

Exeter Plan Hearing Day 6: Wednesday 11 March 2026

Matter 7 - Meeting Housing Needs

Issue 2 – Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12

Statement on behalf of Exeter St James Community Trust (R Connett)

Q3. How have the effects of the development and potential overconcentration of co-living housing, houses in multiple occupation and/or purpose-built student accommodation on the residential amenity of existing residents and communities been considered in the formulation of Policies H6, H10 and H12? Are the policies sufficiently clear and effective in this regard?

Q9. How has the Exeter St James Neighbourhood Plan and its principle of ‘community balance’ been considered in the formulation of these policies?

Exeter St James Community Trust contends that the effects of the development and potential overconcentration of co-living, HMO and PBSA on the residential amenity of existing residents of the community of St James has been overlooked in the formulation of these policies.

The severe imbalance resulting from well over 50% of the total population being in the 19 – 25 age demographic, nearly all students who are transient residents while they study in Exeter has many negative impacts that have been well-documented in Exeter, as they are when repeated around the country in studentified neighbourhoods.

Despite the Article 4 Direction, Local Plan Policy H5b, and the Neighbourhood Plan Sustainable Development policies 1 and 3, and Community policies 1, 2 and 3, the demographic imbalance that the NP was explicitly designed to reverse, has steadily worsened.

The most recent Article 4 Direction Review and HMO SPD consultation provided evidence confirming the community’s conviction that ECC has abandoned St James and our NP aim. Referring to St James as the ‘Student Quarter’ it suggested that some further streets within St James, beyond the existing nine, might need to be made exempt from the Article 4 Direction in order that streets in adjacent neighbourhoods could be included.

Sacrificing this hollowed-out neighbourhood to meet the needs of the relentless, seemingly uncontrolled growth of the University, is not good for students or settled residents alike. Following the NP’s successful referendum, the Student Guild director who had attended Exeter St James Forum’s Steering Group meetings, wrote to congratulate the Forum stating that the result was exactly what was needed for St James.

At 1:15 Exeter Plan acknowledges St James’ NP as the sole such plan within Exeter’s Development Plan, and its continuing role in helping *‘to ensure that, as Exeter expands, it will keep its distinct identity and continue to serve its citizens’ needs’*.

What does ECC consider the distinct identity of St James to be? The community has not given up on the NP and refuses to accept the description of Student Quarter mentioned above.

The NP continues to serve as the ‘joined-up’ planning policy specifically addressing the statutorily designated neighbourhood area of St James. It came about because the local community had a vision for strengthening and reinvigorating St James through a positively prepared planning policy that would steer the community’s desired transformational change into a vibrant neighbourhood

with a balanced and diverse community, in line with national and local planning policy, and at the most basic level, securing its long term sustainability.

When the NP was prepared, with advice and support of ECC planning officers, and examined, there was no indication that there would be any problem with the interpretation of the overarching aim of a balanced and diverse community or its related definition (NP p.25) of:

The term ‘community balance’ therefore refers to the desire of the residents of St James to have a diverse population which includes people at all stages of their lives and which is not dominated by a single group of the population.

However, ECC’s subsequent insistence that the lack of a robust definition for ‘community balance’ anywhere in ECC’s development plan policies or guidance allowing the refusal of proposals NP policies do not support, has resulted in great disappointment, and has contributed in no small part to the worsening of community imbalance, counter to the NP’s key aim.

The replacement with such a term as ‘mixed’ community is entirely unsatisfactory as a mix can be grossly imbalanced. Similarly, focus instead on the concentration of a particular housing type is problematic, firstly as it begs the question of how an over-concentration is to be identified, and secondly, as it does not serve as a useful proxy the all-important demographic data.

If development proposals that would increase still further the proportion of the 19 – 25 year old demographic living in St James are to be refused, then it is vital that the Exeter Plan policies or guidance provide the robust wording required not only to help achieve Exeter Vision 2040 as it relates to St James, but to meet the NPPF requirement of sustainable development.

In addition to the suggestions made in my representation and the matters above, I wish to discuss the following points:

- How will an overconcentration of PBSA / coliving in an area be determined? The summary student need assessment submitted by the applicant of 25/0318/FUL includes a diagram mapping the location of private PBSA across the city. Despite the cluster around the site location, it was decided that there was no overconcentration and this PBSA was approved.
- Why is there no consideration in H10 of the need for such sites to meet other housing needs and why is community balance not a consideration?
- Is it right that the objection from a nearby resident should be taken as evidence that the development site is within a mixed community area?
- In St James, where there is no evidence of PBSA returning HMOs to family homes, it cannot be right that PBSA units are counted as part of Exeter’s housing supply.

I look forward to discussing these matters further at the Hearing, on behalf of Exeter St James Community Trust.

