Consultation Response from ECC Urban Design and Landscape Officer:

Project/Application - Repair Garage & 81 Victoria Street, St James's

Application ref: 23/0949/FUL

1 The project seeks to demolish existing structures on the site (a single dwelling 'Wisteria House' and garage buildings) and create a new 'co-living' development of 101 'studio' units, together with shared facilities, associated landscape and ancillary uses.

1.1 For the reasons explained below, the project represents a poor response to the context and setting and has many other design failings – therefore we must **OBJECT** to the application.

1.2 The project benefitted from a design review process during the pre-application stage. This was provided by Design West under the Exeter Design Quality Partnership and their guidance report was provided on the 29 March 2023. Many of the topics which we now consider to be poorly resolved were highlighted in their comments and relatively little appears to have been revised in the submitted proposals.

2. The National Design Guide https://www.gov.uk/government/publications/national-design-guide is organised under a number of headings, as the "10 characteristics of a well-designed place", which are used to structure this response:

2.1 *Context*

2.1.1 The immediate setting of the neighbourhood is formed largely from 2 (and some 2.5 + 3) storey buildings, the proposals suggest development of up to 4 storeys above the ground level of the site, which is elevated relative to Victoria Street and many of the other surrounding streets. The scale of the proposals is therefore not in harmony with the setting and since the site is not identified or allocated for intensification then we would expect the density, form and heights to be broadly similar to that which prevails. The Local Plan policy DG1 states that development should:

"(f) BE OF A HEIGHT WHICH IS APPROPRIATE TO THE SURROUNDING TOWNSCAPE AND ENSURE THAT THE HEIGHT OF CONSTITUENT PART OF BUILDINGS RELATE WELL TO ADJOINING BUILDINGS, SPACES AND TO HUMAN SCALE;

(g) ENSURE THAT THE VOLUME AND SHAPE (THE MASSING) OF STRUCTURES RELATES WELL TO THE CHARACTER AND APPEARANCE OF THE ADJOINING BUILDINGS AND THE SURROUNDING TOWNSCAPE;"

And the CP17 policy in the ECC core strategy states,

"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."

St James Neighbourhood Plan states (our underlining):

"*D1: Good quality design*

All new development within St James must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. In St James good design means:

a) achieving high quality design that respects the scale and character of existing and surrounding buildings;

b) respecting established building set back and arrangements of front gardens, walls, railings or hedges;

c) ensuring proposals relate to established plot widths within streets where development is proposed, particularly where they establish a rhythm to the architecture in a street;

d) using good quality materials that complement the existing palette of materials used within St James;

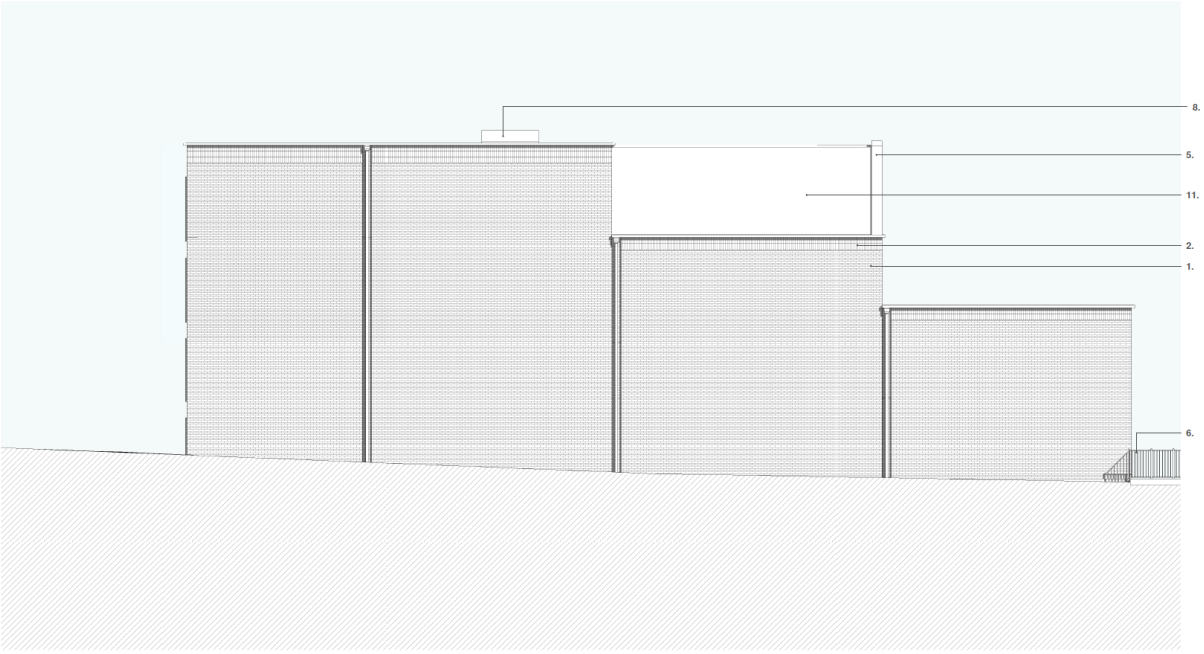
e) adopting the principles of sustainable urban drainage;

