



Devon County Council  
Strategic Planning  
Lucombe House (AB2)  
County Hall  
Topsham Road  
Exeter  
EX2 4QD

SENT BY E-MAIL AND POST

10th April 2017

Dear Sir / Madam

## **GREATER EXETER STRATEGIC PLAN (GESP) – ISSUES CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. 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. We would like to submit the following responses to specific questions in the Councils consultation document.

### **Question 1 : Do you have any comments on the content of the GESP and its relationship with other Plans?**

The HBF is fully supportive of the GESP which will provide a high level strategic planning policy framework for the constituent authorities of the sub-region. The HBF commends the five authorities of East Devon District Council, Exeter City Council, Mid Devon District Council, Teignbridge District Council and Devon County Council for coming together to prepare the GESP for the plan period up to 2040. As proposed the GESP will be a statutory document setting out the spatial strategy for the sub region and the level of housing and employment land needed up to 2040. It is proposed that the GESP includes strategic policies, development policies and strategic proposals as well as strategic allocations whilst the Local Plans include more localised policies and locations for smaller scale developments.

So that uncertainty and confusion are avoid there should be clarity between :-

- the GESP strategic and development policies and the localised policies in Local Plans ;
- the definition of strategic and small scale development ;
- the alignment of plan periods in the GESP and Local Plans. The currently adopted Local Plans cover different plan periods up to 2026 and 2033 ;
- the timescale for the preparation of the GESP and the programming of adopted Local Plan Reviews. The proposal for the review of Local Plans at least once every 5 years set out in the recently published Housing White Paper has implications for the co-ordination of the preparation of the GESP and the scheduling of Local Plan reviews. If adopted Local Plans are not reviewed until post adoption of the GESP then the Exeter Core Strategy (adopted in 2012), the Teignbridge Local Plan (adopted in 2014) and East Devon Local Plan (adopted in 2016) will be deemed out of date (more than 5 years old) in 2017, 2019 and 2021 respectively. The Mid Devon Core Strategy (adopted in 2007) is already out of date ;
- the basis for future 5 YHLS calculations and the housing delivery test.

**Question 2 : Do these reflect the issues you see facing Greater Exeter?**

The key housing issue is that the GESP makes adequate provision for the housing needs of the sub region. Presumably the GESP will be based on an up to date re-calculation of objectively assessed housing needs (OAHN) for the Greater Exeter Housing Market Area (HMA). It is most likely that this re-calculated OAHN will exceed the collective housing requirement of 2,500 dwellings per annum set out in the currently adopted Local Plans. The proposal for a standard methodology for the calculation of housing needs / requirements set out in the recently published Housing White Paper means that the re-calculation of OAHN will be undertaken using the Government's proposed standard methodology. The strategic allocations of the GESP together with the smaller scale development allocations in Local Plans should meet these housing needs in full over the plan period in order to address identified housing affordability issues.

**Question 3 : Is the draft vision appropriate for guiding the future of the Greater Exeter area up to 2040? If not what changes would you like to see?**

The GESP is proposed to provide a joined up vision so that housing needs are met in the right locations, economic growth and prosperity is secured and infrastructure to support sustainable growth is provided. However the proposed draft vision makes no reference to housing needs. It is suggested that the vision should be changed to include a statement on meeting housing needs.

**Question 4 : Have we missed anything?**

The HBF have no additions or changes to make to the proposed themes for the GESP which includes the quantity, cost, type, location and quality of housing.

**Question 5 : If we are to meet the area's needs for housing and employment what form of development do you feel best delivers our draft vision?**

Currently the focus for housing growth is Exeter and the new community at Cranbrook. It is acknowledged that urban extensions are a sustainable way to deliver housing however such locations alone will not meet OAHN in full nor sustain rural communities so development in other locations will also be needed. There are also risks associated with an over reliance on brownfield sites within the urban area. The artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing. It should be acknowledged that the availability of brownfield land will decline over time as it is a finite resource.

The HBF is supportive of a variety of options to accommodate anticipated housing growth including the more efficient use of land in Exeter, Sustainable Urban Extensions (SUEs), dispersed non-strategic scale development to sustain rural areas and new communities. A broad portfolio of sites will maximise housing delivery and ensure that the GESP is positively prepared, justified and effective. Therefore large strategic sites should be complimented with smaller scale non-strategic sites. When allocating sites the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. The recently published Housing White Paper also emphasises the importance of a wide range of sites because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The GESP should provide a contingency in its overall HLS. The planning in of some additional flexibility is necessary because not all land is developed and SUEs are developed over long periods of time often extending beyond plan periods. The HBF always recommends as large a contingency as possible (circa at least 20%) to the overall HLS to provide sufficient flexibility to respond rapidly to changing circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

**Question 6 : Are there any further comments you would like to make on the GESP?**

The GESP will be prepared in the context of proposals set out in the recently published Housing White Paper. There are a number of proposals which are of particular significance including :-

- the expectation for an up to date sufficiently ambitious plan which recognises and plans for homes that are needed starting from an honest assessment of the need for new homes ;
- the standard methodology for assessing housing needs ;
- the Statement of Common Ground setting out joint working between authorities to ensure difficult decisions are not ducked ;
- Local Plan reviews at least once every five years ;
- the introduction of the Housing Delivery Test ;
- the encouragement for a sufficiently wide range of sites to come forward to meet local housing requirements ;
- the inclusion of Starter Homes as a defined affordable housing tenure.

## **Conclusion**

It is hoped that these responses are helpful in informing the next stages of the GESP. If any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
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