



**Exeter City Council**

**STRATEGIC HOUSING  
LAND AVAILABILITY ASSESSMENT  
(SHLAA)**

**August 2009**

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## INTRODUCTION

- 1.1 Planning Policy Statement 3: Housing (PPS3) sets out the national planning policy framework for delivering the Government's housing objectives. In particular, it sets out a framework to improve the affordability and supply of houses in all communities, by ensuring that land availability is not a constraint on the delivery of homes. To this effect, local planning authorities (LPAs) are required firstly to identify and maintain a rolling five year supply of deliverable land for housing, and secondly to identify sufficient land for housing for at least the first 10 years, and ideally years 11-15, of their Development Plan.
- 1.2 To fulfil these requirements, PPS3 calls for LPAs to prepare Strategic Housing Land Availability Assessments to identify and monitor, against strategic housing requirements, current and future land availability for housing.
- 1.3 This is the first Strategic Housing Land Availability Assessment (SHLAA) for Exeter. It has been prepared in accordance with PPS3 and the accompanying Strategic Housing Land Availability Assessments Practice Guidance (the Practice Guidance). It has also been guided by the Methodology For SHLAA In The Exeter Housing Market Area (see Appendix A and section 4.0 below). A self-assessment of the soundness of the SHLAA is set out at Appendix B.

## 2.0 ROLE OF THE SHLAA

- 2.1 The SHLAA identifies sites within Exeter that have the potential to be developed for housing. It assesses the total number of new dwellings that could be achieved on each site and estimates when they could be developed. The findings of the SHLAA are indicative only.
- 2.2 The SHLAA forms a key part of the evidence base for the emerging Exeter Local Development Framework (LDF) Core Strategy, which sets out the Council's vision, strategic objectives, spatial strategy and core policies for the period 2006 to 2026. It will also be used to inform the preparation of other LDF documents ('Development Plan Documents', or DPDs) produced by the Council, including those that allocate land for housing development.
- 2.3 The base date for this SHLAA is 1 April 2009 and it covers the period to 2026. This is to ensure that the Council has an understanding of housing potential in Exeter for the lifetime of the Development Plan (see section 3.0 below for further details about the Development Plan).
- 2.4 The sites identified by this SHLAA can be broadly divided into three categories:
  - **Deliverable sites** are those that are known to be available now, are in a suitable location for housing and have a reasonable prospect of being developed (or being 'achievable') for housing within the five year period from 1 April 2009<sup>1</sup>. In accordance with an advice note published by the

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<sup>1</sup> The definition of a 'deliverable site' and the terms 'available', 'suitable' and 'achievable' are derived from paragraph 33 of the Practice Guide.

Department for Communities and Local Government (DCLG)<sup>2</sup>, these sites include extant planning permissions and outstanding Development Plan allocations, together with unallocated brownfield sites that in principle are compliant with planning policy in the Development Plan (i.e. in general, brownfield land within the existing urban area).

- **Developable sites** are those that are, or are likely to become available for housing development in the longer term, which satisfy broad suitability criteria set out in the SHLAA Methodology and have a reasonable prospect of being developed by 2026<sup>3</sup>;
- **Undevelopable sites** (in the context of the SHLAA) are those that do not pass the test of suitability and/or are considered to be unavailable and/or unachievable for housing development before 2026. These sites are not included in the final supply of SHLAA sites that are identified as deliverable or developable.

2.5 In identifying potential sites for housing, the SHLAA assesses:

- the likely amount of housing that could be provided from extant planning permissions; and
- land availability, by identifying:
  - sites (both brownfield/previously developed and greenfield) that have development potential for housing;
  - the potential number of dwellings that could be provided on these sites;
  - any constraints affecting the sites; and
  - any action that could be taken to overcome the constraints.

### **Status of the SHLAA**

2.6 The Exeter SHLAA will be used to help monitor and manage the supply of land for housing and the delivery of such housing. It will be reviewed annually, with the aim of identifying a 'rolling' five year supply of deliverable land for housing (see Section 11.0). It will form the basis of the Council's housing trajectory in the Annual Monitoring Report, illustrating the Council's delivery of housing compared to the strategic requirements set out in the Development Plan (see Section 3.0). It should only be necessary to prepare an entirely 'new' SHLAA if DPDs have to be reviewed and rolled forward to a longer time horizon, or other significant changes make it necessary.

2.7 The SHLAA is only one part of the LDF evidence base. It is a technical document and does not create planning policy. Although the SHLAA may identify a site as 'suitable' for housing, this does not necessarily mean that its development for housing will be acceptable to the Local Planning Authority, or preclude it from being developed for other suitable uses. All potential housing sites that are identified in the SHLAA will be subject to more rigorous suitability testing through the plan-making process or, indeed, through detailed consideration if a planning application is submitted.

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<sup>2</sup> The advice note is published on the Planning Inspectorate's website: [http://www.planning-inspectorate.gov.uk/pins/advice\\_for\\_insp/advice\\_produced\\_by\\_dclg.htm](http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm).

<sup>3</sup> The definition of a 'developable site' is derived from paragraph 33 of the Practice Guide.

- 2.8 The SHLAA may be used to support the determination of planning applications in Exeter by providing the information required to effectively manage the delivery of housing. Key to this management will be the demonstration of a five year supply of deliverable land for housing, as required by PPS3.

### **3.0 STRATEGIC PLANNING CONTEXT**

- 3.1 This 2009 SHLAA has been prepared in the context of the Development Plan for Exeter.
- 3.2 For the purposes of the SHLAA, the Development Plan comprises the emerging South West Regional Spatial Strategy (2006-2026) (RSS) and saved policies in the Exeter Local Plan First Review 1995-2011 (adopted 2005). Saved policies in the Local Plan will be superseded by the Exeter Local Development Framework (LDF), including the Core Strategy, which is timetabled for submission to the Secretary of State in the summer of 2010.
- 3.3 The Development Plan is important because it provides the strategic policy context for identifying deliverable and developable sites. It also sets the housing requirement for Exeter. The Panel Report on the draft RSS proposed that 12,000 additional dwellings should be provided in Exeter between 2006 and 2026, but the Secretary of State's Proposed Changes increased this to 15,000 dwellings. The SHLAA assumes that the 15,000 requirement will be retained in the RSS when it is adopted and is therefore structured to try and address this requirement. However, this does not imply acceptance of 15,000 dwellings by the City Council.

### **4.0 METHODOLOGY**

#### **Exeter Housing Market Area**

- 4.1 The Practice Guidance advocates the preparation of SHLAA at housing market level, where possible. Exeter City Council forms part of the Exeter Housing Market Area (EHMA), together with East Devon District Council, Mid Devon District Council, Teignbridge District Council and the Dartmoor National Park Authority. It has not been practicable to prepare a single SHLAA for the EHMA at this time, principally due to the different LDF timescales of each of the constituent local authorities (partner authorities).
- 4.2 However, the partner authorities have developed a Methodology for the preparation of SHLAA within the EHMA (see Appendix A to this document). Paragraph 1.3 of the EHMA Methodology (hereafter referred to as the 'Methodology') explains how it has been developed, including public involvement at the draft stage. The Methodology follows and adds further detail to a 'standard' methodology suggested in the Practice Guidance. For the avoidance of repetition, the SHLAA does not provide detailed commentary on each aspect of the Methodology.
- 4.3 The Practice Guidance states that if a local authority follows the standard methodology, then it should not be necessary to justify how it has prepared its SHLAA, including at independent examination. The SHLAA has been prepared in accordance with the Methodology and, thereby, the Practice Guidance's standard methodology. Where an approach is taken that is specific to Exeter, this is explained in the SHLAA.

- 4.4 The partner authorities are also looking to standardise future SHLAA reports, so that they may be more easily compared.

### SHLAA Panel

- 4.5 The Practice Guidance emphasises the importance of a partnership approach to preparing SHLAAs, involving key stakeholders. The partner authorities have therefore worked with a Panel of key stakeholders including house builders, registered social landlords, property agents and community and environmental groups, who have acted in an advisory capacity and helped to guide the preparation of all of the partner authorities' SHLAAs. Panel Membership for the Exeter SHLAA is set out in Table 1 below. The role and responsibilities of the Panel are explained in further detail in the Methodology, which incorporates a 'SHLAA Panel Constitution and Terms of Reference'.

|   |  |
|---|--|
| Volume house builder, including one national and one regional company | Barratt Homes<br>Millwood Homes  |
| Small scale house builder   | K F Farleigh Ltd<br>Stevens Homes<br>Gadd Group<br>South West Construction                           |
| Land agent  | Rendells<br>Stags  |
| Registered Social Landlord  | Devon and Cornwall Housing Group<br>Sovereign Housing Group  |
| Architect, urban designer or other profession                         | Bell Cornwell<br>Harcourt Kerr   |
| Agencies  | Environment Agency<br>Highways Agency<br>Highway Authority (Devon County Council)<br>Natural England |
| Community   | Exeter Civic Society   |

- 4.5 Prior to the production of this SHLAA, three Panel meetings were held. The meetings were used to refine the Methodology<sup>4</sup> and seek the Panel's views on the assessment of sites and related issues. The views of the Panel were considered in full during the SHLAA's production.

