

Participant Response to MIQs.

Examination of the Exeter Local Plan.

On behalf of Taylor Wimpey.

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1. Introduction

- 1.1. This hearing statement is submitted to the Exeter Local Plan Examination in response to the Inspector's Matters, Issues and Questions (version 1, as dated 6 January 2026).
- 1.2. It is prepared by Pegasus Group on behalf of our client, Taylor Wimpey UK Limited, who has land interests at Land at Attwells Farm, Exwick, Exeter, and follows our earlier representations to made to the plan at the Regulation 19 consultation stage in January 2025.
- 1.3. This statement deals specifically with:
 - **Matter 1: Legal Compliance** (Issue 1 – Duty to Cooperate)
 - **Matter 2: Housing Housing, Employment and Retail Need** (Issue 1 – Local Housing Need and the Housing Requirement)
 - **Matter 3: Spatial Strategy and the Distribution of Development** (Issue 1 – Spatial Strategy)
 - **Matter 4 – Site Allocations Process** (Issue 1 – Site Allocation Methodology)
 - **Matter 11 – Natural Environment** (Issue 1 – Landscape Setting Areas and Valley Parks – Policies NE1 and NE2)
- 1.4. It has been prepared in accordance with the relevant guidance set out by the Inspectors.
- 1.5. The Inspectors should be aware that our client's site at Land at Attwells Farm, Exwick, Exeter is one of the Edge of Exeter allocations within the emerging Teignbridge Local Plan.
- 1.6. This plan is, at the time of writing, at a very late stage of its examination¹. It is, therefore, important that this site is recognised within both Local Plans. This is particularly imperative given that part of our client's wider site sits within the boundaries of Exeter (see Figures 1 and 2 below). Whilst our client intends for the area within Exeter to be undeveloped, forming part of the access and public open space only, it should be identified within the Exeter Plan.

¹ Following the conclusion of the examination hearing sessions, Teignbridge Council published its schedules of modification for consultation on 30 July 2025. The consultation period ran from midday on 30 July until midday on 1 October 2025. The Planning Inspectors are now producing their report on the soundness and legal compliance of the plan, expected imminently. Teignbridge Council will consider any recommendations before presenting the final Local Plan to a Full Council meeting for consideration and adoption.



