



**REVISED  
STRATEGIC HOUSING LAND  
AVAILABILITY ASSESSMENT  
(SHLAA)  
2015**

**MAIN REPORT**

## EXECUTIVE SUMMARY

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

The *Revised 2015 SHLAA* presents an analysis of the potential for housing development of sites in Exeter (including sites with and without planning permission). It also includes a trajectory of potential housing supply over the remaining *Core Strategy* plan period (1 April 2015 to 31 March 2026). The *Revised 2015 SHLAA* represents an update of the *2015 SHLAA*, which was published in April 2015.

The SHLAA does not make binding judgements on whether sites should be allocated for housing or whether planning permission is likely to be granted. The SHLAA helps to identify the most developable and deliverable sites for housing development. Any housing allocations will be made in the emerging *Development Delivery Development Plan Document (DPD)*.

The *Revised 2015 SHLAA* concludes that Exeter has a 5 year supply of deliverable sites, in accordance with national guidance. It also concludes that there is sufficient deliverable and developable land in the City to meet the *Core Strategy's* target to deliver at least 12,000 new homes between 2006 and 2026.

## CONTENTS

	<b>Page</b>
<b>1 Introduction</b>	4
What is a SHLAA?	4
Approach and methodology	4
<b>2 Purpose and content of the assessment</b>	6
Purpose and minimum requirements of a SHLAA	6
Monitoring and review	6
Status of SHLAA report and identified sites	6
<b>3 Involvement of stakeholders in the SHLAA</b>	7
SHLAA methodology for the Exeter Housing Market Area	7
The SHLAA Panel	7
<b>4 The planning background</b>	8
National planning policy	8
Local planning policy	8
2015 SHMA	8
Student housing	9
Housing for older people	9
<b>5 Scope of the Assessment</b>	10
Stage 1: Planning the assessment	10
Stage 2: Determining which sources of sites should be included in the assessment	10
Stage 3: Desktop review of existing information	10
Stage 4: Site size threshold	10
Stage 5: Assessing whether and when sites are likely to be developed	10
Stage 6: Estimating the housing potential of each site	13
Stage 7: Overcoming constraints	13
Stage 8: Determining the housing potential of windfalls in the first 5 years	13
Stage 9: Determining the housing potential of broad locations in Years 6-10	13
Stage 10: Review of the assessment	13
<b>6 Analysis of potential housing completions</b>	16
Sites with planning permission at 31 March 2015 that are under construction	16
Sites with planning permission/permission resolution to approve at 31 March 2015, where development has not started	16
SHLAA sites	17
Windfall sites	20
Broad locations	23
<b>7 Results of the Revised 2015 SHLAA</b>	25
The 5 year housing supply: April 2015 to March 2020	25
Housing delivery over the plan period: 2006 to 2026	26
<b>8 Consultation on the SHLAA findings</b>	27

<b>APPENDIX 1</b>	<b>Revised 2015 SHLAA Panel Membership</b>	<b>28</b>
<b>APPENDIX 2</b>	<b>Housing for students</b>	<b>29</b>
<b>APPENDIX 3</b>	<b>SHLAA Methodology for predicting commencement and build rate</b>	<b>30</b>
<b>APPENDIX 4</b>	<b>Assessment of sites with planning permission and broad locations</b>	<b>32</b>
<b>APPENDIX 5</b>	<b>Schedules and housing trajectory</b>	<b>33</b>

# 1 INTRODUCTION

## What is a SHLAA?

- 1.1 Strategic Housing Land Availability Assessments (SHLAAs) were introduced in national planning guidance in 2007 and are key components in the process of housing delivery. A SHLAA is a strategic assessment of the housing potential of specific sites. SHLAAs are undertaken in partnership with key stakeholders in the housing field and require regular monitoring and updating.
- 1.2 The *National Planning Policy Framework (NPPF)*<sup>1</sup> advises (paragraphs 47 and 48) that local planning authorities (LPAs), drawing on evidence from SHLAAs and other relevant evidence, should:
- identify annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land, or 20% where there has been a persistent record of under delivery of housing; and
  - identify a supply of specific developable sites or broad locations for years 6-10 and, where possible, years 11-15; and
  - make an allowance for windfall sites in the 5 year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a realistic source of supply.
- 1.3 *National Planning Policy Guidance (NPPG)*<sup>2</sup> includes a section on *Housing and Economic Land Availability Assessment*, which adds detail to the advice on housing delivery contained in the *NPPF*. The *NPPG* indicates which inputs and processes will lead to a robust assessment of housing land availability and states that, where they depart from the guidance, plan makers must set out their reasons for doing so.
- 1.4 The 2009 and 2010 SHLAAs form part of the evidence base of the *Exeter Core Strategy*, which sets out the vision, objectives and strategy for the spatial growth of the City to 2026. The *Revised 2015 SHLAA* will inform the *Development Delivery DPD*, which is currently being prepared.

## Approach and methodology

- 1.5 The *South West Regional Housing Strategy 2005-2016*<sup>3</sup> sets out indicative boundaries for 14 sub-regional housing market areas (HMAs) in the region. The HMAs have been translated into the nearest equivalent district authority boundaries for practical purposes. Joint working across the whole of an HMA to assess levels and types of housing is seen as essential. Strategic Housing Market Assessments (SHMAs) provide evidence of the level and type of need in a sub-regional housing market area.
- 1.6 Exeter is in the Exeter HMA, which also includes East Devon, Mid Devon, part of Dartmoor National Park and Teignbridge local planning areas. A new *SHMA* report for the Exeter HMA was published in March 2015<sup>4</sup>.
- 1.7 The LPA partners (partner authorities) in the Exeter HMA have formed a steering group who have together developed a *SHLAA Methodology*<sup>5</sup> and drawn up a constitution and

---

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

<sup>2</sup> Department of Communities and Local Government (DCLG) (March 2014) *National Planning Policy Guidance*

<sup>3</sup> South West Regional Assembly (2005) *South West Regional Housing Strategy 2005-2016*

<sup>4</sup> David Couttie Associates (2015) *Exeter Strategic Housing Market Assessment*

terms of reference for a SHLAA Panel. The *Methodology* is firmly based on the advice set out in the *NPPF* and *NPPG*.

