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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	Councillor
First Name	Diana
Last Name	Moore
Job Title (where relevant)	Leader of Green Group. Submission on behalf of Cllrs Moore, Banyard, Read, Rees, Bennet, Wetenhall, Ketchin.
Organisation (where relevant)	Exeter City Council
Address Line 1	% Civic Centre
Line 2	Paris St
Line 3	Exeter

Line 4

Post Code

EX1 1JN

Telephone number

E-mail address

2. Agent's details if applicable

Title

First Name

Last Name

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

Line 4

Post Code

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)

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)

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)

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)

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)

Co-living housing

1. The **eligibility of Vacant Building Credit should be removed from co-living development** because
 - a. given that most co-living developments are going to be on brownfield sites, as these are considered to be the most sustainable locations for such developments, it would diminish the affordable living contributions in locations where affordable homes are needed most.
 - b. This is because Co-living is intended as temporary type tenure not long term living homes, such a subsidy is not appropriate as such accommodation is unproven and will distort the mix of accommodation in the city.
 - c. Co-living already has a subsidy in the form of no contribution to CIL and given the higher density of development could lead to a negative impact on local amenities, greenspace and heritage.
 - d. Vacant Building credit could be used to encourage mixed developments.
 - e. Vacant Building Credit has not been modelled in the Viability assessment¹ therefore its exclusion from the policy will not affect the deliverability of the plan.
2. The **policy is inadequate and lacks detail** which makes it ineffective and could lead to poor quality development and sub-standard land unaffordable living arrangements. In lieu of any supplementary planning policy, policy must be expanded in order to ensure quality and amenity and demonstrate how the amenities are 'sufficient' and must relate to a maximum resident number to ensure the building capacity is viable. It should be noted the unit and resident number may not match if some rooms are occupied by couples. This is especially important for Exeter given the market for this type of housing is emerging and policy should draw on that from LPA's where this market is more established (e.g. London²). The "minimum communal spaces" in the policy only sets out the type of facility, not any indication of the minimum expectation or ratio .e.g is one kitchen expected per 5 people or per floor? Such amenities must be free to use in perpetuity. it is noted that the Local Viability Assessment is based on a minimum of 35m², which should therefore inform the minimum room size³ which should be set out in the policy.
3. The policy **does not demonstrate how it meets the public sector equality duty to meet the needs of people with disabilities** given that policy H14b couldn't apply to co-living.
4. The **policy does not consider the impact on the development on the local neighbourhood and local services** in terms of the creation of clusters of co-living or co-living and PBSA, especially as such developments will depend on the use of local amenities and services and impact on the mix of the neighbourhood or may in some cases undermine local public amenities through the provision of onsite amenities such as cinema, or swimming pool. development should be encouraged to include public amenities and employment opportunities such as restaurants, bars and communal workspace which should be promoted for use by the surrounding local community; and be made available co-living residents at no extra cost. Any employment-space uses complement and strengthen the local economy.
5. **Monitoring** of Co-living should include information about the cumulative impact on services and infrastructure of existing co-living and similar development types such as purpose built student accommodation (PBSA). Management companies should provide an annual report on the occupancy levels in order to enable the council to assess the extent to which this housing typology meets local housing needs.
6. Co-living should **only be considered where the housing mix is lacking to meet local needs** i.e. for a lack of accommodation for single-person households who cannot, or choose not to, live in self-contained homes or HMOs. Clusters of such development should be prevented in order to not 'crowd out' conventional housing schemes, affecting the ability to meet a range of needs. To protect neighbourhood amenity new developments of this type

should be sited away from any emerging clusters of co-living, especially where there is also a cluster of PBSA; or add to housing mix where it is lacking so the pipeline of the housing mix in the neighbourhood should be considered in decision decision-making.

7. **Affordable housing -**

Given the nature of the housing type it is clear that co-living cannot be considered an affordable housing offer. It does not provide accommodation suitable for households in need of genuinely affordable housing.

H6 sets out a **financial contribution towards the off-site provision** of affordable housing in accordance with Policy H5. However, H5 sets out a presumption of an onsite contribution. **H6 should set out an expectation that affordable units are required onsite or provide tailored provisions for offsite affordable housing provision that are relevant to co-living developments.**

This should include **affordable housing at a higher proportion**. Given that accommodation units are calculated in the housing supply figures on a pro rata basis (80%) which results in a significant reduction in the affordable housing numbers or financial contribution, for instance:

500 build to rent units @ 20% affordable housing = 100 units;
compared to 500 co-living units @ 20% affordable offsite housing = 80 units.

