

From: Lorna Henderson

Sent: Wednesday, September 24, 2025 15:02

To: Howard Smith

Subject: RE: Town and Country Planning Act 1990 - Redevelopment of Mary Arches Multi Storey and Surface Level Car Parks. Planning Ref: 25/0781/FUL

Dear Howard,

Further to the submission of revised drawings on Friday 19th September, we have undertaken a thorough audit of all supporting material by relevant consultants. Please see below and attached responses from the specialist team.

### **HTVIA – Heritage and Townscape**

Our retained heritage and townscape specialists (GJHP and Neaves Urbanism) have provided the following comments on the revisions:

*'The proposed amendments to the application scheme are in the spirit of the original design and have been made following discussions with Exeter CC Officers. They do not affect the outcome of the heritage, townscape character, and visual assessment in the HTVIA and the concluding positive effects remain.*

*In all cases where visible the Proposed Development will enhance the setting of nearby listed buildings and the St David's Conservation Area. The Proposed Development will better reveal the significance of the Central Conservation Area and enhance the setting of nearby listed buildings and the St David's Conservation Area. The effects on the wider area will be limited. There will be no harmful effect on the setting of any heritage asset in the surrounding area.*

*The Proposed Development will continue to result in a beneficial effect on townscape character through continuing to reinstate the existing urban block, which now follows the North Street building line, and retaining existing links through the site through the refined passageway. The façades continue to respond to features and materials used within the conservation area surrounding area and have a clear hierarchy of base, middle and top.*

*The amendments to the façade and roof treatment of the application scheme's two blocks will be experienced within the long-range, mid-range and immediate townscape views. The roof treatment of the block on Mary Arches Street has been refined to provide a continuous mansard roof, responding to the roof treatment of the existing student accommodation building on the junction of Mary Arches Street and Bartholomew Street. Both the Mary Arches Street block and the block addressing*

*North Street and Bartholomew Street have an increased set back and articulation at roof level that continues to provide visual interest. The treatment of the corner element of the North Street and Bartholomew Street block creates a slimmer feature within the mid-range and immediate views and is positively articulated further with scalloped panels and Juliet balconies. At the ground floor of this corner element the new display area provides an active frontage to the junction, which would have a beneficial effect on immediate townscape views.'*

## **Ecology & BNG**

Please find attached the updated BNG metric and report. You will note that there has been an enhancement of BNG on site, as a result of the revisions made.

Also attached is a revised EclA. This has been revised to address 'lighting' during construction and operational phases. You will note that resultant lighting during these phases can achieve 'no worse than existing baseline lighting levels related to existing off-site streetlighting'. We would be happy to accept a suitably worded condition securing lighting details, should you think this is necessary.

## **Highways**

Our retained transport specialist (Apex) has provided the following comments on the revisions:

*'When considering the scheme and design alterations, a summary of the key transport-related elements are set out as follows.'*

*The revised development proposals reduce the scheme from 309 to 297 units. When considering vehicle and multi-modal trip generation, the methodology and analysis set out within the Transport Statement (TS) were based on a total of 309 units. The resultant vehicle and multi-modal trip generation was agreed with Devon County Council (DCC) in their role as the Local Highway Authority (LHA). As such, the analysis undertaken to date represents a robust position as the revised scheme with lower units will generate fewer trips. The revised scheme would not alter the existing conclusions, whereby the proposed development would not have a severe impact on the operation of the highway network, in accordance with the NPPF paragraph 116.*

*There are no changes to the layby arrangement dimensions on Bartholomew Street East, which were presented within the TS accompanying the planning submission. This arrangement was supported and agreed with by the LHA. The TS set out that an area of shared space/public realm only accessible by retractable bollards was previously proposed from Synagogue Place. This was to enhance and assist with existing unloading/loading for the adjacent Synagogue's operations. The revised*

*scheme proposals provide two disabled bays in this location, which is acceptable given the low-level of vehicle movements generated by these spaces.*

*The level of the cycle parking has reduced from 316 spaces to 170 spaces. The level of provision is in agreement with Exeter City Council (ECC) and aligns with Table 2 of ECC 'Sustainable Transport Supplementary Planning Document' guidance for 'HMOs, bedsits, cluster flats, student accommodation'. The minimum requirement for this use type is 'for the first 10 bedrooms, one space per bedroom and from the 11th bedroom onward 1 space per 2 bedrooms', which, based on the reduced 297 units, would equate to a minimum of 154 cycle parking spaces.*

