



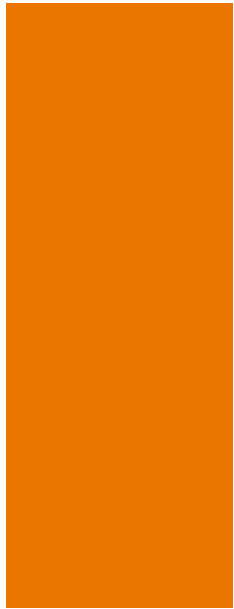
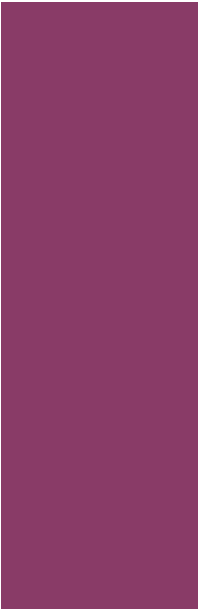
# UNIVERSITY OF EXETER

## Outline Application for Student Accommodation and Associated Infrastructure

### Clydesdale and Birks Residential Project

#### Planning Statement

November 2020



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# 1.0 Introduction

## 1.1 Introduction

- 1.1.1 This Planning Statement has been prepared by WYG on behalf of the University of Exeter in support of an Outline planning application at the Clydesdale, Birks Grange village and Nash Grove halls of residence, (the submitted Outline application) to build student accommodation, ancillary/amenity facilities, plant space and bike stores (up to a maximum of 49,821 sq metres gross internal floor area), with associated infrastructure, demolition of existing buildings, provision of solar panels at Holland Hall Car Park and landscaping (all matters reserved).
- 1.1.2 In addition to the above new build elements, the proposals also include the refurbishment of Birks Grange Blocks A-E halls of residence including external alterations to the appearance of the building walls, windows and roof, including roof mounted solar panels. (all matters reserved).
- 1.1.3 These proposals would deliver a net increase of between approximately 1,200 to 1,250 student bedrooms within the University campus. The precise number of bedrooms and their layout, access, scale and appearance would be determined by a future Reserved Matters application. This outline application does however seek to determine the maximum floor area of the proposed accommodation and provides a series of parameter plans, which are to be determined. These parameter plans will fix important matters such as the maximum height of the buildings within different locations of the site.
- 1.1.4 A key feature of this development is that all new buildings are to be constructed to Passivhaus standards. The University has made this commitment in its response to the Environment & Climate Emergency.
- 1.1.5 In summary, the site comprises of the following 4 key areas:
1. The Clydesdale and Nash Grove halls of residence – Demolition of the existing Clydesdale and Nash Grove accommodation buildings and the construction of new student accommodation buildings ranging in height from 3 to 8 storeys. Ancillary services, such as a shop, café and facilities are to be provided in the ground floor of some of the buildings.
  2. The Estate Services Centre – Demolition of buildings, greenhouses and structures at the existing Estate Services Centre and the construction of a new 3 and 4 storey student accommodation building.
  3. The Birks Grange Village refectory – Demolition of the existing Birks Grange refectory building and the construction of a new 6 storey student accommodation building, with ancillary social and amenity space on the ground floor.
  4. Birks Grange Village Student residences A to E – Refurbishment of existing accommodation blocks to Passivhaus (EnerPHit) standards. The refurbishment works include changing the accommodation

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from catered halls to self-catered halls by introducing a kitchen within each flat. In upgrading the performance of the building to Passivhaus standard, it is likely that external alterations to the building walls, windows and roof will be required, including roof mounted solar panels. Details of these changes are reserved for future consideration and would be applied for at a later Reserved Matters application.

- 1.1.6 It should be noted that a separate Outline planning application has been submitted to relocate the existing Estate Services Centre, referred to at point 2 above, to a new location at Rennes Drive.
- 1.1.7 This statement provides a review of the application proposals and relevant planning policy for the site. It then considers the town planning merits of the proposal when reviewed against both relevant policies in the Exeter City Council development plan and other material considerations.

## **1.2 Structure of Statement**

- 1.2.1 This statement is structured as follows:

- Section 2: Provides details of the application site, and the proposed development.
- Section 3: Summarises the planning policy context.
- Section 4: Considers the planning considerations relevant to the development proposal.
- Section 5: Sets out the conclusions of the planning assessment.

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## 2.0 The Site and the Proposed Development

### 2.1 Introduction

- 2.1.1 This section of the statement provides a description of the application site, surroundings, and the proposal.

### 2.2 The Site and Surroundings

- 2.2.1 The application site comprises an area of land on the western side of the University of Exeter's Streatham Campus, approximately 1km north of Exeter city centre.
- 2.2.2 The University of Exeter is a top ten UK university and is part of the Russell Group of research-intensive universities. The university has three campuses: Streatham Campus and St Luke's Campus in Exeter, and Penryn Campus in Cornwall which is shared with Falmouth University. The Streatham Campus (in which the application site is located) is the largest campus, where the majority of its teaching and research takes place.
- 2.2.3 The application site itself covers an area of approximately 6.37ha and is predominantly a brownfield site containing existing halls of residence (Clydesdale, Birks and Nash Grove halls), a refectory building and the existing Estate Services Centre. The site is located to the west of the campus centre and straddles a Pinetum that is not affected by the proposals. Notable campus buildings on the east boundary of the site are Holland Hall, which sits above the proposed development in the landscape, Mardon Hall, which is not listed but is nonetheless a heritage asset and Reed Hall, which is a Grade II listed building.
- 2.2.4 Grafton Road, a footpath rather than a road, forms the north boundary of the site. Grafton Road has the appearance of a sunken lane flanked on both sides with hedges and trees. Immediately adjacent to Grafton Road are residential properties at Glenthorne Road, Clydesdale Road and Highcroft Court.
- 2.2.5 The B3183, Cowley Bridge Road/New North Road is located to the west of Birks Grange Village, which is a key route into the city from the north. It leads to Exeter St David's railway station, approximately 750m from Birks Grange Village.
- 2.2.6 The south boundary of the site comprises the existing Birks Grange Village Blocks N, P & Q and the existing Estate Services Centre. The latter is located on made ground known as the Birk's Bank and has a steep vehicular access leading to Clydesdale Avenue within the campus. The southern part of the application site boundary also includes a 280m (approx.) section of Streatham Drive where a new footway is to be provided. A number of residential properties are located adjacent to the south boundary of the site at Streatham Drive, Lodge Hill, Elmbridge Gardens and Dunvegan Close.

