

Exeter Local Plan

Examination

Matter 7: Meeting Housing Needs

Date at Examination: 11th March 2026

Devon County Council Position Statement

11th February 2026

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1. Introduction

1.1. Purpose of this Statement

- 1.1.1. This statement has been prepared to answer the questions and address the associated issues as posed by the Planning Inspectors in relation to Matter 7 of the Exeter Local Plan (2022-2042) Examination.
- 1.1.2. This statement relates to Issue 2 questions 1, 6 and 10 and Issue 4 questions 1, 3, 4, and 6 of Matter 7 (Meeting Housing Needs).
- 1.1.3. It should be noted that this statement does not cover all of the questions raised by the Planning Inspectors in relation to Matter 7, but focuses upon those where Devon County Council (DCC) has a specific interest in order to fulfil its statutory responsibilities.

2. Issue 2 Questions

2.1. Issue 2 Question 1

What are the identified needs for housing for older people, build-to-rent housing and co-living housing in Exeter and how will these respective needs be met over the plan period?

- 2.1.1. The need for extra care housing for older people is identified in the Devon County Council Extra Care Housing - Refresh of the Commissioning Strategy for Extra Care Housing (2009) August 2015 (EVB-H-15). This forms part of the need identified by the city council as explained in further detail in the Housing Topic Paper (TOP-01). Based on this evidence, it is considered that the identified need for extra care housing in Exeter will be provide for.

2.2. Issue 2 Question 6

Are the affordable housing requirements in Policies H8 and H9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 2.2.1. DCC needs to maximise the provision of affordable specialist provision to ensure that accommodation meets the needs of the adults and older people who the county council supports and have the greatest need. In 2025 DCC, Torbay Council and all eight of Devon's district/city councils collectively commissioned the preparation of the Supported and Specialist Housing and Accommodation Needs Assessments, which are currently awaiting publication. These evidence base documents will identify the need for specialist accommodation for a range of people with specialist needs including older people and people with disabilities. These assessments will break down need for accommodation types by tenure which will highlight the specific need for affordable provision. It is expected that this evidence will be published in 2026. DCC therefore considers the inclusion of criterion f. in Policy H8 and criterion g. in Policy H9 to be necessary.

2.3. Issue 2 Question 10

Are policies H5, H6, H8, H9, H10 and H12 positively prepared, justified, effective and consistent with national planning policy?

- 2.3.1. The county council consider policies H8 and H9 to be justified, consistent with national planning policy and based on robust up to date evidence. DCC has not commented on policies H5, H6, H10 and H12 in this regard as they fall outside of the scope of the authority.

3. Issue 4 Questions

3.1. Issue 4 Question 1

What is the total need figure over the plan period? What is it based on and how has it been calculated? Is the Exeter City Council Gypsy and Traveller Accommodation Assessment and its methodology appropriate and sufficiently robust?

- 3.1.1. The county council considers the city council's Gypsy and Traveller Accommodation Assessment (GTAA) (EVB-H-01e), its methodology and the supporting Gypsy and Traveller Accommodation Topic Paper (TOP-03) to be appropriate and sufficiently robust, taking into account the planning definitions of Gypsy and Traveller and Travelling Showperson households contained in the 2023 Planning Policy for Traveller Sites (PPTS).

3.2. Issue 4 Question 3

Does the Plan make suitable provision to meet identified needs? Will needs be met in full? Is there an over-reliance on windfall sites to meet these needs? If so, is this approach justified?

- 3.2.1. Paragraph 63 of the Framework states that: 'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies' and specifies that 'These groups should include [...] travellers'. Planning Policy for Traveller Sites 2023 sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.
- 3.2.2. The county council accepts the conclusions of the GTAA (EVB-H-01e) and the Gypsy and Traveller Accommodation topic paper (TOP-03) in that it:
- does not identify the need for any permanent pitches arising from Gypsies and Travellers currently living in bricks and mortar;
 - identifies a need for up to one pitch for undetermined households (who need to be assessed as part of the GTAA because they may meet the 2023 PPTS planning definition of a Gypsy and Traveller) which could arise in the period 2033-2037; and

- identifies a need for five permanent pitches for households that do not meet the planning definition but whose needs must be considered as part of the wider housing needs of the local authority area.
- 3.2.3. DCC's Regulation 19 consultation response (A-01-Various Devon County Council Letter) raised concerns that the reliance of gypsy and traveller pitches through windfall sites does not offer the same level of certainty that allocating a specific site would. The county council now accepts that whilst there is a reliance on windfall site(s) to meet these needs, the city council's conclusion with regards to the viability of delivering a single site through any other means than windfall seems reasonable and justifiable. The county council also recognises the work that has preceded the submission of the Local Plan to identify sites through the HELAA process, discussions with the county council to ascertain if there were suitable sites within DCC's ownership and an ongoing commitment, set out within the Gypsy and Traveller Accommodation Topic Paper (TOP-03), for additional calls for sites and ongoing review of local authority-owned land. The county council considers that the previous concern over windfall sites can be addressed through SAMM42 which adds wording to ensure a review of the need for, and delivery of, gypsy and traveller accommodation as part of the local plan review, as indicated in the agreed SOCG (DTC-03b).

3.3. Issue 4 Question 4

Has the Council identified any needs for transit site provision, and how will these needs be met?

- 3.3.1. DCC has been actively participating in discussions with the city council and four other partner local authorities with regards to the collection of data for Gypsy, Roma, and Traveller unauthorised encampments in order to evidence the need for transit style provision. The county council welcomes this cross authority approach.

3.4. Issue 4 Question 6

Is Policy H11 positively prepared, justified, effective and consistent with national planning policy as set out in paragraph 63 of the Framework?

- 3.4.1. The county council considers Policy H11 to have been positively prepared and is justified, effective and consistent with national planning policy as set out in paragraph 63 of the Framework.