes for the sites identified in policy H2. The information in appendix A updates that contained in the Exeter Plan Delivery Schedule (EVB-H-06). Please note that Belle Isle Depot, Land at Hamlin Lane and 88 Honiton Road are not shown in appendix A. The Council has suggested main modifications to delete these sites from policy H2 (CSD-03: pages 10 and 12, SMM20, SMM26 and SMM27), as explained in the Council's response to Matter 4, Issue 1, Question 5. The modifications will ensure that the Plan only allocates sites that are suitable, available and achievable for housing.

Q2. How were different sites considered for inclusion as residential allocations? What process did the Council follow in deciding which sites to allocate?

- 2.3. Please see the Council's response to Matter 4, Issue 1, Question 1, which explains that the Exeter Housing and Economic Land Availability Assessment (HELAA) (EVB-H-02a-d) and the Sustainability Appraisal Report (SA) (EXM-02a) were the key pieces of evidence used to consider sites for inclusion as allocations. The response also explains the process used by the Council to decide which sites to allocate for housing.

Q3. How did the Council consider the infrastructure requirements of the growth proposed in the Plan and how did this inform the site selection process?

- 2.4. Please see the Council's response to Matter 4, Issue 1, Question 3, which explains how the Council considered the infrastructure requirements of proposed growth and how this informed the site selection process.

Q4. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were issues such as flood risk considered?

- 2.5. Please see the Council's response to Matter 4, Issue 1, Question 4, which demonstrates that the site selection process was robust, being based on the Housing and Economic Land Availability Assessment (HELAA) (EVB-H-02a-d), the Sustainability Appraisal (SA) (EXM-02a); that an appropriate selection of potential sites were assessed; and that appropriate criteria were taken into account including flood risk.
- 2.6. Flood risk was specifically considered through the HELAA and SA as follows:

- Consultation with the Environment Agency and Devon County Council as lead flood risk authority on all sites; and
 - Preparation of Level 1 and 2 Strategic Flood Risk Assessments (EVB-CC-13a-h), the conclusions of which are reflected in the HELAA and SA.
- 2.7 All sites proposed for allocation in policy H2 are either free from flood risk, or meet the sequential test (see EVB-CC-13a: page 12, paragraphs 10.3 to 10.6), or have the ability to meet the exception test (EVB-CC-13b, page 13, paragraph 3.2.3).
- Q5. How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield sites like Water Lane? What differentiates Water Lane from Marsh Barton which was removed as a housing allocation to instead be a Regeneration Opportunity Area?**
- 2.8 Please see the Council's response to Matter 4, Issue 1, Question 2, which explains how viability and deliverability were considered, especially where new strategic infrastructure is required or where viability has proven challenging.
- 2.9 For Water Lane, deliverability considerations indicate that development will continue beyond the end of the Plan period (EVB-H-06: please see the entries in the Build rate column for site refs. 15/116, 5/117 and 5/130 on page 1, 3 and 5). However, all land that is expected to deliver development has been confirmed as available for redevelopment. This is shown in the Exeter Plan Delivery Schedule (EVB-H-06, pages 1 to 7) and the Site Availability Evidence (EXM-020: pages 4 and 14-24). In comparison, only five small individual land parcels at Marsh Barton have been confirmed as available for redevelopment through the HELAA process (EVB-H-02a: site refs. 120 to 124 on pages 473 to 502). Marsh Barton is not identified as a strategic mixed-use brownfield allocation because of the current lack of availability evidence.
- Q6. How did the Exeter Skyline Study and Exeter Density Study inform the site selection process, especially for sites within the city centre? Did the removal of large housing allocations such as Marsh Barton have any implications in terms of density assumptions for the remaining residential allocations? If so, what is the justification for this approach?**
- 2.10 The Exeter Skyline Study (EVB-HH-02) did not directly inform the site selection process: its key purpose is as a development management resource to inform emerging development proposals (see EVB-HH-02: page 6).
- 2.11 However, in the Exeter Plan Strategic Allocations: View, Heights and Capacity - Applied Methodology (EVB-HH-03), the key views identified in the Exeter Skyline Study are used to test the potential housing capacities of East Gate, Red Cow, West Gate and South Gate. The housing capacities in policy H2 for East Gate, Red Cow, West Gate (in the form of Exe Bridges Retail Park) and South Gate are no higher than those identified in EVB-HH-03).
- 2.12 The Exeter Density Study (EVB-H-08) was not used to inform the site selection process. The purpose of the study was to provide high-level recommendations

for minimum residential densities within the city centre and other areas that are suitable for a general uplift in density. Via the HELAA, it has been used to inform the approximate site capacities in policy H2.

- 2.13 The removal of large housing allocations such as Marsh Barton had no impact on the density assumptions for other housing allocations. Specifically, the removal of these sites did not result in the Council increasing the density assumptions for other allocations.

