
Strategic Housing Land Availability Assessment

December 2010



Exeter City Council



Devon
County Council



Teignbridge
DISTRICT COUNCIL
South Devon

Working in partnership across the Exeter Housing Market Area

EXECUTIVE SUMMARY

A Strategic Housing Land Availability Assessment (SHLAA) is a key part of a local planning authority's evidence base on housing delivery. It aims to identify sites with potential for housing and assess when they could be developed. The assessment, which is undertaken with the help of an independent Panel, helps a local planning authority prepare the planning documents that are part of the process of delivering sufficient land to provide the housing needed by local communities.

The Exeter 2010 SHLAA presents an analysis of the potential dwelling contribution of sites within Exeter, including sites with and without planning permission for housing, over 1 to 5, 6 to 10 and 11 to 15 year time periods. It includes a trajectory of potential housing supply over the 15 year period. Monitoring will take place through the *Annual Monitoring Report*, which compares the delivery of housing and the five-year supply of deliverable sites with the expected annual levels of housing completions identified in strategic planning policies. This is the second edition of the Exeter SHLAA, updating information from the first edition which was published in August 2009.

The SHLAA does not make judgements on whether sites should be allocated for housing or whether planning permission is likely to be granted. The SHLAA helps to identify the most developable and deliverable sites for housing development. Any housing allocations will be dealt with through the *Site Allocations Development Plan Document*, work on which will commence in 2011.

The results of the Exeter SHLAA show that the *Submission Core Strategy* housing target to deliver 12,000 dwellings between 2006 and 2026 can be achieved through existing completions, the implementation of extant planning permissions, the potential development of deliverable and developable sites identified through the SHLAA process, and the development of four broad locations for growth (Water Lane, the Grecian Quarter, Newcourt and Monkerton / Hill Barton).

The SHLAA also shows that there is a five year supply of deliverable sites, in accordance with national guidance and the terms of National Indicator 159.

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1 INTRODUCTION

What is a SHLAA?

- 1.1 Strategic Housing Land Availability Assessments (SHLAAs) were introduced in national planning guidance and are key components in the process of housing delivery. A SHLAA is a strategic assessment of the housing potential of specific brownfield and greenfield sites. SHLAAs are undertaken in partnership with key stakeholders in the housing field and require regular monitoring and updating.
- 1.2 *Planning Policy Statement 3: Housing (PPS3)*¹ advises (paragraph 54) that local planning authorities (LPAs), drawing on evidence from SHLAAs and other relevant evidence, should:
- identify specific deliverable sites for the first 5 years of a plan that are ready for development and keep this topped up in response to market information; and
 - identify specific developable sites for years 6-10 and ideally years 11-15.
- 1.3 The guidance goes on to say that, where it is not possible to identify specific sites for years 11 onwards of the plan, then broad locations for future growth should be identified.
- 1.4 To add detail to the advice on housing delivery in *PPS3*, the Government published *SHLAA Practice Guidance*² (*CLG Guidance*) in July 2007. The Planning Officers Society developed further guidance on how best to coordinate the preparation of SHLAAs with the Development Plan Document (DPD) preparation process. The guidance was published by the Planning Advisory Service in January 2008 and updated in July 2008 (*PAS Guidance*)³.
- 1.5 As part of the planned provision of housing, SHLAAs should be brought into the process of preparing DPDs. They are an important part of the evidence base and their robustness may be subject to scrutiny during the public examination of the relevant DPD. *CLG Guidance* notes what when the standard methodology is followed there should not be a need for a local planning authority to justify the approach taken in preparing its SHLAA, including at independent examination.
- 1.6 The Exeter SHLAA has been used in the preparation of the *Submission Core Strategy* for Exeter, which sets out the vision, objectives and strategy for the spatial growth of the City up to 2026. It will also be used to inform a *Site Allocations DPD*, on which work is due to commence in early 2011.
- 1.7 The *South West Regional Housing Strategy 2005-2016*⁴ sets out indicative boundaries for 14 sub-regional housing market areas (HMAs) in the region. The HMAs have been translated into the nearest equivalent district authority boundaries for practical purposes. Joint working across the whole of an HMA to assess levels and types of housing is seen as essential. Strategic Housing Market Assessments (SHMAs) provide evidence of the level and type of need in a sub-regional housing market area.
- 1.8 Exeter is in the Exeter HMA, which also includes East Devon, Mid Devon, Dartmoor National Park and Teignbridge local planning areas. A *SHMA*⁵ report for the Exeter HMA was published in 2007 and is currently being updated.

¹ Department of Communities and Local Government (DCLG) (June 2010) *Planning Policy Statement 3 (PPS3): Housing*

² DCLG (July 2007) *Strategic Housing Land Availability Assessments – Practice Guidance*

³ Improvement and Development Agency (I&DeA) & Planning Advisory Service (PAS) (January & July 2008) *Strategic Housing Land Availability Assessment and Development Plan Preparation*

⁴ South West Regional Assembly (2005) *South West Regional Housing Strategy 2005-2016*

⁵ ORS (2007) *Exeter and Torbay Strategic Housing Market Assessment*

Approach and methodology

- 1.9 The LPA partners in the Exeter HMA have formed a steering group who have worked together to develop a SHLAA *Methodology*⁶ and draw up a constitution and terms of reference for a SHLAA Panel. That *Methodology* is firmly based on the advice set out in the *CLG Guidance*.
- 1.10 The *Methodology* and *Panel Constitution and Terms of Reference* were subject to public consultation and then published in September 2008. They were revised in September 2010 to take account of the forthcoming revocation of the Regional Spatial Strategy, amendments to *PPS3* and experiences of preparing SHLAA gained by the LPA partners in the preceding two years. The revised *Methodology* (including the *Panel Constitution and Terms of Reference*) is available on Exeter City Council's website at www.exeter.gov.uk/SHLAA.
- 1.11 Exeter published its first *SHLAA*⁷ in August 2009. That report, along with relevant background information, is available to view on the Council's website at the link above.
- 1.12 *CLG Guidance* advises that SHLAA should be updated regularly as part of the Annual Monitoring Report exercise, to support the updating of the housing trajectory and the five year supply of specific sites.
- 1.13 This report is Exeter's second SHLAA and is, essentially, a review of the first edition. It has been prepared in accordance with the *CLG Guidance*, *Methodology* and in conjunction with the SHLAA Panel of Stakeholders. Further details of what the review has involved are included in this report. The base date for the SHLAA is 1 April 2011.

⁶ Local Authorities of the Exeter HMA (September 2010) *Methodology for SHLAAs: Exeter Housing Market Area*

⁷ Exeter City Council (August 2009) *Exeter 2009 Strategic Housing Land Availability Assessment*

2 THE PURPOSE AND CONTENT OF THE ASSESSMENT

Purpose and minimum requirements of a SHLAA

2.1 The SHLAA serves two primary purposes:

- It identifies suitable sites with potential for housing, assesses that potential and estimates when sites are likely to be developed; and
- It assesses the five year supply of deliverable housing sites for the purpose of National Indicator 159: Supply of ready to develop housing sites⁸.

2.2 The report is a technical study that will be used as part of the evidence base in the process of plan making.

2.3 The *CLG Guidance* sets out the minimum requirements of SHLAAs. They are required to:

- Provide lists of sites, cross-referred to maps showing locations and boundaries of specific sites (or broad locations where necessary);
- Assess the deliverability / developability of each identified site (i.e. in terms of its suitability, achievability and availability) to show when sites could realistically be expected to be developed;
- Assess the potential quantity of housing that could be delivered on each identified site (or within each identified broad location) or on windfall sites (where justified);
- Identify the constraints to delivery on individual sites; and
- Make recommendations on how and when any constraints could be overcome.

Deliverable and developable sites

2.4 *PPS3* provides a definition of **deliverable** sites. At the point of adoption of the local development document, deliverable sites are those that are:

- **available** – at that time
- **suitable** – in a location where development would contribute to a sustainable mixed community
- **achievable** – there is a reasonable prospect that housing will be delivered on the site within five years.

2.5 The SHLAA process includes making an assessment of sites to determine whether they are deliverable within the five year horizon. The SHLAA and the annual review provide the evidence for demonstrating Exeter's five year deliverable housing land supply.

2.6 Looking beyond the five year planning period, there will be sites considered potentially **developable** in the fifteen year planning period. *PPS3* defines developable site as those 'in a suitable location for housing development and there should be reasonable prospect that the site is available for and could be developed at the point envisaged' (paragraph 56).

Monitoring and review

2.7 The SHLAA will be updated on an annual basis, with the updating programmed so that it can inform the *LDF Annual Monitoring Report*, which is published at the end of the calendar year. However, a full resurvey (or 'call for sites') should not be needed every year. Sites that are brought to the attention of the City Council over the course of the year will be assessed, along with a further appraisal of sites formerly discounted, to see if the constraints have changed.

⁸ DCLG (October 2007) *The New Performance Framework for Local Authorities & Local Authority Partnerships: Single Set of National Indicators*

Status of the SHLAA and identified sites

2.8 The following points are made to provide clarity about the status of sites identified within the SHLAA. This helps to avoid confusion and misunderstanding:

- The SHLAA does not pre-empt future plan making or related decisions;
- The SHLAA is not Development Plan policy;
- The SHLAA is not informal Council policy;
- The SHLAA is technical evidence. It is only one piece of evidence in the LDF evidence base.
- The SHLAA does not prejudge the relative merits of sites for development or rank them in order of preference;
- Identified sites may be tested further through the plan making process for DPDs, where judgements will be made about whether sites should be allocated through planning policy. This will include rigorous testing through sustainability appraisal/strategic environmental assessment, habitats regulation assessment; stages of public participation and independent examination;
- Inclusion of a site in the SHLAA does not indicate that planning permission will be granted for new housing;
- Planning applications on sites identified in the SHLAA will be judged on their merits against relevant development plan policies unless material considerations indicate otherwise. The SHLAA may be a material consideration in the determination of such planning proposals;
- The SHLAA does not preclude sites being developed for other suitable uses;
- The SHLAA does not preclude other sites that have not been identified in the SHLAA from being developed for housing.

