

EXAMINATION OF THE EXETER LOCAL PLAN

RESPONSE TO EXETER CITY COUNCIL'S 'PURPOSE-BUILT STUDENT ACCOMMODATION NOTE' (EXM-07H)

(MATTER 5 HOUSING LAND SUPPLY)

PREPARED FOR
WADDETON PARK LIMITED

June 2026



PCL Planning Ltd 13a-15a Old Park Avenue, Exeter,
Devon, EX1 3WD United Kingdom
t: + 44 (0)1392 363812
www.pclplanning.co.uk

1.0 Introduction

1.1 This further statement is submitted by PCL Planning Ltd on behalf of Waddeton Park Limited and relates to **Matter 5** (Housing Land Supply) as identified in the Inspectors' Matters, Issues and Questions (MIQs). It comments on the Council's subsequent note (EXM-07h) regarding purpose-built student accommodation (PBSA) that was requested by the Inspectors during the Matter 5 Hearing session.

1.2 Our response should be read in conjunction with our original Matter 5 Hearing Statement and other objections raised to the emerging local plan as set out in our other Matter Hearing statements. In summary, these include the following issues relevant to land supply considerations:

- The over reliance on complex large strategic brownfield sites for planned housing delivery across the Plan period without any robust assessment of the clear obstacles to delivery (including existing use value, relocation, remediation and viability).
- The brownfield focus has prejudiced Council's approach towards site selection based on an incorrect view that there is no longer capacity at the urban fringe. Instead, a blanket approach to landscape setting has been taken.
- The limited housing choices that the ELP provides for as a result of the strategic brownfield focus, with a narrow focus on flatted development, PBSA and Co-living not providing for the wider housing needs of the City and constraining the delivery of affordable housing.
- There is no convincing evidence provided as part of the ELP and evidence base that the housing requirement will be met at the end of the plan period and that a 5-year supply of housing can be maintained. This is because of the uncertainties of the delivery of the strategic brownfield sites that the Plan is heavily reliant on. Furthermore, there remains

significant questions regarding how the Council has calculated its supply figures, particularly in respect of PBSA.

2.0 Response to Exeter City Council Purpose-Built Student Accommodation Note, April 2026 (EXM-07h)

- 2.1 Following the Matter 5 Hearings, Exeter City Council (ECC) has prepared and published a note at the Inspectors' request addressing how it considers Purpose-build Student Accommodation (PBSA) contributes to the housing land supply. This is document EXM-07h in respect of the Examination library.

Additional Evidence

- 2.2 Whilst it is correct that a note was requested by the Inspectors at the Matter 5 Hearing regarding their approach to PBSA including the ratio used and how it has been calculated in terms of housing land supply, it was our understanding that the Inspectors at the Hearing requested some evidence to demonstrate that PBSA allows general market housing to remain in such use, rather than just assume all new PBSA automatically does this, as the Council's paper implies. Our recollection was that evidence relating to matters such as HMO licencing etc were to be provided. This was in the context of a discussion where participants raised concerns that despite PBSA completions the number of new student HMOs were increasing, therefore implying that general market housing was not being released or remaining in that use.
- 2.3 The Council's paper provides no additional evidence to support its position that all PBSA (to a threshold of at least 15,000 PBSA bedspaces) should be counted in its housing land supply regardless of other supply and demand effects the student population is having on the wider general housing market. Student council tax exemptions are narrowly drawn upon, although it is generally recognised that these under represent the number of students

within market housing on the basis of the limited take up of the exemption by student households.

- 2.4 That said, PCL Planning obtained data on student exemptions from the Council via a Freedom of Information request in February 2026. This identified that as of May 2025 that there were 5,436 'Class N' exemptions. Class N is defined as a dwelling which is occupied only by students, the foreign spouses of students, or school or college leavers. It is understood that this is the data provided to central government as at 31st May each year. This suggests more than twice the number of student properties than the Council has identified in Table 1 of EXM-07h as having a council tax exemption.
- 2.5 We are concerned that there appears to be a significant discrepancy between the data provided by the Council as an annual return and that presented within EXM-07h. This all points to a great deal of uncertainty regarding the Council's evidence base in relation to the impacts of the City's student population on the general housing market.

