

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 4 (Site Allocations Process and Methodology)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



Issue 1 – Site Allocation Methodology

Q1 How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

1. The options for sites to be considered for inclusion as specific allocations includes sites submitted as part of call for sites exercises, as well as sites previously allocated in the Exeter Core Strategy, and the Exeter Local Plan First Review. As per the Sustainability Appraisal, these site options have been assessed against the sustainability criteria, including an assessment of the previously included West Gate site. Site options were then proposed or removed based on a decision based on potential impacts from Exeter City Council, as set out in Appendix E of the Sustainability Appraisal.

Q4 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

2. In so far as it relates to the previously included West Gate it is not considered that the final decisions to allocate or not allocate certain sites were robust. Despite a high score in a number of the sustainability criteria, West Gate was not taken forward as an allocation, nor Exbridge House specifically. Appendix E of the Sustainability Criteria states that the previously included West Gate was removed for the following reasons:

“Parts of site are unsuitable due to landscape impact, unacceptable flood risk, unacceptable impact on a conservation area, topography and because it contains infrastructure that is to remain in situ. However, area around Exe Bridges Retail Park is suitable”

3. We would strongly encourage the Council to reconsider this assessment. The new Framework states in paragraph 36a that for a plan to be considered sound it must be ‘positively prepared’, and, as a **minimum**, seek to meet the area’s objectively assessed needs. It is acknowledged that the proposed housing requirement of 13,975 homes for the plan period (642 homes per year) is within 80% of the new local housing need set out within the standard method published alongside the NPPF in December 2024. The

proposed requirement is therefore in accordance with the transitional arrangements set out in paragraph 234 of the NPPF. We urge the Council to go beyond the minimum and plan positively by exploring opportunities to meet the standard method figure of 800 homes per year. Given the importance to plan positively for an increase in housing delivery following the publication of the new Framework and “significantly” boost the supply of homes per paragraph 61, the full West Gate allocation is a clear candidate for inclusion within the Local Plan. As per our previous representations, the West Gate area is capable of accommodating over the 200 dwellings proposed in the previous draft allocation, which is supported by the Liveable Exeter Vision earmarking the new neighbourhood for 617 homes.

4. While a number of potential impacts have been identified by the Council, these are all capable of being resolved through the planning application process and should not constitute a reason for omitting the full West Gate area as an allocation. In terms of the reference to ‘unacceptable flood risk’ for example, it is not clear at why this has been used as a reason to remove West Gate from the Plan as in the same breath there is reference to Exe Bridges Retail Park being retained despite there being the same level of flood risk compared to the rest of the West Gate area.
5. With reference to Exbridge House in particular, which falls within a Conservation Area, is not considered to have meaningful architectural merit, and indeed there is an opportunity to deliver a scheme which significantly raises the architectural quality. Also, while the site does fall within Flood Zone 3, this is not considered to be an overriding constraint as a flood risk strategy can be developed to ensure safe access and egress.
6. Therefore, we strongly recommended that the entire West Gate allocation is reinstated, or at an absolute minimum the Exbridge House site should be included as a stand-alone allocation, in order to align with the objectives of the Framework to “significantly boost the supply of homes”. Further details for Exbridge House, including the site location plan showing the extent of the site controlled by TT Group is contained in the Regulation 19 representations submitted in early 2025.

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Q5 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

7. While there is nothing in the Schedule of Suggested Modifications which we consider necessary for soundness, as noted above we strongly recommend the reinstatement of the West Gate allocation or a standalone Exbridge House allocation to demonstrate beyond doubt that the plan has been prepared positively and is therefore sound.