f) meeting the requirements of 'Secure by Design' to minimise the likelihood and fear of crime;

g) innovation to achieve low carbon sustainable design.

Good design should provide sufficient external amenity space, refuse and recycling storage and car and bicycle parking to ensure a high quality and well managed streetscape. Planning permission will not be granted for development of poor design that fails to take the opportunities available for improving local character and quality of an area and the way it functions."

2.1.2 Existing houses to Prospect Park are located directly to the north – there will be an overbearing presence to their rear gardens. The proposed massing along this edge of the site rises from 2 to 4 storeys (with a further storey below ground level) and the walls are without any fenestration (see elevation below). The existing trees that currently line this boundary are to be removed (although some design drawings / text suggest that they might be retained, this loss is inevitable - as confirmed by the tree removal drawing in the arboricultural report) and so the proposed development will appear to be extremely oppressive as an outlook from both the existing dwellings and their gardens and the orientation means that the impacts on the availability of sunlight to the gardens will be substantial and permanent. This has been evidenced in the Sunlight + Daylight Report which indicates that several gardens fail compared to the BRE guidelines.



1 North Block_North-East Elevation
1 : 100

The ECC Residential Design SPD explains that, *"Policy DG4 in the adopted Local Plan requires residential development to be designed to allow residents to feel at ease in their homes and gardens (criterion b)."* In terms of natural light, it states, *"DEVELOPERS SHOULD DEMONSTRATE THAT DWELLINGS HAVE SUFFICIENT DAYLIGHT TO ALLOW COMFORTABLE USE AND ENJOYMENT OF HABITABLE ROOMS, GARDENS AND COMMUNAL SPACES. WHERE THERE IS DOUBT ABOUT THE QUALITY OF DAYLIGHT DEVELOPERS WILL BE REQUIRED TO PRODUCE PLANS ILLUSTRATING SHADOW PATHS AT THE WINTER SOLSTICE AND SPRING/AUTUMN EQUINOX (SUNRISE, MIDDAY AND SUNSET)."*

The St James Neighbourhood Plan states (our underlining):

"*SD3: Infill / Windfall Sites*

Proposals to develop small infill/windfall sites for affordable homes for local people or good quality private residential development will be supported where they:

a) <u>have a scale and form which would be complementary to surrounding properties and would not result in the loss of amenity for existing residents;</u>

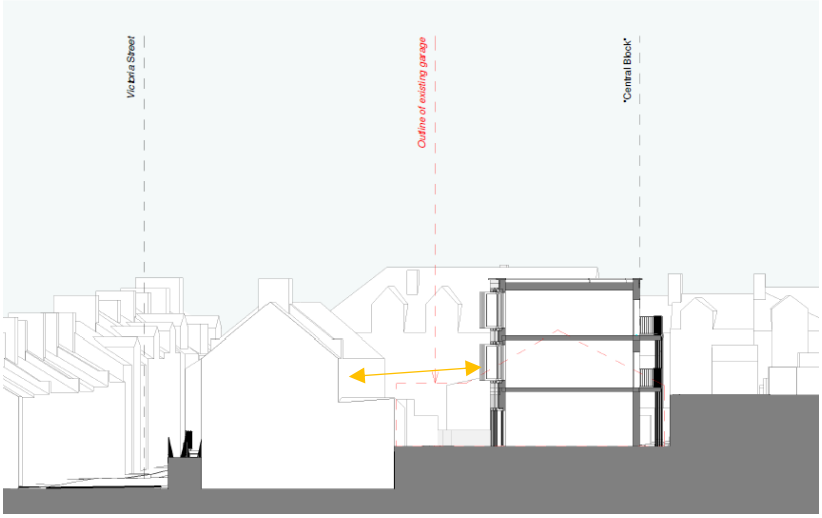
b) would achieve high standards of sustainable and low carbon design;

c) would be accompanied by appropriate provisions for parking, access and storage of waste."

