



INTERIM ACTION PLAN
5 YEAR HOUSING LAND SUPPLY

INTRODUCTION

- 1.1 Planning Policy Statement 3 (PPS 3) published in 2006 and amended in 2010 requires local planning authorities to monitor and manage the release of housing land to ensure that there is a five year supply of deliverable housing sites when measured against the annualised targets set out in the relevant regional and local planning policies.
- 1.2 Paragraph 60 of PPS3 states that if a 5 year deliverable supply is not likely to be available consideration should be given to the arrangements necessary to maintain an adequate supply of deliverable sites.
- 1.3 The relevant planning policy against which to judge the five year supply is the emerging Exeter City Council Core Strategy submitted to the Secretary of State in February 2011. The annualised requirement for housing when set against the Core Strategy provision for an additional 12,000 houses up to 2026 amounts (after deduction for completions) to around 600 houses per year.
- 1.4 It was clear prior to the Examination into the soundness of the Core Strategy held in June 2011 that it was not possible to identify a five year supply of deliverable sites when set against the Core Strategy requirement. The Inspector appointed to examine the Core Strategy asked that the City Council prepare an Interim Action Plan to try and address this shortfall and this document adopted by the Executive of the City Council is in response to this request and seeks to bring about positive action to remedy a shortfall of deliverable sites.

HOUSING LAND SUPPLY IN EXETER

- 2.1 Calculations done at the time of the submission of the Core Strategy showed that the City Council could only show 2 years 8 months supply of housing land when judged against the Core Strategy requirement. A further calculation carried out at the same time showed that a five year supply was unlikely to be available until the period 2013/2014.
- 2.2 Following the conclusion of the examination hearings and the publication of the decision notice of a planning appeal into residential development at Hill Barton to the east of the City (ref APP 2137880) a further calculation of housing land supply was carried out on a July 1st base date which showed a land supply figure of 4 years 7 months. Such a figure still leaves a deficit of some 250 dwellings to be provided to give a 5 year supply and since accepted wisdom and the now draft National Planning Policy Framework (NPPF) requires a supply in excess of 5 years to allow flexibility (in the case of the NPPF an additional 20% is suggested) the need is for substantially more than an additional 250 houses to come forward to have a satisfactory housing land supply.
- 2.3 The absence of a 5 year supply of housing land when set against Core Strategy requirements is not an uncommon problem particularly when deliverability of housing land is affected by an economic downturn and restricted availability of mortgage finance. Local Authorities who also rely on substantial urban extensions for their housing supply often find such large scale releases of housing land take some time to come forward due to the complexities involved in such extensive areas of development.

2.4 Other local authorities have sought to overcome interim shortages in housing land supply by making additional interim allocations of housing land to provide for new development to come forward in the 5 year period. Exeter City Council is keen to promote additional housing development within its boundaries and recognises the important part the sustainable growth of the City has to play in the prosperity of the sub region and indeed of the south west peninsula. It is a fundamental tenet of the Core Strategy however that the City Council have allocated all the suitable land within the City for future residential development. The land remaining undeveloped within the City boundaries the Council considers is constrained by landscape and wider environmental constraints and is not suitable for residential development in the short to medium term. The Council have committed to reappraise such undeveloped land in the light of any changed priorities should the Core Strategy fail to bring forward sufficient growth within the plan period. The Council do not consider that any such additional land is suitable for short term release for housing development and therefore the emphasis of the Interim Action Plan is to seek to bring forward sites already identified as having some suitability for housing development.

POLICIES

- 3.1 The suitability of sites to accommodate housing development is assessed principally through the Strategic Housing Land Availability Assessment (SHLAA) the latest version of which was published in December 2010. It is this document which forms the starting point for the City Council policy of trying to bring housing development forward and a list of the initial sites central to the policies contained in this Action Plan is shown on the attached schedule and accompanying map.
- 3.2 The Council will carry out an urgent review of the 2010 SHLAA to seek to identify any land not included within this document which may have potential to provide housing development within the next 5 years.
- 3.3 One category of land that is not included within the SHLAA is land known as windfall sites. This definition would include land such as back gardens or redundant industrial or commercial land. The very unpredictable nature of this source of land precludes its inclusion in the 5 year supply calculation. For the purposes of the Interim Action Plan however the Council will seek to identify any substantial areas of windfall land with a view to promoting its development for residential development where appropriate. Windfall land plays an important contribution to the overall supply of housing within Exeter an appraisal of the last ten years of housing completions in the City show that on average 220 dwellings per year were completed on windfall sites.

