



**EUTOPIA**  
HOMES

# **PLANNING STATEMENT**



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**Exmouth Junction Gateway, Exeter**

**Eutopia Homes**

September 2020

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# **PLANNING STATEMENT**

**EXMOUTH JUNCTION GATEWAY SITE,  
PRINCE CHARLES ROAD, EXETER**

**ON BEHALF OF EUTOPIA HOMES (EXMOUTH) LTD**



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## **1. INTRODUCTION**

- 1.1 This Statement is submitted in support of a planning application for full planning permission at the Exmouth Junction 'Gateway' site, Land off Prince Charles Road, Exeter, EX4 ("the site") on behalf of Eutopia Homes (Exmouth) Ltd ("the Applicant").

### **Background**

- 1.2 Members resolved to grant outline planning consent (ref 19/0650/OUT) in March 2020 for the construction of a mixed tenure residential housing development scheme involving 465 new homes (including 65 senior living with care flats), public open space, access road associated works (landscaping reserved for future consideration) at the Old Coal Yard, Exmouth Junction.
- 1.3 The S106 is due to be completed and a start on site is expected at the end of 2020 – subject to approval of reserved matters and clearance of pre-commencement planning conditions.
- 1.4 This Proposed Development site is vacant land at the entrance to the Exmouth Junction site. Owned by Network Rail, it became available for development last year and the applicant was offered the opportunity to acquire it. Given its prominent location from the west, it offers the opportunity to create a Gateway building into the main site at Exmouth Junction.

### **Proposals**

- 1.5 The Planning Application seeks planning permission for:

*"Redevelopment of the site and erection of a part 3, part 5 storey building containing 51 residential units with associated access and servicing arrangements, car parking, landscaping and infrastructure ancillary to the residential use."*

- 1.6 This Statement assesses the planning considerations associated with the development in the context of national, strategic and local planning policy and guidance.

- 1.7 The application comprises the following documents:



- Signed and dated planning application forms including Certificate B;
- CIL form;
- Architectural drawings prepared by Darling Associates;
- Design and Access Statement (including Lighting Assessment and Landscaping detail) prepared by Darling Associates;
- Planning Statement prepared by Eutopia Homes;
- Air Quality Assessment prepared by Syntegra;
- Ecological Impact Assessment prepared by Burton Reid Associates;
- Noise Assessment prepared by Syntegra;
- Energy Strategy Report prepared by Syntegra;
- Drainage Strategy prepared by Vectos;
- Site Waste Management Plan prepared by Syntegra;
- Transport Statement prepared by Vectos;
- Statement of Community Involvement prepared by Polity; and
- Geo – Environmental Assessment prepared by Fallon.

1.8 The Statement is also structured as follows:

- Section 2 describes the Site and its surroundings and planning history.
- Section 3 describes the development and pre-application engagement.
- Section 4 highlights the main national, strategic and local planning policy and guidance relevant to the determination of the application.
- Section 5 assesses the Proposed Development against relevant policy guidance and key tests.



**Eutopia Homes (Exmouth) Ltd**  
**Exmouth Junction Gateway Site, Prince Charles Road**  
**Planning Statement**

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- Section 6 sets out the draft S106 Heads of Terms and wider scheme economic benefits.
- Section 7 sets out the conclusions.



## **2. SITE CONTEXT**

- 2.1 The site is located within Pennsylvania Ward in Exeter, approximately 3km to the northwest of Exeter City Centre. It is bounded by Prince Charles Road to the north and east, a Morrisons supermarket to the south and the proposed Exmouth Junction redevelopment site to the west. The Prince Charles Road allotments are adjacent, to the west of the site. To the north of Prince Charles Road lies the Stoke Hill residential area.
- 2.2 The site currently comprises vacant land, comprising of an area of rough grassland (approximately 0.5 acre). It is accessed from the south-west of the roundabout junction between Prince Charles Road and the access road to the existing Morrisons Supermarket and petrol station. The access road will also serve the proposed Exmouth Junction redevelopment site.
- 2.3 Members resolved to grant outline planning consent (application ref. 19/0650/OUT) in March 2020 for the Exmouth Junction site. Redevelopment to provide a major mixed housing scheme, comprising 465 units, is proposed. The approved built form on this adjacent site is for 4 and 5 storey apartment blocks and 3 storey townhouses. A large Village Green, including a children's play area and other amenity areas are provided for the new community. Residential accommodation for older people is also proposed.
- 2.4 The Gateway site is in a highly sustainable location, given its proximity to Exeter City Centre, and the wide range of amenities located there. Within a 1 kilometre catchment of the site lies the northeast of Exeter City Centre which includes retail, employment, education and leisure provision. Within close proximity of the site are other important local amenities, including a supermarket, Mount Pleasant Health Centre, St James' Church, The Stoke Arms public house, and Stoke Hill Infants and Junior schools.
- 2.5 Several bus and train services are within easy reach, with the nearest bus stops only 400m from the site.
- 2.6 Its relatively central location also enables opportunities for walking and cycling and accessing public open space. Prince Charles Road running parallel with and on the other side of the allotments has been designated part of the E3 strategic cycle route



by Devon County Council, with dedicated cycle lanes, which connects the University of Exeter with Exeter Science Park and other key locations to the east of the City.