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## 2.3 Planning History

- 2.3.1 The Exeter University Streatham Campus as a whole has an extensive planning history in association with the growth of the University. Birks Grange Village is the most recent development within the application site. WYG obtained planning permission for these buildings in 2009 (planning reference 09/0279/03). The Clydesdale and Nash Grove buildings were built in the late 1980s and early 1990s. The existing Estate Services Centre has been located in its current position for a number of decades.
- 2.3.2 As discussed at section 3.3 of this statement, the application site has been identified as an area to be redeveloped to provide a higher density development within the University of Exeter Masterplan Framework SPD 2010 (the Masterplan Framework). The Masterplan Framework identifies a number of opportunities as part of a comprehensive development strategy towards meeting student accommodation growth at the Streatham Campus.
- 2.3.3 The submitted Outline application follows a similar planning process to the East Park student accommodation development, which is currently under construction. The East Park development would provide 1,182 bedrooms and is also part of the Masterplan Framework strategy. The East Park Outline application (planning reference 16/1232/01) set the overall floorspace that could be developed (up to 32,230 sq m) and a number of important restrictions upon the heights of buildings, the number of storeys which could be developed in different areas of the site and the overall development area within the site. These restrictions are in the form of three approved parameter plan drawings, namely the Building Heights Parameter Plan, the Land Use Parameter Plan and the Landscape and Biodiversity Plan.
- 2.3.4 The submitted Outline application also seeks to set the maximum permitted floor area of the development and provides a number of Parameter Plans that are to be determined in order to set a series of guiding principles for the next, detailed, Reserved Matters stage. These parameters are discussed further in section 2.5 of this statement and the accompanying Design and Access Statement (DAS) that accompanies the submitted Outline application.

## 2.4 Pre-Application Consultation

- 2.4.1 A Statement of Community Involvement (SCI) has been prepared with the submitted Outline application that provided details of the pre-application consultation undertaken as part of the University's commitment to early engagement and consultation with the local community and stakeholders.
- 2.4.2 The SCI describes in more detail the pre-application consultation carried out. In summary the following consultation took place:
- Two day public exhibition on Tuesday 18 and Wednesday 19 February 2020 in The Innovation Centre, University of Exeter, Rennes Drive, Exeter EX4 4RN from 15.30-20.00 each day.

- University website consultation from 18 February to 11 March 2020, with over 1,000 unique views of the exhibition material, at the web address below:  
<https://www.exeter.ac.uk/about/vision/capitalstrategy/featuredprojects/newstudentresidences/claydesdale-birks/>
- Design Review Panel Presentation
- Pre-application discussions with the Council's Planning and Landscape officers.
- Separate presentations were planned with the Students Guild and Exeter City Council Planning Members Working Group (PMWG), however unfortunately due to the Covid-19 crisis these meetings were cancelled. A virtual meeting with the Students Guild representatives took place on 25 March 2020 and a copy of the PMWG presentation was shared with the planning officer.

- 2.4.3 This pre-application consultation has led to a number of substantive amendments to the proposals, particularly with regard to the massing of the buildings where they are in relatively close proximity to neighbouring residential properties. The evolution of the design of the proposals throughout the consultation process is described in the accompanying DAS.
- 2.4.4 The University will continue to engage with the local community and the Council throughout the submitted Outline application process and during any future detailed planning and construction phases.

## 2.5 The Submitted Outline Proposals

- 2.5.1 As an Outline application, matters in relation to access, layout, appearance, landscaping and scale are reserved for a future Reserved Matters application. As previously described however, the submitted Outline application does seek to fix the permitted maximum floor area of the development of 49,821 sq m. The following Parameter Plans are also submitted to fix the massing and spatial characteristics of the development:
- Land Use Parameter Plan
  - Building Height Parameter Plan
  - Landscape and Biodiversity Parameter Plan
- 2.5.2 A Demolition Principle Plan is also submitted to indicate the buildings to be demolished within the application site.
- 2.5.3 The Indicative Masterplan shows a potential layout that complies with the above restrictions placed by the parameter plans. A Landscape Masterplan has also been prepared to demonstrate how a comprehensive landscape strategy can be provided with the development. These Masterplans are also

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supplemented by a Movement Principles Plan to indicate existing and proposed key access and movements points around the site and how these will work when the site is operational.

- 2.5.4 At this Outline application stage the layout is purely indicative, however the proposals do give an indication of the scale and potential number of rooms within each block. The indicative layout shows 8 development blocks ranging from 3 to 8 storeys in height, and a net increase of between approximately 1,200 and 1,250 rooms. The submitted DAS describes the environs of each of the proposed blocks in turn, the rationale for its design and potential yield in terms of height and bedroom numbers.
- 2.5.5 Should the submitted Outline application be approved, it is expected that conditions will be imposed on the planning permission stating that the development shall not exceed 49,821 sq m (Gross Internal Floor Area (GIFA)) and that the development shall be built in accordance with the proposed Parameter Plans. Any subsequent Reserved Matters application must not exceed the permitted floor area and must comply with requirements of the Parameter Plans. The total figure of 49,821 sq m includes 44,613 sq m of residential accommodation, 1,170 sq m contingency for additional study space, 1,724 sq m ancillary/social space, 1,864 sq m plant room space and 450 sq m for external bike stores.
- 2.5.6 The Outline application was prepared in April 2020, following a period of public and stakeholder consultation, but was not submitted to Exeter City Council (the Council) due to Covid-19. The application has been reviewed in light of Covid-19 to ensure that the proposals are fit for purpose in the event of a future similar pandemic. The 1,170 sq m contingency for additional study space, referred to at paragraph 2.5.5 above, is a result of this review, further details of which are provided in the accompanying Covid-19 Statement that has been submitted with the application. For clarity, the amount of bedroom accommodation has not increased as a result of this additional contingency floor area.
- 2.5.7 The reason for this two part Outline and Reserved Matters planning process is so that once Outline permission is granted and the extent of development fixed, this enables potential operators of the accommodation to develop plans against a set of agreed and consistent principles. The preferred bidder will then submit the subsequent Reserved Matters application, in a model known as Design, Build, Finance and Operate (DBFO).
- 2.5.8 The University has issued a White Paper in response to the Environment & Climate Emergency. In accordance with the White Paper, all new buildings will be designed to Passivhaus standards. The refurbishment works to Birks Grange Village Blocks A-E will be carried out to Passivhaus EnerPHit standards, which are the equivalent Passivhaus standards to conversion/refurbishment works.
- 2.5.9 Section 1.1 of this statement summarises the 4 distinct elements of the submitted Outline application. The submitted DAS provides significantly more detail in respect of these proposals. Provided below are further details of elements of the proposals that have planning implications that will be addressed in this statement.