### State of the housing market

- 4.6 The Exeter SHLAA has been prepared at a time when the housing market and wider UK and global economy are experiencing a period of recession. The property and construction industries have been directly and significantly affected by the current economic conditions. The housing market has slowed rapidly.
- 4.7 The Practice Guidance is clear that economics should be taken into account in the preparation of SHLAAs, to ensure that assessments of land supply are as realistic as possible (see paragraph 40 of that document). There is currently no national guidance on precisely how to do this. As the housing market is subject to change, the Methodology leaves it to the individual

<sup>4</sup> Panel meetings for Teignbridge District Council's SHLAA were held in early-mid 2008 and were used, in part, to help develop the Methodology.

partner authorities to determine precisely how it is taken into account in their respective SHLAAs.

- 4.8 The Exeter SHLAA has been prepared using two approaches, both of which take economics into consideration. Based on the advice of the Panel, the first approach assesses potential housing land supply taking the impact of the current economic recession into account.
- 4.9 However, a Planning Inspector has advised the Council that this first approach has limitations, because it shows what happens when housing supply is driven primarily by short term financial restrictions, rather than whether (or not) the planning system has identified sufficient land for potential development. The Inspector has therefore advised that the SHLAA should also assess potential housing land supply in the context of 'normal' economic conditions prevailing on balance throughout the plan period. The Inspector and Council consider that this second approach more truly demonstrates whether or not Exeter's strategic housing needs can be met on suitable, available and achievable sites.
- 4.10 The differences between the two approaches are explained in further detail in paragraphs 5.16-5.21 below. Section 6.0 of this report goes on to assess housing land supply taking the current economic recession into account, whilst Section 7.0 assesses supply assuming normal market conditions throughout the plan period.

## **5.0 IDENTIFYING SITES AND THE ASSESSMENT PROCESS**

### **Identifying Sites**

- 5.1 The Council is confident that as many sites as possible have been identified for assessment in the 2009 SHLAA. Sites assessed have been identified from the sources listed in paragraph 5.3 below. PPS3 and the Practice Guidance are clear that SHLAAs should be dynamic and on-going. As such, this first SHLAA for Exeter will be revisited through annual review, giving the opportunity for further sites to be identified and assessed as deliverable or developable.
- 5.2 In accordance with Table 1 of the Methodology, the sites that have been identified include those that are already in the planning process (e.g. sites with extant planning permission and site allocations) and those that are not.
- 5.3 The sites have been identified from the following sources:
- The Council's publication entitled 'Housing Planning Permissions and Completions' (2009), to determine all sites with extant planning permission for housing at 31 March 2009;
  - All remaining residential and non-residential land allocations in the Exeter Local Plan First Review;
  - Representations received during the Issues and Options and Preferred Options Consultations on the LDF Core Strategy;
  - All sites listed in Schedule A of the Exeter Urban Capacity Study (2006);
  - The Council's publication entitled 'Employment Planning Permissions and Completions' (2009), to determine all sites with extant planning permission for employment at 31 March 2008;

- The Register of Surplus Public Sector Land (March 2008), produced by English Partnerships; and
  - A 'call for sites'.
- 5.4 The 'call for sites' took place over a six week period in January-March 2008. It was advertised through a press release, on the Council's website and by writing to organisations and individuals on the Council's LDF Database who are landowners and/or who have an interest in residential development. During this period, the public, landowners and agents were invited to complete a 'Potential Housing Site Proforma' (replicated in Appendix 1 to the Methodology). The call resulted in over fifty additional sites being identified for assessment. Proforma were also sent to those with an interest in sites identified through the other sources listed in paragraph 5.3.

### **Availability Assessment**

- 5.5 The Practice Guidance indicates that a site should be considered available for development where it is controlled by a developer who has expressed an intention to develop, or the landowner has expressed an intention to sell. To ensure a robust assessment of availability, the proforma developed by the partner authorities provides for an indication as to whether or not sites are available for development and the timeframe within which this may occur.
- 5.6 Excluding those with extant planning permission, the Council received completed proforma indicating that 70 sites from the sources listed in paragraph 5.3 are available for housing development in the period to 2026. Appendices C, D(i) and D(ii) provide details of all of these sites, including location plans (in C).
- 5.7 The Council received very few completed proforma for sites with extant planning permission for housing. However, the general assumption is that these sites are likely to be available for development, by virtue of the fact that they have planning permission. The sites are listed in the schedule at Appendices E(i) and E(ii). Maps showing the location of these sites are provided in the Council's publication entitled 'Housing Planning Permissions and Completions' (2009).

### **Suitability Assessment**

- 5.8 The Practice Guidance states that a site should be considered suitable for housing if it offers a suitable location for development that would contribute to the creation of sustainable mixed communities. It goes on to state that policy restrictions should be considered to assess a site's suitability for housing now or in the future.
- 5.9 The SHLAA Methodology adopts a two-stage approach to assessing the suitability for housing development of sites without extant planning permission. The first stage discounts as 'undevelopable' any sites (or parts of sites) where development would:
- not accord with strategic planning policy;
  - have an adverse impact on international or national biodiversity or geodiversity designations (i.e. SSSIs, SACs, Ramsar sites and SPAs), that could not be mitigated against; or

- be at potentially high flood risk (on grounds that it would be within Flood Zone 3b, as defined in the Exeter Strategic Flood Risk Assessment 2008).
- 5.10 In terms of the first bullet point, the Local Plan's saved policies promote residential development within Exeter's existing urban area and on the eastern side of the City (specifically in the Newcourt area). Strategic planning policy in the emerging RSS also promotes residential development within the existing urban area and, in addition, states that provision for 'sustainable housing growth' should be made on the eastern and south-western sides of the City. The sites that have been assessed and then discounted on strategic planning policy grounds are those located outside the existing urban area and the strategic areas for growth to the east and south-west of Exeter<sup>5</sup>.
- 5.11 Sites that have not been discounted following assessment at stage one are then subject to more detailed assessment against the following criteria:
- Potential impact upon the built environment, landscape character, minerals resources, air quality, water Source Protection Zones, open space and recreation facilities, employment land, highways access, pedestrian and cycle links;
  - Access to service and facilities;
  - Land status;
  - Compatibility with existing and/or proposed adjoining uses;
  - Potential infrastructure requirements; and
  - Other development constraints.
- 5.12 The SHLAA does not judge the relative suitability of sites. Sites that have been assessed as suitable by the SHLAA may still be subject to constraints that would need to be overcome prior to development. In accordance with the Practice Guidance, the suitability assessment identifies these constraints as far as possible, together with potential mitigation measures.
- 5.13 The results of the suitability assessment of sites without extant planning permission are set out in detail in Appendix C. They are also summarised in the 8<sup>th</sup> column of Appendices D(i) and D(ii). The Panel have had an opportunity to comment on the suitability of each site and their advice is taken into account in the results.
- 5.14 Sites with extant planning permission have not been subject to assessments of suitability. This is partly due to the resources available, but mainly because, by virtue of their planning permissions, it is reasonable to assume that they are suitable for housing.

### **Achievability Assessment**

- 5.15 The Practice Guidance states that a site should be considered 'achievable' if there is a reasonable prospect that it will be developed for housing at a particular point in time. This largely involves judging the economic viability of the site and the capacity of a developer to then complete and sell the homes over a certain period.

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<sup>5</sup> Sites 1, 6, 10, 11, 13, 21, 29, 31, 32 and 70 in Appendices C and D(i and ii).

- 5.16 The SHLAA assesses site achievability in two ways, based on the different approaches set out in paragraphs 4.8 and 4.9 above. It firstly looks at achievability taking the current economic recession into account. Based on advice given by the Panel, this includes an assumption that the 'standard' completion rates provided for in the Methodology (see paragraph 5.23 of that document) will halve over the next five years, whilst the economy remains depressed and/or recovers, but will return to 'normal' from Year 6 onwards. Secondly, on the advice of the Planning Inspector, it assesses achievability on the assumption that 'normal' economic conditions will exist on balance throughout the plan period. The second approach assumes that the Methodology's standard completion rates will prevail throughout that period.
- 5.17 In both cases, assessments of achievability have also been informed by factors including:
- site preparation costs, bearing in mind any physical constraints identified in the suitability assessment and during site visits that Panel Members and Council officers may have made; and
  - development costs related to existing and emerging planning policy (e.g. affordable housing, infrastructure requirements and the Code for Sustainable Homes).
- 5.18 The results of the achievability assessment of sites without extant planning permission are set out in detail in Appendix C. The results are also summarised in the 10<sup>th</sup> column of Appendix D(i) and (ii). In only one case is it concluded that the timing of a site's achievability will differ depending on which of the two approaches in 5.16 above are taken<sup>6</sup>.
- 5.19 Given the time and resources available, individual achievability assessments for the sites with extant planning permission (or permission subject to the completion of a S106 Agreement) have not been undertaken.
- 5.20 Instead, to determine potential housing delivery under normal market conditions, the SHLAA assumes development of these sites will commence in Years 1-5 unless the applicant/landowner has advised the Council that they do not intend to implement the permission<sup>7</sup>. It also assumes that completion rates on these sites will be as per the Methodology's standards. Appendix E(ii) shows the results of applying these assumptions to all extant planning permissions for housing at 31 March 2009.
- 5.21 To determine potential housing delivery from these sites taking the current economic recession into account, the Panel have advised the use of an alternative set of assumptions. These assumptions (which include a halving of the completion rate in Years 1-5) are set out in the model at Appendix F. Appendix E(i) shows the results of applying these assumptions to all extant planning permissions for housing at 31 March 2009. The assumptions will be reviewed in future SHLAA updates.