Impacts on the availability of natural light to neighbouring properties have been tested and described in the Sunlight + Daylight Report but the results seem not to have prompted any significant adjustments to the design.

2.1.3 The development is located close to the rear garden / court spaces of existing dwellings to the south (77 – 80 Victoria Street). These rear spaces provide the only

external amenity areas for these properties – triangular 'angled-bay' windows are provided to the studios that overlook these, but there is an overbearing presence from the height and mass of the new building here and, even with the 'deflected' views, inter-visibility down into the outdoor amenity space and to some existing windows will be created. The information submitted does not allow an accurate assessment of this (no survey provided of the rear elevation of 77-80 Victoria Street) but the orange arrows on the extract below (between transparent / clear parts of the bays to approximate window positions) would create a separation distance of just 6 to 7 metres. The ECC Residential Design SPD expects a minimum of 22m to be provided between windows that directly oppose each-other – here there is a diagonal relationship, but that will only have a minor effect. The rear outlook from the existing housing will be oppressive and daylight will be reduced to this north elevation, as evidenced in the site section (also included below) and reported in the Sunlight + Daylight Report.



2.1.4 Although there are no residential windows facing west, the relationship between access decks and the backs of Culverland Street to the north west is poor - Inter-visibility will be created (less than 12m separation distance) leading to a loss of privacy for existing properties and their gardens.

2.2 *Identity*

2.2.1 The character of the building is assisted by the use of brick as the main walling material, but it is shown as buff in colour and the general form and detailing do not draw successfully on local architectural languages (despite the comprehensive and well-considered townscape analysis of the neighbourhood character which has been submitted) nor does it create a distinct and positive new identity. The outcome is a fairly anonymous architectural expression compared to the rich and articulated buildings that form the immediate context.

The Lower Ground Floor (level with Victoria Street) has no active uses presenting to the street and the five floors of stepped massing above it will form an incongruous and out of scale 'stop vista' at the end of South View Terrace:

1 Site_South-West Elevation

Model Wirelines

Options A, B, C and the Architects' model are relatively similar in this view, and are mostly screened by built form and intervening vegetation. However, they protrude above this vegetation slightly in place, changing the skyline slightly. Option D is slightly lower than the other options lower in most places. Options A and C extend the highest above the existing skyline of this view. All options are higher than existing buildings in the view.

The massing suggested by these wire-line outlines above does not seem to be wholly consistent with the submitted drawings.

5.1.1 APPROACH VIA SOUTH VIEW TERRACE ADJACENT TO RAILWAY LINE - PROPOSED INDICATIVE

This 'indicative image' from the DAS does not show the two uppermost storeys of the development – perhaps these were also omitted from the wire-line outline as discussed above?

2.3 *Built Form*

2.3.1 Laundry Room at Lower Ground is without natural light + ventilation and an awkward shape.

2.3.2 Shared kitchen at Ground Floor is without natural light / ventilation / outlook.

2.4 *Movement*

2.4.1 The organisational pattern of the building is unusual for a co-living project. It is normal practice for the reception to oversee and supervise a single main point of entry / exit, but here there are many alternative routes (some completely unseen/unsupervised) which provide access to the stair cores and corridors from which the individual studios are then reached. This 'motel-style' arrangement gives rise to concerns regarding safety and security and the potential for strangers to gain casual access to private and semi-private areas of the development.

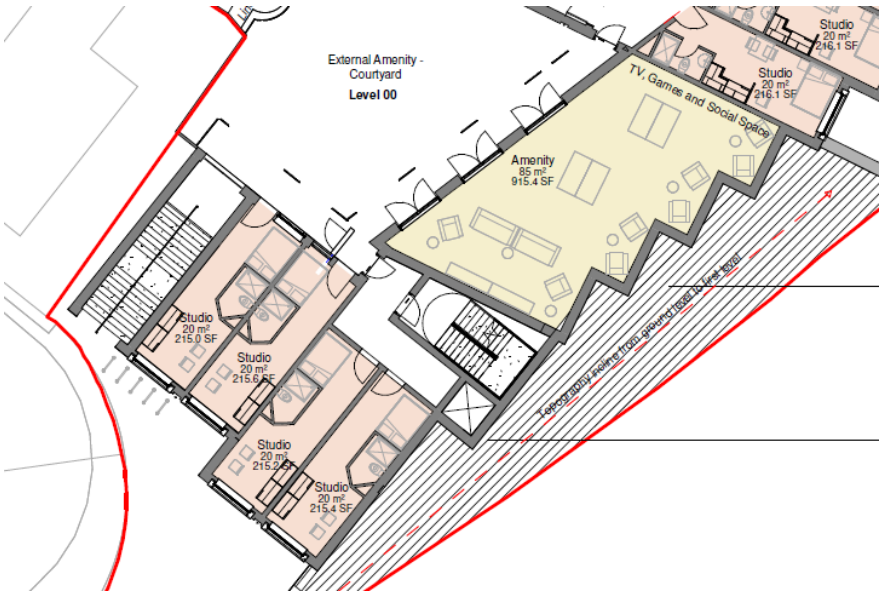
2.4.2 This same pattern means that vertical circulation does not relate well to the shared facilities – laundry, cycle store and bin store located at the Lower Ground level require residents to use the most southerly stair core which is not convenient for all.