- 1.8 The *Methodology* was subject to public consultation and then originally published in September 2008. It has since been revised. The latest version of the *Methodology* is available on Exeter City Council's website at [www.exeter.gov.uk/SHLAA](http://www.exeter.gov.uk/SHLAA).
- 1.9 Also available to view via the above link are the 2009, 2010 and 2013, Revised 2013 and 2015<sup>6</sup> editions of the *SHLAA*.
- 1.10 This document comprises the 6<sup>th</sup> edition of Exeter's *SHLAA*. It has been prepared in accordance with the *NPPF*, *NPPG* and the *Methodology* and in consultation with the *SHLAA* Panel of Stakeholders. Further details of the review are included in this report. The base date for the *SHLAA* – i.e. the date from which potential housing delivery in Exeter is assessed - is 1 April 2015.

---

<sup>5</sup> Local Authorities of the Exeter HMA (Revised February 2015) *Exeter HMA SHLAA Methodology*.

<sup>6</sup> Exeter City Council (August 2009) *Exeter 2009 Strategic Housing Land Availability Assessment*; Exeter City Council (December 2010) *Exeter 2010 Strategic Housing Land Availability Assessment*; Exeter City Council (February 2013) *Exeter 2013 Strategic Housing Land Availability Assessment*; Exeter City Council (February 2014) *Exeter Revised 2013 Strategic Housing Land Availability Assessment*; Exeter City Council (April 2015) *Exeter 2015 Strategic Housing Land Availability Assessment*.

## **2 THE PURPOSE AND CONTENT OF THE ASSESSMENT**

### **Purpose and minimum requirements of a SHLAA**

- 2.1 The SHLAA serves two primary purposes:
- It assesses the five year supply of deliverable housing sites; and
  - It assesses whether or not the housing requirement for the plan period can be met.
- 2.2 The SHLAA includes an assessment of sites to determine whether they are deliverable within the next five years. As such, the SHLAA provides the evidence for demonstrating Exeter's five year deliverable housing land supply.
- 2.3 The SHLAA's assessment of whether or not the housing requirement for the plan period can be met can take into account the contribution of (i) deliverable sites, (ii) developable sites, (iii) broad locations and (iv) windfall sites.

### **Monitoring and review**

- 2.4 The *NPPG* advises that the five year housing supply calculation in SHLAA should be carried out annually, based on up-to-date and sound evidence. It also states that it should not be necessary to update the assessment for a full 12 months, unless significant new evidence comes to light or the local authority wishes to update the assessment earlier. The City Council monitors housing supply on a continual basis and therefore may update the five year supply calculation (and SHLAA) on more than one occasion during the course of a year.

### **Status of the SHLAA and identified sites**

- 2.5 The following points are made to clarify the status of sites identified within the SHLAA, in order to help to avoid confusion and misunderstanding:
- The SHLAA does not pre-empt future plan making or related decisions;
  - The SHLAA is not part of the Development Plan. It is a piece of technical evidence that may help to inform the Development Plan;
  - The SHLAA does not rank sites in order of preference;
  - Sites assessed as deliverable/developable may be tested further through the plan making process, when judgements will be made about whether the sites should be allocated for development. This will include rigorous testing through sustainability appraisal/strategic environmental assessment, habitats regulation assessment; stages of public participation and independent examination;
  - The positive assessment of a site in the SHLAA does not guarantee that planning permission will be granted for new housing. However, the SHLAA may be a material consideration in the determination of planning proposals;
  - The SHLAA does not preclude sites being developed for other suitable uses;
  - The SHLAA does not preclude other sites that have not been identified from being developed for housing.

### **3 INVOLVEMENT OF STAKEHOLDERS IN THE SHLAA**

#### **SHLAA Methodology for the Exeter Housing Market Area**

- 3.1 As explained in paragraphs 1.7 and 1.8 above, a joint *Methodology* is used by the partner authorities in the Exeter HMA.

#### **The SHLAA Panel**

- 3.2 The partner authorities have established a shared Panel of housing stakeholders, who act on a voluntary basis. Although membership of the Panel has changed over time, there has been a good degree of continuity. This has led to increasing confidence and consistency in applying the *Methodology* to individual SHLAAs. Panel members have also provided detailed advice on the current condition of the housing market and contributed generally to the work of the local authorities in the Exeter HMA. The role and responsibilities of the Panel are explained in further detail in the *Methodology*.
- 3.3 In order to establish a representative local Panel, invitations for membership were sent to a wide range of large, medium sized and small house building companies, architects, estate agents and planning consultants. The Panel also includes a range of statutory agencies such as the Environment Agency, Highways Authority, Highways Agency (England) and Natural England. The local community is represented, in the case of Exeter City Council, by the Exeter Civic Society. The Panel that conducted the assessment of sites in Exeter for the *Revised 2015 SHLAA* is set out in Appendix 1. Panel members are required to make declarations of interest where any personal, financial or prejudicial interests apply.



## 4 THE PLANNING BACKGROUND

### National planning policy

- 4.1 The national planning policy documents that have informed the *Revised 2015 SHLAA* are summarised in paragraphs 1.2 and 1.3 above.
- 4.2 The *Revised 2015 SHLAA* is the first edition to take the *NPPG* into account. As a University City that also has a sizeable elderly population, paragraphs 37 and 38 of the *NPPG* are of particular significance for Exeter. Paragraph 37 clarifies that 'Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.' Paragraph 38 states that 'All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market'.

### Local planning policy

- 4.3 The main policy document covering spatial development in Exeter is the *Core Strategy*<sup>7</sup> (adopted February 2012). In addition, most policies in the *Exeter Local Plan First Review 1995-2011*<sup>8</sup> (the *Local Plan*) have been saved for development management purposes. These policies will eventually be superseded by those contained in the *Development Delivery DPD*.
- 4.4 Policy CP3 of the *Core Strategy* seeks to provide for at least 12,000 new dwellings in Exeter between 2006 and 2026, on land within the urban area (effectively the area not protected by landscape designations under Policy CP16) and three urban extensions. This equates to an annual average requirement of at least 600 dwellings. Policy CP3 also refers to three Regeneration Areas, which lie within the urban area.

