

Exeter Plan

Housing Topic Paper

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1. Introduction

- 1.1 This topic paper presents the policy background and key evidence supporting policies in the Homes chapter of the Exeter Plan (excluding Policy H7: Custom and self-build housing and Policy H11: Gypsy and Traveller accommodation, which are covered by separate topic papers).
- 1.2 The topic paper sits alongside and can be cross referenced with documents including the:
- Statement of Issues Report;
 - Suggested Modifications Report;
 - Exeter Housing Market Area Statement of Common Ground¹;
 - Exeter City Council and Torbay Council Statement of Common Ground²
 - Exeter Plan Housing Trajectory³;
 - August 2025 Exeter Five Year Housing Land Supply Statement⁴;
 - Exeter Plan Delivery Schedule⁵;
 - 2025 Exeter Housing and Economic Land Availability Assessment – Fourth Edition⁶ (2025 HELAA); and
 - Exeter Housing Market Insights Report⁷.
- 1.3 The Exeter Plan (the Plan) meets the requirements for applying the transitional arrangements detailed in paragraph 234a of the current National Planning Policy Framework (NPPF), published on 12 December 2024:
- The Plan reached Regulation 19 on 12 December 2024, which is before 12 March 2025; and
 - On 12 March 2025, the Plan's draft housing requirement was 642 homes per annum and Exeter's local housing need was 800 homes per annum⁸. 642 homes per annum equates to 80.25% of 800 homes per annum. As such, the Plan's draft housing requirement met at least 80% of local housing need.

¹ Exeter Plan SoCG: Exeter Housing Market Area: Exeter City Council and East Devon, Mid Devon, and Teignbridge District Councils. Exeter City Council. September 2025.

² Exeter Plan SoCG: Exeter City Council and Torbay Council. July 2025.

³ Exeter Plan Housing Trajectory. Exeter City Council. September 2025.

⁴ September 2025 Exeter Five Year Housing Land Supply Statement. Exeter City Council. September 2025.

⁵ Exeter Plan Delivery Schedule. Exeter City Council. September 2025.

⁶ 2025 Exeter Housing and Economic Land Availability Assessment – Fourth Edition. Exeter City Council, September 2025.

⁷ Exeter Housing Market Insights Report, Global City Futures. September 2025.

⁸ Proposed Reforms to the NPPF and Other Changes to the Planning System: Indicative LHN, December 2024 – new standard method spreadsheet. MHCLG. December 2024.

- 1.4 On this basis, the Plan will be examined under the previous version of the NPPF published on 19 December 2023⁹ (the 2023 NPPF) and associated Planning Practice Guidance.

⁹ [\[ARCHIVED CONTENT\]](#), DLUHC. December 2023.

2. Exeter Plan housing requirement

Local housing need

- 2.1 Paragraph 61 of the 2023 NPPF sets out that, to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment conducted using the 'standard method' in national planning guidance. An alternative approach should only be used where justified by exceptional circumstances.
- 2.2 Under the 2023 NPPF, the standard method uses inputs from the MHCLG 2014-based household projections and ONS median workplace-based affordability ratios, which are updated annually. It also incorporates a 35% uplift, to be applied to certain cities and urban centres. Exeter is not one of the cities or urban centres to which the uplift applies.
- 2.3 Figure 44 of the 2024 Exeter Local Housing Needs Assessment¹⁰ (page 61) (2024 LHNA) summarises the standard method calculation and the resulting local housing need (LHN) for Exeter (642 homes per annum) at the point the Plan reached Regulation 19 stage. In the absence of any demonstrable exceptional circumstances, Policy H1 (Housing requirement) of the Plan plans for minimum delivery of 12,840 homes over a twenty-year period (642 x 20).
- 2.4 Paragraph 61 of the 2023 NPPF states that, in addition to the LHN figure, any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for.
- 2.5 Exeter's immediate neighbours are East Devon, Mid Devon and Teignbridge District Councils. The four authorities broadly comprise the Exeter Housing Market Area (HMA). Through the duty to cooperate process and in the Exeter HMA Statement of Common Ground (SoCG), East Devon, Mid Devon and Teignbridge District Councils have confirmed that they do not require the Plan to meet any of their housing needs.
- 2.6 Torbay Council lies outside the Exeter HMA, does not border Exeter and broadly functions as a separate housing market area – the Torbay HMA. As detailed in paragraphs 4.5 to 4.6 of the Exeter City Council and Torbay Council SoCG, through a series of duty to cooperate meetings and in its response to the Plan Regulation 19 consultation, Torbay Council notified the City Council that it is unlikely to be able to meet all its housing need and this may impact on sub-regional plan preparation. Torbay Council has not yet specified how many homes Torbay can accommodate or how any deficit could be considered across the sub-region.
- 2.7 Since the Regulation 19 consultation, the City Council and Torbay Council have held further duty to cooperate discussions. This has culminated in both local authorities signing the Exeter City Council and Torbay Council SoCG, in which (amongst other things) it is agreed that the Plan cannot accommodate any of Torbay Council's unmet LHN.
- 2.8 No other local authorities have requested that the Plan accommodate any of their unmet housing needs.

¹⁰ 2024 Exeter Local Housing Needs Assessment, Opinion Research Services. December 2024.

- 2.9 Given these points, it is unnecessary for the Plan's LHN to take account of any housing needs that cannot be met within neighbouring areas.

The housing requirement

- 2.10 Paragraph 67 of the 2023 NPPF requires that the City Council establish a housing requirement figure for Exeter which shows the extent to which the identified LHN can be met over the Plan period. The figure may be higher than the LHN if, for example, it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment. The City Council has considered whether these or any other reasons justify setting Exeter's housing requirement above LHN, as set out below:

- **Provision for neighbouring areas**

- 2.11 Paragraphs 2.7 to 2.9 demonstrate that this is not required.

- **Economic growth or infrastructure investment**

- 2.12 The 2024 East Devon, Exeter, Mid Devon and Teignbridge LHNA: Jobs and Workers Balance Assessment¹¹ considers the balance between the City Council's economic aspirations and how these impact upon the LHN. The work builds on the 2023 Greater Exeter Economic Development Needs Assessment¹² and is summarised on page 62 of the 2024 LHNA. The key finding for Exeter is that, even under a 'Maximum+' economic growth scenario, there is still a small surplus of workers contained in the LHN. Therefore, there is no economic case for setting a housing requirement figure higher than Exeter's LHN.

- **Previous under-delivery of housing**

- 2.13 Paragraph 031 of the Housing Supply and Delivery PPG¹³ states that, where the standard method for assessing local housing need is used as the starting point for forming a planned housing requirement (as is the case with the Plan), step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing a minimum annual LHN figure. The paragraph goes on to say that under-delivery may need to be considered where a plan is being prepared part way through the proposed plan period and delivery has fallen below the emerging plan's housing requirement. The level of shortfall should be calculated from the base date of the plan and should be added to the requirements for the next five-year period.
- 2.14 The Plan is being prepared part way through its proposed plan period and the City Council has also suggested a main modification to amend the start of the

¹¹ 2024 Greater Exeter LHNA: Jobs and Workers Balance Assessment, Opinion Research Services. September 2024.

¹² Economic Development Needs Assessment (EDNA) Final Report, Hardisty Jones Associates. January 2023.

¹³ [\[ARCHIVED CONTENT\] Housing supply and delivery - GOV.UK](#), DLUHC and MHCLG. July 2019. This was extant version of the PPG when the Exeter Plan was published for Regulation 19 consultation.

plan period from 1 April 2021 to 1 April 2022. The Exeter Plan Housing Trajectory shows that between 1 April 2022 and 31 March 2025, housing supply (1,939 homes) did not fall below the emerging housing requirement (642 homes x 3 years = 1,926 homes). Therefore, it is not necessary to account for any past under-delivery when setting the housing requirement. This matter is also addressed in paragraph 3.5 of the September 2025 Exeter Five Year Housing Land Supply Statement.

- 2.15 Evidence that there has been no persistent under-delivery of housing in Exeter is also provided by Housing Delivery Test (HDT) results. Since the HDT was introduced, Exeter has comfortably passed with results of 144%, 130%, 153%, 155%, 153% and 110%. Table 1 shows that an average of 746 homes were completed annually in Exeter over the past ten years.

Table 1: Housing completions in Exeter over the past ten years

Year	Number of homes completed
2015/16	662
2016/17	778
2017/18	726
2018/19	877
2019/20	1,169
2020/21	1,038
2021/22	986
2022/23	577
2023/24	808
2024/25	554
Annual average completions	746

- **Affordable housing**

- 2.16 The City Council has considered whether the housing requirement should be set above LHN to deliver more affordable homes.
- 2.17 The 2023 NPPF does not require Local Plans to provide for all affordable homes needed in an area. Instead, paragraph 20 states that strategic policies should make sufficient provision for housing, including affordable housing. Section 5 of this topic paper sets out how the Plan will make sufficient provision for affordable housing, including by delivering approximately 64% of the city's current and future affordable housing needs through completions to date, sites with planning permission / resolution to approve planning permission at 1 April 2025 and sites allocated in Policy H2 (Housing allocations and windfalls). Additional supply will be provided on windfall sites and through work by the City Council to further increase the provision of affordable homes on allocated and windfall sites (see paragraph 5.23 of this topic paper for further details).
- 2.18 Paragraph 6.28 of the 2024 LHNA is clear that there is no basis to uplift the LHN due to any previous under-delivery of housing (which includes affordable housing), because this has already been factored into the standard method's affordability uplift.

