

Exeter Plan

Gypsy and Traveller Accommodation Topic Paper

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Exeter City Council
Civic Centre
Paris Street
Exeter, EX1 1JN



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1. Introduction

- 1.1 This Topic Paper provides further supporting detail to Policy H11: Gypsy and Traveller Accommodation in the Submission Exeter Plan. It explains the national planning policy and evidence context and covers how the City Council proposes to meet identified Gypsy and Traveller accommodation needs.
- 1.2 The Topic Paper sits alongside and can be cross referenced with the Key Issues and Suggested Modifications reports.

2. Planning definition of a Gypsy and Traveller

2.1 The Exeter Plan is being examined against the versions of the National Planning Policy Framework and Planning Policy for Traveller Sites published on 19 December 2023 (this Topic Paper refers to these documents as the 2023 NPPF and 2023 PPTS respectively). This is provided for by the transitional arrangements for plan-making set out in paragraph 234a of the subsequent version of the NPPF, and paragraph 30 of the subsequent version of the PPTS, published on 12 December 2024.

2.2 For planning purposes, the glossary at annex 1 of the 2023 PPTS defines Gypsies and Travellers as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

2.3 Policy H11 of the Exeter Plan applies to the travelling community on the basis of the 2023 PPTS planning definition.

3. Exeter Gypsy and Traveller Accommodation Assessment

- 3.1 The 2024 Gypsy and Traveller Accommodation Assessment¹ (GTAA) is the main source of evidence for Policy H11. It was prepared by consultants on behalf of a group of partner local authorities comprising Exeter City, East Devon, Mid Devon and Teignbridge Councils, supported by Devon County Council. The Exeter-specific GTAA report was completed in September 2024.
- 3.2 The authors of the GTAA are one of the most highly experienced GTAA consultants in the country and have undertaken similar studies for numerous other local authorities. The consultants' robust methodology has supported numerous local plans which have been found sound at examination and is explained in detail in section 3 of the GTAA. In addition to secondary research, the methodology incorporated effective community engagement including interviews with members of the travelling communities and other stakeholders (i.e. local authority officers including from the City Council's City Development and Corporate Estates teams and Devon County Council's Project and Policy Co-Ordinator (Travelling and Vulnerable Communities) and Gypsy, Roma, Traveller and Showman (GRTS) Advisory Teacher).
- 3.3 The baseline for the Exeter GTAA is April 2023, when fieldwork for the assessment was completed.
- 3.4 The primary objective of the GTAA is to provide an assessment of the current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Exeter. The outcomes of the GTAA supersede the findings of previous GTAAs for Exeter / the sub-region.
- 3.5 In regulatory terms the study enables the City Council to comply with its requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act (1985), the Housing and Planning Act (2016), the Equality Act (2010), the 2023 NPPF and the 2023 PPTS.

Permanent pitch needs for Gypsies and Travellers meeting the 2023 PPTS planning definition

- 3.6 The current and future need for permanent pitches in Exeter is comprehensively covered in section 7 of the GTAA. The assessment derives from analysis of information from interviews conducted with households living on authorised Gypsy and Traveller sites in Exeter and authorised and unauthorised sites in East Devon, Mid Devon and Teignbridge Districts (at the time of survey work, there were no known unauthorised sites in Exeter); the consultants' assessment of Gypsy and Traveller household formation rates (set out in appendix G of the GTAA); the MHCLG Caravan Count in January 2024; stakeholder interviews; and planning records. In addition, paragraph 3.18 of the GTAA explains the consultants' robust methodology for identifying the need for permanent pitches arising from Gypsies and Travellers living in bricks and mortar housing.

¹ [Exeter Gypsy and Traveller Accommodation Assessment September 2024](#), Opinion Research Services. 2024.

