

Exeter Plan

Hearing statement

**Matter 7:
Meeting Housing Needs**

February 2026

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



Contents

1.	Introduction.....	6
2.	Issue 1: Affordable Housing – Policy H4	7
Q1.	How will affordable housing be delivered on brownfield land as a result of Policy H4? Does this approach reflect the evidence in the Local Plan Viability Assessment and its Addendum?.....	7
Q2.	How have the requirements for affordable housing on brownfield land been established as part of the plan-making process? Are they justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	7
Q3.	Should the requirements for affordable housing on brownfield land also apply to greenfield land? Is the policy sufficiently flexible in this regard to be effective?	8
Q4.	Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?	9
Q5.	What are the viability implications of the preference for 30% for all first homes that meet the affordable home ownership requirement to be sold at a 50% market price discount?	9
Q6.	What would constitute the ‘exceptional circumstances’ to enable off site delivery of affordable housing?	10
Q7.	For soundness, is it necessary for affordable housing delivery to be shown in the trajectory?	10
Q8.	What is the justification for the suggested modifications to Policy H4? Why are they necessary for soundness?	10
3.	Issue 2: Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12	11
Q1.	What are the identified needs for housing for older people, build-to-rent housing and co-living housing in Exeter and how will these respective needs be met over the plan period?	11
Q2.	How would co-living housing provide ‘high quality accommodation’? Should Policy H6 include minimum communal room sizes and functional definitions for these spaces? Would co-living housing be expected to meet the needs of people with disabilities? Is Policy H6 sufficiently clear and effective in these regards?	12
Q3.	How have the effects of the development and potential overconcentration of co-living housing, houses in multiple occupation and/or purpose-built student accommodation on the residential amenity of existing residents and communities been considered in the formulation of Policies H6, H10 and H12? Are the policies sufficiently clear and effective in this regard?.....	12
Q4.	What is the justification for the locational requirements for purpose-built student accommodation in Policy H10?	13
Q5.	Would purpose-built student accommodation be expected to meet the needs of people with disabilities? How would the private car-parking needs of such	

students be met? Is Policy H10 sufficiently clear and effective in these regards?	14
Q6. Are the affordable housing requirements in Policies H8 and H9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	14
Q7. How would the letting of purpose- built student accommodation during holiday periods be controlled? Is Policy H10 sufficiently clear and effective in this regard?	15
Q8. How would Policy H12 effectively control net increases in water discharges? What would constitute the 'exceptional circumstances' mentioned in paragraph 6.72?	15
Q9. How has the Exeter St James Neighbourhood Plan and its principle of 'community balance' been considered in the formulation of these policies? ...	15
Q10. Are policies H5, H6, H8, H9, H10 and H12 positively prepared, justified, effective and consistent with national planning policy?	15
Q11. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	16
4. Issue 3: Custom and Self-Build Housing – Policy H7	17
Q1. What is the identified need for self-build and custom housebuilding in Exeter? How did the Council identify this need, and will it be met over the Plan period?	17
Q2. How many self or custom build homes have been provided as a percentage of total output over the past 5 years?	17
Q3. How many self or custom build homes will be delivered in Exeter given the minimum density of 50 dwellings per hectare recommended by the Exeter Density Study?	18
Q4. Are the requirements set out in Policy H7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?	18
Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	19
5. Issue 4: Meeting the Needs of Gypsies and Travellers – Policy H11	20
Q1. What is the total need figure over the plan period? What is it based on and how has it been calculated? Is the Exeter City Council Gypsy and Traveller Accommodation Assessment and its methodology appropriate and sufficiently robust?	20
Q2. Taking into account the answer above, what is the total number of additional pitches required over the plan period to meet this need?	20
Q3. Does the Plan make suitable provision to meet identified needs? Will needs be met in full? Is there an over-reliance on windfall sites to meet these needs? If so, is this approach justified?	21
Q4. Has the Council identified any needs for transit site provision, and how will these needs be met?	21

Q5.	Does the Plan provide sufficient pitches to provide five-years' worth of supply?	22
Q6.	Is Policy H11 positively prepared, justified, effective and consistent with national planning policy as set out in paragraph 63 of the Framework?	22
Q7.	What is the justification for the suggested modifications to Policy H11? Why are they necessary for soundness?	22
6.	Issue 5: Residential Accommodation, Amenity and Healthy Homes – Policies H13 and H16	24
Q1.	How would Policy H13 be effectively implemented?	24
Q2.	What is the justification for the requirement for Nationally Described Space standards (NDSS) in Policy H16?	24
Q3.	Are Policies H13 and H16 positively prepared, justified, effective and where relevant, consistent with national planning policy?	24
Q4.	In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?	25
7.	Issue 6: Accessible Homes – Policy H14	26
Q1.	How has the requirement that 10% of affordable homes should be built to meet wheelchair user and accessible and adaptable standards, as set out in Policy H14, been established as part of the plan-making process? Is it based on robust, up to date evidence?	26
Q2.	Based on the number of housing sites allocated in the Local Plan (without planning permission) how many wheelchair adaptable dwellings are expected to be provided? How does this compare to the identified need?	26
Q3.	What is the justification for the thresholds in Policy H14 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?	27
Q4.	Does Policy H14 consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, as required by the PPG12?	27
Q5.	What is the justification for the suggested modifications to Policy H14? Why are they necessary for soundness?	28
8.	Issue 7: Housing Density and Mix – Policy H15	29
Q1.	Is Policy H15 sufficiently clear in relation to the types of housing to be provided and the housing mix expected? Is it effective in these regards?	29
Q2.	What are the implications of this drive towards higher densities in Exeter? Would this approach lead to more tall buildings within the city? If so, should the Plan include a tall buildings policy? How has the Exeter Skyline Study been considered in formulating this approach?	29
Q3.	Is Policy H15 sufficiently clear in relation to what is expected of the density of development and what the implications of higher densities could potentially be? Should it include a minimum density standard for city and town centres and other locations that are well served by public transport as per paragraph 129 of the Framework?	30

Q4.	Is the delivery of Policy H15 over-reliant on the provision of flatted accommodation? How much of this type of accommodation been delivered in the city in the last five to ten years?	31
Q5.	Is Policy H15 positively prepared, justified, effective and consistent with national planning policy?.....	31
Q6.	What is the justification for the suggested modifications to Policy H15? Why are they necessary for soundness?	32
9.	Summary	33
APPENDIX A: Major brownfield planning applications determined over the past 5 years, where affordable housing contributions have been secured or negotiated (excludes Build to Rent schemes)		34
APPENDIX B: Major greenfield planning applications determined over the past 5 years, where affordable housing contributions have been secured or negotiated (excludes Build to Rent schemes)		36
APPENDIX C: Anticipated delivery of affordable homes (AH)		40
APPENDIX D: Email from Exeter University		48
APPENDIX E: Examples of privately-managed PBSA schemes.....		49

1. Introduction

- 1.1. This hearing statement responds to the Exeter Plan Inspectors' questions relating to Matter 7 which addresses meeting housing needs.
- 1.2. The statement is divided into sections which cover each of the following issues:
 - Issue 1: Affordable Housing – Policy H4
 - Issue 2: Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12
 - Issue 3: Custom and Self-Build Housing – Policy H7
 - Issue 4: Meeting the Needs of Gypsies and Travellers – Policy H11
 - Issue 5: Residential Accommodation, Amenity and Healthy Homes – Policies H13 and H16
 - Issue 6: Accessible Homes – Policy H14
 - Issue 7: Housing Density and Mix – Policy H15

2. Issue 1: Affordable Housing – Policy H4

Q1. How will affordable housing be delivered on brownfield land as a result of Policy H4? Does this approach reflect the evidence in the Local Plan Viability Assessment and its Addendum?

2.1 Policy H4 will result in the delivery of affordable housing on brownfield land by means of Section 106 Agreements. Evidence that brownfield land in Exeter can support the delivery of affordable housing is provided by:

- Viability testing in the Local Plan Viability Assessment (LPVA) (EVB-IF-01a: pages 41 to 43, paragraphs 5.9 and 5.11).
- For site specific testing, the executive summary on pages 3 and 4 of the Local Plan Viability Assessment Addendum (LPVA-A) (EVB-IF-01b), with further details in the concluding sections of chapters 4-9 and appendix A.
- Evidence in appendix A to this Statement, which lists schemes where affordable housing has been secured and/or delivered on brownfield sites in Exeter over the past 5 years, and the amount secured.

2.2 The evidence shows that policy H4's 15% affordable housing target and tenure split are viable in most circumstances, in the context of the Plan's wider policy framework.

Q2. How have the requirements for affordable housing on brownfield land been established as part of the plan-making process? Are they justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

2.3 The requirements have been established based on robust and up-to-date evidence of:

- The total need for affordable housing (32.5% of Exeter's local housing need), and the tenures of affordable housing that can be afforded (EVB-H-01a: in particular, page 67, figure 49).
- Viability (EVB-IF-01a: page 41, paragraph 5.9; page 42, paragraph 5.11; and page 45, paragraph 5.20) (EVB-H-01b: please see the page and section numbers referred to in the response to Q1. above). The LPVA and LPVA-A show that a 15% target with the preferred tenure split is generally viable for the Plan's brownfield site allocations in the context of whole-Plan viability. The target was established through previous work (see EVB-H-01a: page 19, paragraph 3.23).

2.4 Also, the requirements have been established through consideration of reasonable alternatives in the Sustainability Appraisal Report (EXM-02a: page 151, paragraph 6.125 to 6.127), which concludes that a different target and tenure split are not appropriate given the evidence of need and viability.

