

The Exeter Plan Publication Plan: Regulation 19 December 2024 (dLP)

Stuart Partners Ltd

Matter 5 – Housing Land Supply

- Issue 2 – Five-year Housing Land Supply

Additional Site Assessment

Introduction

CarneySweeney acts for Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon District.

We previously submitted a Hearing Statement covering Matter 5 and indicated that we wished to provide a review of all sites within the five year land supply horizon that we propose to raise at the Examination. The Inspectors requested that this review should be submitted by 20th February 2026.

Methodology

The review of sites below follows the chronology of the Council’s housing trajectory, firstly assessing sites with planning permission (although many do not) and then the proposed site allocations.

Sites within the 5-year trajectory (as amended) from 2027/28 to 2031/32 are required to comply with the definition of a deliverable site within the meaning of the NPPF. The definition splits sites into ‘Category A’ with detailed planning permission and ‘Category B’ with outline permission or an allocation.

Each site is named in the tables below and identified as either within the 5 year trajectory or post 2021/32. A review of the planning status for each site has been undertaken using the Council’s website and comments are provided for each contested site. Where relevant, a deduction to the number of units within the trajectory is given for each site.

Permissions Trajectory

Site	Comments
102-104 Fore Street (11/1065/FUL) Post 2031/32 trajectory	The Council contends that the permission has been implemented however it is not evident that works have begun to sufficiently implement. The amended permission was granted in September 2011. It is therefore considered unlikely that the permission will be implemented and can be relied upon within the supply of housing for the Local Plan. 13 units are requested for removal from the trajectory.
130 Fore Street (12/1426/FUL) Post 2031/32 trajectory	The full permission for 13 flats was approved in February 2013. Subsequent variations to the approved plans have been approved in 2023 and one submitted in January 2026 remains pending consideration. An NMA was approved (Ref. 25/1826/NMA) in January 2026 to reduce the number of flats from 13 to 10. The Council contends that this permission has been implemented. It is unclear whether works were carried out to implement the permission within the



	timeframe, however by virtue of the approval of subsequent S73 and NMAs, it is likely that it was. In any case, 3 dwellings should be removed from the trajectory.
Land for residential development at Hill Barton Farm, Hill Barton Road 5 year supply trajectory	Outline approval for 285 dwellings was granted in October 2022. An application for Reserved Matters for 274 dwellings was submitted in December 2024 and is pending consideration. Updated plans were most recently provided in August 2025. At the time of writing, this is a Category B site and should be excluded from the 5YS trajectory. Even if the current circumstances were to change, the rate of completions within the trajectory, commencing in the 2027/28 period seems optimistic. All 274 units should be removed from the 5YS trajectory.
Bricknells Bungalow, Old Rydon Lane (14/2007/OUT) Post 2031/32 trajectory	Outline approval for 63 dwellings was granted in August 2015. Reserved Matters approval for 34 dwellings was submitted in August 2018 and is pending consideration. Comments were most recently submitted against the application in 2024. Whilst a reserved matters is pending, this appears to have stalled with outstanding objections from Urban Design and the LLFA. The time limit for the submission of further RM's has now passed, and the outline has lapsed. It is therefore considered unlikely that the development of 24 dwellings will be delivered within the plan period and should not be included in the trajectory. 24 units are requested for removal from the trajectory.
The Old Coal Yard, Exmouth Junction, Mount Pleasant Road, (Phase 2) (19/0650/OUT) (22/0037/VOC) 2026/27 period of completions	Outline planning permission for up to 400 residential dwellings and 65 senior living care units was granted in May 2019 as amended by 22/0037/VOC. A landscaping Reserved Matters was subsequently approved in October 2022. The Council states that the permission has been implemented, and 165 dwellings are expected to be delivered in 2026/27. It is unclear whether any of the consented senior living care units are included within this figure. If the latter, please confirm the ratio applied. This has implications in terms of the number of assumed completions since the plan period started, before the 5-year period commences in 2027/28.
The Harlequin Centre, Paul Street (21/1104/FUL) 5 year supply trajectory	Full planning permission was granted in January 2022 for 383 co-living bedspaces, comprising 276 self-contained co-living studios and 107 co-living cluster flats. A ratio of 1.9:1 has been applied to the cluster flats for the purposes of calculating the equivalent dwelling yield. The Council states that the permission has been implemented; however, it is unclear whether a