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<sup>6</sup> See Site 51 in Appendices C, D(i) and (ii).

<sup>7</sup> See Sites 1066 and 1125 in Appendix E(ii)

## Assessment of potential housing yield

- 5.22 All of the 70 available sites without extant planning permission for housing have been assessed to determine how many dwellings they could potentially yield (this is unnecessary for sites with extant planning permission, as their yields are determined by the permission). The Methodology provides an approach for assessing yield, based on applying standard gross to net development area ratios and densities. However, it allows the partner authorities to depart from this where it can be justified.
- 5.23 Evidence from extant planning permissions at 31 March 2009 provides justification for Exeter's SHLAA to depart from the Methodology's standard ratios (see Appendix G). The evidence suggests that, in general, sites with extant permission that measure up to 1 ha gross have a net developable area for housing of 100% (i.e. the whole site is developable), whilst sites measuring 1 ha or more have an average net developable area of 80%<sup>8</sup>.
- 5.24 The yields of the 70 available sites have been determined using these 'Exeter specific' standards, except where an individual site's suitability assessment indicates that an alternative ratio is appropriate due to identified constraints. For example, to take into account the significant landscape sensitivity constraints and green infrastructure requirements of the Monkerton/Hill Barton area as a whole, it has been assumed that a number of its larger greenfield sites have a net developable area of only 60%. The gross area and indicative net developable area of each site are set out in the heading to each detailed site assessment in Appendix C. Where a net developable area departs from the 'Exeter specific' standards described in paragraph 5.23 above, this is explained in the individual site assessment.
- 5.25 Rather than using the density standards in the Methodology, the yields of the 70 sites have then generally been determined by applying the following standards to the net developable areas. These are derived from Policy H2 of the emerging RSS. Their use in place of the Methodology's standards is justified on grounds that the latter are taken from an earlier draft of the RSS:
- Sites in the City centre: 101+ dph
  - Sites at edge of City centre: 50 to 100 dph
  - Urban extension sites: 50 dph
  - All other sites: 40 to 50 dph
- 5.26 Exceptions to this approach have been made where the knowledge of Council Officers and/or Panel Members suggest a different density would be more appropriate.
- 5.27 The resulting minimum and maximum potential yields of each site are set out in the heading to each detailed site assessment in Appendix C. The headings also indicate the density range used to calculate the potential minimum and maximum yields of each site, making it clear whether they reflect or depart from the standards in paragraph 5.25 above. Where the range departs from

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<sup>8</sup> In accordance with PPS3, 'net developable area' includes areas which will be developed for housing and directly associated uses, including internal access roads within the site, gardens, car parking, children's open space and incidental amenity space. It excludes main roads, buffer zones, structural landscaping, general open space and other uses such as schools and shops.

the standard, justification is provided in the individual site assessment. Assessment of the 70 sites in the remainder of this SHLAA report is based on their 'mid-point' yields.

## **6.0 CALCULATING THE POTENTIAL HOUSING LAND SUPPLY, TAKING THE CURRENT ECONOMIC RECESSION INTO ACCOUNT**

- 6.1 This section assesses potential housing market supply in Exeter to 2026, taking into account the current recession in the housing market and the Panel's predictions for the future.
- 6.2 Section 6.0 is divided into two parts, which look in turn at the requirements of the SHLAA set out in paragraph 1.1 above. The first part deals with the SHLAA's findings in terms of identifying a five year supply of deliverable sites for housing in Exeter. The second part looks at the supply of deliverable and developable land for housing over the longer plan period.

### **Five Year Supply of Deliverable Sites**

- 6.3 PPS3 requires the Council to demonstrate it has a five year supply of 'ready to develop' sites for new housing, in relation to the RSS strategic housing requirement.
- 6.4 As set out in 2.4 above, the SHLAA demonstrates the supply of sites that may be deliverable in the next 5 years based on the DCLG's advice note.
- 6.5 The DCLG's advice note clarifies that five year housing land supply assessments should consider sites in the following three categories:
- (i) *Sites allocated for housing in the current Development Plan*
- 6.6 Of the sites allocated for housing (or for a mix of uses including housing) in the saved policies of the Exeter Local Plan First Review, seven remained undeveloped and without planning permission (or permission subject to the completion of a S106 Agreement) at 31 March 2009:

| <b>Address</b>   | <b>SHLAA Site Ref</b> |
|--|-----------------------|
| Allotment Gardens, Marypole Road   | 2000                  |
| Yeo and Davey, Old Tiverton Road   | 2001                  |
| Fire Station, Howell Road  | 2002                  |
| Quay/Canal Basin Area  | 17                    |
| Exeter St David's Station, Bonhay Road   | 7                     |
| HMS Pellew, Dryden Road  | 48                    |
| Land at Beech Cottage, Old Rydon Lane (part of the 'North of Old Rydon Lane' allocation in the Local Plan) | 59                    |

- 6.7 Of these, it is known or assumed that the first three are unavailable for development. Further details of these three sites and the reasons why they are not included in the SHLAA's housing calculations are provided in the schedule at Appendix H.
- 6.8 The Council has received confirmation that one site within the Quay/Canal Basin Area and the final three sites in the list will be available for development during the plan period. These sites have been subjected to detailed

assessments of suitability and achievability<sup>9</sup>. The assessments conclude that Exeter St David's Station, Bonhay Road and Land at Beech Cottage, Old Rydon Lane (highlighted) could contribute to the deliverable five year housing land supply.

- 6.9 'Sites allocated for housing in the development plan' also includes sites located in the strategic areas for growth to the east and south-west of Exeter, as identified by the emerging RSS, albeit that the RSS does not allocate specific sites for housing.
- 6.10 The availability of the following twenty-six sites located in the strategic growth areas that are not Local Plan housing allocations and did not have planning permission (or permission subject to the completion of a S106 Agreement) at 31 March 2009 have been confirmed:

| Address   | SHLAA Site Ref |
|---|----------------|
| Land south of Alphington                          | 18             |
| Land north of Markham Lane                        | 19             |
| Land west of Chudleigh Road                       | 20             |
| Land south of the Pinn Brook                      | 34             |
| Land north and south of Tithebarn Lane            | 35             |
| Land at junction of Tithebarn Lane and Gipsy Lane | 36             |
| Sandrock Nursery, Pinn Lane                       | 37             |
| Land south of Gipsy Hill Lane                     | 38             |
| Land at Monkerton                                 | 39             |
| Land north and south of Harts Lane                | 40             |
| Land west of Pilton Lane                          | 41             |
| Land adjacent Higher Furlong, Hollow Lane         | 42             |
| Hessary, Hollow Lane                              | 43             |
| Land at Hill Barton Farm                          | 44             |
| Land east of Hill Barton Road                     | 45             |
| Hill Barton Farm, Hill Barton Road                | 46             |
| Land north of Honiton Road                        | 47             |
| Land south of the A379                            | 58             |
| Land east of the railway, Old Rydon Lane          | 60             |
| Land south of Old Rydon Lane                      | 61             |
| Exeter Golf and County Club Practice Ground       | 62             |
| Land north of Topsham Road                        | 63             |
| Land east and west of the M5, Topsham/Exeter Road | 66             |
| Yeoman's Gardens, Newcourt Road, Topsham          | 67             |
| Land north of Newcourt Road, Topsham              | 68             |
| Land north of Exeter Road, Topsham.               | 69             |

- 6.11 Having assessed each one for suitability and achievability, the SHLAA concludes that nineteen (those highlighted) could contribute to the deliverable five year housing land supply, taking the current economic recession into account<sup>10</sup>.

(ii) *Sites with extant planning permission (outline and full)*

<sup>9</sup> See Appendices C and D(i) for further details.

<sup>10</sup> See Appendices C and D(i) for further details.

