

Exeter Plan 2021-2041

Publication Stage (Regulation 19)

Representation Form

Ref:

**(For official
use only)**

Name of the Local Plan to which this representation relates: Exeter Plan 2021-2041

Please return to Exeter City Council, Local Plans Team, Paris Street, Exeter, EX1 1JN, upload onto our consultation portal at <https://exeterplanpublication.commonplace.is/> or email to planning.policy@exeter.gov.uk by **11:59 pm on 6 February 2025**.

This form has two parts:

Part A – Personal Details: Needs to be completed only once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal details

1. Personal details*

*If an agent is appointed, please complete only the Title, Name and Organisation (if application) boxes below but complete the full contact details of the agent in section 2.

Title

Mr.

First Name

Gary

Last Name

Nixon

Job Title (where relevant)

Organisation (where relevant)

Nixon Homes Limited

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone number

E-mail address

2. Agent's details if applicable

Title

Mr.

First Name

Joe

Last Name

Morgan

Job Title (where relevant)

Assistant Planner

Organisation (where relevant)

DPP Planning

Address Line 1

Desg, 9-11

Line 2

Penhill Road

Line 3

Pontcanna

Line 4

Cardiff

Post Code

CF11 9PQ

Telephone number

E-mail address

Part B – Representation

Please use a separate sheet for each representation

3. To which part of the Exeter Plan does this representation relate?

Paragraph

Policy

Policies Map

4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes

No

4 (a). If yes, and you wish to support the legal compliance of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

Whilst we consider the plan to be legally compliant, we contend that amendment are necessary to make the plan precise and consistent,

4 (b). If no, please give details of why you consider this part of the Exeter Plan is not legally compliant. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/A

4 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan legally compliant, in respect of any legal compliance matters you have identified at 4(b) above. You will need to say why each modification will make this part of the Exeter Plan legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/A

5. Do you consider that this part of the Exeter Plan is Sound?

Yes

No

5 (a). If yes, and you wish to support the soundness of this part of the Exeter Plan, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

N/A

5 (b). If no, please give details of why you consider this part of the Exeter Plan is unsound. Please be as precise as possible.
(Continue on a separate sheet if necessary)

Chapter 6: Homes is supported in terms of the overall strategy for consideration of housing need. We are supportive of the approach which includes consideration of all forms of residential development as contributing to overall housing need, including PBSA and Co-Living developments. Notwithstanding this, the basis on which the Local Plan accounts for the contribution of these forms of residential accommodation make to the housing need requires clarification. We set out more details on this below.

Policy H2: Housing Allocations and Windfalls (Strategic Policy). We support the inclusion of the Heavitree Road Police Station (Site Reference: 104) as an allocated site within the draft Local Plan. The site is a highly accessible, located adjacent to the Exeter university St. Luke's Campus and has the capacity to make a significant contribution towards fulfilling housing need within the city. Furthermore, the site constitutes brownfield land within the settlement boundary which can be delivered at sufficient density and scale to fulfil this allocation.

On the basis that where the Local Plan refers to unit numbers, it can be read as 'equivalent' to residential units, the proposed allocation of 350 homes at Site Reference 104 is supported as this confirms that the site can accommodate a larger number of units if they were in the form of PBSA/Co-Living units rather than pure residential homes.

Notwithstanding this general support for the allocation, we contend that the policy is unsound on grounds of justification, efficacy and consistency with national policy as set out within Paragraph 35 of the NPPF. Primarily, Policy H2 does not make clear how the figure of 350 is arrived at in terms of housing delivery and despite paragraphs within subsequent policies of the plan, it should be made more explicit that this figure is a minimum number of units and that it can be achieved by delivery of the equivalent of 350 homes through development of other housing types.

In terms of justification, the approach to how the ratios for this equivalence between housing types are calculated is questioned. The use of both Housing Delivery Test Rulebook as well as Planning Practice Guidance to define appropriate ratios is considered to be unjustified and contradictory. Purpose Built Student Accommodation is a distinct housing type and should be considered as such within the plan. Consideration of student studios and student cluster bedrooms as contributing to different equivalencies in terms of housing need at Paragraph 6.63 is unjustified and ineffective in terms of administering the plan. This is particularly so given that student accommodation and its ongoing use is generally homogenous in terms of housing delivery.