### 2015 SHMA

- 4.5 In March 2015, a new *SHMA* was published setting out the objectively assessed housing needs for each local authority in the Exeter HMA. The starting point for the *SHMA* is to look at past population trends and project these forward into the future. Population growth is then translated into housing requirements using both the 2008 and 2011 household formation rates. The *SHMA* also takes into account the fact that the Exeter area has a growing economy, with a projected increase in jobs and workforce. There is a need to ensure that there are sufficient homes to provide for the future working population.
- 4.6 The *SHMA* establishes an objectively assessed housing need range (using the demographic base) of 549 to 629 dwellings per year for Exeter over the period 2013 to 2033. This averages at 589 dwellings per year and amounts to a total of 11,780 dwellings over the 20 year period.
- 4.7 For Exeter, the *SHMA* also identifies what element of the objectively assessed housing need relates to the student population. It indicates that approximately 168 dwellings per year (of the 589 average dwellings per year) are needed to meet student housing needs.
- 4.8 As set out in paragraph 4.4 above, Exeter City Council already has an adopted *Core Strategy* that identifies Exeter's strategic housing requirement. A recent letter from the Minister of State for Housing and Planning to all local planning authorities makes it clear that the emergence of a new *SHMA* 'does not immediately or in itself invalidate housing numbers in existing local plans'.

---

<sup>7</sup> Exeter City Council (February 2012) *Exeter Core Strategy 2006-2026*

<sup>8</sup> Exeter City Council (2005) *Exeter Local Plan First Review 1995-2011*

- 4.9 The *SHMA* does, however, provide important new evidence in relation to student accommodation needs. It is clear from the *SHMA* that higher education students living in student houses and purpose-built student accommodation (PBSA) are responsible for a significant proportion of Exeter's housing requirements (approximately 29%).
- 4.10 Whilst this new evidence relates specifically to Exeter's future housing requirement, it is reasonable to assume that Exeter's past housing requirement included a similar element of student housing need. The population projections upon which the *SHMA* and *Core Strategy* are based take into account students living in student houses and PBSA. It is also known that student numbers at the University of Exeter have grown significantly since 2006 (and indeed over the past 30 years).

#### **Student housing**

- 4.11 Based on the findings of the *SHMA* (see paragraphs 4.6 and 4.7 above), the *Revised 2015 SHLAA* assumes that 29% of the (at least) 12,000 dwelling target set by the *Core Strategy* should comprise PBSA. This amounts to a cap of 3,480 units of PBSA over the plan period. Once the cap is reached, no additional PBSA will be counted in the supply calculation.
- 4.12 Appendix 2 sets out how the *SHLAA* counts PBSA in the supply figures, both in terms of completions since 2006 and projections of future housing delivery to 2026. This method for counting students was agreed by the *SHLAA* Panel at a meeting in May 2014.

#### **Housing for older people**

- 4.13 On the basis of paragraph 37 of the *NPPG*'s clear statement that local authorities should count housing provided for older people, including residential institutions in Use Class C2, the *Revised 2015 SHLAA* includes both institutional (i.e. Use Class C2) and non-institutional (e.g. extra care and sheltered housing) housing for older people in the supply calculation. Appendix 4 of the *Methodology* sets out how different types of housing for older people are counted.

## 5 THE SCOPE OF THE ASSESSMENT

### Stage 1: Planning the assessment

- 5.1 Preparation of the *Revised 2015 SHLAA* has followed on from work on earlier editions, together with other work in the Exeter HMA undertaken by Teignbridge, Mid Devon and East Devon District Councils and the Dartmoor National Park Authority. The work, including all site visits, technical assessments and the production of information material, was undertaken in-house. There has been a commendable practice of Panel members undertaking their own site visits.

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

- 5.2 The *NPPG* provides information on the sources of sites with potential for housing. The sources comprise sites already in the planning process and those that are currently outside. They include:
- Sites with planning permission for housing that are unimplemented or under construction (extant permissions);
  - Existing housing allocations and site development briefs;
  - Land in the local authority's ownership;
  - Vacant and derelict land and buildings;
  - Surplus public sector land; and
  - Additional opportunities in established uses (e.g. underused garage blocks).

### Stage 3: Desktop review of existing information

- 5.3 In preparing the *Revised 2015 SHLAA*, the Council has updated its schedule of residential planning permissions, removing any permission that have lapsed and adding in any new permissions/resolutions to approve.
- 5.4 In terms of sites without planning permission (or a resolution to approve):
- the assessments of 119 sites considered in earlier editions of the SHLAA have been updated where necessary (e.g. some now have planning permission);
  - a further 21 new sites have been identified for assessment from the Council's database of pre-application inquiries made since publication of the *Revised 2013 SHLAA* (the last edition).

### Stage 4: Site size threshold

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

### Stage 5: Assessing whether and when sites are likely to be developed

- 5.6 As set out in paragraphs 2.1 to 2.3 above, the purpose of a SHLAA is twofold: to identify deliverable sites for the first 5 years of a plan that are ready for development; and to identify whether or not the development plan housing target can be achieved taking into account specific deliverable and developable sites, broad locations and windfall sites.
- 5.7 The *NPPF* (paragraph 47) defines a **deliverable** site as one that is:
- **available** – the site is available now;
  - **suitable** – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities; and

- **achievable** – there is a reasonable prospect that housing will be delivered on the site within five years of the SHLAA's base date (i.e. 1 April 2015, for the purposes of the *Revised 2015 SHLAA*).

- 5.8 Paragraph 31 of the *NPPG* goes on to state that deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full, that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years. However, it also advises that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five year supply. LPAs will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints to overcome such as infrastructure, sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5 year timeframe.
- 5.9 The *NPPF* defines a **developable** site as one that is in a suitable location for housing development, with a reasonable prospect of being available and viably developed at a specific time. The SHLAA assigns sites that meet these criteria to the 6-10 or 11-15 year period.
- 5.10 The *NPPF* defines a **windfall** site as one which has not been specifically identified as available in the local plan process. The *NPPF* and *NPPG* do not define **broad locations**. The DCLG's *SHLAA Practice Guidance (2008)*, which has been superseded by the *NPPG*, defines broad locations as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified.

#### **Stage 5a: Assessing suitability for housing**

- 5.11 The *NPPG* (paragraph 019) advises that the suitability of a site or broad location for housing should be assessed against the development plan, emerging plan policy and national policy, taking into account market and industry requirements in the housing market area. It goes on to say that sites allocated in existing development plans and those with planning permission will generally be suitable, subject to any changes in circumstances. For other sites, it lists the following range of factors to be considered in assessing a site's suitability:
- physical problems or limitations;
  - potential impacts on landscape, built and natural heritage;
  - appropriateness and likely market attractiveness;
  - contribution to regeneration priority areas; and
  - environmental/amenity impacts.
- 5.12 The *Methodology* expands those factors, applying a two stage approach to assessing the suitability of a site. Stage A consists of assessing sites against a range of strategic considerations, as set out in Table 1 below. If a site fails at Stage A, it is deemed to be in an unsuitable location for housing development and does not proceed to the more detailed Stage B Assessment.

