

Exeter Plan

Hearing statement

Matter 5:
Housing Land Supply

February 2026

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



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1. Introduction

- 1.1 This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 5, which addresses housing land supply.
- 1.2 The statement covers two issues:
 - Issue 1: Total housing land supply.
 - Issue 2: Five-year housing land supply.

2. Issue 1: Total Housing Land Supply

Q1. Is there convincing evidence to demonstrate that the Plan's housing requirement to the end of the plan period will be met?

- 2.1 The housing trajectory in the Publication Plan (CSD-02: pages 166-167) shows there was a sufficient supply of housing to meet the housing requirement at Regulation 19 stage.
- 2.2 The housing supply position has changed since Regulation 19 stage – as it does over time – and this has altered the make-up of the housing supply. The Council has identified new housing supply figures, correct at the time of plan submission. The new supply figures are reflected in the Exeter Plan Housing Trajectory (EVB-H-03: in particular, the trajectory overview on page 5) and modifications suggested by the Council to policy H1 and the housing trajectory in the plan (CSD-03: pages 5 and 58, SMM8 and SMM27). The new supply figures relate to a plan period of 2022 to 2042 (as per CSD-03: page 3, SMM1).
- 2.3 Convincing, proportionate evidence to show that the housing requirement to the end of the plan period will be met is provided in:
- The Exeter Plan Housing Trajectory (EVB-H-03), which provides a detailed breakdown of delivery from sites with planning permission, site allocations and windfalls.
 - The 2025 September 5 Year Housing Land Supply Statement (2025 Sept 5YHLSS) (EVB-H-04a), which contains deliverability evidence for sites included in the five-year housing land supply and the Plan's windfall allowance (chapter 4, pages 8 to 13; appendix C, pages 40 to 53; appendix E, page 57; and appendices G and H, pages 63 to 82).
 - The Exeter Plan Delivery Schedule (EVB-H-06), which summarises deliverability evidence for sites identified for allocation in policy H2.
 - The Exeter Housing Market Insights Report (EVB-H-12) which supports delivery assumptions in the trajectory by demonstrating that there is a strong appetite for brownfield development in Exeter (see page 22).
 - The Exeter Housing and Economic Land Availability Assessment (HELAA) (EVB-H-02a-d) and supplementary Site Availability Evidence (EXM-02o) which demonstrate that sites allocated in policy H2¹ are suitable, available and achievable for housing development.
 - The Local Plan Viability Assessment (EVB-IF-01a) and Local Plan Viability Assessment – Addendum (EVB-IF-01b), which demonstrate that sites allocated in policy H2 and the Plan's spatial strategy are viable.

¹ Except for 88 Honiton Road, Land at Hamlin Lane and Belle Isle Depot, which the Council suggests are omitted as allocations following additional work on availability and suitability. See SMM20, SMM26 and SMM27 of the Schedule of Suggested Modifications (CSD-03).

- The Housing Topic Paper (TOP-01: section 3, pages 12 to 20), which provides a summary of evidence to show that the housing requirement will be met over the plan period.

2.4 *Please note that, for the rest of this Statement, the Council has responded to questions based on the housing supply figures in suggested main modification SMM8 (CSD-03: page 5), which derive from the Exeter Plan Housing Trajectory (EVB-H-03). That is because EVB-H-03 contains the most up-to-date, evidenced supply figures available.*

Q2. Is there convincing evidence to demonstrate that there is a reasonable prospect of a five-year supply of deliverable land for housing being maintained throughout the plan period?

2.5 As set out in the Council's responses to Matter 5, Issue 2, there is convincing evidence to demonstrate that there will be a five-year supply of deliverable land for housing following the intended date of Plan adoption, as required by NPPF paragraph 69a.

2.6 As regards the rest of the plan period, the Exeter Plan Housing Trajectory (EVB-H-03: page 5) shows some fluctuations in annual housing supply to 2042. These fluctuations largely result from the use of standard lead-in time and build-out rate assumptions, which are contained in the 2021 HELAA Methodology (EVB-H-02e: page 20) and have been agreed with the HELAA Panel (comprising representatives of the housebuilding industry). In reality, annual fluctuations in housing supply are likely to be less pronounced. Table 1 below shows that total predicted housing supply in the first ten years of the post-adoption plan period will exceed the housing requirement for that period, including a 20% buffer as required by (2024) NPPF paragraph 78(c). This demonstrates that there is a reasonable prospect of a five-year supply of deliverable land for housing being maintained during those ten years.

