



REVISED 2013
EXETER STRATEGIC HOUSING LAND
AVAILABILITY ASSESSMENT
(SHLAA)

MAIN REPORT

EXECUTIVE SUMMARY

A Strategic Housing Land Availability Assessment (SHLAA) is a key part of a local planning authority's evidence base on housing delivery. It aims to identify sites with potential for housing and assess when they could be developed. The assessment, which is undertaken with the help of an independent Panel, is part of the wider process of delivering sufficient new homes for local communities.

The Revised 2013 SHLAA presents an analysis of the potential for housing development of sites in Exeter (including sites with and without planning permission). It also includes a trajectory of potential housing supply over the remaining *Core Strategy* plan period (1 April 2014 to 31 March 2026). The Revised 2013 SHLAA represents an update of the 2013 SHLAA, which was published in February 2013.

The SHLAA does not make binding judgements on whether sites should be allocated for housing or whether planning permission is likely to be granted. The SHLAA helps to identify the most developable and deliverable sites for housing development. Any housing allocations will be dealt with through the *Development Delivery Development Plan Document (DPD)*, which is currently being drafted.

The Revised 2013 SHLAA concludes that Exeter has a five year supply of deliverable sites, in accordance with national guidance and the terms of National Indicator 159. It also concludes that there is sufficient deliverable and developable land in the City to meet the Core Strategy's target to deliver at least 12,000 new homes between 2006 and 2026.

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1 INTRODUCTION

What is a SHLAA?

- 1.1 Strategic Housing Land Availability Assessments (SHLAAs) were introduced in national planning guidance and are key components in the process of housing delivery. A SHLAA is a strategic assessment of the housing potential of specific brownfield and greenfield sites. SHLAAs are undertaken in partnership with key stakeholders in the housing field and require regular monitoring and updating.
- 1.2 The *National Planning Policy Framework (NPPF)*¹ advises (paragraph 47) that local planning authorities (LPAs), drawing on evidence from SHLAAs and other relevant evidence, should:
- identify annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land, or 20% where there has been a persistent record of under delivery of housing; and
 - identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, years 11-15;
 - make an allowance for windfall sites in the 5 year supply (and, it is therefore assumed, for the remainder of the plan period) if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a realistic source of supply.
- 1.3 To add detail to the advice on housing delivery, the Government published *SHLAA Practice Guidance*² (*CLG Guidance*) in July 2007. This guidance is still valid. The Planning Officers Society developed further guidance on how best to coordinate the preparation of SHLAAs with the Development Plan Document (DPD) preparation process. The guidance was published by the Planning Advisory Service in January 2008 and updated in July 2008 (*PAS Guidance*)³.
- 1.4 As part of the planned provision of housing, SHLAAs are an important part of the evidence base for preparing DPDs. The robustness of a SHLAA may be subject to scrutiny during the public examination of the relevant DPD. *CLG Guidance* notes that when the standard methodology is followed there should not be a need for a local planning authority to justify the approach taken in preparing its SHLAA, including at independent examination.
- 1.5 The 2009 and 2010 Exeter SHLAAs form part of the evidence base of the *Exeter Core Strategy*, which sets out the vision, objectives and strategy for the spatial growth of the City up to 2026. The Revised 2013 Exeter SHLAA will be used to inform the *Development Delivery DPD*, which is currently being prepared.
- 1.6 The *South West Regional Housing Strategy 2005-2016*⁴ sets out indicative boundaries for 14 sub-regional housing market areas (HMAs) in the region. The HMAs have been translated into the nearest equivalent district authority boundaries for practical purposes. Joint working across the whole of an HMA to assess levels and types of housing is seen as essential. Strategic Housing Market Assessments (SHMAs) provide evidence of the level and type of need in a sub-regional housing market area.

¹ Department of Communities and Local Government (DCLG) (March 2012) *National Planning Policy Framework*

² DCLG (July 2007) *Strategic Housing Land Availability Assessments – Practice Guidance*

³ Improvement and Development Agency (I&DeA) & Planning Advisory Service (PAS) (January & July 2008) *Strategic Housing Land Availability Assessment and Development Plan Preparation*

⁴ South West Regional Assembly (2005) *South West Regional Housing Strategy 2005-2016*

- 1.7 Exeter is in the Exeter HMA, which also includes East Devon, Mid Devon, Dartmoor National Park and Teignbridge local planning areas. A *SHMA* report for the Exeter HMA was published in 2007⁵. It was updated in 2010⁶.

Approach and methodology

- 1.8 The LPA partners in the Exeter HMA have formed a steering group who have together developed a *SHLAA Methodology*⁷ and drawn up a constitution and terms of reference for a SHLAA Panel. The *Methodology* is firmly based on the advice set out in the *CLG Guidance*.
- 1.9 The *Methodology* was subject to public consultation and then published in September 2008. It has since been revised. The latest version of the *Methodology* is available on Exeter City Council's website at www.exeter.gov.uk/SHLAA.
- 1.10 Also available to view via the above link are the 2009, 2010 and 2013⁸ editions of the Exeter SHLAA.
- 1.11 *CLG Guidance* advises that SHLAA should be reviewed regularly to support the updating of the housing trajectory and the five year supply of specific sites.
- 1.12 This document comprises Exeter's fourth SHLAA. It has been prepared in accordance with the *CLG Guidance* and the *Methodology* and in conjunction with the SHLAA Panel of Stakeholders. Further details of the review are included in this report. The base date for the SHLAA – i.e. the date from which potential housing delivery in Exeter is assessed - is 1 April 2014.

⁵ ORS (2007) *Exeter and Torbay Strategic Housing Market Assessment*

⁶ ORS (2010) *Exeter and Torbay Strategic Housing Market Assessment: Exeter Update 2010*

⁷ Local Authorities of the Exeter HMA (July 2013) *Methodology for SHLAAs: Exeter Housing Market Area*

⁸ Exeter City Council (August 2009) *Exeter 2009 Strategic Housing Land Availability Assessment*; Exeter City Council (December 2010) *Exeter 2010 Strategic Housing Land Availability Assessment*; Exeter City Council (February 2013) *Exeter 2013 Strategic Housing Land Availability Assessment*

2 THE PURPOSE AND CONTENT OF THE ASSESSMENT

Purpose and minimum requirements of a SHLAA

2.1 The SHLAA serves two primary purposes:

- It identifies suitable sites with potential for housing, assesses that potential and estimates when sites are likely to be developed; and
- It assesses the five year supply of deliverable housing sites for the purpose of National Indicator 159: supply of ready to develop housing sites⁹.

2.2 The SHLAA is a technical study that will be used as part of the evidence base in the process of plan making.

Deliverable and developable sites

2.3 The *CLG Guidance* (paragraph 33) states that to be regarded as **deliverable** within the next five years, a site should be:

- **available** for development now;
- **suitable** – in a location where development would contribute to a sustainable mixed community; and
- **achievable** – there is a reasonable prospect that housing will be delivered on the site within five years.

2.4 The SHLAA process includes making an assessment of sites to determine whether they are deliverable within the next five years. As such, the SHLAA provides the evidence for demonstrating Exeter's five year deliverable housing land supply.

2.5 Looking beyond the next five years, there will be sites considered potentially **developable** in the subsequent ten years. The *CLG Guidance* defines developable sites as those 'in a suitable location for housing development and there should be reasonable prospect that it (the site) will be available for and could be developed at a specific point in time' (paragraph 33).

Monitoring and review

2.6 The *CLG Guidance* advises that the SHLAA should be reviewed on an annual basis. However, the City Council monitors housing supply on a continual basis and therefore may update the SHLAA on more than one occasion during the course of a year. A full resurvey (or 'call for sites') should not be needed every year. Sites that are brought to the attention of the City Council over the course of the year will be assessed, along with a further appraisal of sites formerly discounted, to see if the constraints have changed.

Status of the SHLAA and identified sites

2.7 The following points are made to provide clarity about the status of sites identified within the SHLAA. This helps to avoid confusion and misunderstanding:

- The SHLAA does not pre-empt future plan making or related decisions;
- The SHLAA is not part of the Development Plan. It is part of the LDF technical evidence base;
- The SHLAA does not prejudge the relative merits of sites for development or rank them in order of preference;

⁹ DCLG (October 2007) *The New Performance Framework for Local Authorities & Local Authority Partnerships: Single Set of National Indicators*

- Sites assessed as deliverable/developable may be tested further through the plan making process for DPDs, where judgements will be made about whether the sites should be allocated for development. This will include rigorous testing through sustainability appraisal/strategic environmental assessment, habitats regulation assessment; stages of public participation and independent examination;
- The positive assessment of a site in the SHLAA does not guarantee that planning permission will be granted for new housing. However, the SHLAA may be a material consideration in the determination of planning proposals;
- The SHLAA does not preclude sites being developed for other suitable uses;
- The SHLAA does not preclude other sites that have not been identified in the SHLAA from being developed for housing.

3 INVOLVEMENT OF STAKEHOLDERS IN THE SHLAA

Joint Methodology for the Exeter Housing Market Area

3.1 In order to produce a robust and reliable SHLAA, *CLG Guidance* advises that the assessments be prepared in collaboration with stakeholders in the housing sector. Where housing market areas cover more than a single authority's area, the relevant local authorities are advised to work in partnership to prepare joint assessments or use a consistent methodology. As explained in paragraphs 1.8 and 1.9 above, a joint *Methodology* is used by the partner local authorities in the Exeter HMA. As the partner authorities are at different stages in their plan preparation programmes, it has not been possible to prepare a joint SHLAA.