Q7. Is the Exeter Plan's windfall allowance justified and supported by compelling evidence? How would housing development on unallocated sites outside of the urban area be dealt with? Is the policy sufficiently clear in this regard to be effective?

- 2.14 Please see the Council's response to Matter 5, Issue 1, Question 5, which provides the Council's response to the first part of this question.

- 2.15 The Plan should be read as a whole. Policy H2 is clear that the Council supports the principle of windfall development within the urban area. The area outside the urban boundary provides Exeter's valued landscape setting, which policy NE1 seeks to protect. Housing proposals within the landscape setting area will be assessed against policy NE1 and other relevant policies in the Plan.

Q8. What is the justification for the suggested modifications to the supporting text to Policy H2? Why are they necessary for soundness?

- 2.16 The Council has suggested three modifications to the supporting text to policy H2 (CSD-03: pages 52 to 53, SAMM17 to SAMM19). Whilst it is not considered that these changes are required for soundness, they do address representations made by other parties and provide greater clarity.

3. Summary

- 3.1. This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to the first part of matter 9 of the Exeter Plan Examination.
- 3.2. All questions associated with issue 1 have been answered. A further statement will be produced covering issues 2 and 3.

APPENDIX A: Latest position regarding planning approvals and construction timeframes for policy H2 sites

Site	Latest position
Strategic mixed use brownfield sites	
Water Lane - Water Lane South - Haven Banks Retail Park - Isca House - Vulcan Estate 61 and 62 Haven Road - Canal Office and Sea Cadets	- The Council and applicants are continuing to progress Section 106 Agreements to allow planning permissions 22/1145/FUL (for Haven Banks Retail Park) and 23/1007/OUT (for Water Lane South) to be issued. - Pre- pre-application discussions have taken place between the Council and a potential new landowner/developer, for mixed-use development at Isca House. - The planning status of Vulcan Estate, 61 and 62 Haven Road and Canal Office and Sea Cadets remain as per the Exeter Plan Delivery Schedule (EVB-H-06: pages 4 to 6). - The latest position regarding planning approvals indicates that the construction timeframes in the Exeter Plan Delivery Schedule are still realistic.
East Gate - City Point, Paris Street - Civic Centre, Paris Street - Manor Court - Pyramids, John Hannam House and Eaton House - Clarendon House	- The planning status of City Point, the Civic Centre, Manor Court and the Pyramids (etc.) remain as per the Exeter Plan Delivery Schedule (pages 7 to 10). - Regarding Clarendon House, Planning Committee granted approval for application ref. 25/1082/FUL in February 2026, subject to the completion of a Section 106 Agreement. Work on the Agreement is progressing. - Regarding the Civic Centre (which is owned and occupied by the Council), a report to Full Council in February 2026 demonstrates work by the Council to release the site for redevelopment (SMB.12.04 Report - Use of City Council Assets to drive Regeneration - clean 1.pdf). - Regarding City Point (which is owned by the Council), a report is to be taken to the Council's Executive in March to consider potential delivery strategies for the site. - The latest position regarding planning approvals indicates that the construction timeframes in the Exeter Plan Delivery Schedule are still realistic.
Red Cow Red Cow North	The planning status of Red Cow sites remains as per the Exeter Plan Delivery Schedule (pages 11 to 12).

University of Exeter land, Brunel Court	The latest position regarding planning approvals indicates that the construction timeframes in the Exeter Plan Delivery Schedule are still realistic.
Exe Bridges Retail Park	- The planning status remains as per the Exeter Plan Delivery Schedule (page 12). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
South Gate	- The planning status remains as per the Exeter Plan Delivery Schedule (page 13). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Predominantly residential sites: large scale	
Land at Old Rydon Lane	- Outline planning application 14/1451/OUT for up to 392 homes was disposed of by the Council in October 2025, because the Council had been unable to make progress with the applicant on the Section 106 Agreement. - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 15) is still realistic.
St Bridget Nurseries	- The outcome of the Judicial Review of planning permission 23/1320/OUT is expected imminently. - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 15) is still realistic.
Heavitree Road Police Station	- Planning Committee granted approval for application ref. 25/0676/FUL in December 2025, subject to the completion of a Section 106 Agreement. Work on the Agreement is progressing. - The latest position indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic (page 16).
Mary Arches Multi-Storey and Surface Car Park	- Proposals in planning application 25/0781/FUL have been revised by the applicant and now comprise 297 co-living studio flats. - At a meeting on 19 January 2026, Planning Committee agreed on the principles of the application, but deferred determination to provide more time to address some detailed matters of scale, massing and design quality. - The number of homes proposed by the planning application (297) exceeds the site capacity in policy H2 (246).

