



26-28 & 30-32 LONGBROOK
STREET, EXETER

PLANNING & ECONOMIC STATEMENT

JUNE 2017

rengen 

aspect360
planning ■ design ■ development

Aspect360 (SW) Ltd
G17 Kestrel Court
1 Harbour Road
Portishead
BS20 7AN

www.aspect360.co.uk
01275 390548

1. INTRODUCTION

- 1.1 This Statement has been prepared by Aspect360 (SW) Ltd in support of an application by Rengen Developments Ltd for a mixed-use redevelopment of the King Billy Public House and adjoining former garage site on Longbrook Street, Exeter, to provide 34no. student cluster flats (Sui Generis) with a commercial unit and a restaurant/pub at street level, in a 7/8/9 storey building.
- 1.2 Planning permission has previously been granted for a seven-storey building on the former garage site (no's. 30-32 Longbrook Street) to provide student accommodation (25no. studio units - application reference 15/0645/03). The consent is extant until 18 March 2019 and is a strong material consideration in the assessment of this scheme, having established the baseline conditions for the redevelopment of this part of the site. A summary of the approved application is provided at Chapter 3.
- 1.3 This application follows a consultation with the Exeter Design Forum in February 2017, which has influenced the design approach, particularly the building's scale/massing/height. A summary of the feedback received and how this has influenced the submitted proposal is set out in the submitted Design and Access Statement by Grainge Architects, which supports the planning application.
- 1.4 This supporting statement identifies and addresses the most pertinent planning issues associated with the proposal within the context of the Development Plan, national policy, and other pertinent material considerations. It should be read in conjunction with the submitted application drawings and Design and Access Statement by Grainge Architects.

2. THE LOCATION, CONTEXT & SITE

- 2.1 The application site comprises the former Shepherd's Garage site on Longbrook Street (no's. 30-32) in the centre of Exeter, just beyond the High Street, and the adjoining King Billy public house (no's. 26-28 Longbrook Street). The garage was demolished in 2007 and that part of the site has remained vacant, enclosed by hoardings. The site backs on to a service yard associated with the adjacent John Lewis department store, however the pub benefits from a right of access and is understood to be serviced from the rear.
- 2.2 The site is located within the town centre and surrounded by a number of tall buildings, including the city's tallest building; John Lewis, which adjoins the site's south-western boundary. There is a modern six-storey building opposite the site on Longbrook Street. Longbrook Street is characterised by predominantly three-storey buildings, with greater scale/height/massing at its southern end and a more domestic scale further north. The vacant part of the site, which was a former garage, adjoins a three-storey Victorian terrace with A1/A2 units on the ground floor.
- 2.3 The existing pub is a two-storey, red brick building of octagonal shape built circa the 1980's, and its height; scale; form and massing (as well as its architectural appearance) appears at odds with the neighbouring buildings surrounding the Longbrook Street/Bailey Street; B3183 road junction.
- 2.4 The site is outside but in close proximity to the Longbrook Conservation Area (CA) and is visible from within the CA.
- 2.5 The site is in a Low Risk Flood Zone and is thus sequentially preferable for development.