- 2.7 Overall, the site has a relatively good level of accessibility and public transport and cycling connections and in area which boasts good sustainability credentials.
- 2.8 No unit specific residential car parking is proposed, instead access to car club spaces are offered on site. This further promotes the use of walking, cycling, and public transport.

### **Site Allocations**

- 2.9 The site is vacant land and has no existing or previous use, it is unallocated and undesignated in the Local Plan First Review (2005). The site is in Flood Zone 1. There are no statutory protected heritage assets on the site or within the immediate vicinity. There are no planning constraints to development of the land.
- 2.10 Within the draft Exeter Development Delivery DPD1, the majority of the adjacent Exmouth Junction site is covered by an allocation for residential development. Draft Policy DD7 lists part of the Exmouth Junction site as being suitable for housing following its assessment in a SHLAA document.

### **Planning History**

- 2.11 There is no planning history associated with the site as it is a vacant plot of land. The land was historically part of the Exmouth Junction rail depot/former coal depot. After the depot's closure a large parcel of land was turned over to a supermarket. The Proposed Development site land was 'created' through the formation of a new roundabout and road access for the Morrisons supermarket, permitted in 2011 (ref: 11/1414).



### **3. PROPOSED DEVELOPMENT**

3.1 This full application seeks consent planning permission for:

*"Redevelopment of the site and erection of a part 3, part 5 storey building containing 51 residential units with associated access and servicing arrangements, car parking, landscaping and infrastructure ancillary to the residential use."*

3.2 The Proposed Development comprises the construction of a high-quality landmark building. The scheme provides a single residential apartment block of private rented accommodation comprising 51no. homes with a mix of 1, 2 and 3-bedroom dwellings. The schedule of accommodation is noted within the supporting Design and Access Statement (DAS) which should be read in conjunction with this Statement.

3.3 The Proposed Development, in terms of its architectural quality, acts as both a landmark, given its position on Prince Charles Road and a gateway to the Exmouth Junction site. Its design ties in with the permitted main Exmouth Junction site. The design has paid particular attention to the adjacent site (which Members resolved to grant planning permission for in March 2020). The architectural language of the Gateway block reads as part of the wider family of buildings within the Exmouth Junction site. All once completed will deliver a form of cumulative high-quality redevelopment within the locality.

3.4 The scheme will deliver 51no. additional homes, which is a significant benefit of the scheme given the site's good overall accessibility and its close proximity to Exeter City Centre and Exeter University. The Proposed Development offers the opportunity to optimise the potential of the site to deliver housing. Particular regard has been had to the wider context.

3.5 The Proposed Development comprises:

- 51 apartments (26 one-bedroom flats, 20 two-bedroom flats, and 5 three-bedroom flats) in an L shaped layout.
- The ground floor will feature a residents' entrance and communal amenity area, lift to all floors, plant space and internal bike and bin store.



- The allocation of communal amenity for the residents to the ground floor allows for the potential space to extend onto the external landscaping.
- External amenity roof terraces. The stepping back of the massing allows for these spaces to be provided at a distance from the adjacent allotments.
- As well as the communal internal ground floor space and the external roof terraces balconies for all units are provided and there is private outside space for some ground floor units.
- Over 100 cycle spaces. External (40) and internal bikes spaces (60).
- Car club spaces.
- Improvements around the entrance to the site to connect into existing cycle paths and widening existing footways for pedestrian access to Prince Charles Road.

### **Pre-Application**

- 3.6 Informal consultation with officers at Exeter City Council was held to discuss the principle of development of the vacant plot of land for residential use and the emerging design option for it. The principle of development for residential use was supported as was the approach to massing and height.
- 3.7 Additionally, direct pre-application consultation has been undertaken with Devon County Council to discuss highways and access. Further consultation has also been held with senior environmental officers to inform the technical assessments submitted in support of this application.
- 3.8 Due to the COVID-19 epidemic the applicant undertook to involve the local community and key stakeholders using virtual methods. An online consultation was publicised by means of a door-to-door hand delivered letter. Online feedback via the website was received from 11 members of the public online and a further separate 5 emails were received.
- 3.9 The principal issue raised by the local community related to off-site parking generation (consistent with feedback received during the community involvement



programme for the main Exmouth Junction site) and the proposals 'fitting in' with the local area.

