

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

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

2. Agent's details if applicable

Title

Mr

First Name

Stuart

Last Name

Houlet

Job Title (where relevant)

Planning Director

Organisation (where relevant)

PCL Planning Ltd

Address Line 1

13a-15a Old Park Avenue

Line 2

Exeter

Line 3

Line 4

Post Code

EX1 3WD

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	6.54 to 6.64	Policy	Policy H10 Purpose Built Student Accommodation	Policies Map	
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4. Do you consider that this part of the Exeter Plan is legally compliant?

Yes		No	
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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	x
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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)

The Plan is not sound because it has not been positively prepared, is not justified by its evidence base, will not be effective and is inconsistent with national policy. The reasons for this are set out below.

We note with some concern that the Plan appears to be heavily focussed on PBSA and its perceived role in supporting housing delivery in the City. In doing so it appears to demonstrate the Council's lack of understanding of the interrelationship between such accommodation and Exeter's existing housing market stock and local housing needs. As a result the Council appear to be over-exaggerating the role PBSA should play in its contribution to housing supply.

The Council are incorrect to suggest that PBSA can directly contribute to housing supply as it requires assessment of the extent that such accommodation results in release in the wider housing market by allowing properties to return to general residential use. Having reviewed the Council's evidence base (Greater Exeter: Student Housing Needs Assessment, November 2024) there appears to be an assumption that the net migration of students is included within the Standard method and therefore accounted for in the LHN of 642 dpa.

However, we dispute this on the basis that the Households projection element of the Standard Method is based on data trends between the years 2009 to 2014 (see 'Household Projections 2014-based: Methodological Report' p.8). Therefore, student occupation of market housing has only been factored in for this period. Any increase in student occupation of market housing at a rate greater than that in 2009 to 2014 would not be accounted for.

The impact of student occupation on Exeter's market housing stock could be understood by reviewing Student Council Tax exemption data. However, this data has not been provided.

Beyond that there is no evidence that the growth in demand for student accommodation since then has been factored into the Standard Method and as a consequence for PBSA to count towards meeting the LHN the Council will still need to demonstrate (in accordance with the Practice Guidance) the actual release of market housing that is attributable to PBSA. It is important that this issue is scrutinised in order to not miss opportunity to provide sufficient housing to meet identified local needs.

With the current data available, it appears unlikely that market release has occurred. Annual student numbers growth is indicative of growth in student's occupying market dwellings. This data is provided in Figure 1 of the Greater Exeter: Student Housing Needs Assessment Report of Findings, November 2024'. In the period of 2009 to 2014 (which correlates with the data that feeds into the standard method) there was a cumulative increase of 2,583 students (431pa) who were not part time and did not live at home. In the period 2015 to 2022 there was a cumulative increase of 7,749 students (1,107pa) who were not part time and did not live at home.

This represents approximately a 257% increase in the number of students per annum since the baseline included in the standard method. Whilst this does not represent the number of students that have gone into market housing, it is such a significant increase in student presence in Exeter compared to the 2009 to 2014 period (where the data trends contributed to the standard method projections) that further investigation is required (for example, through a review of Student Council Tax exemptions, as indicated above).

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)

The role of PBSA within the housing market requires further clarification and research to justify the assumptions in respect of housing land supply.

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 hearing session(s)

☐

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

Yes

☐

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:

