

Exeter Plan

Rebuttal of EXM-34, EXM-35 and EXM-36

Matter 5: Issue 1: Total Housing Land Supply

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1.0 Introduction

- 1.1 This note rebuts certain assertions made in EXM-34, EXM-35 and EXM-36, which have been submitted to the Examination by participants in response to the Council's Purpose-Built Student Accommodation (PBSA) Note (EXM-07h).
- 1.2 The Council's position on all other assertions made in EXM-34, EXM-35 and EXM-36 has already been set out in other examination documents and during relevant Hearing sessions.

2.0 Rebuttal of EXM-34, EXM-35 and EXM-36

Rebuttal points relating to “release” of housing stock into the market as a result of PBSA provision

- In EXM-07h, the Council has presented student Council Tax exemption data as evidence that homes previously occupied by students have been released into the general market. The Council has done so because this was requested by the Inspectors during the Hearing session for Matter 5. However, the existence and extent of the release does not signify. That is because the Council does not propose to count PBSA based on “the amount of accommodation that new student housing releases in the wider housing market”. Instead, the Council proposes to count PBSA towards the housing supply based on “the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation”. This method is allowed by Planning Practice Guidance (PPG) (see EXM-07h: paragraphs 2.1 and 2.2, page 4) and is supported by evidence in the 2024 Greater Exeter Student Housing Needs Assessment (EVB-H-01d) of the significant extent to which students are reflected in Exeter’s housing requirement.
- Paragraph 2.11 of EXM-36 refers to a High Court Judgment dating from 2015, at a time when PPG advised that PBSA should only be counted in the housing supply if there was evidence of market homes being released from student occupation. Advice in the PPG has changed since the High Court Judgment was made, as set out in EXM-07h (paragraphs 2.1 and 2.2).

Notwithstanding this point:

- Table 1 of EXM-07h (page 5) provides robust data on the number of general housing market properties (including but not limited to HMOs) in January 2021, September 2022 and October 2025 that benefitted from student Council Tax Exemption N (on grounds of being fully occupied by students). Data for 2023 and 2024 is not available and so is not presented in table 1. However, even if the number of general market homes benefiting from an Exemption N increased between 2022 and 2024, it is still the case that there was a net decrease in the number between 2022 and 2025. In conclusion, Council Tax data indicates that fewer general market homes were fully occupied by students in 2025 compared to 2022; it therefore provides

evidence of a release of general market homes from student occupation. However, as already stated, the Council is not relying on this argument.

- Paragraph 2.4 of EXB-34 refers to Council Tax data obtained from the Council in February 2026 via a Freedom of Information request. It should be noted that the figure of 5,346 properties includes ALL Exemption N properties, rather than JUST the number of Exemption N properties in the general housing market - i.e. the figure of 5,346 includes a considerable amount of privately-owned/managed PBSA. In contrast, Table 1 of EXM-07h shows that only 2,300 general market properties benefited from Exemption N in October 2025.
- Whilst student Council Tax exemption data may not fully account for every general market property occupied by students, it is a suitable and proportionate proxy source of data for this metric. This is particularly the case given the unfeasibility (in terms of a reasonable use of Council resources and potential data protection issues) of undertaking “on the ground” research into the occupation of every home in the city.
- In terms of HMOs, it is feasible that HMOs previously fully occupied by students are now occupied by non-students, rather than returned to “family housing.” This would help explain comments made at the Hearings by other participants, that they have not observed any recent decline in HMO numbers.
- HMO licence data is not a robust or appropriate source of information about student housing. Many licenced HMOs in the city are not occupied by students, whilst the majority of (if not all) licenced HMOs that are fully occupied by students are generally accounted for in the Council Tax exemption data. Ultimately, Council Tax data is the most robust, suitable and proportionate source of information available to show the number of general market properties occupied by students.

Rebuttal points relating to students in need of accommodation

- Paragraph 15 and figure 1 (column 4) of the Greater Exeter Student Housing Needs Assessment (EVB-H-01d: page 7) show the number University students who required accommodation between 2006-07 and 2021/22. This data is accurate and robust. The data referred to in paragraph 2.8 of EXM-36 (obtained through a Freedom of Information request for use in a local newspaper article) does not accurately or robustly demonstrate the past

need for student accommodation in Exeter. The reasons for this are provided in the Council's Housing Topic Paper (TOP-01: paragraph 2.32, page 10).

- The Council's Post-Submission Purpose Built Student Accommodation (PBSA) Note (EXM-07h: paragraph) clearly sets out that the University expects the number of students needing accommodation in Exeter to increase by c.2,160 between 2024/25 and 2030/31. There is no secrecy by the Council or the University on this point.

Rebuttal point relating to overreliance of PBSA

- The Council does not consider that the Plan is over-reliant on the provision of PBSA, as set out in its Matter 5 Hearing Statement (CS-5: paragraphs 2.9-2.15, pages 7-8) and again in EXM-07 (paragraphs 3.1-3.7, pages 8-9. Main modification SMM50 (CSD-03: page 20) will help to ensure that PBSA does not become the dominant form of housing on allocated sites.

Rebuttal point relating to the housing trajectory and five-year housing land supply

- A number of sites included by the Council in the housing trajectory (EVB-H-03) and the five-year housing land supply (EVB-H-04a) were discussed during the Hearing sessions. The Inspectors agreed that one site should be removed from the trajectory (Haven Banks Retail Park). However, the Inspectors did not instruct the Council to remove any sites from the five-year housing land supply.

3.0 Conclusion

- 3.1 The Council requests that its rebuttal of points made in EXM-34, EXM-35 and EXM-36 are considered by the Inspectors as Examination evidence.