



HBF response to Exeter Local Plan Examination MIQs- Matter 7 – Meeting Housing Needs

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 – Affordable Housing – Policy H4

Q1. How will affordable housing be delivered on brownfield land as a result of Policy H4? Does this approach reflect the evidence in the Local Plan Viability Assessment and its Addendum?

HBF are concerned that the evidence suggests affordable housing will be very difficult to deliver especially in light of the other challenges facing the deliverability and viability of housing we have detailed elsewhere in our representations.

Q2. How have the requirements for affordable housing on brownfield land been established as part of the plan-making process? Are they justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

HBF are concerned that the Whole Plan viability evidence suggests affordable housing will be difficult to deliver, and this evidence in itself underestimates the current challenges facing house builders and the impact this has on the viability and deliverability of the Exeter Local Plan.

Q3. Should the requirements for affordable housing on brownfield land also apply to greenfield land? Is the policy sufficiently flexible in this regard to be effective?

HBF note that SSM29 seeks to clarify that the targets apply to greenfield and brownfield sites. HBF however are still concerned about the level of affordable housing being sought and the tenure split. We continue to request more flexibility within the affordable housing policy. In other areas we are seeing Councils agreeing to cascade mechanisms for affordable housing as they are proving to be essential for housing delivery to continue. The Govt are currently encouraging cascades for s106 that have already been signed where units will be completed by 1st Dec 2027 (see the Written Ministerial Statement)

Q4. Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?

HBF remain concerned that the evidence supporting this Plan suggests that not enough affordable housing will be delivered in Exeter, and as such a higher housing requirement is needed.

Q5. What are the viability implications of the preference for 30% for all first homes that meet the affordable home ownership requirement to be sold at a 50% market price discount?

HBF are surprised to see First Homes retained within the Exeter Plan as this is no longer the Government's preferred way of delivering affordable housing. We would have expected the viability assessment and the Plan to have been updated to reflect this change. We also note that many HBF members are experiencing difficulty in securing Housing Associations for s106 units. The Government's establishment of a clearing house is demonstration of their wish to see action in this area. HBF remains concerned that the inflexibility of current policy wording may hamper the delivery of affordable homes, and housing in general.

Q6. What would constitute the 'exceptional circumstances' to enable off site delivery of affordable housing?

As set out in our response, there are many reasons including site specific circumstances, management challenges or a lack of Housing Association interest that make mean off-site delivery of affordable housing appropriate or for a cash contribution to be paid in lieu. The Government has acknowledged the challenges created by a lack of Housing Association interest in some s106 units. They have established a clearing house to try and help address this. Even with this in place HBF members are still facing challenges with this issue and HBF suggest allowing a cascade mechanism should be another options to enable affordable housing to be delivered on-site.

Q7. For soundness, is it necessary for affordable housing delivery to be shown in the trajectory?

HBF would support this inclusion. It is essential for the monitoring and effectiveness of the Plan to understand the reasons for any under-delivery of housing. As highlighted above some HBF members are experiencing delays in bringing forward housing scheme due to a lack of Housing Association interest, reflecting the challenges facing the Housing Association sector including funding, the need to invest in existing stock and management challenges facing dispersed properties.

Q8. What is the justification for the suggested modifications to Policy H4? Why are they necessary for soundness?

HBF suggest greater flexibility is needed in the wording of the policy.

Issue 3 – Custom and Self-Build Housing – Policy H7

Q1. What is the identified need for self-build and custom housebuilding in Exeter? How did the Council identify this need, and will it be met over the Plan period?

HBF have significant concerns about the robustness of the evidence base supporting self-build nationally, as anyone can register an interest anywhere, and can so regardless of the whether or not there is a realistic prospect they could afford or access finance to secure it. The robustness of the evidence provided by a Council's self-build register is therefore subject to question. In light of this challenge it is essential that the Council actively monitor the delivery of any self-

plots and adopt a flexible approach to allow for changes to any self-build plots that remain unsold within a reasonable timeframe.

Q3. How many self or custom build homes will be delivered in Exeter given the minimum density of 50 dwellings per hectare recommended by the Exeter Density Study?