2.5 The evidence documents were prepared by specialist consultants and are consistent with methodologies and guidance in the Housing and Employment

Needs Assessment, Viability and Strategic Environmental Assessment and Sustainability Appraisal PPGs. As such, the requirements are justified.

- 2.6 The requirements seek to meet as much of the evidenced need for affordable housing as possible, whilst at the same time ensuring that development is viable and deliverable. As such, they are consistent with NPPF paragraph 63 and the Viability PPG.
- 2.7 Given the viability evidence, it is unlikely that a higher brownfield affordable housing target would deliver more affordable homes. It could also negatively affect housing delivery by deterring development or by leading to unnecessary and protracted site-specific viability negotiations.
- 2.8 To fully ensure viability and therefore deliverability, paragraph 6.20 of the Plan is clear that the Council will consider a lower level of affordable housing provision or an alternative tenure split subject to a site-specific viability appraisal. In addition, criterion (a) of policy H4 is clear that the Council will consider swapping social rent for affordable rent.
- 2.9 The requirements in policy H4 (e) and (h) are consistent with national policy in paragraphs 64 and 65 of the NPPF.
- 2.10 The Council has suggested a main modification (CSD-03: page 13, SMM30) to ensure that policy H4(b) is based on robust evidence of need and is thereby consistent with NPPF paragraph 63. The 2024 LHNA (EVB-H-01a) does not test a 50% market discount. However, it concludes that a far greater proportion of households in need of affordable housing can afford a First Home with a discount of 40% from market prices (31.8%) compared to the proportion who can afford a First Home with a discount of only 30% (17.5%) (see page 67, figure 49; and page 69, figure 51). Suggested modification SMM30 reflects this conclusion and so suggests a 40% discount.

Q3. Should the requirements for affordable housing on brownfield land also apply to greenfield land? Is the policy sufficiently flexible in this regard to be effective?

- 2.11 A higher (35%) target for greenfield sites compared to brownfield sites is justified by:
- The level of need for affordable housing evidenced in the 2024 Exeter LHNA (EVB-H-01a: page 67, figure 49).
 - The LPVA, which is clear that greenfield land can generally support a higher 35% affordable housing target compared to brownfield land (EVB-IF-01a: pages 41 to 43, paragraphs 5.10 and 5.11).
 - Evidence in appendix B to this Statement, which shows that 35% affordable housing has generally been achieved on major greenfield developments in Exeter over the past 5 years.
- 2.12 The higher target is consistent with NPPF paragraph 63 and the Viability PPG because it reflects the assessed need for affordable housing, in the context of viability considerations.

- 2.13 To fully ensure that the policy is effective, paragraph 6.20 of the Plan is clear that the Council will consider a lower level of affordable housing should this be supported through a site-specific viability appraisal.
- 2.14 Aside from the affordable housing target, the affordable housing requirements for brownfield and greenfield sites in policy H4 are the same.

Q4. Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?

- 2.15 Appendix C to this Statement shows that the Council expects the Plan to deliver between c.2,420 and 2,680 affordable homes through policies H4, H5, H7, H8, H9 and H11. This equates to between 63% and 70% of Exeter's affordable housing need (3,821 homes: see EVB-H-01a: page 9, paragraph 20 and figure 4), or 67% on average¹. It is reasonable to assume that additional affordable homes will be delivered on windfall sites.
- 2.16 The Housing Topic Paper (TOP-01: pages 30 and 31, paragraph 5.23) explains how the Council will work to deliver additional affordable homes to those secured through policies H4 and H5. The needs of some households in affordable housing need will also be met through the private rented sector, although it is accepted that this may place greater burdens on local housing allowance payments.
- 2.17 The following alternative options to deliver more affordable homes through policy H4 have been considered through the Sustainability Appraisal (SA) process:
- Set a higher affordable housing target (EXM-02a: page 151, paragraph 6.125, first bullet point). This option is not supported by viability evidence in the LVPA.
 - Increase the housing requirement (EXM-02a: pages 144 to 145, paragraph 6.101, first bullet point). This option is not supported on grounds that 'delivering a higher figure could result in greater (negative) impacts in the city and may not be deliverable'. Furthermore, as explained in the Housing Topic Paper (TOP-01: pages 7 and 8: paragraphs 2.16 to 2.17 and 2.19), c.67% is a sufficient level of provision in the context of policy in the NPPF.

Q5. What are the viability implications of the preference for 30% for all first homes that meet the affordable home ownership requirement to be sold at a 50% market price discount?

- 2.18 Policy H4 does not require First Homes to be included in the affordable housing mix. In the LPVA (EVB-IF-01a) and LPVA-A (EVB-IF-01b), shared ownership was tested as the affordable home ownership tenure because this is most likely to be the type of affordable home ownership provided through policy H4. Very few First Homes have been delivered in Exeter to date,

¹ The Housing Topic Paper (TOP-01: paragraph 5.21) incorrectly states an average of 64%.

indicating a lack of interest from developers despite current national and local policy requirements. Policy H4(b) is merely included to show the discount required to meet affordability considerations, should First Homes ever be proposed.

Q6. What would constitute the ‘exceptional circumstances’ to enable off site delivery of affordable housing?

2.19 Paragraph 6.21 of the Plan identifies the creation of a better mix of housing tenures in a locality as a potential exceptional circumstance, consistent with NPPF paragraph 64b. The Plan does not identify other exceptional circumstances. These will be for the applicant to justify, on a case-by-case basis.

Q7. For soundness, is it necessary for affordable housing delivery to be shown in the trajectory?

2.20 No, it is not necessary:

- To be consistent with NPPF paragraph 75, the housing trajectory should illustrate the expected rate of housing delivery over the plan period. The NPPF does not require the trajectory to show delivery of specific types of housing (including affordable housing).
- Showing affordable housing delivery in the trajectory may be ineffective, because it is more difficult to accurately predict affordable housing delivery compared to housing delivery as a whole.

Q8. What is the justification for the suggested modifications to Policy H4? Why are they necessary for soundness?

2.21 Suggested modification SMM29 (CSD-03: page 13) will clarify that criteria (a) to (h) of policy H4 apply to both greenfield and brownfield sites. Therefore, it will ensure policy H4 is positively prepared, effective at delivering affordable housing and consistent with national policy.

2.22 Suggested modification SMM30 (CSD-03: page 13) will ensure that policy H4 reflects the evidence of need for First Homes in the 2024 Exeter LHNA. Therefore, it will ensure the policy is justified.

3. Issue 2: Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12

9. *Paragraph 63 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.*

Q1. What are the identified needs for housing for older people, build-to-rent housing and co-living housing in Exeter and how will these respective needs be met over the plan period?

Housing for older people

- 3.1 The housing needs of older people are identified in the:
- 2024 Exeter LHNA (EVB-H-01a: pages 72 to 81, paragraphs 7.4 to 7.41). This identifies a need for 880 specialist homes for older people over the Plan period, in addition to specialist homes provided since the start of the Plan period. 49% of the 880 homes need to be provided as affordable housing.
 - The 2015 Devon County Council Extra Care Housing Refresh (EVB-H-15: page 13, table 9). This shows a current need for 151 extra care units and an additional need for 252 extra care units to 2033.
- 3.2 The Housing Topic Paper (TOP-01: pages 34 and 35, paragraphs 7.5 to 7.12) explains how the current need for extra care housing will be met over the plan period (i.e. through provision of schemes at Water Lane via policy SBA1 of the Plan, and at the Clifton Hill Sports Centre site), and how policy H8(f) will help secure affordable homes for older people.
- 3.3 The Council expects that other types of housing for older people will continue to be delivered by the market, as has historically been the case in Exeter. Therefore, the Plan does not set targets or allocate sites for other types of housing for older people.

Build-to-rent and co-living housing

- 3.4 The 2024 Exeter LHNA (EVB-H-01a) does not identify a specific need for build-to-rent housing, of which co-living housing is a sub-set. However, it concludes that:
- Build-to-rent has the potential to increase the variety of housing products available in Exeter (page 33, paragraph 3.34).
 - The scale of student numbers (and therefore new graduates) in Exeter suggests there is a market for co-living units (page 90, paragraphs 7.80 to 7.85).
- 3.5 The Plan does not set targets or allocate sites for build-to-rent housing and co-living because:
- The market is already organically responding to demand for build-to-rent and co-living schemes, without targets or sites allocations.
 - Attempts to force the provision of build-to rent or co-living schemes may discourage development, or unduly prevent other housing needs from being met.

Q2. How would co-living housing provide ‘high quality accommodation’? Should Policy H6 include minimum communal room sizes and functional definitions for these spaces? Would co-living housing be expected to meet the needs of people with disabilities? Is Policy H6 sufficiently clear and effective in these regards?

- 3.6 Policy H6(b), (c) and (e-j), alongside the amenity requirements of policy H16, will ensure that co-living housing provides high quality accommodation. High quality co-living housing has already permitted or completed in Exeter, without the Council having adopted minimum communal room sizes or functional space definitions. Whilst there is an option to publish additional co-living planning guidance in the future, current evidence suggests this may not be necessary.
- 3.7 Under the current wording of policy H14, co-living housing will be expected to meet Building Regulations standard M4(2). It will therefore provide housing for a wide range of occupants including those with reduced mobility and some wheelchair users. However, it will not be expected to include housing built to M4(3) standard.
- 3.8 To ensure that people with disabilities are as equally able to live in and visit co-living housing as people without disabilities, it may be appropriate to consider a further modification to policy H6 to require provision of an element of M4(3)a (wheelchair adaptable) accommodation within co-living developments. This would support consistency with the 2010 Equality Act and would enable the Council to negotiate M4(3) accommodation on a case-by-case basis.
- 3.9 Policy H6(f) requires co-living schemes to meet the car parking needs of people with disabilities. Developers will be expected to have regard to disabled parking standards in the Council’s Sustainable Transport SPD. It may be appropriate to consider a modification to the supporting text to clarify this.
- 3.10 The Council considers that policy H10 is sufficiently clear to be effective at delivering high quality co-living housing that meets the needs of people with disabilities. It may be appropriate to consider the potential for additional modifications as set out above.