3 INVOLVEMENT OF STAKEHOLDERS IN THE SHLAA

Joint Methodology for the Exeter Housing Market Area

- 3.1 In order to produce a robust and reliable SHLAA, *CLG Guidance* advises that the assessments be prepared in collaboration with stakeholders in the housing sector. Where housing market areas cover more than a single authority's area, the relevant local authorities are advised to work in partnership to prepare joint assessments or use a consistent methodology. As explain in paragraphs 1.9 and 1.10 above, a joint *Methodology* has been prepared for use by the partner local authorities in the Exeter HMA. As the partner authorities are at different stages in their plan preparation programmes, it has not been possible to prepare a joint SHLAA.
- 3.2 The *Methodology* comprises ten stages:
- Stage 1 Planning the assessment
 - Stage 2 Determining which sources of sites will be included in the assessment
 - Stage 3 Desktop review of existing information
 - Stage 4 Determining which sites and areas will be surveyed
 - Stage 5 Carrying out the survey
 - Stage 6 Estimating the housing potential of each site
 - Stage 7 Assessing when and whether sites are likely to be developed
 - (7a) assessing suitability for housing
 - (7b) assessing availability for housing
 - (7c) assessing achievability for housing
 - Stage 8 Review of the assessment
 - Stage 9 Identifying and assessing the housing potential of broad locations (where necessary)
 - Stage 10 Determining the housing potential of windfalls (where justified)

The SHLAA Panel

- 3.3 During the process of developing the joint *Methodology*, the partner local authorities established a Panel of housing stakeholders. The members of the Panel act on a voluntary basis. The Panel is shared by the partner authorities. Although membership of the Panel has changed over time, there has been a good degree of continuity. This has led to increasing confidence and consistency in applying the *Methodology* to individual SHLAAs. Panel members have also provided detailed advice on the current condition of the housing market and contributed generally to the work of the local authorities in the Exeter HMA. The role and responsibilities of the Panel are explained in further detail in the *Methodology* and the accompanying *Panel Constitution and Terms of Reference*.

SHLAA Panel membership

- 3.4 Invitations for membership of the Panel went out to a wide range of large, medium sized and small housing building companies, architects, estate agents and planning consultants and a representative local Panel was established. The Panel also includes a range of statutory agencies such as the Environment Agency, Highways Authority, Highways Agency and Natural England. The local community is represented, in the case of Exeter City Council by the Exeter Civic Society. The Panel that conducted the assessment of sites in Exeter is set out in Appendix 1. Because there have been changes to Panel membership between the 2009 SHLAA and this review, two lists of Panel membership are provided. Panel members are required to make declarations of interest where any personal, financial or prejudicial interests apply.
- 3.5 Panel meetings were held on 2 November and 7 December 2010 to consider the review of the Exeter SHLAA.

4 THE PLANNING BACKGROUND

National planning policy

- 4.1 *The Planning and Compulsory Purchase Act 2004* introduced major changes to the way the planning policy system works, replacing the former system of county level structure plans and local authority level local plans with regional spatial strategies and local authority level local development frameworks. This legislation also defines the overall aim of spatial planning, which is to help further the aims of sustainable development.

Regional planning policy

- 4.2 On 10 November 2010, the High Court quashed the Coalition Government's revocation of regional spatial strategies (RSS). The Coalition Government still intends to abolish RSSs through the forthcoming Localism Bill, which, they advise, will return decision making powers on housing and planning to local authorities. This includes decisions on housing targets.

Local planning policy

- 4.3 The main policy documents covering spatial development in Exeter are the saved policies of the *Devon Structure Plan 2001-2016*⁹ (the Structure Plan), the *Exeter Local Plan First Review 1995-2011*¹⁰ (the Local Plan) and the *Submission Core Strategy*¹¹, which has been subject to statutory consultation and is timetabled for submission to the Secretary of State in early 2011.
- 4.4 The *Local Plan*'s saved policies promote residential development within Exeter's existing urban area and on the eastern side of the City in the Newcourt area. Strategic planning policy in the *Submission Core Strategy* also promotes residential development in these locations, including within two 'Regeneration Areas' (Water Lane and the Grecian Quarter). In addition, it seeks to deliver sustainable housing growth on the eastern side of the City at Monkerton/Hill Barton and on the south-western side of the City at Alphington. Newcourt, Monkerton/Hill Barton and Alphington are identified as strategic allocations.
- 4.5 The *Structure Plan* sets a target to provide 6,700 new dwellings in Exeter between 2001 and 2016. This housing target will be superseded by the Core Strategy, once it has been adopted. The *Submission Core Strategy* seeks to provide 12,000 new dwellings in Exeter between 2006 and 2026.

⁹ Devon County Council (October 2004) *Devon Structure Plan 2001-2016*

¹⁰ Exeter City Council (2005) *Exeter Local Plan First Review 1995-2011*

¹¹ Exeter City Council (August 2010) *Exeter Local Development Framework Submission Core Strategy 2006-2026*

5 CONDITION OF THE HOUSING MARKET

- 5.1 *CLG Guidance* notes that the effect of market conditions on economic viability should be taken into account in assessing the deliverability and developability of potential housing sites to produce a realistic and reliable assessment.
- 5.2 As elsewhere in Britain, the South West region's economy was affected by the global and national economic crises of 2008 and the subsequent national recession. By late 2009, house prices in the region had started to recover. By the middle of 2010, they had stabilised at a level not too far below that which existed prior to the crises. However, the *Regional Economic Profile* for October 2010¹² concludes that the prospects for the region's house building industry are uncertain. Private sector investment in the housing building industry continues to be fairly low and focussed on serviced or serviceable land. Constraints on public spending arising from the Government's Spending Review will limit the degree to which publicly funded housing schemes can continue to (partially) compensate for the low number of private sector completions¹³.
- 5.3 The Panel has taken the current housing market factors into account in coming to their decisions on the deliverability and developability of housing, which is reflected in their conclusions. The Panel has also provided some general advice on how the current market conditions should be reflected in the delivery of housing in the sub-region. This advice relates to the adjustment of build out rates in Years 1-5 on sites where development has and has not started, and is further moderated by the size of development – less than 15 dwellings or more (see Appendix 2).
- 5.4 Market conditions will change over time, as confidence and optimism in the economy generally, and the housing market in particular, ebb and flow. It will be particularly important therefore that the state of the housing market is reconsidered each time the SHLAA is reviewed.

¹² South West RDA. (October 2010). *Economics Review No.21*.

¹³ Savills Research. (September 2010). *Spotlight on Development and Investment*.

6 THE SCOPE OF THE ASSESSMENT

Stage 1: Planning the assessment

- 6.1 Preparation of this SHLAA has followed on from work on the 2009 edition, together with other work in the Exeter HMA undertaken by Teignbridge, Mid Devon and East Devon District Councils and the Dartmoor National Park Authority. The work, including all sites visits, technical assessments and the production of information material, was undertaken in-house. There has been a commendable practice of Panel members undertaking their own site visits.

Stage 2: Determining which sources of sites should be included in the assessment

- 6.2 The *CLG Guidance* provides information on the sources of sites with potential for housing. The sources comprise sites already in the planning process and those that are currently outside. They include:

Sites in the planning process:

- Sites with unimplemented / outstanding planning permission for housing;
- Housing sites where construction has commenced;
- Existing housing allocations and site development briefs;
- Land allocated (or with permission) for employment or other land uses that are no longer required for those uses; and

Sites not currently in the planning process:

- Vacant and derelict land and buildings;
- Surplus public sector land;
- Land in non-residential use that may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development;
- Additional housing opportunities in established residential areas, such as underused garage blocks;
- Sites in rural settlements and rural exception sites;
- Urban extensions;
- Large scale redevelopment and redesign of existing residential areas.

Stage 3: Desktop review of existing information

- 6.3 When preparing the 2009 Exeter SHLAA, Stage 3 involved a desktop review of all the sources of sites outlined in paragraph 6.2 above. The review was coupled with a 'call for sites', which provided an opportunity for the public, landowners and other bodies to submit any potential housing sites for consideration in the SHLAA. A 'call for sites' public notice was published in the local press in January 2008, inviting submissions. In the same month, letters inviting submissions were sent to those on the Local Development Framework consultation database.
- 6.4 In preparing this, the second Exeter SHLAA, the Council asked all landowners and agents of sites assessed in the 2009 SHLAA to confirm whether or not they still wished their land to be included, and to advise of any changes in circumstance. A second 'call for sites' was also undertaken in July 2010, in the same manner as described in paragraph 6.3.
- 6.5 Site information from this work and the call for sites was recorded and assessed in the manner set out in the *Methodology*. The information was collated for consideration by members of the SHLAA Panel. In total, **61 sites** were identified for assessment in the 2010 SHLAA.

Site size threshold

- 6.6 In accordance with the *Methodology*, a minimum site size threshold of five dwellings (gross) or 0.15 hectares was applied throughout the planning area.
- 6.7 Paragraph 5 of the *CLG Guidance* indicates that the SHLAA should not include an allowance for windfalls in the first 10 years of the development plan, unless there are justifiable local circumstances that prevent specific sites being identified. However, when a windfall site comes forward and planning permission is granted, it becomes part of housing supply. Rather than assess all sites with planning permission (or permission subject to the completion of a Section 106 Agreement) individually, the SHLAA Panel has recommended that a 'model' approach is taken to discount some of these sites (see Appendix 2). This model has been applied to existing planning permissions for the 5 year housing land supply figures and the housing trajectory.

Stage 4: Determining which sites and areas will be surveyed

- 6.8 The sites identified under the various headings shown in paragraph 6.2 above, or submitted during the 'calls for sites', were given a preliminary scoping (Stage A Assessment – see Table 1 below) to determine whether they should be taken forward for consideration in detail (Stage B Assessment). The scoping entailed applying the site threshold criterion and analysing whether the site conformed to strategic policy, biodiversity and geodiversity protection criteria and flood risk criteria (see Table 1 below).
- 6.9 Table 1 sets out the scoping criteria for assessing whether a site should be taken forward for detailed consideration in the SHLAA.