SERVICES AND ACCESSIBILITY

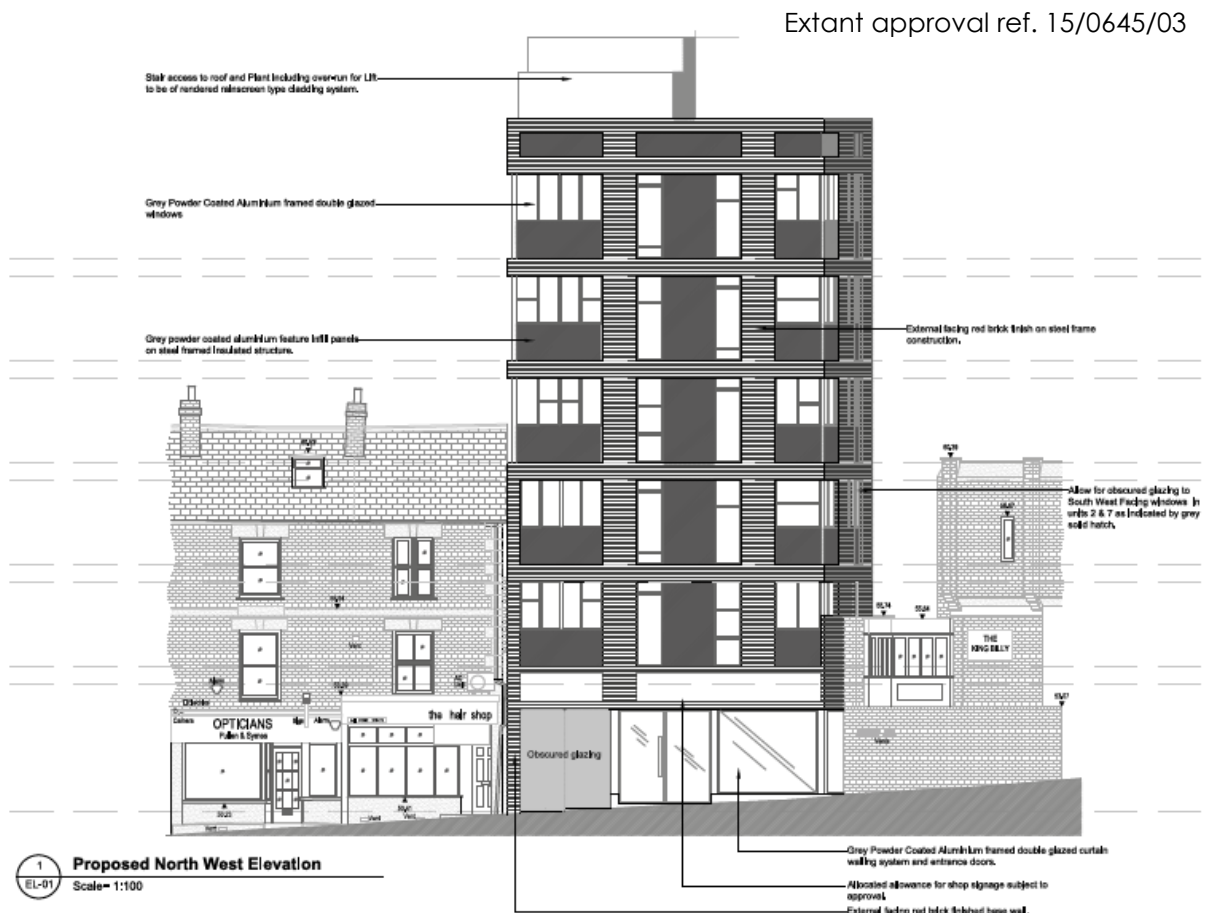
- 2.6 The application site is highly sustainably located by virtue of its town centre location, on the doorstep of a wide variety of town-centre uses, comprising retail; commercial; leisure; food and drink uses; and housing.
- 2.7 It is also within an easy walk or cycle of two railway stations.

Longbrook Street, Exeter Planning Statement

- 2.8 The University of Exeter is approximately 1300m to the north-west, which is an approximate 15 minute walk, or can be accessed by bus with an approximate journey time of 10 minutes. The closest bus stops are at Sidwell Street, which provide a number of services including the D/H Service that serve the city centre; Exeter University's Streatham and St Luke's campuses; Tesco at Rydon Lane Retail Park; and Royal Devon and Exeter Hospital.

3. RELEVANT PLANNING HISTORY

- 3.1 The application site includes the King Billy Public House (no's. 26-28 Longbrook Street) and no's. 30-32 Longbrook Street.
- 3.2 Part of the site (no's. 30-32 Longbrook Street) has extant planning consent until 18/03/2019 for the construction of a six-storey building for student accommodation (25no. studio units). The application (reference 15/0645/03) was approved on 18/03/2016 subject to conditions, and a Unilateral Undertaking dated 14/03/2016, which restricts the accommodation to students only; requires submission, approval and implementation of a Student Intake Management Scheme; and imposes a number of restrictions relating to car parking and movements.