	lawful material commencement has in fact taken place. No clear evidence of implementation has been identified. Furthermore, the Council's own trajectory notes indicate that delivery has been delayed pending agreement of a Deed of Variation to the Section 106 Agreement and the finalisation of a headlease with the Council. At the time of writing, no Deed of Variation appears to have been submitted or completed. The timing, scope and acceptability of these amendments therefore remain uncertain. In the absence of clarity on (i) whether the permission has been lawfully implemented, and (ii) when the necessary Section 106 and land interest matters will be resolved, the anticipated delivery of the full 332 dwellings in 2028/29 is considered optimistic and insufficiently evidenced. All 332 units should be removed from the trajectory
Hurst Almshouses, 2-24 Fairpark Road (18/0598/FUL) 5 year supply trajectory	Full planning permission was granted in October 2024 for the demolition of the existing dwellings and redevelopment of the site to provide 31 one- and two-bedroom almshouse flats. It is first noted that the approved site plan confirms the site currently comprises three existing residential properties. On that basis, the net gain arising from the scheme would be 28 dwellings, and the housing trajectory should reflect this net figure rather than the gross total of 31 units. It is presumed that a ratio has been applied to show 19 units in the trajectory, although this is not confirmed. It is further noted that no pre-commencement conditions have yet been discharged. In the absence of lawful commencement, the permission will lapse in October 2026. Given the need to discharge pre-commencement conditions and secure implementation within the remaining timeframe, the assumed delivery of units in 2028/29 appears optimistic and insufficiently evidenced at this stage. 19 units are requested to be removed from the trajectory.
Land at Corner of Retreat Drive, Topsham (17/1656/FUL) 5 year supply trajectory	Full planning permission was granted in January 2018 for the construction of 10 dwellings. The Council contends that the permission has been implemented and, in the absence of a completed developer trajectory form, assumes delivery in accordance with the 2021 HELAA Methodology. However, it is notable that there have been multiple attempts to amend the scheme to reduce the number of dwellings from 10 to 8, the most recent



	of which was refused in November 2025. This repeated effort to decrease the quantum of development suggests that the originally approved scheme may not be viable or deliverable in its current form. In the absence of clear evidence of progress toward completion — and given the applicant's apparent intention to alter the scheme — reliance on a standardised HELAA delivery assumption appears optimistic. Greater weight should be given to the site's planning history and the lack of demonstrable build-out activity when assessing its contribution to the housing land supply. It is therefore requested that 10 dwellings be either removed from the trajectory
231 High Street (22/1574/PDJ) 5 year supply trajectory	Prior approval for the change of use of first and second floor offices to 16 self-contained apartments in April 2023. The Council notes that the development has not commenced in which case, if no implementation occurs prior to April 2026, the permission will lapse. Given that the permission has been granted for nearly 3 years and no implementation has occurred, it is queried whether delivery is likely within both the plan period as a whole and the five-year period. The Council have identified the following change of use permission (25/0225/PDCD) however no such permission is available on the Council's website. It is therefore requested that 16 units be removed from the trajectory.
Haven Banks Retail Park, Water Lane (22/1145/FUL) Post 2031/32 trajectory	Planning application reference (22/1145/FUL) relates to the comprehensive redevelopment of Haven Banks to deliver a mixed-use neighbourhood. Although the application received a resolution to grant planning permission in 2023, no decision notice has yet been issued. In the absence of a formal grant of planning permission — and therefore no extant, implementable consent — the scheme cannot presently be relied upon with certainty and is a Category B site. The delay between resolution and issuing of the decision suggests that outstanding matters remain to be resolved, potentially including completion of a Section 106 Agreement and/or finalisation of planning conditions. Until these matters are concluded and permission is formally issued, delivery of units from the site remains uncertain. Accordingly, any assumed contribution to housing supply at this stage should be treated with caution.
Land at Summerland Street (23/0490/FUL)	Full planning permission was granted in October 2024 for the construction of up to 145 co-living