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

- 5.13 Those sites that pass the Stage A Suitability Assessment are then examined in detail through a Stage B Suitability Assessment. The Stage B Assessment involves undertaking a variety of technical investigations and surveys for each site. A great deal of information on heritage characteristics, biodiversity, land use, flood risk etc is accessible on Exeter City Council's geographic information system (GIS). Site characteristics recorded include site size, site boundaries, current uses, surrounding land uses and characteristics of the surrounding area, physical constraints (e.g. slope, access, flood risk, natural, archaeological and historic features) and development progress (where applicable). If a site fails at Stage B, it is deemed to be an unsuitable location for housing development and is not subject to tests for availability and achievability.

#### **Stage 5b: Assessing availability for housing**

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

#### **Stage 5c: Assessing achievability for housing**

- 5.15 'Achievability' is defined as whether there is a reasonable prospect that housing will be developed within specified time periods. This will be affected by market conditions, the costs associated with the development and the phasing of development schemes. The professional expertise and experience of Panel members adds considerably to the thoroughness and rigour of the achievability assessments.
- 5.16 To help the Panel form its views on achievability, for each site, information has been provided on any physical and community infrastructure requirements and other factors needing to be taken into account.
- 5.17 The *NPPG* (paragraph 24) indicates that any broad locations identified as suitable for housing development in the SHLAA should only be considered achievable from Year 6 of the base date.

## **Stage 6: Estimating the housing potential of the site**

- 5.18 To estimate the housing potential of sites, the *Methodology* sets out various standard 'gross to net developable areas' (subject to site size), which take into account the proportion of the total site area needed to provide roads, pavements and other services and facilities. It then advises that standard densities should be applied to the net developable area, in order to calculate an overall potential housing yield for the site.
- 5.19 The *Methodology* allows the partner authorities to depart from the application of these standards where it can be justified. In order to more accurately reflect the circumstances of individual sites, the majority of yields attributed to sites without planning permission in the *Revised 2015 SHLAA* are based on the advice of experienced planning officers at the City Council and/or the SHLAA Panel. The *Methodology's* standards have only been applied where planning officers and/or the SHLAA Panel have agreed that they result in realistic yields.
- 5.20 For the purposes of the SHLAA housing trajectory, annual delivery (or completion) rates must be applied to sites where development would take place over a number of years. The *Methodology* again sets out a standard approach to determining the rate within the Exeter HMA area. In accordance with the recommendations of the Panel, the standard approach requires predicted completion rates to be halved during Years 1-5 in order to reflect recently depressed housing market conditions (see Appendix 2 for more details).
- 5.21 Notwithstanding the approach set out in the *Methodology*, the City Council has attempted to contact the landowners of all sites with planning permission/resolution to approve and without planning permission (SHLAA sites), in order to obtain an update on their planned start dates and completion rates. This approach adds significant weight to the predicted housing projections contained in the *Revised 2015 SHLAA*.

## **Stage 7: Overcoming constraints**

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

## **Stage 8: Determining the housing potential of windfalls in the first 5 years**

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

## **Stage 9: Determining the housing potential of broad locations in years 6-10**

- 5.24 Paragraph 24 of the *NPPG* states that local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the *NPPF*).

## **Stage 10: Review of the assessment**

- 5.25 The *NPPG* states that once sites and broad locations have been assessed, the development potential of all sites can be collated to produce an indicative trajectory. This should set out how much housing can be provided and at what point in the future. If insufficient sites/broad locations are identified against the amount required by the plan, then it will be necessary to revisit the assessment, for example changing the

assumptions on the development potential of particular sites. If, following this review, there are still insufficient sites, then it will be necessary to consider how the shortfall should best be planned for. If there is clear evidence that housing needs cannot be met locally, then it will be necessary to consider how they might be met in adjoining areas in accordance with the duty to cooperate.

## 6 ANALYSIS OF POTENTIAL HOUSING COMPLETIONS

6.1 The sites that have been considered as part of the Revised 2015 SHLAA comprise:

- sites with planning permission at 31 March 2015<sup>9</sup> that are under construction;
- sites with planning permission / resolution to approve at 31 March 2015, where development has not started; and
- 'SHLAA sites', comprising 119 sites carried over from previous SHLAAs and 21 new sites<sup>10</sup>.

6.2 In addition, the *Revised 2015 SHLAA* makes an allowance for development within broad locations and on windfall sites.

### **Sites with planning permission at 31 March 2015 that are under construction**

6.3 In all but 3 cases of sites falling into this category (and in all cases of sites comprising 5 or more dwellings), information on completion rates has been obtained directly from the applicant / agent. Where it has not been possible to obtain information, the standard SHLAA delivery rate set out in Appendix 3 has been applied. The conclusions of this exercise are set out in detail in Schedule 1 of Appendix 5 and summarised in Table 2 below.

<b>Site 2: Predicted yield from sites with planning permission under construction</b>	
<b>Year</b>	<b>Predicted number of completions</b>
2015/16	599
2016/17	534
2017/18	308
2018/19	93
2019/20	52
2020/21	52
2021/22	52
2022/23	24
2023/24	-
2024/25	-
2025/26	-
<b>Total</b>	<b>1,714</b>

### **Sites with planning permission / resolution to approve at 31 March 2015, where development has not started**

6.4 For the vast majority of sites falling within this category, information on the implementation and completion of development has been obtained directly from the applicant / agent. As stated in paragraph 5.8 above, the *NPPG* advises that sites with planning permission can be regarded as deliverable unless there is clear evidence to the contrary. As such, the SHLAA assumes that sites with planning permission / resolution to approve will be developed during the plan period unless advised otherwise by the relevant applicant / agent, or the City Council are aware of constraints that are likely to prevent development. Where the applicant / agent has advised of the timing of implementation and / or completion, the SHLAA reflects this. Where this advice has not been provided, the SHLAA assumes that implementation will occur in accordance with the standard SHLAA delivery rate set out in Appendix 3. The conclusions of this exercise are set out in detail in Schedule 1 of Appendix 5 and summarised in Table 3 below.

<sup>9</sup> Date of last planning committee before the SHLAA was published.