Table 1: Housing supply compared to housing requirement in the first ten years of the Plan, post-adoption		
Post-adoption period	Housing supply	Housing requirement ((642+ 20% buffer) x 10)
Years 1-10 (2027/28-2036/37)	8,130	7,770

2.7 EVB-H-03 (page 5) shows supply decreasing during the last five years of the plan period, as smaller site allocations are built out. However, as required by the NPPF, a Local Plan review will be needed within the next five years. The review process will ensure that a five-year land supply is maintained in the longer term.

Q3. What are the implications of the proposed revision of the plan period on overall housing supply?

2.8 The housing supply figures in suggested modification SMM8 (CSD-03: page 5) and the Exeter Plan Housing Trajectory (EXM-H-03) cover a plan period of 2022-2042. As set out in the Council's response to question 1 above, there is convincing evidence to demonstrate that the housing requirement will be met under a 2022-2042 plan period (as suggested by CSD-03: page 3, SMM1).

Q4. What proportion of the total housing supply is derived from purpose-built student accommodation? Is the Plan over-reliant on the provision of this type of accommodation to meet the housing requirement?

- 2.9 *As regards this question, please note that there are inaccuracies in the penultimate and final rows of table 4 on page 32 of the Housing Topic Paper (TOP-01). These inaccuracies affect the commentary in paragraph 6.3 of TOP-01. The inaccuracies are corrected below, including in table 2.*
- 2.10 Table 2 shows how purpose-built student accommodation (PBSA) contributes to the overall housing supply figure in the Exeter Plan Housing Trajectory (14,119 homes – see EXM-H-03: page 5). The ‘dwellings equivalent’ figures in table 2 have been calculated consistent with methodologies in national policy, as explained in the Housing Topic Paper (TOP-01: page 13, paragraph 3.6).

Table 2: PBSA supply 2022-2042		
Source	PBSA bedspaces	Dwellings equivalent
Completions	383	214
2022/23	207	115
2023/24	75	55
2024/25	101	44
Planning permissions at 1 April 2025 ²	2,092	1,123
Housing allocations	1,101	897
East Gate: Clarendon House	202	202
Heavitree Road Police Station	399	399
Red Cow	334	197
Rougemont Switching Centre	74	43
Land at Exeter Squash Club	41	24
Land & buildings at Victoria St	41	24
Fever and Boutique	10	8
Windfalls	1,421	998
Total	4,997	3,232

- 2.11 PBSA completions since 2022/23 have contributed 214 homes to the supply figures. PBSA permissions (and planning applications with resolution to approve consent) at 1 April 2025 include the equivalent of 1,123 homes.
- 2.12 The Council has taken a robust approach to estimate how much of the housing supply may derive from PBSA delivered on windfalls or allocated sites. In terms of windfalls, the Council’s response to Matter 5, Issue 1, Question 5 explains that the Plan’s windfall allowance is based on consideration of historic windfall rates over the past 10 years and expected future trends. PBSA contributed an average of 142.1 bedspaces (equivalent to 99.8 homes) per year to the historic windfall rate for major sites. Given the University of Exeter’s growth ambitions (please see paragraph 2.14 below), the Council has taken the reasonable approach of projecting the historic PBSA windfall rate forwards. On that basis, the Council anticipates that PBSA windfalls will contribute the equivalent of 998 homes to the supply figures, over the 2032/33 to 2041/42 period.

² EXM-H-03: page 37, site ref. MSO06(S); page 38, site ref. MSD44(S); page 39, site ref. MSD45; page 40, site ref. MSD46; and page 41, site ref. MSD47.