Q3. How have the effects of the development and potential overconcentration of co-living housing, houses in multiple occupation and/or purpose-built student accommodation on the residential amenity of existing residents and communities been considered in the formulation of Policies H6, H10 and H12? Are the policies sufficiently clear and effective in this regard?

Co-living and Purpose-built student accommodation (PBSA)

- 3.11 The Housing Topic Paper (TOP-01: pages 32 to 33, paragraphs 6.4 to 6.7) explains how the effects of a potential over-concentration of PBSA on community mix (and thereby on residential amenity) have been considered when formulating policy H10. Whilst TOP-01 only refers to PBSA, its explanation also applies to co-living housing and policy H6.

- 3.12 The Council has suggested modifications to policy H15 that will allow the impacts of an over-concentration of any type of housing development to be considered (CSD-03: page 20, SMM50; and pages 68 to 69, SAMM47 and SAMM48).
- 3.13 It would not be effective to define 'over-concentration' in policy H15, as this will depend upon a potentially complex range of factors including the type of housing proposed, the types of housing in the local area and who occupies/will occupy those homes. The suggested modifications are sufficiently clear to be effective on a case-by-case basis.
- 3.14 The amenity of existing residents and communities will also be safeguarded by
- Policy H6(i) and H10(e): Management Plans are already used effectively in Exeter to help safeguard amenity.
 - Policy H16: please see the response to Matter 7, Issue 5, Question 3, which explains how this policy is effective.

Houses in multiple occupation (HMOs)

- 3.15 HMOs provide an important source of relatively affordable accommodation for a wide range of people. However, over-concentrations of HMOs can lead to problems such as overcrowding, noise and disturbance, which can in turn affect residential amenity and the character of an area. Evidence recently commissioned by the Council concludes that these amenity problems generally occur when 20% or more homes in an area are HMOs (EXM-02s: page 61, paragraph 7.1). Based on this evidence, the Council defines an 'over-concentration of HMOs' as where 20% or more homes in a postcode or adjoining postcodes are HMOs. The definition in paragraph 6.72 of the Publication Plan is incorrect: the Council has suggested an additional modification to address this (CSD-03: page 67, SAMM44).
- 3.16 Subject to the additional modification, the second part of policy H12 clearly sets out how planning applications for new HMOs will be considered within the area covered by the Council's Article 4 Direction (where there is already an over-concentration of HMOs) and outside the Article 4 Direction. This will be effective in safeguarding the amenity of existing residents and communities.
- 3.17 Amenity also will be safeguarded by:
- Criterion (d) of the first part of policy H12, through the appropriate provision of car and bicycle parking and refuse facilities.
 - Criterion (b) of the first part of policy H12, which specifically relates to amenity.
 - Policy H16: please see the response to Matter 7, Issue 5, Question 3, which explains how policy H12 is effective.

Q4. What is the justification for the locational requirements for purpose-built student accommodation in Policy H10?

- 3.18 The locational requirements in policy H10 are justified by the Council's net zero ambition, as explained in paragraph 6.57 of the Plan.

Q5. Would purpose-built student accommodation be expected to meet the needs of people with disabilities? How would the private car-parking needs of such students be met? Is Policy H10 sufficiently clear and effective in these regards?

- 3.19 Policy H10 does not require the provision of accommodation to meet the needs of people with disabilities.
- 3.20 Under the current wording of policy H14, PBSA will be expected to meet Building Regulations standard M4(2); it will therefore provide accommodation for a wide range of occupants including those with reduced mobility and some wheelchair users. However, it will not be expected to include accommodation that meets M4(3) standard.
- 3.21 The University of Exeter have provided a statement confirming that they always aim to house wheelchair users in University campus accommodation (please see appendix D for the full statement). This indicates that the housing needs of wheelchair users can be met without M4(3) standard accommodation being provided in privately-managed PBSA.
- 3.22 However, to ensure that students with disabilities are as equally able to live in and visit privately-managed PBSA as students without disabilities, it may be appropriate to consider a further modification to policy H10 to require provision of an element of M4(3)a (wheelchair adaptable) accommodation within PBSA developments. This would allow the Council to negotiate M4(3) accommodation on a case-by-case basis and ensure that policy H10 is consistent with the 2010 Equality Act.
- 3.23 Policy H10(c) is clear that the car parking needs of students with disabilities should be met. Paragraph 6.73 clearly refers to the parking standards for disabled people contained in the Sustainable Transport SPD.

Q6. Are the affordable housing requirements in Policies H8 and H9 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 3.24 The Housing Topic Paper (TOP-01: pages 35 and 36, paragraphs 7.7 to 7.12) explains that the affordable housing requirement in policy H8 is:
- Justified and consistent with national policy in the Viability PPG, because it is based on robust and up-to-date evidence showing that it is viable and deliverable.
 - Consistent with NPPF paragraph 63, because it is based on robust evidence of the need for affordable housing for older people.
- 3.25 In terms of policy H9, Devon County Council (DCC) has advised the Council that there is a significant need for affordable supported housing in Exeter. Policy H9(g) is included on that basis. DCC, Torbay Council and all eight district/city councils in Devon have collectively commissioned a Supported and Specialist Housing and Accommodation Needs Assessment, which will provide up-to-date evidence of the need for supported accommodation for a range of

people with specialist needs. Based on DCC's advice, it is expected that the Assessment will identify a significant need for affordable supported housing.

Q7. How would the letting of purpose- built student accommodation during holiday periods be controlled? Is Policy H10 sufficiently clear and effective in this regard?

- 3.26 Letting during holiday periods can be effectively controlled via Section 106 Agreement or planning condition and the enforcement process, as is currently the case in Exeter. Paragraph 6.60 of the Plan makes the approach sufficiently clear to be effective.

Q8. How would Policy H12 effectively control net increases in water discharges? What would constitute the 'exceptional circumstances' mentioned in paragraph 6.72?

- 3.27 The Plan should be read as a whole. The Environment Agency has agreed that potential increases in net water discharges arising from residential conversions and HMOs do not need to be referred to in policy H12, but can effectively be controlled via policies CC7, CC8 and CC9 of the Plan (DTC-03g: page 15). The Council has suggested, and the Environment Agency has agreed to, an additional minor modification to paragraph 6.71 of the Plan to signpost these policies (CSD-03: page 66, SAMM43).
- 3.28 Paragraph 6.72 of the Plan explains that exceptional circumstances are identified on page 9, paragraph 6.1, of the Council's HMO Supplementary Planning Document². If necessary for soundness, these circumstances could be re-stated in paragraph 6.72.

Q9. How has the Exeter St James Neighbourhood Plan and its principle of 'community balance' been considered in the formulation of these policies?

- 3.29 The opinion of the Council's planning officers is that no community is balanced; therefore, the Plan avoids using the term 'community balance'. Instead, the Council considers the focus should be on the impacts that over-concentrations of different types of housing can have on existing residents and communities. To allow this, main and additional modifications to policy H15 and its supporting text are suggested (CSD-03: page 20, SMM50; and pages 68 to 69, SAMM47 and SAMM48).

Q10. Are policies H5, H6, H8, H9, H10 and H12 positively prepared, justified, effective and consistent with national planning policy?

- 3.30 Policies H5, H6, H8, H9, H10 and H12 are positively prepared because they support the delivery of a variety of housing to meet evidenced needs. They are justified by proportionate evidence referred to in the responses to Issue 2, Questions 1 to 8; and by consideration of reasonable alternatives in the Sustainability Appraisal Report (CSD-07b: pages 152 to 153, paragraph 6.132;

² [Houses in Multiple occupation](#) SPD, Exeter City Council, December 2023.

page 154, paragraph 6.137; page 157, paragraph 6.146 and 6.147; page 159, paragraphs 6.152 and 6.153; and pages 160 to 151, paragraphs 6.157 and 6.158).

- 3.31 Subject to the suggested modifications outlined in Issue 2, Question 11 below, the policies are effective because they are deliverable over the plan period, and are consistent with national policy because they reflect the evidenced housing needs of different groups in the community.