- 6.12 Details of all sites with extant planning permission for housing (including those awaiting the completion of a S106 Agreement and those where development has commenced) at 31 March 2009 are set out in Appendix E(i). The approach described in paragraph 5.21 above has been used to assess how many of these permissions will be implemented under the current market recession and thereby how many of the sites may be delivered in the next five years.
- (iii) *Specific unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the five year period*
- 6.13 This category covers sites that are brownfield and could therefore come forward as 'windfalls', without first being allocated for housing in the Development Plan.
- 6.14 Sites falling within this category have been identified from Schedule A of the 2006 Urban Capacity Study, consultation responses to the Core Strategy, the Register of Surplus Public Sector Land and the 'call'.
- 6.15 Of the brownfield sites that can be identified from these sources (that have not already been identified through categories i or ii above), the following thirty-two remained undeveloped and without planning permission (or permission subject to the completion of a S106 Agreement) for housing at 31 March 2009:

| <b>Address</b>                                       | <b>SHLAA Site Ref</b> |
|--|-----------------------|
| St David's Institute, St David's Hill                | 2003                  |
| St Nicholas Combined School, Matford Lane            | 2004                  |
| Excelsior Garage, 136 Cowick Lane                    | 2005                  |
| Frickers Yard, Well Bank, Willey's Avenue            | 2006                  |
| The Mobility Centre, Wonford Road                    | 2008                  |
| Land at Rifford Road                                 | 2009                  |
| Land off King William Street                         | 2010                  |
| Railway Land and Buildings, Topsham                  | 2012                  |
| Surplus scrubland adjoining housing, Exeter          | 2013                  |
| Exwick Middle School, Higher Exwick Hill             | 3                     |
| Former Guide Dogs for the Blind Kennels, Exwick Lane | 4                     |
| Foxhayes First School, Gloucester Road               | 5                     |
| Harepath, Streatham Rise                             | 8                     |
| Nos. 36-38 Well Street                               | 9                     |
| Garages & Land, Taunton Close                        | 12                    |
| Nos. 8 & 10 Church Rd, Alphington                    | 14                    |
| Exeter Bus & Coach Station Garages, Belgrave Rd      | 15                    |
| Exeter Royal Academy for Deaf Education, Topsham Rd  | 16                    |
| Land off Merlin Crescent                             | 22                    |
| Exmouth Junction, Prince Charles Road                | 23                    |
| Nos. 35-39 Summer Lane                               | 25                    |
| Council Yard, Leypark Rd                             | 27                    |
| Nos. 102-108 Leypark Rd                              | 28                    |
| Ibstock Brick, Harrington Lane                       | 30                    |
| Land adjacent no. 3 Pinn Lane                        | 33                    |
| Council Yard and Clinic, Shakespeare Road            | 49                    |
| St Loyes College, Topsham Rd                         | 50                    |

|   |    |
|---|----|
| Land at Aspen Close                         | 51 |
| Land adjacent Exeter Arms Hotel, Rydon Lane | 54 |
| Car Park north of Digby Drive               | 55 |
| Bishop Court Sand Quarry, Sidmouth Road     | 56 |
| Garages & Land off Newport Rd.              | 65 |

6.16 Of the sites in this list, the first nine are known or assumed to be unavailable for development. Further details of these nine sites and the reasons why they are not included in the SHLAA's housing calculations are provided in the schedule at Appendix H.

6.17 The remaining sites in the list are known to be available and have been subjected to assessments of suitability and achievability<sup>11</sup>. The assessments conclude that eleven of these sites (those highlighted) may contribute to the deliverable five year housing land supply under the current market recession.

6.18 Table 2 below summarises the total number of dwellings that are predicted to come forward on deliverable sites in the five year period from 1 April 2009, taking the current market recession into account. These amount to **2,797 dwellings**.

| <b>Table 2: Summary of the number of dwellings predicted to come forward on deliverable sites over five years, from 1 April 2009, taking market conditions into account</b> |  |                |                |                |                |                        |
|---|--|----------------|----------------|----------------|----------------|------------------------|
| <b>Source</b>   | <b>Year (potential no. of dwellings that could be completed)</b> |                |                |                |                | <b>Total 2009-2014</b> |
|   | <b>2009/10</b>   | <b>2010/11</b> | <b>2011/12</b> | <b>2012/13</b> | <b>2013/14</b> |                        |
| Sites with extant permission that are under construction  | 182  | 141            | 98             | 68             | 50             | 539                    |
| Sites of 15+ dwellings with extant permission, that have not yet started  | 132  | 237            | 177            | 105            | 66             | 717                    |
| Sites of less than 15 dwellings with extant permission, that have not yet started <sup>12</sup>   | 73   | 73             | 73             | 72             | 72             | 363                    |
| Remaining housing allocations in the Development Plan (mid point yield)   | 0  | 12             | 111            | 333            | 472            | 928                    |
| Specific unallocated brownfield sites (mid point yield)   | 0  | 72             | 66             | 50             | 62             | 250                    |
| <b>TOTAL</b>  | <b>387</b>   | <b>535</b>     | <b>525</b>     | <b>628</b>     | <b>722</b>     | <b>2,797</b>           |

6.19 As discussed in paragraph 3.3, the RSS sets Exeter's strategic housing allocation at 15,000 dwellings, to be provided between 2006 and 2026. This allocation forms the basis to determine Exeter's five year housing supply requirement.

<sup>11</sup> See Appendices C and D(i) for further details.

<sup>12</sup> Appendix E(i) indicates completions of 356 dwellings in 2009/10 (Year 1), 7 dwellings in 2010/11 (Year 2) and 0 dwellings thereafter to Year 5. In reality, it is more likely that completion of the total number of dwellings (363) will be spread across the 5 years. This is reflected in Table 2.

- 6.20 Between 1 April 2006 and 31 March 2009 (the latest date for which the Council has housing completions data), 1,817 of the 15,000 dwellings had been completed. This leaves 13,183 dwellings to be provided between 1 April 2009 and 31 March 2026, or an annual average delivery rate of 775 dwellings.
- 6.21 This gives a requirement for 3,877 dwellings for the five year period from April 2009 to 31 March 2014. These figures are summarised in Table 3 below.

| <b>Table 3: RSS housing requirement for Exeter 2006-2026</b> |   | <b>Dwellings</b> | <b>Average Dwellings Per Annum</b> |
|--|---|------------------|------------------------------------|
| a)   | Housing requirement 2006-2026                                       | 15,000           | 600                                |
| b)   | Net additions to stock 2006-2009                                    | 1,817            | -                                  |
| c)   | Residual requirement for 2009-2026 (a-b) (i.e. 17 year requirement) | 13,183           | 775                                |
| d)   | Requirement for 5 years from 1 April 2009                           | 3,877            | -                                  |
| e)   | Requirement for 10 years from 1 April 2009                          | 7,755            | -                                  |
| f)   | Requirement for 15 years from 1 April 2009                          | 11,632           | -                                  |

- 6.22 The assessed potential supply of 2,797 dwellings on deliverable sites indicates that there could be a **shortfall of 1,080 dwellings** at the end of the five year period. 2,797 dwellings represents a **supply of 3 years and 7 months of land for new housing on deliverable sites in Exeter** against the estimated five year requirement of the RSS at 31 March 2009. It equates to **72% of the five year requirement**.
- 6.23 The results indicate that, when the current economic recession is taken into account, Exeter does not have a five year supply of deliverable housing land against the requirements of the RSS.

### **Housing land supply over the next 10 years and beyond to 2026**

- 6.24 To calculate the potential supply of housing over 10 years from 1 April 2009, and beyond to 2026 (17 years), it is necessary to estimate the supply from developable sites and add this to the estimated supply from deliverable sites (n.b. the estimated supply from deliverable sites comprises the 2,797 dwellings set out above, plus dwellings that will be completed on deliverable sites after Year 5).
- 6.25 Developable sites are those that are, or are considered likely to become available for housing development by 2026, which satisfy the broad suitability criteria set out in the SHLAA methodology and which have a reasonable prospect of being developed ('achieved') by 2026.
- 6.26 In terms of sites identified from Schedule A of the 2006 Urban Capacity Study, consultation responses to the Core Strategy, the Register of Surplus

Public Sector Land, the 'call' and sites with planning permission for housing at 31 March 2009, those which the SHLAA considers could potentially contribute to the housing land supply from Year 6 onwards (assuming conditions of economic recession in Years 1-5) are as follows<sup>13</sup>:

| <b>Address</b>   | <b>SHLAA Site Ref</b> |
|--|-----------------------|
| Land off St Andrews Road                                 | 2                     |
| Former Guide Dogs for the Blind Kennels, Exwick Hill     | 4                     |
| Exeter St David's Station, Bonhay Road                   | 7                     |
| Nos. 8 and 10 Church Road, Alphington                    | 14                    |
| Exeter Bus and Coach Station Garages, Belgrave Road      | 15                    |
| Exeter Royal Academy for Deaf Education, Topsham Road    | 16                    |
| Isca House, Haven Road                                   | 17                    |
| Land south of Alphington                                 | 18                    |
| Land north of Markham Lane                               | 19                    |
| Land west of Chudleigh Road                              | 20                    |
| Exmouth Junction, Prince Charles Road                    | 23                    |
| Ibstock Brick, Harrington Lane                           | 30                    |
| Land south of the Pinn Brook                             | 34                    |
| Land north and south of Tithebarn Lane                   | 35                    |
| Sandrock Nursery, Pinn Lane                              | 37                    |
| Land at Monkerton  | 39                    |
| Land north and south of Harts Lane                       | 40                    |
| Land west of Pilton Lane                                 | 41                    |
| Land adjacent Higher Furlong, Hollow Lane                | 42                    |
| Hessary, Hollow Lane                                     | 43                    |
| Land at Hill Barton Farm                                 | 44                    |
| Land east of Hill Barton Road                            | 45                    |
| Land north of Honiton Road                               | 47                    |
| HMS Pellew, Dryden Road                                  | 48                    |
| St Loyes College, Topsham Road                           | 50                    |
| Land at Aspen Close                                      | 51                    |
| Land north of West of England School, Topsham Road       | 53                    |
| Car Park north of Digby Drive                            | 55                    |
| Bishops Court Sand Quarry, Sidmouth Road                 | 56                    |
| Land at Beech Cottage, Old Rydon Lane                    | 59                    |
| Land east of the railway, Old Rydon Lane                 | 60                    |
| Land south of Old Rydon Lane                             | 61                    |
| Exeter Golf and Country Club Practice Ground             | 62                    |
| Land north of Topsham Road                               | 63                    |
| Land east and west of the M5, Topsham/Exeter Road (part) | 66                    |
| Former RNSD, Topsham Road                                | 1000                  |
| Former Cold Store, Chancel Lane                          | 1005                  |
| SEF Site and Lower RNSD, Topsham Road                    | 1015                  |
| ORLN Site, Old Rydon Lane                                | 1017                  |

6.27 In addition, PPS3 and the Practice Guidance indicate that LPAs should consider whether land allocated or with unimplemented planning permission for employment could be used more appropriately for housing.