3.2 The *Methodology* comprises ten stages:

- Stage 1 Planning the assessment
- Stage 2 Determining which sources of sites will be included in the assessment
- Stage 3 Desktop review of existing information
- Stage 4 Determining which sites and areas will be surveyed
- Stage 5 Carrying out the survey
- Stage 6 Estimating the housing potential of each site
- Stage 7 Assessing when and whether sites are likely to be developed
 - (7a) assessing suitability for housing
 - (7b) assessing availability for housing
 - (7c) assessing achievability for housing
- Stage 8 Review of the assessment
- Stage 9 Identifying and assessing the housing potential of broad locations (where necessary)
- Stage 10 Determining the housing potential of windfalls (where justified)

The SHLAA Panel

3.3 The partner local authorities have established a shared Panel of housing stakeholders, who act on a voluntary basis. Although membership of the Panel has changed over time, there has been a good degree of continuity. This has led to increasing confidence and consistency in applying the *Methodology* to individual SHLAAs. Panel members have also provided detailed advice on the current condition of the housing market and contributed generally to the work of the local authorities in the Exeter HMA. The role and responsibilities of the Panel are explained in further detail in the *Methodology*.

3.4 In order to establish a representative local Panel, invitations for membership went out to a wide range of large, medium sized and small housing building companies, architects, estate agents and planning consultants. The Panel also includes a range of statutory agencies such as the Environment Agency, Highway Authority, Highways Agency and Natural England. The local community is represented, in the case of Exeter City Council, by the Exeter Civic Society. The Panel that conducted the assessment of sites in Exeter for the Draft Revised 2013 SHLAA is set out in Appendix 1. Panel members are required to make declarations of interest where any personal, financial or prejudicial interests apply.

4 THE PLANNING BACKGROUND

National planning policy

- 4.1 The national planning policy background to the Revised 2013 Exeter SHLAA is set out in paragraphs 1.2 and 1.3 above.

Local planning policy

- 4.2 The main policy document covering spatial development in Exeter is the *Exeter Core Strategy*¹⁰ (adopted February 2012) (*Core Strategy*). In addition, certain policies in the *Exeter Local Plan First Review 1995-2011*¹¹ (the *Local Plan*) have been saved for development management purposes. These policies will be superseded by those contained in the emerging *Development Delivery DPD*.
- 4.3 The *Core Strategy* aims to enable Exeter “to grow without damaging (its) environmental assets” (paragraph 4.10). It identifies suitable strategic locations for residential development, comprising land within the existing urban area (including two regeneration areas: the Grecian Quarter and Water Lane area) and sustainable urban extensions to the east at Monkerton/Hill Barton and Newcourt and to the south-west at Alphington. The *Core Strategy* expressly steers development away from the hills to the north and north-west of the City, as these are important to its landscape setting and character.
- 4.4 The *Core Strategy* seeks to provide for at least 12,000 new dwellings in Exeter between 2006 and 2026.

¹⁰ Exeter City Council (February 2012) *Exeter Core Strategy 2006-2026*

¹¹ Exeter City Council (2005) *Exeter Local Plan First Review 1995-2011*

5 CONDITION OF THE HOUSING MARKET

- 5.1 *CLG Guidance* notes that the effect of market conditions on economic viability should be taken into account in assessing the deliverability and developability of potential housing sites to produce a realistic and reliable assessment.
- 5.2 As elsewhere in Britain, the South West region's economy was affected by the global and national economic crises of 2008 and the subsequent national recession. However, average house prices in the region have remained fairly stable. The average annual house price in the South West was slightly lower in 2012 than in 2007, just before the recession commenced¹². In terms of actual development, housing completions in Exeter increased between April 2011 and April 2012, but fell between April 2012 and 2013.¹³
- 5.3 The Panel has taken the current housing market into account in coming to their decisions on the viability of housing development on each site, which is reflected in their conclusions. The Panel has also provided some general advice on how current market conditions should be reflected in the delivery of housing in the sub-region (see paragraph 6.13 below).

¹² <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-295371> .

¹³ Exeter City Council (April 2012). *Housing Planning Permissions and Completions 2011/12/13*.

6 THE SCOPE OF THE ASSESSMENT

Stage 1: Planning the assessment

- 6.1 Preparation of this SHLAA has followed on from work on earlier editions, together with other work in the Exeter HMA undertaken by Teignbridge, Mid Devon and East Devon District Councils and the Dartmoor National Park Authority. The work, including all site visits, technical assessments and the production of information material, was undertaken in-house. There has been a commendable practice of Panel members undertaking their own site visits.

Stage 2: Determining which sources of sites should be included in the assessment

- 6.2 The *CLG Guidance* provides information on the sources of sites with potential for housing. The sources comprise sites already in the planning process and those that are currently outside. They include:

Sites in the planning process:

- Sites with unimplemented / outstanding planning permission for housing;
- Housing sites where construction has commenced;
- Existing housing allocations and site development briefs;
- Land allocated (or with permission) for employment or other land uses that are no longer required for those uses; and

Sites not currently in the planning process:

- Vacant and derelict land and buildings;
- Surplus public sector land;
- Land in non-residential use that may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed-use development;
- Additional housing opportunities in established residential areas, such as underused garage blocks;
- Sites in rural settlements and rural exception sites;
- Urban extensions;
- Large scale redevelopment and redesign of existing residential areas.

Stage 3: Desktop review of existing information

- 6.3 In preparing the Revised 2013 SHLAA, the Council contacted all applicants (or their agents) for extant planning permission of 5 or more dwellings, to obtain an update on their planned start dates and completion rates. In terms of sites not currently in the planning process (i.e. those without planning permission, or with a resolution to approve):

- the assessments of sites considered in earlier editions of the SHLAA were updated where necessary;
- a further 8 new sites for assessment were identified from the Council's database of pre-application inquiries made since 1 February 2013 (i.e. since publication of the 2013 SHLAA).

- 6.4 Site information was recorded and assessed in the manner set out in the *Methodology*. The information was collated for consideration by members of the SHLAA Panel. In total, **119 sites** were identified for assessment in the Revised 2013 SHLAA.

Site size threshold

- 6.5 In accordance with the *Methodology*, for sites without planning permission, a minimum site size threshold of five dwellings (gross) or 0.15 hectares was applied.

Stage 4: Determining which sites and areas will be surveyed

- 6.6 Sites not currently in the planning process were given a preliminary scoping (Stage A Assessment – see Table 1 below) to determine whether they should be taken forward for consideration in further detail. The scoping entailed applying the site threshold criterion and analysing whether the site conformed to strategic planning policy, biodiversity and geodiversity protection criteria and flood risk criteria (see Table 1 below).
- 6.7 Table 1 sets out the scoping criteria for assessing whether a site should be taken forward for detailed consideration in the SHLAA.

Table 1: Stage A Assessment: Criteria for exclusion from the SHLAA	
Conformity with strategic policy for development distribution	
Does the location of the site accord with strategic policy for development set out in the Core Strategy?	Yes: Assess the identified site further
	No: Discount the site from the SHLAA and assign a nil housing potential
Biodiversity and geodiversity	
Does the site fall within, or will development cause harm to, a Site of Special Scientific Interest (SSSI) a Special Area of Conservation (SAC), or County Wildlife Site.	Yes: Discount the site from the SHLAA and assign a nil housing potential
	No: Assess the identified site further
Land at risk of flooding	
Is the site situated within Flood Risk Zone 3b (i.e. the functional flood plain)?	Yes: Discount the site from the SHLAA and assign a nil housing potential
	No: Assess the identified site further

Stage 5: Carrying out the survey

- 6.8 Those sites that passed the Stage A Assessment were then examined in detail through a Stage B Assessment. The Stage B Assessment involved undertaking a variety of technical investigations and site surveys for each site. A great deal of information on heritage characteristics, biodiversity, land use, flood risk etc is accessible on Exeter City Council's geographic information system (GIS). Site characteristics recorded include site size, site boundaries, current uses, surrounding land uses and characteristics of the surrounding area, physical constraints (e.g. slope, access, flood risk, natural, archaeological and historic features) and development progress (where applicable).

Stage 6: Estimating the housing potential of the site

- 6.9 To estimate the housing potential of sites, the *Methodology* applies 'gross to net developable area ratios' across the housing sub-region. However, it allows the partner authorities to depart from this where it can be justified. The ratios take into account the proportion of the total site area needed to provide roads, pavements and other services and facilities.
- 6.10 Appendix G of the 2009 Exeter SHLAA includes evidence to justify a departure in Exeter's case. In accordance with this evidence and unless otherwise stated in the individual site assessments contained in Appendix 3, a net developable area of 100% was applied to sites measuring up to 1 ha gross (i.e. the whole site was considered to be developable). A net developable area of 80% of the gross was applied to sites measuring 1 ha or more.
- 6.11 Density standards were then applied to the net developable area of each site, to estimate their housing potential. The *Methodology* contains standard densities for the sub-region, but again allows a partner authority to depart from these where it has an adopted density policy. Policy CP4 of the *Core Strategy* states that residential development should achieve

the highest appropriate density compatible with the protection of local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network. Therefore, where the *Methodology's* density standards were considered to be inappropriate for a site, its housing potential was calculated in the context of Policy CP4, in consultation with the Council's the SHLAA Panel.

- 6.12 For the purposes of the SHLAA housing trajectory, annual delivery (or completion) rates must be applied to sites where development would take place over a number of years. The *Methodology* sets out a standard approach to determining the rate within the Exeter HMA area.
- 6.13 The *Methodology* also states that delivery rates may be moderated by market condition factors, or other known circumstances that may affect housing completions. In view of current depressed housing market conditions, for the Revised 2013 SHLAA the rates are halved for all sites predicted to come forward during the 1-5 year time band, as recommended by the Panel and explained in more detail in Appendix 2.
- 6.14 Notwithstanding the approach set out in the *Methodology*, the City Council consulted the applicants and/or landowners of all SHLAA sites with and without planning permission for 5 or more dwellings, for their annual delivery predictions. This approach adds significant weight to the conclusions of the Revised 2013 SHLAA.

