

APPENDIX 1

Mr J W Nicholls	Supports SPG. Proposes no more students in the areas concerned, no students cars unless off road, and lets should be charged as business rates. <i>Noted, although the limitations of the planning system need to be recognised.</i>
Andrew Mowll and Brian George	Supports SPG. Share concern regarding changes to character of neighbourhoods and impacts of car parking. <i>Noted.</i>
Brian George	Supports SPG. Share concern regarding changes to character of neighbourhoods and impacts of car parking <i>Noted.</i>
Dr David Treharne	Supports SPG. Area of Union Road and Culverland Close is omitted from proposals. Representation identifies problems of noise, litter, and damage to cars. Also concern expressed regarding enforcement of this guidance. University should play more proactive role in provision of student accommodation which should be centred around Stratham Campus. This issue should be dealt with as a multi agency matter. <i>The data on exemption from Council Tax does not justify an extension to the SPG area to cover Culverland Close and Union Road.</i> <i>The University will continue to play a proactive role in the provision of student accommodation.</i>
Mr M Haste	Supports Proposals. Area of Union Road and Culverland Close omitted from proposals. Representation identifies problems of noise, litter, and damage to cars. Also concern expressed regarding enforcement of regulations. University should play more proactive role in provision of student accommodation which could be centred around Stratham Campus. This issue should be dealt with as a multi agency matter. <i>The data on exemption from Council Tax does not justify an extension to the SPG area to cover Culverland Close and Union Road.</i> <i>The University will continue to play a proactive role in the provision of student accommodation.</i>
Exeter Estate Agents Association Chair and Cardens Estate Agents	Objects to SPG. Could create a bubble in the housing market. Suggests that houses in high density student areas without the prospect of student occupation would lose value. A scenario whereby every sale in these areas would become subject to planning permission being obtained for student use would slow down the house selling process. <i>It is not considered that the SPG will have a significant impact upon house prices and as the SPG will not affect whether planning permission is required there should be no impact on the speed of house sales.</i>
David Roberts	Supports SPG. Suggests that there needs to be a requirement rather than guidance if aims are to be fully effective. Will future appeal inspectors take note of guidance.

	<i>Noted – The introduction of the SPG will provide guidance on the interpretation of Policy H5. The Policy approach will be reviewed as part of the production of the Local Development Framework.</i>
Mike Dugdale	Comments regarding parking of cars and questions whether it would be possible to link the issue of Residential Parking Permits to the payment of Council Tax for a given dwelling. <i>The Exeter Residents' Parking Scheme is administered by Exeter City Council on behalf of Devon County Council – permits are currently limited by supply but allocation criteria do not differentiate between different types of Exeter resident.</i>
Diane Boston and Ian Hodgson	Supports proposals and make additional suggestions regarding initiatives, partnership working and ‘place shaping’. <i>Noted.</i>
Devon County Council	Support suggestion that the University significantly improve their commitment to sustainable travel. <i>Noted.</i>
G Pearson	Intentions are worthy but too late and misdirected. The neighbourhoods targeted are already lost – the need now is to protect the neighbourhoods next in line. The Council needs to enlarge the areas subject to restriction. Suggests that City Council contest the University expansion or insist that the University houses all or most of these new students on its campus. <i>This guidance is focused on achieving a mix of uses in areas that already have a high concentration of student accommodation – the proposed guidance can be justified within these areas but would not be so well founded in areas with lower concentrations of students.</i> <i>The University will continue to play a proactive role in the provision of student accommodation. It is not Council policy to contest the expansion of the University.</i>
Katy and Dick Brownridge	Very much welcome this new initiative. It has proved effective elsewhere in the country and we look forward to the assertive maintenance of the balance of our very successful community. <i>Noted.</i>
Thornton Hill and West Avenue RA (THWARA)	THWARA fully supports the measures proposed within the draft SPG as a means of maintaining a mixed community throughout the year but suggests ‘The SPG should include the current Bishop Blackall Annexe building within the Powderham Crescent/Blackall Road (31%) area shown on the map within the draft SPG document dated August 2007.’ <i>Noted. The Bishop Blackall Annexe is a vacant building of local importance and a suitable use needs to be found to ensure this building is retained. As the building is well located in relation to the University, it would appear</i>