**Table 3: Predicted yield from sites with planning permission / resolution to approve, not started**

Year	Predicted number of completions
2015/16	106
2016/17	405
2017/18	342
2018/19	263
2019/20	228
2020/21	502
2021/22	493
2022/23	386
2023/24	300
2024/25	300
2025/26	300
<b>Total</b>	<b>3,625</b>

**SHLAA Sites (sites without planning permission)**

- 6.5 Of the 140 sites submitted for assessment by landowners and/or their agents since the SHLAA process commenced in 2008/09, 41 sites have since either been developed or have planning for residential use.
- 6.6 In terms of the remaining 99 SHLAA sites, it is important to bear in mind the overarching principles governing the assessment process. In order to be considered a potential contributor to the stock of housing land during the plan period, the SHLAA must conclude that a site submitted for assessment is either **deliverable** (see paragraphs 5.7 and 5.8 above) or **developable** (see paragraph 5.9).
- 6.7 Detailed suitability, availability and achievability assessments of the SHLAA sites are set out in Appendix 4. The following paragraphs provide a summary of the assessments.
- 6.8 33 sites proposed by landowners and/or their agents have been excluded at Stage A of the suitability assessment. This is because of clear conflict with strategic policy set out in Policy CP1 of the *Core Strategy*, and/or due to the unacceptable impact of any development upon biodiversity or geodiversity and/or because the site is at significant risk of flooding. The sites are listed in Table 4 below:

**Table 4: SHLAA sites discounted at Suitability Test Stage A**

Site ref.	Address	Reason for exclusion
1	Land south of Exwick Barton Cottages, St Andrews Road	Strategic policy
6	Land at Stoke Road	Strategic policy
10	Land off Tedburn Road	Strategic policy
11	Land off Hambeer Lane	Strategic policy
13	Oaklands Riding School & The Rosary, Balls Farm Road	Strategic policy
21	Land at Stoke Hill	Strategic policy
31	Oakfields, Church Hill	Strategic policy
32	Estuary View, Church Hill	Strategic policy
52	Ludwell Gardens, Ludwell Lane	Strategic policy
53	Land north of the West of England School, Topsham Road	Strategic policy
67	Yeomans Gardens, Newcourt Road	Strategic policy
68	Land north of Newcourt Road, Topsham	Strategic policy

69	Land north of Exeter Road, Topsham	Strategic policy
70	Mays Field, Topsham	Strategic policy
71	Attwells Farm, Exwick Lane	Strategic policy
74	Land west of Salmonpool Bridge	Strategic policy & flood risk
75	Land east of Salmonpool Bridge	Strategy policy & flood risk
78	Land adjacent 2 Hill Cottages, Church Hill	Strategic policy
85	Five Acres, Exeter Road, Topsham	Strategic policy
86	Land south of Rushmore Nursery, Newcourt Road, Topsham	Strategic policy
87	Land opp. Riversmeet House, Riversmeet, Topsham	Strategic policy & flood risk
90	Land adjoining Exwick Lane	Strategic policy
91	Barley Wood, Barley Lane	Strategic policy
92	Land west of Barley Lane	Strategic policy
93	Land south of Perridge Close	Strategic policy
99	Land north of Beacon Heath	Strategic policy
106	Exeter University Playing Fields, Exeter Road, Topsham	Strategic policy
107	Land adjoining 46 Newcourt Road, Topsham	Strategic policy
117	Land north of Grange House, Pocombe Bridge	Strategic policy, biodiversity/geodiversity & flood risk grounds
121	Land off Wreford's Lane	Strategic policy
122	Land off Lower Argyll Road	Strategic policy
134	Land adjacent Gulpit Cottages, Glasshouse Lane	Strategic policy
135	Land at Highfield Farm, Topsham	Strategic policy

- 6.9 A further 16 SHLAA sites have been excluded following Stage B of the suitability assessment. These sites are listed in Table 5 below, alongside a brief explanation for their exclusion.

<b>Table 5: SHLAA sites discounted at Suitability Test Stage B</b>		
<b>Site ref.</b>	<b>Address</b>	<b>Reason excluded</b>
2	Land off St Andrews Road	Loss of green infrastructure
18a	Land to west of Shillingford Road	Loss of green infrastructure
33	Land adjacent 3 Pinn Lane	Inadequate highways access
38	Land south of Gipsy Hill Lane	Loss of green infrastructure, inadequate highways access and not compatible with surrounding development
39	Land at Monkerton (residual area)	Inadequate highways access and loss of traffic bund.
55	Car park north of Digby Drive	Loss of Park and Ride facility.
57	Land south of Russell Way	Loss of biodiversity (part), inadequate highways access & not

		compatible without surrounding development
64	Playing field south of Wear Barton Road	Loss of green infrastructure
66a	Land west of the M5, Topsham Road	Noise levels
76	Marypole Head, Pennsylvania Road	Inadequate highways access
82	Clyst View, Hollow Lane	Loss of green infrastructure
88	Land adjoining 6 Exe View Cottages	Inadequate highways access
97	Land at Ringswell Campus, Bramley Lane	Loss of green infrastructure
104	Land west of Newcourt House, Old Rydon Lane	Impact on built environment and not compatible with surrounding development.
130	Land adjacent Wonford House, Dryden Road	Impact on biodiversity (part), built environment and contrary to Policy CS1 of the Local Plan
133	Land adjacent Lakeside Avenue	Loss of green infrastructure

- 6.10 The remaining SHLAA sites have been subjected to a test of availability. Following confirmation that they are no longer available for development, sites 12, 16, 26, 28, 34, 48, 113 and 125 have failed this test.
- 6.11 The SHLAA Panel has considered the achievability of the sites that have passed the tests of suitability and availability. In summary, the Panel has advised that the sites set out in Table 6 below are unachievable because development would be economically unviable.

**Table 6: SHLAA sites discounted as unachievable**

25	35-39 Summer Lane
73	17-19 Water Lane
79	23 Causey Lane
80	Bayonne, Pinhoe Road

- 6.12 Table 7 sets out the predicted yield by year of the 38 SHLAA sites assessed as suitable, available and achievable, to the end of the plan period. The figures are set out in detail in Schedule 2 of Appendix 4.