Figure 1: Illustrative Masterplan

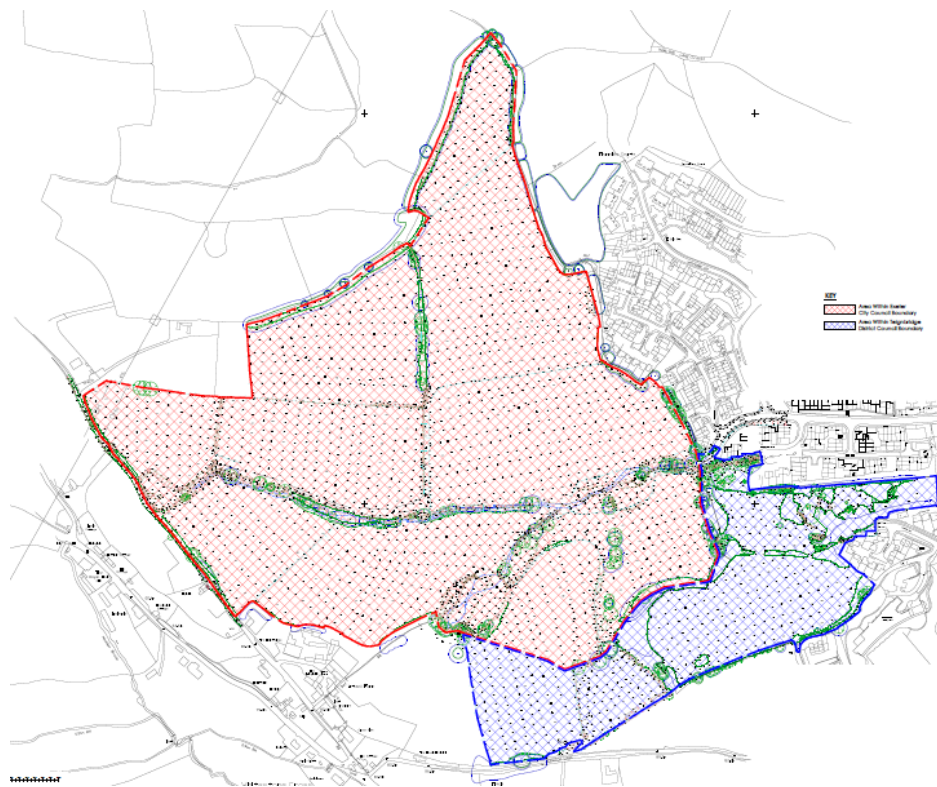


Figure 2: Location of Attwells Farm with Exeter City Council extent shown in blue

2. Matter 1 – Legal Compliance

Issue 1 – Duty to Cooperate

Q4. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to the advice contained in the National Planning Policy Framework ('the Framework') and the Planning Practice Guidance ('the PPG')?

Q5. Is the Plan consistent with paragraphs 24 to 27 of the Framework which require strategic policy-making authorities to maintain effective cooperation on strategic matters that cross administrative boundaries?

- 2.1. Section 33A of the 2004 Act establishes the duty of co-operation between Local Authorities in respect of sustainable development. At subsection (3) it states:

"The activities within this subsection are—

(a) the preparation of development plan documents,

(b) the preparation of other local development documents,

(c) the preparation of marine plans under the Marine and Coastal Access Act 2009 for the English inshore region, the English offshore region or any part of either of those regions,

(d) activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) that are, or could be, contemplated, and

(e) activities that support activities within any of paragraphs (a) to (c),

so far as relating to a strategic matter."

- 2.2. Paragraph 27(c) of the National Planning Policy Framework states that:

"Once the matters which require collaboration have been identified, strategic policymaking authorities should make sure that their plan policies align as fully as possible with those of other bodies where a strategic relationship exists on these matters, and take into account the relevant investment plans of infrastructure providers, unless there is a clear justification to the contrary. In particular their plans should ensure that...

(c) any allocation or designation which cuts across the boundary of plan areas, or has significant implications for neighbouring areas, is appropriately managed by all relevant authorities."

- 2.3. The proposed Teignbridge Local Plan 2020–2040 has an overall housing requirement of a minimum of 14,400 dwellings. It expects to deliver around 32% of these new homes on the edge of Exeter. This is unsurprising given the predominantly rural nature of the district and Exeter being much more significant in the settlement hierarchy than any settlements wholly within Teignbridge. It highlights the important function of Exeter for the surrounding authorities in terms of accommodation growth in sustainable locations.

- 2.4. The allocation for Attwells Farm (EE4) secures a minimum of 300 homes, with supporting text to that policy noting that the yield could be up to 375 units following the results of further landscape sensitivity assessment. The annual housing requirement for Teignbridge over the plan period is 720 dwellings, so the Attwells Farm allocation could contribute around half a year's supply, which is significant.
- 2.5. The allocation policy is very detailed and specifies a number of critical components and infrastructure to be delivered to support the new homes in order to create a sustainable place which is safe, well connected and provide for the needs of the new residents.

EE4: Attwells Farm

A new development of about 15 hectares within a wider site of 39 hectares is allocated at Attwells Farm, Exeter. The development will be constructed to the highest standards of design as set out in the Teignbridge Design Code and will be supported by documents as specified in Policy DW1.