- 3.7 The analysis concludes that there is no current or future need for permanent pitches in Exeter from households that meet the 2023 PPTS planning definition of Gypsies and Travellers. Full details of the analysis are provided in tables 1 and 2 below, extracted from figures 6 and 7 of the GTAA (it should be noted that the italicised comment in table 1/figure 6 is an error and should have been deleted from the GTAA, but is included in this Topic Paper for completeness).
- 3.8 Whilst the 2021 Census records a significant number of Gypsy, Irish Traveller and Roma households living in bricks and mortar in Exeter, the rigorous approach taken by the consultants to locate these households did not result in interviews taking place. The approach is summarised in paragraph 3.17 to 3.19 of the GTAA and included:
- Interviewing residents of the two permanent Gypsy and Traveller sites in Exeter, to ask if they have any family or friends living in bricks and mortar who might need a pitch. No households were identified from these interviews;
 - Intelligence from stakeholder interviews. Devon County Council's Project and Policy Co-ordinator (Travelling and Vulnerable Communities) and GRTS Advisory Teacher were interviewed in May 2023 and were able to provide details of four households who had consented to be contacted by the consultants. However, despite repeated efforts, the consultants were unable to make contact with and interview these households; and
 - Access to data from the Council's Housing Register. However, the data did not indicate if households were from Gypsy and Traveller communities.
- 3.9 Based on experience, the consultants work on the assumption that any Gypsies and Travellers currently living in bricks and mortar but wishing to move to a permanent pitch will make their views known through the range of methods taken to identify and interview them. As such, the GTAA does not identify the need for any permanent pitches arising from Gypsies and Travellers currently living in bricks and mortar.

Table 1: Need for permanent pitches for Gypsies and Travellers meeting the 2023 PPTS planning definition

Gypsy and Traveller – Meeting Planning Definition	Pitches
Supply of pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5-year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting list for public sites	0

Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No need from 4 households that met the planning definition)</i>	
Total Future Need	0
Net Plot Need = (Current and Future Need – Total Supply)	0

Table 2: Need for permanent pitches for Gypsy and Travellers meeting the 2023 PPTS planning definition by five-year periods

Year Period	Dates	Need
0-5	2023-27	0
6-10	2028/32	0
11-15	2033-37	0
16-19	2037-41	0
0-19	2023-42	0

Need for permanent pitches for undetermined Gypsies and Travellers

- 3.9 Based on the methodology described in paragraph 3.6 above, the GTAA concludes that there is a need in Exeter for up to one permanent pitch for an 'undetermined' Gypsy and Traveller household. This could arise in the period 2033-2037. Undetermined households are defined as those where a survey interview could not be completed, but who need to be assessed as part of the GTAA because they may meet the 2023 PPTS planning definition of a Gypsy and Traveller.
- 3.10 A survey could not be completed with the 'up to one' undetermined Exeter household because the household does not yet exist. As explained in paragraph 7.30 of the GTAA, the finding is based upon:
- The consultants' assumed rate of household formation (1.5%, the justification for which is provided in appendix G of the GTAA), which for Exeter gives a figure of one pitch for undetermined households;
 - An adjustment based on additional nationwide research by the consultants (referred to in paragraph 3.30 of the GTAA), which concludes that only around 30% of households occupying Gypsy and Traveller pitches meet the 2023 PPTS planning definition. This adjustment explains why the need in Exeter for permanent pitches for undetermined households is expressed as 'up to one'.
- 3.11 Full details of the analysis of permanent pitch needs for undetermined households are provided in tables 3 and 4 below, extracted from figures 11 and 12 of the GTAA.