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- 2.5.10 Planning permission is required to demolish buildings and as such the submitted Outline application includes a demolition plan of all buildings to be demolished. Essentially all of the existing buildings within the application site boundary are to be demolished and replaced with student accommodation, save for the existing Birks Grange Village Blocks A-E that are to be refurbished.
- 2.5.11 The proposals within the Clydesdale and Nash Grove area of the site involve the demolition of the existing Clydesdale and Nash Grove accommodation buildings and the construction of new student accommodation buildings ranging in height from 3 to 8 storeys. Ancillary services, such as a shop, café and facilities are to be provided in the ground floor of some of the buildings. These proposals also involve building on an existing pair of tennis courts. It is proposed to relocate these tennis courts elsewhere on the campus. This will ensure that the overall availability of courts at the campus is not reduced. It is also proposed to provide elevated solar panels at the Holland Hall car park, similar to those installed at car Park B recently. By elevating the solar panels, the parking spaces below are still useable. As this is an outline application, the appearance of the panels is reserved for a future Reserved Matters application.
- 2.5.12 The existing Estate Services Centre is to be demolished, including the greenhouses and structures at the existing Estate Services Centre and the construction of a new 3 and 4 storey student accommodation building. As a result of feedback from neighbours to this part of the site, the scale of the proposed building has been reduced. The existing facilities are now life expired and in need of replacement, which frees up the existing site for redevelopment. The steep access to Clydesdale Avenue is also a functional disadvantage of the existing site.
- 2.5.13 It should be noted that a separate Outline planning application has been submitted to relocate the existing Estate Services Centre to a new location at Rennes Drive.
- 2.5.14 The Birks Grange Village refectory is a life expired building and in need of replacement. Again, this frees up an opportunity to redevelop this site to provide a new 6 storey student accommodation building, with ancillary social and amenity space on the ground floor.
- 2.5.15 The Birks Grange Village Student residences A to E are to be refurbished to Passivhaus (EnerPHit) standards. The refurbishment works include changing the accommodation from catered halls to self-catered halls by introducing a kitchen within each flat due to a decline in demand for a catered offer. Following these works, there will no longer be a need for the Birks Grange Village refectory where students in residences A to E currently obtain meals.
- 2.5.16 The accompanying Energy and Passivhaus report describes that the refurbishment to EnerPHit standards will require various external changes to the building. In upgrading the performance of the building to Passivhaus standard, it is likely that external alterations to the building walls, windows and roof will be required, including roof mounted solar panels. Details of these changes are a reserved for future consideration and would be applied for at a later Reserved Matters application.

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2.5.17 Finally, the application site area, denoted by the red line on the submitted Site Location Plan, is a rather irregular shape for a number of reasons. Part of the red line extends towards the B3183/Cowley Bridge Road/New North Road, even though no highways works are required in this location. This is because it is a requirement for the red line to connect with an adopted highway. The red line also extends along Streatham Drive, where a new footway is proposed on the east side of the road. The red line must also be contiguous, hence the thin area of connecting red line area between Birks Grange Village and the existing Estate Services Centre.

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## 3.0 Planning Policy Context

### 3.1 Introduction

- 3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.1.2 This section of the Planning Statement considers the planning policy context relevant to the proposed development as contained in the Development Plan and other policy documents material to the application's determination.

### 3.2 The Development Plan

- 3.2.1 The statutory Development Plan for Exeter currently comprises the following:
- Exeter Core Strategy (2012)
  - Saved Policies from the Exeter Local Plan First Review 1995-2011 (2005)
- 3.2.2 On the Local Plan Proposals Map, the Streatham Campus (including the application site) is covered by saved Policy E4 (Exeter University Campus) of the Local Plan that supports the principle of providing student housing at the application site.

#### **Exeter Core Strategy**

- 3.2.3 The Core Strategy was adopted in February 2012. It sets out policies to guide future development and change in Exeter city for the period up to 2026. The policies of most relevance to the application proposals have been summarised below.
- **Policy CP5:** specifically supports the provision of purpose built student accommodation. The accompanying text to Policy CP5 refers at paragraph 6.28 recognises the importance of the University of Exeter to the prosperity of the city. It also recognises the increasing student population in Exeter and describes that ideally this demand should be met through the provision of purpose built accommodation on, or close to, the University Campuses.
  - **The accompanying text to Policy CP5** (para 6.28) states that 'The University' aims to provide housing for all full-time students who want it is supported because it will ease pressure on existing family housing. 75% or more of additional student numbers should be accommodated in purpose built student housing. New purpose built housing should be located on, or close to the University Campuses...'

- **Policy CP4:** describes that in meeting the development targets, increased densities clearly have an important role to play. Policy CP4 states that Residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network.
- **Policy CP15:** requires residential developments to achieve Code for Sustainable Homes Level 4 (or a 44% reduction from the 2006 Part L energy standards. For non-domestic development there is a requirement to achieve BREEAM 'Excellent' standard.
- **Policy CP17:** requires that all proposals for development will exhibit a high standard of sustainable design that is resilient to climate change and complements or enhances Exeter's character, local identity and cultural diversity.

#### 3.2.4 Other relevant Core Strategy policies include the following:

- CP1: Spatial Approach
- CP4: Density
- CP9: Transport
- CP10: Meeting Community Needs
- CP11: Pollution
- CP12: Flood Risk
- CP17: Green Infrastructure, Landscape, Biodiversity and Protected Sites and Species

#### **Saved Policies from the Exeter Local Plan First Review**

3.2.5 The Exeter Local Plan First Review was adopted in March 2005. The Secretary of State confirmed that the majority of the Local Plan First Review policies will be saved until they are replaced by policies in the Local Development Framework. Of the saved policies the following are considered to be of most relevance to the proposals:

- **Policy E4:** specifically relates to the university campus and states that the development of education uses, student housing and research and development initiatives, including ancillary production will be permitted on the university campus provided that the character and setting of the campus is protected.
- **Policy H5:** states that the development of special needs or student housing will be permitted provided that:

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- a) The scale and intensity of use will not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on-street parking problems;
  - b) The proposal will not create an over concentration of the use in any one area of the city which would change the character of the neighbourhood or create an imbalance in the local community;
  - c) Special needs housing is located close to local shops and services, community facilities and bus routes;
  - d) Student accommodation is located so as to limit the need to travel to the campus by car.
- **Policy C4:** notes that the redevelopment within, adjacent to, or otherwise likely to affect the setting of, parks and gardens of special or local historic interest will not be permitted if the proposals:
    - a) would involve the loss of features considered to form an integral part of the character or appearance of the park and garden; and
    - b) would otherwise detract from the enjoyment, layout, design, character, appearance, or setting of the park and garden.
  - **Policy LS4:** development that would harm a site of nature conservation importance or a site of local interest for nature conservation or a regionally important geological/geomorphological site or landscape features which are of importance for wild fauna or flora, or wildlife corridors will only be permitted subject to the following:
    - a) the need for the development is sufficient to outweigh nature conservation considerations; and
    - b) the extent of any damaging impact is kept to a minimum and appropriate mitigation and compensatory measures are implemented.

3.2.6 Other relevant Local Plan policies are as follows:

- AP1: Design and Location of Development
- H5: Diversity of Housing
- H7: Housing for Disabled People
- T1: Hierarchy of Modes
- T2: Accessibility Criteria

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- T3: Encouraging Use of Sustainable Modes
  - T10: Car Parking Standards
  - C2: Listed Buildings
  - C3: Buildings of Local Importance
  - C5: Archaeology
  - LS1: Landscape Setting
  - EN2: Contaminated Land
  - EN4: Flood Risk
  - EN5: Noise
  - DG1: Objectives of Urban Design
  - DG2: Energy Conservation
  - DG4: Residential Layout and Amenity
  - DG6: Vehicle Circulation and Car Parking in Residential Development
  - DG7: Crime Prevention and Safety

### 3.3 Other Material Considerations

#### **The National Planning Policy Framework (NPPF)**

- 3.3.1 The revised NPPF was published in February 2019 and sets out the Government's planning policies for England and how these are expected to be applied. The revised NPPF replaces the previous NPPF published in March 2012 and July 2018.