Stage 7: Assessing when and whether sites are likely to be developed

- 6.15 As set out in paragraph 2.1 above, the purpose of a SHLAA is twofold: to identify **deliverable** sites for the first 5 years of a plan that are ready for development; and to identify specific **developable** sites from years 6 onwards.
- 6.16 To be considered **deliverable**, a site should:
- be **available** – the site is available now;
 - be **suitable** – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and
 - be **achievable** – there is a reasonable prospect that housing will be delivered on the site within five years of the base date (i.e. 1 April 2014, for the purposes of the Revised 2013 SHLAA).
- 6.17 In order to be considered **developable**, a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available and could be developed at a specific time.
- 6.18 The *CLG Guidance* notes that the assessment of deliverable and developable sites should be made irrespective of the level of housing provision that is actually needed over the plan period.
- 6.19 In considering a site to be **deliverable** for the Revised 2013 SHLAA, the SHLAA Panel applied the following conventions:
- Planning permission, a planning application, or a land allocation for the development of the site must exist, or pre-application discussions must be taking/have taken place;
 - The site should either be controlled by a housing developer or owned by a land owner who has expressed an interest to sell or a public body (e.g. district council) willing to see the site developed;
 - The site must have the potential to make a contribution to housing delivery during the 5 year period.

- 6.20 Sites that did not meet these criteria and had delivery constraints were considered **developable** in the 6-10 or 11-15 year period. The Panel agreed that this approach was particularly relevant in light of the current depressed housing market.

Stage 7a: Assessing suitability for housing

- 6.21 *CLG Guidance* states that a site is suitable for housing if it offers a suitable location for development and would contribute to the creation of mixed communities. It goes on to say that sites allocated in existing plans and those with an extant planning permission will generally be suitable, subject to any changes in circumstances. For other sites, it lists a range of factors to be considered in assessing a site's suitability:

- policy restrictions;
- physical problems or limitations;
- potential impacts; and
- environmental conditions.

- 6.22 The *Methodology* expands those factors, applying the two stage approach to assessing the suitability of a site set out in paragraphs 6.6 to 6.8 above. Stage A consists of assessing sites against a range of strategic considerations. If a site fails at Stage A, it is deemed to be in an unsuitable location for housing development and does not proceed to the more detailed Stage B Assessment.

- 6.23 A Stage B Assessment consists of checking sites against a wide range of development criteria. Those factors are:

- access to services and facilities;
- highway access, pedestrian and cycle links;
- land status;
- constraints to delivery;
- infrastructure capacity; and
- compatibility with existing and/or proposed surrounding uses.

Stage 7b: Assessing availability for housing

- 6.24 The site submission proforma contained in the *Methodology* includes a question asking landlords to indicate if their proposed site is available and when it may come forward. There could be legal or ownership problems such as lease, tenancy or licence obligations, multiple ownerships or ransom strips that will affect availability and it is important that those matters are known about when sites are considered.

Stage 7c: Assessing achievability for housing

- 6.25 'Achievability' is defined as whether there is a reasonable prospect that housing will be developed within specified time periods. This will be affected by market conditions, the costs associated with the development and the phasing of development schemes. The professional expertise and experience of Panel members adds considerably to the thoroughness and rigour of the achievability assessments.

- 6.26 To help the Panel form its views on achievability, for each site, information was provided on any physical and community infrastructure requirements and other factors needing to be taken into account.

Stage 7d: Overcoming constraints

- 6.27 Where constraints to development on otherwise suitable sites were identified, consideration was given as to how these might be overcome, such as mitigation measures, extending development timescales or adjusting site envelopes to enable access problems or other spatial constraints to be overcome.

Stage 8: Review of the assessment

- 6.28 *CLG Guidance* notes that once the initial survey of sites and the assessment of their deliverability / developability have been made, the housing potential of all the sites should be shown as an indicative housing trajectory. At this stage, judgements may be made on whether sufficient sites to provide for at least the first 10 years of housing development needed in the plan period have come forward, how quickly development is likely to proceed and whether any more detailed analysis (by area or time of development) of the housing potential is needed. Any changes in housing market or development viability factors will need to be considered.
- 6.30 *CLG Guidance* points out that if there appear to be insufficient sites, then the shortfall should be planned for, either by identifying broad locations for growth inside or outside settlements and/or using a windfall allowance.
- 6.31 *PAS Guidance* indicates that a SHLAA should function as an ongoing database, updated regularly. It states that where there are likely to be sufficient sites available, there is no need to update the study to assess further sites for consideration when preparing a Site Allocations DPD. Panel Members have agreed that it should normally be possible to update the database without the need for a further comprehensive study.

Stage 9: Identifying and assessing the housing potential in broad locations (where necessary)

- 6.32 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. It is a way of indicating to local communities where future development will go, and indicates to developers where development will be encouraged. The *CLG Guidance* indicates that broad locations should be allocated to years 11 onwards of the trajectory if the SHLAA fails to indicate sufficient capacity for dwellings to meet the housing requirement in terms of specific sites.

Stage 10: Determining the housing potential of windfalls

- 6.33 Paragraph 48 of the *NPPF* states that an allowance for windfalls may be made in the five-year supply (and, it is therefore assumed, from Years 6 onwards), if the local planning authority has compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to..."historic windfall delivery rates and expected future trends, and should not include residential gardens".

7 FINDINGS OF THE EXETER SHLAA

7.1 207 sites have been considered as part of the revised 2013 SHLAA, comprising:

- 34 sites with planning permission at 1 October 2013, that are under construction;
- 87 sites with planning permission / permission subject to the completion of a S106 Agreement at 1 October 2013, where development has not started; and
- 86 'SHLAA sites', comprising 79 sites carried over from previous SHLAAs and 7 new sites¹⁴.

7.2 In addition, the Revised 2013 SHLAA makes an allowance for 'windfall' housing development and development in areas identified as 'Broad Locations for Growth'.

Sites with planning permission at 1 October 2014 that are under construction

7.3 Unless otherwise discussed with the developer/applicant, it is assumed that the 34 sites falling into this category will be built out in accordance with the aforementioned 'market conditions model' that has been agreed with the Panel (see Appendix 4, Schedule 1).

Table 2: Sites with planning permission under construction			
Site ref.	Address	Anticipated Yield during 2013/14	Yield in Yrs 1-5 (Base date 01.04.14)
1003	Plot F, Cleve House, Exwick Lane	2	0
1007	162-163 Fore Street	1	2
1027A	St Loyes Foundation, Topsham Road	0	135
1027B	Millbrook Village, Topsham Road	25	33
1028	Lower RNSD, Topsham Road	6	283
1030	ORLN, Old Rydon Lane	50	183
1032	Former University of Plymouth, Earl Richards Rd	2	37
1035	Tip Top, 10 East Wonford Hill	1	0
1046	Plot 2, Higher Field, Lodge Hill	1	0
1061	Land adjacent 113 St Katherine's Road	1	0
1092	47 Wonford Street	1	0
1115	Rollestone House, Pennsylvania Avenue	1	0
1125	Treburtha, Woodwater Lane	2	0
1179	69-73 Sidwell Street	0	9
1191	Land off Hill Barton Road	4	129
1195	Higher Duryard House, Higher Duryard	1	0
1200	Pines, Little John's Cross Hill	0	1
1214	3 Ruby Court, Wonford Street	1	0
1218	Ibstock Brick, Harrington Lane	42	188
1219	Dean Clarke House	1	23
1224	Land adjoining Bate Close	3	0
1238	51 Union Road	1	0
1239	Land north of 483-541 & Seabrook Mews, Topsham Road	69	41
1241	Old Stables, Balls Farm Road	1	0
1243	Magdalen House, 54/56 Magdalen Road	5	0
1246	1 Wentworth Gardens	1	0
1248	Magnolia House & Acacia House, Friars Green	3	0
1250	15 Regents Park	3	0

¹⁴ A number of additional SHLAA sites are listed in Appendices 3 and 4, but these now have planning permission/permission subject to the completion of a S106 Agreement and so are included within this latter category.

1263	23 Peterborough Road	1	0
1281	Former Red Cow Inn & 19-20 Red Cow Village	3	3
1284	Holland Park, Old Rydon Lane	1	39
1286	33 Pinhoe Road	-1	0
1294	1 Sanders Road	1	0
1301	Halford Wing (lower ground floor), Dean Clarke House, Southernhay East	0	3
Total		233	1,109

Sites with planning permission / permission subject to the completion of a S106 Agreement at 1 October 2013, where development has not started

7.4 For the majority of sites falling into this category, information on implementation and completion rates have been obtained directly from the applicant / agent. In a small number of cases (only relating to small schemes) it has not been possible to speak to the applicant / agent. In these cases, the standard delivery rate set out in Appendix 2 has been applied. The conclusions of this exercise are summarised in Table 3 below.