Longbrook Street, Exeter Planning Statement

- 3.3 The vacant part of the site had planning consent prior to the 2016 approval for a three-storey commercial redevelopment comprising shops and offices at no's. 30-32 Longbrook Street. This was granted on 12/10/89, and an application for renewal (ref. 94/0155/03) was approved a few years later (no dates provided on the Council's website).
- 3.4 There is no relevant planning history for the King Billy Public House.

4. DEVELOPMENT PROPOSALS

4.1 The submitted application seeks:

"Demolition and change of use of existing pub (A4) to form a new mixed-use scheme over 7, 8 and 9 storeys. The scheme will comprise Commercial Units (A1, A3/A4) on the ground floor with student accommodation to the upper floors (sui generis)."

4.2 The scheme proposes a retail unit (97sq m) and a restaurant/bar (83sq m) on the ground floor with 8no. floors of student accommodation above (124no. bedrooms arranged in 34no. cluster flats) in a 7/8/9 storey building. The proposed student mix comprises:

- 1no. 2 bedroom unit;
- 18no. 3 bedroom units;
- 7no. 4 bedroom units;
- 8 no. 5 bedroom units.

4.3 The proposed retail unit and the pub/restaurant would both be sited on and accessed via Longbrook Street and separated by the entrance/foyer area to the student accommodation. The proposed pub/restaurant would have a dual aspect over Longbrook Street and Paris Street.

4.4 The scheme proposes nil car parking and the proposed land uses would be serviced from the rear, consistent with the current arrangements. The public house has a right of access over the service yard associated with John Lewis and this right is transferrable to the proposed development.

4.5 Separate and fully enclosed/secure refuse/recycling and bike storage is proposed to the rear of the building. The bike store (20no. bikes double stacked) would be associated with the student accommodation.

4.6 The proposed building would occupy the majority of the site with a building line parallel with the existing terrace on Longbrook Street. The building would adjoin the rear of John Lewis and the side of no. 34 Longbrook Street. Its scale/height/massing

would be relieved through a staggered roof profile ranging from seven to ten storeys, with the tallest part of the building adjacent to John Lewis, and a combination of materials.

- 4.7 A roof terrace and communal lounge are proposed on the eighth floor, overlooking but set-back from Longbrook Street. The windows on the rear elevation close to John Lewis would be angled away from that building to provide an acceptable outlook.
- 4.8 A varied materials palette is proposed, which would respond to the materials present in the locality and provide visual relief and interest.
- 4.9 For more detailed information on the design of the scheme, please refer to the submitted Design and Access Statement by Grainge Architects.

5. PLANNING POLICY FRAMEWORK

PLANNING OVERVIEW

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires proposals for development to be considered in accordance with the policy context of the adopted Development Plan and any other relevant material considerations.

THE DEVELOPMENT PLAN

- 5.2 The Development Plan in this case comprises:
- The Core Strategy Development Plan Document, adopted 21 February 2012; and
 - The Exeter Local Plan First Review 1995-2001 (Saved Policies), adopted 31 March 2005.
- 5.3 The key policies related to this proposal are identified below and analysed where appropriate in the Planning Analysis chapter of this statement.

Core Strategy

- Policy CP1 (Spatial Strategy)
- Policy CP2 (Employment)
- Policy CP4 (Residential Density)
- Policy CP5 (Housing Need)
- Policy CP8 (Retail)
- Policy CP9 (Transport)
- Policy CP13 (Decentralised Energy Networks)
- Policy CP14 (Renewable and Low Carbon Energy)
- Policy CP15 (Sustainable Construction)
- Policy CP17 (Design and Local Distinctiveness)
- Policy CP18 (Infrastructure)