<sup>13</sup> See Appendices C, D(i) and E(i) for further details.

6.28 There are five remaining sites in the Exeter Local Plan First Review that are allocated for employment use (and are not already covered by the sites listed in paragraph 6.26 above), under Policy E1:

| Address                      | SHLAA Site Ref |
|------------------------------|----------------|
| West of Exeter Business Park | 2014           |
| East of Exeter Business Park | 2015           |
| Osprey Road, Sowton          | 2016           |
| Eastern Fields, Pinhoe       | 2017           |
| Land south of the A379       | 58             |

6.29 Of these sites, the first four are known or assumed to be unavailable for housing. Further details of these unavailable sites and the reasons for their 'unavailability' are provided at Appendix H. A proforma has been completed confirming that the fifth site in the list is available. Following a detailed assessment of suitability and achievability, the SHLAA concludes that it is developable for a mix of uses including housing.<sup>14</sup>

6.30 All twenty-five sites with unimplemented planning permission for employment use at 31 March 2009 are considered to be unavailable for housing. Again, details of these unavailable sites and the reasons for their 'unavailability' are given in the schedule at Appendix H<sup>15</sup>.

6.31 Table 4 below summarises the housing potential of identified sites from 1 April 2009 to 31 March 2026 (i.e. the full plan period), assuming that conditions of economic recession will exist in Years 1-5.

| Table 4: Summary of total number of dwellings predicted to come forward on identified sites from 1 April 2009 to 31 March 2026, taking market conditions into account |                          |                           |                            |                            |              |
|---|--------------------------|---------------------------|----------------------------|----------------------------|--------------|
| Source  | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total        |
| Sites with planning permission for housing at 31.03.09.   | 1,619                    | 683                       | 120                        | 0                          | 2,422        |
| Remaining housing allocations in the Dev't Plan (mid point yield)   | 928                      | 3,001                     | 895                        | 59                         | 4,883        |
| Exeter Urban Capacity Study 2006 (mid-point yield)  | 133                      | 212                       | 0                          | 0                          | 345          |
| Reg.of Surplus Public Sector Land (mid-point yield)   | 17                       | 0                         | 0                          | 0                          | 17           |
| Call for sites (mid-point yield)  | 100                      | 661                       | 372                        | 0                          | 1,133        |
| <b>TOTAL</b>  | <b>2,797</b>             | <b>4,557</b>              | <b>1,387</b>               | <b>59</b>                  | <b>8,800</b> |

6.32 The residual RSS housing requirement from 1 April 2009 to 31 March 2026 is estimated to be 13,183 dwellings, giving an annual average of 775 dwellings. As summarised in Table 3 above, from 1 April 2009, this gives a ten year requirement for 7,755 dwellings and a fifteen year requirement for 11,632 dwellings.

<sup>14</sup> See Appendices C and D(i) for further details.

<sup>15</sup> See sites 2018-2042 in Appendix H.

- 6.33 The 2<sup>nd</sup> and 3<sup>rd</sup> columns of Table 4 above indicate an assessed potential housing supply during the ten year period of 7,354 dwellings. This amounts to a **shortfall of 401 dwellings** compared to the ten year requirement and represents a **housing land supply of 9 years and 6 months**. It equates to **97% of the ten year requirement**.
- 6.34 Columns 2-4 of Table 4 indicate an assessed potential housing supply during the fifteen year period of 8,741 dwellings. This amounts to a **shortfall of 2,891 dwellings** compared to the fifteen year requirement and represents a **housing land supply of 11 years and 3 months**. It equates to **75% of the fifteen year requirement**.
- 6.35 Finally, Table 4 shows an assessed potential housing supply over the residual plan period from 2009 to 2026 of 8,800 dwellings. This amounts to a **shortfall of 4,383 dwellings** at the end of the plan period and represents a **housing land supply of 11 years and 4 months**. It equates to **67% of the residual plan period requirement**.

*Summary of assessed housing land supply, taking the current economic recession into account*

- 6.36 In conclusion, taking into account the current recession in the housing market and the Panel's predictions for the future, section 6.0 of the SHLAA indicates that Exeter:
- does not have a five year supply of deliverable land for housing; and
  - does not have sufficient deliverable and developable sites to meet the RSS housing requirement for 10 years, 15 years or for the 17 year residual plan period to 2026.

## **7.0 CALCULATING THE POTENTIAL HOUSING LAND SUPPLY, ASSUMING NORMAL MARKET CONDITIONS**

- 7.1 This section of the SHLAA assesses potential housing market supply in Exeter to 2026, assuming that, on balance, market conditions will be 'normal' during the whole plan period.
- 7.2 This section firstly looks at the SHLAA's findings regarding a five year supply of deliverable sites for housing in Exeter, assuming normal market conditions. It then assesses the supply of deliverable and developable land for housing over the longer plan period.

### **Five Year Supply of Deliverable Sites**

- 7.3 Of the three categories set out in the DCLG advice note (see paragraphs 6.5-6.17 above), the SHLAA concludes that normal market conditions will potentially result in one additional site being delivered in Years 1-5, compared to the situation under a market recession ('Land at Aspen Close')<sup>16</sup>. It also concludes that the yield of 'Nos. 36-38 Well Street' will be slightly higher during Years 1-5 compared to the situation under an economic recession<sup>17</sup>. The main reason why the figures in Table 5 below are higher than those in

<sup>16</sup> See site 51 in Appendices C and D(ii).

<sup>17</sup> See site 9 in Appendices C and D(ii).

Table 2 is that the assumed completion rate in Years 1-5 is lower under an economic recession than under normal market conditions (see 5.16, 5.20 and 5.21 above).

- 7.4 Table 5 below summarises the total number of dwellings that are predicted to come forward on deliverable sites in the five year period from 1 April 2009, assuming normal market conditions. These amount to **4,107 dwellings**.

| <b>Table 5: Summary of the number of dwellings predicted to come forward on deliverable sites over five years, from 1 April 2009, under normal market conditions</b> |  |                |                |                |                |                        |
|--|--|----------------|----------------|----------------|----------------|------------------------|
| <b>Source</b>  | <b>Year (potential no. of dwellings that could be completed)</b> |                |                |                |                | <b>Total 2009-2014</b> |
|  | <b>2009/10</b>   | <b>2010/11</b> | <b>2011/12</b> | <b>2012/13</b> | <b>2013/14</b> |                        |
| Sites with extant permission that are under construction   | 264  | 196            | 102            | 50             | 50             | 662                    |
| Sites of 15+ dwellings with extant permission, that have not yet started   | 302  | 392            | 161            | 100            | 100            | 1,055                  |
| Sites of less than 15 dwellings with extant permission, that have not yet started <sup>18</sup>  | 73   | 73             | 73             | 72             | 72             | 363                    |
| Remaining housing allocations in the Development Plan (mid point yield)  | 0  | 15             | 225            | 651            | 762            | 1,653                  |
| Specific unallocated brownfield sites (mid point yield)  | 0  | 122            | 45             | 82             | 125            | 374                    |
| <b>TOTAL</b>   | <b>639</b>   | <b>798</b>     | <b>606</b>     | <b>955</b>     | <b>1,109</b>   | <b>4,107</b>           |

- 7.5 The assessed potential supply of 4,107 dwellings on deliverable sites indicates that there could be a **surplus of 230 dwellings** at the end of the five year period from 1 April 2009, compared with the RSS requirement for 3,877 dwellings to be provided (see Table 3 above). 4,107 dwellings represents a **supply of 5 years and 4 months of land for new housing on deliverable sites in Exeter**, against the estimated five year requirement of the RSS at 31 March 2009. It amounts to **106% of the five year requirement**.
- 7.6 The results indicate that, under normal economic conditions, Exeter has a five year supply of deliverable housing land against the requirements of the RSS.
- Housing land supply over the next 10 years and beyond to 2026**
- 7.7 In terms of sites identified from Schedule A of the 2006 Urban Capacity Study, consultation responses to the Core Strategy, the Register of Surplus Public Sector Land, the 'call' and sites with planning permission for housing at 31 March 2009, those which the SHLAA considers could potentially contribute