- 2.13 In terms of sites allocated for housing in policy H2, the Council has assumed that:
- East Gate: Clarendon House will deliver 202 PBSA studio flats (equivalent to 202 homes), as per planning application 25/1082/FUL, which benefits from a resolution to approve consent (see EVB-H-03: page 62, site ref. 145/103; and EVB-H-04a: page 63).
 - Heavitree Road Police Station will deliver 399 PBSA studio flats (equivalent to 399 homes), as per planning application 25/0676/FUL, which benefits from a resolution to approve consent (see EVB-H-03: page 63, site ref. 104; and EVB-H-04a: page 64).
 - A further 500 PBSA bedspaces may be delivered on five other site allocations (equivalent to 296 homes³). This assumption is justified on grounds that the sites were submitted to be assessed in the HELAA process for a range of housing, including PBSA. In the absence of clear evidence to indicate how much PBSA these sites may deliver, table 2 assumes that 50% of the housing supply from the sites may be in the form of PBSA.
- 2.14 In total, the Council anticipates that PBSA will contribute the equivalent of 3,232 homes to the housing supply identified in the Exeter Plan Housing Trajectory (EVB-H-03: page 5). This is 23% of the total housing supply (3,232/14,119 x 100). This demonstrates that the Plan is not overly reliant on PBSA to meet the housing requirement.
- 2.15 Further evidence that the Plan is not overly reliant on PBSA to meet the housing requirement is provided in:
- The 2024 Greater Exeter: Student Housing Needs Assessment (EVB-H-01d: pages 9 and 10, paragraphs 25 and 26), prepared by specialist consultants ORS. This shows that Exeter's local housing need (LHN) fully accounts for student population growth, meaning it is reasonable to include PBSA in the housing supply. Specifically, EVB-H-01d shows that the LHN has the potential to accommodate an additional 750 students per annum. As stated in the Housing Topic Paper (TOP-01: pages 9-10, paragraphs 2.28 to 2.29), it can therefore be concluded that the LHN (which is the same as the housing requirement) includes housing which could accommodate at least 15,000 additional students over the Plan period (750 x 20 year). The Plan's housing supply figures include 4,997 student bedspaces, which is far less than 15,000.
 - The University of Exeter's Regulation 19 representation (C-41, policy S1) makes it clear that the University is planning for continued growth to 2040, that it considers student housing to be a vital component of the city's overall housing supply, and that it regards the provision of additional PBSA to be a priority. Overall, the response provides clarity of an ongoing and increasing need for student accommodation in Exeter.

³ In the absence of clear evidence to base assumptions upon, for each site the Council has assumed that 50% of the PBSA will be delivered as studio flats and 50% as cluster flats.

Q5. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?

- 2.16 The Exeter Plan Housing Trajectory EXM-H-03: pages 5 and 59) and suggested modification SMM8 (CSD-03: page 5) include a windfall allowance of 1,998 homes. As required by NPPF paragraph 72, this is based on evidence of historic windfall rates, consideration of the Strategic Housing Land Availability Assessment (which for Exeter comprises the HELAA and Urban Capacity Studies) and expected future trends.

Historic windfall delivery rates

- 2.17 The 2025 September 5YHLSS assesses historic windfall delivery rates (EVB-H-04a: pages 11 to 13, paragraphs 4.16 to 4.23; and pages 68 to 82, Appendix H). EVB-H-04a (page 12, table 3) shows that, over the past 10 years, small windfall sites of up to 9 homes have delivered an average of 47 homes per year and major windfall sites of 10+ homes have delivered an average of 140 homes per year.
- 2.18 To calculate these historic windfall rates, the Council has taken the following robust approach:
- As per the NPPF's definition of a windfall site, no completions on sites specifically identified in the development plan are included in the rates.
 - In addition, to avoid over-estimating the historic windfall rates (because the Exeter Core Strategy was adopted in 2012), no completions on sites assessed in the seven HELAAs published by the Council since 2012 are included in the rates (see EVB-H-02a, EVB-H-02b, EVB-H-02c, EVB-H-02d. In addition, HELAA were published in 2010, 2015 and 2019).
 - In addition, no completions on residential gardens (amounting to 78 homes over the 10-year period) are included in the rates.
- 2.19 As a result of this approach, the historic windfall rates largely derive from completions on brownfield sites within the urban area. Given the Plan's strategic focus on brownfield development, the historic rates provide a good indication of future windfall provision.

Strategic Housing Land Availability Assessment

- 2.20 The Council has used the HELAAs (EVB-H-02a-d) and Urban Capacity Studies (EVB-H-10b, EVB-H-10d) to identify as many sites capable of delivering schemes of 5+ homes as possible, so they can be allocated in the Plan for housing.
- 2.21 However, appendix A to this statement lists twenty major and small brownfield sites that were assessed as deliverable/developable in the HELAA and/or Urban Capacity Studies but are not allocated for housing in the Plan (for reasons set out in the appendix). These sites have a total assessed housing capacity of c.2,040 homes and provide a clear source of potential windfalls for the Plan period.
- 2.22 It seems highly unlikely that these sites will be the only source of windfalls, given the historic windfall rates set out above. In particular, the HELAAs and

Urban Capacity Study do not assess, and the Plan does not allocate, sites with a capacity of 1-4 homes. Over the past 10 years, brownfield developments of 1-4 homes (i.e. conversions, changes of use and redevelopments) have contributed an average of 40 homes per year to the housing supply. These developments were located across the city. There is no evidence that windfall delivery from these sources will reduce going forwards.

