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Exeter Plan 2021-2041

Publication Stage (Regulation 19) Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm on 6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title	Councillor
First Name	Diana
Last Name	Moore
Job Title (where relevant)	Leader of Green Group. Submission on behalf of Cllrs Banyard, Read, Rees, Bennet, Wetenhall, Ketchin.
Organisation (where relevant)	Exeter City Council
Address Line 1	% Civic Centre
Line 2	Paris St
Line 3	Exeter



Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.

(Continue on a separate sheet if necessary)

The proposed policies H4, H5 & H6 taken together will **are not sound and will fail to be effective:**

- The position in the preamble *“Overall, it is likely that Policy H4 will deliver approximately 20% of homes as affordable,”* makes it clear that the policy will fail to deliver the quantum of affordable homes to meet the level of local housing needs as identified in the LHNA,
- achieve the H4 strategic objective of *“Provide[ing] the quantity, type, quality and affordability of homes that Exeter needs in the right locations.”*
- Nor does it demonstrate the number and split provided in the evidence of sites assessed in HEELA which can deliver affordable housing in the numbers and proportion required to meet the affordable housing need set out in the LHNA.
- The policy does not the Council will ‘help to deliver’ as stated in 6.23 in order to achieve 6.14 *In meeting the housing requirement, it is important that we help to deliver the variety of homes that our communities need.*
- The policy does not have clear targets for the quantum of affordable homes delivered by virtue of other mechanisms set out in 6.23 to demonstrate if the approach in 6.23 is effective meeting local needs the need for affordable housing as set out in the LHNA.

In addition, taken together the LHNA and the Viability assessment does not justify the low proportion of affordable housing on brownfield sites.

To meet the projected housing requirement in the LHNA, a substantial increase in total housing delivery is required compared to the previous plan period (see graph below based on monitoring report¹ figures) and it is noted that the projected housing requirement also includes a ‘buffer’ set out in the LHNA housing numbers in policy H1. The LHNA sets out the housing problems in Exeter in terms of demand and affordability.

The LHNA² factors in previous under- delivery of housing into the affordability uplift. [6.28] explains that *“The affordable housing need as calculated fully enumerates the current and future affordable housing*

¹ [Report of Surveys](#)

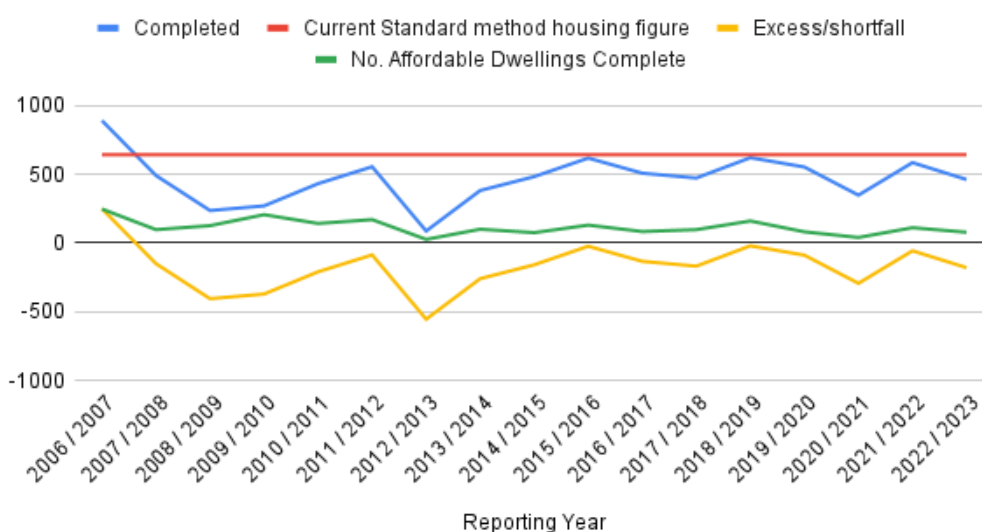
² [Exeter Local Housing Needs Assessment](#)

needs, and the current need component itself encompasses those households impacted by any previous under-delivery of affordable dwellings”.