- 2.19 In conclusion, the Exeter Plan makes sufficient provision for affordable housing in accordance with the NPPF. It is not necessary to set the housing requirement above LHN to deliver more affordable homes.

- **The housing crisis**

- 2.20 A number of Regulation 19 representations argue that the housing requirement should be set above LHN due to the national housing crisis.

- 2.21 Paragraph 16 of the 2023 NPPF requires that plans are 'positively prepared'.

- 2.22 As covered in more detail in chapter 3 of this topic paper, Policy H1 identifies a sufficient supply of land to ensure that the LHN will be met comfortably, with around a 10% headroom. Inclusion of a headroom is not required by the 2023 NPPF and will enable the delivery of more homes than necessary to meet the LHN. As such, the Plan is positively prepared and will contribute towards addressing the housing crisis.

- **Deliverability risks**

- 2.23 Finally, in setting the housing requirement, the City Council has considered potential delivery risks associated with the Plan's strategy-focus on brownfield development and optimum densities complemented with modest greenfield development.

- 2.24 Paragraph 23 of the 2023 NPPF requires that strategic policies provide a clear strategy to bring sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.

- 2.25 Evidence showing the Plan will meet this NPPF requirement is provided in the Exeter Plan Delivery Schedule, Exeter Plan Housing Trajectory, September 2025 Exeter Five Year Housing Land Supply Statement, 2025 HELAA, Local Plan Viability Assessment (2024 LPVA)¹⁴, Local Plan Viability Addendum (2025 LPVA)¹⁵, Exeter Housing Market Insights Report and Brownfield Developments in Exeter report¹⁶. This includes that:

- As set out above, the Plan includes a 10% headroom. This should ensure that the Housing Delivery Test and five-year housing land supply are met, should some sites not deliver at anticipated rates;
- Whilst the Plan focuses on brownfield development, it also provides for greenfield development. Policy H2 allocates eleven greenfield sites and enables windfall development on greenfield sites. In addition, twenty-two major greenfield sites currently have planning permission for housing. Overall, the Plan provides for development on a range of brownfield and greenfield sites, providing choice for developers and households. This will help ensure the LHN is met;
- The Plan provides for at least 16% of the housing requirement to be met on small and medium sized sites (see paragraphs 3.31 of this topic

¹⁴ Local Plan Viability Assessment, Three Dragons. November 2024.

¹⁵ Local Plan Viability Addendum, Three Dragons. September 2025.

¹⁶ Brownfield Developments in Exeter, Exeter City Council. September 2025.

paper). Again, this will provide choice for developers and thereby help ensure the LHN is met;

- In accordance with paragraph 112 of the 2023 NPPF, the Plan focuses on optimising development densities in the city centre and other locations that are well served by public transport. However, sites in other locations will likely deliver housing at comparatively lower densities (as per the housing capacities of some sites allocated in Policy H2). Overall, the Plan provides for housing to be developed at a range of densities. This will provide choice for developers and households to help ensure the LHN is met;
- There is a strong history of brownfield and apartment-led development in Exeter over the past twenty-five years. Evidence of an increasing appetite for apartment-living in Exeter is provided in the Exeter Housing Market Insights Report (page 21) and by recent and current planning applications for apartments, including at Water Lane, East Gate, Heavitree Road Police Station, Mary Arches Multi-Story and Surface Car Park, the Harlequins Shopping Centre, Exmouth Junction and The Gorge. This shift will support the drive to optimise densities and thereby help meet the LHN; and
- The 2024 LPVA and 2025 LPVA provide clear evidence that the Plan's housing strategy is viable. The achievability/viability of sites allocated in Policy H2 has also been endorsed by the HELAA Panel, a group of representatives from the housebuilding industry (see paragraph 3.1 of the 2025 HELAA).

2.26 The Exeter Plan will be reviewed and, if necessary, updated every five years to ensure that housing supply meets the LHN.

2.27 In conclusion, the evidence above demonstrates that it is reasonable and appropriate to set the Plan's housing requirement at the same level as Exeter's LHN. This is the approach taken in Policy H1.

The student housing requirement

2.28 The 2024 Greater Exeter: Student Housing Needs Assessment¹⁷ (Student HNA) provides robust evidence of the extent to which student housing needs are included in the LHN. Paragraphs 25 to 26 of the Student HNA conclude that:

- Growth of 750 students per annum is built into the annual LHN (642 homes), based on the 2008 to 2018 migration trends reflected in the household projections used in the standard method; and
- The LHN may in fact accommodate growth of more than 750 students per annum, given it is not just based on migration trends but is uplifted via the affordability ratio.

¹⁷ 2024 Greater Exeter Student Housing Needs Assessment, November 2024. Opinion Research Services.

- 2.29 Therefore, it can be concluded that Exeter's LHN includes housing for at least 750 additional students per annum over the Plan period. This equates to at least 15,000 additional student bedspaces over the twenty-year Plan period.
- 2.30 A representation made at Regulation 19 stage¹⁸ argues that the Student HNA's conclusions are outdated (and thereby wrong) because they are based on student population data from 2021/22, and also because the data differs significantly from another set of data that appeared in a local newspaper article in 2022.
- 2.31 It is incorrect that the Student HNA's conclusions are based on data from 2021/22. As referred to in paragraph 2.28 above and explained in paragraph 26 of the Student HNA, the conclusions are based on the 2008 to 2018 migration trends that are reflected in the household projections used in the standard method, which is the basis of Exeter's LHN. As such, the conclusions are fully compatible with the LHN.
- 2.32 It is also incorrect that the Student HNA's conclusions are wrong because the population data on which they are based differs from the population data that appeared in the local newspaper article. Both sets of data were sourced from The University of Exeter. The University has advised the City Council that the newspaper article data did not reflect the number of University students needing accommodation. This is because:
- The newspaper data was a count of 'filled' student places on every course. Therefore, students registered on more than one course were double+ counted in the data; and
 - The newspaper data not only included all filled places on full-time courses, but also all filled places on part-time courses during the academic year. Part time students are likely to live at home and not require accommodation.
- 2.33 In contrast, the University of Exeter has confirmed that the full-time equivalent student population data used in the Student HNA provides a far more accurate indication of the number of students needing accommodation at any one point in the academic year. In conclusion, the Student HNA uses an appropriate data source to robustly determine the extent to which student housing needs are included in Exeter's LHN.

Designated neighbourhood area

- 2.34 Paragraph 67 of the 2023 NPPF states that, within the overall housing requirement, strategic policies should set out a housing requirement for designated neighbourhood areas (DNAs) which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 2.35 There is one DNA in the Exeter covering the former St James ward. The DNA was established in 2011 and is the subject of the Exeter St James Neighbourhood Plan¹⁹, prepared by the Exeter St James Forum and adopted by the City Council in March 2013. No other DNAs are in the process of being established and no other Neighbourhood Plans are currently being prepared.

¹⁸ Representation to Policy H10: Purpose build student accommodation made by Taylor Wimpey.

¹⁹ St James Neighbourhood Plan, Exeter St James Forum. March 2013.

2.36 The Exeter St James Neighbourhood Plan does not allocate land for housing development and is more than ten years old. Additionally, the Exeter St James Forum has been wound down. As such, the Plan does not identify a housing requirement for the Exeter St James DNA. If it is considered necessary to set a housing requirement for the Exeter St James DNA, the City Council suggests that it should be based on the following calculation:

- a. Total housing capacity of site allocations proposed in Policy H2 that are within the DNA (Land at Exeter Squash Club, Prince of Wales Road, site ref. 26; Land and buildings at Victoria Street, site ref. 150; and 12-31 Sidwell Street, site ref. 51) = **140 homes**

Plus

- b. A windfall allowance for the DNA, calculated in line with the Exeter HMA Housing and Economic Land Availability Assessment (HELAA) Methodology²⁰ = **90 homes**

Equals

- c. **Exeter St James DNA housing requirement: 230 homes**, to be delivered during the remainder of the Plan period.

²⁰ HELAA Methodology, East Devon District Council, Exeter City Council, Mid Devon District Council and Dartmoor National Park Authority. May 2021.

3. Exeter Plan housing supply

Housing supply period

- 3.1 At paragraph 22, the 2023 NPPF states that strategic policies should look ahead over a minimum fifteen-year period from adoption, to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure. In addition, paragraph 69 states that:

“Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption, and
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”

- 3.2 The Submission Plan covers the period 2021 to 2041. The anticipated date of adoption is (shortly before) 1 April 2027, which does not provide the requisite fifteen years post-adoption. The City Council has therefore suggested main modifications to amend the Plan period to 2022 to 2042 and to amend the housing supply calculations informing Policies H1 and H2 so that they cover fifteen years post-adoption.

Counting completions

- 3.3 The Plan’s housing supply has been calculated in accordance with the Housing Supply and Delivery PPG²¹. The supply figures in Policies H1 and H2 are net and include new build dwellings, conversions, changes of use and demolitions and redevelopments. No allowance for empty homes is made in the completions data.

- **Purpose built student accommodation (PBSA)**

- 3.4 Paragraph 034 of the Housing Supply and Delivery PPG 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 in principle count towards contributing to an authority’s housing land supply based on:

- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use): and/or*
- *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-build student

²¹ [\[ARCHIVED CONTENT\] Housing supply and delivery - GOV.UK](#), DLUHC and MHCLG. July 2019.

accommodation may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.”