- 3.10 Given that they are immediate neighbours to the site active steps were taken to contact the recognised Association representing the allotment holders. Following contact, a Zoom video briefing was organised and held with two members of the Association's committee. Key issues raised related to boundary treatments, potential for overshadowing, localised flooding and queries related to a proposed cycle route through the allotment land.
- 3.11 A virtual presentation to the Planning Members Working Group was made on 25<sup>th</sup> August 2020. At the time of submission of this application formal feedback from the session is still awaited.
- 3.12 A Statement of Community Involvement, produced by Polity, has been submitted with this application, this sets out the detail of the community engagement undertaken (given the COVID 19 epidemic circumstances) and the responses received.
- 3.13 The design evolution of the scheme is further explained in the DAS.
- 3.14 The Proposed Development, in terms of its architectural quality, has paid particular attention to the adjacent Exmouth Junction redevelopment (ref. 19/0650/OUT) which Members resolved to grant planning permission in March 2020. It ties in with those proposals and acts as a Gateway building to that scheme. The Proposed Development is brought forward by the same applicant.
- 3.15 The developer's team worked with officers and other bodies, such as the Design Review Panel, during an extensive pre-application phase to ensure that the design of the main Exmouth Junction scheme was high quality and appropriate for the site.
- 3.16 The Proposed Development offers the opportunity to optimise the potential of a vacant plot of land to deliver much needed housing. Officers have encouraged a high-density development in this location.



- 3.17 Consideration has been given to the site context with regard to quantum and density of development. This ensures an appropriate balance between optimising the potential of the site and making a distinct and high-quality place.

### **Scale and Massing**

- 3.18 The buildings have been designed to respond to its wider and future context including the Exmouth Junction site and existing residential properties which sit set back from Prince Charles Road, the closest properties being 34.5m from the Proposed Development.
- 3.19 The massing of the building has been articulated to respond positively to its immediate surrounding context. The apartment block has been setback from the adjacent allotments at 3 storeys, it then rises to 5 storeys on the corner of the Morrisons roundabout. This in turn ensures it is set back from the allotments so as not to appear overly dominant/cause any amenity or overshadowing issues. The proposed massing also allows greater legibility into the main Exmouth Junction site.

### **Layout**

- 3.20 The apartment block is an L shaped Building. It accommodates most of the vacant plot of land but is set back from its edges. The entrance to the building is located on a facade that faces away from vehicle-heavy routes to the north and east.
- 3.21 Upon entering the building useable internal and external communal space is provided for the residents in the form of a reception, seating and a lounge space. The core that leads to all other floors is located just past the communal space, before a corridor leads to all other units located on the ground floor. The allocation of communal amenity for the residents on the ground floor allows for the potential space to extend onto the external amenity space.
- 3.22 The stepping back of the massing provides external residential amenity terraces. The plant / ancillary space is easily accessible on the ground floor to minimise complications for servicing. Servicing arrangements are set out in the DAS.
- 3.23 Furthermore, the location of the setback building entrance area ensures it is easily accessible and benefits from natural surveillance from the development's reception area and amenity lounge space.



- 3.24 The scheme is car free - no allocated residential parking is provided. There are 5 car club spaces provided for residents. As such, the development will not appear overly dominated by hard infrastructure associated with the residential use, particularly car parking.
- 3.25 Each residential unit has been designed to the appropriate national residential space standards which ensures each unit has a sufficient amount of internal and amenity space. All units have access to some form of amenity space. Communal resident's lounge and amenity space is located on the ground floor and all units are provided with a balcony or access to a roof terrace. At ground floor level the units have a small private garden.
- 3.26 All residents will also be able to access the adjacent main Exmouth Junction development scheme which will have extensive public amenity areas, including a Village Green and children's play space.
- 3.27 Units within the apartment block will be accessible via lifts at ground floor level, and 5no. apartments will be adaptable for wheelchair users.

#### **Associated Infrastructure**

- 3.28 The Proposed Development will provide 5no. car parking spaces, which are designated car club spaces. No allocated residents parking is proposed. Cycle parking is proposed as part of the development. Secure, covered cycle parking is provided for residents with one space per apartment. In addition, there will be visitor cycle parking located close to the main building entrance. It is noted that there is an electric co-bike scheme proposed for the adjacent development which will provide a further option to promote cycling.
- 3.29 One internal covered waste storage area is included within the building and will provide for recycling, food and general waste.
- 3.30 Photovoltaic solar panels are indicatively shown at roof level on the block of flats, and these will provide clean, sustainable energy to occupants of the resulting development.