#### ***Presumption in Favour of Sustainable Development***

- 3.3.2 The revised NPPF continues to set out a presumption in favour of sustainable development; it identifies three facets of sustainable development: economic, social and environmental, noting that they are interdependent and need to be pursued mutually.

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- 3.3.3 Paragraph 11 sets out for decision taking, the presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay, or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

### ***Decision-making***

- 3.3.4 Paragraph 38 states that Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

### ***Delivering a sufficient supply of homes***

- 3.3.5 Paragraph 59 states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 3.3.6 Paragraph 61 states that within the above context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including the housing need for students.

### ***Making Effective Use of Land***

- 3.3.7 Paragraph 117 notes that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 3.3.8 Paragraph 118 states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (Part C) and to promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

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- 3.3.9 Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account (amongst other criteria): the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.

***Achieving Well-Designed Places***

- 3.3.10 Paragraph 124 states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 3.3.11 Paragraph 127 states that planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
  - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
  - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
  - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
  - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
  - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>46</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

**National Planning Practice Guidance (NPPG)**

- 3.3.12 In March 2014, the Government published the Planning Practice Guidance website. The NPPG provides further context to the revised NPPF and the sections outlined above. It should be read alongside the NPPF and is a material consideration in the determination of this reserved matters application.

**Development Related to the University of Exeter SPG (June 2007)**



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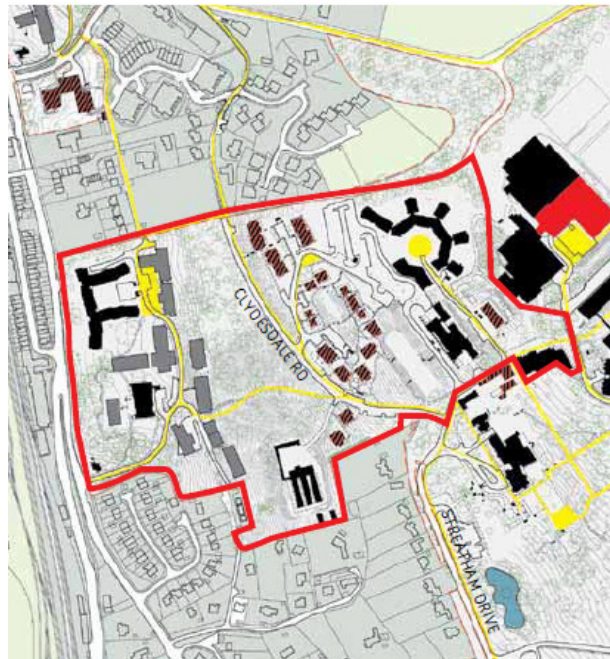
3.3.13 The 2007 SPG contained 9 principles in relation to development related to the University of Exeter, which are summarised as follows:

1. Supports the intention of the University to expand. The City Council, where appropriate, will impose planning conditions or seek a planning obligation to ensure that expansion in the University's teaching, research and general facilities is accompanied by the provision of significant increases in purpose-built student residential accommodation, such that 75% or more of the additional student numbers are accommodated.
2. Expects spaces on Streatham campus to be reserved to meet any additional requirements for teaching related (non-accommodation) facilities. The biodiversity of the site should be conserved and enhanced.
3. Seeks the provision of as much purpose built student housing as possible to reduce the impact on the private sector housing market.
4. Recognises that relatively high density managed accommodation on appropriate sites will need to make a significant contribution to meeting future needs. Developments will be permitted subject to management and supervision arrangements appropriate to the size, location and nature of occupants of schemes. A standard form of planning obligation relating to management arrangements is available from the Council. The planning obligation is enforceable against owners of the land and they will be required to ensure through terms of tenancy agreements that tenants adhere to the management scheme.
5. Favours provision of further student accommodation in the following general locations:
  - a. The City Centre
  - b. St David's Station/Cowley Bridge Road area.
  - c. More intensive use of the Duryard Campus
6. Seeks the investigation of student accommodation as a priority for use of any surplus land at St Luke's campus.
7. Will seek further operational (staff and maintenance related) car parking for student housing schemes than in the past and expects the University and accommodation providers to rigidly enforce no car tenancies.
8. Will expect the University to significantly improve its commitment to sustainable travel, in particular, by funding improved bus services to the campus to provide services throughout the day and into the evening.

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9. Will expect any further major University developments to make significant advances in sustainable development/construction.

### **University of Exeter Masterplan Framework SPD (2010)**

- 3.3.14 The Council has prepared a Masterplan Framework for the University's Streatham Campus, to guide its future development over the period to 2026. The purpose of the masterplan framework is to provide a comprehensive strategy for the development of the university campus taking into the account the need to provide additional student accommodation and academic buildings to meet the increasing student population. The masterplan framework assessed available and underused parts of the campus to meet these expanded needs.
- 3.3.15 The spatial plan of the Masterplan Framework reinforces the principle of additional student accommodation at higher densities to the east and west of the campus heart. In relation to Marden Park, where the Clydesdale, Birks Grange Village and Nash Grove halls of residences are located, the potential for redevelopment is described as follows:
- 3.3.16 "Additional student residences could be created by the consolidation and redevelopment of the cluster of student residences in the Clydesdale area of the Campus. The existing family centre and creche could be redeveloped to provide a higher density development".
- 3.3.17 In addition, the following requirements are sought:
- Any new development should ensure that it creates a sense of place, with clear fronts and backs and entrances that overlook the key public spaces.
  - Any new development should respond carefully to the topography and to views out over the wider landscape.
  - Open up and improve the spatial structure of the woodland.
  - Develop and interpret the arboricultural interest at Birks Bank
  - Develop 'Japanese garden' at Birks.
- 3.3.18 **Figure 1** below shows an extract from the Masterplan Framework showing that the extent of the Marden Park area on the campus where the application site is located. It identifies a number of buildings with potential for future redevelopment.



**Figure 1: Identification of the application site development opportunities within the Masterplan Framework**

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### 3.3.19 **Greater Exeter Strategic Plan (GESP)**

- 3.3.20 The Council is also working alongside Devon County Council, East Devon District Council, Teignbridge District Council and Mid Devon District Council to produce a strategic plan covering the 'Greater Exeter' area. Consultation on the Issues document took place between 27 February and 10 April 2017, alongside a Call for Sites to which the Councils received over 700 submissions.
- 3.3.21 Given the early stages of the GESP, it is considered to carry no weight in the determination of this application.

### **Exeter Development Delivery Plan**

- 3.3.22 The Council is also in the process of preparing a Development Delivery Plan and has made significant progress with the document. Once sufficient progress has been made with the GESP, the Development Delivery Plan can be revised and updated and then moved forward to adoption. The Development Delivery Plan will be in general conformity with the GESP and it is proposed to run the Development Delivery Plan timetable behind the GESP but overlapping with it.
- 3.3.23 Therefore, given the very early stages in preparation, the Exeter Development Delivery Plan is considered to carry no weight in the determination of this application.