Where **land is provided by the Local Authority (as is has been) for Coliving development - the proportion of affordable housing contribution should be higher** as this is a short term commercial housing product and the LA is foregoing the use of the land and affordable housing contributions necessary for long term social rent opportunities.

8. **Housing mix:** Whilst co-living is considered to provide an additional housing option for some people, this type of accommodation does not meet minimum housing standards and cannot therefore be considered to meet the ongoing needs of households in Exeter. In light of above, the small nature of Exeter as a city and to encourage mixed neighbourhoods, developments consisting only Co-living should be discouraged. As discussed, affordable housing should be encouraged on site and to achieve this on larger sites, particularly where opportunities to provide a mix of sizes and tenures within the area are constrained, blocks of conventional C3 housing in addition to co-living units should be encouraged.

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)

Drawing on the London Local Plan policy where co-living is a more established market the following additions and amendments are requested in order to improve effectiveness of the policy and deliverability of good quality development. It is noted that a co-living supplementary planning document is proposed in the local development scheme, so a policy should be set out in full in the Local Plan.

To ADD to improve soundness:

1. Vacant Building Credit does not apply to developments consisting of 100% co-living units. Vacant Building Credit will apply where co-living makes up no more than 25% of a development
2. 'Developments should be located and designed to contribute positively to the character of the area, and the creation of mixed and inclusive neighbourhoods. At the neighbourhood level, development should be located away from any emerging clusters or concentrations of Co-living and PBSA; or add to housing mix where it is lacking.'

[continues... as policy in preamble:]

Such concentrations may be spatial (particularly at neighbourhood scale) or as a proportion of housing delivery overall. In these cases co-living may be considered to 'crowd out' conventional housing schemes, affecting the ability to meet a range of needs.

3. On larger sites of 50 potential units or more, 'particularly where opportunities to provide a mix of sizes and tenures within an area are constrained, a proportion of conventional C3 housing in addition to co-living will be sought.
4. The development should ensure the associated public realm is designed with different users in mind, including both residents and people in the surrounding communities who use wheelchairs or who have other mobility impairments.
5. 'Where necessary, improvements to the surrounding public realm should be achieved through planning obligations to ensure good connectivity through walking, cycling, green infrastructure and other streetscape elements. These should mitigate any crowding impacts that may arise at particular times from building access or egress.
6. Building design should have regard to the needs of people with a range of disabilities and impairments. Beyond wheelchair access, this could include the impacts of other mobility, sensory, dexterity and learning difficulties; and needs arising from particular mental health conditions. Design responses should consider the use of colour, light, soundproofing and way-finding; the ease of opening doors and windows; equipment/facility height; and space for wheelchair access and manoeuvres.' A minimum of 10% of units should be fully wheelchair accessible.
7. A maximum resident number must be set out. The approach to internal and external communal areas should be design led, taking into consideration the composition of the different spaces, their interrelationships across the building and their use(s). Where bedroom

sizes are smaller, it should be expected that a higher quantum of communal space is achieved to help offset this, though a balanced approach is preferred.

8. Communal areas should be inclusive, well designed, adequately sized, well ventilated, conveniently accessed, and sufficient to meet the requirements of the anticipated number of residents. They should be designed for flexible use, so residents can feel a reasonable degree of autonomy and are enabled to develop a sense of community. There should be the potential for different ways of using the space over the course of a day or a week, and over time. Where appropriate, communal facilities should integrate with the public realm and external spaces.'
9. Provision of some public (non-resident) access to elements of the communal facilities is encouraged, to promote integration of the Co-living with the local area. This may be particularly appropriate for workspaces and facilities such as cafes. Facilities open to the public may count towards resident communal space requirements where they are integrated within the Co-living accommodation, managed integrally by the building's manager; and accessible to residents at least 12 hours a day, and at least six days a week.
10. Units should be accessed through a shared internal area and not have a separate external access.
11. Units should be suitably sized to accommodate amenities for sleeping, eating, working, relaxing and storage. They should be no less than [35] sqm, and no more than [x] sqm, to avoid them being used as substandard self-contained units. Larger units may be suitable for occupation by couples. Accessible units are generally expected to be between [x] and [x] sqm to accommodate ease of access to the amenities
12. Units should be designed to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions.
13. Recommended benchmarks of total internal communal amenity space provision:

