

The Exeter Plan Publication Plan: Regulation 19 December 2024 (dLP) Stuart Partners Ltd

Matter 5 – Housing Land Supply

- Issue 2 – Five-year Housing Land Supply

Response to the Purpose-built Student Accommodation Note – April 2026

Introduction

This note responds to the Purpose-built Student Accommodation Note – April 2026, prepared by Exeter City Council (the PBSA Note), which was requested by the Inspectors during the Matter 5 hearing session.

At the outset, we were under the impression that a note was to be prepared on the effect of omitting development sites that were agreed by the Council not to be deliverable and should be excluded from the 5 year trajectory. The PBSA Note does not contain this information.

The PBSA Note

The purpose of the PBSA note was to provide evidence to demonstrate that the student accommodation proposed will release existing homes into the general housing market, as required by the Planning Practice Guidance. In response to this, the PBSA Note provides some partial evidence in the form of table 1, that is extracted below.

Table 1: Changes in the number of general housing market properties with a Student Council Tax Exemption and PBSA bedspaces		
Year	Properties with a Student Council Tax Exemption	PBSA bedspaces
January 2021	2,432	11,488
September 2022	2,551	12,496
October 2025	2,300	12,234 ¹

There are four key observations from the above data.

Firstly, the evidence is incomplete as data for the years 2023 and 2024 are missing. The data only therefore provides a snapshot in time and as such is unreliable. For all we know, the number of HMO's increased in the missing years. As mentioned in our Matter 5 hearing statement, in 2024 a client of ours converted 83 dwellings (C3 use) to HMO's at Rosebarn Park, Exeter. We brought this to the attention on the Council in a letter dated 20th December 2024 in order to provide evidence that the change of use occurred prior to an extension of the Article 4 area that now is in place at the site. This letter is provided at **Appendix 1**.

Secondly, the data shows a decrease in the provision of PBSA between the 2022 and 2025 period. The Council refers to the demolition of PBSA at the University of Exeter at the West Park development. CarneySweeney are the agents for this development.

Given the lack of data, and that a significant part of the partial information shows a decrease in provision, the Council has clearly failed to demonstrate that PBSA results in a measurable reduction in demand for conventional housing.

Thirdly, the Council's only source of evidence is the rate of Council tax exemptions. There is no actual tangible evidence to show that a single HMO has been returned to a family home. The Council is including some 893

PBSA bedspaces in its 5 year trajectory. If, as the Council claims, that stock is being released at such a high rate, why hasn't it produced evidence to show this is physically happening on the ground? The answer is that in reality there has been no such release due to the undersupply of student accommodation within the city. See our Matter 5 hearing statement on the latter point.

Reliance upon Council Tax exemptions is a notoriously inaccurate method of testing student populations, for the simple reason that the exemptions are not automatic and have to be applied for by the student population. It is a known fact that not all students apply for their exemptions. They ordinarily only live at an address for less than 1 year and would have left before any action could be taken against them by the Council for non-payment of Council Tax.

At the Matter 5 hearing session, we suggested that the Council provides evidence of HMO licenses granted each year. This would provide tangible evidence of the number of HMO properties in the city and an accurate assessment of any fluctuations in this form of accommodation. This information is readily available from the Council's licencing team. We suspect that the Council has not provided this information as the number of HMO's has increased year on year due to the unmet need for student accommodation.

Fourthly, while the partial data shows a reduction in Council tax exemptions, it is only a small reduction of 251 over a 3 year period. This equates to 84 per annum. Again, this can hardly be used to justify inclusion of such a significant proportion of the housing trajectory coming from PBSA.

In conclusion, the Council's data shows a decrease in delivery of PBSA. The guidance requires evidence to demonstrate that an increase in PBSA will release existing homes into the general housing market. The Council Tax exemption data provided is incomplete and does not provide tangible evidence that a single house in Exeter has been converted from an HMO to a family home. Accordingly, the inclusion of PBSA in the five-year housing land supply cannot be justified, and the housing supply figures should be considered overstated.

Omitted Sites from the Trajectory

At the beginning of the Matter 5 site by site hearing session discussion, the Inspectors confirmed that the Council agreed that a number of sites should be removed from the trajectory. We were under the impression that the Council were required to provide a schedule of these sites and the total number of dwellings to be removed from the trajectory.

From our notes, it appears that the following sites and dwelling numbers are to be removed from the trajectory.

