

14 September 2023

**Delivered by email**

Mr Howard Smith  
Planning Services  
Exeter City Council  
Civic Centre  
Paris Street  
Exeter  
EX1 1JN

MCLA3001

Dear Mr Smith

## **LAND AT SUMMERLAND STREET, EXETER – FULL PLANNING APPLICATION (REF. 23/0490/FUL)**

Further to our ongoing discussions in respect of the above application for Planning Permission, we are pleased to enclose a comprehensive pack of revised drawings and documents. This amended scheme, as shown within these revised drawings and documents, addresses comments made following the original submission by both the Local Planning Authority, statutory consultees and other interested parties.

### **Summary of Scheme Changes**

In summary the following main changes have been made to the application proposals. For full details reference should be made to the relevant drawings and documents which accompany this submission:

- (i) Reduction of building height by 1 storey (6 storeys in total from 7 storeys);
- (ii) Reduction in quantum of proposed development to 147 bed spaces (from 167);
- (iii) Revised ground floor entrance design to improve visibility and relationship with streetscene;
- (iv) Roof terrace and other internal roof design developed and further landscape design details provided (including features to enhance biodiversity value);
- (v) Gable end elevations developed with additional features to provide relief and interest;
- (vi) Ground floor landscape proposals to front of building developed, as part of proposal for adjoining areas on Summerland Street;
- (vii) Elevations developed to improve appearance of scale at ground floor;
- (viii) Revised ground floor layout to address comments around amenity provision (to create distinctive zones as part of providing functional and flexible spaces, as well improving circulation and legibility) and change to distribution of other shared internal amenity spaces within building – amenity spaces are now focused on the ground floor and first floor adjacent to the roof terrace following dialogue with Co-Living operator and functional feedback from live schemes;

### **Description of Development**

The following revised description of development should be used:

40 Queen Square  
Bristol  
BS1 4QP

T 0117 989 7000 [turley.co.uk](https://www.turley.co.uk)

*“Demolition of existing buildings and the erection of a 147 bed-space co-living development (up to 6 storeys in height) and associated works”*

## **Application Documents**

The table which is included at **Appendix 1** sets out the full pack of revised and additional drawings and documents which now accompany the application. Where no change has been made or a document/drawing is not omitted then this is noted.

## **Layout and Design**

As set out within the summary of scheme changes above, a variety of layout and design changes have been made in response to comments made following the original submission. The changes made are detailed in the submitted drawings and DAS Addendum.

Alongside the reduction in total height and quantum, there has been a proportionate modification to the total internal communal amenity space provided, the distribution of this space within the building and the detailed layout and design. The revised approach reflects detailed input from the operators of other existing Co-Living developments to ensure that the spaces to be provided are successful a best reflect the requirements of residents and effective management of the building (to remain high standards). The revised scheme includes for internal shared amenity space at a level of 4.3sqm per bed space, together with external amenity space as part of the high quality roof terrace (which is adjacent to the fifth floor kitchen).

The revised ground floor layout is organised around promoting active and busier uses at the front (creating active frontages), rooms nearer to the street have larger windows. Quieter, smaller spaces are now located in the centre of the plan between the active frontages and plant and other functional spaces which are to the rear.

## **Heritage and Views Assessment**

Concerns expressed by Officers and other stakeholders about the height and scale of the proposed building have been considered and a material reduction in the height and scale of the proposed building made. Updated Actual Visual Representations [“AVRs”] have been prepared together with additional ‘wireline’ modelled images, from key viewpoints, which show the impact of the reduction in building height from these agreed viewpoints. The change arising from the reduction in height and massing is also show throughout the DAS Addendum.

The assessment of the amended scheme continues to demonstrate that the proposed development has adopted a sensitive approach to the significance (and setting and shared views) of nearby heritage assets; concluding again that no adverse impacts to their significance will arise as a result of proposed demolition and the introduction of the new use and built form. The scheme would in fact enhance the setting of the St Sidwell’s Conservation Area by introducing a beneficial new use and vitality to the local townscape, creating new visual interest through further refinement of its quality architecture/public realm and contextual consideration, and also better defining the transition between this historic area and the emerging new residential character to the south/east.