The development will comply with all the requirements specified below, to deliver:

1. Approximately 300 homes providing a housing mix which meets the affordable housing target and a wide range of housing needs;
2. The development will provide a range of community infrastructure as identified through the Council's IDP, within walkable distances of new homes and will include the following:
 - a. Financial contributions to primary and secondary education including school transport;
 - b. Community focal point, which could include a village green or community square;
 - c. A mobility hub which, as a minimum, should provide space to enable buses to turn and wait, a bus stop, secure and covered bicycle parking, car club space, and e-bicycle and e-scooter hire; and
 - d. Provision of land within the development adjoining Exwick Heights Primary School for uses associated with the school.
3. Green Infrastructure:
 - a. At least 4 hectares of public open space across the site to include a combination of young people and children's play areas and other play facility opportunities integrated throughout the development, including a MUGA;
 - b. To ascertain no adverse effects on European Wildlife Site integrity mitigation measures for Exe Estuary SPA, including at least 6 hectares of SANGS to be provided on site including linked green spaces and corridors through the site to connect with Whitycombe Way Valley Park and Kinnerton Way County Wildlife Site;
 - c. Specific landscaping measures to minimise potential landscape impacts that retain and reinforce the setting of Exeter, as informed by a Landscape and Visual Impact Assessment, and shall avoid development of the upper slopes and ridges of the site;
 - d. Conserve or enhance the significance of heritage assets and their settings, including Cleve House, with development focussed on the lower parts of the site;
 - e. Specific ecological mitigations, including retention or addition of trees/hedgerows, provision of buffers from woodland and improvements to naturalise the watercourse; and
 - f. 12 full sized or 24 half sized allotment plots.
4. Access and Transport:
 - a. Creation of a low traffic neighbourhood built with full site permeability by foot and bicycle;
 - b. The design of pedestrian and cycle links should follow desire lines and ensure that they are safe, attractive and accessible to their many potential users;
 - c. New vehicular access taken from Kinnerton Way, which should investigate opportunities to link to Liverpool Hill;
 - d. Safe and accessible pedestrian and cycle links, having regard to the gradients on the site, with safe crossing links through the site and to:
 - i. Kinnerton Way and Sustainable Travel Route E18 as identified in the Exeter Local Cycling and Walking Infrastructure Plan;
 - ii. Exwick Lane and Exwick Heights Primary School;
 - iii. Rowhorne Lane.
 - e. Extension of existing bus services and provision of new bus stops to serve the new development;

- f. No vehicle connections to be provided onto Rowhorne Lane, with the exception of an access for emergency vehicle use only; and
 - g. Planning applications will be supported by full strategic highway modelling, to include rail/river crossings into Exeter.
 - 5. A layout informed by details of archaeological investigation, evaluation and mitigation; and
 - 6. Appropriate flood risk mitigation informed by a flood risk assessment and sustainable drainage strategy.
- Trigger points will be inserted into planning obligations to ensure key infrastructure is provided in a timely manner to serve occupiers of new homes, reflecting policy GP7 (Infrastructure & Transport Networks).

- 2.6. These detailed requirements have been established by Teignbridge Council following the submission of a masterplan by our client/detailed design work etc.
- 2.7. At paragraph 9.39 the supporting policy text states:
- "Part of the site lies within the boundary of Exeter City Council. This part of the site includes the pedestrian link to the school, safeguarded land associated with school uses, and the vehicular link to Liverpool Hill. Planning applications submitted will need to involve prior discussions with Exeter City Council and will be determined in liaison with Exeter City Council and Devon County Council."*
- 2.8. Accordingly, the failure of Exeter City Council to acknowledge or allocate Attwells Farm within its Local Plan has the clear potential to frustrate its delivery. In order for the new homes to be delivered as part of a sustainable development, which can be safely accessed and provides sustainable travel options, the Exeter part of the site is critical.
- 2.9. Should the part of the site within Exeter not be allocated within the Exeter Local Plan, then our client is wholly reliant on a 'speculative' planning application to secure that part of the proposals. This adds additional uncertainty and potential delays to the planning process, potentially delaying the delivery of much needed housing within Teignbridge and the wider region, and is at odds with a 'plan led' system.
- 2.10. This unwillingness is contrary to Sections 33A of the 2004 Act and paragraph 27 of the NPPF which are clear that activities feeding into plan making, including the drafting of strategic allocations and designations, should be considered co-operatively by all relevant authorities.
- 2.11. The implications of the failure to co-operate will negatively impact housing delivery across the region. Clearly functional housing markets are not limited to Local Authority boundaries and housing delivery needs to be planned and supported collaboratively across the wider area; this being obviously pertinent given parts of wider Exeter sit within other districts. Exeter represents a central hub within the region, and the fact that its suburbs/surrounds represent one of the most sustainable locations for development within Teignbridge and East Devon cannot be ignored.
- 2.12. Since our representations in January 2025, Exeter City Council and Teignbridge District Council have produced a Statement of Common Ground (June 2025) to support the Duty to Cooperate Statement.
- 2.13. Disappointingly, in respect of matters on spatial strategy, homes and site allocations (as well as almost every other topic), the response is simply that no earlier representations were made by Teignbridge District Council to the Regulation 19 Exeter Plan. It must be recognized that the duty to cooperate process is an iterative one and clearly the fact that