Expected future trends

- 2.23 The Plan supports a continuance of past historic windfall rates by:
- In policy S1(5), supporting the development of brownfield sites.
 - In policy H2, supporting windfall development within the urban boundary.
 - Policy H3, supporting windfall development through regeneration.
 - In policy H11(e), supporting the delivery of windfall housing for Gypsies and Travellers outside the urban boundary (CSD-03: page 17, SMM43).
 - In policy H12, supporting residential conversions or changes of use.
 - In policy H15, supporting optimal housing densities, including on windfall sites.
- 2.24 The Plan therefore provides a positive strategy for ongoing windfall development.
- 2.25 Whilst the Council considers there is compelling evidence to support the windfall allowance contained in the Exeter Plan Housing Trajectory (EVB-H-03: page 59), a sensitivity check against lower annual average windfall rates experienced in Exeter over the past five years (derived from EVB-H-04a: page 12, table 3) has been undertaken to understand whether this would impact on the ability to meet the housing requirement. The sensitivity check calculations are shown in appendix B to this statement. They show that the housing requirement and a healthy (7%) headroom will still be satisfied, if a lower annual windfall allowance is assumed.
- Q6. Paragraph 70 of the Framework sets out that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise (SME) housebuilders to deliver new homes and are often built out relatively quickly. How are SME housebuilders supported in the plan?**
- 2.26 The Plan supports SME housebuilders by:
- In policy H2, allocating twenty-six sites for housing development that measure no larger than 1 hectare. The sites are listed in the Housing Topic Paper (TOP-01: pages 18-19, table 2). The housing capacity of these sites equates to just under 10% of the housing requirement (9.55%).

- In policy H2, supporting the development of windfall sites. This is consistent with NPPF paragraph 70(d).
- In policy H7, requiring 5% of plots on sites proposing twenty or more homes to be made available to custom- or self-housebuilders. This is consistent with NPPF paragraphs 70(b) and 70(d).
- In policies SBA1-5, requiring strategic mixed-use brownfield allocations to include serviced plots for custom and self-build homes, in accordance with policy H7. This is consistent with NPPF paragraphs 70(b) and 70(d).

2.27 The Council will also support SME housebuilders who propose community-led exception development, provided that the proposals comply with paragraph 73 of the NPPF and relevant policies in the development plan.

Q7. How has the limited capacity of the existing power grid network in Exeter been considered? Does this have any impact on the total housing supply?

2.28 Please see the Council's response to Matter 2, Issue 1, Question 5, which answers this question. In summary, NGED have plans in place to meet the capacity demands of the Plan's housing requirement, in a way that will support delivery timings in the Exeter Plan Housing Trajectory (EVB-H-03: page 5).

Q8. In terms of this issue, are any of the other suggested modifications in the Schedule of Modifications necessary for soundness?

2.29 Suggested main modification SMM8 (CSD-03: page 5) is necessary in terms of test of soundness d) – consistent with national policy. The modification will provide for a 15-year post-adoption plan period, consistent with NPPF paragraph 22.

2.30 Suggested main modification SMM9 (CSD-03: page 6) is necessary in terms of test of soundness b) – justified. The revised housing supply figures are justified by up-to-date, proportionate evidence.

2.31 Various other modifications are suggested to the supporting text (CSD-03: page 53, SAMM 19; and pages 122-124, SAMM127). Whilst it is not considered that these modifications are required for soundness, they do address concerns made by other parties and will make the Plan more effective.

3 Issue 2: Five-Year Housing Land Supply

Q1. What is the five-year housing land requirement?

- 3.1 The 2025 Sept 5YHLSS (EVB-H-04a: page 7, table 1) identifies a housing land requirement of 3,531 homes. The requirement is based on an annual housing requirement of 642 homes plus a 10% buffer, consistent with national policy (EVB-H-04a: pages 4-13). The methodology used to calculate the requirement is consistent with national policy (EVB-H-04a: page 4, paragraphs 2.3 to 2.4; and page 7, paragraphs 3.1 to 3.6).