### **CIL**

- 3.3.24 Exeter City Council began implementing CIL on 1 December 2013. In Exeter, CIL is charged on residential development, student housing, and retail development outside the city centre.
- 3.3.25 The CIL Charging Schedule sets out a rate of £40 per sq m for student housing whose occupation is limited by planning permission or planning obligation. Given that CIL liability notices are adjusted in accordance with the national all-in tender price index for the year when planning permission is granted, it should be noted that for planning permissions granted in 2018, the resulting CIL rate for student housing is £55.89 per sq m.

## **3.4 Summary**

- 3.4.1 The statutory development plan for Exeter currently comprises the Exeter Core Strategy and the saved policies from the Exeter Local Plan First Review.
- 3.4.2 On the Local Plan Proposals Map, the Streatham Campus (including the application site) is covered by saved Policy E4 (Exeter University Campus) of the Local Plan.

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- 3.4.3 Core Strategy Policy CP5 specifically supports the provision of purpose built student accommodation. The accompanying text to Policy CP5 refers at paragraph 6.28 recognises the importance of the University of Exeter to the prosperity of the city. It also recognises the increasing student population in Exeter and describes that ideally this demand should be met through the provision of purpose built accommodation on, or close to, the University campuses.
- 3.4.4 Other material considerations relevant to the application proposals include the revised NPPF and NPPG. At the heart of the revised NPPF is a presumption in favour of sustainable development, which means approving development proposals that accord with an up-to-date development plan without delay. The NPPF also advocates making efficient use of land at higher densities, especially if this would help to meet identified need for housing, including student accommodation.
- 3.4.5 Having regard to the above prevailing development plan and national policies, it is considered that the matters of most relevance to the applications proposals are: the principle of development; sustainable development, landscape and visual impact, residential amenity, ecology and trees, flood risk and drainage, access and movement and heritage.

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## 4.0 Planning Analysis

### 4.1 Introduction

4.1.1 As set out above, the key matters associated with the proposals are considered to be:

1. Principle of Development
2. Sustainable Development
3. Landscape and Visual Impact
4. Residential Amenity
5. Ecology and Trees
6. Flood Risk and Drainage
7. Access and Movement
8. Heritage

4.1.2 Each matter is considered in turn below.

### 4.2 Principle of Development

4.2.1 The principle of the development is firmly established by both local and national planning policy.

4.2.2 In terms of local planning policy, Core Strategy Policy CP5 supports the growth of the University and for the provision of purpose built student accommodation (PBSA) on the University Campus. Local Plan Policy E4 confirms that the application site is within the defined University Campus.

4.2.3 In terms of national planning policy, the NPPF supports the Government's objective of significantly boosting the supply of homes, including for the needs of groups with specific housing requirements (paragraph 59). Such groups include the housing need for students (paragraph 61). The NPPF presumption in favour of development is also discussed at section 4.3 of this statement.

4.2.4 As shown in figure 1, the application site has been identified within the University Masterplan Framework as an opportunity for additional student residences by the consolidation and redevelopment of existing accommodation buildings. The redevelopment of the application site is therefore a development that has been planned for some time to meet the rising demand for student accommodation at the University.

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- 4.2.5 The need for the proposed accommodation is twofold. Firstly, from a City-wide perspective, Core Strategy Policy CP5 requires 75% or more of students to be accommodated in PBSA to ease pressure on existing family housing. Officer committee reports in relation to student accommodation have however stated that “it is desirable that performance should be closer to or over 100% to address community imbalance”.<sup>1</sup>
- 4.2.6 It is understood that the Council has undertaken a review of student accommodation provision across the City and has found that there is still a significant overall PBSA shortfall despite a recent influx of speculative student accommodation developments in the City in recent years.
- 4.2.7 Secondly, from a University and student perspective, it is essential that sufficient campus based accommodation is provided for the University to meet its ‘student guarantee’. This is a guarantee that first year students are given if they meet the necessary conditions of their University offer. In addition to first year demand, there is also demand for second year ‘returner’ students who choose to be accommodated on campus. The University is currently not able to meet this demand, even with other committed campus-based accommodation developments such as East Park.
- 4.2.8 To conclude on the principle of the development, NPPF paragraph 11 confirms that developments should be approved without delay where they accord with the development plan. Given the demand for the development, local planning policy support for campus based PBSA and national policy towards boosting provision of housing, including student housing, it is considered that the development accords with the development plan and should therefore be approved without delay.

### **4.3 Sustainable Development**

- 4.3.1 The NPPF describes that there is a presumption in favour of sustainable development that comprises of three overarching objectives, namely economic, social and environmental objectives.
- 4.3.2 The proposed development would result in a number of economic benefits during the construction and operational phases of the development. A significant number of jobs would be provided in the construction phases, both directly through the workforce on site and indirectly through the supply chain.
- 4.3.3 When operational, the accommodation and ancillary uses proposed will result in a number of new jobs.
- 4.3.4 High quality accommodation also maintains that ability of the University to attract the highest calibre of students to Exeter. This improves the spending of students within the city economy during the duration of their course. Studies have shown that students often stay in University locations after their studies, boosting the local economy further and increasing the supply of qualified, skilled professionals in the area.

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<sup>1</sup> See, for example, the East Park outline application (reference 16/1232/01) committee report dated 24/04/2017.

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- 4.3.5 The proposed development would result in a number of social benefits for students and the City. Campus based accommodation provides benefits in terms of social experience and wellbeing, especially for first year students leaving home for the first time. The quality of accommodation and ancillary facilities would also be improved through the demolition of the existing outdated residences. Campus based accommodation provides better pastoral care and management of students compared to accommodation within off-campus accommodation. Increasing campus accommodation reduces pressure for speculative PBSA developments within the city. Such developments have been seen in Exeter to reduce the supply of affordable housing. Increasing campus-based accommodation also reduces pressure on the need for homes to be converted to houses in multiple occupation. From a social perspective, campus-based accommodation is the right place for students and for surrounding residential communities.
- 4.3.6 The proposed development would result in a number of environmental benefits. The University has issued a White Paper in response to the Environment & Climate Emergency. In accordance with the White Paper, all new proposed buildings will be designed to Passivhaus standards. The refurbishment works to Birks Grange Village Blocks A-E will be carried out to EnerPHit standards, which are the equivalent Passivhaus standards to conversion/refurbishment works. This would be the first Passivhaus student accommodation project in Exeter and is likely to be one of the largest of its kind in the UK to date. The proposals therefore set a high bar in terms of sustainable construction and exceed the energy and carbon reduction requirements of Policy CP15. Further details of these credentials are provided in the submitted sustainability, Energy and Passivhaus report.
- 4.3.7 In addition to the social benefits of campus-based student accommodation, the application site is also highly sustainable in terms of its location. Students residing within the development will be a short walk from academic and ancillary buildings within the campus. Students are discouraged from bringing cars to the University and no parking spaces are provided within the development other than for disabled users. The campus has excellent public transport links to the city centre and is in close proximity with Exeter St David's train station. The sustainable location and the fact that students are not reliant upon the car as a means of travel will result in significant carbon reduction.
- 4.3.8 The proposed development includes a number of measures to increase biodiversity at the site through a number of measures such as the following:
- Protection of existing landscape where possible including mature trees and existing canopy cover.
  - Introduction of:
    - Species rich grass with a relaxed maintenance regime;
    - Native hedges;
    - Native and non-native shrub mix (some non-native good for pollinators);



- Legacy and ornamental tree mix;
- Site off setting if required, maybe woodland planting, species rich grass (pretty sure it would be required);
- SUDS / Rain gardens (drought tolerant);

4.3.9 The above public benefits are significant and far reaching to the extent that the NPPF presumption in favour of sustainable development is considered to apply to these proposals.