The proposed reduction in the height of new built form on Site would also reduce visual effects within the local and wider townscape setting of the nearby Sidwell Street Methodist Church (Grade II\* Listed Building). The local landmark status of this historic building would not be challenged or otherwise detracted from by the proposed development, and in particular the visual presence of its distinctive cupola as a wayfinding feature would be maintained within this area. Overall, the heritage significance of this listed building would be sustained.

## **Ecology**

An updated Bat and Bird Survey Report has been provided to accompany the application which includes additional details of proposed enhancement measures in the form of additional bat and bird boxes to be installed in appropriate locations on the building. The final details of these enhancement features can be secured by appropriate planning conditions. No additional survey has been undertaken as the information provided gives a

robust assessment of the potential presence of protected species (or their habitats) within the application site, and establish there to be “low” potential for the existing site to support roosting bats (as summarised below). The survey has been undertaken by a qualified and licensed surveyor with over 20 years relevant experience. It remains the case that the submitted Survey Report recommends that (based on adopting a precautionary approach) various measures are put in place to ensure no harm or disturbance to protected species.

*Building 1 and 2 were considered to provide low potential to support roosting bats following external and internal inspection. The dusk emergence survey did not provide any evidence of bats roosting within any of the buildings within the complex that comprises the Site, such roosting bats are considered likely to be absent from the Site. Bat activity during the survey was minimal, with only one bat heard during the survey. As such, when considered alongside the low roosting potential of buildings within the Site, the urban location, surrounding street lighting and lack of nearby green/blue foraging corridors, the Site is considered very unlikely to support roosting bats in the future (assuming that Site usage and conditions remain unchanged).*

## **Energy and Sustainable Construction**

Updated sustainability and energy documents have been provided to reflect the revised scheme design. It remains the case that the proposed development is being designed to achieve an “Excellent” accreditation under the BREEAM scheme.

In addition to achieving a BREEAM Excellent rating, the following key sustainability performance measures will be achieved:

- An 11% improvement over the Part L 2021 Target Emission Rate, meeting requirements of local policy CP14;
- Potential for connection to any district heating system that may be available in the future is designed into the scheme, and can be secured using obligations or conditions, satisfying the requirement of local policy CP13;
- On site renewable generation is to be provided, via a combination of air-source heat pumps and photovoltaics, and provides for 22.5% of the total energy demand.

## **Access and Movement**

As detailed within the revised application documents additional external works around the site have been proposed to enable landscaping at ground level around the building (within Summerland Street), as well as improved connections for pedestrians to and around the site frontage – comprised of enhanced level crossings of Red Lion Lane and Verney Street.

As has been discussed with the City Council and the County Council (as Local Highway Authority) a financial contribution towards potential future improvements to sustainable transport connections and the public realm on Summerland Street could be provided, should any contribution be found to be necessary so meet the tests set out in legislation and policy.

The revised internal ground floor layout has included additional space for adapted cycle storage, which benefits from level access from within the main entrance and reception area – this area will also offer facilities for cycle repair and maintenance tasks, for use of all residents.

## **Flood Risk and Drainage**

In response to comments submitted by the LLFA (Devon County Council) the revised Flood Risk Assessment confirms the proposed location of the surface water connection into the existing South West Water network.

