

Exeter Plan

Hearing statement

Matter 4:
Site Allocations Process and
Methodology

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1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 4, which addresses the site allocations process and methodology.
- 1.2. The statement covers one issue:
 - Issue 1: Site Allocation Methodology

2. 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?

- 2.1. The Council took a positive and proactive approach to considering sites for inclusion as allocations in the Publication Plan, through preparation of the HELAA (EVB:H-02a-d). The HELAA process is outlined below:
- Sites were identified for assessment via three calls for sites undertaken throughout plan preparation¹; by writing to the landowners of sites identified as having housing or employment development potential in the Urban Capacity Study (EVB-H-10b and EVB-H10d), Strategic Brownfield Sites Study (EVB-H-09) and Liveable Exeter Prospectus (EVB-S-01a); by writing to the landowners of all undeveloped housing and employment allocations in the current development plan; and by writing to some landowners proactively due to officer knowledge of undeveloped land in the city.
 - The site identification process covered a variety of uses including housing, pitches and plots for Gypsies, Travellers and Travelling Showpeople and employment.
 - The HELAA assessed sites for housing that:
 - o Met the site size thresholds for assessment set out in paragraph 009 of the HELAA PPG; and
 - o Were submitted for housing assessment by the landowner, or were already allocated for housing in the development plan, or already had planning permission for housing, or were already entirely or partly in residential use.
 - The HELAA assessed sites for employment development that:
 - o Met the site size thresholds for assessment set out in paragraph 009 of the HELAA PPG; and
 - o Were submitted for employment assessment by the landowner, or were already allocated for employment in the development plan, or already had planning permission for employment use, or were already entirely or partly in employment use.
 - Based on the HELAA assessment, each site was given a Green, Yellow, Amber or Red rating for potential housing and/or employment development. The 4th Edition HELAA (EVB-H-02a: pages 13-14, paragraph 3.20 and table 2) explains the rating system. The Council used the ratings in the 3rd Edition HELAA (EVB-H-02b) to help decide which sites to identify for allocation in the Publication Plan:
 - o All sites rated Green or Yellow for housing are identified as housing or strategic mixed-use brownfield allocations, UNLESS they already have planning permission for housing (meaning allocation is not necessary), or they are rated Green for employment.

¹ November 2020 to January 2021; at Regulation 18 stage in 2022; and at Regulation 18 stage in late 2023/early 2024.

- All sites rated Amber for housing development are identified as housing or strategic mixed-use brownfield allocations UNLESS there are clear reasons not to allocate (for example, the site is a community facility and there is no clear potential for the provision of a replacement facility; or the site is in multiple ownership (freehold and leasehold) and not all land parcels have been confirmed as available for development).
 - No sites rated Red for housing are identified as housing or strategic mixed-use brownfield allocations.
 - All sites rated Green for employment are identified as employment or strategic mixed-use brownfield allocations, UNLESS they are already in employment use, or already have planning permission for employment use (meaning allocation is not necessary) or already have planning permission for another use.
 - All sites rated Amber for employment are identified as employment or strategic mixed-use brownfield allocations, UNLESS the site is a community facility and there is no clear potential for the provision of a replacement facility.
- 2.2. The SA concludes that no HELAA sites stand out as being overwhelmingly more or less sustainable for housing or employment development than other options, although four sites are assessed as having significant negative effects across five or more SA objectives (see EXM-02a: page 93, paragraph 5.34; the assessment of site ref. 152 on page 101; and the assessments of site refs. 12, 34 and 39 on page 103). None of these sites are identified for allocation in the Exeter, having all been discounted through the HELAA process.

Q2. 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?

- 2.3. The viability and deliverability of sites was considered as set out below. No sites found to be undeliverable in the HELAA or other evidence are identified for allocation in the Plan.

Viability

- 2.4. The Local Plan Viability Assessment LPVA (EVB-IF01a) specifically responded to the types of development proposed in the Plan, including by testing a range of housing typologies on brownfield sites. The LPVA concludes that typologies representative of development on the Plan's brownfield and greenfield housing allocations are viable (pages 41 to 45).
- 2.5. The LPVA-A (EVB-IF-01b: chapter 3) explains how the viability and deliverability of the five strategic mixed-use brownfield sites, five predominantly residential large-scale sites, and a representative employment site (Land adjacent to Sandy Park) were specifically tested. For the strategic mixed-use brownfield sites, the starting point was to engage with the site promoters, to obtain information about site status and explore forms of development, any deliverability issues and site constraints. The LPVA-A concludes that all of the sites tested are viable, including those sites where viability has proven

challenging (EVB-IF-01b: page 18, paragraphs 4.6 to 4.7; page 22, paragraphs 5.11 to 5.12; page 25, paragraphs 6.9 to 6.10; page 28, paragraph 7.8; page 30, paragraphs 8.9 to 8.10; page 33, paragraph 9.11; and page 35, paragraph 10.11).

