



HBF response to Exeter Local Plan Examination MIQs- Matter 4 – Site Allocations Process and Methodology

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.

Please note that we have not responded to all the questions only those of relevance to our members, and reflecting the issues in our Reg 19 response that HBF submitted.

Issue 1 – Site Allocation Methodology

Q1. How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

HBF do not comment on specific sites of allocations but we would expect the Plan to set out a strategy that provides for a range and choice in the market and ensures that housing needs are met in full. In line with national planning policy HBF agrees that the Council should seek to allocate brownfield land for development where it is appropriate and deliverable and where it will contribute to the spatial strategy. However, HBF also note that it is imperative for the Council to ensure that they are providing homes to meet all of the local needs across the housing market. We note that this requirement is sufficiently addressed by allocating only, or mostly brownfield land, and we suggest more than a modest greenfield release is required.

Q2. How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield land?

HBF have provided details comments about our concerns around Viability in our Reg19 response and in relation to Matter 14. They are not repeated here other than to request that the policies in the Plan have been subject to robust viability testing, to ask for flexibility within the policies to consider the implications of the cumulative impacts of all the policies in the Plan on viability, and to request that site specific viability can be considered on a case by case basis to enable and allow for where this is needed to address and site-specific issues.

We also note the particular challenges of delivery brownfield land in terms of national BNG policy requirements, especially where Open Mosaic Habitat is present. We have provided more details on our concerns about this matter in our Reg 19 response and in our response to MIQs on Matter 11: Natural Environment.

Q3. How did the Council consider the infrastructure requirements of the growth proposed in the Plan (such as grid capacity and the strategic road network) and how did this inform the site selection process?

The Infrastructure Delivery Plan need to inform the Whole Plan viability assessment.

Q4. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

As we have said earlier in this response HBF do not comment on specific site allocations but we would expect the Plan to set out a strategy that provides for a range and choice in the market and ensures that housing needs are met in full. In order to deliver the housing requirement needed in Exeter, including the amount of affordable housing required. HBF therefore supports additional allocations to ensure housing needs are met, affordable housing is delivered, a range and choice is provided for the market. In particular, we support the allocation of additional small and medium sites to support the SME house building sector.

Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

As mentioned above HBF support additional allocations within the Exeter Local Plan, and increased flexibility with regards to addressing any viability issues. We do not believe the proposed changes to this Chapter address our concerns.