

# Exeter Local Plan: Examination in Public

## Hearing Statement – Matter 3 (Spatial Strategy and Distribution of Development)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



### Issue 1 – Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2

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

1. Overall, TT Group support the strategic approach of focusing development on brownfield land in order to make the most efficient use of land. This approach is justified through the Sustainability Appraisal, which finds that focusing on brownfield land maximises positive effects and minimises negative effects in relation to the 14 strategic objectives of the Local Plan.
2. TT Group strongly support the focus on providing *“good quality homes of a variety of types in the city to meet Exeter’s various needs”* and developing brownfield sites that are *“in locations close to the city centre to support its ongoing vitality”*. It is critical that the Local Plan provide for a wide range of deliverable and developable sites across the city, and maximise the use of sustainably located sites in and around the city centre.
3. However, Policies S1 and S2 cannot be considered to be entirely effective in realising this strategic approach due to the omission of the previously included ‘West Gate’ (including the Exbridge House site). West Gate is a highly area in a central location capable of delivering upwards of the 617 dwelling capacity quoted in the Liveable Exeter Vision which has informed the emerging plan.
4. In omitting the previously included West Gate, the draft plan undermines the effectiveness of Policies S1 and S2 in realising the strategic approach of focusing development on brownfield land. We consider changes are required and that there is a clear need to reinstate West Gate. At an absolute minimum the Exbridge House site should be included as a specific allocation as outlined in previous representations, most notably its potential to deliver a significant quantum of residential development on a sustainable brownfield site in the city. 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.

#### **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?**

5. The distribution of growth is broadly consistent with the former paragraph 109 (now paragraph 110) of the Framework, as the proposed allocated sites generally score positively against the Services, Facilities and Education and Sustainable Travel criteria of the Sustainability Appraisal. However, as noted above, the omission of West Gate, which scores very highly on both of these criteria, fundamentally undermines the effectiveness of Policies S1 and S2 in aligning with paragraph 110 of the framework.
6. The previously included West Gate is within walking distance of the city centre, offering a wide range of key services and facilities, as well as a number of bus services and the Exeter St Thomas train Station. It is therefore a highly sustainable location which limits the need for wider travel while providing access to sustainable transport options when needed.

**Q6 What process did the Council follow to determine the distribution of this new development? Was this process robust and based on reasonable judgements about where to direct new development?**

7. The evidence and process for determining the distribution of new development is broadly robust and based on reasonable judgements, in so far as it assessed different options against sustainability criteria as set out in the SEA Regulations. However, as noted, despite a broadly favourable assessment in the Sustainability Appraisal, the previously included West Gate has not been taken forward in the draft Plan. In our view this does not represent a reasonable judgement and therefore we encourage the Council to reinstate West Gate into the plan.

**Q9 Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?**

8. The overall distribution of growth is informed by the outcomes of the SA, which demonstrates that three reasonable alternatives (focus on developing greenfield sites, dispersal on smaller sites, and focus on public transport hubs) do not score as highly against the sustainability criteria as the focus on large, strategic brownfield sites.

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9. As stated, our contention is not that the overall distribution of growth is flawed, given that only planning for the minimum requirement (below standard method) and the specific omission of 'West Gate' does not align with the overall growth strategy.

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

10. See response to Question 5 above.

**Q13 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?**

11. No, there are no suggested modifications in the Schedule of Suggested Modifications related to this issue that are necessary for soundness.