Table 3: Sites with planning permission / permission subject to completion of S106 Agt, not started				
Site ref.	Address	Total potential yield	Yield -Years 1-5 (Base date 01.04.14)	Yield - Years 6-12
1013	Locks, Ladysmith Rd	5	0	0
1029	Langdon Site, Old Rydon Lane	47	0	47
1034	5 Tresilian Gardens	2	1	1
1037	14 Exe Street	6	6	0
1040	Land adjacent Strathcairn, Sylvan Road	1	1	0
1041	Land adjacent 169 Honiton Road	1	1	0
1042	90 South Street	2	0	0
1055	United Reform Church, Church Road	3	3	0
1056	19/20 Friernhay Street	1	1	0
1064	1-2 High Street, Topsham	3	3	0
1074	Land adj. Peterhayes, Park Lane	5	5	0
1075	Land adjacent to Quarrylands, Little Johns Cross Hill	1	0	0
1078	98 Honiton Road	2	0	0
1082	Former Speedway Garage, 63 Cowick Street	11	11	0
1090	68 Bovemoors Lane	7	0	7
1123	43 East Avenue	1	1	0
1131	2 Wilcocks Road	1	1	0
1137	Whipton Methodist Church, Brookway	8	8	0
1145	Land adj. Rennes House, Vaughan Rd	21	21	0
1152	Foxhayes Garage, 125 Exwick Rd	11	0	0
1154	Land adjacent 30 Bridge Road	1	1	0
1158	Land west of 48-68 Newport Road	6	6	0
1162	Orchard House, Deepdene Park	3	3	0
1177	Victoria Inn, 36 Victoria Street	1	1	0
1180	4 Spicer Road	4	4	0
1182	10 Honey Lane	2	2	0
1188	Land at Pinhoe Quarry, Harrington Lane	380	0	312
1189	Emmanuel Church, 38 Blackboy Road	2	2	0
1196	40 Magdalen Road	1	1	0
1199	St Loyes Foundation, Topsham Road	24	24	0
1203	Westwood, 132 Beacon Lane	6	6	0

1208	Portland House, Longbrook Street	153	153	0
1210	Open Space, Bennett Square	4	4	0
1211	Kingfisher House, Western Way	69	0	0
1213	Land to east of 16 The Fairway	3	3	0
1215	Flat 8, 37 New Bridge Street	-1	-1	0
1216	Rollestone Farm, Pennsylvania Road	1	1	0
1221	Former Guide Dogs for the Blind Kennels, Exwick Lane	10	0	0
1222	Seabrook Orchards, Topsham Road	700	200	350
1225	17 Cambridge Street	1	0	0
1226	12 Queens Terrace	1	1	0
1227	5 Bystock Terrace	1	1	0
1228	3 Well Street	2	2	0
1231	298 Topsham Road	1	0	0
1235	Land adjacent to 11 Lyncombe Close	2	0	0
1240	30-32 Heavitree Road	1	1	0
1247	46-47 Cowick Street	-1	0	0
1249	Pilton House, Pilton Lane	2	2	0
1254	Land adjacent 13 Park Lane	1	1	0
1255	9 Badon Close	1	1	0
1257	Bishops Court Quarry, Apple Lane	190	190	0
1258	Former Exeter & Middlemoor Service Station, Rydon Lane	14	14	0
1259	Land adjacent Beech Cottage, Old Rydon Lane	16	16	0
1261	Tithebarn Green at Monkerton	300	300	0
1262	Land at Sandrock, Gipsy Hill Lane	50	50	0
1268	52 Northernhay Street	2	2	0
1270	7 Hoopern Avenue	1	0	0
1271	52 Oxford Road	1	1	0
1272	15 York Road	4	4	0
1274	SWW Reservoir Site, Dunsford Road	1	1	0
1275	Aloha & Journey's End, Aspen Close	1	1	0
1276	102-104 Fore Street	12	0	0
1277	305 Topsham Road	3	3	0
1278	St Loyes Foundation, Topsham Rd	7	7	0
1279	28 Main Road	1	1	0
1280	Land off Ennerdale Way	9	9	0
1282	130 Fore Street	14	14	0
1283	Land at Hill Barton	750	162	588
1289	The Haven, Alphington Street	-1	-1	0
1290	Westover, Little Johns Cross Hill	1	1	0
1291	28 Manor Road	9	9	0
1292	Land west of Higher Furlong, Hollow Lane	2	2	0
1293	Guildford Mews, Gloucester Road	1	1	0
1294	School House, Millbrook Lane	4	4	0
1296	91A South Street	1	1	0
1297	Magdalen House, 54-56 Magdalen Road	1	1	0
1298	Land adjacent Cotmead, 58 Langaton Lane	2	2	0
1299	47 Wonford Street	1	0	0
1302	The Castle, Castle Street	2	2	0
1303	Windy Ways, Aspen Close	2	2	0
1305	Trinity Court, Southernhay East	22	22	0
1306	1 Ladysmith Road	1	1	0
1307	Former Mambo's & Tiffany's Nightclub, 37	6	6	0

	Commercial Road			
1308	Armada House, 15 New North Road	1	1	0
1311	Land r/o 48 Whipton Village Road	8	8	0
1312	Central Station Yard, Queens Street	25	0	0
1313	Pembroke House, Southernhay East	15	15	0
Total		3,007	1,334	1,305

SHLAA Sites (sites without planning permission)

- 7.5 In summarising the findings of the 86 SHLAA sites submitted for assessment by landowners and/or their agents, it is important to bear in mind the overarching principles governing the assessment. In order to be considered a potential contributor to the stock of housing land, a submitted site should be **suitable**, **available** and **achievable** (see paragraph 6.16 above). Assessment of these factors enables judgements to be made on whether a site is **deliverable** (paragraph 6.16) or **developable** (paragraph 6.17).
- 7.6 Detailed suitability, availability and achievability assessments of the 86 SHLAA sites are set out in Appendix 3. The following paragraphs provide a summary of the assessments.
- 7.7 Twenty seven sites proposed by landowners and/or their agents have been excluded at Stage A of the suitability assessment. This is because of clear conflict with strategic policy set out in Policy CP1 of the *Core Strategy*, and/or due to the unacceptable impact of any development upon biodiversity or geodiversity and/or because the site is at significant risk of flooding. The sites are listed in Table 5 below:

Site ref.	Address	Reason for exclusion
1	Land south of Exwick Barton Cottages, St Andrews Rd	Strategic policy
6	Land at Stoke Road	Strategic policy
10	Land off Tedburn Road	Strategic policy
11	Land off Hambeer Lane	Strategic policy
13	Oaklands Riding School & The Rosary, Balls Farm Rd	Strategic policy
21	Land at Stoke Hill	Strategic policy
31	Oakfields, Church Hill	Strategic policy
32	Estuary View, Church Hill	Strategic policy
67	Yeomans Gardens, Newcourt Road	Strategic policy
68	Land north of Newcourt Road, Topsham	Strategic policy
69	Land north of Exeter Road, Topsham	Strategic policy
70	Mays Field, Topsham	Strategic policy
71	Attwells Farm, Exwick Lane	Strategic policy
74	Land west of Salmonpool Bridge	Flood risk
75	Land east of Salmonpool Bridge	Flood risk
78	Land adjacent 2 Hill Cottages, Church Hill	Strategic policy
85	Five Acres, Exeter Road, Topsham	Strategic policy
86	Land s. of Rushmore Nursery, Newcourt Rd, Topsham	Strategic policy
87	Land opp. Riversmeet House, Riversmeet, Topsham	Strategic policy and flood risk
90	Land adjoining Exwick Lane	Strategic policy
91	Barley Wood, Barley Lane	Strategic policy
92	Land west of Barley Lane	Strategic policy
93	Land south of Perridge Close	Strategic policy
99	Land north of Beacon Heath	Strategic policy
100	Land north & south of Church Hill	Strategic policy
106	Exeter University Playing Fields, Exeter Road, Topsham	Strategic policy
107	Land adjoining 46 Newcourt Road, Topsham	Strategic policy

7.9 A further 15 SHLAA sites have been excluded following Stage B of the suitability assessment. These sites are set out in Table 6 below, alongside a brief explanation for their exclusion.

Table 6: SHLAA sites discounted at Suitability Test Stage B		
Site ref.	Address	Reason excluded
2	Land off St Andrews Road	Loss of green infrastructure
33	Land adjacent 3 Pinn Lane	Inadequate highways access
38	Land south of Gipsy Hill Lane	Loss of green infrastructure, inadequate highways access and not compatible with surrounding development
43	Hessary, Hollow Lane	Inadequate highways access
52	Ludwell Gardens, Ludwell Lane	Loss of green infrastructure, inadequate highways access and not compatible with surrounding development
55	Car park north of Digby Drive	Loss of Park and Ride facility.
57	Land south of Russell Way	Loss of biodiversity (part), inadequate highways access & not compatible without surrounding development
64	Playing field south of Wear Barton Road	Loss of green infrastructure
66a	Land west of the M5, Topsham Road	Noise levels
76	Marypole Head, Pennsylvania Road	Inadequate highways access
81	The Vines, Gipsy Hill Lane	Loss of green infrastructure
82	Clyst View, Hollow Lane	Loss of green infrastructure
88	Land adjoining 6 Exe View Cottages	Inadequate highways access
97	Land at Ringswell Campus, Bramley Lane	Loss of green infrastructure
104	Land west of Newcourt House, Old Rydon Lane	Impact on built environment and not compatible with surrounding development.

7.10 The remaining SHLAA sites have been subjected to a test of availability. Following confirmation that they are no longer available for development, sites 12, 26, 28, 34 and 48 have failed this test.

7.11 The SHLAA Panel has considered the achievability of the 39 sites that have passed the tests of suitability and achievability. In summary, the Panel has advised that the 4 sites set out in Table 7 below are unachievable because development would be economically unviable.

Table 7: SHLAA sites discounted as unachievable	
25	35-39 Summer Lane
73	17-19 Water Lane
79	23 Causey Lane
80	Bayonne, Pinhoe Road

7.12 Table 8 lists the 40 SHLAA sites considered to have passed the tests of suitability, availability and achievability and summarises their potential contribution to housing provision to 2026 (Year 12). It is concluded that the sites have the potential to deliver 645 dwellings in Years 1-5 and a further 1,975 dwellings thereafter to 2026 (Year 12).