Overreliance of PBSA on Strategic Allocations

- 2.4 As raised in our Matter 5 Hearing Statement, in addition to the fact that the housing supply is already over-reliant on PBSA, we are concerned that there is no protection from PBSA becoming the dominant form of housing on the allocated sites. Policy H10 prescribes a range of criteria for PBSA, with the geographical restrictions identifying that it is supported on the University of Exeter campus, in the city centre, or in areas within controlled parking zone well connected to the campus and facilities. This effectively supports the delivery of PBSA on all 5 of the Strategic Mixed-Use allocations, as well as other non-strategic development opportunities in Exeter.
- 2.5 The Council's lack of recognition of the wider impacts of an overreliance on PBSA in terms of housing land supply would be at the expense of meeting Exeter's general housing need (as has happened to date) resulting in inflationary pressure in the housing market and a lack of delivery of

affordable housing. This simply cannot be right both in terms of the interpretation of the PPG and for the creation of mixed and balanced communities.

Conversion Ratio

- 2.6 At the Matter 5 Hearing, PCL Planning on behalf of Waddeton Park gave evidence outlining the inconsistency in the Council's approach regarding the ratio to be applied for student accommodation in respect of calculating land supply with the emerging Local Plan identifying a 1.8:1 ratio, its evidence bases identifying a 2.5:1 ratio and 5YHLS report identifying a 2.4:1 ratio. The point was made that the Council in considering the conversion ratio that should be used had failed to reflect the PPG and local circumstances. Instead, an Exeter local ratio (3.73:1), that reflects the average size of a student only household should be used, particularly as this is significantly above the average for England (2.4:1).
- 2.7 In EXM-07h, the Council argues that PBSA student accommodation should be counted towards the housing supply on the basis of a 1:1 ratio for studio flats; and a ratio for other student accommodation of 2.4:1 from 2025 onwards, on the basis of the latest Housing Delivery Test Rulebook. The Council argues that it has not been able to calculate or use an Exeter specific ratio (as ONS has not released these on its website) and the PPG does not require the use of a local ratio.
- 2.8 The relevant paragraph in the PPG¹ is quoted in Para 2.1 of the Council's Paper. It does not direct LPAs to use the Housing Delivery Test Rulebook which provides a national ratio of 'total students living in student only households to the number of student only households in England' using 2021 Census data.² It could have done so if that had been Government's intention.

¹ ID: 68-034-20190722

² HDT Rulebook, Para 10

- 2.9 Instead it directs that LPAs will need to undertake their own calculations 'using published census data.' Indeed the PPG includes a hyperlink to locally specific data which would not be necessary if the Government intended LPAs to use a single national ratio.
- 2.10 It is both rational and logical that Council's should undertake a calculation using data for its own area, not least as it is the locally specific ratio which is relevant to the amount of accommodation in the wider housing market which is retained/released.
- 2.11 The Council asserts at Para 2.9 in the Note that the ONS has not released the ratios on its website. This is not correct or accurate. The locally-specific ratio for Exeter is readily available from Census Commissioned Table CT21_0398 which is available [here](#)³. This is the equivalent data to that shown in the PPG hyperlink.
- 2.12 The 2021 Census data shows the number of students living in student only households. Our analysis of this data (supported by the economics team at Icen Projects) below shows an average of 3.73 students per 'student only household' in Exeter based on 2021 Census data as shown in Table 1 below.
- 2.13 This confirms that the Census data indicates that the average size of student only households in Exeter is significantly larger than is the case across England.
- 2.14 The NPPF in Para 32 makes clear that policies and plans should be underpinned by relevant and up-to-date evidence. The 2021 Census data above is specific to Exeter, is up-to-date, and is relevant to the plan period (which began in 2021). We contend that this ratio should therefore be used for calculations across the plan period.

3

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/2853ct210398census2021>

Table 1: Calculation of Students in Student Only Households in Exeter, 2021

	Student only Households	Students
1 student in household	461	461
2 students in household	363	726
3 students in household	290	870
4 students in household	446	1784
5 students in household	413	2065
6 students in household	311	1866
7 students in household	105	735
8 students in household	50	400
9 students in household	30	270
10 or more students in household	6	60
Total	2,475	9,237
Average students per household	3.73	

Source: 2021 Census Commissioned Table CT21_0398/ Icen1

- 2.15 We agree that Para 6.63 of the supporting text to Policy H10 requires updating, but to be consistent with the PPG this should use the 2021 Census data for Exeter and should therefore read:

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 3.73:1, based on 2021 Census data.