there is now a cross-boundary site allocation in a plan to be imminently adopted needs to be addressed.

- 2.14. The position in the Duty to Cooperate Statement is not reflective of the awareness the Council has had about Attwells Farm. Our client has sought to engage with Exeter City Council at an early stage through both discussions and formal representations to the Local Plan. Indeed, the Council's Duty to Cooperate Log (January 2026) notes online discussion in October 2022 pertaining to the landscape impact of development in relation to Attwells Farm. The cross-boundary co-ordination required to deliver the new homes at Attwells Farm has been repeatedly raised but does not seem to have been considered or appropriately responded to in the emerging Local Plan.

Q6. In terms of this issue, are there any other suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 2.15. Yes. The plan should be updated to include an allocation for the relevant part of Attwells Farm to support housing delivery within Teignbridge.

3. Matter 2 – Housing, Employment and Retail Need

Issue 1 – Local Housing Need and the Housing Requirement – Policy H1

Q1. What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

Q2. Have any changes in the methodology, since the preparation of the Plan, resulted in any meaningful or significant changes to the calculation?

- 3.1. The plan seeks to provide a minimum housing requirement of 642 homes per year over the plan period 2021 to 2041. This equates to 12,840 dwellings. In order to meet this target, the policy seeks to deliver 13,975 homes providing a circa 9% buffer over the minimum requirement.
- 3.2. The minimum housing requirement does not accord with the PPG. The emerging plan will benefit from the transitional arrangements within the December 2024 NPPF and will, therefore, be examined against the 2023 version of the NPPF. To qualify the plan has to meet the conditions set out within paragraph 234 of the December 2024 NPPF. In the case of the Exeter Local Plan part (a) of paragraph 234 applies. This states that the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need.
- 3.3. Since the update to the affordability ratios in March 2024, the standard method for determining local housing need, now creates a minimum need of **804** dwellings per annum (dpa) for Exeter. The proposed housing requirement of 642dpa therefore falls short of 80% of local housing need, which is now **643dpa**. This change demonstrates the vulnerability of having an adopted housing need which sits on the 'bare minimum' line. To 'future-proof' the plan it is strongly recommended that the Council seek to meet the minimum housing requirement of 804dpa, as set out within the standard method.
- 3.4. In broad terms, the identification of the housing requirement as a minimum and the provision of a buffer is supported. However, based upon the identified mix it is considered that a greater buffer will be required. A buffer figure closer to 20% should be considered to account for some sites taking longer than anticipated to deliver or non-delivery; this is in large part related to the reliance on brownfield sites and the lack of greenfield allocations.

4. Matter 3 – Spatial Strategy and Distribution of Development

Issue 1 – Spatial Strategy and Liveable Exeter Principles

Q2. Is the strategic approach of focusing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?

Q5. Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

Q10. Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints?

