



HBF response to Exeter Local Plan Examination MIQs- Matter 9 – Site Allocations

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 - Housing Allocations and Windfalls – Policy H2

Q1. Do the proposed residential site allocations incorporate all types of housing? What is the latest position regarding planning approvals and construction timeframes for these sites?

Although HBF does not comment on individual sites or allocations we would expect the Council produces a plan which can deliver against an appropriately set housing requirement. We would expect the Plan to provide for a sufficient number and range of sites to provide choice and competition in the market and enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. As we continue to support a higher housing requirement and as such additional housing allocations will be needed.

It is unclear if the allocations include specialist housing, such as older person's housing, continue care retirement communities, self-build and affordable housing.

We would request that such detail is included in the housing trajectory. This should be presented both in graph for showing dph per year over time and in a detailed site by site table. The information needs to be presented in this way to enable efficient and effective monitoring of housing delivery and enabled the identification of any particular problems holding up delivery, for example any issues relation to location, the type or mix of housing, and/or any brownfield/greenfield issues.

Q5. How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield sites like Water Lane? What differentiates Water Lane from Marsh Barton which was removed as a housing allocation to instead be a Regeneration Opportunity Area?

In relation to viability HBF have provided details comments in our Reg 19 response and in our Matter 14 MIQ Hearing statement. These are not repeated here. We would however flag the challenges that mandatory BNG has been creating for many brownfield sites across the country, especially where open mosaic habitat is present. We also note the requirement that on-site BNG is having on density, as land secured for on-site BNG is not available for development.

Although the DEFRA has clearly set its proposals to shift from a de minimus exception for mandatory national 10% BNG to one based on site size, with sites below 0.2 Ha exempted, further consultation on brownfield exemptions is still awaited as DEFRA and MHCLG recognise the challenges of delivering BNG (and other policy requirement) on the viability and deliverability of brownfield sites, particularly city centre regeneration ones.

Q6. How did the Exeter Skyline Study¹⁵ and Exeter Density Study¹⁶ inform the site selection process, especially for sites within the city centre? Did the removal of large housing allocations such as Marsh Barton have any implications in terms of density assumptions for the remaining residential allocations? If so, what is the justification for this approach?

Again, HBF do not comment on site allocations, but we would again highlight the wider issue of the implications of on-site national mandatory BNG on density.

Q7. Is the Exeter Plan's windfall allowance justified and supported by compelling evidence? How would housing development on unallocated sites outside of the urban area be dealt with? Is the policy sufficiently clear in this regard to be effective?

No. As set out in our Reg 19 response, HBF are concerned about the amount of windfall. Windfall sites do not give the same certainty for developers as allocations, and as such sites should be allocated wherever possible. Our concerns about this issue remain.

The draft Dec 2025 NPPF sets out the Government's clear expectation to allocate small and medium sites to support the SME house-building sector.

Q8. What is the justification for the suggested modifications to the supporting text to Policy H2? Why are they necessary for soundness?

We note that proposed modification SMM1 intends to change the wording about allocations from a specific number to an approximation. Although we recognise that flexibility is needed to enable the best scheme to be developed for a site, it is also noted that this does introduce further uncertainty as to housing numbers that will actually be delivered. This further underlines our suggestion that more sites are needed.

Issue 2 – Strategic Mixed Use Brownfield Allocations – Policies SBA1, SBA2, SBA3, SBA4 and SBA5

Q5. Is it realistic to expect self-build and custom-build homes to come forward at the densities proposed on each of the sites?

As we have said HBF do not comment on individual allocations but we would say that no, it is not realistic to expect self-build plots to be brought forward on these sites. We have provided comment on the self-build policy in our Reg 19 response to Policy H7, these are not repeated here but remain of concern.