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Exeter City Council

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10 February 2026

Ref.: Optional Hearing Statement – H15, Matter 7 Issue 7 Q2, Q4

The examiners' questions in this section open up new aspects which we find are not covered sufficiently in Policy H15 in the Regulation 19 version. More recent planning applications highlight some of these aspects further.

Q2: As the space for housing development in Exeter is very limited, achieving higher densities on former brownfield sites seems to be a necessity. Because of the limited footprint of some of these sites, e.g. Haven Banks and Clarendon House, this results in taller buildings. As the 'Exeter Density Study' recommends minimum densities locally, it leaves the heights of buildings unspecified. The 'Exeter Skyline Study' only covers a selection of tall buildings and views within the city, excluding all modern buildings. It speaks of protecting and enhancing views, but does not cover any function of a 'tall buildings policy', as for example provided in Historic England's 'Advice Note 4: Tall Buildings', which supports the application of Historic England's 'Good Practice Advice Note 3: The Setting of Heritage Assets' on setting and views. Among the factors to be considered to determine the impacts a tall building could have upon the historic environment (listed on p.8) *Quality of Places, Heritage, Visual and Cumulative* implications are of specific importance.

As the above-mentioned recent building applications demonstrated the conflict between established residencies and the new blocks, this leads to delays in the planning process and establishes a negative sentiment in the local community, despite efforts of pre-application consultations, especially where substantial differences in building heights occur. HE's 'Advice Note 4' states that local circumstance requires local authorities to define what 'tall' means, based on evidence of the local context (p.9). There is currently no document in place which would guide here. So 'Local context' in H15 needs to be defined further or a specified and referenced document needs to be put into place.

Q4: Yes, the EP is over-reliant on the provision of flatted accommodation, but with good reason. The space restrictions in where development potential can be found in Exeter make it necessary to move away from detached homes on green field sites. Flatted accommodation, which is more typical of other parts of Europe, needs to be

established in a relatively small city in rural surroundings. This will necessitate social adaptation of the population, so mixed developments will be even more important to improve social cohesion. This could be made clearer in Para 6.81 and 6.82.

Kind regards,



Chair, Strategic Planning & Highways Group