Table 1: Stage A Assessment: Criteria for exclusion from the SHLAA	
Conformity with strategic policy for development distribution	
Does the location of the site accord with strategic policy for development set out in the Submission Core Strategy?	Yes: Assess the identified site further No: Discount the site from the SHLAA and assign a nil housing potential
Biodiversity and geodiversity	
Does the site fall within, or will development cause harm to, a Site of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC)?	Yes: Discount the site from the SHLAA and assign a nil housing potential No: Assess the identified site further
Land at risk of flooding	
Is the site situated within Flood Risk Zone 3b (i.e. the functional flood plain)?	Yes: Discount the site from the SHLAA and assign a nil housing potential No: Assess the identified site further

Stage 5: Carrying out the survey

- 6.10 Those sites that pass the Stage A Assessment should then be examined in detail through a Stage B Assessment. To carry out a Stage B Assessment, it is necessary to undertake a variety of technical investigations and site surveys for each site. A great deal of information on heritage characteristics, biodiversity, land use, flood risk etc is accessible on Exeter City Council's geographic information system (GIS). Site characteristics recorded included site size, site boundaries, current uses, surrounding land uses and characteristics of the surrounding area, physical constraints (e.g. slope, access, flood risk, natural, archaeological and historic features), development progress (where applicable) and potential for mixed use development.

Stage 6: Estimating the housing potential of the site

- 6.11 To estimate the housing potential of sites, the *Methodology* applies 'gross to net developable area ratios' across the housing sub-region. However, it allows the partner authorities to depart from this where it can be justified. The ratios take into account the proportion of the total site area needed to provide roads, pavements and other services and facilities.
- 6.12 The 2009 Exeter SHLAA includes evidence to justify a departure from the *Methodology's* ratios (see Appendix G of the 2009 SHLAA). The evidence for Exeter suggests that, in general, sites with extant permission that measure up to 1 ha gross have a net developable area for housing of 100% (i.e. the whole site is developable), whilst sites measuring 1 ha or more have an average net developable area of 80%. In general, these ratios have been applied to sites in the 2010 SHLAA. Where a net developable area departs from the 'Exeter-specific' ratios, this is explained in the individual site assessment (see Appendix 3).
- 6.13 Density standards are then applied to the net developable area of each site, to estimate their housing potential. The *Methodology* contains standard densities for the sub-region, but again allows a partner authority to depart from these where it has an adopted density policy. In accordance with *PPS3*, Policy CP4 of the *Submission Core Strategy* states that residential development should achieve the highest appropriate density compatible with the protection of local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network. Rather than applying the *Methodology's* density standards, the housing potential of each site in the 2010 SHLAA has been calculated on a case by case basis in the context of Policy CP4, in consultation with the Council's Development Management Team and SHLAA Panel. The densities that have been applied are explained in the individual site assessments (see Appendix 3).
- 6.14 In order to apply appropriate levels of housing delivery to the SHLAA housing trajectory, annual 'build out' rates must be applied to sites where development would take place over a number of years. The *Methodology* sets out the following agreed approach to build-out rates for the Exeter HMA area:
- Up to 25 dwellings assumed to be completed in Year 1; and thereafter
 - A maximum of 50 dwellings per year for a single developer; or
 - Sites up to 500 dwellings, assume a single developer and maximum build of 50 dwellings per year; or
 - Sites of 501-1000 dwellings, assume two developers and a maximum build of 100 dwellings per year (2 x 50 dwellings).
- 6.15 The *Methodology* states that the above rates may be moderated by market condition factors, or other known circumstances that may affect housing completion rates. In view of current depressed housing market conditions, for the 2010 SHLAA the rates are effectively halved for all sites predicted to come forward during the 1-5 year time band, as recommended by the Panel and set out in Schedules 1 and 2 of Appendix 4.

Stage 7: Assessing when and whether sites are likely to be developed

- 6.16 As set out in paragraph 2.1 above, the purpose of a SHLAA is twofold: to identify **deliverable** sites for the first 5 years of a plan that are ready for development and to keep this topped up; and to identify specific **developable** sites from years 6 onwards.
- 6.17 *PPS3* states that in order to be considered deliverable, a site should, at the point of adoption of the relevant DPD:
- be **available** – the site is available now;

- be **suitable** – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and
 - be **achievable** – there is a reasonable prospect that housing will be delivered on the site within five years.
- 6.18 *PPS3* states that in order to be considered developable, a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available and could be developed at a specific time.
- 6.19 Assessing the suitability, availability and achievability of sites will provide the information that is needed to judge their deliverability and developability, within plan making contexts.
- 6.20 The *CLG Guidance* notes that the assessment of deliverable and developable sites should be made irrespective of the level of housing provision that is actually needed over the plan period.
- 6.21 In considering a site to be **deliverable** for the 2010 SHLAA, the SHLAA Panel applied the following conventions:
- Planning permission, or a planning application, for the development of the site must exist;
 - The site should either be controlled by a housing developer or owned by a land owner who has expressed an interest to sell or a public body (e.g. district council) willing to see the site developed;
 - The site must have the potential to make a contribution to housing delivery during the 5 year period.
- 6.22 Sites that did not have planning permission, or were not currently the subject of a planning application, were considered **developable** in the 6-10 year period or, if there appeared to be significant constraints on delivery, the 11-15 year period. The Panel agreed that this approach was particularly relevant in light of the current depressed housing market.
- 6.23 The Panel made their view clear that, where there were current legal or ownership constraints (for example, the site was occupied by a leaseholder, or highways access relied upon 3rd party land), the site should be regarded as unavailable and therefore discounted from the SHLAA process.
- 6.24 In finalising the SHLAA, the Council departed from the Panel's views in relation to the following sites:
- Site 15: The site is occupied by leaseholders. In the Panel's view, this rendered it unavailable. However, the Council felt that the site could be considered available once the leases expire in 2023.
 - Sites 30 and 77: Devon County Council advised that highways access relies upon 3rd party land in the City Council's ownership. The Panel's view was that these sites were therefore unavailable. However, as the City and County Council's are working together with potential developers to try and resolve access issues, the (City) Council felt that the sites could be considered available in Years 6-10.
 - Sites 44 and 63: These sites form part of two strategic allocations in the Submission Core Strategy. The Panel's view was that the sites should not be considered achievable in Years 1-5, because they are not allocated for development in the adopted development plan and are not the subject of current planning applications. The Council felt that the sites could realistically come forward towards the end of Years 1-5, because they are the subject of detailed pre-application discussions and because the Council has approved Masterplans for the strategic allocations that support the principle of development.

- Sites 66b, 68, 69 & 84-86: The Panel's advice was that these sites are all suitable, available and achievable for development. The Council's view was the sites are unsuitable for development on strategic planning policy grounds.

6.25 The assessments of the above sites contained in Appendix 3 provide more detailed commentary on why the Council, and therefore the SHLAA, departs from the Panel's views. Five Panel Members felt able to sign-off the SHLAA, notwithstanding their differences of opinion with the Council. Three Panel Members did not agree to the sign-off and the final eleven Members abstained from comment.

Stage 7a: Assessing suitability for housing

6.26 *CLG Guidance* states that a site is suitable for housing if it offers a suitable location for development and would contribute to the creation of mixed communities. It goes on to say that sites allocated in existing plans and those with an extant planning permission will generally be suitable, subject to any changes in circumstances. For other sites, it lists a range of factors to be considered in assessing a site's suitability:

- policy restrictions;
- physical problems or limitations;
- potential impacts; and
- environmental conditions.

6.27 The *Methodology* expands those factors, applying the two stage approach to assessing the suitability of a site set out in paragraphs 6.8 to 6.10 above. Stage A consists of assessing sites against a range of strategic considerations. If a site fails at Stage A, it is deemed to be in an unsuitable location for housing development and does not proceed to the more detailed Stage B Assessment.

6.28 A Stage B Assessment consists of checking sites against a wide range of development criteria. Those factors are:

- access to public transport, services and facilities;
- highway access, pedestrian and cycle links;
- land status;
- constraints to delivery;
- infrastructure capacity; and
- compatibility with existing and/or proposed surrounding uses.

Stage 7b: Assessing availability for housing

6.29 The site submission proforma contained in the *Methodology* includes a question asking landlords to indicate if their proposed site is available and when it may come forward. There could be legal or ownership problems such as lease, tenancy or licence obligations, multiple ownerships or ransom strips that will affect availability and it is important that those matters are known about when sites are considered. For the 2010 SHLAA, if a site was not confirmed as available using the proforma, it was excluded on grounds that it did not meet with the requirements set out in *PPS3*.

Stage 7c: Assessing achievability for housing

6.30 'Achievability' is defined as whether there is a reasonable prospect that housing will be developed within specified time periods. This will be affected by market conditions, the costs associated with the development and the phasing of development schemes. The professional expertise and experience of Panel members adds considerably to the thoroughness and rigour of the achievability assessments.

- 6.31 To help the Panel form its views on achievability, for each site, information was provided on any physical and community infrastructure requirements and other factors needing to be taken into account.

Stage 7d: Overcoming constraints

- 6.32 Where constraints to development on otherwise suitable sites were identified, consideration was given as to how these might be overcome, such as mitigation measures, extending development timescales or adjusting site envelopes to enable access problems or other spatial constraints to be overcome.

Stage 8: Review of the assessment

- 6.33 *CLG Guidance* notes that once the initial survey of sites and the assessment of their deliverability / developability have been made, the housing potential of all the sites should be shown as an indicative housing trajectory. At this stage, judgements may be made on whether sufficient sites to provide for at least the first 10 years of housing development needed in the plan period have come forward, how quickly development is likely to proceed and whether any more detailed analysis (by area or time of development) of the housing potential is needed. Any changes in housing market or development viability factors will need to be considered.
- 6.34 *CLG Guidance* points out that if there appear to be insufficient sites, then the shortfall should be planned for, either by identifying broad locations for growth inside or outside settlements or using a windfall allowance.
- 6.35 *PAS Guidance* indicates that a SHLAA should function as an ongoing database, updated regularly. It goes on to state that where there are likely to be sufficient sites available, there is no need to update the study to assess further sites for consideration when preparing a Site Allocations DPD. Panel Members agreed that it should normally be possible to update the database without the need for a further comprehensive study.

Stage 9: Identifying and assessing the housing potential in broad locations (where necessary)

- 6.36 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. It is a way of indicating to local communities where future development will go, and indicates to developers where development will be encouraged. *PPS3* and the *CLG Guidance* indicate that broad locations should be allocated to years 11 onwards of the trajectory if the SHLAA fails to indicate sufficient capacity for dwellings to meet the housing requirement in terms of specific sites.

