

Exeter Plan

Purpose-Built Student Accommodation Note

Relating to Matter 5: Housing Land Supply

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1. Introduction

1.1 During the Hearing sessions for Matters 5 and 7, the Inspectors asked the Council to provide a note to clarify the following points relating to purpose-built student accommodation (PBSA):

- How PBSA contributes to the housing supply, including the conversion ratio used.
- The amount of PBSA included in the housing trajectory.
- The University of Exeter's current growth projections.

1.2 This note responds to the Inspectors' request.

2. How PBSA contributes to Exeter's housing supply, including the conversion ratio to be used

How PBSA contributes to Exeter's housing supply

- 2.1 Paragraph 034 of the Housing Supply and Delivery Planning Practice Guidance (PPG) states that:

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published [census data](#), and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.” (Underlining added by the Council, except for the census data hyperlink).

- 2.2 Through the use of “and/or” at the end of the first bullet point, there are two exclusive ways that PBSA can be counted towards the housing supply. Of these two ways, the Council proposes to count PBSA in the housing supply based on *“the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation”*.
- 2.3 Evidence to justify this approach is provided by the 2024 Greater Exeter Student Housing Needs Assessment, which clearly shows that the Plan's housing requirement includes housing for at least 15,000 additional students (EVB-H-01d: paragraphs 25 and 26). This means that every PBSA bedspace provided over the plan period will allow general market housing to remain in such use (up to a threshold of (at least) 15,000 PBSA bedspaces). These PBSA bedspaces can be counted directly towards the housing supply based on application of the appropriate conversion ratio. It will only be necessary for the Council to demonstrate that PBSA

has “released” accommodation into the wider housing market (as per the first bullet point in the PPG) if the threshold of (at least) 15,000 PBSA bedspaces is met during the plan period.

- 2.4 During the Hearings, attendees argued that the Council could only count PBSA in the housing supply if there was evidence to demonstrate consistency with both PPG bullet points. As set out above, the Council disagrees with this assertion. Nonetheless, table 1 shows that the number of general housing market properties that benefit from a Student Council Tax exemption (on grounds that they are fully occupied by students) has fallen by 132 over the past 4 years (or 251 over the past 3 years), whilst the number of PBSA bedspaces has increased. In other words, table 1 shows that the provision of new PBSA bedspaces has coincided with a release of properties from student occupation to the general housing market.

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

- 2.5 To ensure consistency with the PPG, the Council does not propose to include 132 (or 251) additional homes in the housing supply, This is in order to avoid double counting with the provision of PBSA.

The conversion ratio

- 2.6 The PPG extract is clear that PBSA studio flats can be counted in the housing supply on a one for one basis. Therefore, in the Exeter Plan Housing Trajectory (EVB-H-03) and September 2025 Five Year Housing Land Supply Statement (EVB-H-04a), the Council has counted PBSA studio flats as individual dwellings.
- 2.7 The PPG is also clear that all other student accommodation should be counted in the housing supply using a conversion ratio based on the average number of students living in student only accommodation, using published census data. The PPG’s “census data” hyperlink is to an Office for National Statistics spreadsheet of data from the 2011 census, showing the number of students living in student-only households (in the general housing stock and PBSA). The data is provided at national (England and Wales) and local authority levels. In 2011, the number of students living in student-only households at a national level was 2.5, and at an Exeter level was 3.4. It should be noted that the PPG does not stipulate that a local conversion ratio must be used when counting student accommodation in the housing supply.

¹ The small decline in PBSA bedspaces recorded in October 2025 is due to the demolition of some existing PBSA on the University’s Streatham Campus, as part of the West Park scheme of redevelopment which will ultimately provide a net gain of PBSA.

- 2.8 It is also important to note that, when the latest edition of the PPG was published, the hyperlink was not updated to provide equivalent 2021 census data. This means that the hyperlink refers to data that is now 15 years old. The Council is particularly concerned that the 2011 Exeter-specific conversion ratio of 3.4 is out of date: Council monitoring shows that PBSA studio flats now comprise a far greater proportion of student housing than was the case in 2011, which suggests that the Exeter-specific ratio will have (potentially significantly) reduced from 3.4 since 2011.
- 2.9 The latest edition of the Housing Delivery Test Measurement Rulebook (EVB-H-18: published December 2024) provides a more recent and, in the Council's opinion, more reliable conversion ratio, because it is based on 2021 census data. The Rulebook advises that, at a national level (England and Wales) the number of students living in student-only households has changed from 2.5 to 2.4 (EVB-H-18: paragraph 10). The Rulebook does not provide ratios at local authority-level and the ONS has not formally released these on its website, so the Council has not been able to use the 2021 Exeter-specific ratio (and, again, the PPG does not require the use of a local ratio).
- 2.10 For these reasons, the Council has counted PBSA completions (that are not studio flats – see paragraph 2.6 above) in the housing trajectory as follows:
- Up to publication of the latest Rulebook in December 2024 (i.e. from 2022/23 to 2024/25), every 2.5 bedspaces have been counted as one home.
 - From publication of the latest Rulebook (i.e. from 2025/26 onwards), every 2.4 bedspaces have been counted as one home.
- 2.11 The Council's approach to counting studio flats on a 1:1 basis and applying the national conversion ratio when counting all other PBSA is the same as that of several other local planning authorities with large student populations, including Leeds City Council, Manchester City Council and Nottingham City Council.

Suggested main modification

- 2.12 Paragraph 6.63 of the supporting text to Policy H10 of the Publication Exeter Plan (CSD-02: page 49) currently erroneously states that:

In accordance with Planning Practice Guidance, purpose built student accommodation provided as studio flats will count towards Exeter's housing requirement on a 1:1 basis. All other forms of student accommodation will be regarded as communal housing and will therefore count towards Exeter's housing requirement on a ratio of 1.8:1, as the per the Housing Delivery Test Rulebook.