Q2. Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

- 3.2 The five-year housing land supply has been calculated with a base date of 1 April 2027, because the Council anticipates that the Plan will be adopted by 1 April 2027.
- 3.3 The Council expects that 3,812 homes (net) will be delivered in the first five years following adoption of the Plan. The calculation of supply is summarised in EVB-H-04a: page 14, table 4.

Q3. What evidence has the Council used to determine which sites will come forward for development and when. Is it robust?

- 3.4 EVB-H-04a (page 8, paragraphs 4.2 to 4.4) explains the range of evidence used by the Council to determine which sites will come forwards for development:
- Site-specific correspondence over the six months to September 2025 with developers, landowners and agents of major sites.
 - Intelligence provided by experienced planning officers working on projects associated with the sites.
 - A review of the status of planning applications and permissions.
 - The model contained in appendix 2 of the 2021 HELAA Methodology (EVB-H-02e: page 20), which is replicated in EVB-H-04a (page 9). The model contains basic assumptions about development lead-in times and build-rates, which local authorities using EVB-H-02e can apply in the absence of other robust evidence. The model has been endorsed by the HELAA Panel – an independent group of representatives from the housebuilding industry.
- 3.5 By using a range of evidence and the HELAA model as a fall-back position, the Council has ensured that EVB-H-04a provides a robust assessment of land supply.

Q4. Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

- 3.6 The five-year housing land supply includes only five sites that are identified in the Plan and did not have planning permission at 1 April 2025. The sites are proposed for allocation in policy H2, are shown in the trajectory at appendix F of the 2025 Sept 5YHLSS (EVB-H-04a: pages 58-62) and are listed in table 3 below.
- 3.7 Clear evidence that housing completions will begin on these sites is provided in appendix G of EVB-H-04a (pages 63-67).
- 3.8 Table 3 updates the information in appendix G and shows that the sites are still on course to deliver homes within the five-year period.

Table 3: Sites in the 5YHLSS that do not yet have planning permission – progress with delivery	
Site	Additional progress made
Site ref. 145/103: East Gate, Clarendon House	- Planning application 25/1082/FUL was reconsulted upon in late 2025, following minor design changes. The total number of PBSA units has not changed. - On 9 February 2026, the Council's Planning Committee resolved to grant planning permission to application 25/1082/FUL, subject to completion of a Section 106 Agreement. This is only two months later than was anticipated by the site agent and Council when the 2025 September 5YHLSS was prepared (see EVB-H-04a: page 63). - Work on the S106 Agreement is progressing. - As the delay only amounts to two months, and as appendix G of EVB-H-04a (page 59) shows full completion of the scheme in 2028/29 (year 2), it is reasonable to assume that development is on track to be completed within the five-year period.
Site ref. 104: Heavitree Road Police Station	- On 8 December 2025, the Council's Planning Committee resolved to grant permission to application 25/0676/FUL, subject to completion of a S106 Agreement. This is only slightly later than was anticipated by the site agent and Council when the 2025 Sept 5YHLSS was prepared (see EVB-H-04a: page 64). - Work on the S106 Agreement is progressing. - As the delay is slight, and as appendix G of EVB-H-04a (page 60) shows full completion of the scheme in 2028/29 (year 2), it is reasonable to assume that development is on track to be completed within the five-year period.
Site ref. 18: Land adjoining Silverlands	- Pre-application discussions between the Council and Edenstone Homes have progressed since completion of the 2025 Sept 5YHLSS (site ref. 24.1473/MP). Edenstone now proposes to enlarge the site to include an adjoining property and to develop more homes (67

	net) than are included in the trajectory/shown in policy H2 of the Plan (55). - Planning officers are broadly content with the proposed site layout. - Edenstone has informally advised the Council that it expects to submit a planning application in April/May 2026. This is 4-5 months later than anticipated by Edenstone and the Council when the 2025 Sept 5YHLSS was prepared (see EVB-H-04a: page 65). - As the delay amounts to only 4-5 months, and as appendix G of EVB-H-04a (page 60) shows full completion of the scheme in 2028/29 (year 2), it is reasonable to assume that development is on track to be completed within the five-year period.
Site ref. 95: Land at Topsham Golf Academy	- On 1 December 2025, the Council's Planning Committee resolved to grant permission for application 24/0785/FUL, subject to completion of a S106 Agreement. This is consistent with the Committee date anticipated by the Council and the developer when the 2025 Sept 5YHLSS was prepared (see EVB-H-04a: page 66). - Work on the S106 Agreement is progressing. - As there has been no delay to the Committee date, and as appendix G of EVB-H-04a (page 60) shows full completion of the scheme in 2029/30 (year 3), it is reasonable to assume that development is on track to be completed within the five-year period.
Site ref. 153: Land to the east of Newcourt Road	- When the 2025 Sept 5YHLSS was prepared, the Council and developer expected that the application would be determined by Planning Committee towards the end of 2025. A Committee decision proved unnecessary: in October 2025, Members agreed that planning application 24/1425/FUL could be permitted under delegated powers subject to completion of a Section 106 Agreement. - Work on the S106 Agreement is progressing. - As there has been minimal delay in determining the application, and appendix G of EVB-H-04a (page 61) shows full completion of the scheme in 2028/29 (year 2), it is reasonable to assume that development is on track to be completed within the five-year period.