Q11. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 3.32 Suggested main modification SMM31 (CSD-03, page 14) is necessary in terms of test of soundness d) – consistent with national policy. By correcting a spelling mistake, it will ensure that policy H5 is consistent with the definition of a major site in the NPPF Glossary and the Planning Obligations PPG.
- 3.33 Suggested main modification SMM32 (CSD-03, page 14) is necessary in terms of test of soundness c) – effective. It is not feasible (effective) to enforce against a co-living units being used as self-contained homes. The modification will be effective at ensuring that co-living housing provides high quality communal living.
- 3.34 Suggested main modification SMM33 (CSD-03, page 14) is necessary in terms of test of soundness c) – effective: it will be effective in ensuring residents have access to good quality kitchens.
- 3.35 Suggested main modification SMM37 (CSD-03, page 15) is not necessary to make the plan sound. However, the modification will avoid unnecessary repetition because matters of residential amenity are covered in policy H16.
- 3.36 Suggested main modification SMM38 (CSD-03, page 16) is necessary in terms of test of soundness c) – effective. Management plans are an effective way to ensure supported housing is well managed and thereby of good quality.
- 3.37 Suggested main modification SMM39 (CSD-03, page 16) is necessary in terms of test of soundness c) – effective. The modification will make the policy effective at securing high quality cluster flats and studios, in terms of both functionality and design.
- 3.38 Suggested main modification SMM40 (CSD-03, page 16) is necessary in terms of test of soundness c) – effective. The modification is needed to clarify that PBSA schemes should include private car parking for blue badge holders only.
- 3.39 Suggested main modification SMM46 (CSD-03, page 18) is necessary in terms of test of soundness c) – effective. The modification will make the policy effective at securing high quality residential conversions and HMOs, in terms of both functionality and design.
- 3.40 Various other changes are suggested to the supporting text (CSD-03: page 57, SAMM24-SAMM26; pages 60-64, SAMM30-SAMM39; and pages 66-67, SAMM43-SAMM44). Whilst it is not considered that these changes are required for soundness, they do address concerns made by other parties and make the Exeter Plan more effective.

4. Issue 3: Custom and Self-Build Housing – Policy H7

Q1. What is the identified need for self-build and custom housebuilding in Exeter? How did the Council identify this need, and will it be met over the Plan period?

- 4.1 As shown in Topic Paper 2 (TOP-02: page 8, table 2), if the Plan period remains as 2021-2041, the identified un-met need (at 31 October 2024) for custom- and self-build (CSB) homes is 362 plots. If the plan period is modified to 2022-2042, the identified un-met need increases to 382 plots. The Council has answered all questions in Issue 3 on the basis of a 2022-2042 plan period (as per CSD-01: SMM1, page 3).
- 4.2 The methodology to identify the need is explained in Topic Paper 2 (TOP-02: pages 7 to 8, paragraphs 4.1 to 4.6). In summary, the need has been identified from robust evidence provided by the Council's CSB register. As explained in paragraphs 4.2 and 4.1 of TOP-02 (page 7), whilst PPG identifies additional sources of information that can be used to support evidence of need, the 2024 LHNA concludes that these additional sources are not reliable or just reflect data in local authority registers. Therefore, basing the assessment of need for CSB on the register is justified and proportionate.
- 4.3 The Council anticipates that the need for CSB plots in Exeter will be met over the Plan period. As shown in table 3 of TOP-02 (page 16), it will be met through:
- The continued development of CSB homes on small windfall sites: based on past trends, TOP-02 estimates that these sites could contribute c.183 CSB plots over the remaining plan period (see page 13, paragraph 5.5 and footnote 12 – please note that the figures in the final sentence of the paragraph are incorrect. Footnote 12 contains the correct figures).
 - Setting a target in policy H7 for developments of 20 or more homes to provide 5% serviced plots for CSB. Appendices B and C of TOP-02 estimate that allocated and windfall sites could respectively provide c.190 and c.34 CSB plots over the remaining plan period.
- 4.4 Table 3 (TOP-02) indicates that the evidenced need for CSB plots will not be met if the site size threshold for seeking 5% CSB plots is set at 50 or 100 homes.

Q2. How many self or custom build homes have been provided as a percentage of total output over the past 5 years?

- 4.5 Of CSB homes granted planning permission over the past 5 years, 39 have been completed. This equates to 0.98% of total net completions (3,963 homes) over that period. All these homes have been provided as windfall development, and the majority have comprised single-dwelling developments.

Q3. How many self or custom build homes will be delivered in Exeter given the minimum density of 50 dwellings per hectare recommended by the Exeter Density Study?

- 4.6 The Council estimates that the Plan's housing allocations and windfalls could deliver 407 CSB plots (183 plots from single-dwelling windfall developments; plus 190 plots on allocated sites; plus 34 plots on windfall sites) (see TOP-02: page 16).
- 4.7 Evidence that CSB plots can be delivered on schemes of 50+ dwellings per hectare is provided by:
- The Council's CSB register, which provides proportionate evidence that there is demand for custom-built terraces and apartments in Exeter (see TOP-02: pages 8 to 12, paragraphs 4.7 to 4.13).
 - Viability evidence that policy H7's plot percentage target is viable for the Plan's five strategic mixed-use brownfield allocations and other high density schemes, taking into account the Plan's other policy requirements (EVB-IF-01a: page 18, paragraph 4.6; page 22, paragraph 5.11; page 25, paragraph 6.9; page 28, paragraph 7.8; and page 33, paragraph 9.11).
 - Examples of custom-build terrace and apartment schemes delivered elsewhere in the country, via the 'customisable shell' or 'turnkey' development models (see EVB-H-25, EVB-H26 and EVB-H-27).
- 4.8 The Council expects that single dwelling windfalls developed at lower densities will continue to come forwards, helping meet the demand for detached CSB homes.

Q4. Are the requirements set out in Policy H7 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

- 4.9 The Council has suggested main modifications to policy H7 to ensure soundness (please see the response to Question 5 below). Question 4 has been answered in the context of the suggested modifications.
- 4.10 Policy H7 is justified and deliverable because it is based on robust and up-to date evidence of:
- The need/demand for CSB in Exeter (TOP-02: pages 7 to 12, section 4).
 - Viability evidence showing that the 5% target and threshold are generally viable for a range of sites, including brownfield (EVB-IF-01a: page 43, paragraphs 5.12, 5.14 and table 5.5).
 - The deliverability of custom-build apartments and terraced housing (EVB-H-25, EVB-H26 and EVB-H-27).
- 4.11 Policy H7 is also justified by consideration of reasonable alternatives in the Sustainability Appraisal Report (CSD07b: pages 155 to 156, paragraphs 6.141 to 6.142).

- 4.12 Policy H7 is consistent with national policy in paragraph 63 of the NPPF because it will enable delivery of CSB plots to meet need/demand in Exeter. It is also consistent with the Viability PPG: paragraph 6.41 of the Plan clarifies that 5% is a target subject to viability considerations, rather than a requirement.
- 4.13 The deliverability of plot percentage policies is evidenced in TOP-02 (page 14, paragraph 5.8 to 5.9).

Q5. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

- 4.14 Suggested main modification SMM34 (CSD-03, pages 14 to 15) is necessary in terms of tests of soundness b) and c) – effective and justified. It will ensure the 5% target is applied to all development proposals of 20 or more homes. This is justified by the evidence of need for CSB homes in Exeter.
- 4.15 Suggested modification SMM35 (CSD-03, page 15) is necessary in terms of test of soundness b) – effective. It will clarify that affordable housing will be sought on developments that include CSB housing, not just development that is solely for CSB housing.
- 4.16 Suggested modification SMM36 (CSD-03, page 15) is necessary in terms of tests of soundness a), c) and d) – positively prepared, effective and consistent with national policy. Criteria (a) to (d) are necessary to ensure CSB plots reflect evidenced needs, are serviced and are readily available to develop.
- 4.17 Various other changes are suggested to the supporting text (CSD-03: pages 58-59, SAMM27-SAMM29). Whilst it is not considered that these changes are required for soundness, they will make the Exeter Plan more effective.

5. Issue 4: Meeting the Needs of Gypsies and Travellers – Policy H11

Q1. What is the total need figure over the plan period? What is it based on and how has it been calculated? Is the Exeter City Council Gypsy and Traveller Accommodation Assessment and its methodology appropriate and sufficiently robust?

5.1 The total need figures over the Plan period are summarised in the Gypsy and Traveller Accommodation Topic Paper (TOP-03: page 6, table 1; page 7, table 3; and page 8, table 5; and page 9, paragraph 3,14). The figures are as follows:

- No permanent pitches are needed for households who meet the planning definition of Gypsies and Travellers in the 2023 Planning Policy for Traveller Sites (PPTS).
- Up to 1 permanent pitch is needed for an undetermined household, arising in 2033-2037.
- 5 permanent pitches are needed for households who do not meet the planning definition in the PPTS, arising across the plan period.
- No plots are needed for households who meet the planning definition of Travelling Showpeople in the PPTS.

5.2 The figures have been calculated by ORS, a highly experienced specialist consultancy. They are contained in the 2024 Exeter Gypsy and Traveller Accommodation Assessment (GTAA) (EVB-H-01e). The GTA was jointly commissioned with neighbouring authorities including Teignbridge District Council. The Teignbridge Local Plan has recently undergone examination and the Inspectors' post-hearing letter raised no concerns about the GTAA or its methodology³.

5.3 The GTAA methodology is appropriate and sufficiently robust, being consistent with national policy. This is explained in EVB-H-01e (pages 14 to, 23 paragraphs 3.1 to 3.54) and also in the Topic Paper (TOP-03: pages 3 to 10, section 3).

Q2. Taking into account the answer above, what is the total number of additional pitches required over the plan period to meet this need?

5.4 A total up to five additional permanent pitches for Gypsy and Traveller households are needed over the plan period.

³ Available at: [appendix-1-post-hearing-letter.pdf](#)

Q3. Does the Plan make suitable provision to meet identified needs? Will needs be met in full? Is there an over-reliance on windfall sites to meet these needs? If so, is this approach justified?

