

Issue 3 – Sustainability Appraisal

- Q1 Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:**
- a) Its assessment of the likely effects of the plan's policies and allocations?**
 - b) Its consideration of reasonable alternatives, including the alternative spatial strategy options and why they were discounted?**
1. With specific reference to the now discounted allocation of the 'West Gate' neighbourhood, TT Group are concerned about the way in which the assessment of reasonable alternatives has then informed the draft Plan.
 2. The West Gate neighbourhood was previously included as a draft allocation for mixed use development including at least 200 dwellings. Indeed, within the Liveable Exeter Vision, the site was identified as an area suitable for around 617 homes. While an element of the previous West Gate allocation is retained in the form of the 'Exe Bridges' allocation, the area to the north of the Exe, including Exbridge House, has been removed.
 3. TT Group have several concerns about the way that West Gate was assessed against the objectives of the Sustainability Appraisal. Against SA Objective 2 (To provide a suitable supply of high quality housing including an appropriate mix of types and tenures), West Gate is given an 'uncertain significant positive' rating as it is unknown how much of the West Gate area would be used for residential development. As set out in previous representations on behalf of TT Group, the site capacity should be considered an unambiguous significant positive effect within the context of the new National Planning Policy Framework requirements to "significantly" boost the supply of homes (Paragraph 61).
 4. Secondly, against SA Objective 4 (Improve the physical and mental health and wellbeing of residents and reduce health inequalities), West Gate is given a significant positive/uncertain significant negative rating. The uncertain significant negative rating is linked to the presence of an existing open space within West Gate. It should be noted that the open space is to the south of the Exe, and therefore if taken as a standalone allocation the Exbridge House site would unambiguously have a significant positive impact when judged

against SA Objective 4. Exbridge House has been separately assessed through the Sustainability Appraisal, and is indeed found to have a positive effect when judged against Objective 4. Therefore, if the Council are not minded to reallocate the entire West Gate site, they should as a minimum include Exbridge House as a specific allocation.

5. Thirdly, against SA Objective 5 (Promote high quality design in new development and improve the character of the built environment), West Gate is given a negligible rating. The current buildings on across the former allocation have no architectural merit, and development of the site will provide an opportunity to greatly improve the character of the built environment. At minimum, this should be considered an uncertain positive impact. It is noted that the assessment states “effects will depend largely on the detailed proposals for sites”, which is not a rubric which is evenly applied throughout the objectives.
6. Fourthly, against SA Objective 9 (To protect residential amenity by reducing air, noise and light pollution), both West Gate and the separate Exbridge House sites are given significant negative/negligible impacts due to being within 100m of the Exeter Air Quality Management Area. We consider this to be an inappropriately inflexible assessment as, per the statement in Objective 5, the effects will depend largely on the detailed proposals for the site. Thus, any negative impact is inherently uncertain.
7. Finally, against SA Objective 12 (To conserve and enhance the historic environment including the setting of heritage assets), both sites are given a minor negative score as they are identified within the council’s Heritage Impact Assessment as amber/yellow. Again, this is based on a major presupposition about the nature of the development on site, and should at minimum be reduced to an uncertain impact. In fact, due to the low architectural character of the existing building on the Exbridge House site, we consider there to be potential for a positive impact against this objective through the high quality redevelopment of the site.
8. The sites are also given uncertain negative/negligible impacts against SA Objectives 10 (To conserve and enhance biodiversity and geodiversity), 11 (To conserve and enhance the character and distinctiveness of the landscape) and 13 (To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources. The site is capable of being sensitively designed to significantly reduce and

where necessary mitigate these potential impacts, and this should be taken into consideration when weighing up alternative allocations.

9. Overall, we do not consider that the Sustainability Appraisal has appropriately considered the merits of the West Gate neighbourhood, nor the merits of the Exbridge House site specifically. We maintain that the West Gate neighbourhood should be reinstated, or failing this, the Exbridge House site should be specifically allocated, in line with our previous representations. 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.

Q2 How were the strategic policy options A-D determined? Are there any other reasonable strategic policy options that should have been tested by the Council through the SA, and if so, why?

10. TT Group are broadly supportive of strategic policy Option A, which focuses development on large, strategic brownfield sites. However, we remain concerned that the Council are not adequately 'planning positively' for future need by not exploring opportunities to go beyond the minimum requirement for housing delivery. It is acknowledged that the proposed housing requirement of 13,975 homes for the plan period (642 homes per year) is within 80% of the new local housing need set out within the standard method published alongside the NPPF in December 2024. The proposed requirement is therefore in accordance with the transitional arrangements set out in paragraph 234 of the NPPF. However, 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, we strongly encourage the Council to go beyond the minimum and plan positively by exploring opportunities to meet the standard method figure of 800 homes per year.

11. The Sustainability Appraisal states that:

"No reasonable alternative options for the amount of development have been considered in the SA as the Council is proposing an evidenced-based [sic] quantum of growth and does not consider that there are reason alternative options for higher and lower quanta."

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 1 (Legal Compliance)

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



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12. TT Group do not consider this to be a reasonable or evidenced conclusion, consider that there are sites which had previously been draft allocated such as West Gate that are capable of accommodating additional dwellings, but have been removed from the plan on the basis of erroneous evaluation against the sustainability objectives. The Sustainability Appraisal also states that the *“housing requirement should be based on the standard method unless exceptional circumstances justify an alternative approach”*. There does not appear to be any justification for why an alternative approach is justified and it is rather taken as an assumption that the standard method figure does not apply.
13. The revised Sustainability Appraisal should have explored a higher quantum strategic policy option which included sites like West Gate, and we would strongly recommend that the Council rectify this as part of the plan.

Q5 How were suitable and potentially suitable housing sites determined for the purposes of the SA? What type of sites were discounted as part of this process?

14. Please see response to Question 1 above.
15. **Q6 Is the SA based on a robust and up-to-date assessment of housing, mixed-use and employment sites? Were adequate reasonable alternative options considered and were they tested on a consistent basis?**
16. Please see response to Question 1 above.