Longbrook Street, Exeter Planning Statement

Exeter Local Plan First Review

- Policy H1 (Search Sequence)
- Policy H2 (Location Priorities)
- Policy H5 (Diversity of Housing)
- Policy S1 (Retail Proposals/Sequential Approach)
- Policy C5 (Archaeology)
- Policy S3 (Shopping Frontages)
- Policy S5 (Food and Drink)
- Policy T1 (Hierarchy of Modes)
- Policy T2 (Accessibility Criteria)
- Policy T3 (Encouraging Use of Sustainable Modes)
- Policy T10 (Car Parking Standards)
- Policy C1 (Conservation Areas)
- Policy DG1 (Objectives of Urban Design)
- Policy DG4 (Residential Layout and Amenity)
- Policy DG7 (Crime Prevention and Safety)
- Policy EN2 (Contaminated Land)

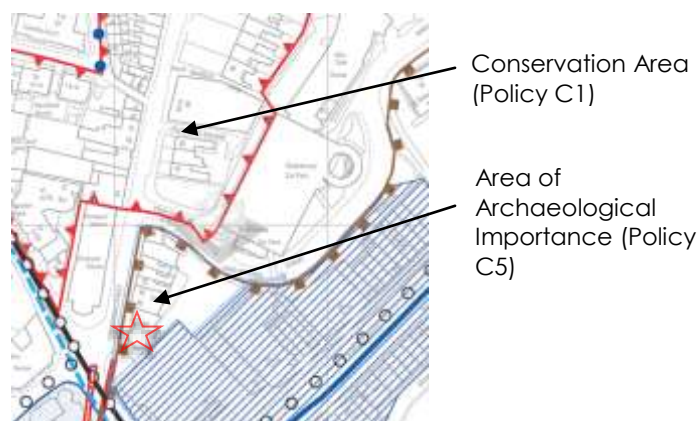
Local Plan Proposals Maps Extracts

- 5.4 The site is located outside the Primary and Secondary Shopping Areas and the Longbrook Conservation Area. It is inside an Area of Archaeological Importance and the Housing Core Area.

City Centre Shopping Inset Map



City Centre Inset Map



PERTINENT MATERIAL CONSIDERATIONS

The National Planning Policy Framework

- 5.5 The National Planning Policy Framework (NPPF), introduced in March 2012, and its associated guidance (National Planning Policy Guidance), are significant material considerations in planning decisions.
- 5.6 The NPPF makes it clear that planning decisions for housing that comply with the Development Plan should be made within the context of the presumption in favour of sustainable development, and “without delay.”
- 5.7 The NPPF places significant weight on the need to support economic growth through the planning system and the provision of new homes, particularly where this involves the efficient use of land, and in particular, previously developed land.
- 5.8 The NPPF seeks to protect and enhance the vitality of town centres, and states at Paragraph 23 that Local Planning Authorities should “...recognise that residential development can play an important role in ensuring the vitality of town centres...”
- 5.9 A core principle of the NPPF is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.” (Paragraph 17, bullet 11).
- 5.10 There is strong emphasis on maximising the use of previously developed land at accessible locations, provided it is not of high environmental value (Paragraph 111), and Local Planning Authorities are required to “boost significantly” the supply of housing.
- 5.11 The term ‘high environmental value’ covers heritage assets. The NPPF acknowledges the importance of heritage assets, which are an irreplaceable resource, and requires them to be conserved in a manner appropriate to their significance, with great weight given to the asset's conservation. It requires the significance of any heritage assets affected by proposals, including any contribution made by their setting, to be considered in planning decisions

(Paragraph 126). It also requires consideration to be given to the desirability of sustaining and enhancing the significance of heritage assets and new development making a positive contribution to local character or distinctiveness (Paragraph 131).

5.12 The NPPF advises that new development within Conservation Areas should enhance or better reveal their significance, and that schemes which “preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably” (Paragraph 137). It also requires consideration to be given to the desirability of sustaining and enhancing the significance of heritage assets and new development making a positive contribution to local character or distinctiveness (Paragraph 131).