## 4.4 Landscape and Visual Impact

4.4.1 The design process described in section 6 of the DAS has been an iterative process taking into account the massing of the proposals when viewed from wider key viewpoints that have been agreed with by the Council. In the first instance, modelling took place to assess the effect of 10 storey development cores measuring 10m x 10m in a number of positions within the site. This initial exercise enabled an understanding of which parts of the site were more sensitive to landscape and visual impact than others when viewed from the agreed viewpoints.

4.4.2 The pre-application, public and stakeholder process has helped refine the massing of the proposed development to the form proposed. In some areas, the site is able to assimilate taller buildings that proposed from a wider landscape and visual perspective, however the height of buildings have been reduced for other factors such as residential amenity.

4.4.3 The proposed height parameter plan provides a maximum height Above Ordnance Datum (AOD) for different sections of the site. The height parameter plan is to be an approved plan and as such any reserved matters application must be in conformity with it, i.e. it can't propose taller buildings above the specified AOD height in any relevant location.

4.4.4 Block A1 would be a 6 storey building and is flanked by other buildings within the Birks Grange village of a similar scale. Block B1 would be a 3 and 4 storey building, which has been reduced in scale to take account of neighbouring residential properties. Otherwise in landscape and visual terms this part of the site could comfortably assimilate a much taller building. Block B2 would be a 4 storey building that again takes into account neighbouring properties. Blocks C1, C2, D1 and D2 would range from 6 to 8 storey's in height. The central part of the Clydesdale and Nash Grove residences has the most capacity from a wider landscape perspective to assimilate larger buildings and there are no neighbouring residential properties that might otherwise limit the scale of these buildings. Block E1 would be a 4 storey building, which has been reduced from 6 storey's following concerns raised at public consultation. The design of this building has also been amended to reduce the number of windows on the north boundary of the site.

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- 4.4.5 It is not the job of the planning process to hide or screen development. The submitted Landscape and Visual Assessment (LVA) does however set out a number of important criteria, such as limiting the impact upon the skyline or views of Exeter Cathedral, to avoid 'significant' impacts.
- 4.4.6 With regard to the character of the area, the LVA concludes that the development will have an urbanising effect from wider views, but given the urban context and existing University buildings across the valley that already influence this area, the effects are anticipated to be no greater than Minor adverse.
- 4.4.7 With regard to the wider landscape impact, the LVA concludes that the development will be more noticeable and the assessment therefore finds Minor-Moderate adverse effects. Whilst adverse visual effects are a notable finding, due to the nature of the surrounding topography and vegetation it is considered that the proposed buildings can be accommodated at this location. The proposal is considered to be of a height that is appropriate to the surrounding townscape and relates well to adjacent buildings and spaces, adhering to Policy DG1 (ELP), and therefore the effects are considered to be not a 'substantial' finding.
- 4.4.8 The Core Strategy or Local Plan review do not contain policies with regard to assessing wider landscape and visual impacts, although a number of policies do relate to maintain the character and appearance of an area in design terms. Such design policies are reviewed in section 4.5 of this statement in the context of residential amenity. The assessed impacts are however considered to be compatible with Policies CP16, CP17 and DG1.
- 4.4.9 In the absence of local policy, the wider landscape and visual impact of the development should therefore be judged against NPPF policy and in particular paragraph 127, which states (at part C) that developments "should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)".
- 4.4.10 This latter point is an important aspect of the proposed development that is undeniably seeking to increase the density of the site. Essentially this NPPF policy states that increased densities should be supported as a matter of principle and to a degree should not be curtailed by changes to the status quo. In other words, the fact that taller buildings are proposed than are presently located at the site should be considered an acceptable landscape impact change in the context of NPPF paragraph 127.
- 4.4.11 The landscape and visual impact of the development is therefore considered to not be significant as it preserves key characteristics of the landscape from agreed viewpoints and complies with relevant national policy in respect of balancing positive changes, namely the increased density of the site, whilst maintaining the surrounding built environment and landscape setting of the site.

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## 4.5 Residential Amenity

- 4.5.1 Taking into account the residential amenity of neighbouring properties has been a key component of the design process and has led to some significant changes to the scheme as the development design has evolved.
- 4.5.2 These main changes have occurred as a direct result of feedback from the public exhibition that has been discussed with the design team, the Council during pre-application discussions and the Design Review Panel. As reported in the Statement of Community Involvement (SCI), these discussions have led to amendments in two key areas of the site at Blocks B1 and E1.
- 4.5.3 Concern was raised by residents with regard to the impact of Block B1 at the existing Estate Services Centre, which was originally a 6 and 4 storey building, in terms of visual dominance, overlooking, loss of light, noise and lighting.
- 4.5.4 As a result of these concerns, the height of proposed Block B1 has been reduced from 6 and 4 storeys as presented at public consultation, to 4 and 3 storeys. As a result of this change, the approximate number of students in this block has also reduced from 182 to 134 bedrooms.
- 4.5.5 A number of cross section drawings and visual images have been prepared to demonstrate that the relationship with neighbouring properties, as amended, is considered to be acceptable. The submitted Land Use Parameter Plans also show a southern extent of the development zone so that an appropriate buffer/separation distance is maintained. There are opportunities to provide landscaping within the buffer zone to further reduce the impact of the development through planting and to ensure that these areas do not contain areas for students to congregate. There would not be a need for any external lighting in the buffer area that would affect neighbours.
- 4.5.6 The proposals will not cause loss of light to neighbouring properties as the proposed buildings are north of most neighbours. Shadowing plans will be submitted to demonstrate that loss of light will not occur. In terms of overlooking, the separation distances of the proposed buildings are well beyond normal face to face separation distances on 21m used as a 'rule of thumb' when determining planning applications. Whilst some bedroom windows may be seen from a distance, this does not represent unreasonable overlooking in planning terms.
- 4.5.7 The closest residential properties to the south would face the proposed 3 storey element of the building at a minimum separation distance of 35m. As shown on the submitted layout, the building could be designed in such a way that a blank gable end could face residential properties, rather than bedroom windows that are recessed 44m from neighbours. Whilst neighbouring properties may be able to see the proposed building, this relationship is considered to be commonplace in an urban environment such as this.