Over the previous plan period affordable housing delivery achieved almost 27%, some 8% below the policy requirement of 35%. The current LHNA identifies a need of 33%: 67% (rounded) affordable to market homes. To be effective the policies in the plan need to acknowledge the challenges of the previous plan but set out more ambitious targets for affordable housing given the

housing crises facing communities across Exeter. They current policy is putting overarching viability, at this one point in time in an economic cycle, ahead of meeting urgent locally assessed housing need.

Exeter Housing delivery 2006 - 2023



Policy H4

Proportion of affordable housing:

1. Policy H4 adopts an approach with 35% affordable on Greenfield sites and 15% on Brownfield sites. The policy does not set out the expected proportion of Greenfield/Brownfield development will achieve “approximately 20% of homes as affordable,” given that the plan approach is brownfield first and greenfield sites are expected to make a small contribution. The HEELA does not address which are considered Green or Brownfield sites specifically. This is significant since if the vast majority of homes are built on greenfield sites at 35% policy rates then there is more likelihood of achieving the numbers of affordable homes needed. The brownfield first approach (15% affordable) will produce a much lower number of affordable homes overall.
2. Given The HEELA does not address which sites are suitable or being promoted for affordable housing, (which then may be developed for example by contributions arising from policy H6 (Coliving) or other sources of grant) the policy does not effectively show how the approach in 6.23 can be delivered. The Council, for instance, only has a limited supply of its own land on which to build and some housing associations are surrendering land in the city centre, so already resulting in a loss of affordable housing.
3. Moreover, if 20% of homes are delivered as affordable, including social, this policy will not meet the needs set out in the LHNA. There needs to be a balance between the aspirations of

developers and landowners consulted who were engaged in the viability assessment process and the needs of residents in need of homes in Exeter. The planning system must secure maximum benefits in the public interest through the granting of planning permission this policy fails to do that. The viability does not reference the LHNA findings.

The Viability modelling has adopted a too cautious approach to modelling affordable housing proportions for brownfield sites, build to rent and co-living and different potential policy requirements for affordable housing have not been modelled. Nore does the viability assessment model a proposed affordable:market mix based on the LHNA in order to assess the extent to which affordable homes (meeting LHNA) needs can be balanced. Policy requirements, particularly for affordable housing, should: be set at a level that takes account of needs and and fails to demonstrate how it has done so in line with planning policy guidance.³

4. The proportion of affordable (including social): market homes should be reviewed and amended to (better) meet the independently assessed needs in the LHNA (suggesting a 33%: 67% split) and set out the level of expected grants and subsidies and the expected number of homes to be developed through these mechanism in order to meet any gap. The Local Plan viability assessment identifies clear headroom on the strategic brownfield sites, some at higher affordable housing rates:

Table 6.3 VA1 Viability £/dwelling headroom

Description	Values	% AH	Headroom £/dwelling (room)
Flats for sale – small schemes (15-30 dwellings)	Standard	15%	-£1,784 to £86
Flats for sale – small schemes (15-30 dwellings)	Sensitivity	15%	£15,351 to £16,988
Flats for sale – larger schemes (75-150 dwellings)	Standard	15%	£3,872 to £10,610
Flats for sale – larger schemes (75-150 dwellings)	Sensitivity	15%	£21,293 to £28,385
BtR flats – 150-350 dwellings	Standard	20%	£9,445 to £12,226
Higher density mixed houses and flats (15-75 dwellings)	Standard	15%	£71,898 to £80,965
Co-living (40-250 rooms)	Standard	20%	£4,361 to £12,771
PBSA (40-250 rooms)	Standard	20%	£3,902 to £10,834

5. Of course economic viability will change over the economic cycle and lifetime of the plan which is allowed for in 6.20 and the NPPF which recognises viability and also provides for overage in order to secure public benefit if the development is more profitable than expected is welcome.

Deliverability:

1. H4 goes on to say that *“while grants and other subsidies will be used to increase the number of affordable homes delivered.”* The Policy does not say which body will secure those grants and subsidies or who will deliver the housing, and is therefore aspirational and undeliverable.

