

HBF response to Exeter Local Plan Examination MIQs- Matter 15 – Monitoring and Implementation

HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Issue 1 – Monitoring and Implementation

Q1. Will the Council's monitoring and review processes for the Plan be effective in assessing the success or failure of delivery and what alternatives might reasonably be provided if necessary?

HBF have made comments in our Regulation 19 response and at the EIP Hearing Sessions elsewhere about the need for effective monitoring of the Exeter Plan. We suggest that a full comprehensive review and expansion of all the monitoring indicators included in Chapter 17 is needed.

The scope and content of the monitoring indicators will need to be updated to reflect any proposed Main Modifications that are being taken forward, and any other changes needed for the Plan to be sound. The indicators need to be more specific and clearer and include timeframes. For example, is the % of brownfield/greenfield split of homes required to be higher in every single year, or over the plan period. Brownfield sites are known to be more challenging to deliver so if greenfield sites are coming forward earlier in the Plan period and brownfield is not, more information than just the brownfield/greenfield split will be needed to establish if the policy is working or not, and if any actions are needed to address the issue.

Simply having an indicator and target and a delivery mechanism is not enough. The purpose of monitoring is not merely to note there is, or may be, an issue with a policy. If monitoring identified an issue, something should then be done about it. If, for example, housing monitoring shows an under-delivery of housing, what is the Council going to do to help bring more housing forward? Similarly, if or every single housing scheme was submitted with a site-specific viability appraisal this would indicate the combination of contributions being sought are too high. What would happen then? Therefore, we suggest an additional column that answers the ‘so what’ question is needed in order to create a monitoring framework that is effective and in line with national policy.

We also suggest that Chapter 17 could also include a Local Plan review policy, and reference to the changing planning system moving forward.