#### **4 PLANNING POLICY**

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan for Exeter City Council currently comprises:
- Saved policies from the Exeter Local Plan First Review 2005; and
  - Exeter Core Strategy 2012
- 4.3 The National Planning Policy Framework (NPPF) was published in February 2019.
- 4.4 At the heart of the NPPF is a presumption in favour of sustainable development, which runs through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay, and where the development plan is silent, grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise. The NPPF sets out that this includes Local Planning Authorities not having a demonstrable 5-year housing land supply.
- 4.5 The NPPF further advocates making effective use of land and encourages the re-use of brownfield land. Land should be used efficiently, and low densities should be avoided. LPAs should also work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of an area and seek to approve applications for sustainable development where possible.
- 4.6 The NPPF is a material consideration when making a determination under the Planning Acts.
- 4.7 Also of note, in May 2020 Exeter City Council announced that progress on its Local Development Scheme has been delayed due to the Covid-19 Pandemic. This means a postponement to the timetable for the preparation of the Greater Exeter Strategic Plan (consultation on Site Options and Draft policies expected September 2020), Exeter Development Delivery Plan (consultation on Scoping and Issues expected



March 2021) and the Planning Obligations Supplementary Planning Document (consultation on a draft expected January 2021).

### **Site Designations**

- 4.8 The site is vacant land and is not identified in the Local Plan First Review (2005). The site is in Flood Zone 1. There are no statutory protected heritage assets on the site or within the immediate vicinity.
- 4.9 The following section includes an assessment of the proposals against the relevant planning policy and guidance.



## **5 KEY CONSIDERATIONS**

- 5.1 This section assesses the Proposed Development against key national, strategic and local planning policy and guidance relevant to the determination of the application. The proposals have been developed having regard to policy and guidance. This application should be determined in accordance with the Development Plan unless material considerations indicate otherwise (NPPF paragraph 11).
- 5.2 It should be noted that Exeter City Council cannot demonstrate a five year housing land. The absence of a five year housing land supply is an 'other material consideration' in the context of the assessment of the merits of this application and the absence of a 5 year land supply means that Exeter's Development Plan policies for the supply of housing should not be considered up-to-date.
- 5.3 The main considerations in respect of this application relate to the acceptability in principle of the development, housing mix and type (including affordable housing) design and amenity standards, highway/transportation matters, ecology/sustainability/drainage and other environmental considerations.

### **The Principle of the Development**

- 5.4 The site is unallocated within the adopted Exeter Local Plan First Review. It therefore falls within the NPPF 2019 definition of a windfall site as it is not specifically identified in the development plan.
- 5.5 The NPPF advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area (and are often built-out relatively quickly). LPAs should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 5.6 Within the Local Plan First Review and Core Strategy, there are many adopted policies which point towards the proposal being considered appropriate in principle.
- 5.7 Within the Local Plan First Review, Policy H1 states that infill land within urban areas is 'sequentially preferable' for housing development.



- 5.8 The application site is small, vacant, available infill land within the urban area and so fully accords with these policies.
- 5.9 As set out above, Exeter City Council currently does not have a demonstrable 5-year housing land supply. In the absence of a 5-year housing land supply, paragraph 11 of the NPPF is engaged which provides the 'tilted balance' in favour of granting planning permission given the relevant main policy is out of date.
- 5.10 Accordingly, planning permission should be granted unless there are adverse impacts which would significantly outweigh the benefits when assessed against the NPPF as a whole.
- 5.11 In light of the above factors, the general principle of developing the site for residential purposes should be considered acceptable as it is supported at the national, strategic and local levels of adopted planning policy. The Development will provide 51no. new residential units which will make a significant, positive contribution towards meeting strategic and local housing need, with housing delivery recognised as a key local priority.

### **Housing Mix and Type**

- 5.12 Policy CP5 of the adopted Core Strategy states that the supply of housing in Exeter should meet the needs of all members of the community and include a mix of housing informed by context, local housing need. As outlined in Section 3, the proposed development will be a 'build to rent' scheme, providing private rented accommodation.
- 5.13 It is projected that c. 1,000 additional people per annum will be living in Exeter city over the next 10 years. There has been a large increase in the number of private rented sector households living in Exeter over the last five years, which is reflected in the current socio-demographic profile of the city, and there is continuing demand for this type of residential accommodation. The BTR sector positively contributes by satisfying a gap in the middle of the market for those who want good quality rental accommodation at market or discounted rents.
- 5.14 A mix of units will be provided 1, 2, 3 bed units and an element of affordable housing (discounted market rent). The mix of units will appeal to a variety of renter



profiles including young professionals, attracted by the location and proximity to the City Centre and families due to the lack of availability of high quality private rented accommodation in the City. The proposal is therefore considered to comply with Policy CP5.

- 5.15 The NPPF states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent. Government Guidance (issued September 2018) on Build to Rent affordable housing states that 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity).
- 5.16 20% of the units will be offered as Discounted Market Rent. In line with the PPG on affordable housing. This is a policy compliant provision for a build to rent scheme in an area where there is no specific local policy dealing with this type of housing. This approach was endorsed by the LPA on the Exmouth Junction scheme.

