

EXAMINATION OF THE EXETER LOCAL PLAN

HEARING STATEMENT

MATTER 4

SITE ALLOCATIONS PROCESS AND METHODOLOGY

PREPARED FOR
WADDETON PARK LIMITED

February 2026



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Introduction

This Hearing Statement is submitted by PCL Planning Ltd on behalf of Waddeton Park Limited and relates to **Matter 4** (Site Allocations Process and Methodology) as identified in the Inspectors' Matters, Issues and Questions (MIQs).

Waddeton Park Limited is a highly experienced land promoter, operating for over 2 decades, who has secured permission for over 3,000 new homes on sites across the South West. Working closely with landowners, local authorities, stakeholders, and local people, Waddeton Park Limited secure planning permissions for high quality, sustainable developments which benefit the wider community.

Responses to the specific Issues and Questions in relation to Matter 4 as presented in the Inspectors' MIQs are set out below under the relevant headings.

Issue 1 – Site Allocation Methodology

Question 1 - How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

As outlined in our Matter 3 Paper (Spatial Strategy and Distribution of Development), we are concerned that the Council's wish to pursue a strategy primarily focussed on strategic brownfield sites from the outset has prejudiced the consideration of other suitable and available locations. This has been further unduly influenced by the incorrect assumption that there is no longer any capacity for greenfield sites at the edges of the city. However, the evidence base does not robustly consider such opportunities or importantly provide any granular assessment of landscape setting in relation to releasing sites.

Additional greenfield opportunities exist as is evident from sites previously promoted during the Local Plan process; and these sites have been demonstrated to be genuinely available and deliverable. Our client has promoted sites at Home Farm at Church Hill and Land at Barley Lane through our previous representations

which could provide an important contribution towards meeting's the city's challenge to deliver housing in the short-term. Inclusion of such sites would also increase the resilience of the Plan's strategy and provide a wider mix and choice of housing.

Despite the lessons that should have been learnt from previous appeal decisions that confirm that sites and proposals need to be individually assessed on their own merits, taking into account their different values and functions and therefore the contribution that they make to landscape setting, the Council continue to take an unreasonable and unlawful blanket approach to such sites.

The site assessment process within the HELAA fails to recognise that sites within the landscape setting areas (LSA) vary significantly in terms of visibility, public accessibility and setting. This does mean (as has been shown through appeal decisions) that undeveloped sites within the landscape setting areas can still have a negligible contribution to the broader backdrop of the city in terms of views, particularly where already influenced by housing associated with the suburban fringe.

Instead, the HELAA assessment rules out potential sites at Stage A where they are within the LSAs within the 2022 Landscape Sensitivity Assessment because they are "within landscape that has a high sensitivity to new housing development" with no further assessment. Contrary to the conclusions of a number of Inspectors this clearly fails to recognise that the broad assessment within the LSA ignores the distinct differences between individual land parcels.

Such an approach to site selection is neither robust, nor reasonable. Furthermore, it cannot be effective as such a process will have ignored suitable and available locations which could have an important role in the delivery of housing. Such sites could support the Council's Plan strategy addressing the urgent need and chronic existing undersupply in Exeter and providing much needed resilience in the face of the complexities and uncertainty of delivery on the strategic brownfield sites.

To put this in context almost 1000 homes were released on appeal during the previous plan period. This is a clear indication of both the failure to maintain land

supply and to consider robustly opportunities at the city's edge. This blanket approach to constraint, without seeking to make difficult decisions to meet the severe housing challenges the Council faces has continued through the site allocation methodology for this Plan.

Without robustly considering alternative site options the Council increases the risk for Plan failure, removing opportunity for contingency and resilience when delivery assumptions related to complex and uncertain brownfield sites are not realised.

We have, in our Matter 3 (Spatial Strategy and Distribution of Development) Paper, identified the need for providing more flexibility through the introduction of additional greenfield sites and/or a policy release mechanism that provides contingency to the Plan by supporting greenfield release in landscape setting areas where the Plan is not delivering as anticipated.

Question 2 - 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 land?

We do not consider that the Council has robustly assessed uncertainties around viability and deliverability of sites and have raised consistently concerns regarding the over reliance on large brownfield sites and the failure to realise the complexities and lead-in times for delivering them. The Council relies heavily on design and placemaking principles in supporting the strategic brownfield sites. Whilst this is laudable it provides no certainty that the Plan's focus on strategic brownfield sites will lead to a strategy that is effective.

The HELAA assessment of these sites provide an overview of the sites' constraints and issues but offers little in terms of how these challenges can be overcome in terms of demonstrating the deliverability of the sites. Instead, reliance is placed on the HELAA Panel's conclusion that "*development is achievable subject to a strategic approach being taken to address site constraints through masterplanning and phasing.*" The HELAA further points to the scale of such sites as offering "*potential opportunities to overcome these constraints.*" The basis for these

conclusions in the absence of detailed assessment of delivery factors and strategy for overcoming these constraints remains unclear.

The Local Plan Viability Assessment Addendum (LPVAA) does little to address those concerns, accepting that there are a range of viability issues which are recognised as being “challenging”. It addresses this by relying on parcels within sites where there may be some measure of progress (albeit limited) as a template for the viability of the strategic sites overall. This approach is flawed in not recognising that those parcels are likely to be more straightforward in terms of landownership, contamination, existing use and flood risk. Reducing opportunities for a comprehensive delivery strategy and cost equalisation, risks making the more complex elements even less deliverable. Instead, viability challenges for longer term delivery of these sites are seemingly dismissed within the assessment by a reliance on assumed improved market conditions over time (alongside the availability of public funding). This falls significantly short of the strategic approach recommended by the HELAA Panel.