## Noise

An addendum to the submitted Noise Impact Assessment has been provided addressing comments previously raised by the Council's Environmental Health Officer. The Noise Impact Assessment Addendum confirms that:

- The survey undertaken at the site was done at 1<sup>st</sup> floor level and is representative of the 1<sup>st</sup> floor of the proposed building, with the survey undertaken identifying that music was not the dominant noise source, and that there is no indication that noise levels due to breakout from the roof would be excessive;
- The submitted impact assessment includes frequency data for the noise levels used in ingress calculations, with the assessment covering the octave band range of 125Hz to 2kHz. The highest internal octave band noise levels are not predicted to be 125Hz and therefore low frequency noise levels are not considered to be sufficiently high that they require a separate and alternative assessment method;
- Rooms are designed with alternative ventilation to ensure suitable internal conditions when the windows are closed. Part O of the Building Regulations apply to the proposed development (in terms of noise and overheating requirements);
- Any potential noise from the proposed roof terrace would be managed as part of the overall management of the building, as detailed in the updated Management Plan submitted with the application. Section 2.3.5 of the submitted Management Plan now states that:

*The roof terrace will be open from 7am until 10pm daily for residents use only. The terrace entrance doors will be provided with access control which will be time limited to the above times. Should there be incremental weather such as snow / ice the site lead will close the roof terrace as required for the relevant length of time.*

*At 9.30pm on-site staff will go up to the roof terrace and remind residents the area is closing at 10pm. They will complete a full sweep of the terrace to ensure all residents have left at 10pm. The doors will then be closed, and access control fob readers will be set to not allow access until 7am in the morning (site staff will be able to access still using their fobs if required).*

- Precise plant details are not known at this design stage but proposed levels will be no greater than background levels in line with national planning policy – whilst an additional reduction may be proposed in due course to achieve BREEAM compliance (Credit Pol05) this is not essential for the acceptability of the proposed development;
- A construction environmental management plan (CEMP) can be secured by condition, as is usual practice.

## Planning Obligations and Conditions

A number of matters will need to be covered via planning obligations (secured under S106) and planning conditions. We look forward to working with Officers to confirm the final "Heads of Terms" required to support the proposed development and draft list of planning conditions.

## Summary

The revised scheme proposals now presented to the Council for consideration and approval have responded to comments raised following the original submission and have sought to address various concerns relating to height, mass and other aspects of design, raised by various parties. The development proposed will make a distinct

contribution to meeting housing needs within the City, by offering an innovative residential product which will ensure the efficient use of land in this central location and contribute to the creation of mixed and balanced communities within the City Centre.

The development will enhance the visual appearance of the site, this part of Summerland Street and the setting of nearby heritage assets. It remains the case that the proposed development accords with the Development Plan, the Framework and other material considerations - planning permission should therefore be granted without delay.

We trust that the information submitted is clear and helpful and will allow further consultation to be undertaken and the application to be promptly progressed to determination, so that the beneficial redevelopment of this important city centre site can be progressed. Should you have any queries then please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Ross', with a stylized flourish at the end.

Andrew Ross

**Director**

[andrew.ross@turley.co.uk](mailto:andrew.ross@turley.co.uk)