### **Design**

- 5.17 New development within Exeter is expected to deliver high quality urban design. Within the Core Strategy, Objective 9 seeks to 'create and reinforce local distinctiveness and raise the quality of urban living through excellence in design'. Saved Policy DG1 of the Local Plan First Review 2005 is the key policy in respect of design. The policy requires developments to be compatible with the urban structure of the city, and that the density promotes the urban character of the city. It also requires promotion of 'local distinctiveness' and 'visual richness'.
- 5.18 The design of the Proposed Development is explained in detail within the Design and Access Statement, produced by Darling Associates Architects. Darling Associates were the scheme architects on the main Exmouth Junction site. In considering the design approach on that scheme officers, in the March 2020 committee report, advised that; *'the appearance of the buildings are locally distinctive and reference the character of Exeter and the industrial/railway heritage of the site'*
- 5.19 As set out in the DAS the architecture and design solution proposed on the 'Gateway' site seeks to tie in with the architectural language and approach taken on the Exmouth Junction site.



- 5.20 In light of the above, the proposed development will lead to a high-quality urban design at the site and will be a positive addition to the area offering a new landmark building in this urban setting.

### **Density and Amenity**

- 5.21 To accord with policy CP4 of the Exeter Core Strategy and Policy H1 of the Exeter Local Plan, residential development should achieve the highest appropriate density compatible with the protection of local amenities and the character and quality of the local environment. It is recognised that this is a dense development with the provision of 51 new homes. However, this is in line with the NPPF 2019, Core Strategy, and Local Plan policies, provided that there is no detriment to local amenity, the character and quality of the local environment and the safety of local roads.
- 5.22 Given the site's standalone context and setting the proposal will not create adverse amenity issues for existing neighbouring properties, given the closest neighbouring property sits 34.5 metres away or for future residents of the site. There are no heritage assets within the vicinity of the site.
- 5.23 Importantly, the scheme has been specifically designed to avoid any potential impact with the adjacent allotments. The western façade of the proposed building has been stepped away from the allotments to prevent any overshadowing. Detailed overshadowing analysis is presented in the Design and Access Statement.
- 5.24 The application is also accompanied by technical documents that demonstrate the proposal will not lead to adverse impacts regarding noise levels, lighting levels or highway flows. A Construction Management Plan, if required by planning condition, will further ensure there are no adverse impacts for neighbours during the construction period.
- 5.25 Taking the above into account, the scheme seeks to optimise the development potential of the site whilst also responding positively to the wider context. In the absence of any specific policy which defines density ranges, the density of the Proposed Development is further considered appropriate.



- 5.26 The proposed development complies with the overall objectives of Policies H1, DG1 and DG4 of the Local Plan First Review, and CP4 of the Core Strategy, as it is at the highest feasible density, and does not cause environmental, amenity, heritage or highways issues.

### **Open Space**

- 5.27 At 51 units the scheme is 1 unit over the threshold for saved Policy DG5 of the Local Plan First Review to apply. This policy requires that at least 10% of the gross development area within a proposal should be provided as 'usable open space'.
- 5.28 Exeter Local Plan Policy DG4 directly addresses the need to provide defensible and private space, and the need for residents to feel at ease within communal spaces, when increasing development density.
- 5.29 Whilst the proposed development does not strictly comply with Policy DG5 it does provide good quality amenity space for all residents. There is useable shared external open space outside of the resident's lounge area. All units either contain balconies, access to a roof terrace or small ground floor outdoor space all which provide a usable quantum of private outdoor space.
- 5.30 The site is evidently within the sphere of influence of the adjacent Exmouth Junction development which includes 6,835 sq. m of 'public usable open space' comprising a main 'village green', and other open space areas and children's play facilities. Once developed residents from the Gateway site will be able to use the public open space on the neighbouring scheme.
- 5.31 In addition the site is 5 minutes walk away from Mincinglake Valley Park.
- 5.32 This is an urban infill proposal on available vacant land. Moreover, it is acknowledged that sites such as the application proposal are fundamental to the City in terms of delivering its housing targets.
- 5.33 Notwithstanding the weighty material considerations in favour of the scheme and the provision of adequate usable space, the applicant is willing to consider offering a financial contribution towards off site open space/play space in the local area



should officers consider that this is necessary to compensate for an under provision on the site.

### **Inclusive Design and Access**

- 5.34 The development has been designed to ensure full accessibility and inclusion so that all potential users, regardless of disability, age or gender can access the development safely and easily. The design and layout of the building, access and entrance enables everybody to enter, use the facilities and leave safely, independently and with ease.
- 5.35 Exeter Local Plan Policy H7 requires 5% of dwellings to be designed to be wheelchair accessible (in accordance with Part M4(3) of Building Regulations 2015) All units are designed to M4(2) accessible standards. 5% (as per councils' policy) of units will be designed for M4(3) Wheelchair users and the remainder are designed to the accessible and adaptable standard (under Part M4(2) of Building Regulations 2015).
- 5.36 Full details of the measures incorporated to ensure inclusive design and access is provided in the DAS.

