



The Exeter Plan Publication Plan: Regulation 19 December 2024 (dLP)

Stuart Partners Ltd

Matter 7 - Meeting Housing Needs

- **Issue 1 – Affordable Housing – Policy H4**
 - **Issue 2 – Rental, communal and Purpose-Built Accommodation – Policies H5, H6, H9, H10 and H12**
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Introduction

CarneySweeney acts for Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon District. This land is situated within what is known as the “West End” of East Devon and is being promoted by our client for a sustainable residential-led mixed use development comprising up to 2,000 new market and affordable homes and a range of social, community and commercial uses. The West End is situated on Exeter City Council’s (ECC) eastern edge and is recognised by East Devon District Council (EDDC) in its Second Regulation 19 draft Local Plan as being a highly sustainable area and a focus for new development.

This Statement should be read in conjunction with our Statements on Matters 1, 2, 3, 4, and 5.

Issue 1 – Affordable Housing – Policy H4

Shortfall in Affordable Housing delivery Against the Adopted Development Plan

The context for consideration of affordable housing need and delivery in the city is the deficit in delivery during the last plan period of at least 1,000 affordable dwellings.

Housing/Affordable Housing Need

Exeter Local Housing Need Assessment: Report of Findings December 2024 (EVB-H-01a) identifies a Local Housing Need over the 20 year plan period of 12,840 homes at 642 per annum (Figure 4).

Figure 2 identifies an overall affordable housing need of 16,092 homes over the plan period or about 805 homes per annum, taking account of current unmet need and future need.

Against this identified need, 01a seeks to remove households that amongst other things it estimates have sufficient income and savings to purchase an open market property.

As a result, EVB-H-01a sets out at Figure 5 (reproduced below) a need for 4,155 affordable homes (207 per annum), some 11,937 (597) short of the total assessed need. It also estimates a need for 8,685 market homes (434 per annum). These combine to represent the overall local housing need figure of 12,840.

Figure 5 identifies total open market housing need (8,409) against bedroom numbers. The need for market housing with 3 or more bedrooms is 5,459 or 65% of the total need.

Figure 5 also identifies affordable housing need in terms of bedroom numbers against ECC’s need figure of 4,155 affordable homes. The need for affordable housing with 3 or more bedrooms is 2,572 homes or 38% of the total need, whatever the actual need figure is – 6,115 homes against the total need or 1,572 homes against ECC’s assessed need.



Figure 5: From Figure 48: Overall need for Market and Affordable Dwellings (including affordable home ownership products) by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

	Affordable Housing Need: Households only able to afford Social Rents	Affordable Housing Need: Households able to afford Affordable Rents	Unable to afford market ownership and Unable to afford 70% First Homes	Unable to afford market ownership but able to afford 70% First Homes	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	437	95	374	200	1,106	901	2,007
2 bedrooms	359	130	516	272	1,277	2,049	3,326
3 bedrooms	538	215	364	219	1,336	4,549	5,884
4+ bedrooms	210	121	67	38	436	910	1,346
DWELLINGS	1,544	562	1,320	728	4,155	8,409	12,563
C2 Dwellings	-	-	-	-	-	277	277
LHN	1,544	562	1,320	728	4,155	8,685	12,840

Will Affordable Housing Need be Met?

There are two current examples of schemes on allocated strategic brownfield land that even if they are built out (which is far from certain) do not provide any affordable housing on site. These are:

Water Lane (23/1007/OUT) will deliver 0% affordable housing out of 1,140 new homes. As noted in our Statement on Matter 3, there are significant challenges to the delivery of Water Lane in any event.

Harlequins Shopping Centre (21/1104/FUL) has been vacant since September 2019. Planning permission was granted on 24.01.22 for co-living accommodation. Condition 1 requires commencement within three years ie by 24.01.25. An amendment to the S106 Agreement has been submitted (24/0911/MDO) seeking approval to pay a financial contribution in lieu of on-site affordable housing. A decision is pending. There is no confirmed start or delivery date.

In addition, the co-living scheme at *Haven Retail Park* that benefits from a resolution to grant consent in December 2023 has been mothballed and there is no evidence that it will ever come forward.

As noted above, the need for 3 or more bedroom affordable homes is around 38% of the total affordable housing need. The available evidence casts significant doubt on the ability of those strategic brownfield sites allocated in the dLP to deliver 15% affordable homes on site. Even if they can, the accommodation is likely to be in apartment format, rather than family homes, meaning that a significant proportion of identified need for family homes will not be met through strategic brownfield land allocations.

This would be contrary to NPPF paragraphs 60 and 63, which require that the needs of groups with specific requirements are met and that policies provide a mixture of housing types (size, type and tenure) for the local community.

Affordable Housing Delivery

Brownfield Development in Exeter (EVB-H-24) refers to the city's success in regenerating brownfield land.

However, there is no assessment of likely affordable housing delivery for each allocated site and a total secured through the dLP allocations, to demonstrate that any affordable housing need can be met. In any event, the strategic brownfield regeneration schemes are focussed on apartments, co-living and PBSA and this makes them unlikely to deliver sufficient family homes to meet the need.

Affordable Housing Trajectory

By the same token, neither the Exeter Plan Housing Trajectory (EVB-H-03) nor the Exeter Plan Delivery Schedule (EVB-H-06) include a trajectory of affordable housing delivery.

Conclusion

It is concluded that:

- Strategic brownfield land allocations will fail to deliver anywhere near the level of affordable housing need assessed in the dLP and its evidence (4,155 homes) let alone 16,092 homes.
- Strategic brownfield land allocations will fail to meet the need for those in affordable housing need for 3 or more bedroom homes, which equates to 38% of the total assessed need.
- No evidence is presented demonstrating total affordable housing delivery from allocated sites.
- No evidence is presented of a delivery trajectory for affordable housing throughout the dLP period.

From the above, it is considered that the city cannot meet its affordable housing need, be it on brownfield or greenfield land allocations. In order to get even close to meeting its needs, ECC should have approached EDDC under the DtC to explore the opportunities for this need to be met on a sustainable site or sites in East Devon's West End.

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