2.4.3 No inclusive access is proposed generally to the development– vehicular gate and steep (non-DDA compliant) ramp to the rear or a stepped approach (no public lift provided) from the front. Are there any specially-designed 'accessible' units for

those challenged by mobility? What provision will there be for visitors who may need to rely on inclusive access?

2.4.4 There is no external gate on the lower (street level) main entrance to the site and very poor natural surveillance within the enclosed and sheltered space of the staircase – security and safety is therefore a concern.

2.4.5 Access to the amenity space at Ground Floor is by an (insecure) external route only – non-residents might gain access without supervision?:



2.4.6 The internal layout is confusing with poor visibility and access to stairs from reception – the internal legibility of the building organisation is therefore weak.

2.5 *Nature*

2.5.1 Although some areas of flat roof are shown as 'green' or planted, there is very little space set aside at ground level which might be utilised for replacement trees and/or other more conventional planting. The challenge of improving bio-diversity net gain is not yet mandatory, but ought to be a clear aspiration and would be very difficult for the current design to meet. There is no information regarding the strategy for surface water drainage, but similarly, there is very little space available and suitable for any Suds features such as 'rain gardens', etc.

2.5.2 The St James Neighbourhood Plan states:

EN6: Biodiversity

Proposals which result in a loss of biodiversity will not normally be permitted. Development that is likely to have either a direct or indirect adverse impact upon areas of local biodiversity importance should demonstrate that appropriate mitigation and/or compensation could be provided and where possible achieve a net enhancement to the biodiversity within the ward.

2.6 *Public Spaces*

2.6.1 General access for maintenance, etc to the semi-private 'gap' spaces behind the railway embankment retaining wall (far right, site section 06) and the space to the north of 77-80 Victoria Street is not clearly defined and may rely on a route being negotiated through one of the private studio units?

2.6.2 A 'courtyard' is identified to the rear of the building at first floor level but it is not clear whether this is fully private (shared by residents) or semi-public (since external access does not seem to be fully-controlled?). The degree to which there will be permeability between the courtyard and the interior of the building (except in the event of an emergency escape) and its character as an open space is not apparent from the drawings.

2.6.3 The other two external courtyards to provide amenity to the residents are not laid in any detail and any landscape ideas and the role/purpose of the spaces and the degree of amenity that they will provide is therefore hard to ascertain – all three will suffer from being shaded by the development for long periods in the middle of the day.

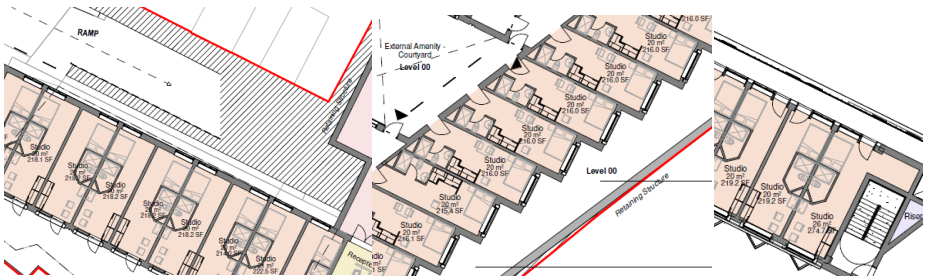
2.6.4 Semi-Private (shared) Roof Terraces are illustrated in the DAS and these are a welcome idea (but the Second Floor Plan shows them as roofs?). The detailed layouts as illustrated do not promote sociable patterns of use and, located at second floor level then, they do not link to any other internal spaces that might relate and help to animate their role (such as a communal dining space or lounge, for instance).