Table 3: Need for permanent pitches for undetermined Gypsy and Traveller households

Gypsy and Traveller – Undetermined	Pitches
Supply of pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0

Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5-year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting list for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	1
<i>(Household based 1 and formation rate 1.5%)</i>	
Total Future Need	Up to 1
Net Plot Need = (Current and Future Need – Total Supply)	Up to 1

Table 4: Need for permanent pitches for undetermined Gypsy and Traveller households by five-year periods

Year Period	Dates	Need
0-5	2023-27	0
6-10	2028/32	0
11-15	2033-37	Up to 1
16-19	2037-41	0
0-19	2023-42	Up to 1

Need for permanent pitches for gypsies and Travellers not meeting the 2023 PPTS planning definition

- 3.12 As explained in paragraphs 3.34 and 7.31 of the GTAA, the 2023 PPTS does not require GTAA to include an assessment of the accommodation needs of households that do not meet its planning definition. Nonetheless, the GTAA includes an assessment of this need. This is because, in accordance with the Equality Act (2010), the Housing and Planning Act (2016) and paragraph 63 of the 2023 NPPF, the needs of these households must be considered as part of the wider housing needs of the local authority area.
- 3.13 The GTAA analysis concludes that there is a combined current and future need for five permanent pitches in Exeter for Gypsy and Traveller households who do not meet the 2023 PPTS planning definition. Full details are provided in tables 5 and 6 below, extracted from figures 15 and 16 of the GTAA.

Table 5: Need for permanent pitches for Gypsy and Traveller households not meeting the 2023 PPTS planning definition

Gypsy and Traveller – Undetermined	Pitches
Supply of pitches	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0

Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5-year need from teenage children	1
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting list for public sites	0
Total Current Need	0
Future Need	
Households on pitches with temporary planning permission	0
New household formation	4
<i>(Household based 1 and formation rate 1.5%)</i>	
Total Future Need	4
Net Plot Need = (Current and Future Need – Total Supply)	5

Table 6: Need for permanent pitches for Gypsies and Traveller households not meeting the 2023 PPTS definition by five-year periods

Year Period	Dates	Need
0-5	2023-27	1
6-10	2028/32	1
11-15	2033-37	1
16-19	2037-41	2
0-19	2023-42	5

Plot needs for Travelling Showpeople

- 3.14 The consultants' methodology identified the need for no current or future plots in Exeter for Travelling Showpeople.

Transit need

- 3.15 To determine the potential need for transit provision, the consultants looked at data from the MHCLG Traveller Caravan Count, the outcomes of stakeholder interviews and records of unauthorised encampments.
- 3.16 Whilst it is a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, the Traveller Caravan Count is a count of caravans, not households. Nonetheless, it can provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 3.17 According to data from the Traveller Caravan Count, there have been no unauthorised caravan encampments recorded in Exeter in recent years. However, it was confirmed in stakeholder interviews that there are at least six unauthorised encampments in Exeter each year. These encampments take place on different areas of land.
- 3.18 At present, data on unauthorised encampments on land owned by the City Council, Devon County Council and the other partner local authorities is

recorded in raw format and therefore does not present a full picture of the extent of transit need in the subregion (for example, households who account for multiple records of encampments cannot be identified from the raw data). At paragraphs 7.45 and 7.47, the GTAA recommends that the partner local authorities undertake additional and more detailed monitoring to help determine the average number of transit caravan spaces needed across the local authorities at any given point in time, to build up a clearer picture of need for transit provision. The partner local authorities are progressing this, with work to date focussed on finalising the common data that should be monitored and a data sharing agreement. The City Council's Corporate Estates Team, which attends unauthorised encampments on Council-owned land, has agreed to use the final monitoring form to gather the necessary data.

4. The Exeter Plan's approach to addressing need

Gypsies and Travellers meeting the 2023 PPTS planning definition and undetermined Gypsies and Travellers