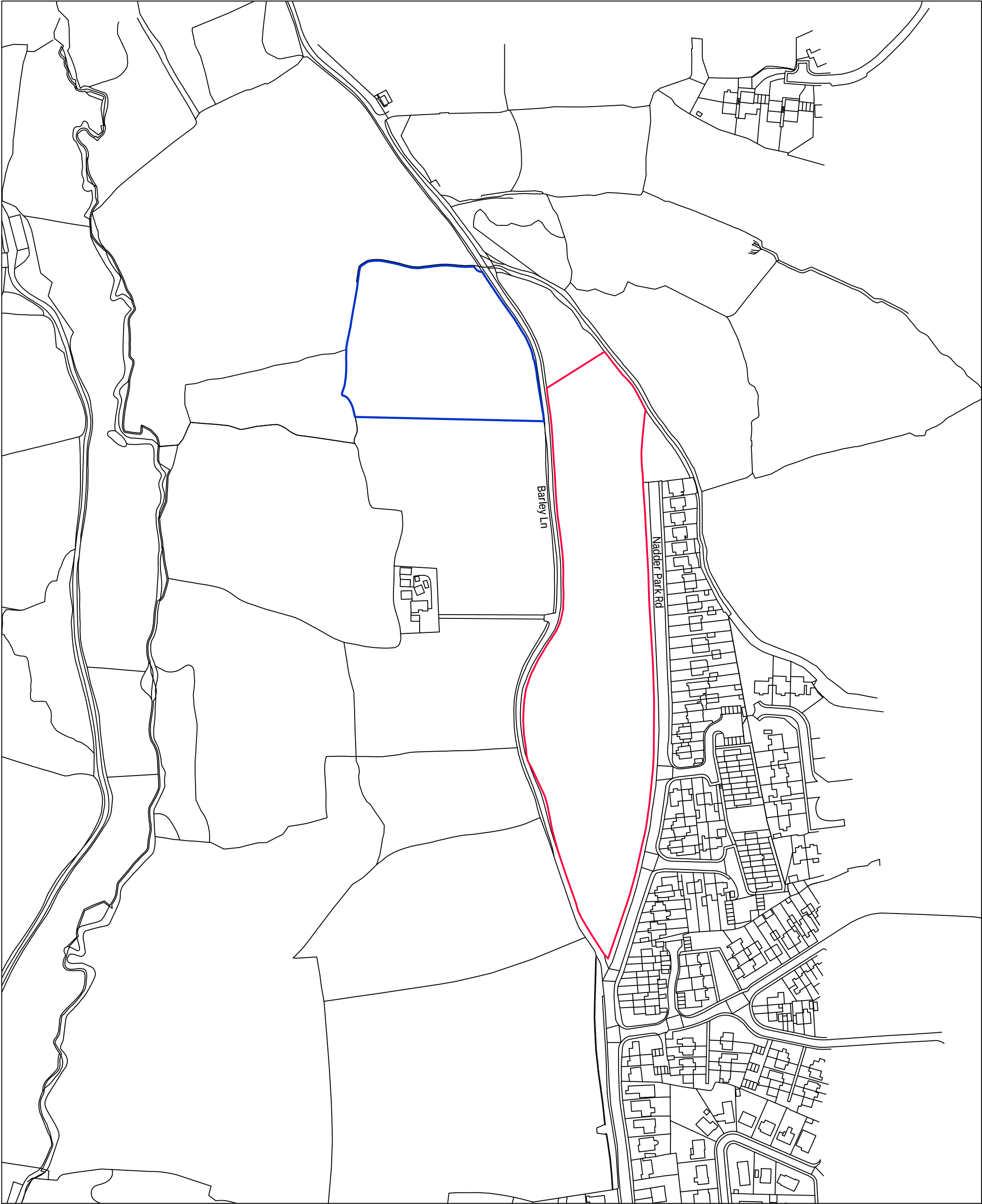
(Continue on a separate sheet if necessary)

In order to make our representations in respect of our clients significant concerns regarding the soundness of the Plan and the missed strategy and site opportunities.