Stage 10: Determining the housing potential of windfalls

- 6.37 Paragraph 59 of *PPS3* states that 'an allowance for windfalls should only be made where it is not considered possible to allocate sufficient land to meet the requirement at least for the first 10 years (of the trajectory).'
- 6.38 A windfall allowance has not been made in the 2010 SHLAA. However, it should be noted that on the basis of past completion rates, windfall sites will continue to make a contribution towards housing requirements in Exeter. Following a future review of the SHLAA, it may be appropriate to make a windfall allowance.

7 FINDINGS OF THE EXETER SHLAA

7.1 A total of 228 sites have been considered as part of the Exeter 2010 SHLAA, comprising:

- 46 sites with planning permission at 1 November 2010, that are under construction;
- 121 sites with planning permission / permission subject to the completion of a S106 Agreement at 1 November 2010, where development has not started; and
- 61 'SHLAA sites', comprising 44 sites included in the 2009 SHLAA and resubmitted for assessment in the 2010 update, and 17 sites submitted during the 2010 call for sites.

Sites with planning permission at 1 November 2010 that are under construction

7.2 The SHLAA assumes that the 46 sites falling into this category will continue to be built out, in most cases in accordance with the model approach for current market conditions that has been agreed with the Panel and is set out in Appendix 2. The only exception to this is site ref. 1006 (see Table 2 below) for which a higher build out rate than the model is assumed, based on the completion rate in 2009/10. The model concludes that 14 of the 46 sites will contribute to housing delivery from Year 1 onwards, as set out below. The other 32 sites comprise small schemes and the model assumes that these will be completed before the start of Year 1.

Site ref.	Address	Units not yet constructed at 1 Nov 2010	Yield - Years 1-5 (Base date 01.04.11)
1004	County Ground, Church Road	84	72
1005	County Ground, Church Road	53	41
1006	Former Royal Naval Stores Depot, Topsham Road	301	204
1008	Former Garage Site, Verney Street	67	55
1010	Crossmeads Conference Centre	58	33
1015	Land adjacent to 18 & including 29 Lower North Street	36	11
1017	Episcopal Building & York Wing, Dinham Road	60	35
1021	Former Cold Storage Store, Chancel Lane	89	64
1022	Land at Beacon Avenue	90	78
1023	Land rear of Oakridge & Oaklands, Cowick Lane	13	1
1031	Land rear of 87-98 Merlin Crescent	18	6
1033	Cecil Boyall House, Victory Wing & Magdalen House, Southernhay East	13	1
1040	Land adjacent Strathcairn, Sylvan Road	1	1
1066	Apollo Works, Looe Road	14	2
Total			604

Sites with planning permission / permission subject to the completion of a S106 Agreement at 1 November 2010, where development has not started

7.3 The model has been applied to sites of 15 units or more with planning permission / permission subject to the completion of a S106 Agreement, but not under construction at 1 November 2010. A summary of the results is shown in Table 3 below. It is considered that 11 of these sites will contribute to housing delivery in Year 1 onwards.

Table 3: Sites of 15 dwellings or more with planning permission, but not started						
Site ref.	Address	Total potential yield	Excluded /included	Reason for exclusion / inclusion	Yield - Years 1-5 (Base date 01.04.11)	Yield - Years 6+
1011	Quintana Gate, Bartholemew Road East	18	Included	Applicant has confirmed an intention to implement.	18	0
1026	137-137A Cowick Street	50	Included	Scheme has the benefit of social housing grant and the Council DM Team also consider it likely to be implemented.	50	0
1027	Former St Loyes College, Topsham Road	208	Included	A reserved matter application is likely to be submitted in the near future.	87	121
1028	SEF Site & Lower RNSD Site, Topsham Road	446	Included	Scheme was renegotiated & S106 Agreement signed in 2010, to ensure viability.	62	384
1029	Langdon Site, Old Rydon Lane	47	Included	Scheme was renegotiated & S106 Agreement signed in 2010, to ensure viability.	47	0
1030	ORLN Site, Old Rydon Lane	285	Included	Scheme was renegotiated & S106 Agreement signed in 2010, to ensure viability.	62	223
1032	University of Plymouth, Earl Richards Road	156	Included	Owner has confirmed the site will be developed, although possibly not the extant permission. Pre-application discussions are underway for an alternative scheme. As it is highly likely that a scheme will be implemented within the next few years, the extant permission is counted. However, the assumed year of commencement is delayed by a further year to allow for the potential need to obtain permission for the alternative scheme.	37	119

1128	Site of St Paul's Church, Hall & Parsonage, Burnthouse Lane	23	Included	An RSL scheme. Grant secured from HCA and due to complete in mid 2011.	23	0
1132	Land at Central Station Yard	28	Excluded	The developer hasn't requested HCA grant. Applicant has not confirmed an intention to implement, after being contacted.	0	0
1145	Land at Rennes House, Vaughan Road	21	Included	Council's DM Team advises that applicant intends to implement the permission.	21	0
1162	1-11 Sidwell Street	96	Excluded	Permission is subject to completion of a S106 Agreement. Applicant does not intend to sign or implement the permission.	0	0
1163	Halford Wing, Dean Clarke House, Southernhay East	40	Included	Scheme comprises self-contained student flats. S106 Agreement was signed in November 2010 and it seems likely to be implemented.	40	0
1164	Bishop Blackhall School, Pennsylvania Road	23	Included	Council's DM Team advises that applicant intends to complete by Sept 2011.	23	0
Total		1,451				
Total discounting exclusions					470	847

- 7.4 The vast majority of sites with planning permission but not under construction fall below the 15 dwelling threshold for discounting set out in the model approach.
- 7.5 The Panel considers it reasonable to assume that all of these permissions will be implemented. They have advised that, under current economic conditions, landowners of small sites will only go to the expense of making a planning application if they intend to build. However, following discussions with the Council's Development Management and Housing Enabling Teams, and where possible with the applicants/landowners themselves, it is in fact thought/known that the four permissions set out in Table 4, which are below the 15 dwelling threshold, will not be implemented.
- 7.6 Once these discounts are taken into account, it is considered that sites with permission for fewer than 15 dwellings, where development has not yet started, will contribute a total of 329 dwellings, all during Years 1-5.

Table 4: Excluded sites of fewer than 15 dwellings, not started			
Site ref.	Address	Total potential yield	Reason for exclusion
1001	12-16 Richmond Road	12	Scheme was permitted in 1989 and is part implemented. Landowner does not intent to build the remaining dwellings.
1009	Rowe Memorial Hall, The Mint	11	Landowner has confirmed that the permission will not be implemented.
1018	Frickers Yard, Willeys Avenue	13	Site is for sale. Council's DM Team has advised it is unlikely that the permission will be implemented. The applicant has been contacted, but has not responded.
1160	Locks, Ladysmith Road	6	Subject to a S106 Agreement that has not been signed after 3 years. Considered unlikely to be signed.
Total		42	

SHLAA Sites

- 7.7 In summarising the findings of the 61 SHLAA sites submitted for assessment by landowners and/or their agents, it is important to bear in mind the overarching principles governing the assessment. In order to be considered a potential contributor to the stock of housing land, a submitted site should be **suitable**, **available** and **achievable** (see paragraph 6.17 above). Assessment of those factors enables judgements to be made on whether a site is **deliverable** (see paragraph 6.17) or **developable** (see paragraph 6.18).
- 7.8 Detailed suitability, availability and achievability assessments of the 61 SHLAA sites are set out in Appendix 3. The following paragraphs provide a summary of the assessments.
- 7.9 Fifteen sites proposed by landowners and/or their agents were excluded at Stage A of the suitability assessment. This was because of clear conflict with strategic policy set out in Policy CP1 of the *Submission Core Strategy*, and/or due to the unacceptable impact of any development upon biodiversity/geodiversity, and/or because the site lies within Flood Zone 3b where the principle of residential development is contrary to national planning policy set out in *Planning Policy Statement 25: Flooding (PPS25)*. These sites are set out in Table 5 below:

Table 5: SHLAA sites discounted at Suitability Test Stage A		
Site ref.	Address	Reason for exclusion
11	Land off Hambeer Lane	Strategic policy
13	Oaklands Riding School & The Rosary, Balls Farm Rd	Strategic policy and partly within Flood Zone 3b
21	Land at Stoke Hill	Strategic policy
31	Oakfields, Church Hill	Strategic policy
66b	Land east of the M5, Exeter Road, Topsham	Strategic policy
68	Land north of Newcourt Road, Topsham	Strategic policy
69	Land north of Exeter Road, Topsham	Strategic policy
71	Attwells Farm, Exwick Lane	Strategic policy
74	Land west of Salmonpool Bridge	Entirely within Flood Zone 3b
75	Land east of Salmonpool Bridge	Entirely within Flood Zone 3b
78	Land adjacent 2 Hill Cottages, Church Hill	Strategic policy
84	Land north of Wessex Close, Topsham	Strategic policy
85	Five Acres, Exeter Road, Topsham	Strategic policy
86	Land s. of Rushmore Nursery, Newcourt Rd, Topsham	Strategic policy
87	Land opp. Riversmeet House, Riversmeet, Topsham	Strategic policy and entirely

		within Flood Zone 3b
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- 7.10 A further 7 SHLAA sites were excluded following Stage B of the suitability assessment. These sites are set out in Table 6 below, alongside a brief explanation for their exclusion.

Table 6: SHLAA sites discounted at Suitability Test Stage B		
Site ref.	Address	Reason excluded
38	Land south of Gipsy Hill Lane	Highways access and close proximity of the M5
47	Land north of Honiton Road	Site required for employment use
53	Land north of West of England School, Topsham Road	Impact on landscape character, green infrastructure and Ludwell Valley Park
56	Bishop Court Sand Quarry, Sidmouth Road	Highways access
64	Playing field south of Wear Barton Road	Impact on green infrastructure / loss of playing field
72	Land off Little Johns Cross Hill Lane	Highways access
76	Marypole Head, Pennsylvania Road	Highways access

- 7.11 The remaining 39 SHLAA sites were then subjected to a test of availability. All of the sites passed this test, by reason of their submission for assessment in the SHLAA using the proforma.
- 7.12 At a meeting on 2 November 2010, the SHLAA Panel was asked to consider the achievability of the 39 remaining sites. In summary, the Panel advised that the 4 sites set out in Table 7 below are unachievable because development would be economically unviable.

