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Exeter Local Plan Examination

Matters and Questions
Response

Matter 9 – Site
Allocations

APRIL 2026

Q240216

1 Introduction

Scope & Purpose

- 1.1 We are instructed by our client, NT Properties Nominees 1A Ltd and NT Nominees 1B Ltd (c/o Legal & General Investment Management ('LGIM')) to submit the enclosed Statement to Matter 9 on the Examination of the Exeter Local Plan. This is submitted ahead of the hearing sessions that are due to commence on 12th May 2026.

Background

- 1.2 LGIM is a key stakeholder in the City being the freehold owner of Exe Bridges Retail Park ('EBRP'), which forms part of the wider defined St Thomas District Centre, and is the subject of a draft allocation (SBA4) in the emerging Local Plan (**CSD-01**).
- 1.3 EBRP provides an important established retail destination for residents in an accessible location and is fully let, and acts as an anchor for the District Centre. LGIM is continuing to look to maintain and improve the vitality and viability of EBRP. This includes ensuring that it continues to provide an important anchor for St Thomas District Centre by providing retail choice, alongside providing a significant source of local employment. It is also recognised that EBRP does have the potential, in the longer term (10-15 years), to deliver wider mixed-use redevelopment.
- 1.4 Representations were submitted on behalf of LGIM to the Regulation 19 version of The Exeter Local Plan 2021-2041 in January 2025 (under representor reference C-30-16-SBA4). These representations have been acknowledged by Exeter City Council ('ECC') in the Schedule of Suggested Modifications (dated September 2025) (**CSD-03**) that have been published as part of the ongoing Examination of the Local Plan. These proposed changes incorporate some of the specific matters raised by our previous representations and are welcomed and supported. However, to assist in the Inspector's examination of the new Local Plan further comments have been provided. This includes providing a direct response to the Matters, Issues and Questions (MIQs) raised by the Inspector as part of the ongoing Draft Local Plan review process (**INS-06**) relating to the proposed allocation at EBRP.
- 1.5 Representations can be made until 24th April 2026 in respect of draft allocation SBA4, and this document has been submitted within those timescales. We therefore trust that this statement (which should be read alongside our previous representations) will be considered in the ongoing examination of the emerging Local Plan.

2 Matter 9, Issue 2 – Strategic Mixed Use Brownfield Allocations SBA1, SBA2, SBA3, SBA4 and SBA5

Generic Questions

Q1. Would the development of the Strategic Mixed Use Brownfield Allocations result in the loss of employment land? If not, how would this be ensured? Are the policies effective in this regard?

- 2.1 Response: The development of the Strategic Mixed Use Brownfield Allocation at EBRP (under draft allocation SBA4) will not result in the loss of employment land. The site currently forms part of an allocated District Centre and whilst the retail development generates significant employment, it is not classified as employment land.

Q2. What is the latest position regarding approvals and construction timeframes for each of the sites?

- 2.2 Response: EBRP is currently fully let, with the longest lease not expiring until August 2031, with existing representation from Next, M&S, Boots and TK Maxx.
- 2.3 Given the existing position, together with the important retail anchor role of EBRP for the wider designated St Thomas District Centre, no proposals have yet been advanced to redevelop the site. This includes any pre-application discussions with ECC.
- 2.4 The active use of EBRP is recognised in the Suggested Modifications put forward by ECC (**CSD-03**). This includes by referring to EBRP as now having the “*potential*” to deliver new homes that in “*the latter stages of the plan period*” (Suggested Main Modification Reference SMM97).
- 2.5 These changes reflect (in part) our representations submitted in January 2025 and recognise the importance of retaining the existing retail function of the site and provide a more realistic framework for the potential development of EBRP over the long-term. This is confirmed by the additional wording added under the Suggested Modifications.
- 2.6 These additions / changes are important; we are supportive of the proposed changes being advanced by ECC. However, for the reasons outlined elsewhere in this Statement, and our earlier representations, the proposed modifications **need to go further** to fully reflect the existing position and the flexibility required in respect of the potential delivery of draft allocation SBA4.