- 3.5 As set out in paragraph 2.29 of this topic paper, the Plan’s housing requirement includes housing for at least 15,000 additional students. In accordance with the Housing Supply and Delivery PPG, the Plan is therefore justified in counting at least 15,000 bedspaces of purpose-built student accommodation (PBSA) as housing completions based on the extent to which their provision allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 In accordance with the Housing Supply and Delivery PPG, the Plan counts PBSA completions as follows:
- Every studio flat is counted as one home; and
 - Every 2.5 bedspaces in cluster flats or communal halls of residence completed between 2022/23 and 2024/25 are counted as one home, reflecting 2011 census data on the average number of students living in student-only households; and
 - Every 2.4 bedspaces in cluster flats or communal halls of residence that are anticipated to be completed from 2025/26 onwards are counted as one home. This reflects 2021 census data published in December 2024 on the average number of students living in student-only households (also referred to in paragraph 10 of the 2024 Housing Delivery Test Measurement Rule Book²²).
- 3.7 Should more than 15,000 bedspaces be provided during the Plan period, the City Council will count those additional bedspaces based on the amount of accommodation that they release in the wider market by allowing existing properties to return to general residential use.
- **Co-living housing**
- 3.8 Paragraph 6.33 of the Plan states that co-living housing generally provides accommodation for single young professionals. Co-living bedspaces can be provided in studio flats or cluster flats.
- 3.9 The Housing Supply and Delivery PPG is clear that studio flats for graduates and young professionals should be counted on a 1:1 basis (see paragraph 3.4 above). This is supported by an email to the City Council from DELTA, the MHCLG’s online data collection service, which confirms that co-living

²² Housing Delivery Test Measurement Rulebook, MHCLG etc. December 2024.

studio flats are counted on a 1:1 basis in the Housing Flows Reconciliation return (which is the measurement of housing supply used in the Housing Delivery Test). The email is shown at appendix A.

3.10 In accordance with the Housing Supply and Delivery PPG and email from DELTA, the Plan counts co-living housing completions as follows:

- Every studio flat is counted as one home;
- Every 1.8 bedspaces in co-living cluster flats completed between 2022/23 and 2024/25 are counted as one home. This reflects 2011 census data on the average number of adults in all households; and
- Every 1.9 bedspaces in co-living cluster flats that are anticipated to be completed from 2025/26 onwards are counted as one home. This reflects 2021 census data published in December 2024 on the average number of adults in all households.
- **Homes for older people and supported housing**

3.11 Paragraph 035 of the Housing Supply and Delivery PPG states that:

“Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market.”

3.12 Paragraph 016a of the Housing for Older and Disabled People PPG²³ states that

“Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using published Census data.”

3.13 As such, the Plan counts older peoples’ and supported housing in Exeter’s housing supply as follows:

- Every self-contained home (for example, an apartment provided in an extra care or assisted living development, where residents have access to care and supplementary communal facilities) is counted as one home;
- Every 1.8 bedspaces in residential institutions for older people (e.g. care and nursing homes) completed between 2022/23 and 2024/25 are counted as one home. This reflects 2011 census data on the average number of adults in all households; and
- Every 1.9 bedspaces in residential institutions for older people anticipated to be completed from 2025/26 onwards are counted as one home. This reflects 2021 census data published in December 2024 on the average number of adults in all households.

²³ [\[ARCHIVED CONTENT\] Housing for older and disabled people - GOV.UK](#), DLUHC and MHCLG. June 2019.

- 3.14 The housing supply figures in Policies H1 and H2 of the Submission Plan were calculated before the 2021 census data on average household sizes was published (December 2024). The City Council has suggested main modifications to Policies H1 and H2 and additional modifications to paragraphs 6.37, 6.48, 6.53 and 6.63 and the housing trajectory summary on pages 166 and 167 of the Plan, to ensure (amongst other reasons) that the Plan reflects the new census data (see also paragraph 4.5 of this topic paper).

Sources of housing supply

- 3.15 Policy H1 of the Plan identifies four sources of housing supply. These are: completions from 2021/22 to 2023/24; sites with planning permission / resolution to approve planning permission at 1 April 2024; site allocations; and windfall sites. The City Council has suggested main modifications to Policy H1 to reflect:
- A suggested main modification to amend the Plan period to 2022-2042, which will remove data for 2021/22 from the completions figure;
 - Completions in 2024/25;
 - Planning permissions granted, and resolutions to approve planning permission made, in 2024/25;
 - Updated assessments of the housing capacities of some site allocations in Policy H2, taken from the 2025 HELAA; and
 - An update of the windfall allowance, taken from the September 2025 Five Year Housing Land Supply Statement.
- 3.16 The data in this section of the topic paper reflects the suggested main modifications. It also aligns with the Exeter Plan Housing Trajectory (Housing Trajectory), which sets out a clear trajectory for anticipated housing supply over the Plan period, the September 2025 Exeter Five Year Housing Land Supply Statement and the Exeter Plan Delivery Schedule which summarises key delivery information for each site allocation.
- **Completions from 2022/23 to 2024/25**
- 3.17 Annual housing completions from 2022/23 to 2024/25 are shown in table 1 above and appendix A of the Housing Trajectory. They amount to 1,939 homes.
- **Existing planning consents**
- 3.18 Appendix B of the Housing Trajectory lists all sites with planning permission or a resolution to approve planning permission at 1 April 2025. Permissions have been counted in the supply figures if they meet the 2023 NPPF glossary's definitions of 'deliverable' or 'developable'. Evidence demonstrating the deliverability of sites with planning permission is provided in appendices C and E of the September 2025 Five Year Housing Land Supply Statement. All other permissions are considered developable unless there is clear evidence

to demonstrate that they are not. Where that is the case, details are provided in the final column of appendix B of the Housing Trajectory (see site refs. MSO03(S), MSO04, MSD48, SSOD07, SSOD14, SSOD15, SSOD16, SSOD18, SSOD19, SSOD20 and SSOD23).

- 3.19 In summary, the methodology for including sites with permission in the supply figures accords with the 2023 NPPF and is informed by the Exeter HMA HELAA Methodology and delivery evidence recently provided by developers / agents / landowners of major sites with permission.
- 3.20 The Housing Trajectory identifies a total supply of 5,416 homes from sites with planning permission or a resolution to approve planning permission at 1 April 2025. It is anticipated that one site with a resolution to approve planning permission will continue to deliver homes beyond the end of the Plan period (see site ref. MSO06(S) in appendix B of the Housing Trajectory).

- **Site allocations**

- 3.21 Appendix D of the Housing Trajectory lists all sites allocated for housing in Policy H2 of the Plan. Where the City Council has suggested a main modification to amend the housing capacity of a site allocation, it is reflected in the Housing Trajectory²⁴.
- 3.22 All site allocations in Policy H2 (the City Council's 'suggested modifications' version) meet the 2023 NPPF glossary's definitions of deliverable or developable. Five allocations (site refs. 15/145, 104, 18, 95 and 153 in the Housing Trajectory) are deliverable, as demonstrated in appendix G of the September 2025 Five Year Housing Land Supply Statement. All other allocations are developable, as demonstrated in the 2025 HELAA.
- 3.23 The Housing Trajectory identifies a total supply of 4,766 homes from site allocations. It is anticipated that a further c.100 homes will be delivered on site allocations beyond the end of the Plan period (see site refs. 15/117 and 15/130).
- 3.24 Policy H2 has evolved during preparation of the Plan. Section 4 of this topic paper explains the evolution of the Policy.

- **Windfall allowance**

- 3.25 Appendix C of the Housing Trajectory identifies a windfall contribution of 2,039 homes over the Plan period. The data is drawn from appendix H of the September 2025 Five Year Housing Land Supply Statement: paragraphs 4.16 to 4.23 of that document explain the robust methodology behind the data. In summary, the windfall allowance has been calculated in accordance with paragraph 72 of the 2023 NPPF, having regard to the HELAA, historic windfall delivery rates and expected future trends.
- 3.26 The Plan specifically supports opportunities for windfall development in Policy H2, which will enable the windfall allowance to be met. In addition, the City

²⁴ The City Council has suggested main modifications to Policy H2, comprising amended capacities for site refs. 15, 145, 146, 104, 163, 64, 91, 18, 153, 165, 106, 158 and 108 and the deletion of site refs. 72, 60 and 110.

Council has suggested a minor modification to the supporting text of Policy H7 (Custom and self-build housing) which will enable windfall developments of 100% custom and self-build housing, subject to compliance with other relevant policies in the Plan.

Overall housing supply

- 3.27 Appendix A of the Housing Trajectory anticipates that the four sources of supply will deliver 14,119 homes over the Plan period. This exceeds the housing requirement of 12,840 homes by 1,279 homes, giving a healthy headroom of 10% to provide choice for developers. It will also ensure that the Housing Delivery Test and five-year housing land supply are met, should some sites not deliver at anticipated rates. There is no need to identify additional site allocations to meet the housing requirement.