HBF are concerned that the approach to delivery self-build on allocated sites is flawed, similarly we are concerned that the aspiration of people looking for a self-build may not be for high density urban living.

Q4. Are the requirements set out in Policy H7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

HBF consider it unlikely that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.

If any policy requirement for self-build is included then the policy approach has to be realistic to ensure that where self and custom build plots are provided, they are delivered and do not remain unsold. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. The Council should consider the application of a non-implementation rate to its HLS calculations.

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

Issue 5 – Residential Accommodation, Amenity and Healthy Homes – Policies H13 and H16

Q2. What is the justification for the requirement for Nationally Described Space standards in Policy H16?

HBF have provided a detailed response to this question in our Reg 19 response. These are not repeated here.

Q3. Are Policies H13 and H16 positively prepared, justified, effective and where relevant, consistent with national planning policy?

In relation to policy H16, see Response to Q1 above

Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

See Response to Q1 above

Issue 6 – Accessible Homes – Policy H14

Q1. How has the requirement that 10% of affordable homes should be built to meet wheelchair user and accessible and adaptable standards, as set out in Policy H14, been established as part of the plan-making process? Is it based on robust, up to date evidence?

Q2. Based on the number of housing sites allocated in the Local Plan (without planning permission) how many wheelchair adaptable dwellings are expected to be provided? How does this compare to the identified need?

HBF have provided a detailed response to this question in our Reg 19 response. These are not repeated here.

Q3. What is the justification for the thresholds in Policy H14 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?

See Response to Q1 above

Q4. Does Policy H14 consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, as required by the PPG12?

See our Reg 19 response comments. They are not repeated here

Q5. What is the justification for the suggested modifications to Policy H14? Why are they necessary for soundness?

HBF suggest further modifications are needed for this policy to be made sound.

Issue 7 - Housing Density and Mix – Policy H15

Q1. Is Policy H15 sufficiently clear in relation to the types of housing to be provided and the housing mix expected? Is it effective in these regards?

See response to Q4 and Q5 below

10.The Exeter Density Study¹³ recommends densities between 50 and 150 dwellings per hectare for residential development depending on locational and other 'drivers of density' such as increasing the population within the city centre and proximity to public transport nodes and strategic cycle routes.

Q2. What are the implications of this drive towards higher densities in Exeter? Would this approach lead to more tall buildings within the city? If so, should the Plan include a tall buildings policy? How has the Exeter Skyline Study been considered in formulating this approach?

HBF are concerned about the Council's reliance on housing delivery at such high densities, despite obvious issue around viability and deliverability, as set out in our Reg 19 response. remain.

HBF remain concerned that the deliverability of high and super high density residential development in Exeter will be dependent upon the viability of brownfield sites and the demand for high density city centre living post Grenfell and post Covid-19. It is important that delivery of the housing requirement in Exeter does not rely overly ambitious and unrealistic intensification of dwellings within the City, that results in any under-provision and/or under delivery of housing numbers, or fails to meet the full range of housing needed.

Q3. Is Policy H15 sufficiently clear in relation to what is expected of the density of development and what the implications of higher densities could potentially be? Should it include a minimum density standard for city and town centres and other locations that are well served by public transport as per paragraph 129 of the Framework?

See response to Q4 below

Q4. Is the delivery of Policy H15 over-reliant on the provision of flatted accommodation? How much of this type of accommodation been delivered in the city in the last five to ten years?

As we have set out elsewhere HBF have concerns that this plan will not deliver the range of housing needed, including in particular family homes. The policy also does not provide guidance on how a developer would show compliance with the policy. It is more usual for policy to include a target dph and then flexibility within the policy to account for local circumstances.

Q5. Is Policy H15 positively prepared, justified, effective and consistent with national planning policy?

HBF provided detailed comment about density in our Reg 19 response. We also note the Dec 2025 NPPF consultation sets out the Government wishes to minimise Councils specifying the kind of open market housing provision, leaving this to the developers to decide in light of local market conditions.

Q6. What is the justification for the suggested modifications to Policy H15? Why are they necessary for soundness?

HBF suggest wider changes are needed to the Plan to ensure housing that meet all the City's needs is provided.