Table 7: SHLAA sites discounted as unachievable	
51	Land at Aspen Close
73	17-19 Water Lane
79	23 Causey Lane
80	Bayonne, Pinhoe Road

- 7.13 Table 8 lists the 35 SHLAA sites considered to have passed the tests of suitability, availability and achievability and summarises their potential contribution to housing provision to 2026. It is concluded that the sites have the potential to deliver 264 dwellings in Years 1-5 and a further 4,623 dwellings thereafter to 2026.

Table 8: SHLAA sites considered suitable, available and achievable				
Site ref.	Address	Yield – Years 1-5 (base date 01.04.11)	Yield – Years 6-10	Yield – Years 11-15
2	Land off St Andrews Road	0	6	0
4	Former Guide Dogs for the Blind Kennels, Exwick Lane	0	18	0
9	Nos. 36-38 Well Street	5	0	0
15	Land bounded by St Sidwell St, Paris St, Belgrave Rd & Summerland St	0	0	150
16	Exeter Royal Academy for Deaf Education, Topsham Road	0	149	0
18a	Land west of Shillingford Road	0	13	0
18b	Land east of Shillingford Road	0	77	0
18c	Land between Chudleigh Road & Dawlish	0	225	62

	Road			
19	Land north of Markham Lane	0	65	0
20	Land west of Chudleigh Road	0	55	0
23	Exmouth Junction, Prince Charles Road	0	144	0
30	Ibstock Brick, Harrington Lane	0	225	7
34	Land south the Pinn Brook	0	0	17
35	Land north & south of Tithebarn Lane	0	0	249
37a	Land east of Pinn Lane	0	0	37
37b	Sandrock Nursery, Pinn Lane	0	0	71
39	Land at Monkerton	0	425	0
40	Land north & south of Harts Lane	0	0	135
41	Land west of Pilton Lane	0	63	0
42	Land adjacent Higher Furlong, Hollow Lane	0	59	0
43	Hessary, Hollow Lane	0	47	0
44	Land at Hill Barton Farm	62	500	208
45	Land east of Hill Barton Road	62	177	0
46	Hill Barton Farm, Hill Barton Road	0	7	0
54	Land adjacent Exeter Arms Hotel, Rydon Lane	23	0	0
59	Land at Beech Cottage, Rydon Lane	0	35	0
60	Land east of the railway, Old Rydon Lane	0	0	110
61	Land south of Old Rydon Lane	0	86	0
62	Exeter Golf & Country Club Practice Ground	0	129	0
63	Land north of Topsham Road	112	488	0
66a	Land west of the M5, Topsham Road	0	20	0
77	Pinhoe Quarry	0	225	55
81	The Vines, Gipsy Lane	0	0	31
82	Clystview, Hollow Lane	0	12	0
83	Land e. of Newcourt House, Old Rydon Lane	0	17	0
Total		264	3,267	1,356

Five year supply of deliverable land for housing (National Indicator 159)

- 7.14 *PPS3* sets out a requirement for local planning authorities to identify and maintain a rolling five year supply of deliverable land for housing, drawing on evidence from the SHLAA. This requirement was reconfirmed in a letter to all Local Planning Authorities from the Chief Planning Officer, dated 6 July 2010.
- 7.15 Table 9 below reveals that, following the process of site assessment set out in paragraphs 7.1 to 7.12 above, there is a projected deliverable supply of dwellings in Exeter over the five years commencing on the 1 April 2011 of 1,667 dwellings.

Table 9: Potential number of dwellings that could be built in each of the first 5 years						
Source of dwellings	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Sites with planning permission at 01.11.2010 under construction	294	231	76	3	0	604
Sites with planning permission / permission subject to s106 Agt (15 units +) at 01.11.2010 where development has not started	46	60	126	128	110	470
Sites with planning permission / permission subject to s106 Agt (less than 15 units) at 01.11.2010 where development has not started	6	323	0	0	0	329
SHLAA sites	0	12	40	87	125	264

Total	346	626	242	218	235	1,667
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- 7.16 The amount of deliverable housing land required to provide a 5 year supply depends upon the strategic planning document used for comparison. There are two possible documents for Exeter – the *Structure Plan (2001- 2016)* and the *Submission Core Strategy (2006- 2026)*. The relevant five year requirements for each document are set out in Tables 10 and 11 below.

Table 10: Five year supply requirement for Exeter under Devon Structure Plan		
A	Structure Plan requirement 2001 - 2016 (15 years)	6,700
B	Implied annual rate 2001 – 2016 (A/15)	447
C	Completions from April 2001 - March 2010	4,610
D	Anticipated completions from April 2010 – March 2011	505
E	Annual average completion rate 2001 to 2011 ((C+D)/10)	512
F	Annual average completion rate required for remainder of the Structure Plan period to 2016 (A-C-D)/5	317
G	5 year supply requirement (Fx5)	1,585

Table 11: Five year supply requirement for Exeter under Submission Core Strategy		
A	Submission Core Strategy requirement 2006 - 2026 (20 years)	12,000
B	Implied annual rate 2006 – 2026 (A/20)	600
C	Completions from April 2006 - March 2010	2,182
D	Anticipated completions from April 2010 – March 2011	505
E	Annual average completion rate 2006 to 2011 ((C+D)/5)	537
F	Annual average completion rate required for remainder of the Submission Core Strategy period to 2026 (A-C-D)/15	621
G	5 year supply requirement (Fx5)	3,104

- 7.17 Note that a completion figure of 505 dwellings has been assumed for the year 2010 to 2011 (Row D). This is based on applying the model approach in Appendix 2 to all sites with extant planning permission / permission subject to the completion of a S106 Agreement at 1 November 2010. It includes 129 dwellings known to have been completed during April to 1 November 2010 and forecasts that a further 376 dwellings will have been completed by 31 March 2011.
- 7.18 The *Structure Plan's* housing target for Exeter of 6,700 dwellings will remain in place until it is superseded upon adoption of the Core Strategy. Table 10 above shows average actual and anticipated completion rates to March 2011 and calculates a five year requirement of 1,585 dwellings. Referring back to Table 9, it can be seen that the five year deliverable figure of 1,667 dwellings **exceeds** the requirement by **82 dwellings**. It equates to a deliverable housing land supply of **5 years and 3 months**.
- 7.19 The *Submission Core Strategy*, if adopted, requires 12,000 dwellings to be provided in Exeter between 2006 and 2026. Table 11 above shows average actual and anticipated completion rates to March 2011 and calculates a five year requirement of 3,104 dwellings. Referring back to Table 9, it can be seen that the five year deliverable figure of 1,667 dwellings **falls short** of the requirement by **1,437 dwellings**. It equates to a deliverable housing land supply of **2 years and 8 months**.

Identification / assessment of sites with potential for housing and estimation of when they are likely to be developed

- 7.20 The second key purpose of the SHLAA is to identify and assess sites with housing potential and estimate when they might be developed over the remaining *Submission Core Strategy* plan period.

- 7.21 Table 12 below reveals that, following the process of site assessment set out in paragraphs 7.1 to 7.12 above, there is a projected deliverable and developable supply of dwellings in Exeter over the 15 years commencing on the 1 April 2011 of 7,137 dwellings.

Table 12: Potential no. of dwellings that could be built during the remaining plan period				
Source of dwellings	Years 1-5 (base date 01.04.2011)	Years 6-10	Years 11-15	Total
Sites with planning permission at 01.11.2010 under construction	604	0	0	604
Sites with planning permission / permission subject to s106 Agt (15 units +) at 01.11.2010 where development has not started	470	713	134	1,317
Sites with planning permission / permission subject to s106 Agt (less than 15 units) at 01.11.2010 where development has not started	329	0	0	329
Deliverable / developable SHLAA sites	264	3,267	1,356	4,887
Total	1,667	3,980	1,490	7,137

- 7.22 The *Submission Core Strategy* sets a target to deliver 12,000 dwellings in Exeter between 2006 and 2026. The calculation in Table 13 below shows that, once actual and anticipated completions to 1 April 2011 are taken into account, the housing requirement falls to 9,313 dwellings.

Table 13: Remaining housing requirement for Exeter under Submission Core Strategy		
A	Submission Core Strategy requirement 2006 - 2026 (20 years)	12,000
B	Implied annual rate 2006 – 2026 (A/20)	600
C	Completions from April 2006 - March 2010	2,182
D	Anticipated completions from April 2010 – March 2011	505
E	Remaining housing requirement to 2026 (A-C-D)	9,313

- 7.23 Referring back to Table 12, it can be seen that the number of potential dwellings coming forward on sites with planning permission and deliverable/developable SHLAA sites **falls short** of the requirement of 9,313 dwellings by **2,176** dwellings.

Assessment of broad locations for growth

- 7.24 As stated in paragraph 6.34 above, *PPS3* and the *CLG Guidance* indicate that if the SHLAA fails to identify sufficient capacity for dwellings to meet the housing requirement in terms of specific sites, the contribution of 'broad locations' should be taken into account from year 11 onwards of the trajectory. Broad locations are defined in the *CLG Guidance* as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. To estimate the housing potential of broad locations, regard should be paid to the nature and scale of potential opportunities within the area and market conditions.
- 7.25 The 2009 SHLAA identified three broad locations for growth in Exeter – Water Lane, the Grecian Quarter and Newcourt. These three broad locations are still considered to offer significant opportunities to deliver housing during the plan period and so are carried forward for reassessment in the 2010 SHLAA. In addition, the Monkerton/Hill Barton area of the City is considered to represent a broad location for growth.