Amount of PBSA in the Trajectory

- 2.16 In Table 2 of EXM-07h the Council has presented a dwelling equivalent to reflect its approach to counting studio flats on a 1:1 basis and applying conversion ratios of 2.4 and 2.5 to all other forms of PBSA. This equates to dwelling equivalent supply of 3,135 from PBSA in total over the Plan period (2022-2042).
- 2.17 As shown in our Table 2 below, (based on the Council's dwelling pipeline figures with the **3.73** students per dwelling ratio for PBSA bedspaces and

1:1 ratio for studio flats applied) the total dwelling equivalent supply equates to 1,680 over the plan period (2022-2042). This represents a significant reduction from the 3,135 dwellings indicated by the Council in EXM-07h.

Table 2: PBSA Supply (2022-2042)

Site	Studios	Beds	Dwelling equivalents included in supply
Student Accommodation			
Water Lane (South)		980	263
The King Billy & 26-28 Longbrook St		108	29
West Park, University of Exeter		1290	346
36-38 High Street		24	6.4
Apparel Master, Cowley Bridge Road	154	196	207
68-72 Howell Road		26	7.0
Housing allocations			
East Gate: Clarendon House	134	29	142
Heavitree Road Police Station	399	414	510
Red Cow*	442		118
Rougemont Switching Centre*	86		23
Land at Exeter Squash Club*	48		13
Land & buildings at Victoria St*	47		13
Fever & Boutique*	15		4
Total			1,680

Source: Icen analysis, Exeter PBSA Student Accommodation Note, 2026.

*Figures according to the allocation estimation.

- 2.18 This clearly emphasises the importance of applying an appropriate conversion ratio and the implications this has on calculating housing land supply and how the Plan addresses its housing requirement. As set out in the above section we believe the correct approach must be to consider relevant and up to date information and in line with the PPG take local circumstances into account.
- 2.19 As it is clear from such evidence that the average size of student only households in Exeter is significantly larger than the national picture and that locally specific data is available, it cannot be reasonable to rely on anything other than a locally specific ratio. Otherwise, it would clearly be contrary to the PPG tests as the extent that PBSA releases general market housing and/or that it enables general market housing to remain in such use would be significantly over estimated and at odds with the realities of what is happening in Exeter.

3.0 Conclusion

- 3.1 Having reviewed the Council's further evidence to support its position regarding the calculation of PBSA within housing land supply outlined in EXM-07h, several concerns remain.
- 3.2 Firstly, it does not provide any wider evidence of the supply and demand effects the student population is having on the wider general housing market. This includes not addressing concerns raised at the Hearing regarding the rise in student HMOs and the suggestion that such evidence would be made available.
- 3.3 Secondly, it draws on student council tax exemption data which is known to be unreliable and unrepresentative for all student households. Furthermore there appear to be significant discrepancies between data the Council has previously shared on this under an FOI request and what is

presented in EXM-07h. This suggests the extent of student households in general housing market may have been underestimated.

- 2.5 Thirdly, we remain very concerned regarding the lack of check and balances within the Plan to safeguard against an over reliance on PBSA in meeting the housing requirement. This includes the wide support the Plan implies for the delivery of PBSA on the strategic allocations and other development opportunities in Exeter.
- 2.6 Fourthly, contrary to the position set out by the Council in EXM-07h, census data is available to enable a locally specific ratio for Exeter. This provides clear support for applying a conversion ratio of 3.73:1 which reflects the fact that the average size of student only households in Exeter is significantly above the average for England.
- 2.7 Finally, we have illustrated the different effects of applying a ratio based on the national average student household size and a ratio specific to Exeter's local circumstances. This demonstrates that the Council's approach will significantly over estimate the extent that PBSA releases general market housing and/or enables it to remain in such use. This will be to the detriment of providing sufficient housing to meet a wide variety of local needs across the Plan period.