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>

Appendix A
Location Plan – Barley Lane, Exeter



- Application boundary
- Offsite area for Biodiversity New Gain requirements

BARLEY LANE, EXETER		-
LOCATION PLAN		SKH/DH
220720 L 01 01	1:2500/A3	FEB 2025

CliftonEmerydesign



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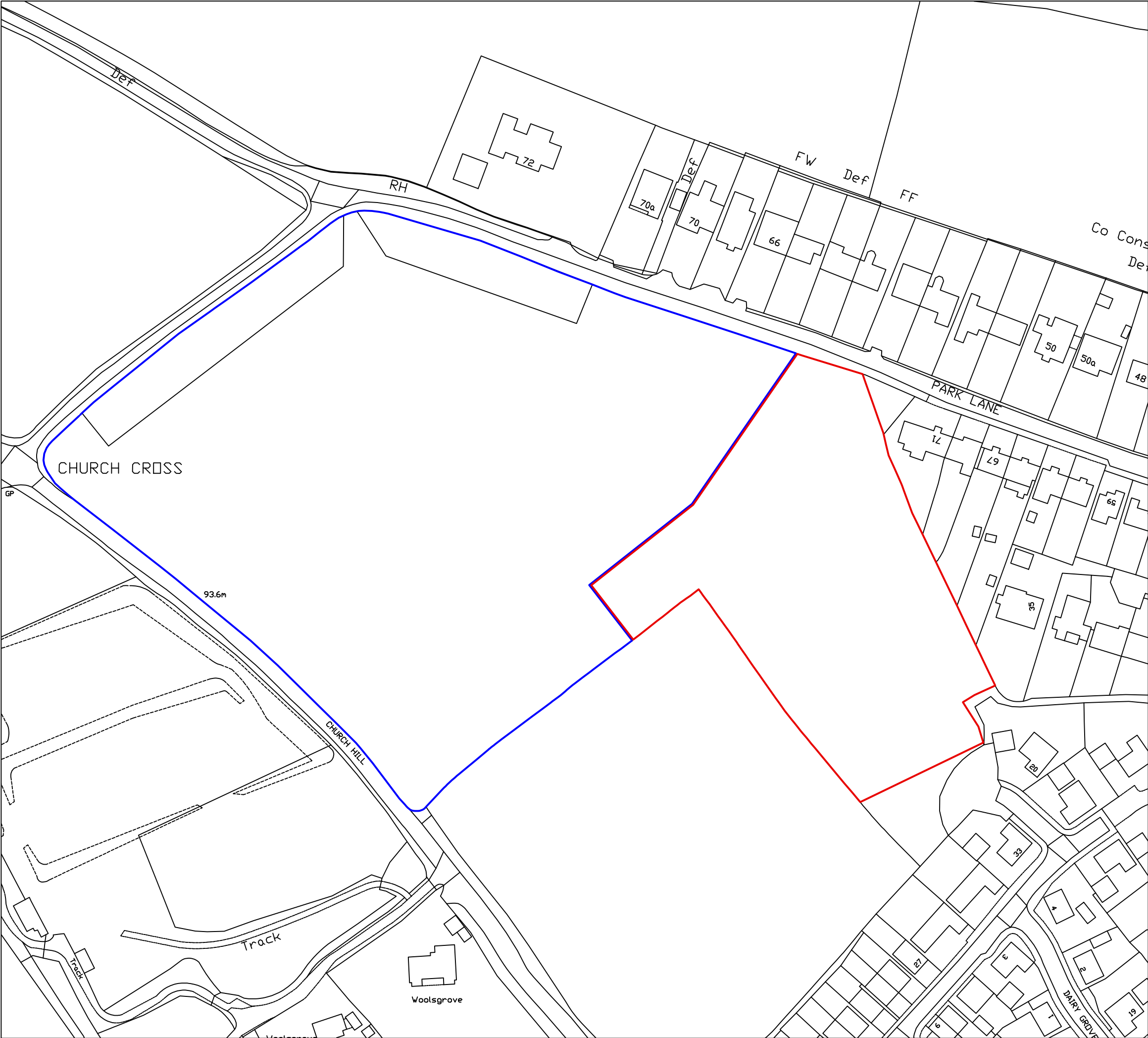
DRAWING STATUS PLANNING

10 120 140 160 180 100 m

1200 m

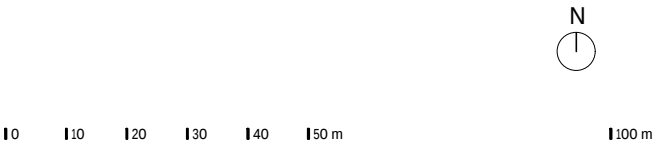
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Appendix B
Location Plan – Home Farm, Pinhoe



NOTES

- Site boundary
- Land under client control



REV	NOTES	DATE
231018 L 01 01	Home Farm, Pinhoe Location plan	- SKH / DH
1:1250/A3		Feb 2025

CliftonEmerydesign

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DRAWING—STATUS Planning

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