Lead-in times and build rates

- 3.28 The housing supply shown in the Housing Trajectory is based on the following sources of information about lead-in times (the time between a planning application being made and the first year of housing completions) and build rates:
- Correspondence over the past six months with developers, landowners and agents of major sites, on a site-by-site basis. Details are provided in appendices C, E and G of the September 2025 Exeter Five Year Housing Land Supply Statement;
 - Intelligence provided by planning officers working on projects associated with sites;
 - A review of the status of planning applications and permissions;
 - Appendix 2 of the 2021 HELAA HMA Methodology, which includes assumptions about development lead-in times and build rates that have been endorsed by the HELAA Panel. The basic assumption is that each sales outlet will complete fifty homes per year on average, but that completions in years one to five will be constrained by factors currently affecting the housing market (e.g. high construction costs, labour shortages). Recent housing completions data and information provided to the City Council by developers, landowners and agents indicates that the model's constrained delivery assumptions for years one to five are on the conservative side. This is why the HELAA HMA Methodology is not the only source of information considered by the City Council to determine lead-in times and build rates;
- 3.29 The City Council has sense-checked the above information against case studies in Lichfield's latest 'Start to Finish' report²⁵. The report looks at the lead-in times and build rates achieved on a range of recent/ ongoing large and smaller scale housing developments in the UK. In summary, the site-specific lead-in times and build rates in the Housing Trajectory are broadly compatible with the report's findings.

²⁵ Start to Finish: How quickly do large-scale housing sites deliver? Third Edition. Lichfields. September 2024.

Small and medium sized sites

- 3.30 Paragraph 70 of the 2023 NPPF recognises the role that small and medium sized sites can make towards ensuring a reliable housing supply. Accordingly, it sets requirements for local planning authorities to ensure a good mix of site sizes. The first of these is that the development plan and brownfield land register should identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare.
- 3.31 Table 2 demonstrates that the Plan exceeds this requirement: sites allocated in Policy H2, small sites with planning permission at 1 April 2025 and small windfall sites will supply just over 2,000 homes over the Plan period, which equates to around 16% of the housing requirement (12,840 homes). In addition, housing completions between 2022/23 and 2024/25 will have included sites measuring no larger than one hectare.

Table 2: Anticipated housing supply on small and medium sites (excluding completions from 2022/23 to 2024/25)

Site	Capacity	Gross site area (hectares)
Water Lane / 61 and 62 Haven Road	34	0.26
Water Lane / Canal Office and Sea Cadets, Haven Road	20	0.15
East Gate / Civic Centre, Paris Street	106	0.68
East Gate / Manor Court	52	0.42
East Gate / The Pyramids, John Hannam House and Eaton House, Eaton Drive	92	0.98
East Gate / Clarendon House, Western Way	202	0.25
Mary Arches multi-storey and surface car park, Mary Arches Street	246	0.46
Rougemont Switching Centre, Queens Road	86	0.48
Land at Exeter Squash Club, Prince of Wales Road	48	0.23
Land and buildings at Victoria Street	47	0.26
12-31 Sidwell Street	45	0.37
Gipsy Hill Hotel, Gipsy Hill Lane	41	0.34
Unit 1 Nightclub, Summerland Street	28	0.08
Land behind 66 Chudleigh Road	27	0.68
Chestnut Avenue	24	0.23
Land at Matford Lane	27	0.44
East of Pinn Lane	12	0.58

Hessary, Hollow Lane	18	0.73
Fever & Boutique, 12 Mary Arches Street	15	0.07
Land south of Gipsy Hill Lane	14	0.58
Garages at Lower Wear Road	12	0.23
Newbery Car Breakers, Redhills	8	0.31
Lancelot Road	7	0.13
Land rear of Beacon Lane shops	6	0.10
Land at Taunton Close	5	0.10
91-97 Wonford Street	5	0.09
Small windfall sites	699	-
Small sites with planning permission at 1 April 2025	100	-
Total	2,026	

3.32 In addition:

- Policy H2 supports medium and small-scale housing development by enabling windfall development; and
- The City Council has suggested a modification to the supporting text of Policy H7 (Custom and self-build housing), to clarify that proposals for 100% custom and self-build housing will be supported subject to compliance with relevant policies in the Plan. It is likely such developments will be small in scale.

Five-year housing land supply

- 3.33 The September 2025 Exeter Five Year Housing Land Supply Statement (September 2025 Statement) confirms a five-year housing land supply from the intended point of adoption of the Plan (1 April 2027), in accordance with paragraph 69 and footnote 35 of the 2023 NPPF.
- 3.34 The five-year housing land requirement includes a 10% buffer, because the City Council is seeking to confirm the existence of a five-year supply through examination of the Plan. The five-year requirement does not consider any past under-delivery of housing, nor is it necessary to do so, for the reasons set out in 2.14 to 2.15 of this topic paper.
- 3.35 The five-year housing land supply includes deliverable sites with planning permission/resolution to approve planning permission at 1 April 2025 and deliverable site allocations from Policy H2. Clear evidence supporting inclusion of these sites in the supply is provided in appendices C, E and G of the September 2025 Statement.
- 3.36 Table 3 summarises the conclusion of the September 2025 Statement.

Table 3: September 2025 five-year housing land supply position

Minimum five -year housing requirement (642 x 5)	3,210
Plus 10% buffer	3,531
Five-year supply of deliverable sites, from 1 April 2027	3,812
Housing land supply	Five years and 4.9 months

4. Housing allocations

- 4.1 Policy H2 allocates sites for housing or mixed-use development including housing. This section of the topic paper explains how the list of sites, and the housing capacity of some sites, have evolved during preparation of the Plan.

Sites removed between Outline Draft and Submission Plan Stages

- 4.2 Nine sites have been removed from Policy H2 over the course of Plan preparation:
- Marsh Barton, North Gate, West Gate and Sandy Gate were allocated in the Outline Plan to reflect their inclusion in the Liveable Exeter Prospectus. The sites have since been removed as allocations due to development constraints, limited site promotion and multiple land ownerships. The Plan now identifies North Gate and the northern part of Marsh Barton as regeneration opportunity areas under Policy H3, but they are not relied upon to deliver any of the housing requirement;
 - Land to the north, south and west of the Met Office, Land at Cowley Bridge Road, Yeomans Gardens, Newcourt Road, Topsham and 99 Howell Road have been removed as allocations because they have either been developed or have planning permission for housing. No sites with planning permission for housing are allocated in the Plan;
 - Former overflow car park, Tesco, Russell Way has been removed as an allocation because it has been developed to as a drive-through restaurant.

Sites proposed for removal via suggested main modifications to the Plan

- 4.3 The City Council has suggested that three site allocations are removed from Policy H2, via main modifications to the Plan:
- Belle Isle Depot, Belle Isle Drive: The Environment Agency (EA) has undertaken additional work to assess flood risk at the site. In light of that work, the EA has advised the City Council that the site would struggle to pass the exception test and therefore should not be allocated (see also the 2025 Exeter HELAA and Statement of Common Ground between Exeter City Council and the EA²⁶);
 - Land at Hamlin Lane: Through the HELAA process, the City Council has identified additional constraints which mean the site is too small to warrant being allocated;
 - 88 Honiton Road: At Regulation 19 stage, the landowner advised the City Council that the site is no longer available for housing development.

²⁶ Exeter Plan SoCG, Exeter City Council and Environment Agency. Exeter City Council, May 2025.

Sites added since the Outline Draft Plan

4.4 Eighteen sites have been added to Policy H2 since Outline Draft Plan stage:

- Heavitree Road Police Station: At Outline and Full Draft Plan stages the site formed part of the East Gate allocation. However, in the Publication Plan the site was identified as a standalone allocation. This is because the site lies some distance from the bulk of East Gate;
- Mary Arches Multi-Storey and Surface Car Park: At Outline and Full Draft Plan stages the site formed part of the North Gate allocation. At Publication Plan stage, the North Gate allocation was removed (see above) and the Car Park site was added as a standalone allocation. This reflects progress made towards housing delivery on the site, including a formal City Council decision to sell the Car Park for housing regeneration, a HELAA assessment that it the Car Park is suitable, available and achievable for housing development and a current planning application for housing development on the site;
- Exe Bridges Retail Park: At Outline Draft Plan stage the site formed part of the West Gate allocation. At Full Draft Plan stage, the West Gate allocation was removed (see above) and Exe Bridges Retail Park was added as a standalone allocation. This reflects a HELAA assessment that Exe Bridges Retail Park is suitable, available and achievable for housing development;
- Whipton Community Hospital, Rougemont Switching Centre, Land and buildings at Victoria Street, Land east of Newcourt Road, Land at Topsham Golf Academy, Clifford Close, Gipsy Hill Hotel, Unit 1 Nightclub, Hessary, Newbery Car Breakers, Lancelot Road, Land rear of Beacon Lane shops, Land at Taunton Close and 91-97 Wonford Street were added as allocations between Outline Draft and Publication Plan stages because. This reflects HELAA assessments that the sites are suitable, available and achievable for housing development.

Capacity changes

4.5 Over the course of Plan preparation, the housing capacities of several sites have evolved. Reasons for this include amendments made to site boundaries (for example, arising from updated land availability information) and the need to consider revised density and build rate assumptions, Census data on household sizes, new planning permissions or applications for housing, site-specific information and advice provided by Development Management officers, landowners, agents and developers.

4.6 The City Council has suggested the following main modifications to site capacities in Policy H2:

- Water Lane: Amendment from 1,861 homes to (approximately) 1,652 homes. This will ensure the capacity reflects total homes proposed by planning applications 22/1145/FUL and 23/1007/OUT, and the number of homes the City Council expects the site to deliver over the Plan period based on revised build rate assumptions shown in the Housing Trajectory. The City Council anticipates that a further c.655 homes will be delivered

after the end of the Plan period and an additional modification is suggested to reflect this.