(i) Water Lane

- 7.26 The Water Lane area is identified as a 'Regeneration Area' in the *Submission Core Strategy* (see paragraph 4.4 above). The area is located just outside the City Centre, to the west of the River Exe/Canal and north-east of the mainline railway to Plymouth (see Plan A below). It is previously developed and largely in employment use. It is identified as a broad location for three reasons. Firstly, it forms part of a larger area (the 'Quay/Canal Basin Area', the remainder of which has been recently redeveloped or has planning permission) allocated for comprehensive mixed-use development in the *Local Plan*. Secondly, provision of a significant number of new dwellings in the area forms part of the *Exeter and East Devon New Growth Point Delivery Plan* (2007). Thirdly, the *Exeter Employment Land Review*¹⁴ concludes that the area offers a poor quality location for employment and that alternative uses (e.g. residential) could be considered provided there are no good operational reasons for existing businesses to remain and no evidence of a need to retain employment in the area. As a location for housing, it is highly sustainable and its redevelopment could provide significant regeneration benefits to the City as a whole.
- 7.27 To assess the broad housing potential of the area, the only assumption made is that land already occupied by housing will not be available for redevelopment during the plan period. Once this land is discounted, it is considered that there are around 13.8 ha where housing could feasibly be developed during the latter part of the plan period. Based on applying a net developable ratio of 80% to the area (see paragraph 6.12 above) and a density range of 50-100 dph (a reasonable range, given the area's edge-of-centre location), it is considered that Water Lane could deliver an additional 552 to 1104 dwellings, or a mid-point yield of 828 dwellings.

(ii) Grecian Quarter

- 7.28 The Grecian Quarter is also identified in the *Submission Core Strategy* as a 'Regeneration Area' (see paragraph 4.4. above). It comprises an area of previously developed land in the centre of Exeter, bounded by Sidwell Street to the west, Western Way to the east and Paris Street to the south (see Plan B below). It currently incorporates a variety of land uses, including the City's Bus and Coach Station, employment, retail, leisure, car parking and a small amount of housing.
- 7.29 The Grecian Quarter is identified as a broad location in part due to the City Council's long standing commitment to deliver comprehensive redevelopment in the area. The *Local Plan* allocates the southern part of the site for development and work on a Masterplan is underway. The remainder of the area will be considered through the City Centre Area Action Plan. The area as a whole is highly sustainable and offers the opportunity to deliver significant regeneration benefits to the City.
- 7.30 The SHLAA has already identified a potential supply of 217 dwellings (mid-point yield) from specific sites in the Grecian Quarter during the plan period (see Site 15 in Appendices 3 and 4 and Site 1008 in Appendix 4). To assess the broad housing potential of the rest of the Grecian Quarter, it is assumed that the only areas not available for potential development during the plan period are:
- the St Sidwells Conservation Area, which covers a row of buildings fronting Sidwell Street; and
 - areas of very recent development (i.e. the former Shaul's Bakery site on Verney Street, developed to provide flats; and a block of land off Belgrave Road comprising a new post office sorting house, car park, cinema and affordable housing).

¹⁴ Exeter City Council (2009) *Exeter Employment Land Review*

- 7.31 Discounting these areas and the aforementioned specific sites leaves around 1.45 ha where development could be feasible during the plan period. Given the desirability of achieving a mix of uses in the Grecian Quarter, it is assumed that around a quarter of this area (i.e. 0.4 ha) could potentially deliver housing. Based on applying the *Methodology's* standard minimum density of 101 dph and an upper limit of 250 dph (considered appropriate as this reflects the density achieved on the Shaul's Bakery site), the Grecian Quarter could deliver an additional 40 to 100 dwellings during the plan period, or a mid-point yield of 70 dwellings.

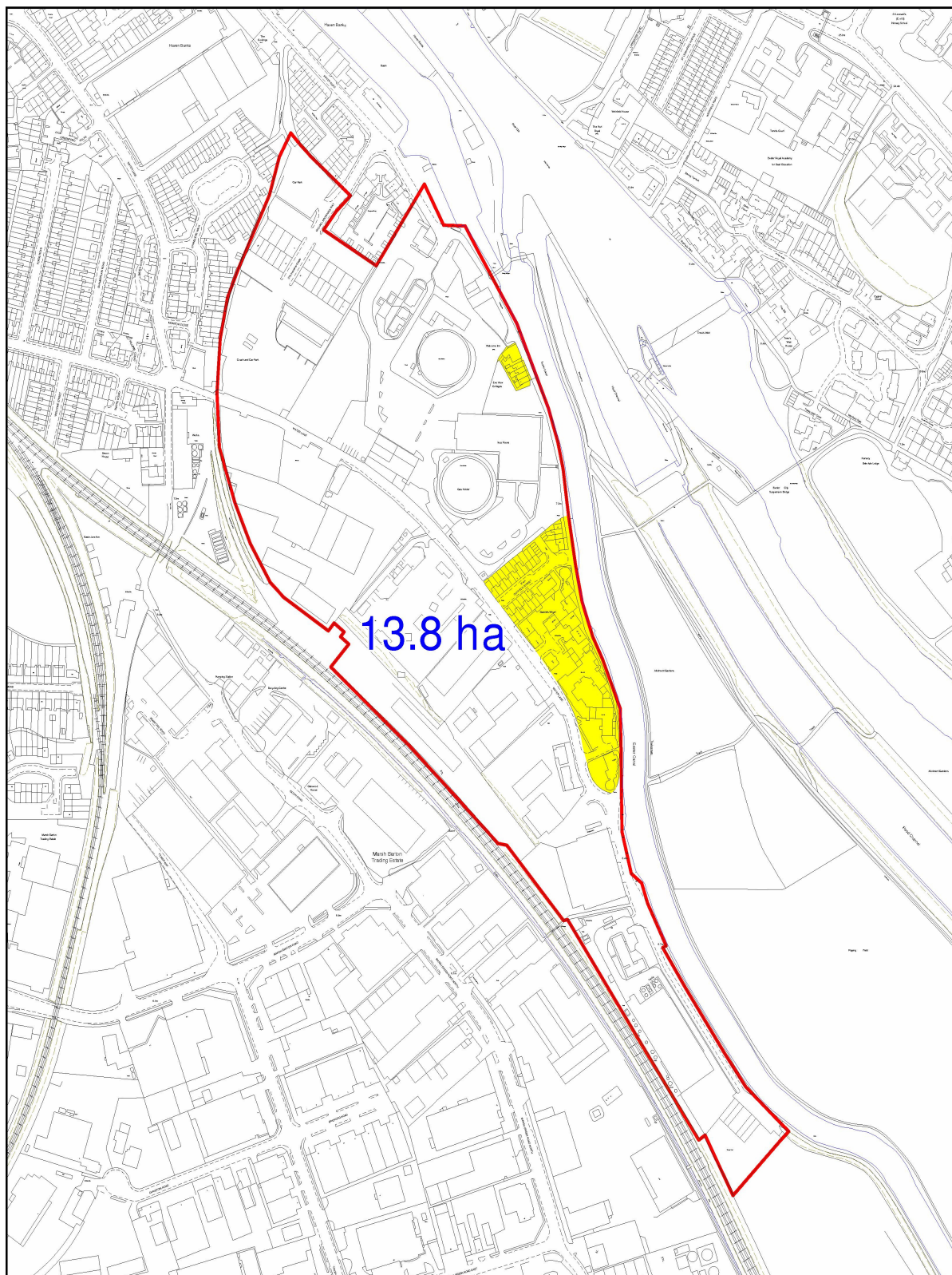
(iii) Newcourt

- 7.32 Newcourt is identified in the *Submission Core Strategy* as a strategic allocation (see paragraph 4.4 above). It is defined by the A379 to the north, Rydon Lane to the west, Topsham Road to the south and the M5 motorway to the east (see Plan C below). It currently incorporates a range of land-uses, including recreational, residential, employment and a significant amount of greenfield land.
- 7.33 A Masterplan for Newcourt has been prepared by consultants and adopted by the City Council for development management purposes. The intention is that it will shortly be adopted as a Supplementary Planning Document (SPD). The Masterplan identifies a number of future uses for the area, including residential, employment, community facilities and green infrastructure.
- 7.34 Planning permission has already been granted for 1,176 dwellings at Newcourt (see Sites 1006 and 1028-30 in Appendix 4). 97 of these dwellings were completed during 2009/10 and it is anticipated that a similar rate of development will be continue in 2010/11. In terms of additional specific sites, the SHLAA identifies a potential yield of 1,044 dwellings (mid-point) (see Sites 59-63 and 84 in Appendices 3 and 4). These yields derive from detailed capacity work undertaken by consultants during the Masterplan's preparation.
- 7.35 The consultant's capacity work has been used to assess the broad housing potential of the rest of Newcourt. In addition to the 2,220 dwellings already identified (1,176 plus 1,044), the Masterplan indicates that Newcourt has the capacity to yield a further 1,334 dwellings during the plan period.

(iv) Monkerton / Hill Barton

- 7.36 Monkerton / Hill Barton is also identified in the *Submission Core Strategy* as a strategic allocation (see paragraph 4.4 above). The area is largely greenfield and lies on the eastern side of the City, between Hill Barton Road to the west, Pinhoe Road to the north, the M5 motorway to the east and Honiton Road to the south (see Plan D). It is surrounded by a range of land-uses, include residential, retail and education to the north and west and employment (Exeter Business Park including the Met Office, and Sowton Industrial Estate) to the south.
- 7.37 A Masterplan for Monkerton / Hill Barton has been prepared by the consultants and adopted by the City Council for development management purposes. The intention is that it will shortly be adopted as a SPD. The Masterplan identifies a number of future uses for the area, including residential, employment, a local centre and green infrastructure.
- 7.38 The SHLAA has already identified a potential supply of 2,386 dwellings (mid-point) from specific sites (see Sites 34-37b, 40-46, 81 and 82 in Appendices 3 and 4) at Monkerton / Hill Barton. These yields derive from detailed capacity work undertaken by consultants during the Masterplan's preparation.
- 7.39 The consultant's capacity work has been used to assess the broad housing potential of the rest of the area. In addition to the 2,386 dwellings already identified, this work indicates

that Monkerton / Hill Barton has the capacity to yield a further 93 dwellings during the plan period.