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- 4.5.8 Properties at Dunvegan Close and Elmbridge Gardens to the east considered that due to the increased height of the site, on the Birks Bank, that Block B1 would be overbearing and overlook properties. The reduction in height of the building is considered to mitigate this concern. It should be noted that properties would be some 120m from Block B1 and as shown on the submitted layout, the majority of the building is recessed further back from this distance. The submitted cross section drawings demonstrate that even with the rise in levels of the site that the separation distances of the proposed Block B1 are acceptable.
- 4.5.9 Concern was also raised by residents with regard to the impact of Block E1 at the north boundary of the site, which was originally a 6, 5 and 3 storey building, in terms of visual dominance, overlooking, loss of light, noise and lighting.
- 4.5.10 In response to these concerns, the height of proposed Block E1 has been reduced to a 4 storey building throughout. The design of the block has also been amended to an 'H' shape to reduce the number of windows facing north towards neighbouring properties. As a result of this change, the approximate number of students in this block has also reduced from 192 to 182 bedrooms.
- 4.5.11 A number of cross section drawings and visual images have been prepared to demonstrate that the relationship with neighbouring properties, as amended, is considered to be acceptable. The 'H' shape means that only gable ends of the building would face northward, meaning windows are further recessed. The building has also been moved further away from the boundary and further than existing student residences in this location.
- 4.5.12 The submitted Land Use Parameter Plans also show a northern extent of the development zone so that an appropriate buffer/separation distance is maintained. There are opportunities to provide landscaping within the buffer zone to further reduce the impact of the development through planting and to ensure that these areas do not contain areas for students to congregate. There would not be a need for any external lighting in the buffer area that would affect neighbours.
- 4.5.13 At the exhibition, shadowing plans were provided demonstrating that overshadowing would not occur even prior to the reduction in height of buildings closest to neighbouring properties. There is even less opportunity for shadowing now that the scale of the buildings has been reduced in these locations. Shadowing plans will be submitted with the planning application.
- 4.5.14 In a planning policy context, Policy CP4 states that residential development should achieve the highest appropriate density compatible with local amenities. It is considered that the proposed development has achieved the aims of Policy CP4 as the majority of larger buildings are located further away from boundaries with residential properties. Where buildings are located at boundaries with neighbouring properties, their scale has been reduced and the buildings designed to reduce the amount of windows facing the boundaries with buffers incorporate that include opportunities for landscaping in between.

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## 4.6 Ecology and Trees

- 4.6.1 Concern was raised at the public consultation exhibition that the development would result in the loss of habitat for protected species. As described within the submitted Ecological Impact Assessment, the site has been fully surveyed to understand the habitats within the site that support protected species. The main ecological habitat in the vicinity of the site is the pinetum, which will remain and not be impacted upon by the development.
- 4.6.2 Habitats for protected species within the site itself are fairly limited given its existing built up nature. The main protected species using the site are bats. In order to understand how bats are using the site a number of surveys have been taken to record flight paths (transect surveys) and building inspections have been carried out. These surveys have revealed that bat roost evidence was found in some of the buildings (droppings), but no bats have been found within the buildings at the time of inspection. If required, opportunities for new bat roosts can be provided in the detailed scheme as mitigation. Other than that, there are limited habitats for protected species in the development areas as shown on the submitted land use parameter plan. This mitigation ensures that there will not be a negative impact upon protected species within the site.
- 4.6.3 The methodology described above has been shared and discussed with the Devon Wildlife Trust (DWT). In addition to surveys for protected species, DWT has requested that the application demonstrate how biodiversity gain can be achieved within the site. The Ecological Impact Assessment describes a suit of measures that can be incorporated within the development to achieve an overall biodiversity gain.
- 4.6.4 It should be noted that Policy LS4 requires the impact upon protected species to be minimised and that appropriate compensatory measures are implemented. This is achieved through replacement bat roost opportunities. The proposals for biodiversity gain measures are considered to exceed the requirements of Policy LS4, although a number of District Councils are insisting on such opportunities despite a planning policy requirement.
- 4.6.5 In terms of the impact of the development upon trees, the Arboricultural Impact Assessment describes that all trees within the site have been surveyed to assess their importance. It should be noted that the Pinetum is located outside of the application site and would not be affected by the proposed development aside from some footpath widening. The most important trees within the site are to be retained where possible, however the development will involve the loss of a number of trees in the Clydesdale and Nash Grove residences area. The majority of these trees were planted as landscaping in connection with the existing accommodation buildings and would be replaced by new planting in connection with the new residences.

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- 4.6.6 Concern was raised by one local resident about the loss of a Magnolia tree growing out of the Birks Grange Village refectory wall, that is to be demolished. At the public consultation stage it was assumed that the demolition of the refectory would automatically result in the removal of the Magnolia tree that is the subject to a Tree Preservation Order. Upon inspection however, it may be possible to retain this tree and the proposed building has been moved away from the tree root protection area. It cannot be ascertained for certain however at this stage whether ground conditions will remain suitable for the successful retention of the tree. At this stage permission is therefore sought to remove the tree provided that upon further investigation at the detailed design stage it transpires that it cannot be retained. This is reflected on the submitted Landscape and Biodiversity Parameter Plan. If it transpires that the tree cannot be retained, cuttings will be taken from the tree that will be propagated by the Estate Services team for planting in suitable locations around the campus. This will ensure that the genealogy of the tree will be maintained as mitigation. For clarity however, the presumption is that the tree will be maintained unless it is proven otherwise. It should be noted that a number of trees were approved to be removed as part of the East Park development that were actually retained. The University has a good track record of saving trees where possible, it grows many new trees for planting around the campus on an annual basis and is responsible for maintaining a significant number of trees around the campus including the Pinetum and other specimen tree groups.
- 4.6.7 Policy LS4 requires landscape features 'which are of importance for wild fauna or flora' to be mitigated for in a similar fashion to ecological impacts as described above in this section. Whilst this policy is not considered to be particularly precise, as there is no definition of what constitutes fauna or flora of importance, the proposals do seek to rigorously retain the most important trees within the site where possible. Those trees that are to be removed as a result of the development will be replaced through a comprehensive landscape plan. As previously described, the proposals will result in an overall biodiversity gain at the site. The requirements of Policy LS4 are therefore considered to be met.

## **4.7 Flood Risk and Drainage**

- 4.7.1 The submitted Flood Risk and Drainage Strategy (the FRA) describes that the site is located in Flood Zone 1, the lowest flood risk category. The FRA describes that the site is connected to existing SWW surface water storm drains and sewerage systems. SWW has confirmed that there is adequate capacity within the existing drainage features to successfully accommodate any increased flows from the development.
- 4.7.2 Given that there is adequate capacity, at this outline stage it is not necessary to show any further drainage details. It is likely that planning conditions will be imposed requiring the submission of detailed surface water and foul drainage connectivity to be agreed by the Council at a later stage when the proposed buildings are designed in full. In addition, typically this detailed information would be provided with any future detailed Reserved Matters application.

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- 4.7.3 The proposed development accords with Policy CP12 insofar as the development is not located in a flood risk area and mitigates against causing flood risk elsewhere using the established principle of connecting surface water drainage to the existing storm water drainage system.