Site	Dwellings omitted
102-104 Fore Street (11/1065/FUL)	13
102-104 Fore Street (11/1065/FUL)	3
Land for residential development at Hill Barton Farm, Hill Barton Road	274
Bricknells Bungalow, Old Rydon Lane (14/2007/OUT)	24
Hurst Almshouses, 2-24 Fairpark Road (18/0598/FUL)	19
Land at Corner of Retreat Drive, Topsham (17/1656/FUL)	10
Land at Summerland Street (23/0490/FUL)	69
TOTAL DEDUCTION	412

This agreed deduction represents two thirds of a year's supply against the annual requirement of 642 dwellings.



Table 5 of the Council's Five Year Housing Land Supply Statement September 2025, extracted below, claims a supply of five years and 4.9 months.

Table 5: Exeter's five-year housing supply position at 1 April 2027

Description	Homes
(A) Five-year housing requirement	3,531
(B) Deliverable housing supply	3,812
(C) Housing supply position	Five years and 4.9 months

The conventional method of calculating five year supply is to divide the supply figure by the annualised requirement. Using this method, as shown below, the Council is stating it has a 5.40 year supply.

A. Requirement	3531
B. Annual requirement (A/5)	706.2
C. Supply	3812
D. 5YS (C/B)	5.40

As shown below, if the agreed 412 dwellings are removed the Council's trajectory, this reduces the supply to 3,400 dwellings (3,812-412) and results in a 4.81 year supply.

A. Requirement	3531
B. Annual requirement (A/5)	706.2
C. Supply	3400
D. 5YS (C/B)	4.81

Just by removing the agreed dwellings from the trajectory, the Council is unable to demonstrate a 5 year supply of sites.

Our Matter 5 hearing statement concluded that these site and others, together with PBSA should be removed from the Council's trajectory. The total deduction amounts to 2,617 dwellings within the 5-year trajectory. As shown below, this would result is just a 1.11 year supply.

A. Requirement	3531
B. Annual requirement (A/5)	706.2
C. Supply	783
D. 5YS (C/B)	1.11



**Appendix 1 – Letter dated 20th December 2024
confirming the change of use of 83 dwellings (C3 use)
to HMO's at Rosebarn Park, Exeter.**



Broadwalk House
1 Southernhay West
Exeter
EX1 1TS

20th December 2024

Mr Roger Clotworthy
Service Lead - City Development
Exeter City Council
Civic Centre
Paris St
Exeter
EX1 1JN

Dear Mr Clotworthy,

Rosebarn Park, Rosebarn Lane, Stoke Hill, Exeter
Conversion of dwellings (C3 use) to HMO's (C4 use) Under Permitted Development Rights

I write on behalf of Sophomore Property 1 Limited please to inform you that a number of dwellings (C3 use class) have been converted to HMO's (C4 use) under permitted development rights under Class L of The Town and Country Planning (General Permitted Development) (England) Order 2015.

Enclosed is a list of properties that were purchased by Sophomore Property 1 Limited please on 30th July 2022. Following the purchase of the portfolio, a single contractor was appointed to convert the dwellings to HMO's. The conversion works were completed throughout 2024 and let to students under Assured Shorthold Tenancy (AST) agreements. All of the properties on the enclosed list are currently occupied by unrelated students.

The purpose of drawing your attention to these converted properties is so that the Council is aware that the works were carried out prior to the extended Article 4 Direction coming into force, should the occupation nature of the properties be questioned in the future.

The conversion to HMO use has therefore occurred prior to the extended Article 4 Direction coming into force on 23rd December 2024. As such, the completed works were permitted development and do not require the express grant of planning permission.



The HMO properties fall within the following two categories:

1. Occupation by 1 to 4 unrelated individuals (HMO C4 use, but unlicensed)
2. Occupation by 5 to 6 unrelated individuals (HMO C4 use, with HMO licences)

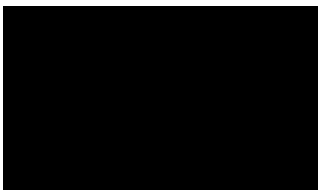
The first above category falls within C4 use class, however the Council's Private Sector Housing Team does not require an HMO licence for these levels of occupation.

The second above category falls within the C4 use class and have all been granted an HMO licence by the ECC Private Sector Housing Team.

As the portfolio of properties is sited in one location, with one owner and management body, it is our view that the group of C4 properties constitute purpose built student accommodation (PBSA).

Under Section 232 of the Housing Act 2004, a local housing authority (LHA) has a duty to establish and maintain a register of licences granted under part two and three of the act. We request that these properties are added to your HMO licence register.