POLICY 1: The Council will carry out an urgent review of the 2010 SHLAA to seek to identify any land not included in this document which may have potential to produce housing completions within the next 5 years including where appropriate any potential windfall sites.

- 3.4 The City Council has long been supportive of housing growth within the City and remains keen to encourage sustainable housing development. As part of a long term strategy and in line with the needs of this Interim Action Plan the Council intend to adopt a more proactive role towards the delivery and enabling of sustainable development including housing development and will seek to engage and form partnerships with developers and landowners. The Council will also seek to build upon the present stakeholder groups that exist such as the Builders Forum, the Agents Forum and the SHLAA Technical Panel to promote greater understanding about housing land supply.

POLICY 2: The Council will seek to engage with land owners and developers of the sites listed within the accompanying schedule (appendix a) with a view to promoting where appropriate housing development on this land to deliver completions within the next five years.

3.5 Included within attached schedule are those sites which form part of the three major strategic allocations for additional housing set out in the Core Strategy. Such allocations are subject to substantial infrastructure requirements and the Hill Barton Inspector was critical of the uncertainty with regard to the timing and costs involved in the provision of this infrastructure.

POLICY 3: The Council will prepare a schedule of the costs, timing and viability of the infrastructure requirements associated with the development of land within the strategic allocations and will monitor and update such information. With a view to bringing sites within these allocations forward for development as quickly as possible. Previous time related, as opposed to infrastructure related, phasing requirements associated with these developments will be deleted.

POLICY 4: The Council will consider the establishment of a permanent Infrastructure Officer to ensure prompt infrastructure delivery and the coordination of such delivery with the introduction of the proposed Community Infrastructure Levy.

3.6 The local authorities remain significant land owners within the City and where possible local authority owned land will be brought forward as quickly as possible for housing development where such a use is appropriate.

POLICY 5: The Council will seek to bring forward where appropriate its own land for housing development and will engage with the County Council to pursue a similar approach to County owned land.

3.7 The granting of planning consent for development can be a time consuming process. The City Council over recent years has introduced a number of changes to this process to try and facilitate and speed up the granting of consent. With the need to promote the release of land for housing development the Council however intend to make the grant of appropriate consent an explicit priority and bring in administrative procedures to achieve this.

POLICY 6: The Council will “fast track” planning applications for major housing development (10+units) and will introduce administrative changes and procedures to ensure such applications are dealt with promptly including:

- **Any planning application for such development will be given a priority in terms of registration and validation and will be progressed within a working day of receipt**
- **All pre application requests concerning major housing development will be guaranteed a meeting within 10 working days.**
- **All such applicants will be offered the opportunity to make a formal presentation to the Planning Member Working Group to enable any potential issues to be identified at an early stage.**
- **All such applications will be put before the first available planning committee following conclusion of the statutory consultation period.**
- **Where appropriate a section 106 template will be made available to applicants at the earliest possible stage and the planning solicitor will be present at pre application meetings.**
- **Applicants will be provided with an agreed timetable to discharge conditions following the grant of consent.**

3.8 The delivery of additional housing through the policies of the Core Strategy will be closely monitored and it is also likely that the Core Strategy will itself be subject to a formal review, The Council will need to reappraise areas of land presently deemed unsuitable for housing development to assess their suitability for such development in the longer term and in the light of any changed priorities. The Council will seek to cooperate and work in partnership with adjoining local authorities to address any shortfall in the provision of additional housing within the sub region and to assess the opportunities for growth beyond 2026. As part of this future partnership approach the Council will continue to contribute fully to the work of the Growth Point Board and the Local Enterprise Partnership.

POLICY 7: The Council will carry out within the next 5 years a detailed appraisal of all significant areas of land within the City boundary presently deemed unsuitable for development to assess the longer term potential of such land to provide additional housing development. The Council will seek to cooperate with adjoining authorities with a view to establishing a partnership approach to deal with issues of growth within the sub region.

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