Q5. Is there convincing evidence to demonstrate that there will be a five-year supply of deliverable land for housing following adoption of the plan with an appropriate buffer applied?

3.9 Convincing site-by-site evidence showing there will be a five-year supply of deliverable land following adoption of the plan, with an appropriate buffer applied, is provided in the appendices to the 2025 Sept 5YHLSS (EVB-H-04a), as follows:

- Major sites with detailed permission: please see the penultimate column of the trajectory at appendix B (pages 25 to 39), and evidence in appendix C (pages 40 to 53).

- Major sites with outline permission: please see the penultimate column of the trajectory at appendix D (pages 54 to 56), and evidence in appendix E (page 57).
- Site allocations in the Plan: please see the penultimate column of the trajectory at appendix F (pages 58 to 62).
- Small sites with planning permission: please see the penultimate column of the trajectory at appendix A (pages 16 to 24). EVB-H-04a (page 9, paragraph 4.5) explains that most deliverable small sites are expected to be completed before 1 April 2027 and so do not contribute to the five - year supply.

Q6. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 72 of the Framework?

- 3.10 The five-year housing land supply includes an allowance of 234 homes for windfall developments of 1-9 homes. It does not include an allowance for windfall developments of 10+ homes (EVB-H-04a: page 14, table 4).
- 3.11 Historic windfall rates, the SHLAA and expected future trends provide compelling evidence that windfall sites of 1-9 homes will come forward during the five-year period. This evidence is provided in EVB-H-04a (pages 11 to 13, paragraphs 4.16 to 4.23; and pages 68 to 82, Appendix H) and in the Council's response to Matter 5, Issue 1, Question 5 above.
- 3.12 Whilst the Council considers that the evidence to support the windfall allowance in the five-year supply is compelling, a sensitivity check against lower annual average windfall rates (derived from EVB-H-04a: page 12, table 3) has been undertaken to understand whether this would impact on the ability to meet the five-year housing land requirement. The sensitivity check calculations are shown in appendix B to this statement. They show that the five-year housing land requirement can still be satisfied with a lower annual windfall allowance.

Q7. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

- 3.13 The Sept 2025 5YHLSS (EVB-H-04a: page 14, paragraph 4.25 and table 5) shows there will be a housing supply equating to five years and 4.9 months on adoption of the Plan. This exceeds the five-year housing land requirement by 281 homes.

Q8. What flexibility does the Plan provide if some of the larger sites, such as Water Lane, do not come forward in the timescales envisaged?

- 3.14 In terms of the five-year supply, the Plan includes flexibility of 281 homes. The five-year supply calculation also builds-in flexibility by incorporating a 10% buffer. It should be noted that, of the Plan's strategic mixed-use

brownfield allocations and large-scale residential allocations, only two land parcels are included the five-year housing land supply (East Gate: Clarendon House and Heavitree Road Police Station – see table 3 above). EVB-H-04a and table 3 provide proportionate evidence that these sites will come forward in the timescales envisaged.

- 3.15 The Housing Topic Paper (TOP-01: page 17, paragraph 3.27) explains that the Exeter Plan Housing Trajectory (EVB-H-03: page 5) includes a healthy headroom of 10%. This flexibility will ensure that the Plan's housing requirement is met, should some larger sites not come forward in the timescales envisaged.

Q9. What are the implications of the proposed revision of the plan period on the five-year housing land supply?

- 3.16 The proposed revision will have no impact on the five-year housing land supply, as it will not affect the date the Council anticipates the Plan will be adopted (1 April 2027).

