



[REDACTED]
Exeter City Council

13 February 2026

Ref.: Optional Hearing Statement – H6 Co-Living, Matter 7 Issue 2 Q1-2 (p.18)

The examiners' questions in this section open up new aspects which we find are not covered sufficiently in Policy H6 in the Regulation 19 version. More recent planning applications highlight some of these aspects further.

Q1. What are the identified needs for housing for older people, build-to-rent housing and co-living housing in Exeter and how will these respective needs be met over the plan period?

Summary of Concern

The Plan increasingly appears to rely on co-living to meet housing targets. Evidence shows these models do not address Exeter's identified housing needs, particularly for older people, families, and households requiring accessible homes. Without clear safeguards, co-living risks crowding out family-sized housing, delivering substandard units, and prioritising numerical targets over genuinely liveable homes.

Evidence from the Local Housing Needs Assessment (2024) ¹

- The LHNA identifies a significantly greater need for 2–3 bedroom homes than for one-bed or studio units.
- Future growth in single-person households is projected to be concentrated among those aged 75+, a group for whom co-living is generally unsuitable.
- LHNA explicitly states:

¹ https://exeter.gov.uk/media/karozwx5/evb-h-01a_2024-exeter-local-housing-needs-assessment.pdf

“The household projections therefore envisage little role for co-living housing and this is reflected in the LHNA’s modelled size and tenure mix.” ²

Despite this, planning applications demonstrate a marked increase and percentage in co-living proposals coming forward and being permitted, suggesting a reliance on these forms to meet housing delivery targets.

Co-living Numbers - Built and In Planning or Consultation:

Co-Living - Built

The Gorge	134
TOTAL	134

Co-Living - Approved Not Yet Built

Exland House, Tudor Street	34
Summerland St/Red Lion Lane	145
Harlequins	383
Haven Banks/Water Lane - outline	184
Heavitree Rd Police Station	414
TOTAL	1,160

Co-Living – In planning or consultation

Mary Arches	297
TOTAL	297

Total Co-Living -Built	134
Total Co-Living Not Yet Built	1,457
Total Co-Living	1,591

LHNA housing needs vs provision – understood from available documents:

	Needs	Built/Planning/Consultation	% of need
Co-living units/1-bed	2,007 ³	1591	80% of need
2 to 4+ bedroom (C3 typology total)	10,556 ⁴	3,263 ⁵	31% of need

² https://exeter.gov.uk/media/karozwx5/evb-h-01a_2024-exeter-local-housing-needs-assessment.pdf - section 44. Co-Living

³ <https://exeter.gov.uk/media/rmxblobz/2024-exeter-local-housing-needs-assessment.pdf> figure 5, p.11 (omitting 1-bed)

⁴ <https://exeter.gov.uk/media/rmxblobz/2024-exeter-local-housing-needs-assessment.pdf> figure 5 p.11

⁵ <https://exeter.gov.uk/media/h0tf2mee/2024-five-year-housing-land-supply-statement.pdf> table 4 = 3582 - 319 PBSA = 3263

Key Issues

- **Design and Quality:** Units are often very small, with constrained communal spaces; some proposals submitted recently include 40-bed clusters sharing a single kitchen, functionally inadequate for long-term living.
- **Policy Gaps:** Current Plan wording does not require co-living to meet space, amenity, or accessibility standards and does not limit overall delivery, risking oversupply.
- **Strategic Imbalance:** Co-living is targeted at younger adults, leaving older single-person households underserved, despite projected demographic growth.

It is also notable that London and Liverpool have adopted specific SPDs for co-living and/or aligned them with the residential housing standards, recognising the need for clear quality and supply controls.

Conclusion and Modifications Sought

We request:

1. **Minimum internal space and amenity standards** for co-living units – ideally aligned to Exeter residential housing standards for all units designed for long-term living/homes.
2. **Limits on the proportion of co-living units per site or ward** to ensure a balanced housing mix.
3. **Accessible and age-appropriate design requirements** for long-term occupancy.
4. **Align co-living delivery with LHNA evidence**, prioritising 2–3 bedroom homes and housing for older single-person households.