- East Gate: Amendment from 609 homes to (approximately) 691 homes. This will ensure the capacity reflects total homes proposed by planning application 25/1082/FUL for Clarendon House.
- Red Cow: Amendment from 442 homes to (approximately) 393 homes. This will ensure the capacity reflects the revised assessment of land available for development contained in the 2025 HELAA.
- Heavitree Road Police Station: Amendment from 350 homes to (approximately) 813 homes. This will ensure the capacity reflects total homes proposed by planning application 25/0676/FUL.
- Mary Arches Multi-Storey and Surface Car Park: Amendment from 154 homes to (approximately) 246 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.
- Whipton Community Hospital: Amendment from 110 homes to (approximately) 129 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.
- Land at Newcourt Road, Topsham: Amendment from 69 homes to (approximately) 51 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.
- Land adjoining Silverlands: Amendment from 67 homes to (approximately) 55 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management and developer advice.
- Land to the east of Newcourt Road 2, Topsham: Amendment from 45 homes to (approximately) 27 homes. This will ensure the capacity reflects total homes proposed by planning application 24/1425/FUL.
- Gipsy Hill Hotel: Amendment from 28 homes to (approximately) 41 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.
- East of Pinn Lane: Amendment from 24 homes to (approximately) 12 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.
- Land at Matford Land 2: Amendment from 21 homes to (approximately) 27 homes. This will ensure the capacity reflects a revised site assessment contained in the 2025 HELAA, informed by Development Management advice.

- Hessary, Hollow Lane: Amendment from 17 homes to (approximately) 18 homes. This will ensure the capacity reflects the revised site assessment of land available for development contained in the 2025 HELAA.

5. Affordable housing

National policy context

5.1 The 2023 NPPF states that:

- Strategic policies should make sufficient provision for housing, including affordable housing (paragraph 20);
- Those who require affordable housing are one of the different groups in the community whose housing needs should be assessed and reflected in planning policies (paragraph 63);
- Where a need for affordable housing is identified, planning policies should specify the type of affordable housing requirement (with reference to annex 2 of the 2023 NPPF) and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities (paragraph 64); and
- Provision of affordable housing should not be sought for residential developments that are not major in scale (defined as developments of ten or more homes, or measuring 0.5 hectares or more). Also, to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount (paragraph 65).

5.2 Annex 2 of the 2023 NPPF includes a definition of affordable housing.

5.3 The PPG on Planning Obligations²⁷ advises that:

- Evidence of affordable housing need should inform Plans alongside a proportionate assessment of viability that considers all relevant policies, and local and national standards including the cost implications of the Community Infrastructure Levy and planning obligations. (paragraph 005); and
- Plans should set out the contributions expected from development towards affordable housing (paragraph 010).

5.4 The PPG on First Homes²⁸ advises that:

- First Homes must be discounted by a minimum of 30% against market value (paragraph 002); and
- Local authorities may increase the discount to either 40% or 50% if they can demonstrate a need for this through a housing needs assessment (paragraph 004).

²⁷ [\[ARCHIVED CONTENT\] Planning obligations - GOV.UK](#). DLUHC and HMCLG. September 2019.

²⁸ [\[ARCHIVED CONTENT\] First Homes - GOV.UK](#). DLUHC and MHCLG. December 2021.

5.5 The PPG on Build to Rent²⁹ advises that:

- Affordable housing on build to rent schemes should be provided by default as affordable private rent, managed collectively with the private market rent units by a single landlord (paragraph 002);
- 20% is generally a suitable benchmark level for the affordable private rent homes to be provided and maintained in perpetuity in any build to rent schemes (paragraph 002); and
- The affordable private rent homes should have a minimum rent discount of 20% relative to local market rents.

5.6 The Plan adheres to the NPPF and PPG requirements. It:

- Makes sufficient provision for affordable housing, taking into account the need for affordable housing evidenced by the 2024 LHNA, viability considerations evidenced by the 2024 LPVA and other sources of provision;
- Sets clear affordable housing targets and tenure splits for major residential developments, based on the conclusions of the 2024 LHNA and 2025 LPVA;
- Requires affordable housing to be provided on-site unless there is robust justification for alternative provision;
- Allows for consideration of the Vacant Building Credit to support brownfield development; and
- Requires a minimum rent discount of 20% for affordable private homes secured on Build to rent schemes.

5.7 The City Council has suggested a main modification to Policy H4 (Affordable housing) to ensure compliance with the PPG. Further details are provided in paragraph 5.16 of this topic paper.

Supporting evidence

- **2024 Exeter Local Housing Needs Assessment (2024 LHNA)**

5.8 Chapter 5 of the 2024 LHNA provides a robust assessment of the need for affordable housing in the city over the twenty-year Plan period³⁰.

²⁹ [\[ARCHIVED CONTENT\] Build to rent - GOV.UK](#), DLUHC and MHCLG. September 2018.

³⁰ The City Council has suggested a major modification to amend the Plan period to 2022-2042, whereas the 2024 LHNA covers the period 2021-2041. It is not considered that moving the Plan period forwards by one year will make a significant difference to the 2024 LHNA's affordable housing conclusions.

- 5.9 Paragraph 5.65 and figure 42 of the 2024 LHNA identify an overall affordable housing need from 3,821 households in Exeter over the Plan period. This comprises all households unable to afford to rent or own market housing (2,044 households) and all households who aspire to homeownership, cannot afford to buy, but have a realistic prospect of being able to access an affordable homeownership product (1,777 households). As such, the assessment identifies the need for affordable housing as defined in annex 2 of the 2023 NPPF.
- 5.10 In chapter 6 of the 2024 LHNA, the overall affordable housing need is aligned with Exeter's LHN / housing requirement so that the latter can be separated into requirements for market and affordable housing. Figures 48 and 49 of the 2024 LHNA (page 67) show that:
- Of Exeter's LHN / housing requirement (12,840 homes), 4,155 households (32.4%) require affordable housing; and
 - 37.2% of those 4,155 households can only afford social rents and 13.5% can afford affordable rents.
- 5.11 Figures 49 and 51 of the 2024 LHNA (pages 67 and 69) show that of the 4,155 households that require affordable housing, 5.7% can afford a First Home sold with a 30% discount from market price whereas 31.8% can afford a First Home sold with a 40% discount from market price.
- **2024 Local Plan Viability Assessment**
- 5.12 Paragraphs 3.22 to 3.24 of the 2024 LPVA explain that the following proportions of affordable housing have been tested to inform the Plan's affordable housing policy requirements. The proportions draw on the conclusions of the 2024 LHNA (see paragraphs 4.10 and 4.11 above) and Three Dragons' evidence indicating potential viability challenges with high density and brownfield development:
- 'For sale' standard residential on greenfield sites: 35% affordable housing with a tenure mix of 50% social rent and 50% shared ownership;
 - 'For sale' standard residential brownfield sites: 15% affordable housing with a tenure mix of 50% social rent and 50% shared ownership; and
 - Build to rent (including co-living) and purpose-built student accommodation: 20% affordable housing with a tenure mix of 100% discount market rent (at 20% discount from market rent).
- 5.13 Paragraphs 5.9 to 5.11 of the 2024 LPVA conclude that most typologies representative of development proposed for central Exeter sites, and all typologies representative of development proposed for other locations in Exeter, are viable with the affordable housing levels were tested.

The Plan's affordable housing targets and tenure splits

- 5.14 The 15% brownfield site / 35% greenfield site affordable housing targets in Policy H4 are informed by:

- The 2024 LHNA's finding that 4,155 households (32.4% of Exeter's local housing need) require affordable housing (see paragraph 5.10 above);
 - Consideration that the Plan can only seek affordable housing from major residential development, indicating that the affordable housing target should be higher than 32.4% where possible; and
 - The 2024 LPVA's conclusions that 35% affordable housing is viable for major greenfield residential developments and 15% affordable housing is viable for major brownfield residential developments (see paragraphs 5.12 and 5.13 above).
- 5.15 The 50% social rent / 50% affordable home ownership tenure split in Policy H4 is informed by:
- The 2024 LHNA's finding that approximately 50% of households in need of affordable housing over the Plan period (2,044 of 3,821) will be unable to afford to rent or own market housing (see paragraph 5.9 above);
 - The 2024 LHNA's finding that, in terms of affordable housing for rent, the product most needed in Exeter is social rent (see paragraph 5.10 above). As Registered Providers tend to prefer to manage only one type of affordable rental product per housing development, it is reasonable that the Exeter Plan should prioritise the delivery of social rent above affordable rent; and
 - The 2024 LPVA's conclusion that a 50% split between social rent and affordable home ownership is viable on both brownfield and greenfield sites (see paragraphs 4.12 and 4.13 above).
- 5.16 Criterion b of Policy H4 of the Submission Plan states that, to meet local needs, at least 30% of any First Homes delivered to meet the affordable home ownership requirement should be sold at a discount from market prices of at least 50%. The City Council has suggested a main modification to amend criterion b so it reads "To meet local needs, at least 30% of any First Homes delivered to meet the affordable home ownership requirement should be sold at a discount from market prices of at least 40%." This will ensure criterion b aligns with the findings of the 2024 LHNA set out in paragraph 5.11 above.
- 5.17 The 20% affordable housing (affordable private rent) target in Policy H5 (Build to rent) is informed by:
- Advice in the Build to Rent PPG that 20% is generally a suitable benchmark level for the amount of affordable private rent in build to rent schemes; and
 - The 2024 LPVA's conclusions that a 20% target is a viable in Exeter (see paragraph 5.12 above).