5.13 The NPPF advises that Local Planning Authorities should “approach decision-taking in a positive way to foster the delivery of sustainable development.” (Paragraph 186). It also advises that Local Planning Authorities should “look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local Planning Authorities should work proactively with applicants to secure developments that improve the economic, social, and environmental conditions of the area.” (Paragraph 187).

St James Neighbourhood Plan

5.14 The St James Neighbourhood Plan (NP) was adopted in March 2013. The application site is located to the extreme south of the NP area (see extract map, below).

5.15 The NP sets out the community's aspirations for future development in order to address existing issues and to create a balanced and vibrant community.

5.16 It identifies that 52.8% of the ward's residents are aged between 19-25, compared to around 10% in other locations (2011 Census). However, it also states that “*Due to its proximity to the University student residents will always be a key part of the community of St James and will help to give it its distinct character and vitality. The*

Longbrook Street, Exeter Planning Statement

ward will continue to be an attractive place for students to live as a valued and integrated part of a balanced and sustainable community. A significant number of students decide to stay in Exeter once they have completed their studies with real benefits to the local economy. St James should provide opportunities for students entering employment or post graduate education to continue to live within the ward."(Page 11).

- 5.17 The NP sets out a number of priorities, including "working with the Council and University to manage any adverse impacts that arise from the high level of student accommodation within the ward." (Page 15). The NP identifies that some streets in the ward have a large concentration of student accommodation, which "has a significant impact on both permanent and student resident alike" (Page 15) but the NP acknowledges that "many of the impacts are no fault of the student residents". Problems include a decline in urban quality as a result of a lack of property maintenance and unsightly waste storage and litter. Provision of sufficient refuse storage is identified as an important requirement of good design (Page 24).



Supplementary Planning Guidance

5.18 Supplementary Planning Documents (SPDs) provide further guidance on how planning policies should be applied, and are material considerations in planning decisions.

5.19 The following SPDs have been considered and are addressed in the Planning Analysis chapter, where appropriate.

- Residential Design SPD (September 2014);
- Sustainable Transport SPD (March 2013).

Emerging Planning Policy

5.20 The Council has consulted on the Development Delivery Development Plan Document (July 2015). This has not yet been submitted for examination and as such, its policies carry limited weight. Once adopted, the DPD will replace the Local Plan First Review.

6. PLANNING ANALYSIS

KEY ISSUE 1: LAND USE PRINCIPLES

6.1 A key proposal for the City Centre set out in the Core Strategy (Paragraph 14.2) is to “maintain and enhance” its vitality. The expansion of the quality and quantity of retail, leisure, entertainment, amenity uses, and housing, are all key to this.

6.2 The land use principles relevant to the proposal, are:

- Is the creation of additional student housing in this location acceptable?
- Are town centre uses, including retail/food and drink, appropriate in this location?

Student Housing

6.3 There is strong national and local support (Policies H1 and H2) for housing on previously developed sites in urban areas, as well as on upper floors in town centres. It is pertinent that the application site is located in the Housing Core Area (Policy H2 refers).

6.4 The Core Strategy states, at Paragraph 6.28, that “the continuing growth of the University of Exeter is important to the future prosperity of the city”. Student numbers increase year on year and statistics on the University of Exeter’s website¹ reveal that the 2020 target of 20,000 students set out in its Strategic Plan dated 2015 has already been exceeded, with 22,085 students recorded for the 2016/17 academic year.

6.5 The Core Strategy recognises that the provision of purpose built student housing can relieve the pressure on family housing and that if sustainably located near town centres and the University campuses, and largely away from residential areas, there is less potential for harm to the character and amenity of an area. It is pertinent that the University aspires to accommodate 75% of new students in purpose built housing, as identified in the adopted Core Strategy.