Q3. Is it clear to decision-makers, developers and local communities what will be provided and where across each of the sites?

- 2.7 Response: In respect to draft allocation SBA4, the proposed wording (as amended under the Suggested Modifications (**CSD-03**)) is clearer in now acknowledging that EBRP has the “potential” for the redevelopment and deliver new homes.
- 2.8 The suggested modification also recognises that retail uses should be retained given the site’s location within the defined St Thomas District Centre (Suggested Main Modification Reference SMM97).
- 2.9 Given the active use of the site, sufficient clarity is provided for draft allocation SBA4 – as amended by the Suggested Modifications.
- 2.10 However, the proposed changes to the allocation wording needs to go further, as set out in our previous representations. This includes not being so prescriptive with what is required as part of any future potential allocation, particularly given the flexibility required for this specific need due to the need to retain the existing retail use. However, as currently drafted, the proposed allocation continues to set criteria that “will” be required as part of any future development of EBRP. The provision of such detailed requirements for the site, which under the proposed wording will have to be delivered as part of a future scheme, represents a very prescriptive approach to a potential development that will not come forward until the latter end of the plan period.
- 2.11 This approach allows for limited flexibility and fails to fully acknowledge the site-specific characteristics of EBRP – an established retail destination within a defined district centre where there is a recognised need to retain “significant retail provision”¹
- 2.12 Against this background, whilst some of the recommended changes outlined in our previous representations have been incorporated within the Suggested Modifications, we strongly maintain that the following revised wording to the proposed allocation be provided (text to be deleted and new text in bold and underlined):

“Regard should be given to the following ~~will be required~~ as part of any future redevelopment opportunity that may come forward on the Site:

....”

- 2.13 It is accepted by ECC that if development is to come forward at EBRP this will be at the latter stages of the Local Plan period. It is therefore important that greater flexibility is provided rather than being so prescriptive. The suggested amendments will allow for this flexibility should redevelopment proposals come forward at EBRP.
- 2.14 In addition, as set out in the previous representations, we maintain that additional text should be provided within the draft policy to ensure that potential future long-term redevelopment of EBRP does not impact on the site’s existing and future retail use.

¹ Paragraph 16.25 of Draft Local Plan

- 2.15 In this respect, we maintain that the following additional text should be included under draft allocation SBA4:

“The potential for future redevelopment of EBRP for mixed use development should not impact on the site’s continued retail function, or the potential for that retail function to be enhanced in the short, medium or long term. The longer-term redevelopment potential of the site should not therefore prejudice the continued operation of the site as a designated District Centre.”

- 2.16 Such an approach will maintain the important retail function of EBRP, which is recognised by ECC, but will not prejudice the long-term development potential of the site.

Q4. How have the Exeter Skyline and Exeter Density Studies been considered in formulating Policies SBA1 to SBA5?

- 2.17 Response: No comment.

Q5. It is realistic to expect self-build and custom-build homes to come forward at the densities proposed on each of the sites?

- 2.18 Response: Draft allocation SBA4 requires serviced plots for custom and self-build homes to be provided in line with draft Policy H7, which requires 5% of homes on development of proposals of 20 or more homes should be made available as serviced plots for sale to custom or self-builders.

- 2.19 Whilst it is accepted that development proposals should seek to accord with other policies within the Local Plan, the current prescriptive wording of SBA4 means that providing 5% of homes (c. 10 homes) for custom and self build homes as part of the comprehensive redevelopment of EBRP, particularly given the need to retain significant retail floorspace, could be very challenging. Therefore, as outlined above, the wording of draft allocation SBA4 needs to be more flexible, and rather than referring to ‘will’ be required is amended to ‘regard should be given’.