- 4.1. Policy H2 allocates sites for housing (with unit numbers) under the following categories:
 - Strategic brownfield – 3,194 homes
 - Large scale – 1,321 homes
 - Major – 823 homes
 - Minor – 31 homes
- 4.2. Strategic mixed use brownfield sites account for 3,194 homes of a total of 5,369 homes to be delivered on the site allocations. This represents almost 60%. Furthermore, many of the 'large scale' and other opportunities are also brownfield (e.g. Heavitree police station, Whipton Community Hospital, Mary Arches Car Park), taking the total to over 70%. In our previous representations we have explained why the costs of brownfield development together with the application of the Liveable Exeter principles means that viability on these sites will be challenging. This is recognized in the fact that brownfield sites will only be expected to provide 15% affordable housing compared with 35% on greenfield sites, resulting in a vulnerable affordable housing supply.
- 4.3. Despite being a 'city' authority, greenfield opportunities within the authority do exist.
- 4.4. However, the designation of "Landscape Setting Areas" (policy NE1 – see our commentary on Matter 11 below) combined with the Council's focus upon urban brownfield regeneration areas creates a significant risk that the plan will not be effective in delivering the housing and employment needs and aspirations of the city.
- 4.5. It is not appropriate to reject greenfield opportunities because they will 'grow' the extent of the city. This is an inevitability when applying the NPPF principles of sustainability in choosing where to site new development.

4.6. Greenfield locations can be sustainable in terms of travel opportunities or can be made to be. Many of the greenfield locations are actually closer to Exeter City Centre and more walkable to key rail stations than existing areas of the city. Other improvements and interventions can be secured through allocation.

4.7. Indeed, in failing to acknowledge the Attwells Farm allocation in Teignbridge, the Exeter Local Plan could frustrate the delivery of a proposed safe route to school as part of this allocation. This exemplifies the manner in which joined-up thinking is required to consider the spatial strategy in a holistic way, which can be mutually beneficial to both parties in cross-boundary situations to create sustainable places.

Q8. Do the Liveable Exeter principles apply to greenfield development, or just large-scale brownfield developments?

4.8. It is understood that the Liveable Principles will be applied to brownfield sites only. A minor modification to the policy wording should be made to clarify this point.

5. Matter 4 – Site Allocations Process

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?

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

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

5.1. Paragraph 2.1 of the HELAA (September 2025) states:

“This fourth edition of the Exeter HELAA assesses the potential for housing and economic development of 129 sites in Exeter. Appendices A and B contain the assessments of sites originally assessed in the first and second editions of the HELAA. These sites were submitted for assessment in three Calls for Sites: the first held in 2021, the second as part of the Regulation 18 consultation on the Outline Draft Exeter Plan in 2022 and the third held in late 2023/early 2024 as part of a Regulation 18 consultation on the Full Draft Exeter Plan.”

5.2. Pegasus Group submitted representations on behalf of our client in respect of Attwells Farm in response to those second and third exercises. However, there is no mention of the site in the HELAA.

5.3. Clearly, the consideration of Attwells Farm as an allocation serves no purpose as “housing land” for the purposes of delivering homes against Exeter’s housing requirement. However, there is no reason why, in the interests of the duty-to-cooperate, it could not have been acknowledged through this process, thus allowing the land to be allocated through the plan for this purpose.

5.4. A modification to include Attwells Farm as an allocated site should be made.

6. Matter 11 – Natural Environment

Issue 1 – Landscape Setting Areas and Valley Parks – Policies NE1 and NE2

Q1. What are Landscape Setting Areas and Valley Parks and what is the justification for their inclusion in the Plan?

Q2. How do they differ from site allocations? How were the areas and parks identified? Were alternatives considered and/or discounted?

Q3. How would the Landscape Setting Areas and Valley Parks designations be expected to operate? How would a decision-maker be expected to react to a proposal for development within one of these locations?

Q4. Would all the Landscape Setting Areas and Valley Parks identified by Policies NE1 and NE2 be classified as ‘valued landscapes’ for the purposes of paragraph 180 a) of the Framework? If so, what is the evidence to justify this approach?