Deliverability

- 2.6. The HELAA (EVB-H-02a-d) considered site deliverability by assessing the suitability, availability and achievability of each site. Assessments were undertaken in accordance with the 2021 HELAA Methodology (EVB-H-02e), which is in turn consistent with the HELAA PPG.
- 2.7. The Council shares EVB-H-02e with neighbouring local authorities. It is the latest edition of the Methodology: it and earlier editions have been found sound at the Examinations of the Exeter Core Strategy (examined 2010/11), Teignbridge Local Plan (examined 2014), East Devon Local Plan (examined 2016), Mid Devon Local Plan (examined 2019/20) and Dartmoor Local Plan (examined 2020/21). The Methodology is consistent with guidance in the HELAA PPG and has been endorsed by the HELAA Panel - a Panel of key stakeholders including developers, land agents, planners and statutory bodies. Details of the Panel are provided in paragraph 3.18 of EVB-H-02a. As such, the Methodology is a tried and tested way to assess site deliverability.
- 2.8. The 4th Edition HELAA (EVB-H-02a: pages 11 to 12, paragraphs 3.10 to 3.14) explains the site suitability assessment process. This included consideration of a wide range of relevant criteria and consultation with statutory bodies, stakeholders and local authority officers, as set out in the Council's response to questions 3 and 4 below. No sites assessed as unsuitable for housing development in the 3rd Edition HELAA (EVB-H-02b) are identified as housing allocations in the Publication Plan. No sites assessed as unsuitable for employment development in the 3rd Edition HELAA (EVB-H-02b) are identified as employment allocations in the Publication Plan.
- 2.9. The 4th Edition HELAA (EVB-H-02a: page 12, paragraphs 3.15 to 3.16) explains the site availability assessment process. This was supplemented by further availability checks undertaken by the Council in late 2024 and during 2025. The Site Availability Evidence shows that all sites (except 88 Honiton Road, which the Council suggests is omitted as an allocation as it is no longer available – see SMM27 of the Schedule of Suggested Modifications: CSD-03: page 3) identified for allocation in the Publication Plan are available for development (EXM-02o: pages 4-10).
- 2.10. The 4th Edition HELAA (EVB-H-02a: pages 12 to 13, paragraphs 3.17 to 3.19) explains the site achievability assessment process. All assessments were undertaken by the HELAA Panel, which included individuals experienced in brownfield development. As such, the Panel was well placed to advise on the viability and deliverability of challenging sites. No sites assessed as unachievable for housing or employment development in the 3rd Edition HELAA (EVB-H-02b) are identified for allocation in the Publication Plan.
- 2.11. In addition to the HELAA, significant site-specific work has been undertaken to demonstrate the deliverability of the strategic mixed-use brownfield allocations:
 - For Water Lane, the Council (working with partners including Devon County Council, the Environment Agency and landowners), has prepared or commissioned the Liveable Water Lane SPD Transport and Mobility

Technical Note (EVB-S-04), the Water Lane Primary School Options Appraisal (EVB-S-05), the Haven Road Position Statement (EVB-S-06), the Water Lane Views Analysis (EVB-S-07), the Level 1 and 2 SFRAs (EVB-CC-13a-c) and the Water Lane emergency access and egress route plan (EVB-CC-14a).

- In addition, with funding and support from Homes England, the Council has recently commissioned Burro Happold to prepare a costed Infrastructure Delivery Plan specific to Water Lane. This will support deliverability by confirming what infrastructure costings, how these can be apportioned across landownerships, and how any challenges can be derisked. The study is due to be completed by the end of March 2026. The deliverability of Water Lane is also underlined by Homes England's interest in land acquisition (see EVB-H-06: additional comments column on pages 1-7).
 - For East Gate, Red Cow, Exe Bridges Retail Park and South Gate, the Council (working with partners including Devon County Council, the Environment Agency and landowners) has prepared or commissioned the Red Cow and Exe Bridges emergency access and egress route plans (EVB-CC-14b and 14c), the Level 1 and 2 SFRAs (EVB-CC-13a-b and d-f), the East Gate Delivery Study (EVB-H-07) and the Exeter Plan Strategic Allocations: Views, Heights and Capacity Study (EVB-HH-03).
- 2.12. The Housing Market Insights Report (EVB-H-12) assesses the appetite for private and public sector investment in Exeter, bearing in mind the brownfield focus of the Plan's spatial strategy. Based on market engagement, the report concludes that there is positive market interest in brownfield development in Exeter, notwithstanding potential costs and complexities (see page 22). As such, the report helps demonstrate the deliverability of brownfield sites identified for allocation.
- 2.13. Housing deliverability has also been considered in the Exeter Plan Housing Trajectory (EVB-H-03), the 2025 September Five Year Housing Land Supply Statement (EVB-H-04a) and the Exeter Plan Delivery Schedule (EVB-H-06). In those documents, delivery assumptions are robustly based on:
- Advice provided by developers.
 - Intelligence provided by planning officers.
 - Build rate assumptions in the 2021 HELAA Methodology (EVB-H-02e, page 20), which have been endorsed by the HELAA Panel.
 - For the Plan's strategic mixed-use brownfield allocations, a sense-check against delivery rates achieved at seven large urban brownfield developments elsewhere in the country (EVB-H-05: page 24, table 6.2). Table 2 below shows that the Council's build rate assumptions are broadly consistent with these case studies.

