



HBF response to Exeter Local Plan Examination MIQs- Matter 3 – Spatial Strategy and Distribution of Development

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 – Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2

Q2. Is the strategic approach of focussing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?

Although HBF do not comment on individual allocations. We would expect the Plan to set out a range of allocations on a full range of sites. Our Reg 19 response and MIQ response to Matters 1 and 2 provide more detail about our concerns. The viability implications of the chosen strategy on viability are also addressed in our Matter 14 response. In summary we believe further housing allocations, including on greenfield sites are needed.

Q4. Does the distribution of development from allocations, commitments and completions since the start of the plan period reflect the overall spatial strategy set out in Policies S1 and S2?

HBF do not comment on individual sites but our Reg 19 response and MIQ response to Matters 1 and 2 provide more detail about our concerns about the Plan period. This will have implications for housing delivery within the Plan.

Q7. Have Policies S1 and S2 been included within the Local Plan Viability Assessment and tested to ensure that they are viable and deliverable?

HBF have significant concerns about viability. As we have said elsewhere Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Flexibility should be included within the individual policies in the Exeter Local Plan because whole plan viability assessments use methodologies that test typologies of sites, which do not consider the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or values of a specific site fall outside the parameters used of a typology that was tested. Some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. Therefore, the policy needs flexibility to ensure it is justified and effective, and the Plan is deliverable.

HBF remain concerned about the inadequacies of the whole plan viability appraisal, our concerns are details further in our Reg 19 response and our MIQ response to Matter 14. The challenges of viability make it less likely that affordable housing will be provided, especially as CIL and 10% BNG are non-negotiable. The cumulative impacts of the numerous policies that seek to go above and beyond Building Regulations and other policies further undermine viability and will impact on the ability of the Exeter Plan to deliver affordable housing.

Q9. Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?

We have set out our concerns about the need for higher housing allocations and how this link to the SA in our response to Matter. These are not repeated here. We note again that more sites would require more SA work and reiterate our disappointment that the Council appear to have given no consideration to the implications of the housing crisis and the need for Exeter to do its part in increasing housing numbers to help deliver 1.5 million homes within this Parliament. In our views these remain critical factors that should be informing plan-making.

Issue 2 – Employment Growth – Policy EJ1

Q2. How does the projected number of jobs compare to the supply of employment land and housing land? Could the projected number of new jobs (and thus homes and employment land needed) be higher?

As we set out in our Reg 19 response and our response to Matter 1 and 2, HBF support a higher housing requirement in Exeter, in part to support economic growth in Exeter and the wider region.