- 5.18 Policies H4 and H5 provide a starting point to negotiate affordable housing provision. Paragraph 6.20 and 6.26 of the Plan's supporting text clearly set out the process by which the City Council will consider a departure from the percentages in the policies. It is unnecessary to reiterate the supporting text, or state that the percentages are starting points for negotiation, in the policies themselves.
- 5.19 Whilst the 2024 LPVA concludes that purpose-built student accommodation (PBSA) in Exeter can viably include 20% affordable housing, Policy H10 (PBSA) does not set a target for the provision of affordable PBSA. This is because the City Council and University of Exeter do not consider it feasible to manage the allocation of students to affordable PBSA in a way that complies with data protection legislation. However, to encourage provision of more affordable PBSA, paragraph 6.61 of the Plan's supporting text states that a range of PBSA should come forward which offers choice within the market to a variety of budgets. The City Council will work with PBSA providers to encourage provision of more affordable accommodation (e.g. cluster flats and bedspaces with shared facilities) within PBSA developments.

Affordable housing supply over the Plan period

- 5.20 In accordance with the 2023 NPPF, the Plan makes sufficient provision for affordable housing, taking account of viability considerations, other sources of provision and the NPPF's requirement to meet the housing needs of other community groups.
- 5.21 The City Council estimates that the Plan will deliver approximately 2,460 affordable homes between 2022 and 2042. This accounts for approximately 59% of the Plan's affordable housing requirement (4,155 homes) and 64% of Exeter's affordable housing need (3,821 homes). The supply comes from:
- 544 affordable homes completed between 2022/23 and 2024/25 (figures taken from the City Council's monitoring of housing completions);
 - Approximately 1,190 affordable homes with planning permission / resolution to approve planning permission at 1 April 2025; and
 - Between approximately 525 and 920 affordable homes (average of 720) on sites allocated in Policy H2. It is not yet possible to determine a precise figure, because in most cases the City Council does not know what type of housing each allocation will provide. The range has been estimated considering that some sites will not deliver any affordable housing (for example, those developed for PBSA), some will be required to deliver 15% or 35% affordable housing under Policy H4 and some will be required deliver 20% affordable housing under Policy H5.
- 5.22 These figures do not include affordable housing provision on windfall sites. The Housing Trajectory includes an allowance for 1,299 windfall homes on major sites and a further 699 windfall homes on small sites. It is reasonable to expect that a proportion of windfall completions will be affordable homes, although it is not realistic to predict how many with any accuracy.

5.23 To further increase the provision of affordable homes over the Plan period, the City Council will work to maximise delivery of affordable homes on site allocations and windfall sites as follows:

- By securing financial contributions for affordable housing:
 - Up to approximately £2,795,890 in affordable housing financial contributions have recently been secured or are currently being negotiated by the City Council; and
 - Paragraph 6.19 of the supporting text to Policy H4 explains that, where the Policy's target results in an affordable housing requirement that does not equate to a whole number of homes, the City Council will seek a financial contribution to provide part of an affordable housing. The City Council has suggested an additional modification to paragraph 6.26 of the Plan's supporting text so that financial contributions can also be sought from Build to rent development, via Policy H5.
 - The City Council will spend all affordable housing financial contributions on the provision of affordable housing in the Exeter. Contributions may be used (e.g.) to buy additional affordable homes from developers, or to help fund affordable housing development by the City Council;
- Meeting the City Council's Council Housing Strategy³¹ commitment to deliver five hundred new Council-owned/developed affordable homes in the city by 2030. A proportion of the homes are already under construction or will be delivered on Council-owned sites allocated in Policy H2, demonstrating a commitment to deliver;
- Working proactively with Homes England to leverage additional funding for affordable housing;
- Working proactively with Registered Providers, including to secure development of sites for 100% affordable housing. Examples of successful proactive work to date include with LiveWest on its 100% affordable housing schemes at the Former Exwick Middle School, Former Foxhayes First School and Former St Lukes School sites (134 affordable homes delivered) and with Places for People on its 100% affordable housing schemes at the Land at Ikea Way and Exmouth Junction sites (273 affordable homes currently under construction);
- Working proactively with Devon County Council to link affordable housing with extra care delivery at Water Lane and the Clifton Hill Leisure Centre site, which the City Council has agreed to sell to an affordable housing extra care developer; and

³¹ Exeter Council Housing Strategy 2023-2027, Exeter City Council. April 2024.

- Working with the Devon and Torbay Combined County Authority (CCA) on a Housing Delivery Plan for the region to take forward the recommendations of the Report of the Devon Housing Commission³². The Delivery Plan will be part of the CAA's proactive approach to, amongst other things, help address housing affordability issues in the region.

Conclusion

- 5.24 The information above shows that the Exeter Plan makes sufficient provision for affordable housing in the city over the Plan period, taking into account local affordable housing needs, viability considerations, and estimated affordable housing supply from a range of sources.

³² [2024EI047-Devon-Housing-Commission-Final-Report-v8.pdf](#)

6. Purpose built student accommodation

The student housing requirement

- 6.1 As set out in paragraph 2.28 and 2.29 of this topic paper, the Student HNA robustly demonstrates that Exeter's annual LHN includes housing for at least 750 additional students per annum over the Plan period. This equates to at least 15,000 additional student bedspaces over a twenty-year Plan period.

The supply of purpose-built student accommodation

- 6.2 Since an increase of at least 15,000 students is included in the Plan's housing requirement, the City Council can count at least 15,000 additional student bedspaces towards Exeter's housing supply. As set out in paragraphs 3.4 to 3.7 of this topic paper, the bedspaces can be counted based on the extent to which they allow general market housing to remain in such use, rather than being converted for use as student accommodation. It will only be necessary to count student accommodation based on the amount of accommodation that it releases in the wider housing market (by allowing existing properties to return to general residential use) if the supply of student bedspaces exceeds (at least) 15,000 over the Plan period.
- 6.3 Table 4 shows that 2,851 bedspaces of purpose-built student accommodation (PBSA) are accounted for in the Housing Trajectory. This is far fewer than 15,000 bedspaces and means there is significant leeway to permit additional PBSA bedspaces during the Plan period whilst also supplying homes to meet other local needs. The supply of PBSA accounted for in the Trajectory comprises 383 bedspaces already been completed, 1,772 bedspaces that are expected to be delivered on sites with planning permission at 1 April 2025 (see site refs. MSD44(S), MSD45, MSD46 and MSD47 in appendix B of the Housing Trajectory) and 696 bedspaces that are expected to be delivered on site allocations (see site ref. 145/103 in appendix G of the September 2025 Exeter Five Year Housing Land Supply Statement). At least 12,149 additional PBSA bedspaces (15,000 minus 2,851) will need to be delivered before it is necessary to count student accommodation towards the housing supply based on the amount of accommodation it releases in the wider housing market.

Table 4: PBSA bedspace supply included the Exeter Plan Housing Trajectory

Source	PBSA bedspace
2022/23 completions	207
2023/24 completions	75
2024/25 completions	101
Planning permissions at 1 April 2025	1,772
Housing allocations	696
Total	2,851

Over-concentration of PBSA

- 6.4 In the Full Draft Plan (Regulation 18), Policy H8 (PBSA) stated that PBSA proposals will be supported when they do not contribute towards an excessive concentration of PBSA in the locality. The requirement was included to allow consideration of community mix at the planning application stage.
- 6.5 The requirement was removed from the PBSA policy (H10) in the Publication Plan (Regulation 19). This was due to potential incompatibility with the City Council's net zero agenda, which in a pure sense requires PBSA to be concentrated on the University of Exeter's campuses and in areas of the city that are within walking and cycling distance of the campuses. However, paragraph 6.57 of the Plan's supporting text still referred to the importance of mixed communities.
- 6.6 At Regulation 19 consultation stage, several representations objected to the policy change on grounds that it weakened the City Council's ability to consider the impact of PBSA proposals on community mix.
- 6.7 Having reflected further since Regulation 19 stage, the City Council concludes that it is important to be able to consider the impact of an over-concentration of any type of housing development on mixed communities. Therefore, the City Council has suggested major and additional modifications to Policy H15 (Housing density and size mix) to allow for consideration of housing-type mix, so that over-concentrations of *any* housing type (including PBSA) that would harm the character of a locality can be avoided.

7. Homes for older people

Overall need for homes for older people: overall need

- 7.1 The 2024 LHNA concludes that an additional 880 specialist homes for older people are needed in the city over the Plan period, whilst acknowledging that national and local policies (for example, Exeter Plan Policy H14 (Accessible homes)) may result in an increase in the stock of adapted and accessible properties in the coming years, which may reduce this need over time. The figure of 880 is based on consideration of existing stock, unmet demand and population growth over the Plan period. It equates to an average of 44 homes per annum and 7% of the LHN. 'Housing with care' (e.g. extra care or enhanced sheltered housing) comprises around 20% of the need and 'housing with support' (e.g. retirement living or sheltered housing) comprises the remainder.
- 7.2 The findings are summarised in paragraphs 31 to 35 of the 2024 LHNA's Executive Summary and provided in full in chapter 7 (pages 72 to 79) of the main part of the document.