Utilising two sets of guidance for calculation of equivalent ratios is also questioned in terms of efficacy, as this will lead to issues with the implementation of these policies following adoption of the plan. It is not made clear within the plan in which case each guidance is used and why, which is questioned in terms of justification and efficacy, as this will cause confusion for developers and officers. Therefore, we assert that the most recent Housing Delivery Test Rulebook should be the sole basis for calculation of these ratios to ensure the effective implementation of the plan. This will provide certainty for users of the plan and ensure the plan can be used effectively as well as remaining consistent with changing trends on acceptance of the contribution this form of housing can make to meeting demands.

Policy H6: Co-living Housing. This policy on co-living housing is supported and the flexibility in the approach to the definition of this housing type is broadly welcomed. Supporting text at paragraph 6.36, which outlines the ambition to publish additional guidance to amplify Policy H6 is welcomed, subject to separate consultation. We assert that the plan should set out a timeline for when this SPD will be published in order to give developers certainty around the progression of co-living schemes ahead of this and to increase the efficacy of the plan.

The supporting text to Policy H6 states at Para 6.37 that co-living will contribute to the housing requirement at a ratio of 1.8:1 in accordance with the Government's Housing Delivery Test Rulebook. However, whilst this was the ratio outlined in the Rulebook, this was updated on the day the Local Plan was published and now stands at a ratio of 1.9:1. Given the likelihood of further updates to this

ratio during the live of the Local Plan, it is suggested that reference is made to applying the ratios outlined in the Rulebook at the time of consideration. The effect of this change is that sites delivering this form of development will now contribute less to the housing needs of Exeter meaning that equivalent densities need to be increased.

Whilst Policy H6 sets out details of the minimum communal spaces and facilities that co-living housing is required to include, it does not set out the amount of floorspace which is required, nor does it make reference to any other guidance which will be used to inform this at the decision making stage. Our experience of progressing with an application for this form of development has seen the London Plan Large-scale Purpose Built Living LPG applied by the local planning authority. Policy H6 makes no reference to space standards of any kind which is inconsistent with how the local planning authority are considering such applications. As such, we suggest that reference to the standards to be followed should be referred to in the policy or at least included in the forthcoming SPD.

Policy H10: Purpose Built Student Accommodation. We support the confirmation in the plan that PBSA makes a contribution toward housing need, as set out at Paragraph 6.63, and further support that the majority of student housing will be considered communal housing which is equivalent to 1.8:1, as set out within the Housing Delivery Test Rulebook. However, the consideration that student accommodation provided as studio flats is considered to contribute at a ratio of 1:1 in accordance with Planning Practice Guidance is unjustified and ineffective in terms of implementation of the plan.

As set out above, the use of two contradictory calculation methods in the form of PPG and the Housing Delivery Test Rulebook is questioned, and we outline that the Housing Delivery test Rulebook should be the sole calculation tool to provide clarity and certainty to decisions. Currently, it is not clear how the different types of student accommodation, including communal and studio rooms, is assessed, and it is our view that the policy should maintain a consistent approach to provide a general consideration of PBSA as a whole. As such, we contend that the policy should therefore be updated to consider all forms of PBSA rooms at the ratio of 1.8:1 as set out at Paragraph 6.63.

As set out above in respect of Policy H6, at para 6.63 the supporting text to Policy H10 refers to the contribution that PBSA can make to meeting the housing requirement. Reference is made to the Housing Delivery Test Rulebook being the basis for the ratio applied, but the text specifically references the ratio of 1.8:1, which was the correct ratio at the date of the consultation being published, but this is now 2.4:1. As such, as with Policy H6, we suggest that reference is made to application of the relevant ratio at the point of sites being considered to ensure that the contribution a site makes to housing need is reflective of national guidance. The effect of this change on the draft Local Plan is that the contribution of sites considered for PBSA is reduced meaning that the capacity of allocated sites needs to be increased to meet the identified need.