Up to 100 internal amenity space 10 sqm per resident
Every additional resident from 101 to 400 8 sqm per additional resident
Every additional resident from 401 6 sqm per additional resident

Add additional clauses in relation to amenity and improve soundness:

- Adequate laundry and drying facilities should be provided for residents at no additional charge; and should not be used by the management company for washing bedding and linen. The management plan should include information that demonstrates how the proposed provision will satisfy the needs of future residents; and how the machines will be managed and maintained.
- Lounge and living spaces should be of high-quality design to encourage incidental meetings, socialising, lounging, engagement and recreation. A variety of spaces should be provided to allow for smaller group interactions; engagement for larger groups; and quieter spaces, such as prayer rooms.
- Internal communal (social/living) spaces should be distributed across the development to promote use and be easily accessible to all, including disabled people. They should be adequately sized; integrated within the building design; and not provided in leftover spaces.

- Sufficient and comfortable seating, in the form of sofas and lounge chairs, should be provided throughout the space to allow for lingering and comfortable interactions for the intended number of users. Quantity of seating provided should allow for residents' visitors.
- Common work areas should be provided, where possible, to enable hybrid working environments, and avoid the use of kitchen/dining spaces for these purposes. Use of these areas should be at no extra cost to residents. Such workspaces should have high-speed broadband connections. Desk spaces should be equipped with charging points; and should be fully adjustable for comfortable use over longer periods by residents of various heights and disabilities.
- Toilet facilities should be provided in proximity to communal spaces, such that they are accessible to residents when away from their own rooms, and to their guests.
- Some additional storage areas, in the form of lockers or cupboards, should be provided for each resident to store personal belongings, including larger items.
- Opportunities for the provision of external communal space should be maximised, recognising its role in providing for both wellbeing and urban greening and biodiversity. Such space should be accessed directly from usable (and preferably communal) internal spaces. External communal space should be overlooked by usable internal spaces and, where possible, private units to avoid creating isolated areas that cannot be used safely.
- Any private balconies or terraces (for individual units) should not count towards the communal space requirement.

To AMEND to improve soundness:

Amend current clause c [additions in bold]

Include the following minimum communal spaces and facilities at a sufficient quantity to meet the needs of the total number of intended residents and located to provide each resident with convenient access:

- A kitchen **[to be set at a ratio e.g. 0.5 sqm per resident, to include one cooking station per 5 residents, minimum equipment to include: Hob & oven, sink and draining board, Fridge with freezer, Dishwasher, Microwave, Base or wall units for food and utensil storage]**
- Other internal space for dining and socialising; **[Two dining spaces per cooking station; or number of dining spaces = 25% of total residents]**
- Collaborative workspace;
- Outdoor amenity space (**communal** roof terrace and/or garden); **[Up to 400 residents 5 sqm per resident Every additional resident from 401 3 sqm per additional resident]** Laundry and drying facilities; **[One washer and one dryer per 30 residents)** and
- Storage and refuse facilities. **[storage xm2/per person, refuse/recycling facilities in units and communal area, including recycling]**
- **Toilet facilities in communal areas.**
- **Circulation space (corridors, stairs, lifts, lift lobbies)**
- **Cycle storage 0.75m2 per person**

- **Car parking - none, only [x] number per 100 for blue badge holders.**

Amend Affordable housing contribution clause d to meet the objectively assess housing need set out in the LHNA:

Deliver a financial contribution towards the off-site provision of affordable or social housing. The expected contribution will be assessed in relation to either 35 per cent of the units, or 50 per cent where the development is on public-sector land or industrial land appropriate for residential uses. The contribution is to be based on 50 per cent of the market value.

If the site is suitable for incorporating other types of development in addition to the co-living, on-site provision of C3 affordable housing should be encouraged.