### **Transport and Parking**

- 5.37 Within the Local Plan First Review, Strategic Policy AP1 seeks to promote new developments into sustainable locations, in order to reduce the requirement to travel, especially by car. This principle is then confirmed in Policy T1. Similarly, within the adopted Core Strategy, Policies T2 and T3 promote the siting of new residential developments in locations close to existing amenities, and they should help maximise sustainable transport modes.
- 5.38 As set out within the Transport Statement produced by Vectos, the application site is located in a highly sustainable location and therefore is ideally placed to be able to positively promote and encourage trips by walking, cycling or public transport, rather than being reliant on the private car. There are several bus and train services within easy reach, its proximity to Exeter City Centre and local facilities such as schools, health centres, shops and community facilities.



- 5.39 Given the accessible location of the site, a very high number of secure cycle parking facilities (100) will be provided in order to actively promote cycling as a feasible mode of transport.
- 5.40 The highly sustainable location of the site allows for a car free scheme to be proposed. Prospective residents will be aware, prior to considering whether to rent an apartment, that there are no residents parking spaces available and that there are wider parking restrictions in place in the surrounding area. Notwithstanding this, it is recognised that there may be a small number of residents who may prefer to have access to a car for certain journey purposes. In response to this, in the south west corner of the site, it is proposed to create space for a car club. Dedicated space is to be provided for up to two vehicles which will be made available to members for flexible periods of time (i.e. as little as an hour up to 2-3 days). These spaces will also be equipped with infrastructure to permit the future conversion to accommodate electric charging points.
- 5.41 This restriction on cars will actively encourage people to walk, cycle and use public transport. This also fits with the objectives of the emerging Exeter Transport Strategy. One of its main objectives is to ensure 50% of trips within the city will be made on foot or by bike. The proposal will help to meet this target.
- 5.42 In light of the above, the proposal will not create any significant traffic issues, and will not lead to 'severe impacts' on the local highway network. The Transport Statement also concludes that the principles of a car-free development are to be promoted here due to the sites highly sustainable location. It has been demonstrated that the proposed development in accordance with NPPF guidelines and it is concluded that the development is acceptable from a transport perspective.

### **Ecology**

- 5.43 An Ecological Impact Assessment (undertaken by Burton Reid) is submitted with the application. An ecological assessment of the site was carried out in order to highlight any potential ecological constraints/opportunities associated with the proposals and to help inform the design of the development. A desk-based study and Preliminary Ecological Appraisal (PEA) followed by specialist surveys for reptiles



to assess the site and whether there are any ecological receptors that may constrain the site's development.

5.44 The ecological assessment concludes that the proposed development will have no impacts upon statutory or non-statutory designated sites and that the site is not home to any protected or priority habitats. The site does support a "medium" population of Slow-worm and a "low" population of Common Lizards. Ecological mitigation is proposed, the applicant will:

- Produce a CEcMP document to cover ecological mitigation / avoidance measures during construction.
- Produce a LEMP document to cover long-term management of biodiversity features.
- Undertake a reptile translocation exercise to move reptiles prior to start of works.
- Ensure sensitively designed and directional lighting, with a particular emphasis on avoiding light spill into the adjacent allotments is proposed.
- Provide ecological enhancements including 1) invertebrate friendly and native species planting 2) provide bat and bird nesting boxes.

5.45 Policy LS4 of the Core Strategy states that any proposal which would harm the environment will only be permitted if the need for the development outweighs any impacts, and appropriate mitigation is identified. The National Planning Policy Framework (NPPF) states that planning decisions "*...should contribute to and enhance the natural and local environment protecting and enhancing valued landscapes...and minimising impacts on biodiversity and providing net gains in biodiversity*". It also encourages developers to incorporate net gains for biodiversity into projects, such as through the implementation of ecological enhancements.

### **Sustainability**

5.46 Policies CP13 – CP15 of the Core Strategy promote the use of decentralised energy networks, renewable and low carbon energy sources, and sustainable design and construction methods.



- 5.47 The application is supported by an Energy Strategy, produced by Syntegra, which concludes as follows:
- A connection to a district heating network would not be feasible given the distance of the site from the nearest one.
  - The proposed residential units have been designed so that part of the roof space can accommodate photo voltaic (PV) panels.
  - A 21.08 % carbon reduction has been achieved via promoting PV panels on the site.
  - An overall 21.49% carbon reduction has been achieved via energy efficient measures and PV panels on the site.
- 5.48 The site's location is also highly sustainable which will help promote use of greener travel modes. Additionally, the car free nature of the scheme will help to encourage people to walk, cycle and use public transport.
- 5.49 In light of the above, the proposal will lead to a development which has low carbon emissions, utilises renewable and low-carbon energy sources, and encourages sustainable travel patterns.