Extra care housing needs

- 7.3 Devon County Council (DCC) has evidence³³ demonstrating a current need for 151 extra care bedspaces in Exeter, plus an additional 252 bedspaces by 2033. In Duty to Cooperate discussions, DCC has advised the City Council that the current need equates to a requirement for two extra care schemes in Exeter for older adults or those with disabilities. This requirement is reflected in the Plan's Infrastructure Delivery Plan, demonstrating the City Council's commitment to enabling extra care housing.
- 7.4 The City Council has delivered extra care housing in partnership with DCC in the recent past: in 2021/22, a 53-bed extra care development of affordable rent apartments (Edwards Court) was completed by the City Council, on land owned by DCC. The facility is managed by the City Council, with allocations considered by a Panel represented by both local authorities and a care service provider.
- 7.5 To help ensure delivery of one of the two extra developments currently needed, criterion A(iv) of Plan Policy SBA1 (Water Lane) requires development at Water Lane to include a 70-unit extra care housing scheme. There is significant un-consented land available at Water Lane to meet this need, including land owned by the City Council. Collaborative work with other landowners / prospective developers at Water Lane, DCC and Homes England will also continue, to help ensure that this extra care scheme is delivered.
- 7.6 The City Council expects that the second extra care housing scheme required by DCC will be delivered at the Clifton Hill Sports Centre site (see site ref. MSD23 in appendix B of the Housing Trajectory). Positive pre-application discussions between the City Council and an extra care developer have been completed and the City Council has formally resolved to sell the site at an

³³ Extra Care Housing: Refresh of the Commissioning Strategy for Extra Care Housing (2009). Devon County Council. August 2015.

undervalue to the developer, subject to planning permission being obtained. This demonstrates the City Council's commitment to extra care provision in Exeter. As such, it is not necessary to identify and allocate a second site in the Exeter Plan for the provision of extra care housing. Policy H8 (Homes for Older People) will also allow additional or alternative sites to come forward to meet current and future extra care housing needs.

Affordable housing for older people

- 7.7 Criterion f of Policy H8 requires (major) developments providing self-contained homes for older people to deliver affordable housing in accordance with Policy H4. Various representations were made at Regulation 19 stage stating that it is not viable for older persons' housing to contribute towards affordable housing and that criterion f should therefore be deleted from Policy H8.
- 7.8 Paragraph 5.13 of the 2024 LPVA notes that older persons' housing has weaker viability than many other forms of residential development. In terms of the typologies tested for Exeter, the 2024 LPVA concludes that:
- Extra care and care homes are not viable under any of the circumstances tested, although, at lower benchmark land value tested, extra care is marginal with no affordable housing; and
 - Sheltered housing is only viable with limited headroom with no affordable housing.
- 7.9 However, paragraph 2.20 of the 2025 LPVA advises that the older persons housing typologies used in the 2024 LPVA reflected a standard set of assumptions and that, in other circumstances, a developer might take a different approach that could make development more viable. The 2025 LPVA also advises that the 2024 LPVA viability testing assumed brownfield land and that if housing for older people was to come forward on a greenfield site, it could provide for stronger viability.
- 7.10 Table 2.1 of 2025 LPVA lists examples of older persons' housing schemes that have recently been developed in Exeter or are under construction. These examples demonstrate that such development is viable in Exeter. Paragraph 2.21 of the 2025 LPVA notes that the schemes have also included provision for affordable housing, primarily via financial contributions. Based on these examples, the 2025 LPVA concludes that it is reasonable for the City Council to continue to request affordable housing contributions from older persons' housing schemes.
- 7.11 Additional reasons to justify retaining criterion f in Policy H8 are as follows:
- Of the additional need for homes for older people in the city, paragraph 7.36 of the 2024 LHNA concludes that 49% is required as affordable housing. This is a significant level of affordable housing need. Deletion of criterion f will severely limit the City Council's ability to meet this need; and

- Whilst current market conditions may make the viability of homes for older people challenging and mean that they cannot provide policy-compliant levels of affordable housing, this may change over the Plan period.

7.12 Given the above, the City Council considers it justified and appropriate to retain criterion f in Policy H8. As set out in paragraph 6.20 of the Plan's supporting text, the City Council will consider a departure from the affordable housing targets in Policy H4 if supported by viability evidence. This approach strikes an appropriate balance between seeking to meet Exeter's high relative need for affordable housing for older people and viability considerations.

8. Accessible homes

National policy context

- 8.1 Paragraph 63 of the 2023 NPPF identifies people with disabilities as a group in the community whose housing needs should be reflected in planning policies.
- 8.2 At paragraphs 008 and 009, the Housing for Older and Disabled People PPG³⁴ notes that accessible and adaptable housing enables people to live more independently whilst also saving on health and social care costs in the future. It states that, where there is a need for accessible and adaptable housing, plans can set out the proportion of new housing that should meet the following Building Regulations standards:
- M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement);
 - M4(2): Category 2: Accessible and adaptable dwellings; and
 - M4(3): Category 3: Wheelchair user dwellings.
- 8.3 Part M of the Building Regulations subdivides the M4(3) standard into:
- M4(3)a: Wheelchair adaptable dwellings (homes that can easily be adapted to meet the needs of a wheelchair user); and
 - M4(3)b: Wheelchair accessible dwellings (homes that are useable by a wheelchair user at the point of completion).
- 8.4 Paragraph 009 of the Housing Options Technical Standards PPG³⁵ is clear that wheelchair accessible homes should only be sought where the local authority is responsible for allocating or nominating a person to live in the home. Effectively, this means that wheelchair accessible homes can only be sought where a home meets the NPPF's definition of affordable housing.
- 8.5 In 2020, the previous Government consulted on a policy to raise the accessibility standards for new homes. Following consultation, in 2022 the Government proposed to mandate the current M4(2) option requirement in building regulations as a minimum standard for all new homes³⁶. The proposal was confirmed by the Parliamentary Under Secretary (DLUHC) on 5 February 2025³⁷. The Government has not yet set out a timetable to introduce the requirement.

³⁴ [\[ARCHIVED CONTENT\] Housing for older and disabled people - GOV.UK](#), DLUHC and MHCLG. June 2019.

³⁵ [\[ARCHIVED CONTENT\] Housing: optional technical standards - GOV.UK](#), DLUHC and MHCLG. March 2015.

³⁶ Raising Accessibility Standards for New Homes: Summary of Consultation Responses and Government Response, DLUHC. July 2022.

³⁷ Hansard vol.823: Housing Accessibility Standards, House of Lords. February 2025.

Policy H14: Accessible homes

- 8.6 Policy H14 of the Plan requires that 10% of affordable homes meet M4(3) standard, and that the remaining affordable homes and all market homes meet M4(2) standard. Paragraph 6.79 of the supporting text explains the circumstances under which the City Council will accept a departure from these percentages and further information regarding viability considerations is provided in Policy IF2 of the Plan. It is not necessary to repeat these circumstances in Policy H14 itself.
- 8.7 The policy expectation that 10% of affordable homes should be wheelchair accessible (M4(3) standard) is informed by:
- The 2024 LHNA (paragraph 78), which concludes that local evidence supports at least 11% of all new affordable housing being wheelchair accessible, although a slightly higher target (e.g. 15%) might be considered to avoid situations in which a property is not available for a wheelchair user in affordable need; and
 - The 2024 LPVA, which concludes that a 10% M4(3) requirement is viable for all typologies and locations tested.
- 8.8 Exeter's affordable housing waiting list always includes households in need of M4(3) housing, but the wheelchair accessibility requirements of each household often differ. Paragraph 6.78 of the Plan's supporting text explains that the City Council will advise developers of any specific M4(3) requirements as early as possible in the planning process, based on needs at the time.
- 8.9 To fully reflect the need for M4(3) housing demonstrated by the 2024 LHNA, the City Council has suggested a main modification to Policy H14. The suggestion is that the Policy should be amended to require 'at least' 10% of affordable homes to meet M4(3) standard.
- 8.10 The policy expectation that all other affordable homes, and all market homes, should be built to accessible and adaptable (M4(2)) standard is appropriate due to:
- The emerging Government policy to mandate M4(2) standard as a minimum requirement for all new homes. Until the Government introduces this as national policy, it is appropriate that the City Council should seek the M4(2) standard locally; and
 - The 2024 LPVA, which concludes that the requirement is viable for all typologies and locations tested.

9. Nationally Described Space Standard

National and local policy context

- 9.1 The Government introduced the Nationally Described Space Standard in March 2015³⁸. The aim was to simplify differing space standards into a more streamlined system that would make it easier and cheaper for developers to build homes to a high standard. The NDSS were treated as optional standards that could be adopted in Local Plans if local need was demonstrated.
- 9.2 The PPG on Housing: Optional Technical Standards (paragraph 018) has consistently stated that any internal space standards that local authorities adopt must be the NDSS. The PPG requires that the following are considered before NDSS can be included in local planning policy:
- Whether there is a need for additional standards;
 - The viability of imposing the standards; and
 - The timing of introduction, to allow a reasonable transition period.
- 9.3 At the time the Government introduced the NDSS, the City Council had its own local internal space standards for new build homes. These are contained in the Residential Design Guide Supplementary Planning Document (2010) (SPD)³⁹, which amplifies saved policies DG1, DG2 and DG4 of the Exeter Local Plan First Review (adopted 2005). The standards were introduced to secure well-designed, good quality new homes.
- 9.4 The Written Ministerial Statement⁴⁰ published alongside the NDSS set out transitional arrangements for replacing locally adopted space standards with the NDSS. It states that “Planning permission may still be granted on the basis of existing Local Plan...policies on...internal space..., even though they have a degree of conflict with the new national technical standards.” In 2015, the City Council assessed the degree of conflict between the NDSS and standards in the SPD to be minimal (e.g. the SPD’s minimum gross internal floor area (GIA) standards for 1-storey dwellings are the same as the NDSS and the SPD’s minimum GIA and bedroom size standards are only marginally higher than the NDSS). As such, since 2015 the City Council has applied the NDSS with reference to the saved Local Plan policies and the Residential Design Guide SPD. Therefore, there is a 10-year history in Exeter of considering the NDSS when determining planning applications.

