

Full Name

Robyn Connett

Organisation (where relevant)

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Chapter of the Exeter Plan

Chapter 6 - Homes

1. To which part of this chapter does this representation relate? (Representations must be made on a specific policy or paragraph within the section and this should be specified in the below).

H10: Purpose built student accommodation

2. Do you consider that this part of the chapter is legally compliant?

Yes

2.a. If yes, and you wish to support the legal compliance of this part of the chapter, please use this box to set out your comments.

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2.b. If no, please give details of why you consider this part of the chapter is not legally compliant. Please be as precise as possible.

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2.c. Please set out the modification(s) you consider necessary to make this part of the chapter legally compliant, in respect of any legal compliance matters you have identified at 2.b above. You will need to say why each modification will make this part of the chapter

legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

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3. Do you consider that this part of the chapter is sound?

No

3.a. If yes, and you wish to support the soundness of this part of the chapter, please use this box to set out your comments.

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3.b. If no, please give details of why you consider this part of the chapter is unsound. Please be as precise as possible.

6.56 The approach to supporting purpose built student accommodation in appropriate locations goes hand in hand with the City Councils planning policy on houses in multiple occupation (HMOs) and the associated Article 4 Direction. The Article 4 Direction restricts the ability to convert regular houses into HMOs, which are often occupied by students, and thereby seeks to encourage students to live in purpose built student accommodation. The restriction covers an area close to the University of Exeters Streatham and St Lukes campuses and has recently been extended.

6.57 Given the City Councils net zero ambitions, purpose built student accommodation should be located where students day-to-day needs can be met without using a private car and with good connections to the University campuses. Consideration will be given to the potential local impacts of development so that potential issues for amenity are avoided and addressed appropriately in the context of the importance of mixed communities.

The final sentence of 6.57 mentions the importance only of MIXED communities. The omission of the adjective ~balanced, used previously in Local Plan Policy H5b, is significant. The LPA has frequently cited the lack of definition for ~community balance in its policies as the reason for being unable to refuse applications, yet the concept of a ~mixed community is inadequate. Communities dominated by students (more than 50% of the population across the whole of St James for example), are mixed, but so severely imbalanced that their very sustainability is at stake.

The NPPF refers at 64b (the context of affordable housing is irrelevant to my argument) to an ~approach contributes to the objective of creating mixed and balanced communities.

If the NPPF uses the term balanced communities, the LPA should have confidence to keep the term in its new Plan.

The locations being considered as appropriate are those which tend to be characterised already by over-concentrations of student HMOs, with the well-established (nationally and locally) negative effects of community imbalance which threatens the sustainability of a community. A major part of the rationale for PBSA is the claim that they will result in the return of HMOs to C3 family homes, thereby helping to rebalance impacted communities.

However, ECCs own evidence eg as presented in the consultation materials for the recent HMO SPD and Article 4 Direction Review, PBSA has not resulted in any such return of HMOs to C3. As a result, the community has become even more severely imbalanced as it matters not where students live “ they all contribute to the local population percentage of the 19 “ 25yr demographic.

As the locations

3.c. Please set out the modification(s) you consider necessary to make this part of the chapter sound, in respect of any soundness matters you have identified at 3.b above. You will need to say why each modification will make this part of the chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.

Insert 'and balanced' after 'mixed' at 6.57

Include a clause that PBSA will be permitted in A4D areas, if there is clear evidence of return of HMOs to C3.

4. Do you consider that this part of the chapter complies with the Duty to Co-operate?

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4.a. If yes, and you wish to support this part of the chapter's compliance with the duty to co-operate, please use this box to set out your comments.

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4.b. If no, please give details of why you consider this part of the chapter fails to comply with the duty to co-operate. Please be as precise as possible.

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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