Table 8: SHLAA sites considered suitable, available and achievable				
Site ref.	Address	Yield – Years 1-5 (base date 01.04.14)	Yield – Years 6-10	Yield – Years 11-12
3	Exwick Middle School, Higher Exwick Hill	0	35	0
5	Foxhayes School, Gloucester Road	0	13	0
7	Land adj Exeter St Davids Station, Bonhay Rd/Cowley Bridge Rd	0	0	87
9	Nos. 36-38 Well Street	0	5	0
15	Land bounded by St Sidwell St, Paris St, Belgrave Rd & Summerland St	0	0	75
16	ERADE, Topsham Road	0	149	0
17	Isca House, Haven Road	0	0	75
18a	Land west of Shillingford Road	8	0	0
18b	Land east of Shillingford Road	37	27	0
18c	Land between Chudleigh Road & Dawlish Road	37	239	0
19	Land north of Markham Lane	0	0	75
20	Land west of Chudleigh Road	37	12	0
23	Exmouth Junction, Prince Charles Road	81	37	0
36	Land north & south of Tithebarn Lane	0	8	0
39	Land at Monkerton	145	260	0
40	Land north & south of Harts Lane	37	94	0
41	Land west of Pilton Lane	37	33	0
42	Land adjacent Higher Furlong, Hollow Lane	0	16	0
46	Hill Barton Farm, Hill Barton Road	0	7	0
53	Land north of West of England School, Topsham Road	37	146	0
58	Land south of the A379	62	138	0
60	Land east of the railway, Old Rydon Lane	0	0	75
62	Exeter Golf & Country Club Practice Ground	0	112	0
66b	Land east of the M5, Exeter Road, Topsham	20	0	0
84	Land north of Wessex Close, Topsham	8	0	0
89	Land off Liffey Rise	13	0	0
94	Land at Exeter Cricket Ground, Prince of Wales Road	23	0	0
95	Land adjoining Exeter Mobility Centre, Wonford Road	0	8	0
98	Honeylands Hospital, Pinhoe Road	0	8	0
101	Middlemoor HQ Site A, Alderson Drive	0	34	0
102	Middlemoor HQ Site B, Alderson Drive	0	49	0
103	Land south of Apple Lane	0	0	64
105	Land west of Newport Park, Topsham Road	22	0	0
108	Land opposite 7-10 Glenthorne Road	15	0	0
109	Mary Arches Car Park, Mary Arches Street	0	50	0
110	23-26 Mary Arches Street	14	0	0
111	Eagle Yard, Tudor Street	10	0	0
112	Land at Eastern Fields, Exhibition Way	0	56	0
113	Land south of Woodwater Park	0	28	0
115	Beech Cottage, Old Rydon Close	3	0	0
Total		646	1,564	451

Windfall sites

- 7.13 Paragraph 48 of the *NPPF* allows local planning authorities to include windfall sites in the five year housing land supply calculation and, by inference, the calculation of potential housing delivery for the whole plan period, if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a realistic source of supply.
- 7.14 Windfalls have historically comprised a significant proportion of housing completions in Exeter. The Inspector's report into the *Core Strategy* concludes that there is no reason to suggest that windfalls will not continue to come forward in the same way as in the past.
- 7.15 Schedule 3 of Appendix 4 contains an historic assessment of windfalls in Exeter. For the purposes of the SHLAA, windfalls are defined as dwellings completed between 1 April 2001 and 31 March 2013, minus those built on:
- allocated sites;
 - residential gardens; and
 - sites identified in the SHLAA.
- 7.16 Appendix 5 contains a detailed analysis of likely windfalls in Exeter to 2026. Based on that analysis, an allowance is made in the *Revised 2013 SHLAA* for 99 (99.46) windfall completions per year in Years 1-5 and 105 (104.56) windfall completions thereafter.

Five year supply of deliverable land for housing (National Indicator 159)

- 7.17 The *NPPF* requires local planning authorities to identify and maintain a rolling five year supply of deliverable land for housing ('the five year supply').
- 7.18 The basis for calculating the five year supply is the current adopted development plan. In the case of Exeter, this is the *Exeter Core Strategy*. The *Core Strategy* proposes that at least 12,000 dwellings should be built in Exeter between 2006 and 2026. This equates to an average annual requirement of 600 dwellings and a basic five year requirement of 3,000 dwellings.
- 7.19 The *NPPF* states that local authorities should add a buffer of 5% to the five year housing requirement, to ensure choice and competition in the market for land; or 20% where there has been a record of persistent under delivery. The Government does not define or advise how to identify 'persistent under delivery'.
- 7.20 There is not a record of persistent under delivery in Exeter. Between 2001 and 2012 (i.e. prior to the adoption of the *Core Strategy*), the adopted plan¹⁵ set an annual target of 447 dwellings. On average, 608 dwellings per year were delivered. The *Core Strategy*'s annual target of 600 homes was missed in 2012/13, but one year of under delivery does not amount to persistent under delivery. Therefore a buffer of 5% is reasonable. 5% of 3,000 dwellings equates to 150 dwellings.
- 7.21 Recent appeal decisions taken by the Planning Inspectorate indicate that local authorities should add any shortfall in provision during the plan period to the remaining plan period. Based on an annual target of 600 dwellings, 4,800 dwellings should be completed over the eight years between 1 April 2006 and 31 March 2014. A shortfall of 749 dwellings (4,800 minus predicted completions for 2006-2014 of 4,051 dwellings) must therefore be added to the remaining twelve year plan period, amounting to 62.4 dwellings per year and 312 dwellings during Years 1-5.

¹⁵ Devon Structure Plan.

7.22 Table 9 below summarises the method for calculating the five year supply requirement. Row F identifies the total requirement as **3,462** dwellings.

Table 9: Five year supply requirement for Exeter under Submission Core Strategy		
A	Submission Core Strategy requirement 2006 - 2026 (20 years)	12,000
B	Average annual rate 2006 – 2026 (A / 20)	600
C	Basic five year requirement (B x 5)	3,000
D	Allowance of five per cent (C x 5%)	150
E	Allowance for shortfall in provision between 2006 and 2014	312
F	Total five year requirement (C+D+E)	3,462
G	Average annual requirement	692

7.23 In terms of housing delivery, the City Council's five year supply calculation takes into account the deliverable sites identified in the SHLAA (paragraphs 7.3 to 7.12 above) and windfall completions (paragraphs 7.13 to 7.16 above). Table 10 below sets out the total number of dwellings by source that are predicted to be delivered over the five year period.

Table 10: Potential number of dwellings that could be built in Years 1-5						
Source of dwellings	2014/15	2015/16	2016/17	2017/18	2018/19	Total
Sites with planning permission at 01.10.2013 under construction	339	291	254	173	52	1,109
Sites with planning permission / permission subject to s106 Agt at 01.10.2013 where development has not started	336	254	274	254	216	1,334
SHLAA sites	0	0	80	290	276	646
Windfalls	99.46	99.46	99.46	99.46	99.46	497.3
Total	774.46	644.46	707.46	816.46	643.46	3,586.4

7.23 Referring back to Table 9, it can be seen that the five year deliverable figure of 3,586 dwellings **exceeds** the requirement of 3,462 by **124** dwellings. It equates to a deliverable housing land supply of **5 years and 3 months**.

Assessment of additional sites with potential for housing

7.24 The second key purpose of the SHLAA is to identify additional sites with housing potential and estimate when they might be developed over the remaining *Core Strategy* plan period.

7.25 Table 11 below reveals that there is a projected deliverable and developable supply of dwellings in Exeter over the remaining plan period of **7,631** dwellings.

Table 11: Potential no. of dwellings that could be built during the remaining plan period				
Source of dwellings	Years 1-5 (base date 01.04.2014)	Years 6-10 (Apr 2019- Mar 2024)	Yrs 11-12 (Apr 2024- Mar 2026)	Total
Sites with planning permission at 01.10.2013 under construction	1,109	5	0	1,114
Sites with planning permission / permission subject to s106 Agt at 01.10.2013 where development has not started	1,334	1,017	288	2,639
SHLAA sites	646	1,564	439	2,649
Windfalls	497.3	522.8	209.12	1,229.22
Total	3,586.3	3,108.8	936.12	7,631.22

- 7.26 The *Core Strategy* sets a target to deliver at least 12,000 dwellings in Exeter between 2006 and 2026. The calculation in Table 12 below shows that, once predicted completions to 1 April 2014 are taken into account, the housing requirement falls to 7,949 dwellings.

A	Submission Core Strategy requirement 2006 - 2026 (20 years)	12,000
B	Predicted completions from April 2006 - March 2014	4,051
C	Remaining housing requirement to 2026 (A-C)	7,949

- 7.27 Referring back to Table 11, it can be seen that the potential number of dwellings coming forward on sites with planning permission, SHLAA and windfall sites **falls short** of the requirement for 7,949 dwellings by **318** dwellings.

Assessment of broad locations for growth

- 7.28 As stated in paragraph 6.33 above, *CLG Guidance* indicates that if the SHLAA fails to identify sufficient capacity for dwellings to meet the housing requirement in terms of specific sites, the contribution of 'broad locations' should be taken into account from year 11 onwards. Broad locations are defined in the *CLG Guidance* as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. To estimate the housing potential of broad locations, regard should be paid to the nature and scale of potential opportunities within the area and market conditions.

- 7.29 The 2013 SHLAA identified five broad locations for growth in Exeter – Water Lane, the Grecian Quarter, Newcourt, Monkerton/Hill Barton and Middlemoor. Monkerton/Hill Barton is discounted as a broad location in the *Revised 2013 SHLAA*, as all sites with the for potential residential development either already have planning permission / permission subject to signing a S106 Agreement, or are identified in the SHLAA. However, the other four broad locations are still considered to offer significant opportunities to deliver housing during the plan period and so are carried forward for reassessment in the *Revised 2013 SHLAA*.