	The latest position indicates that the site capacity in policy H2 and the construction timeframe in the Exeter Plan Delivery Schedule are still realistic (page 16).
Whipton Community Hospital	- The planning status remains as per the Exeter Plan Delivery Schedule (page 16). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Predominantly residential sites: major	
Rougemont Switching Centre	- The planning status remains as per the Exeter Plan Delivery Schedule (page 18). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land at Newcourt Road, Topsham	- The planning status remains as per the Exeter Plan Delivery Schedule (page 18). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land adjoining Silverlands	- Pre-application discussions (ref. 24/1473/MP) between the Council and Edenstone Homes have progressed. Edenstone now proposes to enlarge the site to include an adjoining property and to develop 67 homes (net) in total. - Planning officers are broadly content with Edenstone's proposed pre-application layout. - Edenstone has informally advised the Council that it expects to submit a planning application in April 2026. - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 18) is still realistic.
Land to the west of Newcourt Road	- The planning status remains as per the Exeter Plan Delivery Schedule (page 19). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land at Topsham Golf Academy	- Planning Committee granted approval for application ref. 24/0785/FUL in December 2025, subject to the completion of a Section 106 Agreement. Work on the Agreement is progressing. - The latest position indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic (page 19).
Land at Exeter Squash Club, Prince of Wales Road	The planning status remains as per the Exeter Plan Delivery Schedule (page 19).

	The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land and buildings at Victoria Street	- A pre-application inquiry to redevelop the site for build-to-rent housing is pending consideration (24/1544/MP). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 19) is still realistic.
12-31 Sidwell Street	- The planning status remains as per the Exeter Plan Delivery Schedule (page 20). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land to the east of Newcourt Road 2, Topsham	- In October 2025, Members agreed that planning application 24/1425/FUL could be approved under delegated powers subject to the completion of a S106 Agreement. Engrossments have been prepared and are circulating. - This latest position indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 20) is still realistic.
Clifford Close	- The planning status remains as per the Exeter Plan Delivery Schedule (page 20). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Gipsy Hill Hotel	- The planning status remains as per the Exeter Plan Delivery Schedule (page 21). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Unit 1 Nightclub, Summerland Street	- A planning application to redevelop the site to provide 180 studio flats of purpose build student accommodation was submitted in December 2025 and is pending consideration (25/1817/FUL). - The application was submitted following pre-application consultation with the Council and community consultation by the applicant. - The application site includes an adjoining garage site. - The freehold of Unit 1 and the adjoining garage site are owned by the Council. The Council is actively working to dispose of both sites. - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic, and may be conservative (page 18).

Land behind 66 Chudleigh Road	- The planning status remains as per the Exeter Plan Delivery Schedule (page 21). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Chestnut Avenue	- The planning status remains as per the Exeter Plan Delivery Schedule (page 22). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
East of Pinn Lane	- The planning status remains as per the Exeter Plan Delivery Schedule (page 22). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land at Matford Lane 2	- The buildings that previously occupied the site were demolished under planning application DCC/4435/2023, made and determined by Devon County Council, - In January 2026, Devon County Council approved planning application DCC/4439/2025 which proposed an extension to the implementation period of the landscaping scheme required by DCC/4435/2023, from two to three years. - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 22) is still realistic.
Hessary, Hollow Lane	- The planning status remains as per the Exeter Plan Delivery Schedule (page 22). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Fever and Boutique, 12 Mary Arches Street	- The planning status remains as per the Exeter Plan Delivery Schedule (page 23). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land south of Gipsy Hill Lane	- The planning status remains as per the Exeter Plan Delivery Schedule (page 23). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Garages at Lower Wear Road	- The planning status remains as per the Exeter Plan Delivery Schedule (page 23). - The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Residential sites: minor	
Newbery Car Breakers	A planning application to redevelop the site to provide 7 homes was submitted in November 2025 and is pending consideration (25/1684/FUL).

	• The planning application includes a legal opinion that a planning application for 3 homes made in 2003 was implemented by digging of a trench (03/0906/FUL). The Council does not agree with this legal opinion, because no pre-commencement conditions have been discharged. • Whether or not the 2003 application was implemented, the new planning application indicates that the site's approximate capacity in policy H2 is realistic. • The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule (page 25) is realistic, and may be conservative.
Lancelot Road	• The planning status remains as per the Exeter Plan Delivery Schedule (page 25). • The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land rear of Beacon Lane Shops	• The planning status remains as per the Exeter Plan Delivery Schedule (page 25). • The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
Land at Taunton Close	• The planning status remains as per the Exeter Plan Delivery Schedule (page 25). • The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.
91-97 Wonford Street	• The planning status remains as per the Exeter Plan Delivery Schedule (page 26). • The latest position regarding planning approvals indicates that the construction timeframe in the Exeter Plan Delivery Schedule is still realistic.