5 year supply trajectory	studio units. A 1:1 ratio has been applied, equating each bedspace to a dwelling for the purposes of housing supply. However, the approved plans do not demonstrate that the studios are self-contained. In particular, the drawings do not show individual kitchens or bathroom facilities, which are essential for independent occupation. Without these facilities, the units are effectively communal or cluster-style accommodation and cannot reasonably be treated as individual dwellings. Accordingly, the application of a 1:1 ratio overstates the housing contribution of the scheme. A reduced conversion ratio, consistent with the Council's adopted HELAA methodology for co-living or cluster units of 1.9:1, should be applied. This would equate to 76 dwellings. Therefore, 69 units should be removed from the trajectory.
Exeland House, Tudor Street (22/1548/FUL) Post 2031/32 trajectory	Application 22/1548/FUL proposes the renovation, conversion, and change of use of Exeland House to establish a 34-unit co-living scheme. Although the application remains pending determination, there has been negligible progress on the case since 2024. The Council has included all 34 units within the Local Plan housing trajectory, applying a 1:1 delivery ratio. Given that these units are self-contained, this classification appears technically accurate. However, considering the significant time elapsed since submission without a formal decision, and the lack of recent updates or amendment, the deliverability of this scheme within the immediate housing land supply is questionable. Consequently, its inclusion in the trajectory should be treated with caution.
Land off Pendragon Road (22/0511/OUT) Post 2031/32 trajectory	Outline planning permission for up to 100 dwellings was granted in September 2024. However, no Reserved Matters (RM) application has been submitted to date, and the statutory deadline for submission is set to expire in September 2027. Furthermore, there is no evidence that any pre-commencement conditions have been discharged. Given the absence of a submitted or approved RM application, and the lack of technical progress on site-specific conditions, the deliverability of these units within the current housing trajectory should be treated with caution.
Water Lane (South) (23/1007/OUT) Post 2031/32 trajectory	Planning application reference (23/1007/OUT) relates to the comprehensive redevelopment of land at Water Lane South.



	Although the application received a resolution to grant planning permission in January 2025, no decision notice has yet been issued. In the absence of a formal grant of planning permission — and therefore no extant, implementable consent — the scheme cannot presently be relied upon with certainty. The delay between resolution and issuing of the decision suggests that outstanding matters remain to be resolved, potentially including completion of a Section 106 Agreement and/or finalisation of planning conditions. Until these matters are concluded and permission is formally issued, delivery of units from the site remains uncertain. Accordingly, any assumed contribution to housing supply at this stage should be treated with caution. It is also noted that the submitted scheme indicates an estimated yield of 900-980 dwellings whilst the Council note the scheme will deliver 1140 dwellings. This discrepancy should be explained.
The King Billy and 26-28 Longbrook Street (25/0318/FUL) 5 year supply trajectory	Planning application reference (25/0318/FUL) relates to the development of 108 self-contained studios for student accommodation. The application was submitted in March 2025 and is pending determination. The Council have applied a 1:1 ratio and include the full 108 units within the five-year housing land supply years 2027/2028. The inclusion of the above site within the five-year housing land supply is contested because there is no evidence to demonstrate that the student accommodation proposed will release existing homes into the general housing market, as required by the Planning Practice Guidance. It is therefore requested that 108 units be removed from the trajectory.
West Park, University of Exeter, Stocker Road (24/0184/VOC) 5 year supply trajectory	This scheme relates to the provision of 538 units of student accommodation, all of which are included within the five-year supply. As contested above, there is considered to be a lack of evidence to justify the inclusion of student accommodation within the five-year supply and the 538 units should therefore be removed from the trajectory.
Apparelmaster, Cowley Bridge Road (23/0232/FUL) 5 year supply trajectory	This scheme relates to the provision of 236 units of student accommodation. As contested above, there is considered to be a lack of evidence to justify the inclusion of student accommodation within the five-year supply and the 236 units should be removed from the trajectory.
68-72 Howell Road (21/1014/FUL) 5 year supply trajectory	This scheme relates to the construction of purpose-built student accommodation comprising 26 no. bedrooms. The scheme has not been included within the trajectory due to the residential scheme

	being more likely to come forward. Should the Council consider to include these units within the trajectory, robust evidence would be required to support this.
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Allocations Trajectory