	<i>unreasonable to rule out student use.</i>
University of Exeter	<p>The University fully appreciates that pressures of student housing demand on areas within the City are generating concerns from residents. The guidance will not remove the underlying needs and demands for student accommodation. By adding additional constraints without attention to positive planning for student housing needs, the policy runs the risk of being ‘part of the problem’ rather than a positive planning measure.</p> <p>It is considered that Section 2 of the draft SPG lacks an explanation of how the acknowledged growth is to be accommodated in a planned manner and concludes somewhat arbitrarily that planning guidance would focus on one particular issue – that of achieving ‘a mixed community through the year’. This seems a highly questionable planning objective, not obviously related to the stated objectives of Local Plan Policy H5 or to national planning policy guidance, and tending to discourage any seasonally variable tenure.</p> <p>The policy will in practice affect only large properties and new build schemes. New build schemes offer opportunities to raise standards of accommodation and management. A policy that precludes such development but is unable to prevent further conversion of terraced housing does not seem particularly useful.</p> <p>For any policy to carry weight in planning decisions it must be robust. Establishing a robust boundary is difficult and there appears to be insufficient information to enable the Council to judge what constitutes a reasonable number of student houses in a particular area. The judgement for the proposed policy has been made on a proportional basis and as such appears to be simplistic. The University urges the Council to fully explore all the alternatives before defining fixed areas of control.</p> <p>The way in which the boundaries of the three areas have been established is questioned as they do not represent electoral wards and there appears to be no clear reason for their definition. Attention is drawn to the fact that Devonshire Place is not included in either of two areas and it is asked - how can this street alone not form part of the area for a ‘community based’ policy?</p> <p>The University questions the assumption that a figure of 25% or greater of homes with an exemption from Council Tax due to occupation by students produces an over-concentration. It is considered that these are areas close to the university that have considerable merits for student living. Where are the more suitable locations that student demands might be deflected to? Will they be further away and if so how will this relate to sustainability? And - Is ‘spreading the problems’ of student pressure to other areas preferable to better management and community relationship building within existing preferred locations.</p> <p>It is pointed out that the percentage of homes exempt from Council Tax is likely to change on an annual basis and as such the policy will require constant review.</p>

It is considered that The Exeter and Torbay housing Market Assessment 2007 does not provide reasonable justification for such a policy.

The University would hope to increase the number of on-campus bed spaces provided and work closely with the Council to ensure provision of privately managed accommodation off campus. This will be of benefit to local residents and the local housing market by reducing pressure on traditional market homes.

Purpose-built student accommodation is unlikely to give rise to the same issues as 'traditional' HMO's. As such the SPG seems flawed in its aims to prevent new, extensions to or conversions to student halls.

Finally it is suggested that the SPG is avoiding the issue of how and where to best accommodate an acknowledged demand for student accommodation. It is raising expectations amongst local residents that student demands can be 'controlled out' whereas in reality they must be properly planned for. By increasing 'protection' for particular areas that policy could transfer pressures from one community within Exeter to another in an unplanned way.

It is recognised that the guidance will not remove the underlying needs and demands for student accommodation. SPG was adopted in June of this year for the 'Expansion of University of Exeter' in recognition of the significant expansion of about 36% in student numbers over the next 10 years. The SPG consisted of nine general principles that would guide future student accommodation. This adopted guidance reflects the Council's positive approach to the issues arising from the provision of student accommodation and needs to be seen in conjunction with the current proposed SPG.

The Council will continue to work closely with Exeter University to ensure that the needs for student accommodation are met.

It is considered that the aim of achieving 'a mixed community throughout the year' makes a significant contribution to the character of a neighbourhood referred to in Policy H5. Accordingly it is considered that this is a reasonable planning objective for SPG.

The Council recognise the limitations of this guidance but consider that it will help to address the issue of student developments adversely affecting the character of particular areas or creating an imbalance in the local community.