5 (c). Please set out the modification(s) you consider necessary to make this part of the Exeter Plan sound, in respect of any soundness matters you have identified at 5(b) above.

You will need to say why each modification will make this part of the Exeter Plan sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Policy H2: Housing Allocations and Windfalls (Strategic Policy). As outlined above, the flexibility with which the total number of homes can be delivered should be made more explicit within the policy, while the methodology for how the equivalencies of different housing types should also be clearly outlined. We suggest that the supporting text above Policy H2 is amended to include the following clarification:

"The units identified for each site proposed to be allocated are considered as minimum values of units and relate to the number of equivalent residential homes with accounting for the ratio for co-living and PBSA developments as detailed in the latest Housing Delivery Test Rulebook."

The addition of this text will make clear the flexibility in delivery of housing types on these allocated sites and will ensure the soundness of the plan.

Policy H6: Co-living Housing. As outlined above, we assert that the plan should be amended to include reference to the publication of the proposed Co-living SPD under Policy H6. This should be referred to by an amendment within the monitoring and implementation section of the plan under policy H1, where a reference should be added to outline that the co-living SPD will be published as one of the delivery mechanisms for Policy H1. This is necessary as this guidance is linked to the delivery of the housing target.

The table within the monitoring section under Policy H1 should be amended to show the following:

H1: Housing requirement

Indicator	Target	Delivery Mechanisms
Number of additional homes permitted	Permission for at least 642 new homes per annum	• The Exeter Plan • Planning applications • Council delivering own housing stock • Collaboration with developers • Collaboration with Homes England • Co-living SPD/Local Planning Guidance
Number of additional homes completed	Completion of at least 642 new homes per annum	

This amendment is requested to ensure that the co-living units contribute to the identified housing requirement at the appropriate level. Without sufficient certainty on how Policy H6 will be applied to this form of development, delays to consideration of such applications may occur which will delay delivery and potentially impact housing supply.

In addition, if in determining planning applications, the LPA are seeking to apply specific space standards to proposals, Policy H6 should be amended to make specific reference to the guidance that will be used.

Policy H10: Purpose Built Student Accommodation. As outlined above, Policy H10 should be amended to make clear that all types of PBSA accommodation are considered to contribute to housing delivery as a whole, and that the methodology used to calculate this contribution is based solely upon the Housing Delivery Test Rulebook. The wording of paragraph 6.63 should be amended to the following:

"All forms of student accommodation will be regarded as communal housing and will contribute towards Exeter's housing requirement at the ratio set out within the Housing Delivery Test Rulebook."

This amendment will ensure the soundness of the plan as it will provide clear justification for the methodology for how the ratios are calculated and will be underpinned by the Housing Delivery Test Rulebook. This rulebook will be amended and updated in line with national policy through the lifetime of the plan, ensuring the plan remains effective after adoption.

6. Do you consider that this part of the Exeter Plan complies with the Duty to Co-operate?

Yes ☒

No ☐

6 (a). If yes, and you wish to support this part of the Exeter Plan's compliance with the duty to co-operate, please use this box to set out your comments.
(Continue on a separate sheet if necessary)

No comments

6 (b). If no, please give details of why you consider this part of the Exeter Plan fails to comply with the duty to co-operate. Please be as precise as possible.
(Continue on a separate sheet if necessary)

N/A

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

7. If you would like to make representations on the Sustainability Appraisal (SA) please provide your comments here, stating to which part of the SA your comments relate.
(Continue on a separate sheet if necessary)

No comments

8. If you would like to make representations on the Habitats Regulation Assessment (HRA) please provide your comments here, stating to which part of the HRA your comments relate.
(Continue on a separate sheet if necessary)

No comments

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

9. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

10. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

We consider it necessary to participate at the hearing in order to put across our specific and detailed views on the additional detail required on PBSA/Co-Living which are based on experience of these forms of residential development and how they have been treated in development plans elsewhere.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

For more information on how we use your data – please read our privacy notice at the following website: <https://exeter.gov.uk/media/5750/planning-policy-privacy-notice.pdf>