

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 7 (Meeting Housing Needs)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



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?

1. TT Group are in general support of the delivery of affordable housing subject to specific site viability. Viability evidence within the Local Plan Viability Assessment and its Addendum supports the 15% affordable requirement, however it should be noted that at higher benchmark land values the viability is weaker for flatted schemes of 15 dwellings or fewer. Viability should therefore be considered on a site by site basis.

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?

2. As noted, TT Group are in general support of the delivery of affordable housing. However, while the proportion of affordable housing on brownfield sites is broadly supported subject to specific site viability, we have concerns about the lack of clear evidence supporting the tenure split of 50% social rent and 50% affordable home ownership. The Exeter Local Housing Needs Assessment 2024 suggests that around 47% of those in need of affordable housing aspire to home ownership, however this does not directly translate to demand for said tenure. We would suggest that the policy be reworded so that this split is a starting point, and that up to date site specific evidence in relation to need and viability should be taken into account when determining the appropriate tenure split on a site.

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

3. The suggested modifications SMM29 and SMM30 are both required to align the policy with the evidence set out in the Exeter Local Housing Needs Assessment 2024, which is currently the most up to date evidence of affordable housing need.

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 7 (Meeting Housing Needs)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



Issue 2 – Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12

Q4 What is the justification for the locational requirements for purpose-built student accommodation in Policy H10?

4. As set out in the previous representations, TT Group support the principle of purpose built student accommodation (PBSA) being focused in central locations. Furthermore, PBSA should be included within specific allocations as it can, particularly where part of mixed use schemes ensure the viability and deliverability of schemes in the city centre.

Q11 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

5. We have no specific comment on this point.

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

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?

6. Further to our previous representations, we continue to have strong concerns about the requirements set out in this Policy. While there is evidence of demand for self-build housing within the Exeter Local Housing Need Assessment 2024, this does not in of itself justify a blanket policy of 5% self-build plots on sites of 20 dwellings or more. Self-build requirements should reflect both specific locational demand (it is unclear how this is captured within the self-build register) and also feasibility in relation to specific schemes.

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 7 (Meeting Housing Needs)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



-
7. As previously noted, there is a fundamental conflict between the accommodation of self-build plots and the focus on higher density brownfield development in and near the city centre on which the spatial strategy is predicated. The majority of sites within or in proximity to the city centre, such as Exbridge House, would not be suitable for self-build. Furthermore, given the need for many city centre developments to be flatted in order to achieve appropriate density and make best use of the land, it would be highly impractical for self-build to be required on said sites.
8. Therefore, we again strongly recommend this entire policy is reconsidered.

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

9. We generally support modifications SMM34 to SMM36 for bringing needed clarity to this policy, however we continue to strongly oppose the basis of the policy itself.

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?

10. As set out in previous representations, TT Group support the inclusion of a policy requiring accessible dwellings where there is evidence of need. However, we object to the current draft wording because its requirements are not justified by the available evidence. National policy—including the Written Ministerial Statement (25 March 2015), Planning Practice Guidance, and the NPPF (December 2024)—is clear that optional technical standards such as M4(2) and M4(3) can only be applied where there is a demonstrable need. This sets a high bar that goes beyond the Council simply considering increased provision desirable.

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 7 (Meeting Housing Needs)

Prepared by Savills on behalf of TT Group (respondent reference numbers: C-40)



11. While the Local Housing Needs Assessment (December 2024) assesses potential need for adaptable and accessible homes, Section 7 does not justify requiring all market and affordable housing to meet M4(2), nor requiring 10% of affordable homes to meet M4(3). Any such requirements must be supported by clear evidence. The draft policy should also recognise that site-specific factors—such as topography or the feasibility of lifts in apartment buildings—may make meeting these targets impractical or impossible, and that this should not render a development unacceptable.

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?

12. As noted above, these thresholds are not justified by evidence.

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

13. The suggested modifications are not justified as they are not supported by evidence requiring at least 10% of affordable homes to meet M4(3).