Q6. Are Policies SBA1 to SBA5 sufficiently flexible for them to be effective?

- 2.20 Response: In respect to draft allocation SBA4, the proposed modifications (as set out under Suggested Main Modification Reference SMM97) does provide greater flexibility and are welcomed. However, for the reasons outlined above (and in our previous representations) we maintain that further flexibility be provided in the precise wording so that the requirements are not so prescriptive.

Policy SBA4 – Exe Bridges Retail Park

Q1. According to Policy SBA4 would be at a density of about 112 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

- 2.21 Response: No comment

Q10. What sort of retail is envisaged at this site and how consistent is this with other policies in the plan and the Framework? Is the proposed scale of retail development appropriate and justified? What is the justification for maintaining a continuous retail function on the site?

2.22 Response: Given EBRP's location within the defined St Thomas District Centre it is not necessary or justified to look to control the type of retail that is provided. Both national and local planning policy seeks to focus retail development within established centres, including St Thomas District Centre, and draft Policy RFC2 supports development proposals for retail uses within existing centres. Indeed, the draft allocation does not set out the scale of retail floorspace proposed.

2.23 As such it is entirely justified to retain the existing retail function of the site – as proposed.

2.24 In considering this specific matter, we also welcome the Suggested Modification (Suggested Main Modification Reference SMM56) that now includes additional text that supports larger scale convenience retail, alongside comparison retail development at EBRP. This proposed change is fully supported and reflects EBRP's 'town centre' location and important retail function as an anchor to the District Centre.

2.25 Against this background, there is clear justification for maintaining the continuous retail function of the site.

Q2. What effect will the allocation have on the character of the area, having particular regard to the setting of heritage assets?

2.26 Response: No comment

Q3. Is it sufficiently clear what is expected of application for planning permission in respect of additional infrastructure requirements?

2.27 Response: Yes, but we believe that greater flexibility should be provided within the policy wording – as outlined above.

Q4. Are the requirements set out in Policy SBA4 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

2.28 Response: Yes, but again for the reasons outlined the precise wording needs to be less prescriptive.

Q5. What is the justification for the site not being developed until the second half of the Plan period, beyond 2030?

2.29 Response: As accepted by ECC, EBRP provides an important established retail destination for residents in an accessible location. LGIM is continuing to look to maintain and improve the vitality and viability of EBRP and ensure that it continues to provide an important anchor for St Thomas District Centre by providing retail choice, and a significant source of local employment.

2.30 EBRP is fully let, with the longest lease not expiring until August 2031. In addition, to date no planning application has yet been submitted or any scheme been discussed for the comprehensive redevelopment of EBRP. Given this, it is entirely reasonable to assume that the site, if it is to be brought forward for development, will be delivered in the second half of the Plan period.

Q6. What is the justification for the suggested modifications to the Policy SBA4 and its supporting text? Why are they necessary for soundness?

- 2.31 Response: the Suggested Modifications are supported and required and necessary to reflect the importance of retaining the existing retail function and acknowledging that it is not certain that the site will be developed for residential uses given the active use and its 'town centre' location.
- 2.32 The proposed changes assist in ensuring that Policy SBA4 is effective, justified and consistent with national policy. It is essential that there the policy framework in place recognises the important role EBRP plays as part of a district centre function, and is maintained and enhanced over the plan period, whether redeveloped or not.
- 2.33 It is imperative that the emerging policy framework does not undermine LGIM's ability to agree new leases or undertake wider asset management initiatives whilst also fostering greater redevelopment potential in the medium to long term, subject to market demand. The Suggested Modifications help to achieve this, but for reasons set out above, these need to go further so these are not so prescriptive and do allow for sufficient flexibility given the site characteristics of EBRP as a 'town centre' location where retail should be retained and enhanced – as supported by other policies within the emerging Local Plan. The suggested changes outlined above and in our previous representations provide this flexibility and will ensure the Local Plan is effective, justified and consistent with national policy.