- 4.1 In accordance with paragraph 63 and footnote 28 of the 2023 NPPF and paragraphs 9 to 11 of the 2023 PPTS, only the needs from households that meet the planning definition and from undetermined households who may meet the planning definition in the future should be formally considered in Local Plans. This should be achieved by:
- Setting pitch targets in the Local Plan, working collaboratively with neighbouring local planning authorities;
 - Identifying a five-year supply of specific deliverable sites and a supply of specific developable sites for years six to ten of the Plan;
 - Setting criteria to guide land supply allocations where there is identified need, or, where there is no identified need, including a criteria-based policy to provide a basis for decisions in case applications nevertheless come forward.
- 4.2 Tables 1 to 4 above show that, over the Plan period, there is a need for no permanent pitches in Exeter for households that meet the 2023 PPTS planning definition of a Gypsy and Traveller and up to one permanent pitch for an undetermined household who may meet that definition. Table 4 indicates that this need will not arise until between 2033 and 2037.
- 4.3 It is not realistic for the Exeter Plan to allocate a specific deliverable or developable site to meet the need for up to one permanent pitch that will arise between 2033 and 2037. In terms of public provision, a site allocation of this size would be economically unviable and therefore neither deliverable nor developable. In addition, it may not be required (the need is 'up to 1'). In terms of collaborative work with neighbouring local planning authorities, East Devon District Council has advised through the Duty to Cooperate process that it does not have the capacity to accommodate any of Exeter's Gypsy and Traveller accommodation needs. The new Teignbridge Local Plan reached Regulation 22 stage in March 2024, before the Exeter-specific GTAA was completed; as such, it was not possible for the Teignbridge Local Plan to accommodate any of Exeter's Gypsy and Traveller accommodation needs. Mid Devon District Council adopted its Local Plan in 2020 and, at the time of writing this Topic Paper, has made no significant progress on a new Local Plan. Therefore, at this stage, it is unrealistic to rely on Mid Devon District Council to accommodate any of Exeter's Gypsy and Traveller accommodation needs. The City Council proposes to initiate such discussions at an appropriate time in future.
- 4.4 Given these points, the City Council has taken a pragmatic approach to meet the need for up to one permanent pitch for an undetermined household: Policy H11 includes criteria against which a planning application(s) for windfall development to address this need can be determined, should the need arise. The criteria align with those in paragraph 13 of the 2023 PPTS and more broadly with planning policy in the 2023 NPPF, including in relation to accessibility and affordable housing².

² The City Council's Suggested Modifications paper includes five suggested main modifications to the criteria. None are suggested to ensure alignment with the 2023 PPTS, but for other reasons.

- 4.5 In addition, in accordance with the 2023 PPTS requirement to set pitch targets, section 17 of the Exeter Plan (Monitoring and Implementation) includes a monitoring target for the delivery of six permanent pitches by 2041 (suggested to be modified to 2042 in the City Council's Suggested Modifications paper). The six pitches comprise the identified need for up to one pitch for an undetermined Gypsy and Traveller household plus the need for five pitches for households that do not meet the 2023 PPTS planning definition.

Gypsies and Travellers not meeting the 2023 PPTS planning definition

- 4.6 As explained in paragraph 4.1 of this Topic Paper, the requirements of the 2023 PPTS do not apply to Gypsy and Traveller households that do not meet the 2023 PPTS planning definition. Instead, the implication of the Equality Act (2010), Housing and Planning Act (2016) and 2023 NPPF is that the accommodation needs of these households should be considered as part of the wider housing needs of the local authority area.
- 4.7 Accordingly, the Exeter Plan accounts for the assessed need for five pitches for households that do not meet the 2023 PPTS planning definition as a component of the windfall allowance in Policy H1: Housing Requirement. Policy H11 provides for these pitches to be delivered as windfall development and Policy H11's monitoring target (in section 17 of the Exeter Plan) reflects the assessed need (as explained in paragraph 4.5 above).

Travelling Showpeople

- 4.8 As the GTAA does not identify a current or future need in Exeter for plots for Travelling Showpeople, the Exeter Plan does not set a plot target or identify specific deliverable or developable sites for Travelling Showpeople accommodation. Policy H11 includes criteria against which planning application(s) for windfall Travelling Showpeople plots can be determined.