Q10. In terms of this issue, are any of the other suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 3.17 Please see the Council's response to Matter 5, Issue 1, Question 8 above.
- 3.18 An additional/minor modification (CSD-03: SAMM50, page 50) is also suggested to the supporting text to add clarity; however, this is not required for soundness.

4 Summary

- 4.1 This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 5 of the Exeter Plan Examination.
- 4.2 All questions associated with the full range of issues for Matter 5 have been answered.

APPENDIX A: HELAA and Urban Capacity Study sites that are not allocated in the Exeter Plan, that may contribute to the windfall allowance

Site name	Evidence base	Assessed capacity	Commentary
Merrivale Road	EVb-H-02a: ref. 7, page 35	14 (net)	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Flowerpot Lane Car Park	EVb-H-02a: ref. 9, page 38	9	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Okehampton Street Car Park	EVb-H-02a: ref. 10, page 46	30	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Marsh Barton	EVb-H-02a: ref. 14, page 65	Up to 1,200 (calculated by halving the HELAA capacity (2,446)).	- Includes land parcels owned by the Council. - Not allocated for housing, because not all land parcels are known to be available. However, around 50% of the site is identified as a Regeneration Opportunity Area in policy H3. - Assessed in the HELAA as suitable, available and achievable for housing. Therefore, it is reasonable to assume (parts of) the ROA may deliver windfall homes over the Plan period, whilst also retaining existing levels of employment floorspace.
Land between St Anne's Well Brewery and Exeter College	EVb-H-02a: ref. 41, page 180	50	- Assessed in the HELAA as suitable, available and achievable for housing. - Not allocated for housing, because the site is occupied by a listed building and further detailed work is therefore needed to fully determine development capacity.

Site name	Evidence base	Assessed capacity	Commentary
			Subject to that work, the site may deliver windfall homes over the Plan period.
North Gate	EVb-H-02a: ref. 42, page 185	Up to 210 (calculated by deducting extant permissions and the capacity of Mary Arches Car Park allocation from the sites HELAA capacity (803))	- Council is the majority landowner. - Assessed in the HELAA as suitable, available and achievable for housing. - Identified as a Regeneration Opportunity Area in policy H3. - Not allocated for housing, because it is not in the Council's current delivery plan and because the site contains heritage assets. Therefore, further detailed work is needed to fully determine development capacity. - Subject to that work, parts of the site may deliver windfall homes over the Plan period.
Smythen Street Car Park	EVb-H-02a: ref. 45, page 197	20	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Howell Road Car Park	EVb-H-02a: ref. 50, page 221	79-106	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Parr Street Car Park	EVb-H-02a: ref. 56, page 255	5	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Fairbanks, 90 Polsloe Road	EVb-H-02aP ref. 58, page 279	10	- Assessed in the HELAA as suitable, available and achievable for housing. - Not allocated for housing because of a lack of current evidence that the site's existing community facility will be appropriately replaced. - Subject to that evidence, the site may deliver windfall homes over the Plan period.

Site name	Evidence base	Assessed capacity	Commentary
Magdalen Road Car Park	EVB-H-02a: ref. 69, page 275	40-60	- Owned by the Council. - Not allocated, because it is not in the Council's current housing delivery plan. - However, assessed in the HELAA as suitable, available and achievable for housing, so may deliver windfall homes over the Plan period.
Park and Ride Site, Digby Drive	EVB-H-02a: ref. 79, page 347	51	- Assessed in the HELAA as suitable, available and achievable for housing. - Not allocated for housing because of a lack of current evidence that the site's existing park and ride facility will be appropriately replaced. - Subject to that evidence, the site may deliver windfall homes over the Plan period.
Sowton Park and Ride, Sidmouth Road	EVB-H-02a: ref. 111, page 495	124	- Assessed in the HELAA as suitable, available and achievable for housing. - Not allocated for housing because of a lack of current evidence that the site's existing park and ride facility will be appropriately replaced. - Subject to that evidence, the site may deliver windfall homes over the Plan period.
DOA and Exeter Mobility Centre	EVB-H-02a: ref. 112, page 439	Not assessed in the HELAA. However, the site measures 0.82, which would provide 41 homes at 50dph.	- Owned by the NHS. - Assessed in the HELAA as suitable and achievable for housing. - Not allocated, because the NHS has advised the site is currently unavailable because it is being used for car parking. - However, this situation may change over the Plan period. The site may deliver windfall homes over the Plan period.
Falcon House, Falcon Road	EVB-H-0-02a: ref. 119, page 529	46	- Assessed in the HELAA as suitable, available and achievable for housing. - Not allocated for housing because of a lack of current evidence that the site's existing community facility will be appropriately replaced. - Subject to that evidence, the site may deliver windfall homes over the Plan period.
27-29 Fore Street	EVB-H-10a: page 63	7	Assessed in the Urban Capacity Study Part 1 as having capacity for redevelopment.