Amend clause i

Are professionally managed in accordance with a **detailed and resourced** Management Plan that includes

- a. a regime for cleaning, waste management and collection, maintenance, security and the provision of social activities;
- b. the maximum number of residents that can occupy the Co-living development**
- c. how the proposed communal equipment, facilities and spaces, and their operation and maintenance, will satisfy the varying needs of this number of residents and their guests, on an ongoing basis;**
- d. how management practices will meet policy requirements, including to ensure that the development continues to function as a high-quality Co-living scheme.**
- e. The management plan should be appropriately secured through a section 106 agreement. It should detail how the Co-living development will be managed by a single management company, whilst allowing for appropriate transfers, in perpetuity. And it should provide for continuity of communal space, facility and service provision, including relevant aspects of the inclusive design statement, in perpetuity, regardless of changes in ownership or management.**
- f. Security and fire safety procedures – this should include detail regarding:**
 - i. relevant procedures for emergency and fire access and exit (as separate information, but aligned with, the fire safety statement)
 - ii. safeguarding of external and internal communal spaces, and safety measures for private units and communal spaces registration of any electrical products, such as white goods, that are built into the property, and encouraging residents to do the same; this will help to pick up any recalls, and ensure safety of the residents and the building preparation of Personal Emergency Evacuation Plans (PEEPS) for all residents whose ability to self-evacuate may be compromised, taking into account the General Data Protection Regulations (GDPR) and the Data Protection Act (2018).
- g. Move-in and move-out arrangements, deliveries and servicing – this should include detail regarding:**
 - i. the location of loading and unloading areas to ensure the public realm is not obstructed by parked vehicles, and there is no negative impact on highway or road traffic, nor on surrounding communities
 - ii. timings of move-in and move-out to avoid congestion impacts, and impacts on any other important events (e.g. cultural celebrations) in the surrounding communities routes and lifts to be used during move-in and move-out, to ensure the smooth operation of communal spaces and other services of the development security and concierge provision storage facilities for deliveries when a resident is not immediately available.

- h. Management and maintenance of all internal and external areas of the development – this should include detail regarding:**
- i. hours of operation for various functions,**
 - ii. allowing for appropriate cleaning and maintenance access resourcing of communal areas including communal cooking and dining equipment, cleaning materials and waste management receptacles**
 - iii. procedures for how cooking and dining facilities will be managed and maintained to ensure all residents can comfortably cook and eat when they desire, avoiding wait times and conflict with people using the space for other purposes systems and procedures to ensure appropriate cooking facilities for faith-based groups, and those with particular allergies and dietary preferences – for example, by designating separate cooking stations,**
 - iv. storage and fridge/freezers within the kitchen areas,**
 - v. provision of quiet spaces, with the flexibility to be used as prayer rooms if required by residents**
 - vi. where a facility has an element of public use, the ways in which there will always be sufficient availability/capacity for residents first and foremost, as opposed to external users,**
 - vii. cycle storage provision, servicing, maintenance and upkeep**
 - viii. personal storage management out-of-hours management landscaping upkeep.**
- i. Cleaning and linen-changing – this should include detail regarding:**
- i. location of facilities for linen laundry, storage and related services location of facilities for waste management, refuse and recycling linen changing and/or room-cleaning services (e.g. a schedule)**
 - ii. the cleaning of internal and external communal facilities and spaces including associated waste management provision**
- j. Tenancy arrangements:**
- i. ensure 3 month plus tenancy agreements for all units**
 - ii. ensure that no part of the coliving accommodation is run as a hotel or hostel**
 - iii. prevent cohabiting in smaller private units, and**
 - iv. exceedance of the maximum resident number**
 - v. prevent units being turned into self-contained units (e.g. through additional equipment being installed within them)**
 - vi. detail how marketing will promote the inclusiveness of the development, with appropriate awareness of the accessible room provision and other features that cater to diversity of need rather than a particular demographic**
 - vii. provide for all services and facilities that are included in the assessment of sufficiency to be covered the rent, except utility bills for individual units (although rents may be inclusive of bills).**

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)

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)

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)

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)

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

Yes, I wish to participate in

x

hearing
session(s)

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)

As councillors (some of whom have sat on the planning committee) we have experience of trying to work with planning policy in practice and how planning decisions are taken within the Council.

As ward Councillors we have experience of how planning policy affects the community and local environment and the extent to which it may or may not be effective in achieving the stated policy outcomes. We are also advocates for our communities and have identified where planning policies are not effective in terms of meeting positive planning outcomes for our communities and local environment.

The issues we have commented on in these representations are ones which concern us most (having made previous representations). However, it should be noted that, there has been no opportunity for formal joint working arrangements or Scrutiny (as set out in the Local Government Act) of the local plan policies, despite our numerous formal requests. While the strategic direction was set by the administration and approved by Council it should be noted that the emerging plan policies have not been subject to any formal political oversight, for example in a council strategic planning committee. Our group has objected to the process on numerous occasions. We are therefore having to make a number of representations to the Inspector on the matters that will have the most impact on our communities and environment.

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.

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