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Plan A: Water Lane



Water Lane Area



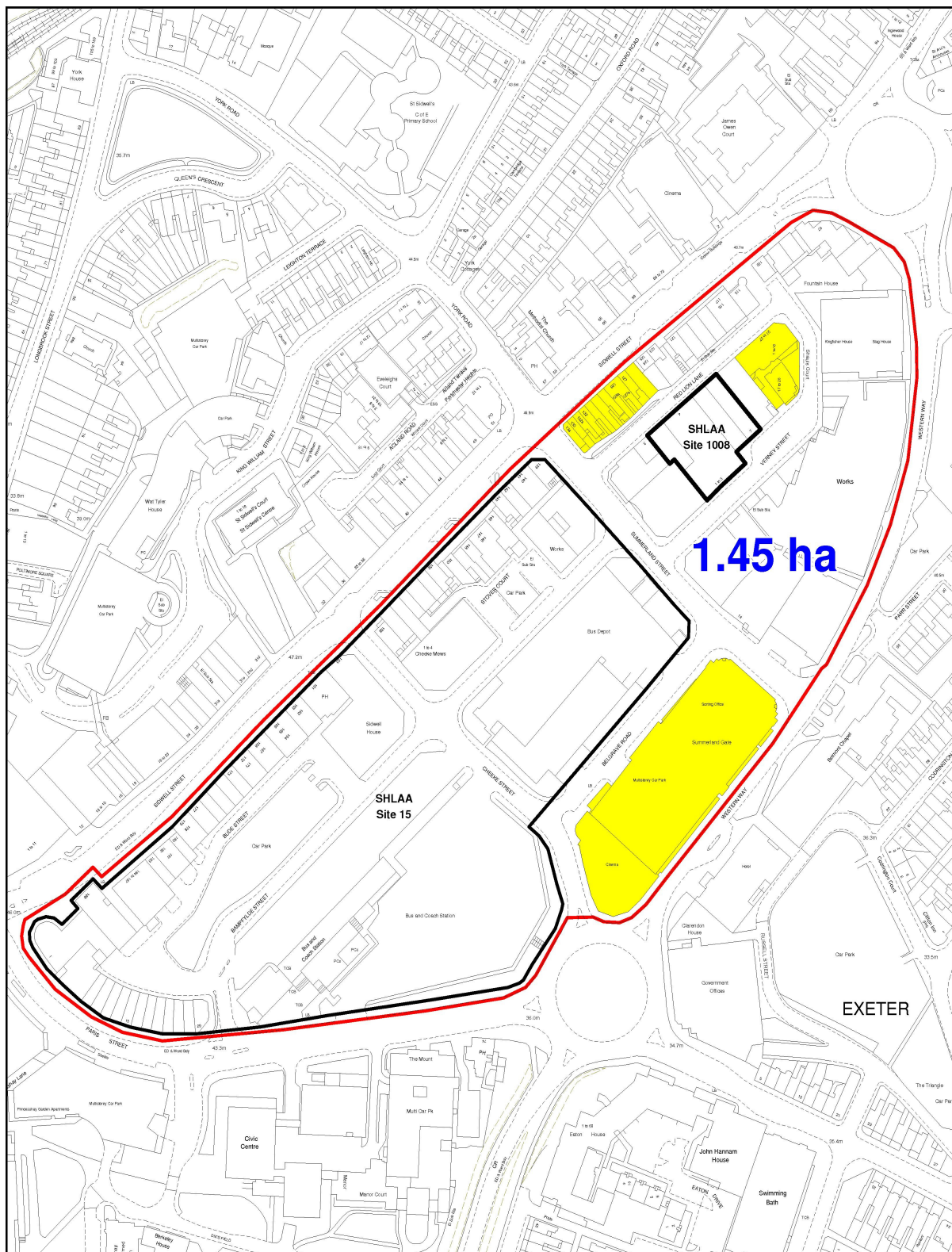
Discounted Areas (Existing Housing)

Planning Services & Building Control, Exeter City Council, Civic Centre, Paris Street, Exeter, EX1 1NN



Exeter City Council

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26/11/2010

Plan B: Grecian Quarter



Grecian Quarter



SHLAA Sites



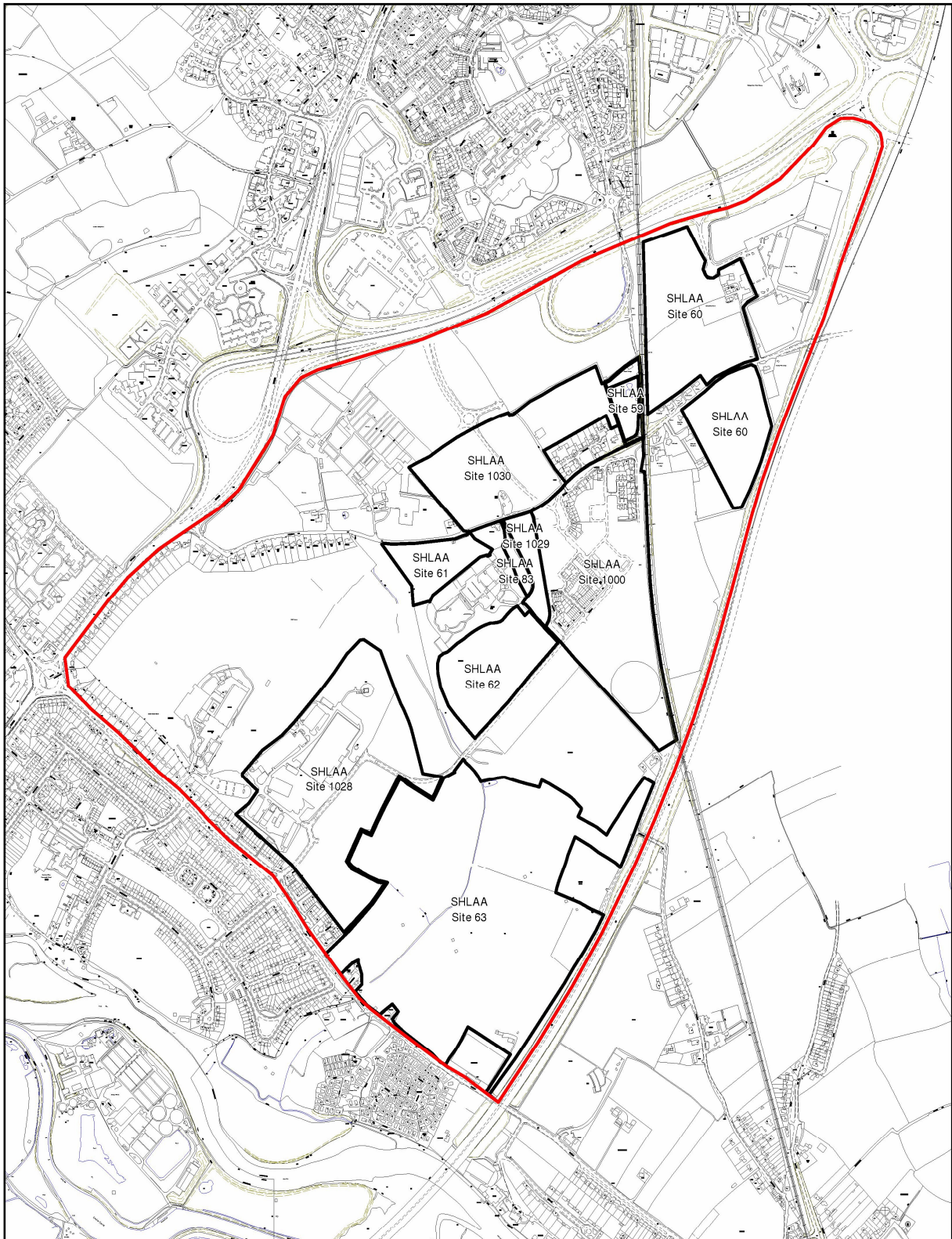
Discounted Areas (Conservation Area & Recent Development)

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Plan C: Newcourt

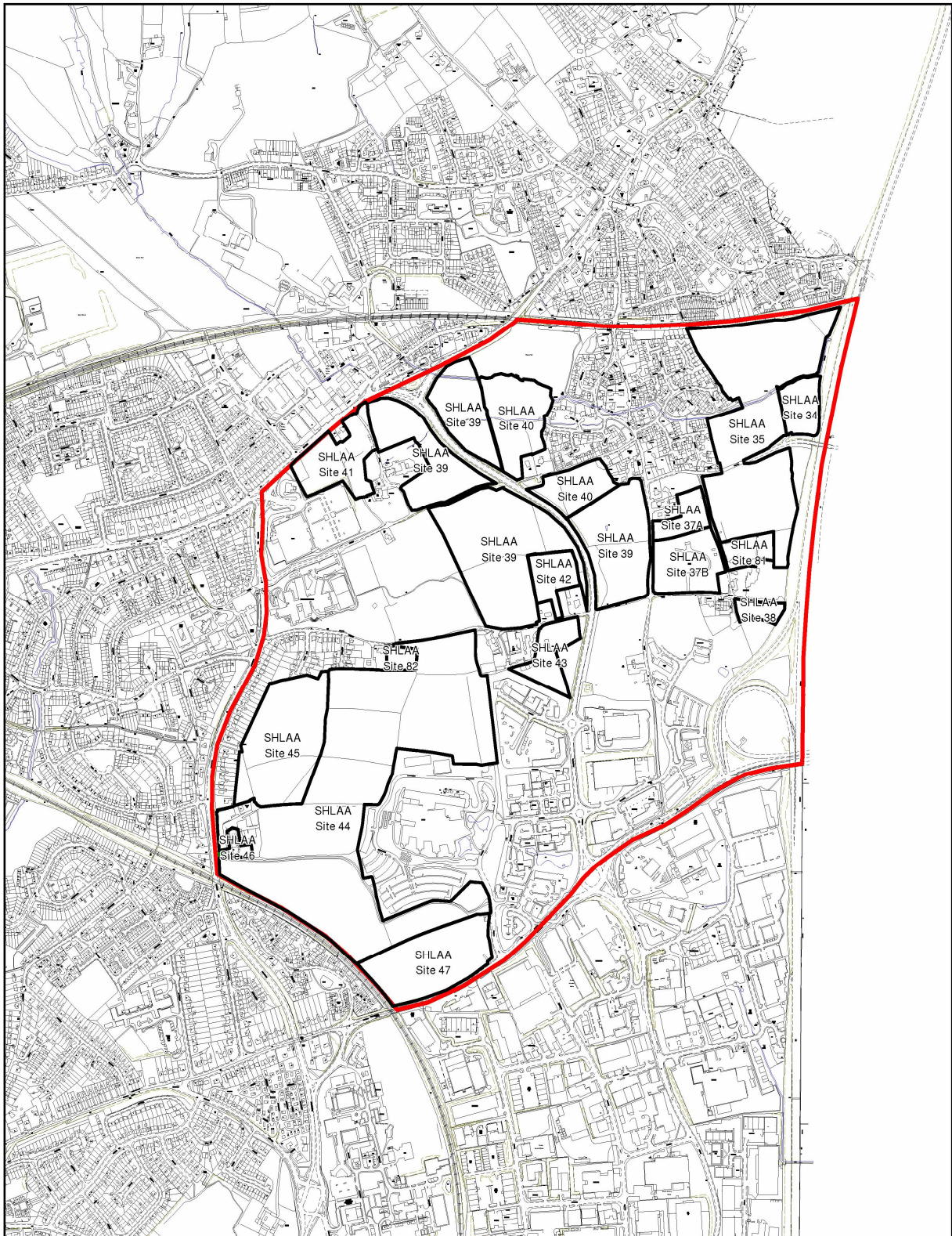
- Newcourt
- SHLAA Sites



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Plan D: Monkerton / Hill Barton



Monkerton / Hill Barton



SHLAA Sites



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7.40 In total, the broad locations for growth could provide a further 2,325 dwellings from Year 11 onwards. Table 14 below summarises the total potential housing land supply over the remaining plan period, once this potential contribution is taken into account.

