



HBF response to Exeter Local Plan Examination MIQs- Matter 5 – Housing Land Supply

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 – Total Housing Land Supply

Q1. Is there convincing evidence to demonstrate that the Plan's housing requirement to the end of the plan period will be met?

HBF are concerned that the evidence is not convincing about this and further sites need to be allocated. In addition, we do not believe the Monitoring Framework is strong enough in stating what the Council would do if monitoring showed a history of under-delivery of housing. Our comments in response to the MIQs on Matter 14 provide more details on this point.

Q2. Is there convincing evidence to demonstrate that there is a reasonable prospect of a five-year supply of deliverable land for housing being maintained throughout the plan period?

HBF are unclear of the answer to this, as we believe the Council should have considered setting a higher total higher requirement, and therefore a higher annual figure, and 5 YLS requirement. The housing trajectory on page 168 of the plans shows windfalls beginning in 2025/26 which is unrealistic. HBF would request that any windfall allowance should not be included within the first three years of adoption of the Plan as these sites would already need to have permission in order to be completed within this time frame.

Q3. What are the implications of the proposed revision of the plan period on overall housing supply?

If the Plan period is extended, as HBF believe it should be, then the housing requirement will need to increase by another year. As we have previously set out HBF support a higher annual housing requirement, so we would argue the additional year should also be at this higher annual level.

Q4. What proportion of the total housing supply is derived from purpose-built student accommodation? Is the Plan over-reliant on the provision of this type of accommodation to meet the housing requirement?

HBF are concerned that the Plan should provide for a range of sites to meet the range of housing needs facing Exeter this includes the need for affordable housing and family homes. We continue to believe that the Plan should be doing more to promote a range of housing types and

tenures, on a range of small, medium and larger sites including both greenfield and brownfield sites.

Q5. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?

HBF question the evidence that supports the windfall allowance for this Plan, particularly in light of the viability challenges facing brownfield development. We also believe that any windfall allowance should not apply to the first three years post adoption as these sites would already need to be known and in for planning in order to make a contribution in this timeframe.

Q6. Paragraph 70 of the Framework sets out that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise (SME) housebuilders to deliver new homes and are often built out relatively quickly. How are SME housebuilders supported in the plan?

HBF agree more needs to be done to support SME building this should include the allocation of more sites, including small and medium sites, and greenfield sites.

Q7. How has the limited capacity of the existing power grid network in Exeter been considered? Does this have any impact on the total housing supply?

The Infrastructure Delivery Plan should have fed into the Plan and informed the whole plan viability assessment and consideration of the deliverability of this Plan.

Q8. In terms of this issue, are any of the other suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

HBF do not believe the changes suggested by the Council address our concerns. We would reiterate our request for changes of the housing requirement, the Plan period and the windfall allowance.

Issue 2 - Five-Year Housing Land Supply

Q1. What is the five-year housing land requirement?

As we have set out in our responses, HBF supports a higher requirement over the plan period, which would mean a higher dpa figure and a higher 5 Year Land Supply Figure.

Q2. Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

This is not clear from the housing trajectory. We also believe any allowance for windfall should only be allowed after 3 years which would also reduce the amount of housing this Plan can deliver in the first five years.

Q3. What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

It is essential that the Council has confidence in the viability and deliverability of the site allocated in the Plan. HBF note this will require working closely with developers and site promoters.

Q4. Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

HBF agree that it will be important for the site allocated to be deliverable. In order to understand this on a site by site basis will require the Council to work closely with developers and site promoters to understand individual site issues. As a more general point we would highlight the ongoing impacts of increasing regulation and bureaucracy on housing development and the challenges currently facing the housing building industry and housing market.

Q5. Is there convincing evidence to demonstrate that there will be a five-year supply of deliverable land for housing following adoption of the plan with an appropriate buffer applied?

See response to Question 1-4 above.

In relation to the buffer HBF would request a greater buffer is applied because of the challenges facing viability and to provide for a range and choice of sites.

Q6. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 72 of the Framework?

HBF have expressed our concerns about windfall allowance HBF considers it is important that the Council ensures that they have the appropriate evidence to support this windfall allowance, this should not just be based on past delivery, it needs to demonstrate that this trend will continue into the future. HBF also considers that by including windfalls within the Plan's housing requirement, the opportunity for windfalls to provide some additional flexibility in the housing land supply is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations.

HBF is of the view that any allowance for windfall should not be included until the fourth year of a housing trajectory, given the likelihood that dwellings being completed within the next three years will already be known about (as they are likely to need to have already received planning permission to be completed within that timeframe).

Q7. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

HBF are concerned that as the annual housing requirement needs to be higher and the windfall allowance over the Plan period should be lower, there is therefore not currently a 5YLS for this Plan.

Q8. What flexibility does the Plan provide if some of the larger sites, such as Water Lane, do not come forward in the timescales envisaged?

HBF have made details comments about the need for a more effective monitoring framework, in our Reg 19 response and in our MIQ response to Matter 14. We argue that the Plan needs to more clearly set out what actions the Council will take in the case of under-delivery of housing. this would include a slower than intended build-out rate of currently allocated sites, especially if they are already facing, or are likely to face viability issues. A policy which simply requires a new Plan to be prepared does not address these issues.

Q9. What are the implications of the proposed revision of the plan period on the five-year housing land supply?

See response to questions about and HBF response to Matter One.

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

In our view the housing trajectory table needs updating and additional sites adding in. Also, the diagram on page 168 need amending to remove the element of windfall from the first three years post-adoption of the Plan.