Site	Comments
East Gate City Point	East Gate City Point relates to the proposed allocation for redevelopment. Units are proposed to be delivered starting in 2032. It is however noted that the site has significant constraints, as acknowledged by the Council in the HELAA (4 th Edition) including risk of surface water flooding; potential loss of public car parking, existing employment uses, homes and community facilities; impact on heritage assets; the area of archaeological importance; and the presence of significant trees. Also of note are potential impacts relating to contaminated land, loss of retail, noise, air quality and ecology. Considering these constraints, the likelihood of development coming forward within this timeframe should be considered with caution.
East Gate Civic Centre	East Gate Civic Centre relates to the proposed allocation for redevelopment. Units are proposed to be delivered starting in 2032. As with the site above, East Gate Civic Centre is a constrained site with the Council acknowledging potential loss of employment use and a community facility, the conservation area and nearby heritage assets. Additional potential constraints include archaeology, ecology, land contamination, air quality and noise. Considering these constraints, the likelihood of development coming forward within this timeframe should be considered with caution.
East Gate Manor Court	East Gate Manor Court is expected to deliver units starting from 2032. The Council however acknowledges that the site is subject to significant constraints. The key constraints are the potential loss of public car parking, existing employment uses and open space; and the impact on trees and heritage assets. Also of note are potential impacts relating to contaminated land, archaeology, noise, air quality, ecology. Considering these constraints, the likelihood of development coming forward within this timeframe should be considered with caution.
East Gate Clarendon House 5 year supply trajectory	Clarendon House is subject to a full application (ref.25/1082/FUL) for student accommodation which is currently pending determination. The scheme includes 134 studio flats which count towards the housing supply on a 1:1 basis, plus 163 bedspaces in cluster flats which count towards the housing supply on a 1:2.4 basis and therefore



	equate to 68 homes. The proposed scheme equates to 202 homes in total. Whilst this is technically accurate, no evidence has been provided to justify the inclusion of student accommodation in the five-year housing land supply. It is therefore requested that 202 units are removed.
Heavitree Road Police Station 5 year supply trajectory	Application 25/0676/FUL has a resolution to grant planning permission, subject to a S106 that has not been signed, from committee in December 2025. It is a Category B site and should be excluded in its entirety from the 5-year trajectory. The application comprises 399 PBSA units and 414 co-living units totalling 813 units, all of which are included within the 2028/29 5-year period. The officer's committee report (page 47 – extracts at Appendix 1) states that when applying the relevant ratio's that the scheme provides an equivalent of 384 dwellings. This equates to 166.25 dwellings using the 2.4 ratio against the PBSA and 217.89 dwellings using the 1.9 ratio against the co-living. Even if the development was a Category A development PBSA should not be counted, leaving a residual 218 dwellings (a deduction of 595 dwellings). As permission has not yet been granted, all 813 units should be removed from the trajectory.

Conclusion and Summary

As stated in our main Matter 5 Hearing Statement, the inclusion of PBSA within the trajectory is contested. There is no evidence provided by the Council that permissions for PBSA would release HMO's to the general housing stock. To the contrary, there is still a proven unmet need for PBSA. The sites that we have identified as PBSA in the above review comprise 1,483 dwellings in the trajectory that should all be removed. The total number may be more than this as we have not reviewed the smaller sites in such detail.

There are a number of sites within the 'permissions' trajectory that do not have any planning permission and should be excluded. Some sites appear to have lapsed or are stalled. There are instances where the Council has not applied the correct ratio to co-living to reflect an adjusted dwelling figure.

The total deduction amounts to 2,657 dwellings, of which 2,617 dwellings are within the 5-year trajectory, as summarised in the table below.

Permissions	
5YS	
Hill Barton Farm	274
The Harlequin Centre	332
Hurst Almshouses	19
Retreat Drive, Topsham	10
231 High Street	16
Land at Summerland Street	69
The King Billy	108
West Park	538



Apparelmaster	236
Sub-total	1602
Permissions	
Post 2021/32 Trajectory	
102-104 Fore Street	13
130 Fore Street	3
Bricknells Bungalow	24
Sub-total	40
Allocations Trajectory	
5YS	
East Gate Clarendon House	202
Heavitree Road Police Station	813
Sub-total	1015
Total deduction	2657