



[REDACTED]
Exeter City Council

By email
[REDACTED]

27 January 2027

Dear Mr Young,

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 H4.

Policy H4 Affordable Housing.

Exeter Civic Society submitted a response to this policy at section 19 stage. We are disappointed that the council did not make the changes we suggested but we are pleased to see that the Inspector has introduced questions in Matter 7 (Meeting Housing Needs), Issue 1 – Affordable Housing – Policy H4. We support the questions Q1, Q2, Q3, Q4, Q5 and Q7 and hope these will lead to further modifications of the Exeter Plan to improve the delivery of much needed affordable housing.

By proposing a reduced level of affordable housing for brownfield sites we believe the council is at risk of not delivering an appropriate and necessary number of social homes for those who cannot afford open market rents, and are in temporary and sometimes inappropriate accommodation, often at great cost to the council.

It is our understanding that government has set/agreed an annual housing target that reflects the affordability gap in Exeter based on the difference between house prices and average wages. This calculation assumes an annual percentage of new homes being built as affordable homes, but if the council is now accepting that brownfield sites can only deliver affordable homes at a lower percentage is there a need for more homes to be built annually so the intended annual affordable homes target is met? The alternative is of course that the expectation for brownfield sites should deliver 35% affordable housing as Greenfield sites.

This issue and potential lack of affordable housing is compounded by the city council's identification of mainly brownfield sites for future development in the plan period. We support the strategy to develop brownfield sites because there are few suitable Greenfield sites left in the city, but there are of course more potential brownfield sites that can be developed if the council persist in the low percentage, particular the city council's Liveable Exeter identification of Marsh Barton for 5,000 homes.

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. This is of course also an issue of affordability and we will also be commenting upon Policy IF2 Viability later in the inspection process.

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 Red Cow.

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

[REDACTED]

K [REDACTED] Lewis.