This will ensure that co-living complements rather than dominates Exeter's housing supply, supporting genuinely liveable, sustainable communities.

Q2. How would co-living housing provide 'high quality accommodation'? Should Policy H6 include minimum communal room sizes and functional definitions for these spaces? Would co-living housing be expected to meet the needs of people with disabilities? Is Policy H6 sufficiently clear and effective in these regards?

Summary of Concern

Different high-density housing typologies, such as co-living, PBSA, build-to-rent, and cluster rooms, are being delivered with similar layouts but marketed to different groups. While PBSA is primarily short-term student accommodation, other typologies

often provide full-time homes. Therefore, design quality, internal space standards, and residential amenity should reflect their role as permanent homes.

Currently, there is no specific SPD for co-living, and it is unclear whether the *Residential Design SPD* applies to these developments – though the Foreword states that ‘this Supplementary Planning Document provides guidance for all those involved in building new homes in Exeter’⁶

Co-living units are not currently treated as needing to meet the Residential Design Standards but are however counted toward overall housing delivery, creating a risk that they are treated as exceptions and deliver lower-quality accommodation than required of conventional housing.

Evidence and Examples of recent planning submissions:

- **Clarendon House (PBSA / cluster rooms):**
 - Proposed cluster rooms are 13sqm, smaller than typical studios.
 - Larger 18sqm studios are often restricted from accessing shared kitchens to justify density.
 - This demonstrates a strategy to maximize rental yield at the expense of usability and amenity.
- **Marys Arches**
 - 18sqm studios with no kitchens, highlighting inconsistencies in design and functional provision.
 - One kitchen per 27 residents (across the whole scheme).
- **Former Heavitree Police and Magistrate Court site**
 - 17.5sqm - 28 sqm studios
 - One kitchen per 12-26 residents (across the whole scheme).
- **Former Unit 1 Nightclub Summerland Street And 2 Verney Street (Best Tyres) Exeter EX1 2AZ 25/1817/ FUL”**
 - 18sqm studios the same as Heavitree Rd and Clarendon House (they all use the same template)
 - No shared kitchens at all. They have a “Tea Point” in the lounge area for “light meals”.

The above cases reflect an absence of policy guidance, allowing developers to prioritize density and rent returns over quality.

⁶ <https://exeter.gov.uk/media/zt2a1sxl/residential-design-spd.pdf>

Without explicit policy or SPD guidance for co-living, developers can exploit gaps in standards, leading to substandard housing being counted toward delivery targets.

Key Issues:

Lack of clarity in SPD application:

- The Residential Design SPD should explicitly apply to co-living units, including both private and shared spaces.
- Failure to do so undermines design quality, internal space standards, and residential amenity.

Policy gaps leading to reduced standards:

- Developers can create smaller units and high-density layouts (13–18sqm studios) and manipulate shared facilities ratios to meet housing targets.
- This represents a policy loophole, allowing delivery numbers to be met while sacrificing liveability and long-term suitability.

Strategic implications:

- Treating co-living as an exception risks normalizing substandard housing, undermining the Council's aim to provide high-quality, sustainable homes.
- All forms of long-term housing contributing to delivery quantum should comply with the same design standards to ensure consistency, effectiveness, and soundness of the Plan.

Proposed Modifications:

1. Residential SPD amendment:

- Explicitly state that all residential design standards apply to co-living developments, including private units and shared spaces.
- Given the changing nature of PBSA/co-living demands across the city ensure that development show future adaptability to C3 units if required.

2. Minimum internal space and amenity standards:

- Ensure units meet or exceed national space standards, and shared facilities are functionally adequate for the age and number of residents.

3. Monitoring and enforcement:

- Include a mechanism to review co-living / cluster room delivery against housing quality standards, ensuring they contribute meaningfully to housing supply without compromising amenity.

Kind regards,



Member, Strategic Planning & Highways Group