Table 14: Potential no. of dwellings that could be built during the remaining plan period				
Source of dwellings	Years 1-5 (base date 01.04.2011)	Years 6-10	Years 11- 15	Total
Sites with planning permission at 1 Nov 2010 under construction	604	0	0	604
Sites with planning permission / permission subject to s106 Agt (15 units +) at 01.11.2010 where development has not started	470	713	134	1,317
Sites with planning permission / permission subject to s106 Agt (less than 15 units) at 01.11.2010 where development has not started	329	0	0	329
Deliverable / developable SHLAA sites	264	3,267	1,356	4,887
Broad locations for growth	0	0	2,325	2,325
Total	1,667	3,980	3,815	9,462

7.41 Referring back to Table 13, it can be seen that the number of potential dwellings coming forward during the plan period **exceeds** the requirement of 9,313 dwellings by **149** dwellings. Therefore, Exeter's housing supply currently stands at 101% of the *Submission Core Strategy* requirement, without having applied a windfall allowance.

8 CONSULTATION ON THE SHLAA FINDINGS

- 8.1 This report is not subject to consultation. It is a response to a national policy requirement in *PPS3* that every local planning authority in England should identify sites with housing potential, assess that potential, and when development is likely to take place. The Council will take decisions on which sites will be allocated through the LDF process. The LDF process allows for various stages of consultation. It is during this process that the SHLAA and any other evidence that the Council will rely on in support of its proposals will be subject to public scrutiny.
- 8.2 The findings of this report are based on the conclusions of the SHLAA Panel and an analysis of existing information in the Council's planning database. The report does not define any policy principles nor does it indicate how the Council will act in response to any planning applications or other planning issues. The report, and any reviews, may be subject to scrutiny when development plan documents are independently examined by the Planning Inspectorate.

APPENDIX 1: Exeter SHLAA Panel Membership

2009

Category	Organisation
National volume housebuilder	Barratt Homes
Regional housebuilder	Millwood Homes
Small scale housebuilder	K F Farleigh Ltd
Small scale housebuilder	Stevens Homes
Small scale housebuilder	Gadd Homes
Small scale housebuilder	South West Construction
Development Professional	Bell Cornwell
Development Professional	Harcourt Kerr
Land agent	Rendells
Land agent	Stags
Registered Social Landlord	Devon and Cornwall Housing Group
Registered Social Landlord	Sovereign Housing Group
Statutory Agency	Environment Agency
Statutory Agency	Highways Agency
Statutory Agency	Highway Authority (Devon County Council)
Statutory Agency	Natural England
Community representative	Exeter Civic Society

2010

Category	Organisation
National volume housebuilder	Barratt Homes
Regional housebuilder	Devonshire Homes
Regional housebuilder	Midas Homes
Small scale housebuilder	K F Farleigh Ltd
Small scale housebuilder	Stevens Homes
Small scale housebuilder	Gadd Homes
Small scale housebuilder	Stevens Homes
Development Professional	Harris McMillan
Land Agent / Development Professional	Fulfords Land & Planning
Land agent	Rendells
Land agent	Stags
Registered Social Landlord	Devon and Cornwall Housing Group
Registered Social Landlord	Sovereign Housing Group
Statutory Agency	Environment Agency
Statutory Agency	Highways Agency
Statutory Agency	Highway Authority (Devon County Council)
Statutory Agency	Natural England
Statutory Agency	Homes & Communities Agency
Community representative	Exeter Civic Society

APPENDIX 2: 2010 'Market Conditions Model' for adjusting the five year housing land supply calculations to reflect the deliverability of sites in current adverse economic conditions

Development status	Contribution towards the deliverable supply of housing land	Justification / assumptions
Sites where dwellings are under construction	All sites are considered deliverable and will contribute towards the supply of housing in Years 1-5. Apply half the completion rate set out in paragraph 5.22 of the EHMA SHLAA Methodology, or substitute with current ('actual') information.	Finances are already in place for the development of the site and there is a business case to complete construction in order to secure a return on the investment. Therefore it is likely that the site will continue to be built out. The build out rate is reduced to reflect suppressed demand for housing due to mortgage restrictions / difficulty in borrowing (e.g. increased deposits, reduced loan to property value).
Sites where construction of dwellings has not yet started	<u>Discount sites of 15 dwellings or more</u> where current ('actual') information indicates the development will not commence in Years 1-5. All other sites are likely to be deliverable and contribute towards the supply of housing in Years 1-5; but Defer commencement by one year and apply half the completion rate set out in paragraph 5.22 of the EHMA SHLAA Methodology, or substitute with current ('actual') information.	Due to current adverse economic conditions, there are likely to be difficulties arising for developers to secure finances for the development of the site and to sell completed dwellings. The impact of current market conditions may be most acute on sites with planning permission tied to S106 Agreements requiring the provision of affordable housing and/or financial contributions towards infrastructure and community facilities. However, sites subject to S106 Agreements are likely to contribute to the supply of housing in Years 1-5 where grant funding has been secured for affordable housing and/or where the terms of the S106 Agreement may be subject to re-negotiation pending resubmission of planning proposals or determination by the Local Planning Authority. For all other sites there is no substantive evidence in the EHMA that development will not take place within 5 years. The build out rate is reduced to reflect suppressed demand for housing due to mortgage restrictions / difficulty in borrowing (e.g. increased deposits, reduced loan to property value).

Note: Current ('actual') information could include advice from: the developer, local authority Housing Officer, local authority Development Management Team or SHLAA key stakeholder Panel.

APPENDIX 3: Assessment of sites without planning permission

See separate document

APPENDIX 4: Schedules and housing trajectory

See separate document

APPENDIX 5: Self assessment of SHLAA soundness

Paragraph 14 of the *CLG Practice Guidance* identifies certain minimum core outputs and process requirements for a SHLAA. These two elements form the basis of the Council's self assessment of the 2010 Exeter SHLAA, in terms of demonstrating compliance with the requirements of *PPS3*.

Figure 1: Core outputs of SHLAA

1	A list of sites, cross referenced to maps showing locations and boundaries of specific sites (and showing broad locations where necessary).	Yes A list of sites without planning permission at 1 November 2010, cross-referenced to maps, is provided in Appendix 3. A list of sites with planning permission/permission subject to S106 Agreement at 1 November 2010 is provided in Appendix 4. Maps of each site are not included in the SHLAA, as there are a large number. However, maps showing the location of all these sites are provided in the Council's publication entitled <i>Housing Planning Permissions and Completions</i> (2010). Details of the broad locations for growth, including plans, are included within the SHLAA report (paragraphs 7.23 - 7.39).
2	Assessment of the deliverability / developability of each identified site (i.e. in terms of suitability, availability and achievability) to determine whether an identified site is realistically expected to be developed.	Yes Each identified site has been assessed for suitability, availability and achievability in accordance with the definitions set out in paragraph 54 of PPS3, stages 7a, 7b and 7c of the <i>CLG Practice Guidance</i> and the <i>SHLAA Methodology</i>.
3	Potential quantity of housing that could be delivered on each identified site or within each broad location (where necessary) or on windfall sites (where justified).	Yes Information for sites without planning permission at 1 November 2010 can be found in Appendix 3. Information for sites with planning permission/permission subject to S106 Agreement at 1 November 2010 can be found in Appendix 4. Information for the broad locations for growth can be found in the SHLAA report (paragraphs 7.23 – 7.39).
4	Constraints on the delivery of identified sites.	Yes Information for sites without planning permission at 1 November 2010 can be found in Appendix 3.
5	Recommendation on how these could be overcome and when.	Yes Information for sites without planning permission at 1 November 2010 can be found in Appendix 3.

Figure 2: Process checklist for SHLAA

1	The survey and assessment process should involve key stakeholders including house builders, social landlords, local property agents and local communities.	Yes Landowners, agents, developers, architects, registered social landlords, housing authorities and other organisations with an interest in local housing delivery have all been involved in the development of the <i>SHLAA Methodology</i> and in the submission and assessment of
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		sites. A 'call for sites' was publicised through a public notice in the local press in July 2010. The call was published on the Council's website and individual letters were sent to LDF consultees. The Council, in line with the other local authorities in the Exeter HMA, has used a Panel to assess the sites in terms of their suitability, availability and achievability, in accordance with the <i>SHLAA Methodology</i>. A list of Panel members is provided at Appendix 1.
2	The methods, assumptions, judgements and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the SHLAA report. The report should include an explanation as to why particular sites or areas have been excluded from the SHLAA.	Yes. The <i>SHLAA Methodology</i> used to produce the SHLAA has been prepared by the partner authorities of the Exeter HMA and was subject to wide ranging public consultation. The Methodology has been informed by comments received from that consultation. The SHLAA Panel also commented on the draft <i>Methodology</i> before it was finalised by the partner local authorities. The SHLAA gives clear reasons why sites have been excluded from the assessment.