**Table 7: Predicted yield from SHLAA sites**

Year	Predicted number of completions
2015/16	-
2016/17	-
2017/18	54
2018/19	97
2019/20	109
2020/21	683
2021/22	528

2022/23	304
2023/24	32
2024/25	-
2025/26	75
<b>Total</b>	<b>1,882</b>

### Windfall sites

- 6.13 Paragraph 48 of the *NPPF* allows LPAs to include windfall sites in the 5 year housing land supply calculation if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a realistic source of supply. The allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends and should not include residential gardens. Paragraph 24 of the *NPPG* states that a windfall allowance can be included in years 6-10, based on geographical area, again provided that there is compelling evidence to do so.
- 6.14 Drawing on the *NPPF*'s definition, the City Council defines a windfall site as one that, at the time planning permission is applied for, is not already identified as available for development in the local plan process<sup>11</sup>.
- 6.15 The *NPPF* stipulates that future windfall projections should be based on the following:
- Evidence of the consistent availability of windfall sites in the past, taking into account historic delivery rates; and
  - Evidence that windfalls will continue to provide a reliable source of sites, taking into account the SHLAA and any future trends.

#### Evidence of the consistent availability of windfall sites in the past, taking into account historic delivery rates

- 6.16 Schedule 4 of Appendix 5 to this report sets out all completions in Exeter over the 10 year period between 2005/6 and 2014/15. This timeframe covers periods of pre-recession, recession and post-recession, thereby reflecting every potential state of the housing market. Appendix 5 subdivides annual completions as follows:
- Completions on residential garden land. These are identified separately in view of the *NPPF*'s statement that a windfall allowance should not include land from this source;
  - Completions on sites identified as available for development in the local plan process, at the time planning permission was applied for;
  - Completions on windfall sites comprising schemes of 5 or more dwellings (net). A threshold of 5 or more dwellings (net) has been used because it is the same as the threshold for SHLAA sites; and
  - Completions on windfall sites comprising schemes of between 1 and 4 dwellings (net).
- 6.17 Appendix 5 identifies (by means of an asterisk) those completions comprising purpose-built student accommodation (PBSA).
- 6.18 Table 8 summarises the windfall site statistics contained in Appendix 4.

<sup>11</sup> I.e. At the time planning permission was sought, the site was not allocated for residential development in the *Exeter Local Plan First Review 1995-2011* or the emerging *Development Delivery DPD*; it did not lie within the Strategic Allocations or Regeneration Areas identified in the *Exeter Core Strategy 2006-2026*; and it was not assessed as an available 'site without planning permission' (SHLAA site) in the most recently published edition of the *SHLAA*.

<b>Table 8: Past completions on windfall sites</b>							
Year	Total	Completions on windfall sites comprising schemes of 5+ dwellings (net)			Completions on windfall sites comprising schemes of 1-4 dwellings (net)		
		Non-student	PBSA	Total	Non-student	PBSA	Total
05/06	282	226	0	226	56	0	56
06/07	267	220	0	220	47	0	47
07/08	224	161	8	169	55	0	55
08/09	225	156	14	170	55	0	55
09/10	133	80	35	115	18	0	18
10/11	617	159	425	584	33	0	33
11/12	647	275	338	613	28	6	34
12/13	418	27	367	394	22	2	24
13/14	110	33	39	72	38	0	38
14/15	379	79	270	349	30	0	30
<b>Total</b>	<b>3,302</b>	<b>1,416</b>	<b>1,496</b>	<b>2,912</b>	<b>382</b>	<b>8</b>	<b>390</b>
<b>Annual average</b>	<b>330</b>	<b>142</b>	<b>150</b>	<b>291</b>	<b>38</b>	<b>1</b>	<b>39</b>

- 6.19 Column 2 of Table 8 shows the number of dwellings completed on windfall sites over the past 10 years. The annual total has never fallen below 110 dwellings. Overall, column 2 demonstrates that windfall sites have been consistently available throughout the period, with an average of 330 dwellings completed annually.
- 6.20 Columns 3 to 5 of Table 8 show (in terms of non-student housing, PBSA and in total) the number of completions on windfall sites comprising schemes of 5 or more dwellings over the past 10 years. Column 5 demonstrates that completions have consistently come forward throughout the period, only dropping below 100 dwellings in one year (72 in 2013/14) and averaging at 291 dwellings per annum. The recent economic recession appears to have had little impact upon total completions from this source. Non-student completions remained high until 2012/13 and now appear to be picking up, whilst the PBSA market has strengthened despite the recession.
- 6.21 Columns 6 to 8 of Table 8 show (in terms of non-student housing, PBSA and in total) the number of completions on windfall sites comprising schemes of between 1 and 4 dwellings over the past 10 years. There have been very few PBSA windfall completions on sites of this size, reflecting the fact that student housing schemes tend to be much larger. Column 8 indicates that annual completions on windfall sites comprising schemes of 1-4 dwellings have decreased slightly over the period, at an average rate of around 2.9 dwellings per year. It is unclear whether or not this trend is due to the economic recession, a decline in the availability of sites, other factors, or a combination of all three. Notwithstanding this trend, Table 9 demonstrates that completions from this source have continued to come forward throughout the period, averaging at 39 dwellings per annum.

Evidence that windfalls will continue to provide a reliable source of sites, taking into account the SHLAA and any future trends

- 6.22 As windfall sites cannot be identified in advance, it is not possible to provide concrete evidence that they will continue to provide a reliable source of sites over the remaining plan period. However, it is reasonable to consider whether or not the past trends set out above will continue.

