



HBF response to Exeter Local Plan Examination MIQs- Matter 6 – Energy, Climate Change and Flooding

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 – Net Zero, Low Carbon Energy, Renewable Energy and Local Energy Networks – Policies CC1, CC2, CC3, CC4, CC5 and CC6

Q1. Is it sufficiently clear what is meant by ‘net zero’ for the purposes of Policy CC1? How will the policy be implemented and how will it be effective?

No. The policy sets out the City Council’s ambition to be net zero by 2030. It is not clear from the wording of the policy if this means each development has to be net zero or if a developer is to show how its development can contribute towards this wider aim for the City of Exeter. The policy wording has criteria that refers to maximising some things, minimising others, and considering and applying other criteria. This does not set out clear standards that needs to be achieved and as such it is unclear how a developer would show compliance with this policy. This means it is unclear how the policy be implemented and how will it be effective.

However, HBF continue to have wider concerns about the plethora and range of policies in local plans which are seeking to adding local diversity to national standards, and in doing so may end up undermining the very benefits they are seeking to secure. This additional complexity will further the deliverability and viability of new development especially when considered cumulatively, which the other policy requirements and requests for s106 and CIL payments.

As we set out in our Reg 18 and Reg 19 response HBF have provided details comments about our concerns in relation to the proliferation of different climate change policies and standards within Local Plans. Although HBF recognise the role that house builders have to play in helping to minimise and mitigate climate change, we remain concerned that the Council seeking to introduce local policies that seek to go above and beyond Building Regulations.

We note that the Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b.

HBF would suggest this strongly supports our views that the scope and content of the Climate Change policies in this Plan are largely unnecessary. We also note that the Dec 2025 draft NPPF proposals clearly set out that the Government view is that Local Policies which conflict with the

new NPPF will not be able to be taken into account in decision-making once the new NPPF is in place. This seems to add further weight to our concerns about the approach to climate change policies in this Plan.

Although the policy is clear in saying a Net Zero Statement will need to be included with a planning application, but it does not provide the necessary detail on what needs to be included within such a Statement, or the standards a development should be showing it is complying with. HBF continue to view this policy as unnecessary as this issue should be addressed through Building Regulations and other national policy.

Q2. Does Policy CC1 apply to all development? Are the requirements set out in Policy CC1 justified, effective and consistent with national planning policy? Have these requirements been adequately tested to ensure that they are viable and deliverable?

It is unclear if the policy applies to all development. In addition to our Reg 19 response, and comments in response to Q1 above, HBF would also note that the whole plan viability assessment suggest viability challenges facing development in Exeter. We have flagged our concerns with the viability assessment elsewhere in our Reg 19 response and Hearing Statement in response to MIQs about Matter 14, and these are not repeated here. We remain concerned about the additional time that would be taken addressing local variations of what should be national standards. If the policy is to be retained it must be proportionate, but HBF continue to believe it is unnecessary for the reasons previously stated.

Q3. Should Policy CC1 acknowledge that targets will be dictated by national policy and up to date building regulations, rather than local policy?

Yes. HBF believe this issue should be left to national policy and up to date Building Regulations. The Government remains committed to bringing in the Future Homes Standards and the delays that have been experienced indicate how complex an issue this is to address through a realistic timetable developed in partnership with industry. This further underlines our view that this national issue should be dealt with nationally and as such does not need to be set out in a policy in any Local Plan.

Q6. Policy CC3 requires all new development with a floorspace of at least 1,000 square metres or comprising ten or more homes and located in certain areas, to have heating system that are compatible with either a proposed or existing local energy network. What is the justification for this approach? Is the policy sufficiently flexible in this regard to be effective? Has this requirement been adequately tested to ensure that it is viable and deliverable?

No. Our Reg response sets out more detail about HBF concerns about any policies which mandate connections to district heating networks, and the note that 90% of current networks are gas-fired. As we have set out such policies can also negatively impact on consumers.

Q7. Is it clear to users of the Plan what measures all development proposals (excluding householder developments) need to include to allow for future connection to 'local energy networks' under Policy CC3? Will this be possible for all development types and locations?

No. This is not proportionate or justified. The proposed SMM3 seeks to support rather than require district heating networks in specified locations. This makes the policy requirements for all development to consider if it can connect to networks, which in some cases do not yet exist, even more unreasonable.

