

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

Stuart Partners Ltd

Matter 2 - Housing, Employment and Retail Need

- **Issue 1 – Local Housing Need and the Housing Requirement – Policy H1**
 - **Issue 2 – Affordable Housing Need**
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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, 3, 4, 5 and 7.

Issue 1 – Local Housing Need and the Housing Requirement – Policy H1

Historic Unmet Need

Evidence indicates that the adopted development plan has failed to meet identified housing need over the last plan period, with a deficit in market housing delivery of at least 1,900 homes and a deficit in affordable housing delivery of at least 1,000 homes.

The PPG advises that it is not a requirement to specifically [our emphasis] address past under delivery (Paragraph: 011 Reference ID: 2a-011-20241212). However, plan making authorities should consider the merits of planning for higher growth. An example is given of where this would seek to reflect economic growth aspirations. (Paragraph: 040 Reference ID: 2a-040-20241212)

In EVB-S-01a, ECC recognises that Exeter is on the up and that Exeter “...is one of the most successful locations for investment in the UK and has an emerging tech industry as well as strengths in environmental and life sciences.” and also that “...an ambitious and joined-up vision combined with a focus on delivery can ensure that growth delivers real benefits for its people and businesses.”

Economic growth is only given as an example. It may still be appropriate for a local plan to address past under-delivery in its overall need assessment where, for example, the deficit is significant and also where there is considerable doubt over the dLP’s ability to meet its assessed housing requirement arising from the challenges of delivering strategic brownfield land allocations. In addition an economic justification, both these scenarios apply here.

Issue 2 – Affordable Housing Need

Based on the above and evidence presented in our other Hearing Statements, it is considered that the overall housing requirement should be increased materially to drive a proportionate increase in affordable housing delivery, even if this necessitates cooperation with EDDC in helping to meet this requirement outside the city.

Conclusion

Issue 1 Local Housing Need and the Housing Requirement

5. It is considered that there is significant unmet need arising from under market and affordable housing delivery in the previous plan period that should be taken into account. (Q3)



6. There are a number of circumstances arising in Exeter that justify increasing the housing requirement to meet actual need. These circumstances include both those identified in the NPPF/PPG and a range of locally specific circumstances. (Q1 and Q2)

Issue 2 Affordable Housing Need

The overall affordable housing need of 805 dwellings per annum should be increased to reflect past under delivery. (Q1)

In order to meet this increased requirement, it will be necessary to make corresponding increase in the total housing requirement.

CSE2153/SC