<sup>18</sup> Appendix E(ii) indicates completions of 363 dwellings in 2009/10 (Year 1) and 0 dwellings thereafter to Year 5. In reality, it is more likely that completion of the total number of dwellings (363) will be spread across the 5 years. This is reflected in Table 5.

to the housing land supply from Year 6 onwards (assuming normal economic conditions in Years 1-5) are as follows<sup>19</sup>:

| <b>Address</b>   | <b>SHLAA Site Ref</b> |
|--|-----------------------|
| Land off St Andrews Road                                 | 2                     |
| Former Guide Dogs for the Blind Kennels, Exwick Hill     | 4                     |
| Exeter St David's Station, Bonhay Road                   | 7                     |
| Nos. 8 and 10 Church Road, Alphington                    | 14                    |
| Exeter Bus and Coach Station Garages, Belgrave Road      | 15                    |
| Exeter Royal Academy for Deaf Education, Topsham Road    | 16                    |
| Isca House, Haven Road                                   | 17                    |
| Land south of Alphington                                 | 18                    |
| Exmouth Junction, Prince Charles Road                    | 23                    |
| Ibstock Brick, Harrington Lane                           | 30                    |
| Land south of the Pinn Brook                             | 34                    |
| Land north and south of Tithebarn Lane                   | 35                    |
| Sandrock Nursery, Pinn Lane                              | 37                    |
| Land at Monkerton  | 39                    |
| Land north and south of Harts Lane                       | 40                    |
| Land at Hill Barton Farm                                 | 44                    |
| Land east of Hill Barton Road                            | 45                    |
| Land north of Honiton Road                               | 47                    |
| HMS Pellew, Dryden Road                                  | 48                    |
| St Loyes College, Topsham Road                           | 50                    |
| Land north of West of England School, Topsham Road       | 53                    |
| Car Park north of Digby Drive                            | 55                    |
| Bishops Court Sand Quarry, Sidmouth Road                 | 56                    |
| Land at Beech Cottage, Old Rydon Lane                    | 59                    |
| Land east of the railway, Old Rydon Lane                 | 60                    |
| Land south of Old Rydon Lane                             | 61                    |
| Exeter Golf and Country Club Practice Ground             | 62                    |
| Land north of Topsham Road                               | 63                    |
| Land east and west of the M5, Topsham/Exeter Road (part) | 66                    |
| Former RNSD, Topsham Road                                | 1000                  |
| SEF Site and Lower RNSD, Topsham Road                    | 1015                  |
| ORLN Site, Old Rydon Lane                                | 1017                  |

7.8 As per the situation under market recession conditions, of the sites that are allocated for employment use in the Exeter Local Plan or have unimplemented planning permission for employment use at 31 March 2009, only one (Site 58 in Appendices C and Dii) is considered to be unavailable for housing during this period (see 6.28-6.29 above).

7.9 Table 6 below summarises the housing potential of identified sites from 1 April 2009 to 31 March 2026 (i.e. the full plan period), assuming that normal economic conditions will exist in Years 1-5.

<sup>19</sup> See Appendices C, D(ii) and E(ii) for further details.

| <b>Table 6: Summary of number of dwellings predicted to come forward on identified sites from 1 April 2009 to 31 March 2026, under normal market conditions</b> |                          |                           |                            |                            |              |
|---|--------------------------|---------------------------|----------------------------|----------------------------|--------------|
| Source  | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total        |
| Sites with planning permission for housing at 31.03.09.   | 2,080                    | 454                       | 0                          | 0                          | 2,534        |
| Remaining housing allocations in the Dev't Plan (mid point yield)   | 1,653                    | 2,465                     | 708                        | 59                         | 4,885        |
| Exeter Urban Capacity Study 2006 (mid-point yield)  | 181                      | 116                       | 0                          | 0                          | 297          |
| Reg.of Surplus Public Sector Land (mid-point yield)   | 17                       | 0                         | 0                          | 0                          | 17           |
| Call for sites (mid-point yield)  | 176                      | 635                       | 370                        | 0                          | 1,181        |
| <b>TOTAL</b>  | <b>4,107</b>             | <b>3,670</b>              | <b>1,078</b>               | <b>59</b>                  | <b>8,914</b> |

7.10 As summarised in Table 3 above, from 1 April 2009, the residual RSS requirement of 13,183 dwellings results in a ten year requirement for 7,755 dwellings and a fifteen year requirement for 11,632 dwellings.

7.11 The 2<sup>nd</sup> and 3<sup>rd</sup> columns of Table 6 above indicate an assessed potential housing supply during the ten year period of 7,777 dwellings. This equates to a **surplus of 22 dwellings** compared to the ten year requirement and represents a **housing land supply of 10 years**. It amounts to **100% of the ten year requirement**.

7.12 Columns 2-4 of Table 6 indicate an assessed potential housing supply during the fifteen year period of 8,855 dwellings. This amounts to a **shortfall of 2,777 dwellings** compared to the fifteen year requirement and represents a **housing land supply of 11 years and 5 months**. It equates to **76% of the fifteen year requirement**.

7.13 Finally, Table 6 shows an assessed potential housing supply over the residual plan period from 2009 to 2026 of 8,914 dwellings. This amounts to a **shortfall of 4,269 dwellings** at the end of the plan period and represents a **housing land supply of 11 years and 6 months**. It equates to **68% of the residual plan period requirement**.

*Summary of assessed housing land supply, assuming normal market conditions*

7.14 In conclusion, assuming that market conditions remain normal throughout the Plan period, section 7.0 of the SHLAA indicates that Exeter:

- has a five year supply of deliverable land for housing;
- has sufficient deliverable and developable sites to meet the RSS housing requirement for 10 years; but
- does not have sufficient deliverable and developable sites to meet the RSS requirement for 15 years or for the 17 year residual plan period to 2026.

## **8.0 REVIEWING THE ASSESSMENT**

- 8.1 The Practice Guidance advises that if insufficient deliverable and developable sites have been identified to meet land supply requirements, then the SHLAA should be reviewed. For example, it may be necessary to identify additional sites, or to review assumptions made about the housing potential of sites that have already been assessed.
- 8.2 As set out in section 6.0 above, if the current economic recession is taken into account in Years 1-5 then the SHLAA is unable to identify a deliverable five year land supply, or sufficient deliverable and developable sites to meet the RSS requirements for the next ten years, fifteen years or for the remaining seventeen residual plan period to 2026.
- 8.3 Under the constraints of a recession, the only way to try and address the five and ten year shortfalls is for additional sites to be identified and assessed as deliverable and/or developable. However, although future SHLAA updates may result in the identification of more sites (e.g. when the economy begins to recover, additional landowners may feel that it is worthwhile responding to a 'call for sites'), for the purposes of this SHLAA the Council considers it has done all that it reasonably can to identify as many sites as possible.
- 8.4 If normal market conditions are assumed throughout the plan period, then the SHLAA demonstrates that there is a deliverable five year supply of land for housing and sufficient deliverable/developable sites to meet the RSS requirements for the next ten years (although not to meet the fifteen year and residual plan period requirements – see Section 9.0 below). The Council considers these findings to be of greater significance than those relating to the economic recession. The findings indicate that, if the RSS five and ten year strategic housing requirements are not met, it will not be because the planning system has failed to identify sufficient deliverable and developable sites for housing, but because of short term economic circumstances which are beyond the planning system's control. It is not appropriate to identify sites that are inherently unsuitable for residential development in planning terms, or unavailable, or unachievable, in order to address potential housing shortfalls caused by these circumstances.
- 8.5 As such, it is concluded that the SHLAA has identified a five year supply of deliverable land for housing and sufficient deliverable and developable sites for the next ten years of the plan period. However, whether or not the economic recession is taken into account in Years 1-5, the SHLAA has failed to identify sufficient deliverable and developable sites to meet the RSS fifteen year and residual seventeen year plan period requirements.

## **9.0 ASSESSING BROAD LOCATIONS FOR GROWTH AND WINDFALLS**

- 9.1 As there are still insufficient sites to meet the RSS fifteen year and residual plan period housing requirements following the review, it is necessary to investigate how the shortfalls can be best planned for. The Practice Guidance sets out two options for this: firstly, the identification of broad locations for future housing growth and/or secondly, where this can be justified, the use of a windfall allowance (i.e. an allowance for previously developed sites coming forward that have not already been identified in the SHLAA).

