

Issue 1 – Housing Allocations and Windfall – Policy H2

Q2 How were different sites considered for inclusion as residential allocations? What process did the Council follow in deciding which sites to allocate?

1. As stated in our response to Question 1, Issue 1, Matter 4: options for sites to be considered for inclusion as 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 allocation. 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? How were issues such as flood risk considered?

2. As stated in our response to Question 1, Issue 1, Matter 4: While the site selection process was broadly robust, in so far as site options were assessed against the defined sustainability criteria, it is not considered that the final decisions to allocate or not allocate certain sites were entirely robust. In the case of West Gate, despite a high score in a number of the sustainability criteria, this was not taken forward as an allocation. Appendix E of the Sustainability Criteria states that the site has been 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. 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. Per our previous comments, 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 site 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 West Gate area in full. The existing Exbridge House building, 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.
5. 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. Indeed, the evidence base of the local plan includes an Emergency Access and Egress Route Plan for the Exe Bridges element of West Gate which is proposed to be retained. This is also within Flood Zone 3, and its continued inclusion in the plan proves that subject to safe access and egress such sites can be made safe. The plan should take a consistent approach to flood risk and reallocate the remainder of the West Gate area.
6. On the basis of the above, we would strongly recommend that the entire West Gate area should be reinstated, or at an absolute minimum the Exbridge House site 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.

Q8 What is the justification for the suggested modifications to the supporting text to Policy H2? Why are they necessary for soundness?

7. Given the large number of amendments being suggested to remove site allocations, we would again strongly recommend the West Gate allocation be reinstated, or failing this the Exbridge House site be included as a stand-alone allocation.