

HBF response to Exeter Local Plan Examination MIQs- Matter 13 – Design, Health and Wellbeing

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

Issue 1 – Design and Advertisements – Policies D1, D2 and D3

Q1. Is it sufficiently clear what is meant by ‘appropriate densities, massing and building heights’ and ‘reinstate former street patterns’ for the purposes of Policy D1? How will these elements of the policy be implemented and how will it be effective in these regards?

HBF support the need for well-designed schemes and highlight the ongoing national work around design. The policy does not define what is meant by appropriate density, massing and building heights, and this needs to be considered on site specific basis. Similarly, the reinstatement of former street patterns may not be appropriate in all cases, especially when there are so many other policy demands and requirements that need to be included within a scheme including the greater land-take implications of the new SUDs guidance and the delivery of on-site BNG requirements.

As we said in our Reg 19 response, we suggest the Plan need to give more thought to how the Design policies interact with the Council's aspirations for brownfield first, higher density development in Exeter and whether this realistic, deliverable and viable. We remain concerned how everything being asked for can be achieved in a way that delivers good design and other policy requirements, such as BNG and public open space, whilst ensuring development remains viable. We also note that the publication of the long-awaited Future Homes Standard will also have impacts on design, for example the need for photovoltaics on the roof may impact orientation, the need for consideration of shading etc .

Q2. Is it sufficiently clear to users of the Plan what a comprehensive response to existing site constraints, utilities and infrastructure provision would entail?

No, and again this need to be considered in the wider context of all the Plan policies. Design policies should also not restrict design and innovation.

Q3. Do all developments need to provide high quality public realm and landscape design, making appropriate provision for public art and cultural activity as an integral part of the proposal?

Any requirement needs to be proportionate. Not all factors would be relevant to all applications.

Q4. Is Policy D1 effective and justified by including references to supplementary planning documents and guidance?

No. It is not appropriate and contrary to national guidance to seek to give Local Plan policy status to SPDs. Planning policy must be made through the Local Plan process and be subject to the requirements for public consultation and independent scrutiny through the Examination process. Any reference to SPDs should be in the supporting text and it should be noted SPD will age and become out-of-date as new ones cannot be adopted beyond June 2026.

Q5. Are policies D1, D2 and D3 positively prepared, justified, effective and consistent with national planning policy?

HBF suggest reference should be made to the national design code and other ongoing work on design nationally, although this could be in the text and not the policy.

Q6. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

HBF are concerned about Local Plan policies giving weight to documents prepared by other organisations, as these will date and changes over the course of the Plan. If an additional criterion about soils is needed, we suggest the reference to DEFRA Guidance on soils should be in the supporting text.

Issue 2 – Health, Wellbeing, the Environment and Pollution - Policies HW1 and HW2

Q1. Is Policy HW1 justified, effective and consistent with paragraph 96 of the Framework, which requires planning policies to aim to achieve healthy, inclusive and safe places?

HBF reiterate the concerns in our reg 19 response that any HIA requirements must be proportionate.

Q2. Would a separate Health Impact Assessment be necessary for all site allocations? If so, would this requirement consistent with Public Health England Guidance which advises that health impact assessments are a useful tool to use where there are expected to be significant impacts?

As we have said any requirements need to be proportionate. In other Plans we have seen reference is made to a HIA screening report, and then a full HIA only being required where there is a significant impact.

Q3. Is it sufficiently clear what is meant by 'large scale development' for the purposes of Policy HW1? How will the policy be implemented and how will it be effective in this regard?

No. Further clarity is needed on this definition especially as the Government is intending to introduce a new category of medium size sites. HBF suggest it would be helpful for the effectiveness of the Plan to consider the impact of this new designation on all the policies in the Local Plan.

Q4. Is Policy HW1 sufficiently clear how any potential adverse health and wellbeing impacts from residential or other development that is not 'large scale' would be dealt with? Is the policy effective in this regard?

This is not clear. Any requirements for HIA should be proportionate, and a full HIA report seems unduly burdensome for small scale development which have both limited health impacts and limited opportunities to address these impacts within the development scheme.

Q5. Is the evidence to support contributions towards GP provision sufficiently robust to ensure it meets the tests for planning obligations?

The policy wording should make it clear that an assessment of any s106 contributions required will be undertaken at the planning application stage to ensure any request comply with the CIL tests and are informed by the latest information

Q6. How has access to secondary healthcare been considered? Would any secondary healthcare contributions also be required?

Any request for s106 contributions must be scrutinised at the planning application stage to ensure any request complies with the CIL tests and are informed by the latest information.

HBF note concerns about request for secondary healthcare contributions where these have not been supported by robust evidence. Elsewhere in the country request for s106 have been refused as secondary healthcare should be funded through general taxation and healthcare boards in planning for their hospitals and other secondary care, should already be taking housing growth into account in their plans.

Q7. Is criterion e) of Policy HW1 necessary? Is this element already covered by Policy D2?

This seems repetitive and unnecessary as the plan should be read as a whole.

Q8. Are the requirements set out in policies HW1 and HW2 justified, consistent with national planning policy and based on robust, up to date evidence?

Any request for s106 contributions must be scrutinised at the planning application stage to ensure any request complies with the CIL tests and are informed by the latest information. The Plan should explain this is the policy and/or the supporting text.

Have these requirements been adequately tested to ensure that they are viable and deliverable? How will they be funded?

HBF are concerned about the robustness of the evidence used to request s106 contributions and the cumulative impact of all the policy requirements and contributions being sought on both the viability and deliverability of new development.

Q9. Are policies HW1 and HW2 positively prepared, justified, effective and consistent with national planning policy?

Any request for s106 contributions must be scrutinised at the planning application stage to ensure any request complies with the CIL tests and are informed by the latest information.

Q10. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Further Main Modifications are needed to make these policies proportionate and sound.