- 5.5 The GTAA (EVB-H-01e: pages 4-5, paragraphs 1.7 to 1.9) explains that, consistent with national policy, it is only the needs from households who meet the planning definition, and from undetermined households who subsequently demonstrate that they meet the definition, that should formally be considered as needs to be provided for as appropriate through site allocation / intensification / expansion policies in the development plan. The needs of households that do not meet the planning definition should be addressed as part of general housing need.
- 5.6 As regards the needs from households who meet the planning definition and from undermined households, the Topic Paper (TOP-03: page 11, paragraphs 4.3-4.4) explains that it is not realistic to allocate a site for up to one permanent pitch. Instead, policy H11 sets out criteria against which a planning application for windfall development can be determined, should the need arise. As such, the Plan makes suitable provision to meet this need.
- 5.7 As regards the need from households who do not meet the planning definition (5 pitches), the Topic Paper (TOP-03: page 12, paragraphs 4.6-4.7) explains that this accounted for as a component of the windfall allowance in policy H1. In addition, policy H11 enables this need to be met as windfall development. As such, the Plan makes suitable provision to meet this need.
- 5.8 As set out in the Topic Paper (TOP-03: pages 13-14), windfall pitches have been developed in Exeter over the past 20 years and, moreover, the Council will actively continue work to identify deliverable land to provide pitches (including on its own land). The Council does not consider that there is an over-reliance on windfalls sites to meet identified needs in full.
- 5.9 The Plan's approach is justified by:
- The low levels of evidenced need.
 - Evidence of past windfall delivery and the Council's ongoing work to identify windfall sites.

Q4. Has the Council identified any needs for transit site provision, and how will these needs be met?

- 5.10 As explained in the Topic Paper (TOP-03: pages 9-10, paragraphs 3.15-3.18; page 12, paragraph 4.9; and pages 13-14, paragraphs 5.1-5.4), the GTAA does not identify a need for transit site provision, but recommends that the partner local authorities (the Council; East Devon, Mid Devon and Teignbridge District Councils; and Devon County Council) undertake additional monitoring to help determine transit need across the sub-region, so that it can be addressed at a strategic level.
- 5.11 Since TOP-03 was completed, the partner authorities have been collecting the data recommended in the GTAA and have finalised a data sharing agreement so that the information can be collated to provide a robust picture of transit needs across the sub-region. In addition, to help meet these needs,

the Council is actively looking for a transit site on Council-owned land. This was considered at the meeting of the Council's Strategic Scrutiny Committee on 15 January 2026.

Q5. Does the Plan provide sufficient pitches to provide five-years' worth of supply?

- 5.12 The need for up to one permanent pitch will not arise until 2033-2037. As this is not within the next five years, nor within five-years following the anticipated date of Plan adoption, there is no five-year requirement. Therefore, the Plan does not identify pitches to provide five-years' worth of supply.

Q6. Is Policy H11 positively prepared, justified, effective and consistent with national planning policy as set out in paragraph 63 of the Framework?

- 5.13 Policy H11 is:

- Positively prepared because it seeks to meet the evidenced accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- Justified by proportionate evidence of need and consideration of reasonable alternatives, as explained in paragraphs 5.9-5.11 above.
- Effective because it enables evidenced needs to be met, as explained in paragraphs 5.5-5.9 and 5.11 above.
- Subject to suggested modifications SMM44 and SMM45 (see below), consistent with national policy in NPPF paragraph 63 and footnote 28 and the PPTS.

Q7. What is the justification for the suggested modifications to Policy H11? Why are they necessary for soundness?

- 5.14 Suggested modification SMM41 (CSD-03: page 17) is not necessary to make the plan sound. However, the modification will avoid unnecessary repetition because matters of residential amenity are covered in policy H16.
- 5.15 Suggested modification SMM42 (CSD-03: page 17) is necessary to meet test of soundness c) - effective. Management plans are an effective way to ensure Gypsy and Traveller accommodation is well managed and thereby of good quality.
- 5.16 Suggested modification SMM43 (CSD-03: page 17) is necessary to meet test of soundness d) – consistent with national policy. Development of sites for Gypsy and Traveller accommodation outside the urban boundary may be appropriate and increase opportunities for windfall development.
- 5.17 Suggested modification SMM44 (CSD-03: pages 17 to 18) is necessary to meet tests of soundness c) and d) – effective and consistent with national policy. The suggested modification will ensure that the latest planning definitions of Gypsies, Travellers and Travelling Showpeople are applied when planning applications for new pitches/plots are determined.

- 5.18 Suggested modification SMM45 (CSD-04: page 18) is necessary to meet test of soundness c) – effective. The grammatical correction will ensure the policy makes sense and is therefore effective.
- 5.19 Other changes are suggested to the supporting text (CSD-03: pages 65 to 66, SAMM41 to SAMM42). Whilst it is not considered that these changes are required for soundness, they do address concerns made by other parties and make the Exeter Plan more effective.

6. Issue 5: Residential Accommodation, Amenity and Healthy Homes – Policies H13 and H16

Q1. How would Policy H13 be effectively implemented?

- 6.1 Policy H13 clearly states the Council's priority to avoid a net loss of homes, for reasons set out in paragraph 6.74 of the Plan. Development Management officers have advised that it is helpful to have this priority clearly stated in policy, because it provides a strong policy basis for resisting housing loss. However, paragraph 6.74 shows the Council will consider relaxing the approach on a case-by-case basis, if warranted by other material considerations.

Q2. What is the justification for the requirement for Nationally Described Space standards (NDSS) in Policy H16?

- 6.2 Consistent with national policy in the Housing: Optional Technical Standards PPG (paragraph 018), the requirement is justified by proportionate evidence of need, viability and timing. A full explanation of the evidence is provided in the Housing Topic Paper (TOP-01: pages 39 to 42, paragraphs 9.1 to 9.25).

Q3. Are Policies H13 and H16 positively prepared, justified, effective and where relevant, consistent with national planning policy?

- 6.3 Policy H13 is:

- Positively prepared and consistent with NPPF paragraph 64, because it supports a strategy to meet Exeter's housing needs.
- Justified by the evidenced need for homes in Exeter, and the discounting of reasonable alternatives in the Sustainability Appraisal Report (EXM-02a: pages 164 to 165, paragraphs 6.171 and 6.172).
- Effective because it clearly states the Council's priority whilst allowing for site-specific considerations, as explained in the supporting text.

- 6.4 Policy H16 is:

- Positively prepared because it supports the Plan's strategy to provide good quality homes (Policy S1(1)).
- Justified by evidence, as explained in the Council's response to question 2 above.
- Effective: the NDSS requirement is viable (see EVB-IF-01a: paragraph 2.4) and it, alongside the policy's wider amenity requirements, is already applied by the Council without detriment to housing delivery.
- Consistent with national policy in NPPF (paragraphs 123 and 135 f)), the Housing: Optional Technical Standards PPG (paragraphs 018 to 020) and Government guidance on Healthy Homes⁴.

⁴ [Healthy Homes — a foundation for healthier and resilient communities - GOV.UK](https://www.gov.uk/government/consultations/healthy-homes-a-foundation-for-healthier-and-resilient-communities)

Q4. In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

6.5 The Council has not suggested any modifications to policies H13 and H16.

7. Issue 6: Accessible Homes – Policy H14

Q1. How has the requirement that 10% of affordable homes should be built to meet wheelchair user and accessible and adaptable standards, as set out in Policy H14, been established as part of the plan-making process? Is it based on robust, up to date evidence?

7.1 The Council has suggested main modifications to policy H14 to ensure soundness (please see the Council's response to Question 5 below). Question 1 is answered in the context of the suggested modification.

7.2 The Housing Topic Paper (TOP-01: pages 37 and 38, paragraphs 8.1 to 8.10) explains that the requirements in policy H14 are based on:

- The 2024 Exeter LHNA, which identifies a need for at least 11% of affordable housing to be wheelchair accessible (EVB-H-01a: page 89, paragraph 7.78).
- The LPVA (EVB-IF-01a: page 33, table 4.13; and page 35, paragraph 4.37) and LPVA-A (EVB-IF-01b: page 12, paragraph 2.29) which consider the costs associated with building affordable and market homes to M4(3) and M4(2) standards, and show that the costs and the requirements of policy H14 have been applied when viability testing the Plan.
- Emerging Government policy to mandate M4(2) as a minimum requirement for all new homes. The proposal was confirmed by the Parliamentary Under Secretary (MHCLG) on 5 February 2025.

7.3 As such, the requirements in policy H14 are based on robust and up-to-date evidence of need, viability, and future Government policy.

Q2. Based on the number of housing sites allocated in the Local Plan (without planning permission) how many wheelchair adaptable dwellings are expected to be provided? How does this compare to the identified need?

7.4 The Council expects that up to c.93 affordable wheelchair user homes will be provided through site allocations (without planning permission or a resolution to approve planning permission). This figure has been calculated by applying policy H14's M4(3) to the total number of affordable homes expected to be delivered on allocated sites. All these homes will be wheelchair adaptable, unless, as explained in paragraph 6.78 of the Plan, the Council identifies that there is a need for homes to be provided as wheelchair accessible at planning application stage.

7.5 In addition to these 93 homes, the Exeter Plan Housing Trajectory (EVB-H-03: page 5) includes:

- 34 affordable wheelchair user homes in the completions figures.
- 14 affordable and 40 market wheelchair user homes in the permissions figures.

