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Dear Planning Policy Team,

### **EXETER LOCAL PLAN: OUTLINE DRAFT PLAN**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Exeter Plan Outline Draft consultation.
2. The 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.

#### **CE1: Net zero Exeter**

3. This policy states that Exeter has an ambition to be net zero by 2030 and requires development proposals to demonstrate how they will support this.
4. It is noted that this policy is setting a target ahead of the Government target of net Zero Carbon by 2050. The HBF does not generally object to encouragement for the need to minimise the need to travel, promote energy efficiency or support the use of renewable and low carbon energy. However, the HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable.

#### **CE2: Local Energy Networks**

5. This policy requires all new development of ten or more dwellings to be constructed to have heating systems compatible with the proposed or existing local energy network.
6. The HBF considers that energy networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost.



The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.

7. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water, so they are not for example benefitting from the energy price caps. The HBF considers that the Council should ensure that this policy is applied flexibly, and where alternative methods are considered more appropriate, sustainable or viable these should be permitted.

### **H1: Housing requirement**

8. This policy states that the Council will target the delivery of at least 650 dwellings per annum (dpa) between 2020 and 2040. It also sets out the potential sources of supply, including 2,024 completions, approximately 5,380 homes from planning permissions, 6,205 homes on site allocations and 691 homes on windfall sites.
9. The Exeter Local Housing Need Assessment (LHNA) 2022 identifies a local housing need (LHN) of 627 dwellings per annum (dpa). The NPPF<sup>1</sup> states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure<sup>2</sup>. The PPG<sup>3</sup> also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.
10. The HBF considers that the Council should review the housing requirement to ensure that it reflects the local housing need identified by the standard method and gives consideration to the circumstances where a higher figure would be appropriate. The HBF also considers that providing flexibility in the housing supply to ensure that the housing need is met is appropriate.

### **H2: Housing allocations**

11. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.
12. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery

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<sup>1</sup> NPPF 2021 Paragraph 61

<sup>2</sup> PPG ID:2a-004-20201216

<sup>3</sup> PPG ID: 2a-010-20201216

and sense checked by the Council based on local knowledge and historical empirical data.

13. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. Under the NPPF<sup>4</sup>, the Councils should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.
14. The Plan should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Council's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

#### **D1: Design principles**

15. This policy states that all development should incorporate principles outlined included in any adopted design related SPDs. The HBF has concerns in relation to the reference to an SPD, the HBF does not consider it appropriate to require a development to meet any future design SPD, as any requirements within this SPD will not have been tested and examined in the same way as the Local Plan and should not therefore be elevated to having the same weight as the development plan.

#### **Future Engagement**

16. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
17. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

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<sup>4</sup> Paragraph 69 NPPF 2021



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