Why should NDSS be applied?

- 9.5 Policy H16, criterion a (second part of the policy) of the Plan requires that new homes must provide sufficient functional internal layout and living space, including compliance with NDSS. There are fundamental reasons why it is appropriate to include this requirement in Policy H16.
- 9.6 Paragraph 135(f) of the 2023 NPPF is clear that planning policies and decisions should ensure that developments create safe and accessible living

³⁸ Technical Housing Standards – Nationally Described Space Standards, MHCLG and DLUHC.

³⁹ Residential Design Supplementary Planning Document, Exeter City Council. 2010.

⁴⁰ Planning Update March 2015, HMCLG and The Rt Hon Lord Pickles. March 2015.

environments that promote health and well-being. Specific reference to the NDSS is made in accompanying footnote 52, to help achieve such living environments.

- 9.7 The Plan aims to help achieve the 2040 Liveable Exeter Vision, which includes the principles of “a healthy and inclusive city” and a “liveable and connected city”. Drawing on this, the Plan’s spatial strategy (Policy S1) identifies the need for good quality homes of a variety of types to meet Exeter’s various needs.
- 9.8 The NDSS provides clear guidelines to ensure new homes are consistently of good quality in terms of internal space. Minimum internal space standards can help to reduce the gap between the quality of housing available to different income groups, promoting mixed communities, which can in turn help to reduce social isolation and promote community cohesion and inclusivity.
- 9.9 Studies have shown that minimum internal space standards have also been shown to positively impact physical and mental health and well-being, through the avoidance of cramped and poorly designed living conditions⁴¹. The availability of internal space can also affect the ability of homes to cater to the different needs of residents over time. Internal spaces must be fit for purpose, allowing residents to undertake day-to-day activities at a given level of occupancy. Space is needed for socialising, privacy, studying / working and storage etc. and should be efficient and adaptable for changing needs such as the increased requirement / demand post-Covid 19 to work from home. Habitable rooms must be able to accommodate appropriate furniture and ensure adequate space to move within the room.
- 9.10 As a final point, a sizeable portion of Exeter’s future housing supply will be in the form of relatively high-density development, often provided with less outside space than detached and semi-detached houses. Therefore, it is particularly important that the City Council can continue to secure minimum internal space standards through the development plan, to provide good living conditions for residents.

The need for NDSS in Exeter

- 9.11 The 2023 PPG states that, to establish a need for internal space standards, evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting the NDSS can be properly assessed.
- 9.12 As set out above, the City Council originally introduced internal space standards in 2010 via the Residential Design Guide SPD. The need for the standards was identified by research undertaken in 2008/09 whilst preparing the SPD. This included two workshops with residents representing a range of house tenures, types and ages. Residents expressed concerns about the lack of internal space available in new build homes.

⁴¹ For example, Marsh R, Chang M and Wood J. The relationship between housing created through Permitted Development Rights and health: a systematic review. Cities Health. 2022. Also Roberts-Hughes R. The case for space. RIBA. 2011.

- 9.13 A third workshop was held with a range of housing developers. The consensus amongst attendees was that internal space standards provide helpful consistency and drive-up housing quality. Comments included:
- Homes are valued on number of rooms (including W.C.s) rather than size. This incentivises building homes with relatively small rooms;
 - Land bidding can drive developers into building a larger number of small-sized homes in the absence of space standards;
 - A policy requirement for higher densities can result in reduced room sizes for market homes; and
 - The housing market would not deliver good internal space standards without regulation, but developers will accept regulation if it provides a level playing field.
- 9.14 Whilst this research is some years old, there is no reason to conclude that the need for internal space standards in Exeter has fallen away. Removing the ability to seek the NDSS could result in the problems identified by residents and developers in 2008/09 resurfacing. For this reason, it is important that the City Council can continue to apply NDSS to achieve good quality housing.
- 9.15 It is worth noting that, following changes to permitted development rights made by the Government in recent years, some types of development involving the creation of new homes through change of use now fall outside usual development management processes. Initially in these cases, local planning authorities had very limited control over space and other standards. This led to local and national concerns about whether homes delivered under permitted development rights included adequate space and light.
- 9.16 In April 2021, the Government took steps to rectify this position via updated legislation relevant to prior approval applications for new dwellings (including through change of use). Permitted development legislation now specifies that any new dwellinghouse will only be eligible for permitted development rights if it has a gross internal floor area of at least 37 square metres and complies with the NDSS.
- 9.17 From the City Council's point of view, since April 2021 this has meant that prior approval schemes must meet the NDSS. It also indicates the Government's own view that the planning system needs minimum space standards to ensure good quality housing.
- 9.18 The continuing need for NDSS in Exeter is also evidenced by the experience of the City Council's development management officers. Officers apply saved Local Plan policies DG1, DG2 and DG4 and the SPD to seek NDSS in all relevant cases. Where planning applications fail to meet NDSS, officers use the existing policies to negotiate improved internal space provision. As a result, of relevant schemes⁴² that were completed in 2024/25 or had detailed planning consent for housing at 1 April 2025, officer reports are clear that 71% met the NDSS and 10% were largely compliant. Officer reports for the remaining 19% of schemes do not specifically refer to NDSS but do generally

⁴² Relevant schemes exclude sui generis housing (co-living and purpose-built student accommodation) and C2 Use Class housing (e.g. care and retirement homes). They also exclude prior approvals granted before the change in legislation described in paragraph 3.6 of this report, dwellings established via certificates of lawfulness) and detailed consents granted prior to adoption of the Residential Design Guide SPD.

refer to the SPD. Therefore, it is likely that most of these schemes also meet or closely align with the NDSS.

Viability

- 9.19 The 2023 PPG states that the impact of adopting NDSS should be considered as part of a plan's viability assessment, taking into account the impact of potentially larger dwellings on land supply. Local planning authorities also need to consider impacts on affordability.
- 9.20 Paragraph 4.2 of the 2024 LPVA confirms that the typologies tested by the consultants are based on NDSS. Therefore, the requirement to meet NDSS is reflected in the LVPA and is, in turn, reflected in other Plan policies that have implications for housing supply. However, it is recognised that some specific forms of development may have viability challenges. Policy IF2 of the Plan allows for issues around viability to be assessed on a case-by-case basis. This approach reflects how the City Council's has implemented the current NDSS requirement since 2015.

Transitional arrangements

- 9.21 The 2023 PPG states that a reasonable transitional period may be needed following adoption of a new NDSS policy, to enable developers to factor the cost of space standards into future land acquisitions.
- 9.22 Given that the City Council has sought NDSS from relevant new housing development since 2015, there is no need to include transitional arrangements in Policy H16. The Policy is a continuation of the City Council's current approach.

Conclusion

- 9.23 As set out above, there is a need for internal space standards in Exeter to ensure good quality housing. This is evidenced by the views expressed by residents and developers during preparation of the Residential Design SPD, the experience of development management officers since then, and the Government's response to initial concerns about the quality of homes created via permitted development rights. Removing the City Council's ability to seek the NDSS may lead to a resurgence of the issues set out in paragraphs 9.12 and 9.13 above, particularly given the Plan's strategy to optimise development densities.
- 9.24 The fact that the NDSS is largely being met in Exeter at present, and that housing supply in the city is good (as evidenced consistently by the Housing Delivery Test results) indicates that the NDSS is generally viable. The standards have also been considered in the 2024 and 2025 LVPA and developers will continue to be able to raise viability concerns on a case-by-case basis, should they arise.
- 9.25 Finally, there is no need to apply a transitional period, as the NDSS has been applied by the City Council since 2015.

Appendix A – Email from DELTA regarding co-living housing

MSD-102742 Delta - HRF 2023/24 query

CB

Catherine Bernard

To

Katharine Smith

Mon 02/06/2025 15:10

Reply

Reply All

Forward

You forwarded this message on 03/06/2025 09:24.

If there are problems with how this message is displayed, click here to view it in a web browser.

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Reply above this line.

Catherine Bernard commented:

Hi Katharine,

Thank you for your e-mail.

In principle, if the co-living units are self-contained units, with no restrictions on occupancy (but with social spaces in the building such as a cinema room/gym, these are normally counted in the main dwelling stock section. It depends on the configuration, and a decision for the local authority in accordance with the evidence and the HFR guidance notes (link below). For example, if it's for 1 person and it's a single self contained 1-bedroom or studio flat, that's 1 dwelling. If they are a 1 self-contained student cluster unit (eg with 4 bedrooms, 1 kitchen), that 1 dwelling equivalent. Communal accommodation would tend to be more simple accommodation (ie just a room with a bed and a desk, meals eaten in a central dining area only – ie in a traditional halls of residence). (Dwelling stock data: notes and definitions (includes HFR full guidance notes and returns form) - GOV.UK)

<https://url.uk.m.mimecastprotect.com/s/D4TtCLJY1IQoxEkiBfZhyrs-u?domain=gov.uk>

Catherine Bernard resolved this as Done.

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