Yours sincerely



Robin Upton (MRTPI)
Director – Planning
CarneySweeney

CC: Exeter City Council Private Sector Housing Team



Rosebarn Properties AS Export 20241217

Property Name	Development	Marketing Rooms	Actual Bedroom	HMO Licence
Flat 1, Lebanon Close	Rosebarn Park (Rosebarn)	2	2	No
Flat 2, Lebanon Close	Rosebarn Park (Rosebarn)	2	2	No
Flat 3, Lebanon Close	Rosebarn Park (Rosebarn)	2	2	No
Flat 4, Lebanon Close	Rosebarn Park (Rosebarn)	3	3	No
Flat 5, Lebanon Close	Rosebarn Park (Rosebarn)	3	3	No
Flat 6, Lebanon Close	Rosebarn Park (Rosebarn)	3	3	No
Flat 21, Lebanon Close	Rosebarn Park (Rosebarn)	1	1	No
Flat 22, Lebanon Close	Rosebarn Park (Rosebarn)	1	1	No
Flat 23, Lebanon Close	Rosebarn Park (Rosebarn)	1	1	No
Flat 24, Lebanon Close	Rosebarn Park (Rosebarn)	3	3	No
Flat 16, Lyncombe Close	Rosebarn Park (Rosebarn)	2	2	No
Flat 18, Lyncombe Close	Rosebarn Park (Rosebarn)	1	1	No
Flat 20, Lyncombe Close	Rosebarn Park (Rosebarn)	1	1	No
Flat 1, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Studio Flat 3, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Studio Flat 5, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Studio Flat 7, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Studio Flat 9, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Studio Flat 11, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 13, Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
Flat 14, Monterey Gardens	Rosebarn Park (Rosebarn)	2	2	No
Flat 15, Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
Flat 16, Monterey Gardens	Rosebarn Park (Rosebarn)	2	2	No
Flat 18, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 20, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 22, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 24, Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
Flat 26, Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
Flat 35, Monterey Gardens	Rosebarn Park (Rosebarn)	2	2	No
Flat 37, Monterey Gardens	Rosebarn Park (Rosebarn)	2	2	No
Flat 39, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 41, Monterey Gardens	Rosebarn Park (Rosebarn)	1	1	No
Flat 43, Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
1 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
2 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
3 Lyncombe Close	Rosebarn Park (Rosebarn)	5	5	Yes
3 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
4 Lyncombe Close	Rosebarn Park (Rosebarn)	4	4	No
4 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
4 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
5 Lyncombe Close	Rosebarn Park (Rosebarn)	5	5	Yes
5 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
6 Lyncombe Close	Rosebarn Park (Rosebarn)	4	4	No
6 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
7 Lyncombe Close	Rosebarn Park (Rosebarn)	5	5	Yes
7 Yew Tree Close	Rosebarn Park (Rosebarn)	6	6	Yes
8 Lyncombe Close	Rosebarn Park (Rosebarn)	4	4	No
8 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
9 Lyncombe Close	Rosebarn Park (Rosebarn)	5	5	Yes
10 Lebanon Close	Rosebarn Park (Rosebarn)	4	4	No
10 Lyncombe Close	Rosebarn Park (Rosebarn)	4	4	No
11 Lyncombe Close	Rosebarn Park (Rosebarn)	5	5	Yes
12 Lebanon Close	Rosebarn Park (Rosebarn)	5	5	Yes
12 Monterey Gardens	Rosebarn Park (Rosebarn)	3	3	No
13 Lebanon Close	Rosebarn Park (Rosebarn)	5	5	Yes
14 Lebanon Close	Rosebarn Park (Rosebarn)	5	5	Yes
15 Lebanon Close	Rosebarn Park (Rosebarn)	5	5	Yes
16 Lebanon Close	Rosebarn Park (Rosebarn)	5	5	Yes
17 Lebanon Close	Rosebarn Park (Rosebarn)	4	4	No
17 Monterey Gardens	Rosebarn Park (Rosebarn)	4	4	No
18 Lebanon Close	Rosebarn Park (Rosebarn)	4	4	No
19 Lebanon Close	Rosebarn Park (Rosebarn)	4	4	No
19 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
20 Lebanon Close	Rosebarn Park (Rosebarn)	4	4	No
22 Lyncombe Close	Rosebarn Park (Rosebarn)	6	6	Yes
23 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
26 Lyncombe Close	Rosebarn Park (Rosebarn)	4	4	No
27 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
31 Monterey Gardens	Rosebarn Park (Rosebarn)	6	6	Yes
32 Lyncombe Close	Rosebarn Park (Rosebarn)	6	6	Yes