- 7.6 Therefore, the Council expects the Plan to deliver a total of up to 141 affordable wheelchair user homes and 40 market wheelchair user homes. This is 181 wheelchair user homes in total.
- 7.7 The 2024 Exeter LHNA identifies a total need for 150 additional market wheelchair user dwellings and 340 additional affordable wheelchair user dwellings between 2021 to 2041 (EVB-H-01a: page 89, figure 70). This is 490 wheelchair user homes in total. These figures represent the combined need for wheelchair adaptable and wheelchair accessible dwellings. The figures will be largely unaffected if the plan period is modified to 2022-2042.
- 7.8 Therefore, the Council expects that the Plan will meet:
- Around 41% of the evidenced need for affordable wheelchair user homes ($141/340 \times 100$).
 - Around 27% of the evidenced need for market wheelchair user homes ($40/150 \times 100$).
- 7.9 Whilst the Plan will not meet the identified need for wheelchair user homes (including wheelchair adaptable homes), aforementioned testing in the LPVA and LPVA-A shows that it is not viable to set higher M4(3) thresholds in policy H14. However:
- Additional wheelchair user homes may be delivered through further work by the Council to provide for more affordable housing (see TOP-01: pages 30 and 31, paragraph 5.23).
 - The 40 market wheelchair user homes secured by the Council to date have been offered by developers in the absence of a specific policy requirement. Therefore, it is possible that additional market wheelchair user dwellings may be provided during the plan period.
- Q3. What is the justification for the thresholds in Policy H14 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?**
- 7.10 Please see the Council's response to Issue 6, Question 1 above, which also answers these questions.
- 7.11 The policy thresholds are also justified by consideration of reasonable alternatives in the Sustainability Appraisal Report (EXM-02a: pages 165-166, paragraphs 6.174 and 6.175).
- Q4. Does Policy H14 consider site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable, as required by the PPG12?**
- 7.12 Paragraph 6.79 of the Plan is clear that site specific factors relating to feasibility and viability will be considered, as required by the Housing: Optional Technical Standards PPG.

**Q5. What is the justification for the suggested modifications to Policy H14?
Why are they necessary for soundness?**

- 7.13 Suggested modification SMM47 (CSD-03: page 18) is necessary to meet test of soundness b) – justified. The main purpose of the modification is to specify that at least (rather than only) 10% of affordable homes should be built to M4(3) standard. This is justified by the evidenced need for affordable wheelchair accessible housing (which is greater than 10%: see paragraph 7.2 above).

8. Issue 7: Housing Density and Mix – Policy H15

Q1. Is Policy H15 sufficiently clear in relation to the types of housing to be provided and the housing mix expected? Is it effective in these regards?

- 8.1 Policy H15 is sufficiently clear to ensure delivery of a mix of housing sizes. It would not be effective to set a mix in the policy: the appropriate mix will depend upon local context, the local housing mix, and latest evidence of need.
- 8.2 Policies H4 to H12 clearly support the provision of a wide range of house types to meet evidenced needs; it is unnecessary to repeat this support in policy H15. The Council's aim is to avoid house types becoming over-concentrated in a locality. The Council has suggested a main modification to policy H15 to address this (CSD-03: page 20, SMM50).
- 8.3 The Council has also suggested a main modification to delete policy H15(c) (CSD-03: page 19, SMM49). This is because the impact of the proposed tenure mix of the development on housing mix is already covered by policy H15(a).
- 8.4 Subject to these modifications, the Council considers that policy H15 is sufficiently clear to effectively deliver an appropriate range of housing types.

10. *The Exeter Density Study recommends densities between 50 and 150 dwellings per hectare for residential development depending on locational and other 'drivers of density' such as increasing the population within the city centre and proximity to public transport nodes and strategic cycle routes.*

Q2. What are the implications of this drive towards higher densities in Exeter? Would this approach lead to more tall buildings within the city? If so, should the Plan include a tall buildings policy? How has the Exeter Skyline Study been considered in formulating this approach?

- 8.5 The drive towards higher densities will ensure that Exeter's housing needs are met in a way that:
- Makes efficient use of land, consistent with NPPF paragraph 123.
 - Helps minimise the need to travel, congestion and pollution, by optimising the number of new homes located close to the city centre and key transport hubs and other locations that are well served by public transport or within walking or cycling distance of services, facilities and employment within the city, consistent with NPPF paragraph 109.
 - Protects the city's valued landscape setting, evidenced in the Exeter Plan Policy NE1 Landscape Setting Areas – Valued Landscape Assessment (EVB-NE-02).
 - Allows a mix of housing types and sizes to be provided across the city to meet the housing requirement and help meet assessed needs, consistent with NPPF paragraphs 60, 63 and 69. The Exeter Density Study shows

that 50dph can be achieved with good quality development comprising terraced homes and townhouses, whilst c.150dph (plus) can be achieved with 5 to 6 storey apartment blocks (EVB-H-08: pages 11, 13 and 16 to 18). This is also shown by design codes L01 and L02 in the Liveable Water Lane Supplementary Planning Document (EVB-S-03: pages 68 and 69). The examples in the Exeter Density Study include market housing, affordable housing, homes for older people and purpose-built student accommodation.

- 8.6 Given these examples, the Council does not expect the drive to increase densities to lead to a significant increase in proposals for tall buildings. However, if a tall building is proposed, its impact on historic assets, views, local character and environmental quality can be effectively considered via policies HH1, HH2, HH5, D1, HW2 of the Plan. A specific tall buildings policy is unnecessary.
- 8.7 The Exeter Skyline Study (EVB-HH-02: pages 42 to 115) identifies views that contribute to the city's sense of place and character. The Plan's housing capacities for East Gate, Red Cow, Exe Bridges Retail Park and South Gate take into account the importance of protecting and/or enhancing these views, as shown by the Exeter Plan Strategic Allocations: Views, Heights and Capacity Study (EVB-HH-02: pages 7 to 11, 21 to 23, 25 to 31 and 39 to 52). The Council has suggested main and additional minor modifications to the Plan to ensure the views are considered when determining planning applications for tall buildings (SMM90, page 39; SAMM83, page 89; and SAMM91, page 98).

Q3. Is Policy H15 sufficiently clear in relation to what is expected of the density of development and what the implications of higher densities could potentially be? Should it include a minimum density standard for city and town centres and other locations that are well served by public transport as per paragraph 129 of the Framework?

- 8.8 Policy H15 is clear that developments should achieve optimal densities that consider site-specific context. Paragraph 6.81 of the Plan is clear that optimising density is about making the most efficient use of land so that it is appropriate for the site and surrounding area. As such, the Council considers that policy H15 is sufficiently clear about density expectations. Additional supporting text could be added to explain the implications of optimal densities – for example, low or no private parking provision on sites located in the city centre or close to transport hubs.
- 8.9 Policy H15 does not include minimum density standards for the city centre, local centres and other locations that are well served by public transport because:
- The appropriate density will depend upon site-specific circumstances.
 - The density of major developments recently permitted in these locations far exceeds the minimum densities recommended in the 2021 Exeter Density Study (EVB-H-08: page 22). In terms of planning permissions at 1 April 2025, major developments in city centre locations achieve densities of between c.180dph and c.2,160dph; whilst major developments in the local centres and other locations well served by public transport achieve

densities of between c.100dph and c.250dph. This evidence indicates that there is no need for minimum density standards.

Q4. Is the delivery of Policy H15 over-reliant on the provision of flatted accommodation? How much of this type of accommodation been delivered in the city in the last five to ten years?

8.10 The delivery of policy H15 is not over-reliant on the provision of flatted accommodation because:

- Outside the city centre, local centres and other locations well served by public transport, optimal densities will generally comprise the development of houses (terraces and townhouses), not flats.
- The housing capacities of 20 sites allocated in policy H2 reflect non-flatted development, or a mix of flatted and non-flatted development⁵. This includes the largest allocation at Water Lane, where it is expected that non-flatted housing will be delivered in areas outside flood zones 2 and 3. Overall, the allocations are expected to deliver a good mix of house types.
- The Exeter Housing Market Insights Report shows a clear market opportunity for additional flats in the city, and an increasing appetite for flatted accommodation (EVB-H-12: pages 12 and 21).

8.11 Just under 700 residential flats have been delivered in Exeter over the last five years, including just over 550 residential flats on major sites. They include a range of market, affordable, build to rent (including co-living) and older persons' homes. In addition, c.530 student studio and cluster flats have been delivered. Overall, the figures demonstrate a strong recent track record of flatted development in the city, and good demand for this type of accommodation.

Q5. Is Policy H15 positively prepared, justified, effective and consistent with national planning policy?

8.12 The Council considers that policy H15 is:

- Positively prepared because it provides for housing densities that will ensure Exeter's objectively assessed need is met.
- Justified by proportionate evidence of appropriate and deliverable densities provided by the LDA Density Study (EVB-H-08), Exeter Plan Strategic Allocations: Views, Heights and Capacity Study (EVB-HH-03), the Exeter Skyline Study (EVB-HH-02) and the Exeter Housing Market Insights Report (EVB-H-12). It is also justified by the LPVA which shows that higher density typologies are viable in all areas of Exeter (EVB-IF-01a: pages 41 to 43, paragraphs 5.9 to 5.11) and by the LPVAA which

⁵ Water Lane, Land at Old Rydon Lane, St Bridget Nurseries, Whipton Community Hospital, Land at Newcourt Road, Land adjoining Silverlands, Land at Topsham Golf Academy, Land to the west of Newcourt Road, Land to the east of Newcourt Road 2, Clifford Close, Gipsy Hill Hotel, Land behind 66 Chudleigh Road, East of Pinn Lane, Hessary, Land south of Gipsy Hill Lane, Garages at Lower Wear Road, Newbery Car Breakers, Land rear of Beacon Lane Shops, Lancelot Road, and Land at Taunton Close.

shows that the Plan's assumed densities for strategic brownfield and large scale site allocations are viable (EVB-H-01b: pages 17 to 33, paragraphs 4.1 to 9.11);

- Effective, based on the aforementioned evidence.
- Consistent with national policy in NPPF paragraphs 128 to 130 (subject to the modification listed in the Council's response to question 6 below), because it will avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.