## Appendix 1 – Drawing and Document List

Original Application Submission			
Application Document	Author	Reference No.	September 2023 Update
Forms			
Application Form	Turley	PP-11958584	<b>NO CHANGE</b>
CIL Form	Turley (on behalf of applicant)	N/A	Rev B September 2023
Covering Letter	Turley (March 2023)	N/A	Revised Letter dated 14 <sup>th</sup> September 2023
Drawings / Plans			
Site Location Plan	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-00001 Rev. P19	<b>NO CHANGE</b>
Existing Site Plan	Berry Geomatic	-	<b>NO CHANGE</b>
Elevations 1 of 2	Berry Geomatics	-	<b>NO CHANGE</b>
Elevation 2 of 2	Berry Geomatics	-	<b>NO CHANGE</b>
Proposed Site Plan	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-00002 Rev. P19	154670-STL-ZZ-ZZ-DR-A-00002 Rev. P23
Proposed GEA Plans	Stride Treglown	154670-STL-XX-XX-DR-A-S7001 Rev. S2_P13	154670-STL-XX-XX-DR-A-S7001 Rev. S2_P24
Proposed GIA Plans	Stride Treglown	154670-STL-XX-XX-DR-A-S7000 Rev. S2_P18	154670-STL-XX-XX-DR-A-S7000 Rev. S2_P24
Proposed Ground Floor Plan	Stride Treglown	154670-STL-ZZ-00-DR-A-ZZ-10000 Rev. S2_P19	154670-STL-ZZ-00-DR-A-ZZ-10000 Rev. S2_P23
Proposed First Floor Plan	Stride Treglown	154670-STL-ZZ-01-DR-A-ZZ-10001 Rev. S2_P19	154670-STL-ZZ-01-DR-A-ZZ-10001 Rev. S2_P23
Proposed Second Floor Plan	Stride Treglown	154670-STL-ZZ-02-DR-A-ZZ-10002 Rev. S2_P19	154670-STL-ZZ-02-DR-A-ZZ-10002 Rev. S2_P23
Proposed Third Floor Plan	Stride Treglown	154670-STL-ZZ-03-DR-A-ZZ-10003 Rev. S2_P19	154670-STL-ZZ-03-DR-A-ZZ-10003 Rev. S2_P23
Proposed Fourth Floor Plan	Stride Treglown	154670-STL-ZZ-04-DR-A-ZZ-10004 Rev. S2_P19	154670-STL-ZZ-04-DR-A-ZZ-10004 Rev. S2_P23
Proposed Fifth Floor Plan	Stride Treglown	154670-STL-ZZ-05-DR-A-ZZ-10005 Rev. S2_P19	154670-STL-ZZ-05-DR-A-ZZ-10005 Rev. S2_P23
Proposed Sixth Floor Plan	Stride Treglown	154670-STL-ZZ-06-DR-A-ZZ-10006 Rev. S2_P19	<b>OMITTED</b>
Proposed Roof Plan	Stride Treglown	154670-STL-ZZ-07-DR-A-10007 Rev. P19	154670-STL-ZZ-07-DR-A-10007 Rev. P23
Proposed Verney Street and Red Lion Lane Elevation	Stride Treglown	154670-STL-ZZ-XX-DR-A-20001 Rev. P19	154670-STL-ZZ-XX-DR-A-20001 Rev. P23
Proposed Summerland Street and Rear Elevations	Stride Treglown	154670-STL-ZZ-XX-DR-A-20002 Rev. P19	154670-STL-ZZ-XX-DR-A-20002 Rev. P23
Proposed Courtyard Elevations	Stride Treglown	154670-STL-ZZ-XX-DR-A-20003 Rev. P19	154670-STL-ZZ-XX-DR-A-20003 Rev. P23
Proposed Context Elevations	Stride Treglown	154670-STL-ZZ-XX-DR-A-20010 Rev. P19	154670-STL-ZZ-XX-DR-A-20010 Rev. P23
Proposed Sections A & B	Stride Treglown	154670-STL-ZZ-XX-DR-A-ZZ-30000 Rev. S2_P19	154670-STL-ZZ-XX-DR-A-ZZ-30000 Rev. S2_P23
Proposed Section C & D	Stride Treglown	154670-STL-ZZ-XX-DR-A-ZZ-30001 Rev. S2_P19	154670-STL-ZZ-XX-DR-A-ZZ-30001 Rev. S2_P23
Typical Studio Layout	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-52000 Rev. P17	<b>NO CHANGE</b>
Proposed Strip Elevations and Sections 1	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-20100-PL-P19	154670-STL-ZZ-ZZ-DR-A-20100-PL-P23
Proposed Strip Elevations and Sections 2	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-20101-PL-P19	154670-STL-ZZ-ZZ-DR-A-20101-PL-P23
Proposed Strip Elevation and Sections 3	Stride Treglown	154670-STL-ZZ-ZZ-DR-A-20102-PL-P19	154670-STL-ZZ-ZZ-DR-A-20102-PL-P23
Topographical & Site Levels Survey (Sheet 1 of 3)	Berry Geomatics	02/23	<b>NO CHANGE</b>