Transit accommodation

- 4.9 Paragraph 7.39 of the GTAA refers to a current lack of transit provision in Exeter, but there is also a lack of provision across Devon. As recommended in the GTAA, the City Council proposes to use the additional unauthorised encampment monitoring data that will be gathered by the four partner local authorities and Devon County Council to inform a joint protocol to address transit need at a strategic level. This will include consideration of sites for permanent public transit provision and/or management-based approaches such as negotiated stopping agreements. The criteria in Policy H11 will be used to help identify potential sites in Exeter and, alongside other relevant policies in the Exeter Plan, will provide the basis for determining planning applications.

5. Work to identify potential windfall sites

5.1 The City Council is not passively relying on windfall sites coming forwards to meet Policy H11's monitoring target and any transit needs identified through the partner local authorities' ongoing work. The City Council has, and is, actively working to identify suitable, available and achievable windfall sites. Work to date includes:

- Three calls for sites undertaken in late 2020/early 2021, September 2022 and October 2023, as part of the Exeter Housing and Economic Availability Assessment (HELAA) process. These exercises included a question asking landowners if they would be willing to make their land available for Gypsy and Traveller accommodation. Whilst no sites were submitted for assessment as Gypsy and Traveller accommodation, future calls will be undertaken and may result in a different outcome;
- Separately from the HELAA process, a review of potential sites Exeter City or Devon County Council ownership. To date, the review has not resulted in the identification of suitable and achievable sites. However, additional reviews will be undertaken and may result in a site(s) being identified. To date, the following sites have been reviewed and discounted:
 - Land on the northern side of Avocet Road, Exeter (0.21 hectares). Discounted because it is too small to accommodate six permanent pitches, is affected by surface water flood risk and is crossed centrally by overhead powerlines causing land sterilisation;
 - Land north of Tithebarn Way, Exeter (0.69 hectares) (also site reference 164 in the 2025 Exeter HELAA³). Discounted because it is partly within flood zone 3 and appropriate highways access appears to be unachievable;
 - Land south of Hollow Lane, Exeter (0.97 hectares). Discounted due to a restrictive covenant which prevents the parking of any caravan, mobile home, campervan, boat or commercial vehicle on the site;
 - Part of Matford Park and Ride, Matford Park Road, Exeter (unspecified area): Discounted because it is leased to a local bus operator for the next 150 years;
 - Part of Sowton Park and Ride, Honiton Road, Exeter (unspecified area): Discounted because it is required for park and ride use and is affected by surface water flooding and poor noise and air quality;
 - Part of Howell Road Car Park, Howell Road, Exeter (unspecified area): Discounted because it has constrained highways access, is required to accommodate displaced car parking demand from other Council-owned car parks that have closed or are due to close in the near future and is unsuitable for transit provision on grounds of its city centre location;
 - Part of Grace Road Fields, Clapperbrook Lane, Exeter (unspecified area): Discounted because it is entirely within flood zone 3.

³ 2025 Exeter Housing and Economic Land Availability Assessment – Fourth Edition, Exeter City Council. September 2025.

- 5.2 Additional calls for sites and reviews of local authority-owned land will be progressed by the City Council, in addition to work on delivery options. These may include using Section 106 contributions to help fund affordable Gypsy and Traveller pitches with the involvement of a Registered Provider.
- 5.3 Policy H11's monitoring target may be met notwithstanding the City Council's efforts. Policy H11 enables this and planning records demonstrate that planning applications for windfall permanent pitches do occur in Exeter (there have been two such applications in Exeter in the past twenty years and both have been granted planning consent by the City Council – application refs. 05/0587/FUL and 22/0946/LED, at Haven Orchard, Exwick Lane).
- 5.4 As an alternative to windfall provision, it is also realistic to expect that some of the assessed need for permanent pitches will be accommodated through pitch turnover on the existing public permanent site in Exeter. Turnover is not considered as a component of supply in the GTAA and there is currently no waiting list at the site.