Q5. Are the requirements set out in policies NE1 and NE2 justified, effective, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 6.1. The designation of “Landscape Setting Areas” (policy NE1) in a ring around the whole of the northern and western edges of the city (among other areas) reads as an effective attempt to create a ‘Green Belt’. This is because the policy sets a higher bar in terms of landscape impact when assessing planning applications than would otherwise be applied.
- 6.2. Policy NE1 refers to valued landscapes, yet the evidence base is restricted to the identification of landscape value. There are important differences; being of high value does not equate to being a valued landscape in the context of the NPPF and the evidence base fails to sufficiently address those special qualities rather than more generic judgements.
- 6.3. Moreover, it is notable that the draft NPPF (published for consultation in December 2025) removes any reference to undefined “valued” landscapes – now only “Protected Landscapes” which are limited to National Parks, the Norfolk and Suffolk Broads and National Landscapes in England are afforded enhanced protections. This is a clear indication that the government only wishes to afford special protections to those landscapes of greatest significance.
- 6.4. The supporting evidence ‘2022 Landscape Sensitivity Assessment’ is noted. This study simply carves up all urban fringe land and provides an assessment. It is notable that no areas are identified as low sensitivity, and in that context (i.e. without a broader graduation of sensitivity across the landscape as a whole) it is difficult to see how the 2022 LSA is anything more than a blanket local landscape designation rather than something more constructive that can be used to guide development to the least sensitive parts of the area.
- 6.5. It should be stressed that our client is not promoting any development within the identified Landscape Setting Area, apart from the access to the site. Other than this, this area is

currently proposed to be open space, which will be improved through supplemental planting, as well including a footway and cycle connection to Exwick Lane.

- 6.6. Our client's landscape assessment identifies that the site itself is visually well contained due to a combination of landform, vegetation and the settlement edge. This isolates the developable areas of the site to within a discreet bowl-shaped pocket of landscape that serves to minimise the wider landscape impact of development within this location, such that it can be assimilated into the landscape. Hence, our analysis identifies this is not a sensitive landscape.

7. Summary and Conclusions

- 7.1. The city of Exeter – albeit located in the main within the jurisdiction of Exeter City Council – is important for the growth of the region as a whole, and both its Local Plan and those of neighbouring authorities need to plan appropriately and collaboratively to reflect this and to ensure sufficient housing delivery.
- 7.2. Our client's site (Land at Attwells Farm, Exwick) is clearly a sustainable location for new development. Whilst not directly delivering 'The Exeter Plan' housing requirement our client's site will undoubtedly assist in meeting the wider housing needs of the city and of the region, through the provision of much needed market and affordable housing across a variety of size and tenures. This is clearly important given the functional interrelationship between Exeter City and the surrounding authorities owing to Exeter's role as the principal settlement within the region.
- 7.3. The emerging Local Plan is currently fundamentally flawed because:
- The plan fails to establish a sufficient housing requirement which is consistent with the PPG, and moreover, in our client's view, should be further increased to meet the current local housing need (804dpa) for the area.
 - The duty-to-cooperate has not been sufficiently demonstrated. The site at Attwells Farm will deliver a significant number of new homes within Teignbridge and its effective delivery is contingent on securing supporting infrastructure within the Exeter City Council boundary; this should be reflected in the Exeter City Plan.
 - The application of policy NE1 is unjustified in landscape terms and serves to artificially limit greenfield opportunities for new development. This is of particular concern where there is already a high degree of reliance of brownfield sites which may not be deliverable.
- 7.4. Teignbridge Council is expected to imminently adopt its Local Plan within which our client's site is allocated. For the reasons set out above, we once again request that to support its holistic delivery a modification be made to the Exeter City plan to also allocate the part of the site within the Exeter boundary to assist with the delivery of housing at the site.

Town & Country Planning Act 1990 (as amended)
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