Topographical & Site Levels Survey (Sheet 2 of 3)	Berry Geomatics	02/23	<b>NO CHANGE</b>
Topographical & Site Levels Survey (Sheet 1 of 3)	Berry Geomatics	02/23	<b>NO CHANGE</b>
Ground Level Hardworks	Churchman Thornhill Finch	NA	668-CTF-XX-00-DR-L-40001 P02
Ground Level Softworks	Churchman Thornhill Finch	NA	668-CTF-XX-00-DR-L-50001 P02
Level 01 Roof Plan - Ecological Features	Churchman Thornhill Finch	NA	668-CTF-XX-01-DR-L-41001 P02
Level 05 Hardworks	Churchman Thornhill Finch	NA	668-CTF-XX-05-DR-L-41001 P02
Roof Plan Softworks	Churchman Thornhill Finch	NA	668-CTF-XX-ZZ-DR-L-50001 P02
Technical Reports / Documents			
Planning Statement	Turley	N/A	<b>NO CHANGE</b>
Built Heritage and Views Appraisal	Turley	N/A	<b>NO CHANGE</b>
Addendum Built Heritage and Views Appraisal	Turley	N/A	September 2023
Design and Access Statement	Stride Treglown	N/A	<b>NO CHANGE</b>
Design and Access Statement Addendum	Stride Treglown	N/A	September 2023
Proposed M & E Design Strategy	Hulley & Kirkwood	P0573 Rev. P3	P0573 Rev. P4
Transport Statement	Advance Consulting	C22187-ADV-RP-TS-1000(B)	C22187-ADV-RP-TS-1000(D)
Residential Travel Plan	Advance Consulting	C22187-ADV-RP-TP-1001(B)	C22187-ADV-RP-TP-1001(D)
Air Quality Assessment	Apex Acoustics	10268.3 Rev. A	<b>NO CHANGE</b>
Noise Impact Assessment	Apex Acoustics	10268.2 Rev. A	<b>NO CHANGE</b>
Addendum to Noise Impact Assessment	Apex Acoustics	NA	10268.4 Revision B
Bat and Bird Survey Report	Delta Simons	21-1862.01 Issue No. 2	87282.544357 Issue No. 3 (September 2023)
Flood Risk Assessment and Drainage Strategy	Airey & Coles	11301-AAC-XX-XX-RP-C-FRA-DS-01 Rev. P2	11301-AAC-XX-XX-RP-C-FRA-DS-01 Rev. P4
Detailed Unexploded Ordnance (UXO) Risk Assessment	1 <sup>st</sup> Line Defence Ltd	DA15520-00	<b>NO CHANGE</b>
Management Plan	Very Life	N/A	4 <sup>th</sup> Draft July 2023
Daylight and Sunlight Report	Point 2 Surveys Limited	P2842 Version 1 – Draft 2.	P2842 Version 2
Pre-Demolition BREEAM Audit	Bath Demolition Audit	N/A	<b>NO CHANGE</b>
Energy Statement	Hulley & Kirkwood	P0573 Rev. A	P0573 Rev. B
Statement of Community Involvement	Devcomms	N/A	<b>NO CHANGE</b>
Preliminary Ground Investigation Report	Red Rock Geo	RP7613-GIR	<b>NO CHANGE</b>
Archaeological Desk Report	AC Archaeology Ltd	ACD2848/1/0	<b>NO CHANGE</b>
Co-Living Need and Opportunity Appraisal	JLL	Version 2	<b>NO CHANGE</b>
BREEAM Security Needs Assessment	McLaren	N/A	1 <sup>st</sup> September 2023
Sustainability and Energy Statement	Faithful + Gould	N/A	September 2023
Fire Strategy	Orion	OF-000974-FSS-01	OF-000974-OFS-01-A