Q6. What is the justification for the suggested modifications to Policy H15? Why are they necessary for soundness?

- 8.13 Suggested modification SMM48 (CSD-03: page 19) is necessary to meet test of soundness c) – effective. By clarifying considerations relating to local context, it will ensure policy H15 is effective.

9. Summary

- 9.1 This hearing statement has been prepared by Exeter City Council in response to questions asked in relation to Matter 7 of the Exeter Plan Examination.
- 9.2 All questions associated with the full range issues for Matter 7 have been answered.

APPENDIX A: Major brownfield planning applications determined over the past 5 years, where affordable housing contributions have been secured or negotiated (excludes Build to Rent schemes)

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
Royal Clarence Hotel, Cathedral Yard	25/0895/FUL	Redevelopment of the Royal Clarence, to include 25 new residential dwellings on the upper floors with part residential on the ground and part basement floor. Commercial on the remaining ground and basement floor as a public house and restaurant.	25	Financial contribution in lieu of on-site provision	Committee resolution to approve, subject to S106 Agreement
Hurst Road Almshouses, 2-24 Fairpark Road	18/0598/FUL	Demolition of existing dwellings and redevelopment of the site to create 31 nos. one and two bedroom almshouse flats together with landscape enhancement to the adjacent Bull Meadow Park (revised scheme).	31	100%	Not started
The Old Coal Yard, Exmouth Junction	22/0817/RES	Approval of landscaping reserved matter for phase 2 of outline planning permission ref. 22/0037/VOC for the construction of up to 400 residential dwellings (Class C3), 65 senior living with care units (Class C2), new public open and green spaces, access road, refurbishment and extension of locally listed former water tower, and associated works.	165	100%	Under construction
50 Topsham Road	20/1614/VOC	Variation of drawings referenced in condition 2 of planning permission 19/1436/VOC. Amendments include: addition of balconies to Blocks A and D;	146	28%	Under construction

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
		amended external, parking, bins and cycle store layout; change to single entrance core to Block D; amendment of Affordable Housing arrangement in Blocks B and C.			
Buckerell Lodge, Topsham Road	22/0770/FUL	Construction of 62 Retirement Apartments (Category II Type Sheltered Housing) with communal facilities and car parking.	62	Financial contribution in lieu of on-site provision	Under construction

APPENDIX B: Major greenfield planning applications determined over the past 5 years, where affordable housing contributions have been secured or negotiated (excludes Build to Rent schemes)

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
Land south of Tithebarn Way	22/1656/FUL	Application for the approval of reserved matters pursuant to outline permission 18/1145/OUT for residential development of up to 80 dwellings (all matters reserved except access).	68	100%	Under construction
Hill Barton Farm, Hill Barton Road	21/1054/RES	Approval of reserved matters of layout, scale, appearance and landscaping of planning permission ref. 19/1375/OUT - outline application for up to 200 dwellings.	195	35%	Under construction
Land adjoining Exeter Road, Topsham	21/1435/RES	Approval of reserved matters of layout, scale, appearance and landscaping, and Discharge of Conditions 14 (Pedestrian/Cycle Path connection to adjoining land) and 18 (Building Regs standard) of Outline Planning Permission Ref: 19/1465/OUT.	24	35%	Completed
Land at Aldens Farm East, Chudleigh Road	21/0434/FUL	Approval of Reserved Matters of appearance, landscaping, layout and scale (206 dwellings) in respect of Planning Permission Reference 15/0640/OUT granted 1 March 2021	206	35%	Under construction
Land at Ikea Way, Ikea Way	21/0496/FUL	Construction of 184 dwellings, means of access, public open space and associated infrastructure (Re-submission of refusal 19/1647/FUL - Revised Plans).	184	35%	Under construction

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
Land for residential development at Hill Barton Farm, Hill Barton Road	21/1701/OUT	Outline planning application for construction of up to 285 dwellings with all matters reserved for future consideration (access, appearance, landscaping, layout and scale).	285	35%	Reserved matters application pending consideration
Land adjacent to Newcourt Road, Topsham	23/0885/RES	Approval of layout, scale, appearance and landscaping reserved matters pursuant to planning permission ref. 21/1940/OUT - Outline planning application for demolition of existing structures and construction of up to 30 no. residential units and associated infrastructure.	30	33%	Under construction
Land at Retreat Drive, Topsham	22/0268/FUL	Build apartment block of 17 no. units, including gymnasium, car parking and cycle storage, communal space, vehicular access and all associated development.	17	26%	Implemented
Yeomans Gardens, Newcourt Road, Topsham	22/0269/FUL	Residential development of 16 dwellings (including 35% affordable housing), access from Newcourt Road and associated works.	16	35%	Completed
Land off Pendragon Road	22/0511/OUT	Outline planning application for a residential development of up to 100 dwellings and associated infrastructure (All matters reserved except access)	100	50%	Reserved matters application pending consideration
Land at Aldens Farm West, Shillingford Road	22/1454/RES	Reserved Matters application seeking permission for 182 dwellings and associated infrastructure, layout, scale, appearance and landscaping relating to the Residential development approved under application 15/0641/OUT (Revised plans)	182	30%	Under construction
Land south west of Blakeslee Drive	24/0317/RES	Approval of access, layout, scale, appearance and landscaping reserved matters pursuant to planning	40	35%	Under construction

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
		permission ref. 23/0584/OUT and additional details including lighting, drainage and bat/bird boxes.			
Land off Spruce Close and Celia Crescent	23/1174/RES	Approval of reserved matters of layout, scale, appearance and landscaping pursuant to planning permission ref. 20/0538/OUT for the erection of 93 dwellings with associated access, drainage, open space, play area and landscaping.	93	35%	Under construction
Land Known As Seabrook Orchards Phase 3 And Seabrook Square (Formerly Land To North Of Topsham Town AFC Ground), Topsham Road	23/1237/RES	Reserved Matters Application (Pursuant to the Outline Planning Permission Ref. 11/1291/OUT) for the approval of the layout, scale, appearance of buildings, means of access to buildings and landscaping for Phase 3 (188 homes including affordable housing and associated infrastructure) and Seabrook Square (13 affordable apartments, a flexible community building, parking and landscape and play area).	201	30%	Under construction
Land at Redhills, Exwick Lane	24/0531/RES	Reserved matters application (appearance, landscaping, layout and scale) pursuant to outline planning permission 20/1380/OUT for residential development of 80 homes and associated infrastructure.	80	35%	Under construction
Apsham Grange, Lan on the west side of Clyst Road, Topsham	24/0253/RES	Reserved matters application for approval of appearance, landscaping, layout, scale, and access pursuant to phased outline planning application 21/0894/OUT for the construction of up to 100 dwellings and associated infrastructure (all matters reserved).	100	35%	Under construction

Site	Planning Application	Development description	No. of homes	% of affordable homes secured / delivered	Status at February 2026
Topsham Golf Academy, Exeter Road, Topsham	24/0785/FUL	Demolition of existing buildings/structures. Proposed residential development of 54 no. residential units, including affordable housing, plus open space, landscaping, car parking, drainage, vehicular access, internal roads and all associated infrastructure and development	54	35%	Not started

APPENDIX C: Anticipated delivery of affordable homes (AH)

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
Completions in 2022/23 to 2024/25			
Land at Sandrock	14	0	
Land at Hill Barton adjacent to the boundary of the Met Office	16	0	
Land known as Monkerton Farm on western side of Cumberland Way	26	0	
Land at Home Farm (Phase 2), Church Hill	7	0	
The Vines, Gipsy Lane	8	0	
Exeter Golf and Country Club Practice Ground, Land to the south of Newcourt Road	9	0	
Former Exwick Middle School, Higher Exwick Hill	43	0	
Land at Clyst Road Phase 2, Topsham	5	0	
Former Foxhayes Infant School, Gloucester Road	31	0	
Land west of Ringswell Avenue	60	0	
Land between 106 Hamlin Gardens & 65 Carlyon Gardens	21	0	
Land adjoining Exeter Road, Topsham	8	0	
Land to the north of Arran Gardens, Hollow Lane and Higher Furlong	15	0	
Land at Brookhayes, Pilton Lane	10	0	

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
Exmouth Junction Gateway, Prince Charles Road	10	0	
Yeomans Gardens, Newcourt Road, Topsham	5	0	
Subtotal	288	0	
Sites with planning permission / resolution to approve at 1 April 2025			
Land at Pinhoe Quarry, Harrington Lane	51	14	
Seabrook Orchards (formerly land to north of Topsham Town AFC Ground) (Phase 2)	34	27	
Seabrook Orchards (formerly land to north of Topsham Town AFC Ground) (Phase 3 and Seabrook Square)	0	61	
Tithebarn Green at Monkerton	62	22	
Land for residential development at Hill Barton Farm, Hill Barton Road	0	96	
Land for residential development at Hill Barton Farm, Hill Barton Road	0	69	
Land to the south of Tithebarn Way, Tithebarn Way	0	68	
Bricknells Bungalow, Old Rydon Lane	0	8	
Exeter Royal Academy for Deaf Education, Topsham Road	11	30	
Land at Clyst Road (Phase 1)	44	10	
Land off Pulling Road, Pinhoe	9	1	
Whipton Barton House, Vaughan Road	0	55	