- 6.23 In terms of completions on windfall sites comprising schemes of 5 or more dwellings, there is no evidence to suggest that past trends will not continue into the foreseeable future. The trend in Column 3 of Table 9 is not downwards. In her report on the recent Home Farm appeal<sup>12</sup>, the Inspector opined that windfall rates would have fallen in Exeter since the first SHLAA was produced in 2008/09, because the SHLAA process would have resulted in more sites being 'previously identified'. However, this opinion is not borne out by evidence. Since the first SHLAA was produced in 2008/09, the number of completions on windfall site schemes of 5 or more dwellings has averaged 328 dwellings per annum. This is considerably higher than the averages for both the 10 year period (291) and the 3 year period from 2005/06 to 2007/08 (205). An explanation for this lies, at least in part, in the reluctance of landowners / developers to submit their sites for assessment in a process that could be regarded as constraining their options. This is borne out by the number of large sites within the urban area that have been developed since 2008/09 but have not been submitted for assessment in the SHLAA, or have been withdrawn from the SHLAA process (see paragraph 6.10). There is no evidence in Exeter that the SHLAA process has resulted in a decline in windfall rates.
- 6.24 In light of these points, it could be assumed that completions on windfall sites comprising schemes of 5 or more dwellings would continue at the past average rate of 142 per year for non-student housing and 150 per year for PBSA. However, to avoid accusations that this is overly generous, the *Revised 2015 SHLAA* takes a more conservative approach based on removing from the calculation the years where the highest total number of windfalls were completed (2010/11 (584) and 2011/12 (613)). Taking this approach, a future annual windfall completion rate of 123 non-student dwellings is assumed. Likewise, in terms of PBSA, a future annual windfall completion rate of 91 units is assumed. This drops to 60 units in 2022/23 and 0 thereafter, due to the 'cap' placed on counting PBSA in the housing supply (see paragraphs 4.11 and 7.10). These past trends will be monitored and the assumed rates adjusted accordingly in any future SHLAA.
- 6.25 In the absence of any evidence to the contrary, the *2015 SHLAA* assumes that the downward trend in completions on windfall sites comprising non-student schemes of 1-4 dwellings will continue at 2.9 per year. Starting from a base of 30 completions in 2014/15 (see Table 9), it is therefore conservatively assumed that completions from this source will amount to 27 (27.1) dwellings in 2015/16, dropping to 0 in 2025/26. No allowance is made for PBSA windfall completions on sites of this size, because few homes have been delivered from this source over the past 10 years. Again, these trends will be monitored and the assumed rate adjusted accordingly in any future SHLAA.
- 6.26 Table 9 summarises the total number of windfall completions expected to be delivered in Exeter over the remaining plan period, based upon the assumptions set out above.

---

<sup>12</sup> The Planning Inspectorate, (29 October 2014). Appeal Decision – Appeal Ref. APP/Y1110/A/14/2215771.

<b>Table 9: Calculation of windfall completions over the remaining plan period</b>				
<b>Year</b>	<b>Predicted completions on windfalls sites</b>			<b>Total predicted windfall completions (A+B+C)</b>
	<b>(A) 5+ dwellings (non-student)</b>	<b>(B) 5+ dwellings (PBSA)</b>	<b>(C) 1-4 dwellings (non-student)</b>	
15/16	123	91	27	241
16/17	123	91	24	238
17/18	123	91	21	235
18/19	123	91	18	232
19/20	123	91	16	230
20/21	123	91	13	227
21/22	123	91	10	224
22/23	123	60	7	190
23/24	123	0	4	127
24/25	123	0	1	124
25/26	123	0	0	123
<b>Total</b>	<b>1,353</b>	<b>697</b>	<b>141</b>	<b>2,191</b>

- 6.27 Before windfalls can be included in the housing supply calculation, it is first necessary to deduct those windfall completions that have already been predicted through the SHLAA process (i.e. completions on windfall sites that already have planning permission/resolution to approve, as set out in Schedule 1 of Appendix 5). Table 10 summarises this calculation. Column 4 of Table 10 sets out the number of windfall dwellings that are expected to be completed in Exeter, over and above those already identified through the SHLAA process.

<b>Table 10: Calculation of windfall completions over the remaining plan period, in addition to those already predicted through the SHLAA process</b>			
<b>Year</b>	<b>Total predicted windfall completions (A)</b>	<b>Windfall completions already predicted through the SHLAA process (B)</b>	<b>Windfall completions in addition to those already predicted through the SHLAA process (A-B)</b>
2015/16	241	299	0
2016/17	238	209	29
2017/18	235	6	229
2018/19	232	0	232
2019/20	230	0	230
2020/21	227	4	223
2021/22	224	0	224
2022/23	190	0	190
2023/24	127	0	127
2024/25	124	0	124
2025/26	123	0	123
<b>Total</b>	<b>2,191</b>	<b>518</b>	<b>1,731</b>

### Broad locations

- 6.28 Appendix 4 (pages 388 to 393) contains an assessment of the housing potential of three broad locations in the City. They comprise:
- The Water Lane Regeneration Area: an area of previously developed land within the urban area, identified for mixed use redeveloped including housing in Policy CP3 of the *Core Strategy* and in the emerging *Development Delivery DPD*;

- The Grecian Quarter Regeneration Area: an area of previously developed land within the urban area, identified for mixed use redeveloped including housing in Policy CP3 of the *Core Strategy* and in the emerging *Development Delivery DPD*; and
- Newcourt: 1 of 3 strategic allocations for mixed use development made in Policies CP1 and CP3 of the *Core Strategy*<sup>13</sup>.

6.29 The *NPPF* (paragraph 47) allows the contribution of broad locations to be taken into account from year 6 onwards in the development plan period. Table 10 summarises the predicted housing yield of the three broad locations from year 6. The figures are set out in detail in Schedule 3 of Appendix 4.

<b>Table 10: Predicted yield from broad locations</b>	
<b>Year</b>	<b>Predicted number of completions</b>
2020/21	50
2021/22	100
2022/23	100
2023/24	57
2024/25	50
2025/26	75
<b>Total</b>	<b>432</b>

<sup>13</sup> Monkerton/Hill Barton and South West Alphington are the two strategic allocations made in the *Core Strategy*. They are not assessed as broad locations, as they largely comprise sites that have planning permission or SHLAA sites. As such, their residential development potential is already accounted for in the SHLAA.



## 7 RESULTS OF THE Revised 2015 SHLAA

### The 5 Year Housing Supply: 1 April 2015 to 31 March 2020

- 7.1 To help boost the supply of housing, the *NPPF* (paragraph 49) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their requirements, with an additional buffer of 5% to ensure choice and competition in the market for land or 20% where there has been a record of persistent under delivery. Without this, even recently adopted planning policies for the supply of housing will be considered out of date.
- 7.2 Policies CP1 and CP3 of the *Core Strategy* require the delivery of at least 12,000 new dwellings in Exeter between 2006 and 2026. Between 1 April 2006 and 31 March 2015, 5,721 dwellings were completed in Exeter. This leaves a residual requirement to provide at least 6,279 dwellings over the remaining 11 year plan period to 31 March 2026 (12,000 minus 5,721), which equates to an annual average requirement of 570.82 dwellings and a basic 5 year requirement of 2854 dwellings (5 x 570.82).
- 7.3 In accordance with the *NPPF*, it is necessary to add a buffer of 5% or 20% to the basic 5 year requirement. A 20% buffer should only be added if there has been a record of persistent under delivery of housing.
- 7.4 There is not a record of persistent under delivery in Exeter. As stated above, 5,721 dwellings were completed in Exeter between 1 April 2006 and 31 March 2015, compared to an annualised 9-year requirement to deliver 5,400 dwellings. This amounts to an oversupply of 321 dwellings. It is therefore only necessary to add a 5% buffer to the basic 5 year requirement.
- 7.5 Table 11 below summarises the method for calculating the 5 year requirement. Row G identifies the total requirement as **2,997** dwellings.