(i) Water Lane

- 7.30 The Water Lane area is identified as a 'Regeneration Area' in the *Core Strategy* (see paragraph 4.4 above). The area is located just outside the City Centre, to the west of the River Exe/Canal and north-east of the mainline railway to Plymouth (see Plan A below, not to scale). It is previously developed and largely in employment use. It is identified as a broad location for three reasons. Firstly, it forms part of a larger area (the 'Quay/Canal Basin Area', the remainder of which has been recently redeveloped or has planning permission) allocated for comprehensive mixed-use development in the *Local Plan*. Secondly, provision of a significant number of new dwellings in the area forms part of the *Exeter and East Devon New Growth Point Delivery Plan (2007)*. Thirdly, the *Exeter Employment Land Review*¹⁶ concludes that the area offers a poor quality location for employment and that alternative uses (e.g. residential) could be considered provided there are no good operational reasons for existing businesses to remain and no evidence of a need to retain employment in the area. As a location for housing, it is highly sustainable and its redevelopment could provide significant regeneration benefits to the City.
- 7.31 The SHLAA has already identified a potential supply of 213 dwellings (mid-point yield) from a specific site in Water Lane during the plan period (see Appendix 4: Schedule 2, Site 17). To assess the broad housing potential of the rest of Water Lane, it is assumed that the only areas not available for redevelopment during the plan period are those already in residential use. Once this land is discounted, it is considered that there are around 7 ha

¹⁶ Exeter City Council (2009) *Exeter Employment Land Review*

where housing could feasibly be developed during the latter part of the plan period. Based on applying a net developable ratio of 80% to the area (see paragraph 6.10 above) and a density range of 50-100 dph (a reasonable range, given the area's edge-of centre location), it is considered that Water Lane could deliver an additional 350 to 700 dwellings, or a mid-point yield of 525 dwellings. However, based on the *Methodology's* assumed build rate, only 125 of these dwellings would come forward during the plan period (see Appendix 4, Schedule 4).

(ii) Grecian Quarter

- 7.32 The Grecian Quarter is also identified in the *Core Strategy* as a 'Regeneration Area' (see paragraph 4.3 above). It comprises an area of previously developed land in the centre of Exeter, bound by Sidwell Street to the west, Western Way to the east and Paris Street to the south (see Plan B below, not to scale). It currently incorporates a variety of land uses, including the City's Bus and Coach Station, employment, retail, leisure, car parking and housing.
- 7.33 The City Council has a long standing commitment to deliver comprehensive redevelopment in the Grecian Quarter. The *Local Plan* allocates the southern part of the site for development. The area as a whole is highly sustainable and offers the opportunity to deliver significant regeneration benefits to the City.
- 7.34 The Grecian Quarter has already delivered 254 dwellings during the Plan period¹⁷. The SHLAA has identified a potential supply of 100 dwellings (mid-point yield) from a specific site in the Grecian Quarter during the plan period (see Appendix 4: Schedule 2, Site 15). It is considered that a further 0.57 ha of the Grecian Quarter has the potential for residential redevelopment during the Plan period. Based on applying the *Methodology's* standard minimum density of 101 dph and an upper limit of 250 dph (which reflects the density achieved on the Shauls Bakery site), the Grecian Quarter could deliver an additional 58 to 143 dwellings, or a mid-point yield of 101 dwellings. 75 of these dwellings would be delivered during the plan period.

(iii) Newcourt

- 7.36 Newcourt is identified in the *Core Strategy* as a strategic allocation (see paragraph 4.4 above). It is defined by the A379 to the north, Rydon Lane to the west, Topsham Road to the south and the M5 motorway to the east (see Plan C below, not to scale). It currently incorporates a range of land-uses, including recreational, residential, employment and greenfield land.
- 7.38 Newcourt delivered 399 dwellings between the start of the Plan period and 31 March 2013¹⁸. Planning permissions for a further 1,153 dwellings have been granted (see sites 1028, 1029, 1030, 1222, 1239, 1259 and 1284 in Schedule 1 of Appendix 4). In terms of additional specific sites, the SHLAA identifies a potential mid-point yield of 533 dwellings (see sites 58, 60, 62 and 114 in Schedule 2 of Appendix 4).
- 7.39 The emerging Development Delivery DPD identifies 16 ha of land at Newcourt for future employment development and a significant amount of land will remain in recreational use. Overall, it is considered that 21 ha are available for further residential development. So far during the Plan period, Newcourt has delivered dwellings at between 24 and 32 dph (gross). If this density of development continues, it is estimated that the 21 ha could deliver

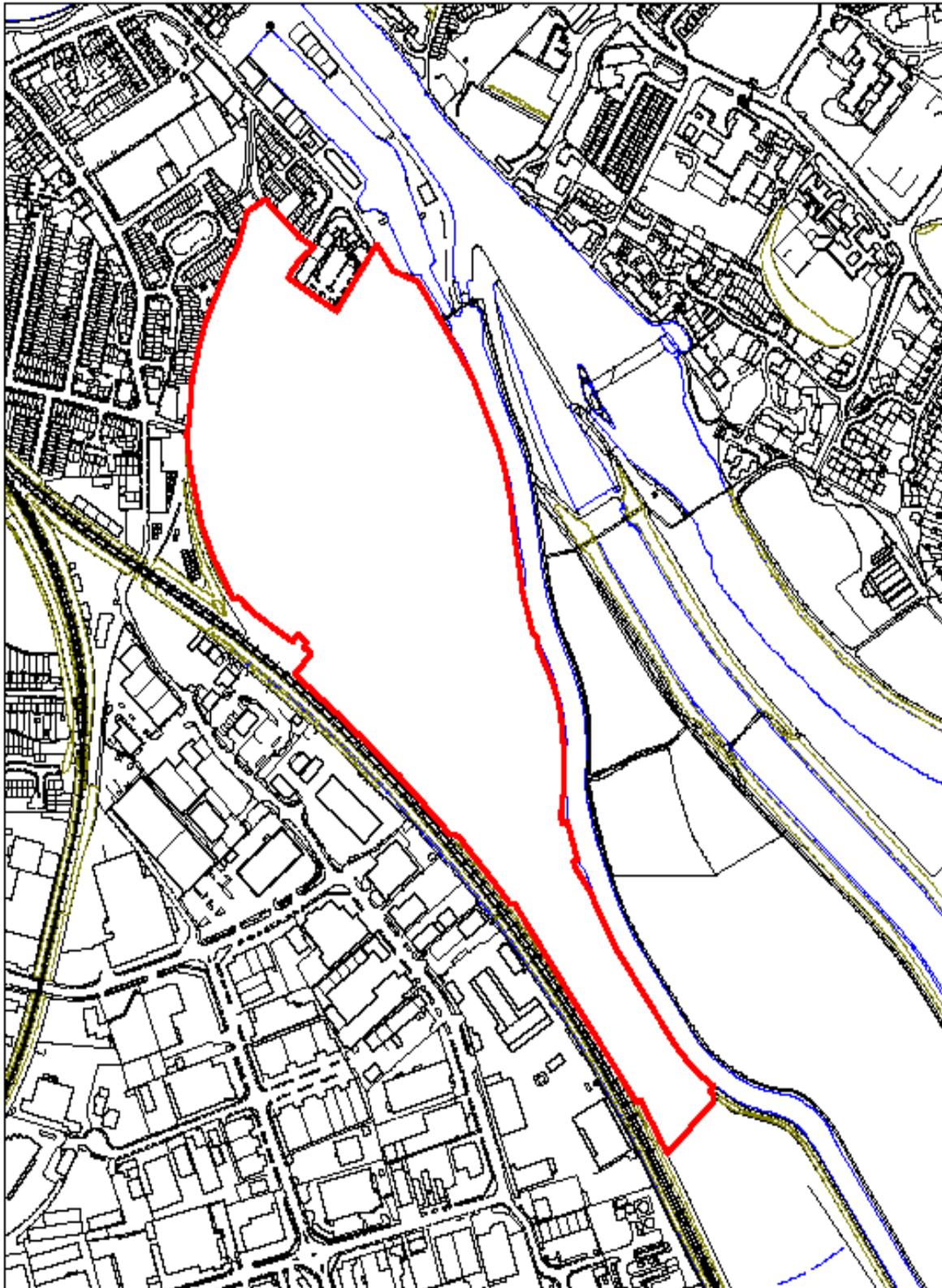
¹⁷ Townsend Printers, Western Way – 131 dwellings (student); Former garage site, Verney Street – 67 dwellings; Former MFI/Focus, Cheeke Street – 24 dwellings; Shauls Bakery, 11 Verney Street – 32 dwellings.

¹⁸ Former RNSD, Topsham Road – 399 dwellings.

between 203 and 384 dwellings, or a mid-point yield of 294 dwellings. Of these, it is assumed that 75 dwellings will come forward during the plan period.

(iv) Middlemoor

- 7.44 Middlemoor lies within the existing urban area, towards the eastern side of the City (see Plan E below, not to scale). Around two thirds of this broad location comprises previously developed land in institutional use, whilst the remainder is open space/playing fields. The area lies on a transport corridor and would provide a sustainable location for future mixed use development. The current landowner has identified two specific sites for residential use through the SHLAA process (Sites 101 and 102 in Appendix 3). Part of the remaining area will be retained in its current institutional use, but the Council considers that a further 3.2 ha could come forward for residential development during the plan period.
- 7.45 Recently permitted schemes in the City have achieved a gross density of 24 to 33 dph. If this density of development continues, it is estimated that the 3.2 ha could deliver between 77 and 106 dwellings, or a mid-point yield of 92 dwellings during the plan period.