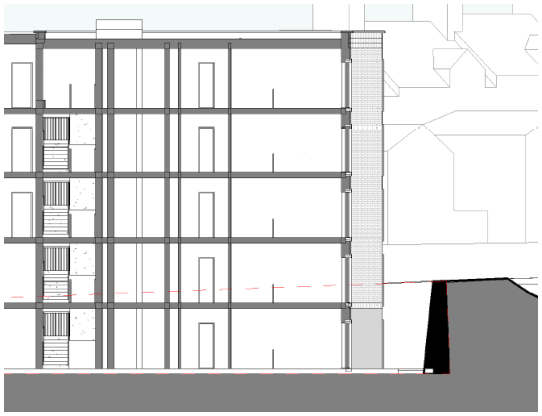
2.7 *Uses*

2.7.1 Residential use is not contentious on this site although the proposals for a co-living form of development is not certainly proven to be feasible, nor demonstrated to be a suitable type in this location – as evidenced by the other points noted here.

2.8 *Homes and Buildings*

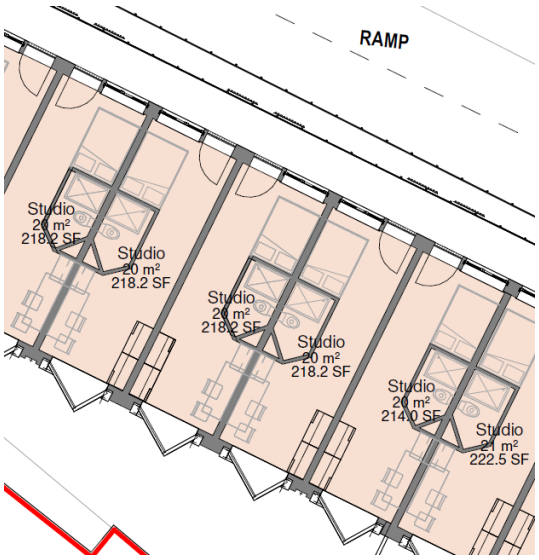
2.8.1 Outlook from many studios is very poor – those that are placed against the access ramp / facing towards the railway retaining wall / next to walkways will all be provided with unsatisfactory outlooks or challenges to privacy and have reduced levels of natural light.





2.8.2 Due to the proximity of the northeast wall of the development to the site boundary, corridors providing access to studios in the northern block are without ‘views out’, nor do they have natural light and ventilation:

2.8.3 The long and thin proportions of many studios (see below) result in a poor internal layout with a high proportion of the internal area therefore used purely as circulation:



Bedspaces placed next to the front doors of some studios will present challenges in terms of reasonable privacy and comfort for residents.

2.9 *Resources*

2.9.1 The access to individual studios is predominantly by means of a 'deck access' arrangement - which means that the routes to communal and shared facilities frequently involve journeys that leave and then re-enter the thermal envelope of the building. Heat will be lost as a consequence of so many external doors being open and closed during a normal day in the life of the building.

2.9.2 The deck access organisation potentially provides dual aspect for ventilation and light but the comparatively narrow width of the wings of accommodation and the E-shaped form of the upper levels will result in a high 'form factor' making a low energy / low carbon building much more difficult to achieve and necessitating higher levels of insulation. Policy encourages the pursuit of low-energy solutions as a product of the fundamental ideas for the planning and layout of a project:

Paragraph (iv) of CP16 says,

"Energy and water consumption must be minimised through appropriate design, layout, orientation, landscaping and materials and by using renewable technologies and integrating SUDS within the scheme (see Policies CP12, CP13, CP14, and CP15). Building design and landscaping must be resilient to internal and external overheating and be sufficiently robust to accommodate the impact of the rise in external summer temperatures anticipated at the end of the building's lifetime."

2.10 *Lifespan*

2.10.1 Parts of the open spaces / gardens might be set aside managed / maintained by residents to encourage and foster a greater sense of ownership and responsibility.

3. *Alternative Strategy*

3.1 Clearly, we have identified many concerns and the optimum use of this brownfield site is likely to be found by exploring a different type of residential development that can more successfully respond to the many constraints. A full and realistic review of those constraints needs to be undertaken before attempting any alternative. It is apparent that the central section of the site (to the rear of 77- 80 Victoria Street) is one of the most challenging parts of the land available to develop. Options that might use this space as external amenity space serving the residents rather than attempting built-form here might be a useful tactic to test within a new layout. Given the contextual constraints and the need to achieve an appropriate scale (massing and height) then we can only expect that that the quantum of floorspace will inevitably have to reduce from that which is attempted by the current scheme. It is likely that more conventional residential forms will be more suited and the eastern end of the site seems to offer the main opportunity to place accommodation that might achieve a good-quality development. Perhaps an apartment typology with external shared amenity space and some dedicated parking could begin to generate a more feasible brief for this site.

Mark Pearson

Principal Officer, Urban Design and Landscape

10.01.23