## **4.8 Access and Movement**

- 4.8.1 Section 4.3 of this statement describes that the application site is located in a highly sustainable location with excellent walking and public transport opportunities available to students for their everyday needs. The zero parking nature of the development means that there are no technical vehicular access issues that would normally be associated with more traditional large scale residential development, such as the need for new access junctions or highway improvements. There would be a small increase in service and delivery vehicle trips, however as the submitted Transport Statement describes, such trips will not have a discernible impact upon the local road network.
- 4.8.2 The University has taken the opportunity to review how some internal campus services roads and pedestrian routes can be improved as a result of the development. These opportunities are shown on the submitted Access and Movement Parameter plan and described further within the submitted Transport Statement and DAS.
- 4.8.3 In summary the main vehicular improvements include changing the route that the Holland Hall car park is accessed and to provide a new vehicular route from the existing Estate Services Centre through to Birks Grange Village.
- 4.8.4 The existing vehicular access to Holland Hall, from Clydesdale Avenue, passes through the centre of the site on a steep gradient that is difficult for coaches to access. The new route widens an existing route in front of Holland Hall to allow coach access. The removal of the existing route through the development site also improves the development potential of the site itself that would otherwise be severed by current alignment of the road.
- 4.8.5 The new vehicular route from the existing Estate Services Centre, down the Birks Bank, to Birks Grange Village would be for the use of the Estate Services team only. At present, the Estate Services team has to access Birks Grange Village via the public road access on New North Road/Cowley Bridge Road as there is no internal campus connection between the two sites. The new internal connection would be an advantage to the management of the campus and would avoid the need for Estate Services vehicles to travel on public roads.

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- 4.8.6 In addition to vehicular routes, the development takes the opportunity to improve pedestrian connectivity through new routes shown on the Access and Movement Parameter Plan. These routes include new opportunities to link the site to Holland Hall and to provide a new footway along Streatham Drive. Both of these routes were requested by staff and neighbours to the site in response to the public exhibition. The Streatham Drive footway especially would benefit the development as this route is along the main desire line from the development towards the City centre. At this stage, street lighting is not proposed along the route. During pre-application discussions Officers, it was agreed that a condition could be imposed to control any future lighting scheme if one is required.
- 4.8.7 Although in outline form, the overall proposed floor area includes an assumption that cycle stores will be provided at a size required to accord with the Council's strategy of providing secure cycle storage for 1 bike per 2 students. In practice this has been shown to be a higher ratio requirement than actual usage at the University. Whilst the precise number of cycle store spaces will be a matter for the detailed Reserved Matters stage, this serves to demonstrate that sufficient capacity is assumed within the overall proposed floor area of the development.
- 4.8.8 The proposed development is therefore considered to accord with Policy CP9 due to its car free nature and, the proposed improvements to pedestrian routes and provision of secure cycle storage in accordance with the Council's requirements.

## **4.9 Heritage**

- 4.9.1 The submitted Heritage Statement considers the potential impact of the proposed development upon both archaeological and built heritage assets.
- 4.9.2 In terms of archaeology, the Heritage Statement describes the results of previous archaeological investigations and other historical records. Having undertaken this assessment, the potential archaeological impact of the development is considered to be low. On this basis, the Devon County Council archaeologist has advised that no further archaeological investigation is required in support of this outline application.
- 4.9.3 In terms of built heritage, the Statement considers the impact of development upon two University buildings adjacent to the site, namely Mardon Hall and Reed Hall.
- 4.9.4 Mardon Hall is a large early 20th century brick built four-storey building within the eastern side of the site. It is described as a non-designated heritage asset of low significance, i.e. not a statutorily Listed Building. The development would not change the evidential/architectural and historical values of the building. The development would however result in a minor to moderate impact upon the significance of the building due to the change in the visual prominence of the building.



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- 4.9.5 The NPPF describes at paragraph 197 that a balanced judgement should be taken to the scale of any harm or loss and the significance of non-designated heritage assets. In this regard the development does not directly impact upon the building or its function and only affects one constituent element of the buildings importance, albeit that the overall significance level of the building is low. The overall impact of the development upon Mardon Hall is therefore considered to be relatively low and outweighed by the substantial sustainable public benefits of the scheme described at section 4.2 of this statement.
- 4.9.6 The NPPF tests for impacts upon listed heritage assets, such as Reed Hall, is greater than for non-heritage assets. The Heritage Assessment describes however that the presence of landscaped grounds and mature vegetation to the north and northwest of Reed Hall and, other than glimpses of the tower, there are currently no views from which Reed Hall can be clearly be experienced, nor its architectural value appreciated from the development site. The development is not therefore considered to impact upon any of the elements of setting of the Grade II Listed Reed Hall, which contributes to the overall significance of this heritage asset. On this basis, no changes are predicted to the significance of this asset.
- 4.9.7 The proposed development is considered to therefore comply with Policy CP4 that refers to the protection of heritage assets. It should however be noted that this policy is considered to be outdated considering the more comprehensive and robust tests provided by the NPPF.

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## 5.0 Conclusions

- 5.1.1 This Planning Statement has been prepared in support of an Outline planning application at the Clydesdale, Birks Grange Village and Nash Grove halls of residence, (the submitted Outline application) to build student accommodation, ancillary/amenity facilities, plant space and bike stores (up to a maximum of 49,821 sq metres gross internal floor area), with associated infrastructure, demolition of existing buildings, provision of solar panels at Holland Hall Car Park and landscaping (all matters reserved).
- 5.1.2 In addition to the above new build elements, the proposals also include the refurbishment of Birks Grange Blocks A-E halls of residence including external alterations to the appearance of the building walls, windows and roof, including roof mounted solar panels. (all matters reserved).
- 5.1.3 This Planning Statement describes that there is planning policy support and a presumption in favour of developing the site to provide campus-based student accommodation and to increase the density of accommodation at the site.
- 5.1.4 Whilst the development takes this opportunity to make efficient use of the site in accordance with the NPPF and Policy CP4, the development is considered to be compatible with local residential amenity, landscape and visual impact and the area.
- 5.1.5 A number of significant economic, social and environmental benefits associated with the development have been identified. These include the direct provision of jobs, contributions to the economy of the City economy, improving the quality of and meeting an identified demand for campus-based student accommodation and delivering an overall biodiversity gain. The proposed Passivhaus design standards will also significantly raise the bar of student accommodation in the City and provide a new benchmark for future development proposals to be measured against.
- 5.1.6 The proposals have been informed by thorough public and stakeholder consultation, pre-application discussions with the Council and the Design Review Panel that has resulted in significant positive changes to the scheme.
- 5.1.7 When assessed against relevant planning policy provisions at all levels, it will be clear that the application proposals are acceptable. In summary:
- The principle of campus-based student accommodation is development is supported by Policy CP5 and the site has long been identified for development within the University Masterplan Framework.
  - Given the above and through the identification of a number of economic, social and environmental benefits, the NPPF presumption in favour of sustainable development is considered to apply to the development proposals.

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- The development appropriately increases the density of the site at a level compatible with the protection of heritage assets, local amenities, the character and quality of the local environment in accordance with Policy CP4.
  - The development exceeds the requirements of Policy CP15 through delivery of Passivhaus standards.
  - Where possible the development avoids the loss of important trees and provides opportunities to increase the overall biodiversity of the site in accordance with Policy LS4.
  - The development is not located within a flood risk area and provides appropriate strategies in relation to surface water and foul sewerage in accordance with Policy CP12.
  - The proposal is acceptable in terms of access and highways considerations, proposed improvements to pedestrian routes and provision of secure cycle storage in accordance Policy CP9.

5.1.8 In light of the above, we trust that the local planning authority will grant Outline planning permission for this policy compliant proposal.