

Exeter Plan

Statement of Common Ground

Exeter Housing Market Area

Exeter City Council and East Devon, Mid Devon and Teignbridge District Councils

May 2025

Exeter City Council
Civic Centre
Paris Street
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1. Introduction

- 1.1. Exeter City Council (the City Council) have been preparing the Exeter Plan since late 2020. The Plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 1.2. Following the end of the publication process in February 2025, representations have been compiled, and attention has turned to addressing the issues raised in the representations.
- 1.3. The Exeter Housing Market Area broadly covers the administrative area of Exeter City Council (the City Council) and the administrative areas of East Devon District Council (EDDC), Mid Devon District Council (MDDC) and Teignbridge District Council (TDC)¹. This Statement of Common Ground:
 - Demonstrates that the City Council and EDDC, MDDC and TDC have cooperated on strategic matters relating to meeting housing needs within the Exeter Housing Market Area from the outset of plan-making;
 - Demonstrates that all issues raised by EDDC, MDDC and TDC in response to the Regulation 19 Exeter Plan have been addressed by the City Council;
 - Demonstrates that the Exeter Plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph of the National Planning Policy Framework²;
 - Assists in presenting evidence that the Exeter Plan is deliverable over the plan period and based on effective joint working across local authority boundaries; and
 - Assist in demonstrating compliance with the Duty to Cooperate.
- 1.4. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance³ and meets the requirements of the Planning and Compulsory Purchase Act 2004⁴ and the Localism Act 2011⁵.

¹ See appendix B of the 2022 Exeter LHNA, ORS.

² The Exeter Plan is being prepared under the December 2023 version of the NPPF. Available here:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³ Available at: <https://www.gov.uk/guidance/plan-making>

⁴ Available at: <https://www.legislation.gov.uk/ukpga/2004/5/section/13>

⁵ Available at: <https://www.legislation.gov.uk/ukpga/2011/20/section/110>

2. Strategic matters: Homes

Broad summary of chapter content

- 2.1 Housing is a significant issue nationally and for Exeter. The Exeter Plan will meet the city's housing requirement within the administrative boundary of Exeter City. It will also help to address the housing needs of those who require affordable housing, families with children, older people, students, people with disabilities, Gypsies and Travellers, people who rent their homes and people wishing to commission or build their own homes.
- 2.2 The homes chapter includes sixteen policies which will help to address housing needs in the city:
- H1: Housing requirement;
 - H2: Housing allocations and windfalls;
 - H3: Regeneration opportunity areas;
 - H4: Affordable housing;
 - H5: Build to rent;
 - H6: Co-living housing;
 - H7: Custom and self-build housing;
 - H8: Homes for older people;
 - H9: Supported housing;
 - H10: Purpose built student accommodation;
 - H11: Gypsy and traveller accommodation;
 - H12: Residential conversions and houses in multiple occupation;
 - H13: Loss of residential accommodation;
 - H14: Accessible homes;
 - H15: Housing density and size mix; and
 - H16: Residential amenity and healthy homes.

The Exeter Housing Market Area

- 2.3 The four local authorities of Exeter City Council and East Devon (EDDC), Mid Devon (MDDC) and Teignbridge (TDC) District Councils agree that, together, they broadly function as one housing market area – the Exeter Housing Market Area (HMA). This agreement is evidenced by joint working on the following key documents:
- Our Shared Coordinates (2023)⁶: A non-statutory Joint Strategy prepared by the four local authorities working in partnership with Devon County Council. The document reflects the ambitions and proposals of existing and emerging Local Plans across the area, setting out shared ambitions, linkages and priorities across a range of strategic planning matters including the delivery of new homes to meet the housing needs of the Exeter HMA. The Joint Strategy demonstrates the commitment to ongoing joint working across the area on strategic matters including housing. It was approved by the City Council's Executive in November 2023 and has also been approved by EDDC, MDDC and TDC; East Devon, Mid Devon and Teignbridge District Councils;
 - Local Housing Needs Assessment (2022)⁷: A joint commission with EDDC, MDDC and TDC, with one consultant appointed to prepare LHNAs for each local authority following the same methodology;
 - Gypsy and Traveller Accommodation Assessment (2024)⁸: A joint commission with EDDC, MDDC and TDC, with one consultant appointed to prepared GTAA's for each local authority following the same methodology; and
 - Housing and Economic Land Availability Assessment Methodology (2021)⁹: A methodology developed jointly by the City Council, EDDC, MDDC and TDC to ensure that HELAA are prepared consistently across the Exeter HMA.
- 2.4 EDDC, MDDC and TDC have also met regularly with the City Council throughout the process of preparing the Exeter Plan, including to discuss how to meet housing needs within the Exeter HMA.
- 2.5 The above demonstrates that there has been joint working between the City Council and EDDC, MDDC and TDC since the outset of plan-making.

⁶ Our Shared Coordinates: A joint strategy for East Devon, Exeter, Mid Devon and Teignbridge. EDDC, ECC. MDDC and TDC in partnership with Devon County Council. January 2024.

⁷ 2022 Exeter Local Housing Needs Assessment, ORS. September 2022.

⁸ Gypsy and Traveller Accommodation Assessment, ORS. September 2024.

⁹ HELAA Methodology, EDDC, ECC, MDDC and Dartmoor National Park Authority. May 2021.

Responses to the Regulation 19 Exeter Plan

- 2.6 EDDC, MDDC and TDC have all provided representations or comments on the Regulation 19 Exeter Plan. Of these representations or comments, only one, made by MDDC, relates to meeting the housing needs of the Exeter Housing Market Area. The representation is supportive and finds the Exeter Plan to be sound:

Issue	Element of the plan	Organisation's representation	ECC comment	Organisation's comment	Final position and suggested plan modification
Homes	Policy H1	We support Policy H1 which makes clear that Exeter City will meet its housing requirement in full.	Support welcome.	n/a	n/a

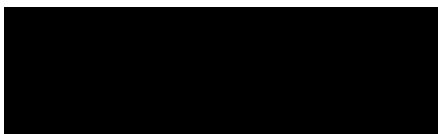
Agreed Outcomes

- 2.7 The following Duty to Cooperate outcomes are agreed by the City Council, EDDC, MDDC and TDC, relevant to this theme:
- The Exeter Plan is seeking to meet the entirety of Exeter's housing requirement;
 - EDDC, MDDC and TDC do not require the Exeter Plan to meet their housing needs; and
 - The Exeter Plan is seeking to provide for a range of evidenced housing needs (within the limitations of development viability and the need to ensure that suitable infrastructure and mitigations are delivered alongside development).
- 2.8 There are no areas of disagreement between the City Council and EDDC, MDDC and TDC relevant to this theme.

3. Governance, review and signoff

- 3.1 The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon relating to meeting housing needs within the Exeter Housing Market Area.
- 3.2 It is agreed that these discussions will inform the Examination of the Exeter Plan (the local plan). All parties will continue to work collaboratively to meet the Duty to Cooperate obligations and will both continue to work proactively on the key strategic cross boundary issues identified in this document.

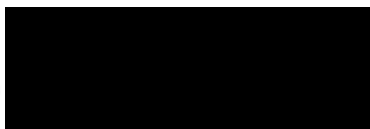
Signed:



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