<b>Table 11: Five year supply requirement for Exeter under Submission Core Strategy</b>		
A	Submission Core Strategy requirement 2006 - 2026 (20 years)	12,000
B	Completions to 31 March 2015	5,721
C	Residual Core Strategy requirement to 2026 (A-B)	6,279
D	Residual annualised requirement (C / 11)	570.81
E	Basic 5 year requirement (D x 5)	2854
F	Allowance of five per cent (E x 5%)	143
<b>G</b>	<b>Total five year requirement (E+F)</b>	<b>2,997</b>
H	Average annual requirement (G / 5)	599

- 7.6 Table 12 sets out the number dwellings that are expected to be delivered over the 5 year period, based on the figures that are summarised in Section 6 of this report and set out in detail in Appendix 5.
- 7.7 It is predicted that 3,908 dwellings will be delivered during the 5 year period. This **exceeds** the requirement to deliver 2,997 dwellings by **911** dwellings. It equates to a housing land supply of just over **6 years and 6 months**.

<b>Table 12: Predicted dwelling yield in Years 1-5</b>						
Source of dwellings	Yield					Total
	15/16	16/17	17/18	18/19	19/20	
Sites with planning permission at 31.03.15 under construction	599	534	308	93	52	1,586
Sites with planning permission / resolution to approve at 31.03.15 not started	106	405	342	263	228	1,344
SHLAA sites	0	0	54	97	109	260
Windfalls	0	29	229	232	230	720
<b>Total</b>	<b>705</b>	<b>968</b>	<b>933</b>	<b>685</b>	<b>619</b>	<b>3,908</b>

#### Housing delivery over the plan period: 2006 to 2026

- 7.8 Table 13 summarises the number of dwellings that have been delivered since the start of the *Core Strategy* plan period, together with those that are predicted to be delivered over the remaining plan period. The figures reflect those already summarised in Section 6 of this report and set out in detail in Schedule 5 of Appendix 4 (the Housing Trajectory).

<b>Table 13: Dwelling delivery over the plan period</b>				
Source of dwellings	Yield			Total
	06/07 to 14/15	15/16 to 19/20 (Yrs 1-5)	20/21 to 25/26 (Yrs 6-11)	
Completions	5,721	-	-	5,721
Sites with planning permission at 31.03.15 under construction	-	1,586	128	1,714
Sites with planning permission / resolution to approve at 31.03.15 not started	-	1,344	2,281	3,625
SHLAA sites	-	260	1,622	1,882
Broad locations	-	-	432	432
Windfalls	-	720	1,011	1,731
<b>Total</b>	<b>5,721</b>	<b>3,910</b>	<b>5,474</b>	<b>15,105</b>

- 7.9 The *Core Strategy* sets a target to deliver at least 12,000 dwellings in Exeter between 2006 and 2026. It is predicted that 15,105 dwellings will be completed over the plan period. This **exceeds** the *Core Strategy*'s target by 3,105 dwellings.
- 7.10 Table 14 summarises the amount of purpose built student accommodation (PBSA) included in the data set out in Table 13, up to the cap of 3,480 units (see paragraph 4.11). The *Revised 2015 SHLAA* assumes that the broad locations will deliver non-student housing.

<b>Table 14: PBSA included in the delivery figures</b>	
Completions	1,891
Sites with planning permission at 31.03.15 under construction	247
Sites with planning permission / resolution to approve at 31.03.15 not started	219
SHLAA sites	426
Broad locations	-
Windfalls	697
<b>Total</b>	<b>3,480</b>

## **8 CONSULTATION ON THE SHLAA FINDINGS**

- 8.1 The SHLAA is not subject to consultation. It is a response to a national policy requirement in the *NPPF* that every local planning authority in England should identify sites with housing potential, assess that potential, and when development is likely to take place. The City Council will take decisions on which sites will be allocated through the development plan process. The development plan process allows for various stages of consultation. It is during this process that the SHLAA and any other evidence that the City Council relies on in support of its proposals will be subject to public scrutiny.
- 8.2 The SHLAA may be subject to scrutiny when development plan documents are independently examined by the Planning Inspectorate and at appeals.

**APPENDIX 1: Revised 2015 SHLAA Panel Membership**

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

## **APPENDIX 2: Housing for students**

Paragraph 38 of the *NPPG* states that “All student accommodation, whether it consists of communal halls of residence or self contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases to the housing market” (para 038).

It has been agreed by the SHLAA Panel that the Exeter HMA partner authorities should include all PBSA completions, planning permissions and SHLAA sites in their housing supply figures, as follows:

<b>TYPE OF ACCOMMODATION</b>	<b>COUNTED AS</b>	<b>JUSTIFICATION</b>
Studio flat (self-contained flat, for occupation by 1 student or a couple)	1 studio flat = 1 dwelling	The DCLG's 'Definitions of General Housing Terms' (14/11/12), which states that “a dwelling’ is a self-contained unit of accommodation, where all rooms (including kitchen, bathroom and toilet) are behind one door which only that household can use” ( <a href="https://www.gov.uk/definitions-of-general-housing-terms">https://www.gov.uk/definitions-of-general-housing-terms</a> ).
Cluster flat (self-contained flat, comprising two or more bedrooms with shared kitchen/dining area)	1 cluster flat = 1 dwelling	
Self-catered communal halls of residence (where students have their own bedroom and use of kitchen facilities within the hall)	6 bedrooms = 1 dwelling	In Exeter, cluster flats either completed since 1 April 2006 or with extant planning permission at 31 March 2014 have, on average, 6 bedrooms. If it is assumed that 1 cluster flat equates to 1 dwelling (see above), it is also reasonable to assume that 6 bedrooms in a self-catered halls of residence equates to 1 dwelling.

### **APPENDIX 3: SHLAA Methodology Model For Predicting Commencement & Build Rate**

#### **Standard model for calculating housing delivery rates**

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

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

### Market conditions model for calculating housing delivery rates

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

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

#### **APPENDIX 4: Assessment Of Sites Without Planning Permission And Broad Locations**

See separate document.



## **APPENDIX 5: Schedules And Housing Trajectory**

See separate document.