Q11. Do the minimum standards in Policy CC5 go beyond the relevant future Building Regulations and Future Homes Standard? If so, is there a well-reasoned and robustly costed rationale including in respect of development viability, housing supply and affordability? If Policy CC5 does not go beyond the future Building Regulations, why is the policy necessary?

HBF continues to support the Government's intention to set standards for energy efficiency through the Building Regulations and the Future Homes Standards. We remain of the view that the key to success is standardisation and this requires individual Councils not to specifying their own policy approach to energy efficiency, and this undermines economies of scale for product manufacturers, suppliers and developers. The draft Dec 2025 NPPF consultation clearly sets out the Government's intention to move to a more rules-based system and prevent the proliferation of Local Plan policies on matters that should be left to national regulations.

HBF remain of the view that this Plan does not need to set local energy efficiency standards, or reductions in carbon dioxide emissions, or a requirement for zero carbon homes in a Local Plan policy because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the Future Homes Standard. There is no need for the Plan to seek to provide a "local backup" to national policies.

Q12. Is Policy CC5 consistent with the national policy position towards achieving net zero and the expectations of the Government's Written Statement "Planning - Local Energy Efficiency Standards Update" made on 13 December 2023?

No. In HBF's there is no need for Exeter to set localised standards. The WMS strongly discourages local variation and this and the draft Dec NPPF sets out the Government view on this issue even more categorically.

Q13. Is it sufficiently clear what is meant by 'adequate steps' for the purposes of Policy CC6? How will the policy be implemented and how will it be effective? Is the policy sufficiently flexible to be effective?

HBF provided details comments on this policy in our Reg 19 response which are not repeated here. However, we also observe that the wording of the policy is unclear. Although it says a calculation of carbon emissions will be required it does not say what would be good enough to pass. This adds an further layer of discretion and debate which adds further delay to decision-making holding up much needed house-building. HBF continue to believe issues around carbon and climate change are bests addressed through national standards including the new Future Homes Standard.

Q15. Is it sufficiently clear what Policies CC1, CC2, CC3, CC4, CC5 and CC6 require from decision-makers and developers? Have the requirements been adequately tested to ensure that they are viable and deliverable?

No. As detailed above HBF continue to have concerns about the plethora of climate change policies being proposed in the Exeter Plan and that they are adding complexity and local diversity to what should be national standards. In doing so the Plan may end up undermining the very benefits it is seeking to secure. This additional complexity will further the deliverability and viability challenges of new development in Exeter, especially when considered cumulatively with the other policy requirements and requests for s106 and CIL payments.

Q16. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

Although we agree that the Plan will not be adopted until 2027, we do not support the suggested changes to the policies as they are not needed because in our view the policies themselves are not needed.

Issue 2 - Climate Resilience, Flood Risk and Drainage – Policies CC7, CC8 and CC9

Q1. Will Policy CC7 provide an effective framework for climate change resilience in new development? Is it sufficiently clear how plan users should respond to the policy requirements?

No. Again as we said in our Reg 19 comments HBF do not consider that this policy is necessary. This issue is already covered elsewhere in the Plan, by Building Regulations and by other legislation.

Q3. Policy CC9 requires all new development to achieve a minimum estimated water use of not more than 110 litres per person per day. What is the justification for this approach? Is it consistent with national planning policy and based on robust, up to date evidence?

HBF have seen no specific evidence that justifies this policy applying in Exeter. We continue to believe this matter should be addressed through Building Regulations.

Q4. Has this requirement been adequately tested to ensure that it is viable and deliverable? How would this requirement be effectively implemented and monitored? Is the policy sufficiently flexible in this regard to be effective?

No. As set out in our response to Question 2 of Issue 1, and our response to Matter 14, HBF remains concerned about the cumulative impacts of these policies on the viability and deliverability of scheme.

Q5. Is it sufficiently clear what Policies CC7, CC8 and CC9 require from decision-makers and developers? Have the requirements been adequately tested to ensure that they are viable and deliverable?

No. These policies seek to require developers to undertake additional work, but it remains unclear what the standard any development is required to meet is. As detailed earlier in this response HBF remains concerned about the cumulative impacts of all the policy requirements on the viability of development and the deliverability of this Plan. If the policies which go beyond Building Regulations are retained then greater flexibility is needed in implementation of them to ensure that schemes remain viable.

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

We also note that Government has recently provided updated guidance on managing flood risk. It will be important that the Exeter Local Plan reflects this current guidance.