*The revised proposals provide a total of 170 cycle spaces, which are provided internally and in a double-stacked arrangement, similar to the existing proposals. This level of provision exceeds the minimum requirements requested by ECC. As such, the revised level of cycle parking provision is appropriate and in line with all relevant guidance and policy.*

*Overall, the revised proposals represent non-material alterations to the scheme from a transport perspective; as such, the conclusions set out within the Transport Statement remain valid and appropriate in support of the revised development. The LHA's response dated 4th August 2025 raises no objection to the proposals, and we would expect this recommendation to be maintained.'*

### **Energy/Sustainability**

Our retained sustainability consultant (ESD) has provided the following comments on the revisions:

*'There are no changes to the carbon reduction figures as a result of the revised number of units.'*

### **Daylight/Sunlight**

Our retained daylight/sunlight specialists (BLDA) have provided the following comments on the revisions.

#### ***'Proposed Ground Floor Plan***

*There would likely be no material change in daylight to the rooms tested, although a further two additional lounges have now been added. The depths of the additional proposed lounges and provision of windows shown at the additional proposed lounges are consistent with the lounges previously tested, which met the BRE criteria for daylight.*

### **Proposed First, Second, Third, Fourth Floor Plans**

*There would likely be no material changes to the daylight levels to the key rooms tested as set out in the report dated 12th June 2025.*

### **Proposed Fifth Floor Plan**

*The floor layouts have been revised to the rooms which would face Bartholomew Street East and Mary Arches Street, due to the change in roof shape. The windows to these rooms would receive more daylight than at the lower floor levels, located approximately 15.5 metres higher than ground level. Most of the large units would benefit from having more than one window. On this basis, we would expect the proportion of rooms meeting the BRE criteria for daylight to at least be consistent with the units in the lower floor levels of the proposed scheme.*

### **Conclusion**

*Based on our review of the revised drawings and on the reasoning set out above, we can conclude the proportion of rooms that would meet the BRE criteria for daylight and sunlight would be consistent with the results set out in the report dated 12th June 2025.'*

### **Other Reports**

Self evidently the proposed revisions have no effect on Noise, Air Quality, Geo Technical and Archaeological Assessments as well as the Waste Audit Strategy.

In addition to the above, we augment the submission with a formal response to DCC's Tree Services observations, prepared by Parkhood Landscape Consultants and Darling Associates (see attached).

Finally, I set out below a response from our drainage specialist (Rodgers Leask) to Devon LLFA comments on the drainage strategy.

	<b>LLFA Comment</b>	<b>Response</b>
1	The applicant mentioned that the existing brownfield discharge rate, $Q_{bar}$ is 3.4l/s and the equivalent greenfield runoff rate, $Q_{bar}$ is 1.0l/s. It is, however unclear how they derived	$Q_{bar}$ values were calculated using the hydrological region of 8, the latest FEH data at the time, and based on the site area of 0.5ha. The brownfield rate was calculated in

	<p>these figures as no calculations were submitted to support this. The applicant shall submit the calculations for consideration and assist in deciding as to whether the proposed 2.0l/s (for each Catchment 1 and 2) is acceptable.</p>	<p>Causeway Flow via the use of the pre-development discharge tool which utilises the IH124 greenfield method to calculate the brownfield runoff rate. Similarly, the IH124 greenfield method was used for the greenfield runoff rate.</p> <p>2.0l/s is proposed because there is a risk of blockage of an orifice flow control with flows any less than this. Low flow rates can allow solid particles or debris to accumulate and cause a restriction or complete obstruction.</p>
2	<p>The drainage is proposed to be offered to South West Water (SWW) for adoption. However, the applicant have yet approached SWW to identify as to whether the current drainage proposal to tap into their system is acceptable to them. The applicant shall at this stage get an agreement in principle from SWW.</p>	<p>SWW have now responded to a point of connection enquiry that accords with the proposed drainage strategy.</p>
3	<p>The Cv value shall be changed to 1.0 from the submitted model output results (File Name: Attenuation Requirement Network – Storm Network, dated 29th May 2025).</p>	<p>The requirement for a Cv value of 1 is noted and will be applied to the model at detailed design stage.</p>

You will note from the information provided above and attachments that the proposed revisions to the scheme have been fully tested by all relevant consultants. As such, we trust that the re-consultation process can continue as previously discussed and agreed.

The applicant looks forward to a timely referral to Planning Committee, targeted to be 11th November.

Regards,

LORNA HENDERSON  
DIRECTOR