## Broad locations for growth

- 9.2 Broad locations are defined in the Practice Guidance as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. The Practice Guidance indicates that broad locations should only be taken into account after Year 10 of the plan period (i.e. 2019 onwards in the case of this SHLAA). To estimate the housing potential of broad locations, regard should be paid to the nature and scale of potential opportunities within the area, the RSS and market conditions. As it is difficult to predict the state of the housing market in 2019 and beyond, the SHLAA assumes that potential completion rates in the broad locations will be as per the standards set out in paragraph 5.23 of the Methodology.
- 9.3 To identify broad locations for growth in Exeter, the Council has paid specific regard to RSS strategic housing policy (see paragraph 5.10 above). This promotes residential development within the existing urban area, together with urban extensions on the eastern and south-western sides of the City.
- (i) *Broad locations within the existing urban area ('Regeneration Areas')*
- 9.4 There are two broad locations for growth within the existing urban area, these being the 'Water Lane Area' and the 'Grecian Quarter'.
- 9.5 The Water Lane Area is previously developed and largely in employment use (industry). It is located to the west of the River Exe/Canal and north-east of the mainline railway to Plymouth. It is identified as a broad location for growth for three reasons. Firstly, it forms part of a larger area (the 'Quay / Canal Basin Area', the remainder of which has recently been redeveloped or has planning permission) allocated for comprehensive mixed-use redevelopment in the Exeter Local Plan First Review. Secondly, provision of a significant number of new dwellings in the Water Lane Area forms part of the 'Exeter and East Devon New Growth Point Delivery Plan' (2007). Thirdly, the Exeter Employment Land Review 2009 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 business to remain and no evidence of a need to retain employment opportunities in the area. As a location for housing it is highly sustainable and its redevelopment could provide significant regeneration benefits to the City as a whole.
- 9.6 One 'specific' site in the Water Lane Area has been identified in the SHLAA as potentially developable for housing during the plan period<sup>20</sup>. An assessment of the area's additional housing potential is set out in Appendix I. The assessment concludes that the Water Lane Area has the potential to deliver a further 584 dwellings (mid-point) between 2019 and 2026, in addition to the specific site already accounted for in the SHLAA.
- 9.7 The Grecian Quarter comprises an area of brownfield land in the centre of Exeter, bound by Sidwell Street to the west, Western Way to the east and Paris Street to the south. It currently incorporates a variety of land uses, including the City's Bus and Coach Station, employment, retail, leisure, car parking and a small amount of housing.

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<sup>20</sup> Site 17 in Appendices C and D(i) and (ii).

- 9.8 The Grecian Quarter is identified as a broad location for growth on two grounds. Firstly, its southern third is allocated in the Exeter Local Plan First Review for comprehensive mixed-use redevelopment that has not yet been realised, but towards which progress is being made. Secondly, as with the Water Lane Area, it offers a highly sustainable location for housing (amongst other uses) and its regeneration would be beneficial to the entire City.
- 9.9 Three 'specific' sites within the Grecian Quarter are identified in the SHLAA as potentially deliverable for housing during the plan period<sup>21</sup>. An assessment of the area's additional housing potential is set out in Appendix I. It concludes that the Grecian Quarter has the potential to yield a further 211 dwellings (mid-point) between 2019 and 2026, in addition to the specific sites already accounted for in the SHLAA.

*(ii) Urban Extensions*

- 9.10 The emerging Core Strategy refines the location of the urban extensions identified in the RSS to three areas of land – 'Monkerton/Hill Barton' and 'Newcourt' on the eastern side of the City and 'Alphington' on the south-western side. The housing potential of the Monkerton/Hill Barton and Alphington areas has already largely been taken into account in Sections 6.0 and 7.0 above<sup>22</sup>. However, as a significant part of the Newcourt area has not yet been assessed in the SHLAA, it is considered to be a third broad location for growth.
- 9.11 Newcourt is bound to the north by the A379, to the west by Rydon Lane, to the south by Topsham Road and to the east by the M5. It currently incorporates a range of land-uses, including recreational, residential, employment and a significant amount of greenfield land.
- 9.12 The SHLAA has identified several specific sites in the Newcourt area as potentially deliverable, developable or undevelopable for housing before 2026<sup>23</sup>. The assessment of Newcourt's additional housing potential as a broad location for growth (see Appendix I) concludes that it could deliver a further 875 dwellings in total.

*Conclusions*

- 9.13 Table 7 below summarises the total potential housing land supply over the plan period, assuming conditions of economic recession during Years 1-5, once the estimated additional housing potential of the three broad locations for growth are taken into account. Table 8 provides the same figures, but assuming normal market conditions throughout the plan period.

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<sup>21</sup> Site 15 in Appendices C and D(i) and (ii) and Sites 1010 and 1154 in Appendix E(i) and (ii).

<sup>22</sup> See sites 18-20 (Alphington) and 34-47 (Monkerton/Hill Barton) in Appendices C and D(i) and (ii).

<sup>23</sup> Sites 58-63 in Appendices C, D(i) and (ii) and Sites 1000 and 1015-1017 in Appendix E(i) and (ii).

| <b>Table 7: Summary of total potential housing land supply in Exeter from 1 April 2009 to 31 March 2026 based on specific sites and broad locations for growth, taking market conditions into account</b> |                          |                           |                            |                            |               |
|---|--------------------------|---------------------------|----------------------------|----------------------------|---------------|
|   | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total         |
| Deliverable & Developable sites   | 2,797                    | 4,557                     | 1,387                      | 59                         | 8,800         |
| Broad locations for growth  | -                        | -                         | 1,194                      | 476                        | 1,670         |
| <b>Total</b>  | <b>2,797</b>             | <b>4,557</b>              | <b>2,581</b>               | <b>535</b>                 | <b>10,470</b> |

| <b>Table 8: Summary of total potential housing land supply in Exeter from 1 April 2009 to 31 March 2026 based on specific sites and broad locations for growth, under normal market conditions</b> |                          |                           |                            |                            |               |
|--|--------------------------|---------------------------|----------------------------|----------------------------|---------------|
|  | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total         |
| Deliverable & Developable sites  | 4,107                    | 3,670                     | 1,078                      | 59                         | 8,914         |
| Broad locations for growth   | -                        | -                         | 1,194                      | 476                        | 1,670         |
| <b>Total</b>   | <b>4,107</b>             | <b>3,670</b>              | <b>2,272</b>               | <b>535</b>                 | <b>10,584</b> |

9.14 As the contribution from broad locations for growth can only be taken into account from Year 11 onwards, this element of the SHLAA does not affect the five or ten year housing supply figures. However, Tables 7 and 8 indicate that the broad locations for growth could potentially yield an additional 1,194 dwellings between Years 11 and 15, and a further 476 dwellings in Years 16 and 17.

9.15 If market conditions are taken into account in Years 1-5 (Table 7), the shortfall in provision reduces to 1,697 dwellings against the fifteen year strategic housing requirement and to 2,713 dwellings by 2026. If normal market conditions are assumed throughout the plan period (Table 8), the shortfall in provision reduces to 1,583 dwellings compared to the fifteen year strategic housing requirement and to 2,599 by 2026. In conclusion, whether or not the economic recession is taken into account in Years 1-5, the three broad locations for growth will not yield sufficient dwellings to make up the fifteen year and residual seventeen year plan period housing requirements.

### **Windfalls**

9.16 PPS3 is clear that assessments of land supply for housing should be based upon specific sites and, where necessary, broad locations. An allowance for the contribution of windfall sites should only be made if there are genuine local circumstances to warrant this. Where such circumstances exist, the allowance should only be made from Year 11 onwards.

9.17 As discussed in paragraph 9.15 above, the RSS strategic housing requirements for the next fifteen years and over the residual plan period will not be met through the development of specific deliverable and developable sites and the three broad locations for growth. The Council therefore

considers it necessary and justifiable to make an allowance for windfall sites on the following grounds:

- The SHLAA has identified as many specific sites as possible for assessment from the list of sources in Table 1 of the Methodology;
- The assessment of specific sites is considered to be well-founded and robust. Sites have only been discounted if they are unsuitable for housing development (i.e. development would be contrary to development plan policy), because they are not known to be available, or because they are considered to be unachievable.
- The assessment of the additional potential capacity of broad locations is also believed to be well-founded and robust.

9.18 The Practice Guidance indicates that to determine an appropriate windfall rate, an estimate should be made of the amount of housing that could come forward on previously developed land that has not already been identified in the SHLAA (i.e. as a specific deliverable, developable or undevelopable site, or as part of the broad locations for growth). The estimate can be based on past trends, but should consider whether the trend is likely to increase or decrease – for example, as a result of different patterns of land availability or because of market conditions.

9.19 Table 9 below summarises the number of dwellings that were completed on windfall sites in Exeter (outside the broad locations for growth) between 1 April 2001 and 31 March 2009.<sup>24</sup> The figures show that completion rates varied each year, sometimes considerably, with no overall decreasing or increasing trend. The average annual completion rate over the period was of 290 dwellings per year.

|                  | 2001/<br>02 | 2002/<br>03 | 2003/<br>04 | 2004/<br>05 | 2005/<br>06 | 2006/<br>07 | 2007/<br>08 | 2008/<br>09 | Average |
|------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|---------|
| No. of dwellings | 268         | 253         | 230         | 322         | 407         | 339         | 193         | 311         | 290     |

9.20 At this early stage in the plan process, it is difficult to predict with certainty whether or not this annual average windfall rate will still prevail in the period from 2019 (Year 11 onwards). Overall, the Council is reasonably confident that the rate will not decrease due to a shortage of previously developed land/buildings. This is because the 2006 Urban Capacity Study indicates that there is still significant potential in Exeter for housing to come forward through conversions/living over the shop and infill (sources which have generally not already been identified in the SHLAA). Furthermore, given that Table 9 covers a period of ‘average’ economic conditions incorporating both growth and recession, and assuming that the period from 2019 onwards will be similarly characterised, it is reasonable to assume that the rate will not change significantly due to market conditions. These assumptions will be kept under review when preparing future SHLAAs. However, on balance, the Council’s best prediction is that windfalls may continue to come forward at a similar annual average rate from 2019 onwards.