¹ <http://www.exeter.ac.uk/spc/stratplan/studentnumbers/>

- 6.6 Policy CP5 requires housing supply to meet the needs of all sectors of the community, including students. Saved Local Plan Policy H5 permits student housing provided that it reduces the need to travel by car, and would not harm the amenity of the locality or neighbours; or result in on-street parking problems or an over-concentration, to the detriment of the character of the locality. Emerging Policy DD12 has similar requirements.
- 6.7 Part of the site has extant planning consent for student housing therefore the land use principle is established. The extant consent has established the baseline conditions for the site and constitutes a fall-back position. The key issue in this case is whether additional bedspaces at this location is acceptable.
- 6.8 St James NP Policy C2 supports large-scale purpose built student accommodation in areas where it can be properly integrated into the urban area without harm to (a) the character of a residential area; (b) residential amenity by virtue of servicing and parking; and (c) visual amenity through a building scale and massing that is out of character with surrounding buildings.
- 6.9 The application site is highly suited to student housing by virtue of its city centre location, surrounded by a diverse range of town centre uses, and with good accessibility to both the University and Exeter Central (train station). There is a strong student presence in the locality and the applicant is aware of at least one other proposal for student housing in the area (at Sidwell Street). However, it is not considered that increased student numbers in this town centre location as a result of a more intense scheme would result in an over-concentration to the detriment of other land uses or the general amenity or ambiance of the city centre. There are residential properties nearby, including to the northern end of Longbrook Street, however these are generally sited further out from the shopping centre, and would be unlikely therefore to be adversely impacted by additional student accommodation.
- 6.10 The scheme proposes nil car parking due to its highly accessible location and it is anticipated that the same obligations that were secured for the extant consent with respect to student car parking and management of arrivals and departures at the

beginning and end of term would be offered and secured for this proposal. Consequently, the proposal would not generate a demand for on-street car parking in the area and as such, there would be no demonstrable harm to highway safety or amenity.

- 6.11 Adequate provision is made for refuse/recycling storage, which would be serviced from the rear, and consequently the proposal is unlikely to result in any harm to the visual amenity of the area, or impede the free flow of traffic through congestion caused by refuse collection vehicles servicing premises from the highway.
- 6.12 A tall building has been approved on this site, which is surrounded by tall buildings, and the staggered roof profile would make an appropriate transition from the lower building heights on Longbrook Street to the larger and more imposing buildings, including John Lewis, at the cross road junction. The design merits of the scheme are however, discussed in more detail later.
- 6.13 In conclusion on this issue, the principle of additional student housing on this site is appropriate and in accordance with Core Strategy Policy CP5; Saved Local Plan Policies H1, H2 and H5 and Neighbourhood Plan Policy C5.

Town Centre Uses

- 6.14 Policy CP8 proposes around 3,000 sq m of net retail convenience floorspace and around 37,000 sq m of comparison floorspace in the city centre.
- 6.15 Consistent with national policy, Saved Local Plan Policy S1 sets out a sequential approach to the location of retail uses. New retail floorspace at edge of centre locations which are functionally or physically linked to the primary shopping area will be supported provided it does not detract from the vitality and viability of the shopping centre.
- 6.16 Saved Policy S5 supports food and drink uses within the city centre provided there would be no unacceptable impact upon amenity through noise, smell, litter or late-night activity, or an increase in the potential for crime and public disorder.

- 6.17 The submitted scheme includes both an A1 retail and A3/A4 food and drink use on the ground floor. These town centre uses would deliver an active frontage, consistent with the Core Strategy's aim to maintain vitality within the city centre.
- 6.18 The site is located just outside the primary shopping area and opposite the secondary shopping area, and consequently would have a strong link to the retail heart of the city centre. It is not considered that a retail unit in this location would undermine the retail function, vitality or viability of the main shopping areas.
- 6.19 The proposed food and drink use would be sited in the same location as the existing public house and the principle of such a use is thus established. The only material change would be delivery of more modern, attractive accommodation, which would meet current market expectations, with resulting benefits for the visual amenity of the area and local economy.
- 6.20 As a result of the above considerations, the proposed town centre uses are considered to be appropriate and in accordance with Policies S1, S5 and C8.