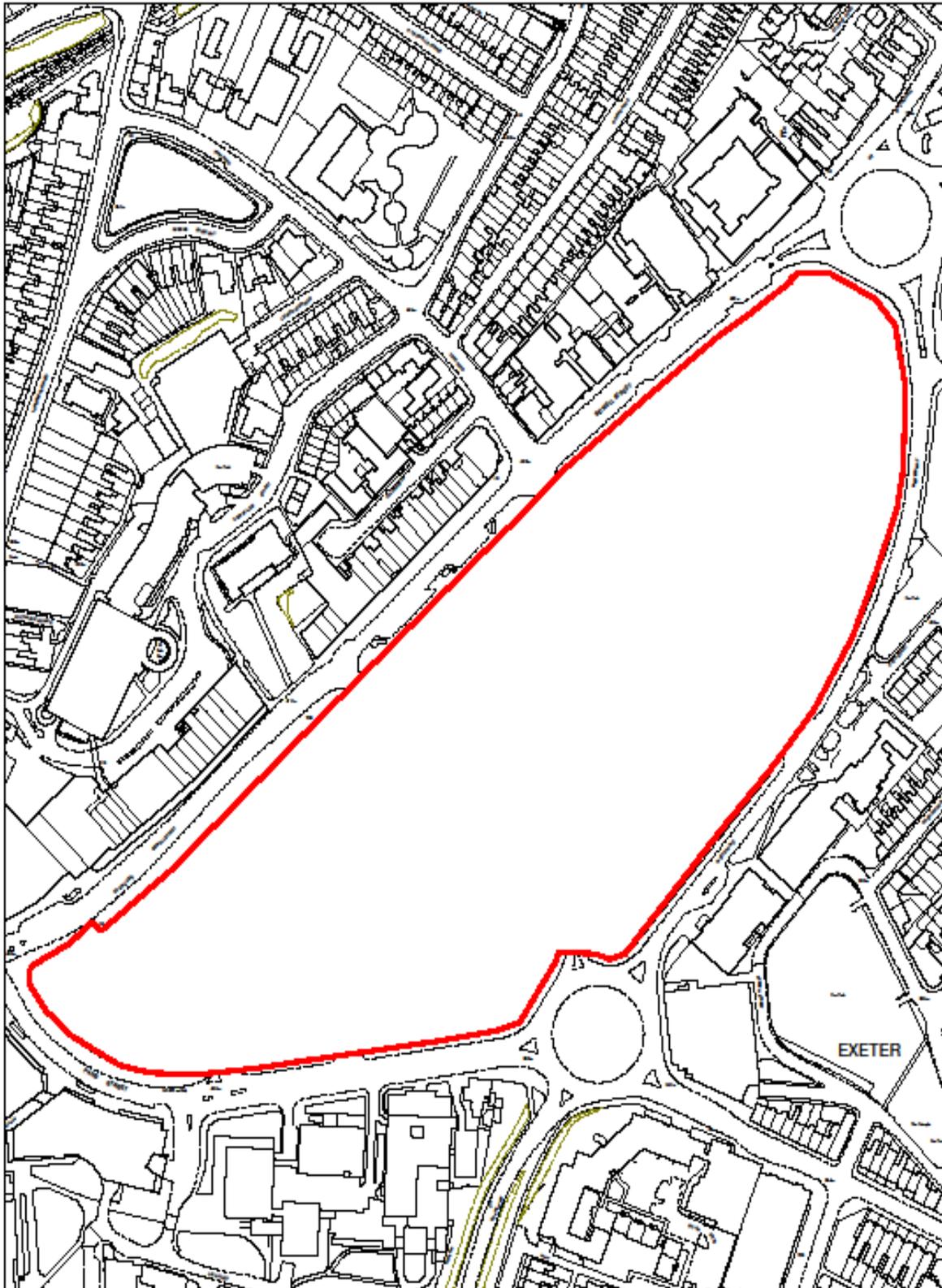


↑ Plan A: Water Lane. Scale: 1:5,000.

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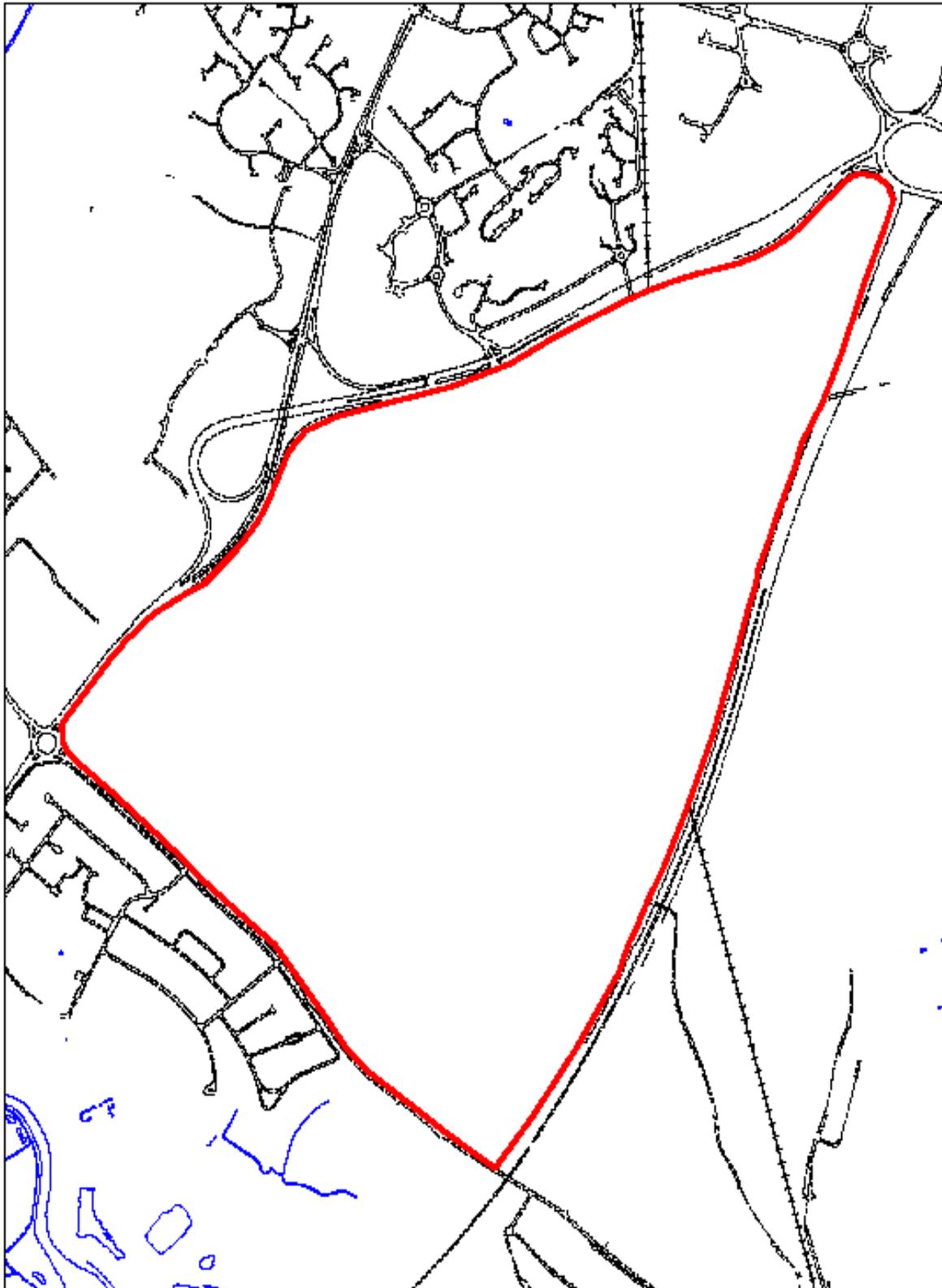


↑ Plan B: Grecian Quarter. Scale: 1:2,500.

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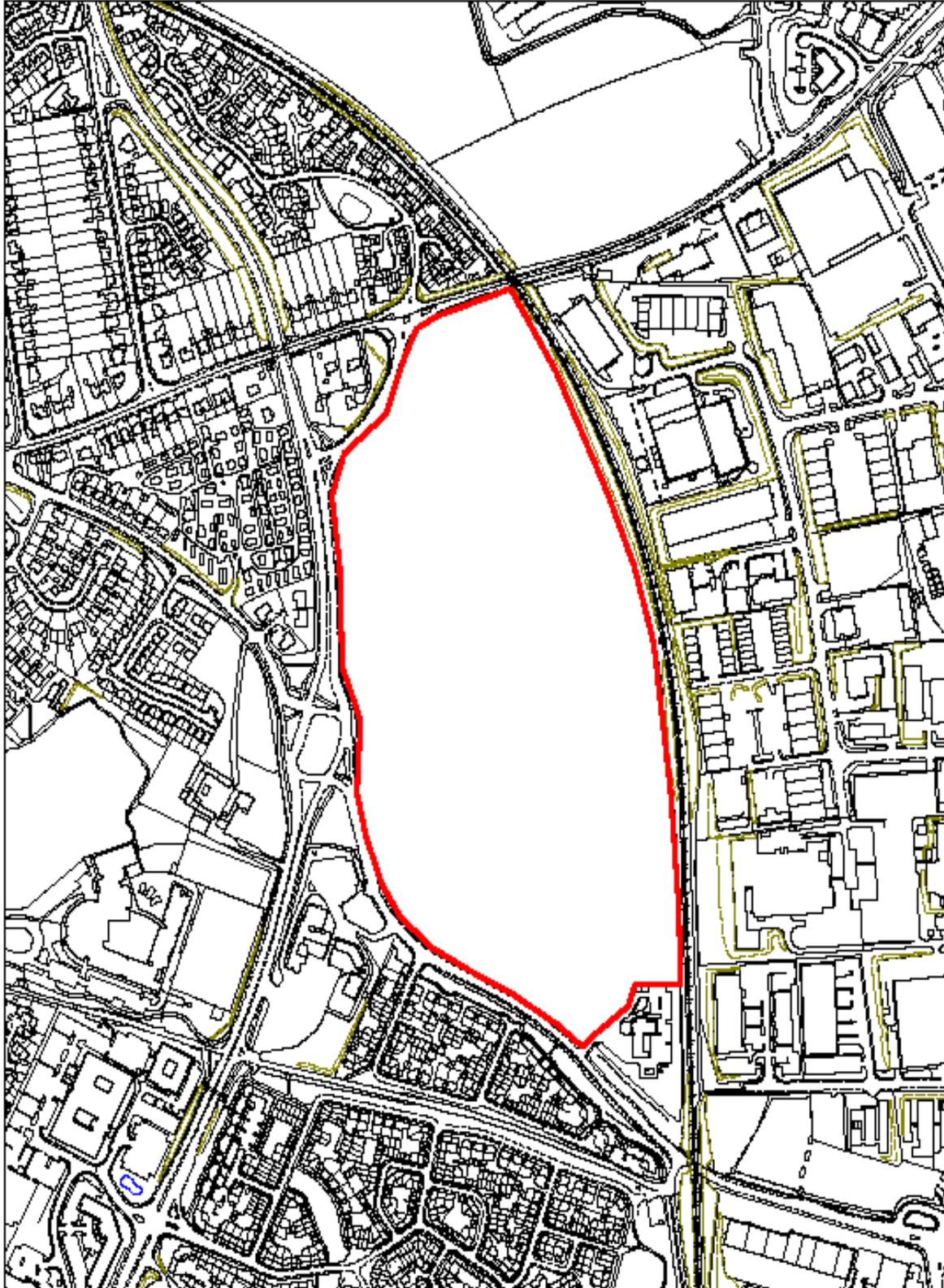