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
The Old Coal Yard, Exmouth Junction, Mount Pleasant Road (Phase 1)	0	57	
The Old Coal Yard, Exmouth Junction, Mount Pleasant Road (Phase 2)	0	165	
The Old Coal Yard, Exmouth Junction, Mount Pleasant Road (Phase 3)	0	18	
Aldens Farm East, Land between Chudleigh Road and Dawlish Road	39	23	
Land at Broom Park Nurseries and Five Acres, Exeter Road, Topsham	8	12	
The Harlequin Centre, Paul Street	0	0	
Land At Aldens Farm West, Shillingford Road	0	54	
Clifton Hill Sports Centre, Clifton Hill	0	71	Based on pre-application 25/0069/MPS, the Council assumes this will be a 100% affordable rent extra care scheme of 71 units
Hurst Almshouses, 2-24 Fairpark Road	0	19	
Land at Redhills, Exwick Lane	0	28	
Royal Clarence Hotel, Cathedral Yard	0	0	
Land at Ikea Way, Ikea Way	0	64	
Land off Spruce Close and Celia Crescent	0	32	
Apsham Grange, Land on the west side of Clyst Road, Topsham	0	35	
Buckerell Lodge Hotel, Topsham Road	0	0	
Land adjacent to Newcourt Road	0	10	

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
Haven Banks Retail Park, Water Lane	0	57	
Land at Summerland Street	0	15	
Exeland House, Tudor Street	0	4	
Land off Pendragon Road	0	50	
Land southwest of Blakeslee Drive	0	40	
Water Lane South	0	0	
Subtotal	258	1,215	
Exeter Plan Allocations			
Strategic mixed use brownfield sites			
Water Lane - Water Lane South	0	0	
Water Lane - Haven Banks Retail Park	0	0	
Water Lane - Isca House	0	0-76-101	AH provision could be 0% (0) if site is developed for PBSA; or 15% (76) under policy H4; or 20% (101) under policy H5. Minimal Vacant Building Credit (VBC) will apply.
Water Lane - Vulcan Estate	0	0-45-60	AH could be 0% if site is developed for PBSA; or 15% under policy H4; or 20% AH under policy H5. Result adjusted to consider the VBC.
Water Lane - 61 and 62 Haven Road	0	5-7	AH could be 15% under policy H4; or 20% AH under policy H5. The site is Council-owned and is therefore unlikely to be developed for PBSA. Minimal VBC will apply.
Water Lane - Canal Office and Sea Cadets	0	3-4	AH could be 15% under policy H4; or 20% AH under policy H5. The site is Council-owned and is therefore unlikely to be developed for PBSA. Minimal VBC will apply.

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
East Gate - City Point	0	18-24	AH could be 15% under policy H4; or 20% AH under policy H5. The site is Council-owned and is therefore unlikely to be developed for PBSA. Result adjusted to consider the VBC.
East Gate - Civic Centre	0	0	VBC will likely apply: the site is largely occupied by 4-5 storey buildings, so it is assumed there will be no AH requirement.
East Gate - Manor Court	0	0	VBC will likely apply: the site is largely occupied by 4-5 storey buildings, so it is assumed there will be no AH requirement.
East Gate - Pyramids, John Hannam House and Eaton House	0	92	The Council expects development to comprise a 100% AH development by the landowner (Guinness Trust).
East Gate - Clarendon House	0	0	Based on planning application 25/1082/FUL, it is assumed this will be a 100% PBSA development with no AH.
Red Cow - Red Cow North	0	0-31-42	AH could be 0% if site is developed for PBSA; or 15% under policy H4; or 20% AH under policy H5. Minimal VBC will apply.
Red Cow - University of Exeter land	0	0	The Council expects development to comprise a 100% PBSA development, which will not deliver AH.
Exe Bridges Retail Park	0	0-30-40	AH could be 0% if site is developed for PBSA; or 15% under policy H4; or 20% AH under policy H5. Result adjusted to consider the VBC.
South Gate	0	12-16	The site is Council-owned and is therefore unlikely to be developed for PBSA. Minimal VBC will apply.
SUBTOTAL	0	130-386	
Predominantly residential sites: large scale			
Land at Old Rydon Lane	0	125	35% AH under policy H4.
St Bridget Nurseries	0	123	35% AH under policy H4.
Heavitree Road Police Station	0	44	Planning application 25/0676/FUL proposes 20% of the co-living units (83) as AH. $83/1.9 = 44$ units.

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
Mary Arches Mutli-Storey and Surface Car Park	0	0	Based on current planning application 25/0781/FUL, it is assumed the site will be developed for Build to Rent housing with 0% APR due to VBC.
Whipton Community Hospital	0	10	15% AH under policy H4. Result adjusted to consider the VBC.
SUBTOTAL	0	302	
Predominantly residential sites: major			
Rougemont Switching Centre	0	0-4	Based on landowner's Regulation 19 representation, it is assumed the site will deliver 20% AH under policy H5; or 0% AH as a PBSA scheme. Result adjusted to consider the VBC.
Land at Newcourt Road, Topsham	0	18	35% AH under policy H4.
Land adjoining Silverlands	0	19	35% AH under policy H4.
Land to the west of Newcourt Road, Topsham	0	20	35% AH under policy H4.
Land at Topsham Golf Academy	0	19	35% AH under policy H4.
Land at Exeter Squash Club	0	0	Based on landowner's Regulation 19 representation, it is assumed this will be a 100% PBSA development with no AH.
Land and buildings at Victoria Street	0	9	Based on recent and current pre-applications 24/0979/MP and 25/1544/MP and refused planning application 23/0949/FUL, it is assumed this will be a Build to Rent development with 20% AH under policy H5. Minimal VBC will apply.
12-31 Sidwell Street	0	0	15% AH under policy H4, However, result adjusted to consider the VBC
Land to the east of Newcourt Road 2, Topsham	0	9	35% AH under policy H4.
Clifford Close	0	33	A City Council HRA site, so 100% AH.

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
Gipsy Hill Hotel	0	4	15% AH under policy H4. However, result adjusted to consider the VBC.
Unit 1 Nightclub, Summerland Street	0	0-4-6	AH could be 0% if site is developed for PBSA; or 15% under policy H4; or 20% AH under policy H5. Results adjusted to consider VBC.
Land behind 66 Chudleigh Road	0	9	35% AH under policy H4.
Chestnut Avenue	0	24	A City Council HRA site, so 100% AH.
East of Pinn Lane	0	4	35% AH under policy H4.
Land at Matford Lane (2)	0	9	35% AH under policy H4.
Hessary, Hollow Lane	0	6	35% AH under policy H4. Minimal VBC will apply.
Fever and Boutique, 12 Mary Arches Street	0	0-2	AH could be 0% if site is developed for PBSA; or 15% under policy H4; or 20% AH under policy H5. Results adjusted to consider VBC.
Land south of Gipsy Hill Lane	0	5	35% affordable housing under policy H4.
Garages at Lower Wear Road	0	12	A City Council HRA site, so 100% AH.
SUBTOTAL	0	200-212	
Residential sites: minor			
Newbery Car Breakers	0	0	Site is below the policy H4 and policy H5 thresholds.
Lancelot Road	0	7	A City Council HRA site, so 100% AH.
Land rear of Beacon Lane shops	0	6	A City Council HRA site, so 100% AH.
Land at Taunton Close	0	5	A City Council HRA site, so 100% AH.
91-97 Wonford Street	0	5	A City Council HRA site, so 100% AH.

Address	AH provision: 2022/23 to 2024/25	Anticipated AH provision: 2025/26 to 2041/42	Additional comments
SUBTOTAL	0	23	
TOTAL AH PROVISION	2,416-2,684 (average of 2,640)		
TOTAL AH NEED: 2022-2042	3,821		
% OF AFFORDABLE HOUSING NEED EXPECTED TO BE MET FROM AS106 CONTRIBUTIONS OVER THE PLAN PERIOD	67%		

APPENDIX D: Email from University of Exeter

From: [REDACTED]
Sent: 27 January 2026 13:52
To: [REDACTED]
Subject: Re: Provision of wheelchair-user accommodation for students

Hi Katharine,

Many thanks for your email:

The University of Exeter is committed to promoting and implementing equality of opportunity. The University aims to support individuals who, due to disability, a long-term medical condition, sensory or physical impairment, need accessible campus based accommodation.

The University will always aim to house wheelchair users in university campus accommodation, as we see this as a critical requirement for ensuring equal access to higher education under the [Equality Act 2010](#).

The University campus accommodation provision includes purpose-built rooms with necessary features such as wet rooms, lowered kitchen worktops, and enough space for specialised equipment such as hoists. In addition to this and with sufficient notice as outlined within the application process, the University will agree reasonable adjustments and modifications to existing accommodation to meet individual requirements.

Proximity to campus is essential for students with mobility challenges, as it eliminates the logistical barriers and cost of navigating off-campus transport. Furthermore, onsite living enables vital social integration and prevents isolation, allowing students to participate in campus life on equal terms with their peers.

Please let me know if you require any further information.

Kind regards,

[REDACTED]

[REDACTED]

Deputy Director
Commercial, Residential & Campus Services
University of Exeter

APPENDIX E: Examples of privately-managed PBSA schemes

Scheme	Total no. of PBSA bedspaces	Wheelchair adaptable PBSA bedspaces
Land at Glenthorne Road	237	7
The Depot, Phase 1	599	4
The Depot, Phase 2	114	4
1 Mary Arches Street	31	2
Beech Hill House, Walnut Gardens	166	9
City Arcade, Fore Street	64	4
74 Paris Street	107	2
23-26 Mary Arches Street	127	4
Clifford House, Stadium Way	312	4