<sup>24</sup> Figures are taken from successive ‘Housing: Planning Permissions & Completions’ documents published annually by the Council, excluding completions on sites allocated for housing in the Exeter Local Plan 1<sup>st</sup> Alteration (1993), Exeter Local Plan 2<sup>nd</sup> Alteration (1997) and the Exeter Local Plan First Review (2005).

## Conclusions

- 9.21 Table 10 below summarises the total potential housing land supply over the plan period, assuming conditions of economic recession during Years 1-5, once the estimated contribution from windfalls is taken into account. Table 11 provides the same figures, but assuming normal market conditions throughout the plan period.
- 9.22 290 dwellings per year over a seven year period equates to a windfall contribution of 2030 dwellings. For simplicity however, this is rounded to 2000 and distributed equally between the seven years from 2019 onwards..

**Table 10: Summary of total potential housing land supply in Exeter from 1 April 2009 to 31 March 2026 based on specific sites, broad locations for growth and windfalls, taking market conditions into account**

|                                 | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total         |
|---------------------------------|--------------------------|---------------------------|----------------------------|----------------------------|---------------|
| Deliverable & Developable sites | 2,797                    | 4,557                     | 1,387                      | 59                         | 8,800         |
| Broad locations for growth      | -                        | -                         | 1,194                      | 476                        | 1,670         |
| Windfall allowance              | -                        | -                         | 1,430                      | 570                        | 2,000         |
| <b>Total</b>                    | <b>2,797</b>             | <b>4,557</b>              | <b>4,011</b>               | <b>1,105</b>               | <b>12,470</b> |

**Table 11: Summary of total potential housing land supply in Exeter from 1 April 2009 to 31 March 2026 based on specific sites, broad locations for growth and windfalls, under normal market conditions**

|                                 | Years 1-5<br>(2009-2014) | Years 6-10<br>(2014-2019) | Years 11-15<br>(2019-2024) | Years 16-17<br>(2024-2026) | Total         |
|---------------------------------|--------------------------|---------------------------|----------------------------|----------------------------|---------------|
| Deliverable & Developable sites | 4,107                    | 3,670                     | 1,078                      | 59                         | 8,914         |
| Broad locations for growth      | -                        | -                         | 1,194                      | 476                        | 1,670         |
| Windfall allowance              | -                        | -                         | 1,430                      | 570                        | 2,000         |
| <b>Total</b>                    | <b>4,107</b>             | <b>3,670</b>              | <b>3,702</b>               | <b>1,105</b>               | <b>12,584</b> |

- 9.23 As the contribution from windfalls can only be taken into account from Year 11 onwards, this element of the SHLAA does not affect the five or ten year housing supply figures. However, Tables 10 and 11 indicate that windfalls could potentially contribute 1,430 dwellings between Years 11 and 15, and a further 570 dwellings in Years 16 and 17.
- 9.24 If market conditions are taken into account in Years 1-5 (i.e. Table 10), the shortfall in provision reduces to 267 dwellings against the fifteen year strategic housing requirement and to 713 dwellings by 2026. If normal market conditions are assumed throughout the plan period (Table 11), the shortfall in

provision reduces to 153 dwellings compared to the fifteen year strategic housing requirement and to 599 by 2026.

- 9.25 In conclusion, whilst the contribution from windfalls (and indeed all sources of housing assessed in the SHLAA so far) will be monitored throughout the plan period, this assessment indicates that they will not make up the fifteen year and residual seventeen year plan period housing requirements, whether or not the economic recession is taken into account in Years 1-5. It is therefore necessary to consider additional potential supplies of housing land supply.

### **Additional potential broad locations for growth**

- 9.26 In addition to the three broad locations assessed in 9.4 to 9.12 above and the contribution from windfalls, the Council is aware of at least three further potential broad locations which could yield a significant amount of housing if needed to meet the RSS fifteen year and residual plan period requirements. These are Pinhoe Quarry, Middlemoor and land to the west of Topsham. Residential development in these broad three locations would accord with strategic planning policy in the RSS.
- 9.27 Pinhoe Quarry is a large previously developed area of land on the north-eastern edge of the City, comprising a brick quarry and adjoining unworked quarry land. It is currently safeguarded as a minerals consultation area in the Devon Minerals Local Plan. However, quarrying is no longer taking place and it is feasible that the site could become available for development during the latter part of the plan period. The potentially developable area of the Quarry measures around 7 hectares. If the standard 80% net developable ratio and 40-50 dph density is applied to this area, it suggests the Quarry could yield between around 224 to 280 dwellings.
- 9.28 Middlemoor lies within the existing urban area towards the east side of Exeter. 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 provisionally indicated that the area could yield around 100 dwellings in the future, alongside non-residential uses.
- 9.29 The land between Topsham and the M5 is largely greenfield, including open fields and public open space, with ribbon development along the roads. It forms part of the strategic gap between Topsham and Exeter that has been protected from development by successive Local Plans. The area is relatively well placed to be served by existing infrastructure and to link into, and take advantage of, infrastructure enhancements as part of adjoining development proposals at Newcourt. Development of the area would also present opportunities to provide affordable housing for local people, support existing facilities and provide new facilities that would benefit Topsham as a whole. However, due to the role that the area fulfils as a strategic gap, development would only be encouraged if monitoring indicates that it is required to meet the RSS requirements.
- 9.30 Taken together and allowing for possible planning constraints, it is reasonable to expect these three broad locations could yield a sufficient number of dwellings to address the 15 year and residual 17 year shortfalls identified in paragraph 9.23 above.

## **10.0 CONCLUSIONS ON POTENTIAL HOUSING LAND SUPPLY**

10.1 If conditions of economic recession are taken into account in Years 1-5 in accordance with the parameters set by the Panel, then based on the RSS requirement for 15,000 dwellings to be provided in Exeter from 2006 to 2026, the 2009 SHLAA concludes that Exeter:

- does not have a five year supply of potentially deliverable sites for housing, but instead a supply of only three years and seven months (i.e. 2,797 dwellings, or 72% of the requirement);
- does not have a ten year supply of potentially deliverable and developable sites for housing, but instead a supply of only nine years and six months (i.e. 7,354 dwellings, or 97% of the requirement);
- has a housing land supply to meet the fifteen year and residual (seventeen year) plan period requirements, comprising potentially deliverable and developable sites, broad locations for growth, windfalls and additional potential broad locations for growth.

10.2 If assumptions relating to normal market conditions are applied in accordance with the advice from the Planning Inspector, then the 2009 SHLAA concludes that Exeter has:

- a five year supply of potentially deliverable sites for housing (in total, a supply of 4,107 dwellings, or five years and four months, or 106% of the requirement);
- a ten year supply of potentially deliverable and developable sites for housing (in total, a supply of 7,777 dwellings, or ten years, or 100% of the requirement);
- a housing land supply to meet the fifteen year and residual (seventeen year) plan period requirements, comprising potentially deliverable and developable sites, broad locations for growth, windfalls and additional broad locations for growth.

10.3 As explained in 8.3 above, the Council considers the findings relating to normal market conditions to be of greatest significance.

10.4 The potential housing supply over the full RSS period, taking into account past completions and conditions of economic recession in Years 1-5, is demonstrated in the trajectory at Appendix J(i). The trajectory at Appendix J(ii) demonstrates the supply taking into account past completions and assuming normal market conditions throughout the plan period. In both cases, it is assumed that the contribution from the 'additional broad locations for growth' will be sufficient to achieve the RSS housing requirement for Exeter of 15,000 dwellings. The trajectories will form the basis of the Council's housing trajectory in future Annual Monitoring Reports.

## **11.0 REVIEW OF THE SHLAA**

11.1 The SHLAA will be subject to annual review, in order to:

- up-date the Council's housing trajectory in its Annual Monitoring Report;

- up-date the Council's assessment of its 5 year supply of specific deliverable sites for housing, and inform the Council's response to National Indicator 159 'supply of ready to develop housing sites';
- monitor which of the potential specific developable sites have come forward through the planning process, either through the granting of planning permissions or through the allocation process, and through development;
- identify where there has been progress in addressing the constraints identified to the development of specific sites;
- identify any new constraints to the development of specific sites which may result in them no longer being deliverable or developable and how these can be resolved where possible;
- allow any additional specific sites to be brought forward by landowners for assessment;
- identify and take account of relevant national, regional and local planning policy changes; and
- identify and reflect changes in market factors or development viability that could impact upon the deliverability of sites.