## **Environmental Considerations**

### Noise

- 5.50 This application is accompanied by a Noise Impact Assessment which details the results of a noise survey undertaken and pre-application discussions with the LPA. The assessment has considered the advice of local and national planning policy and best practice guidance.
- 5.51 The site is within a medium risk area in terms of noise during both the daytime and at night.
- 5.52 The assessment provides acoustic performance recommendations targeted at the north, north-east, east and south-east façades (those facing Prince Charles Road)



of the apartment block to ensure that acceptable internal noise criteria can be achieved.

- 5.53 Through careful consideration of the building envelope construction and proposed acoustic performance mitigation, the proposed development should avoid future residents being exposed to harmful levels of noise. The report concludes that significant adverse impacts on the health or quality of life of future residents will be avoided, in line with the aims of the NPPF, NPSE and PPG-Noise. There are no reasons that this development proposals should be refused on the noise grounds.

#### Air Quality

- 5.54 Core Strategy Policy CP11 (Pollution) advises that development should be located and designed so as to minimise and if necessary, mitigate against environmental impacts. Within Air Quality Management Areas measures to reduce pollution and meet air quality objectives should be brought forward. The development site is not located within an AQMA. It is located approximately 720m east of the nearest AQMA.
- 5.55 Local Plan Policy EN3 (Air and Water Quality) advises that development that would harm air or water quality will not be permitted unless mitigation measures are possible and are incorporated as part of the proposal.
- 5.56 The Air Quality Assessment which accompanies this application concludes that in relation to the construction phase of the project there will be no significant impacts from emissions, assuming good practice dust control measures are implemented.
- 5.57 Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. However, due to the low number of trips anticipated to be produced by the proposals, negligible impacts are predicted.
- 5.58 Based on the assessment results, air quality issues are not considered a constraint for the development. As such the Proposed Development will accord with Core Strategy Policy CP11 and Local Plan Policy EN3.



### Lighting

- 5.59 The Residential Design SPD references that in respect of proposed developments, "Lighting to be efficient and attractive" (Safety), "Wildlife friendly" (Protect and enhance biodiversity), "Ensure key pedestrian and cycle routes are well lit using light sources with good colour rendering" and "Lighting columns and fittings to be vandal resistant" (Public realm design) The NPPF seeks to restrict the impact of light pollution on local amenity.
- 5.60 A lighting strategy will be developed at the detailed design stage of the project, the details of which can be requested through the submission of further information at the planning condition stage. The accompanying DAS includes a high level Lighting Assessment which sets out details and specifications of potential proposed lighting.
- 5.61 The design approach to lighting here is to minimise its adverse effects on the amenities of existing and proposed residential properties. Moreover, external lighting will be sensitively designed and directional, with a particular emphasis on avoiding light spill into the adjacent allotments.

### Land Contamination and Hazards

- 5.62 The NPPF recognises planning decisions should give substantial weight towards reusing suitable previously developed (brownfield) land and where this supports appropriate opportunities to remediate contaminated land (paragraph 118). The NPPF continues that decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from potential contamination (paragraph 178).
- 5.63 Local Plan Policy EN2 requires development on land which is potentially contaminated to undertake surveys to identify the nature and extent of contamination and recommend remediation to render the site fit its future development and use.
- 5.64 The Application is accompanied by a Geo – Environmental Assessment to consider potential land contamination impacts associated with the proposed development. The report identifies that there are limited number of on-site and off-site potential sources of contamination that would require further investigation.



- 5.65 Nonetheless, the accompanying report sets out a strategy for future site investigation to ensure some environmental sampling and analysis is undertaken. It also recommends a ground investigation to enable preliminary foundation and pavement / highways design.
- 5.66 As such, it is considered that the potential risks of contaminated land have been effectively considered and appropriate mitigation measures are proposed in accordance with national, strategic and local planning policy requirements.

#### Drainage Strategy

- 5.67 This Application is accompanied by a Drainage Strategy. It identifies the current drainage characteristics of the site, including nearby public sewer and watercourses, tributaries or other significant water bodies, determines the best method of conveying surface water from the development and considers Sustainable Drainage Systems (SuDS) as an option for reducing surface water flood risk (where appropriate). The Applicant has contacted the service providers and Devon County Council to assist inform the strategy.
- 5.68 The site is located in Flood Zone 1 and assessed as having a less than 1 in 1,000 annual probability of river or sea flooding) and is less than 1 hectare in size. Therefore, a site-specific flood risk assessment is not required.
- 5.69 Through engagement and consultation with representatives of the adjacent allotment holders it is understood that there have been some flooding issues associated with the existing allotments. Although off-site flood issues do not need to be dealt with by the onsite drainage, the presence of a new onsite drainage system will ensure no surface water runoff will leave the development boundary and potentially contribute to the flooding issues at the allotments.