We are concerned that the Plan’s strategy is not underpinned by any evidence that demonstrates that a robust approach has been taken to assess the obstacles to delivery that clearly exist for the focus on a brownfield strategy (such as evaluating the existing landownership and leasehold interests that exist and the embedded values therein), costs of redevelopment and remediation, costs of superstructure construction, programmes for business closures or the decanting of existing uses (and if the latter is to be pursued where, and at what cost, are relocation sites available?). These are all matters that have been raised previously through representations on the Emerging Plan but remain unaddressed in terms of forming a coherent strategy to underpin the Plan’s brownfield focus.

This is critical because the over reliance on the 5 strategic brownfield sites increases the risk of a plan failure, with any delays in delivery on one of these sites (or material delays across multiple sites) having fatal consequences for meeting the housing requirement across the plan period. Without a full understanding of the deliverability of these sites and how their many challenges can be overcome to demonstrate delivery within the Plan period, there can be no

confidence that the Plan's strategy is effective, particularly given the lack of any contingency.

Simply relying on the sites being identified in the later part of the plan period and the opportunity for an improved economic context does not constitute a robust assessment of deliverability.

Recent evidence from Bristol¹ has identified that city centre development is facing significant viability challenges with costs increasing exceeding values. Such challenges are now seen as long-term and structural, rather than a temporary downturn in economic circumstances. Key drivers of the issues facing developers include sustained construction cost inflation, labour and supply chain constraints, fragmented sites and tighter regulation including the implications of the Building Safety Act on taller buildings. The outcome has been stalled schemes, a growing gap between policy expectations and what can be viably built and significant uncertainties for affordable housing delivery and housing mix.

Whilst it is accepted that Exeter is not Bristol, it is not unlikely that the City will face similar issues particularly in respect of the viability of high-density housing at the centre given the complexities of the sites. Yet the evidence base of the Plan fails to explore these trends and the implications on the strategic sites in a robust assessment of deliverability factors. Without this, as stated above, there can be no confidence that the reliance on such sites will not risk Plan failure if development does not come forward as anticipated.

Question 3 - How did the Council consider the infrastructure requirements of the growth proposed in the Plan (such as grid capacity and the strategic road network) and how did this inform the site selection process?

Not relevant to our representations

¹ Report to Bristol City Council Economy and Skills Committee (16th February 2026) - Viability Working Group Closure Report <https://democracy.bristol.gov.uk/documents/s122683/Committee%20Report.pdf>

Question 4 - Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

Please see our response to Question 1 above. We do not consider the site selection process was robust and was driven by the Council's wish to pursue a strategy primarily focussed on strategic brownfield sites from the outset which has prejudiced the consideration of other suitable and available locations. Furthermore, the consideration of other opportunities has been influenced by an assumption that there is no longer any capacity for greenfield sites at the edges of the city, based on a blanket approach toward landscape setting policies.

Therefore, the evidence base does not robustly consider such opportunities or importantly provide any granular assessment of landscape setting in relation to releasing sites. This is despite the lessons of previous appeal decisions highlighting the need to consider sites within the LSA on their own merits and recognising that there will be significant variation in respect of landscape visibility, setting and accessibility. As a result there are undeveloped sites within the landscape setting areas that can still have a negligible contribution to the broader backdrop of the city in terms of views, particularly where already influenced by housing associated with the suburban fringe.

Unfortunately, the HELAA assessment has not taken that approach, instead ruling out sites within the LSA at Stage A and ignoring the distinct differences between individual land parcels. Additional greenfield opportunities exist as is evident from sites previously promoted during the Local Plan process; and these sites have been demonstrated to be genuinely available and deliverable. Our client has promoted sites at Home Farm at Church Hill and Land at Barley Lane through our previous representations which could provide an important contribution towards meeting's the city's challenge to deliver housing in the short-term. Inclusion of such sites would also increase the resilience of the Plan's strategy and provide a wider mix and choice of housing.

Such sites have proven a significant source of housing delivery in the current Plan period, with almost 1000 homes were released on appeal. This is a clear indication

of both the Council's failure to maintain land supply and consider robustly opportunities at the city's edge.

We have, in our Matter 3 (Spatial Strategy and Distribution of Development) Paper, identified the need for providing more flexibility through the introduction of additional greenfield sites and/or a policy release mechanism that provides contingency to the Plan by supporting greenfield release in landscape setting areas where the Plan is not delivering as anticipated.

Question 5 - In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

There are no suggested modifications put forward that would address our concerns regarding the site allocation process. As we have set out above and in previous representations there are clear risks that the Plan raises in respect of not being positively prepared, justified, effective and being inconsistent with national policy. This could be addressed through a more deliverable approach to plan-making and a more balanced strategy that recognises the need for choice and resilience within the housing market, driven by the need to meet identified needs. It is simply not the case that Exeter does not still have some capacity for genuinely suitable greenfield sites that can significantly contribute to the Plan's objectives and provide much needed contingency to the over reliance on complex strategic brownfield sites with clear delivery uncertainties.

In our view, a revised approach to site allocations, including providing more flexibility through the introduction of additional greenfield sites and/or a policy release mechanism is essential in demonstrating that the Plan will be sound.