

Further Representations on The Exeter Plan
On Behalf of Stuart Partners Ltd and Broom
Matter 5 Housing Land Supply Paper EXM-07h on PBSA

5th of June 2026

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1. Introduction

1.1. McMurdo LPD Ltd (“McMurdo”) acts for:

1. Stuart Partners Ltd, which controls strategic land:

- making up a significant part of the proposed New Town, Marcombe, in East Devon which will deliver housing only in the second part of East Devon District Council (EDDC)’s plan period;
- making up a small part of the second phase of Cranbrook New Town, in East Devon, benefitting from a resolution to grant planning permission for up to 180 houses which cannot be drawn down because a lack of education infrastructure is holding up the delivery of all housing in the second phase of Cranbrook;
- making up a significant part of an advancing proposed extension of Circa 1,750 houses adjacent to Exeter, in the western part of East Devon, between Clyst St George and Clyst St Mary;
- comprising a 3rd phase of the Pinhoe Urban Extension to Exeter (in East Devon) for up to 165 houses for which an appeal against the refusal notice issued by EDDC will shortly be submitted;
- making up Hill Barton Industrial Estate in the western part of East Devon (part of which is in the Waste Plan) and its expansion areas (which are of sub regional importance).

2. Broom which:

- retains an interest in the advancing proposed extension of Circa 1,750 houses adjacent to Exeter, in the western part of East Devon, between Clyst St George and Clyst St Mary;
- owns and controls other land adjacent to Exeter in the western part of East Devon suitable for housing and employment uses.

2. Further Response to Matter 5 –Housing Land Supply Paper EXM-07h on PBSA

2.1. From our response to Inspectors' Matters, Issues and Questions For Examination of the Exeter (Exeter City Council (ECC)) Local Plan (with Appendices) https://exeter.gov.uk/media/qjuh0sgp/psvar-c34-c06-stuart-partners-broom-matters-1-2-3-4-5-7-8-9-statement_redacted.pdf, the background to housing delivery and supply in Exeter is, concisely:

1. Exeter is more than 2,000 houses short in the current Plan period and cannot demonstrate a 5 year housing land supply.
2. Its neighbour, East Devon is more than 2,500 houses short in the current Plan period and cannot demonstrate a 5 year housing land supply.
3. Exeter's and East Devon's affordable housing needs are chronic.

	Total number of households in housing need (and registered with Devon Home Choice
East Devon	2,985
Exeter	1,936

Reference: Devon Home Choice Quarterly Monitoring Report (January 2026)

4. In their respective emerging Plans, both Exeter and East Devon are pushing strategic scale housing delivery to the back end of their housing trajectories.

2.2. Set against these dire housing delivery and supply circumstances, the Council is attempting to rely on Purpose Built Student Accommodation (PBSA) to try to demonstrate an acceptable housing land supply despite the fact that PBSA cannot

“release” housing into the Exeter market given the significant increase in students at Exeter University (acknowledge by the Council).

- 2.3. The Council is relying on Paragraph 34 of the Housing Land Supply and Delivery Planning Practice Guidance (PPG) to justify the inclusion of PBSA in its housing supply figures.
- 2.4. This paragraph states that “[PBSA]...can in principle [my emphasis] count towards contributing to an authority’s housing land supply”. It does not say that it “must” or that it “should” or that it “shall.” It says that it “can in principle”.
- 2.5. Consequently, our clients’ view is that whether it can count is a matter for a decision maker with access to all of the relevant information: here, there is access to some but not all of the relevant information.
- 2.6. Paragraph 37 of EXM-07h (with Footnotes) sets out the Council’s and Exeter University’s positions’ in relation to student numbers at Exeter University. In short, exact student numbers are a secret between the Council and the University.
- 2.7. However, from the Local Plan (Paragraph 6.54) we can see the Council’s take on the number of full time students at the University campuses: 27,280 in 2021/22 up from 11,170 in 2006/7.

- 2.8. Whilst the University reported that there were 27,276 FTE students based at its Streatham and St Luke's campuses last year, a Freedom of Information (FoI) request found that there were 39,450 students based at the campuses last year.
- 2.9. It follows that we cannot be certain on the number of students at Exeter University.
- 2.10. And we need to be certain of the number to carry out subsequent calculations with any degree of accuracy.
- 2.11. Mr Justice Hickinbotham's Judgement (which was about Exeter) from 2015, confirms that PBSA may be included in 5 year housing land supply calculations if its provision (e.g.) releases (or released) housing that had been used by students into the general housing market; for Exeter key indicators are housing delivery and student numbers at the University.

3. Conclusion

- 3.1. Our clients' view is that, if, for example, student numbers were stable or falling at Exeter University and the Council had met or over delivered housing against its requirements, then it would be reasonable to include PBSA in the housing supply figures.
- 3.2. However, in looking at housing delivery and supply holistically, it is difficult to see how the Council would be justified in including it.
- 3.3. If it wants to try to do so, it has to release accurate student numbers in conjunction with the University so that subsequent, necessary, calculations can be carried out with any degree of accuracy, especially because such calculations would probably affect the overall housing requirement.

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