- 2.13 To correct this error and accurately reflect the appropriate conversion ratio that the Council proposes to apply going forwards, the Council would like to suggest the following main modification to paragraph 6.63. This would replace existing suggested additional modification SAMM39: see CSD-03, page 64: Revisions shown in red.

'In accordance with Planning Practice Guidance, purpose built student accommodation provided as studio flats will count towards Exeter's housing requirement on a 1:1 basis. All other forms of student accommodation will be regarded as communal housing and will therefore count towards Exeter's housing requirement ~~on~~ at a ratio of ~~1.8:~~ 2.4 bedspaces to 1 home, as ~~the~~ per the Housing delivery Test Rulebook.'

3. Amount of PBSA in the trajectory and the University of Exeter's current growth projections

- 3.1 Table 2 shows the amount of student accommodation the Council anticipates will be delivered over the plan period as PBSA, as reflected in the Exeter Plan Housing Trajectory (EXM-H-03). The dwellings-equivalent figures in column 3 reflect the Council's approach to counting studio flats on a 1:1 basis and applying conversion ratios of 1:2.4 or 1:2.5 to all other PBSA, as set out in paragraphs 2.6 and 2.10 of this Note.

Table 2: PBSA supply 2022-2042		
Source	PBSA bedspaces	Dwellings-equivalent
Completions • 2022/23 • 2023/24 • 2024/25	383 207 75 101	214 115 55 44
Planning permissions at 1 April 2025 ² • Water Lane (South) • The King Billy & 26-28 Longbrook St • West Park, Stocker Road • 36, 37 & 38 High Street • Apparelmaster, Cowley Bridge Road	2,092 320 108 1,290 (net) 24 350	1,026 133 108 538 (net) 11 236
Housing allocations • East Gate: Clarendon House • Heavitree Road Police Station • Red Cow • Rougemont Switching Centre • Land at Exeter Squash Club • Land & buildings at Victoria St • Fever and Boutique	1,101 202 399 334 74 41 41 10	897 202 399 197 43 24 24 8
Windfalls	1,421	998
Total	4,997	3,135

- 3.2 The Inspectors asked the Council to identify the amount of PBSA included in policy H1's completion figure. As shown in table 2, PBSA contributed the equivalent of 214 homes to completions in 2022/23 to 2024/25. This equates to only 11% of the 1,939 homes (see EVB-H-03: page 5, row 2) completed in those years.

² EXM-H-03: page 37, site ref. MSO06(S); page 38, site ref. MSD44(S); page 39, site ref. MSD45; page 40, site ref. MSD46; and page 41, site ref. MSD47.

- 3.3 The Inspectors also asked the Council to update the amount of PBSA included in policy H1's figure for planning permissions at 1 April 2025. This was because the Council had mistakenly counted the PBSA included in the outline application at Water Lane (South) as co-living housing. Table 2 shows the updated position: in terms of sites with planning permission at 1 April 2025, PBSA is expected to contribute the equivalent of 1,206 homes to the housing supply.
- 3.4 The derivation of table 2's figures for housing allocations and windfalls is based on robust evidence, as explained in paragraphs 2.12 to 2.13 of the Council's Matter 5 Hearing Statement (CS5: pages 7 and 8).
- 3.5 Table 2 shows that, in total, the Council anticipates PBSA will provide the equivalent of 3,135 homes over the plan period. This amounts to:
- 24% of the housing requirement (12,840 homes).
 - 22% of total identified housing supply (which, during the Hearing Sessions for Matters 2 and 5, the Council suggested should be modified to 13,969 homes).
- 3.6 Based on these percentages, the Council does not consider that the Plan is overly reliant on the provision of PBSA to meet the housing requirement, or that the anticipated provision of PBSA will result in a failure to meet other housing needs. This position has a strong relationship with the future growth of the University of Exeter which is explained below.
- 3.7 During the Matter 5 Hearing Session, the Council referred to a statement provided by the University of Exeter that sets out its future growth projections³. In the statement, the University advises that it expects the number of students needing accommodation in Exeter to increase by c.2,160 between 2024/25 and 2030/31. In parallel with the Council's aim to avoid the loss of the regular housing to the student market, this provides clear evidence that there is a continuing, growing need for PBSA in the city. The anticipated increase of students in need for accommodation is slightly less than the number of PBSA bedspaces included in the Exeter Plan Housing Trajectory for 2024/25 to 2030/31 (2,474 PBSA bedspaces⁴): this will provide a small surplus in PBSA provision to enable the continued release of general housing stock from student occupation.

³ For reasons of commercial sensitivity, the University of Exeter has asked that its detailed projections are not released to the public, although it is content for the headline growth projection to be released.

⁴ In 2024/25, 101 PBSA bedspaces were completed: see table 2 of this note. From 2025/26 to 2030/31, 2,373 PBSA bedspaces are expected to be completed: see EVB-H-03 - site refs. MSD44(S), MSD45, MSD46 and MSD47 on pages 38 to 41, site ref. 145/103 on page 62; and site ref. 104 on page 63). A windfall allowance for major sites is not made for 2024/25 to 2030/31, so the Council does not anticipate that PSBA will contribute to windfall development in those years.

4. Conclusion

4.1 This note sets out the Council's position on key matters relating to PBSA. In summary:

- The Council considers that its method of counting PBSA in the housing supply is consistent with PPG.
- The amount of PBSA included in the housing trajectory is appropriate given the assessed need for additional PBSA, the University of Exeter's growth projections and the Council's aim to avoid the loss of the regular housing to the student market.