↑ **Plan C: Newcourt**

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↑ Plan E: Middlemoor. Scale 1:5,000.

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7.40 In total, the broad locations for growth could provide a further 843 dwellings from Year 11 onwards, although, based on the *Methodology's* build rate, only 350 of these dwellings would come forward during the plan period.

7.41 Table 13 below summarises the total potential housing land supply over the remaining plan period to 2026, once the potential contribution of broad locations is taken into account.

Table 13: Potential no. of dwellings that could be built during the remaining plan period				
Source of dwellings	Years 1-5 (base date 01.04.2014)	Years 6-10	Years 11- 12	Total
Sites with planning permission at 01.10.2013 under construction	1,109	5	0	1,114
Sites with planning permission / permission subject to s106 Agt at 01.10.2013 where development has not started	1,334	1,017	288	2,639
SHLAA sites	646	1,564	439	2,649
Windfalls	497.3	522.8	209.12	1,229.22
Broad locations for growth	0	0	367	367
Total	3,586.3	3,108.8	1,303.12	7,998.22

7.42 Referring back to Table 12, it can be seen that the number of potential dwellings coming forward during the plan period **exceeds** the requirement to provide 7,949 dwellings by **49** dwellings. Therefore, the predicted housing supply for the remainder of the Plan period exceeds the residual requirement.

7.43 The Council is committed to ensuring that the *Core Strategy* target is achieved, as evidenced in the *Development Delivery Policy Statement*. The Council will continue to closely monitor housing delivery in Exeter to ensure that at least 12,000 dwellings are delivered by 2026.

8 CONSULTATION ON THE SHLAA FINDINGS

- 8.1 This report is not subject to consultation. It is a response to a national policy requirement in the *NPPF* that every local planning authority in England should identify sites with housing potential, assess that potential, and when development is likely to take place. The Council will take decisions on which sites will be allocated through the LDF process. The LDF process allows for various stages of consultation. It is during this process that the SHLAA and any other evidence that the Council will rely on in support of its proposals will be subject to public scrutiny.
- 8.2 The findings of this report are based on the conclusions of the SHLAA Panel and an analysis of existing information in the Council's planning database. The report does not define any policy principles nor does it indicate how the Council will act in response to any planning applications or other planning issues. The report, and any reviews, may be subject to scrutiny when development plan documents are independently examined by the Planning Inspectorate.

APPENDIX 1: Revised 2013 SHLAA Panel Membership

Category	Organisation
National volume housebuilder	Barratt Homes
National volume housebuilder	Persimmon Homes SW
Regional housebuilder	Devonshire Homes
Small scale housebuilder	K F Farleigh Ltd
Small scale housebuilder	Stevens Homes
Small scale housebuilder	Greendale
Land agent	Fulfords Land & Planning
Land agent	Stags
Registered Social Landlord	Devon and Cornwall Housing Group
Registered Social Landlord	Sovereign Housing Group
Statutory Agency	Environment Agency
Statutory Agency	Highways Agency
Statutory Agency	Highway Authority (Devon County Council)
Statutory Agency	Natural England
Statutory Agency	Homes & Communities Agency
Community representative	Exeter Civic Society

APPENDIX 2: 2013 Market Conditions Model

Standard model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the SHLAA panel if warranted due to site specific issues.

Market conditions model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 50 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 75 dwellings per year	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the SHLAA panel if warranted due to site specific issues.

APPENDIX 3: Assessment of sites without planning permission

See separate document.

APPENDIX 4: Schedules and housing trajectory

See separate document.

APPENDIX 5: Windfall Calculation for Exeter

The assessment of windfalls set out below is based on three phases, reflecting those in the SHLAA:

Phase 1	Years 1-5	2014/15 – 2018/19
Phase 2	Years 6-10	2019/20 – 2023/24
Phase 3	Years 11-12	2024/25 – 2025/26

Analysis of past trends

The table below sets out the number of windfall dwellings completed per year since 2002/03 by category. Windfalls are defined by the City Council as any completion not on garden land (as per the NPPF), an allocated site¹⁹, or a site identified in the SHLAA²⁰.

Year (Apr-Mar)	Number of windfall dwellings completed			
	New build less than 5 dwellings	New build of 5 dwellings or more	COU/Conversion	Total
2002/03	16	137	90	243
2003/04	16	85	81	182
2004/05	24	41	74	139
2005/06	21	120	83	224
2006/07	7	86	101	194
2007/08	14	75	77	166
2008/09	15	65	118	198
2009/10	8	105	28	141
2010/11	9	270	42	321
2011/12	12	287	117	416
2012/13	12	165	27	204
Total	154	1436	838	2428
Average	14	130.5	76.18	221

An average of 221 windfall dwellings per annum were completed between 2002 and 2013, with the highest proportion being 'new build of 5 dwellings or more'.

Estimating future trends

New build less than 5 dwellings

Windfalls from this source have varied each year since 2002. However, the average rate between 2002 and 2006/07 (i.e. prior to the economic crash) was higher (16.8 dwellings per annum) than the average rate since 2007 (11.7 dwellings per annum). The SHLAA Panel advises that the economy will continue to depress completions for the next 5 years. It is therefore assumed that windfalls from this source will equate to 11.7 dwellings per annum in Phase 1 and 16.8 dwellings per annum thereafter.

New build of 5 dwellings or more

Again, windfalls from this source have varied since 2002, sometimes considerably. The fact that more than 200 windfalls per annum were completed on sites of 5 or more dwellings between 2010 and 2012 shows that this source has not been negatively affected by the economic downturn. It also suggests that there is a healthy supply of windfalls from this source and there is no reason to assume that this will change in the foreseeable future.

¹⁹ Allocated in the Exeter Local Plan First Review 1995-2011 (or earlier draft versions), or the Exeter Core Strategy (or earlier draft versions).

²⁰ The 2009, 2010, 2013 and revised 2013 versions of the SHLAA.

The average annual delivery rate from sites of 5 or more dwellings is 130.5 dwellings.

However, the Revised 2013 SHLAA identifies 24²¹ sites which would previously have been counted as windfalls. Some sites with planning permission/permission subject to completion of a S106 Agreement would also have previously been counted as windfalls.²² The SHLAA concludes that these sites will yield 1,433 dwellings during the remaining 12-year plan period. This needs to be taken into account when projecting forwards, i.e:

- 131 dwellings x 12 years = 1,572 dwellings from this source over remaining plan period.
- 1,572 – 1,433 dwellings already identified in the SHLAA = 139 dwellings.
- 139 / 12 years = An average of 11.58 dwellings will be delivered each year on sites of 5 or more dwellings.

Conversion/change of use

Again, there is no obvious trend in the rate of variation in windfalls from this source, including a decline since the economic downturn. The average annual rate is 76.18 dwellings, which has in fact been exceeded in seven out of the past eleven years. It would therefore seem reasonable to project this figure forwards.

Summary

Following on from the analysis of windfalls by source, the table below sets out the resulting windfall rate per year projected forwards. This is considered to be a realistic assessment of windfalls sites that are likely to emerge over the remaining Core Strategy plan period.

Year		New build less than 5 dwellings	New build of 5 dwellings or more	COU/conversion	Windfall total
Phase 1	2014/15	11.7	11.58	76.18	99.46
	2015/16	11.7	11.58	76.18	99.46
	2016/17	11.7	11.58	76.18	99.46
	2017/18	11.7	11.58	76.18	99.46
	2018/19	11.7	11.58	76.18	99.46
Phase 2	2019/20	16.8	11.58	76.18	104.56
	2020/21	16.8	11.58	76.18	104.56
	2021/22	16.8	11.58	76.18	104.56
	2022/23	16.8	11.58	76.18	104.56
	2023/24	16.8	11.58	76.18	104.56
Phase 3	2024/25	16.8	11.58	76.18	104.56
	2025/26	16.8	11.58	76.18	104.56
TOTAL		176.1	139	914.16	1229

²¹ Sites 3, 7, 9, 16, 23, 53, 66b, 84, 89, 94, 98, 101-103, 105 and 108-15.

²² i.e. Sites listed in Schedule 1 of Appendix 4 which have not been allocated for development of identified in past SHLAA.