## **6 DRAFT S106 HEADS OF TERMS & ECONOMIC BENEFITS**

6.1 The Applicant wishes to discuss the proposed Heads of Terms with the Council. It is understood that the following affordable housing and financial contributions may be requested:

- 10no affordable units (equating to 20% of 51 units). DMR at 20% less than private market rent.
- Highways contribution towards Stoke Hill Roundabout improvements.
- CIL liability on 41 no. BTR units (CIL liability will not apply to the DMR units)

6.2 The Applicant is willing to agree to planning obligations which meet the requirements of 122 and 123 of the CIL Regulations 2010. Regulation 122(2) requires planning obligations to be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

6.3 Should contributions be requested that are unrelated or at a scale that is unreasonable, rendering the scheme unviable, the applicant reserves the right to submit a financial viability assessment prior to determination of the application.

### **Economic Benefits**

6.4 The proposed development will lead to a series of significant positive economic impacts. A summary of these is set out below:

- The proposed development will create a need for new short term construction jobs, and the additional residents will bring retained spend to the area which will support 2 full time retail roles in the Exeter area;
- The construction is expected to take place over a 18 month period, and will lead to 113 direct construction roles per annum during the build phase.
- Additionally, the new residents in the scheme will be employed in the local area. 61 economically active and employed residents are estimated to live within the new development;



- The increase in residents will have a direct positive impact upon the local economy in the form of increased spending. The total annual spend is estimated to be approximately £1.6m. A proportion of this additional spending will be spent in local businesses surrounding the application site and the nearby City Centre, which will be of benefit to the viability of businesses and the area. This will then have subsequent benefits in terms of securing jobs in the wider area and ensuring the City Centre remains a viable destination;
- The proposal will also lead to a significant boost in income for the Council through council tax payments. We estimate that the proposed 51 residential units will generate a total of £97,400 per annum estimated annual increase in Council Tax revenue.



## **7 CONCLUSIONS**

- 7.2 The Proposed Development represents a well-designed, efficient and sustainable, high quality, residential development. The proposal has been fully assessed against national, strategic and local planning policy and has been found to comply with the policies set out in these documents.
- 7.3 The principle of the development accords with current planning policy and guidance. National policy, Exeter Core Strategy, and the saved policies of the Exeter Local Plan First review all seek to ensure that development achieves the highest possible intensity of use compatible with the local context to deliver a scale of development which makes the most effective and efficient use of land.
- 7.4 The proposal represents an important opportunity to deliver a sustainable, residential development on vacant unallocated land in an urban location. The proposed residential units will provide a much-needed contribution towards local housing need. The NPPF advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.
- 7.5 The proposed development is a vacant windfall site within an existing residential area with a range of local services close by and good public transport links. The principle of residential accommodation in this location is supported by local and national policy.
- 7.6 To accord with policy national and local policy residential development should achieve the highest appropriate density compatible with the protection of local amenities and the character and quality of the local environment. It is recognised that this is a dense development with the provision of 51 new homes. However, there is no detriment to local amenity, the character and quality of the local environment and the safety of local roads.
- 7.7 The new apartment block would provide a mix of 1, 2 and 3 bedroom units with 5% being designed to be adaptable for wheelchair users. The mix of units will appeal to a variety of renter profiles including young professionals, attracted by the location and proximity to the City Centre and families. There is a lack of availability of high quality private rented accommodation in the City. The units all exceed the



minimum internal housing space standards and have private balconies or access to ground floor amenity space/roof terraces.

- 7.8 It is considered that the development is of an appropriate scale and form given that it is a Gateway building into the main Exmouth Junction site, the context that the site is situated within, and how the massing relates to surrounding context, delivering several important urban design and regeneration benefits. The apartment block will optimise the use of the site whilst also responding positively to the current and emerging streetscene of Prince Charles Road and plans for the new Exmouth Junction development. The high-quality design of the proposed buildings is in accordance with design policies at all levels.
- 7.9 The Proposed Development will also deliver 20% affordable accommodation (discounted market rent), in accordance with adopted national policy (in the absence of a local policy being in place relating to build to rent schemes).
- 7.10 The Council cannot demonstrate a five year housing land supply and is significantly short of being able to do so. This is important when weighing up the planning balance in reaching a decision on applications for residential development.
- 7.11 It has been demonstrated that the Proposed Development accords with the prevailing planning policy framework and represents an appropriate, high quality, sustainable development that is encouraged by such policies; it is therefore concluded that the Proposed Development should be granted planning permission. For the reasons outlined in this Statement, we invite the Council to support the application.



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