³ [Viability - GOV.UK](https://www.gov.uk/government/policies/affordable-housing) Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage

2. Exeter City Council's Council housing strategy⁴ to build 500 council homes is referenced, yet this does not cover the whole plan period as this strategy ends in 2030 and will not in itself meet the needs of the number of people in need of social housing. It is noted social housing is differentiated in the LHNA and is emphasised as a very important source of truly affordable housing, and is identified as a priority in the Devon Housing Commission Report⁵ to meet local housing need.
3. 6.22 in the H4 policy preamble says "*Should the affordability restriction on an affordable home be lifted, the subsidy will be recycled to provide new affordable housing in Exeter as approved by the City Council.*" Lifting the restrictions on affordable homes will remove the affordable homes from the provision and not be available to meet need over the lifetime of the plan. There is no assessment of the likely impact on this policy on the number and type of homes which might be impacted by this policy. All affordable homes should be required to remain affordable in perpetuity, exceptions notwithstanding, noting that there are mechanisms to ensure affordable purchase can remain affordable.

Meeting the needs of people with a disability and aging population

1. 6.22 also identifies that at least "*10% of the affordable homes will be expected to meet wheelchair user accessibility standards as required by Policy H14.*" However, the LHNA identifies a greater need and potentially an "*existing unmet need for M4(2) housing and some may actually be wheelchair users needing M4(3) housing*" i.e. wheelchair accessible homes at 11%, preferably 15% (p86 & 7.78 p 89) LHNA)
2. The policies will not be effective in delivering in a way which meets this current and forecast need for people with disabilities or an ageing population. The Devon Housing Commission recommends (*emphasis mine*) that, "as well trying to increase the number of social rented homes delivered, local authorities should also explore ways that the planning system can be used to shape the **type** of housing that is delivered – e.g. in size and price range - so that local need is prioritised over open market demand".

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

To demonstrate why the policy is justified and improve soundness:

Policy H4: The minimum percentage of affordable homes on Greenfield and Brownfield site should be reassessed to better meet the local housing need for affordable housing as identified in the LHNA. Any update to the viability assessment should consider if a lower proportion (than 33%) of affordable housing on brownfield site can be realistically be met via the provision Greenfield site or other mechanism set out in 6.23.

⁴ [Exeter Council Housing Strategy.pdf](#)

⁵ [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)

Amend to improve soundness:

6.22 Affordable homes secured under Policy H4 should be delivered without public subsidy and (with the exception of First Homes) be disposed of to a locally operating Registered Provider agreed with the City Council. The affordable homes must be made available to eligible and qualifying households in need of affordable housing in accordance with the City's Council's published criteria or to essential local workers. At least ~~10%~~ **18%** of the affordable homes will be expected to meet wheelchair user accessibility standards as required by Policy H14. **Affordable Homes should remain affordable in perpetuity**, should **in exceptional cases** the affordability restriction on an affordable home be lifted, the subsidy will be recycled to provide new affordable housing in Exeter as approved by the City Council.

Add to H5: Build to rent

"f. the affordable homes shall remain affordable in perpetuity"

to ensure that any changes possible under H5 b *"Are held as build to rent for at least fifteen years under a covenant;"* do not result in a loss of affordable homes.

ADD to Section 17 to demonstrate the effectiveness of the policies

a target, indicator and delivery mechanism to demonstrate the effectiveness of the approach set out in 6.23 and

a target, indicator and delivery mechanism to demonstrate the number of affordable homes delivered to wheelchair accessible standards

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes

No

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.

(Continue on a separate sheet if necessary)

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.

(Continue on a separate sheet if necessary)

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
(Continue on a separate sheet if necessary)

As councillors (some of whom have sat on the planning committee) we have experience of trying to work with planning policy in practice and how planning decisions are taken within the Council.

As ward Councillors we have experience of how planning policy affects the community and local environment and the extent to which it may or may not be effective in achieving the stated policy outcomes. We are also advocates for our communities and have identified where planning policies are not effective in terms of meeting positive planning outcomes for our communities and local environment. This is especially true for the dire impact on the lack of quality affordable and social housing in the city and the ongoing high numbers of homeless people.

The issues we have commented on in these representations are ones which concern us most (having made previous representations). However, it should be noted that, there has been no opportunity for formal Scrutiny (as set out in the Local Government Act) of the local plan policies, despite our numerous formal requests. While the strategic direction was set by the administration and approved

by Council it should be noted that the emerging plan policies have not subject to any formal political oversight, for example in a council strategic planning committee. Our group has objected to the process. We are therefore having to make a number of representations to the Inspector on the matters that will have the most impact on our communities and environment.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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