Site name	Evidence base	Assessed capacity	Commentary
			- Not assessed in the HELAA, or allocated in the Plan, because not confirmed as available for development. - However, the site may deliver windfall homes over the Plan period.
Gordons Place Car Park	EVB-H-10a: page 64	7	- Assessed in the Urban Capacity Study Part 1 as having capacity for redevelopment. - Not assessed in the HELAA, or allocated in the Plan, because not confirmed as available for development. - However, the site may deliver windfall homes over the Plan period.
Former Exeter Steiner School, 80 Merrivale Road	EVB-H-10a: page 289	5	- Assessed in the Urban Capacity Study Part 1 as having capacity for redevelopment. - Not assessed in the HELAA, or allocated in the Plan, because not confirmed as available for development. - However, the site may deliver windfall homes over the Plan period.
21 Okehampton Street	EVB-H-10a: page 291	5	- Assessed in the Urban Capacity Study Part 1 as having capacity for redevelopment. - Not assessed in the HELAA, or allocated in the Plan, because not confirmed as available for development. - However, the site may deliver windfall homes over the Plan period.
St Thomas Shopping Centre	EVB-H-10c: page 46	46-77	- Assessed in the Urban Capacity Study Phase 2 as having capacity for redevelopment. - Not assessed in the HELAA, or allocated in the Plan, because not confirmed as available for development. - However, the site may deliver windfall homes over the Plan period, alongside retail provision.
Total		2,038	

APPENDIX B: Windfall allowance sensitivity checkFuture windfall supply on sites of 10+ homes and 1-9 homes

This has been calculated as per Stage 4 of the methodology shown in the 2025 September 5YHLSS (EVB-H-04a: pages 80-81).

Sites of 10 homes			
Year	Average basic net windfall completion	Windfalls with consent/resolution to approve consent at 1 April 2025	Final future windfall allowance
2025/26	111	113	0
2026/27	111	0	111 (set to 0)
2027/28	111	130	0
2028/29	111	34	77 (set to 0)
2029/30	111	0	111 (set to 0)
2030/31	111	0	111 (set to 0)
2031/32	111	0	111 (set to 0)
2032/33	111	85	26
2033/34	111	16	95
2034/35	111	0	111
2035/36	111	0	111
2036/37	111	0	111
2037/38	111	0	111
2038/39	111	0	111
2039/40	111	0	111
2040/41	111	0	111
2041/42	111	0	111
		Total	1,009

Sites of 1-9 homes			
Year	Average basic net windfall completion	Windfalls with consent/resolution to approve consent at 1 April 2025	Final future windfall allowance
2025/26	40	15	25 (set to 0)
2026/27	40	69	0
2027/28	40	1	39
2028/29	40	0	40
2029/30	40	0	40
2030/31	40	0	40
2031/32	40	0	40
2032/33	40	5	40
2033/34	40	0	40
2034/35	40	0	40
2035/36	40	0	40
2036/37	40	0	40
2037/38	40	0	40
2038/39	40	0	40
2039/40	40	0	40
2040/41	40	0	40
2041/42	40	0	40
		Total	624

Housing supply with reduced windfall allowance, compared to the Plan's housing requirement.

A. Housing requirement (2022/23-2041/42)	12,840
B. Housing supply:	13,754
• Completions, 2022-2025	• 1,939

• Planning consents • Site allocations • Windfalls	• 5,416 • 4,766 • 1,633 (1,009 + 624)
C. Flexibility on housing (A-B)	914 7% headroom above the requirement

Housing supply with reduced windfall allowance, compared to the Plan's five-year housing land requirement

D. Five year housing land requirement (2027/28-2031/32)	3,531
E. Housing supply:	3,777
• Small sites with permission • Major sites with detailed permission • Major sites with outline permission • Sites allocated in a development plan • Windfall allowance: sites of 1-9 homes • Windfall allowance: sites of 10+ homes	• 1 • 2,314 • 112 • 1,151 • 199 • 0
F. Flexibility on housing (A-B)	246 7% headroom above the requirement