Table 2: Comparison of build-out rates in EVB-H-05 and the Plan's strategic mixed use brownfield allocations		
Site	Average annual built-out	Peak year build-out
Prospect Place, Cardiff	75	222
Hungate, York	33	195
University Campus, Chelmsford	129	426

XI Media City, Salford	138	275
Chatham Street Car Park, Reading	102	120
Land at Canons Marsh Road, Bristol	45	145
Ordsall Lane, Salford	197	273
Water Lane ²	169	220
East Gate ³	69	202
Red Cow ⁴	56	94
Exe Bridges Retail Park ⁵	40	50
South Gate ⁶	27	50

Infrastructure

2.14. The Infrastructure Delivery Plan (IDP) (EVB-IF-02a-c) was prepared iteratively alongside the HELAA, LPVA and LPVA-A. Where specifically related to sites, infrastructure requirements identified in the IDP were taken into account in the HELAA site assessments, the LPVA and LPVA-A.

Q3. 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?

2.15. The infrastructure requirements of growth were considered through:

- Consultation with the following infrastructure stakeholders as part of the HELAA (EVB-H-02a-d) process:
 - o Highways England
 - o Natural England
 - o Environment Agency
 - o NHS
 - o Sport England
 - o South West Water
 - o Devon County Council – Highways and Transport
 - o Devon County Council – Education
 - o Devon County Council – Minerals and Waste
 - o Devon County Council – Flooding
 - o Exeter City Council – Parks and Open Spaces

² Annual average and peak year build outs for Water Lane have been calculated from site refs. MSD38(s), MSO06(s), 15/116, 15/16, 15/117, 15/130, 15/167 and 15/168 on pages 33, 37, 60 and 61 of the Exeter Plan Housing Trajectory: EVB-H-03).

³ Annual average and peak year build outs for East Gate have been calculated from site refs. 145/53, 145/102, 145/102, 145/166, 145/156 and 145/103 on pages 61 and 62 of the Exeter Plan Housing Trajectory: EVB-H-03).

⁴ Annual average and peak year build outs for Red Cow have been calculated from site refs. 146/22 and 146/170 on page 62 of the Exeter Plan Housing Trajectory: EVB-H-03).

⁵ Annual average and peak year build outs for Exe Bridges Retail Park have been calculated from site ref. 142 on page 62 of the Exeter Plan Housing Trajectory: EVB-H-03).

⁶ Annual average and peak year build outs for South Gate have been calculated from site ref. 169 on page 63 of the Exeter Plan Housing Trajectory: EVB-H-03).

- Consultation with the following infrastructure stakeholders during preparation of the IDP (EVH-IF-02a):
 - o Internal Exeter City Council departments
 - o Environment Agency
 - o NHS
 - o South West Water
 - o National Grid Electricity Distribution
 - o National Grid Electricity Transmission
 - o Devon and Cornwall Constabulary
 - o Devon County Council – Highways and Transport
 - o Devon County Council – Education
 - o Devon County Council – Minerals and Waste
 - o Devon County Council – Adult and Young People’s Services
- Regulation 18 and 19 representations made by infrastructure stakeholders.

2.16. The information provided is reflected in the HELAA site assessments which, as explained in the Council’s response to question 1 above, formed the basis of 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?

2.17. The site selection process was robust: as explained above, it was based on the HELAA and consideration of reasonable alternatives in the SA. The process also considered viability and deliverability, and was informed by input from an extensive range of stakeholders.

2.18. The Council sought to maximise the number of sites assessed in the HELAA, and thereby the SA, as set out in paragraph 2.1 of this Statement. Therefore, an appropriate selection of potential sites was assessed.

2.19. The HELAA and SA considered an appropriate range of criteria: constraints relating to nature, landscape, flood risk and drainage, heritage conservation, open space and recreation, minerals and waste, employment and housing land supply, access and movement, health and safety, infrastructure capacity, retail and community facilities were assessed.

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

2.20. Suggested main modifications SMM20, SMM26 and SMM27 (CSD-03: pages 10 and 12) suggest removing three site allocations from the Plan. They are necessary to meet tests of soundness b) and c) – justified and effective. Deletion of Belle Isle Depot, Land at Hamlin Lane and 88 Honiton Road from policy H2 will ensure that the Plan only allocates sites that are suitable,

available and achievable for housing, based on updated assessments of site constraints and availability.

3. Summary

- 3.1 This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 4 of the Exeter Plan Examination.
- 3.2 All questions associated with the one issue for Matter 4 have been answered.