KEY ISSUE 2: DESIGN & CONTEXT

- 6.21 The need for high quality design, responsive to the local context, is enshrined in planning policy at all levels. Development Plan Policies DG1 and DG4, and D1 of the St James Neighbourhood Plan, set out a range of design criteria and this has been considered in the design of the scheme.
- 6.22 The rationale for the design and architectural appearance of the scheme is set out in detail in the submitted Design and Access Statement and so is not repeated here.
- 6.23 In summary however, it is considered that the existing site detracts from the character and appearance of this regenerated part of the town centre. The vacant site makes no contribution to the vitality or vibrancy of the shopping centre and the design, scale, height, and overall appearance of the adjacent 1960's pub appears incongruous alongside its taller, larger and generally attractive neighbours. The replacement of both sites should be regarded as a priority.

- 6.24 The siting of the building would respect existing building lines, and its proposed height, scale and massing is deemed to be highly appropriate for the city centre location, surrounded by tall buildings and adjacent to the tallest building in the city. The building's overall scale and mass is relieved through three visually distinct components of staggered height, which responds to the local topography and the differing heights of the adjoining and neighbouring buildings. It is also pertinent that the Design Review Panel supported the approach, which they considered would "represent an improvement of the existing situation."
- 6.25 The proposed 'active' uses on the ground floor, with large glazed shopfronts, would respond positively to the site's town centre location, contributing to activity and enhancing the vitality of the area.
- 6.26 The proposed palette of materials is considered appropriate for the locality, and would help to deliver a high-quality development that sits well in the street-scene and wider townscape.
- 6.27 The proposed roof terrace would provide usable outdoor amenity space for the proposed students, at a height that would not result in an adverse impact on neighbouring amenity. Soft landscaping at the edge of the terrace would be visible from the public realm at street level, below, adding further visual interest and creating a soft edge/profile at roof level.
- 6.28 All bedspaces/units would benefit from an acceptable outlook, achieved on the rear through oriel windows angled away from the closest neighbouring building (John Lewis), and with acceptable provision in terms of space and communal facilities. A communal lounge is proposed, which would provide additional space for socialising.
- 6.29 The proposed development would provide increased activity and surveillance in the area, as a result of comings and goings at street level and passive surveillance from the upper floors. The rear servicing areas would be overlooked. Consequently it is considered that the proposal would improve on general security/safety in the immediate area.

6.30 In conclusion, it is considered that the proposed design of the scheme would significantly improve the character and appearance of the immediate context, delivering a high-quality development that responds appropriately to the character and appearance of the area. As such, the scheme would accord with the requirements of Policies CP17, DG1, DG4 and DG7.

6.31 Sustainable design and construction measures are addressed later in this chapter.

KEY ISSUE 3: LAND USE EFFICIENCY

6.32 The re-use of previously developed land is a national priority, and its effective re-use, provided it is not of high environmental value, is a core planning principle of the NPPF. There is a strong national commitment to this, most recently demonstrated by the Government's requirement for Local Planning Authorities to hold a register of previously developed land and the introduction of a relaxed planning regime for schemes on registered sites.

6.33 The Core Strategy priorities the re-use of previously developed sites, and Policy CP4 requires residential development to “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.”

6.34 The current proposal would deliver a high density of development, which would make a highly efficient use of previously developed land, suitable for the dense urban grain of development of the area.

KEY ISSUE 4: HERITAGE IMPACT

6.35 Core Strategy Policy C1 and Policy H1 of the St James NP both endorse the statutory requirement for development to conserve and enhance heritage assets and their settings.

6.36 The application site is located in a designated area of Archaeological Importance and outside a Conservation Area, but would be visible from the Longbrook Conservation Area. There is also a historic wall (non-designated) to the rear of the site, believed to date from the 14th or 15th Century.

- 6.37 There are multiple listed buildings on Longbrook Street. The closest to the site are no. 23 Longbrook Street; Hampton Place and the Black Horse Inn; all Grade II. The proposed development would be visually separated from these historic buildings by other buildings and although the development would be visible from them, it would be surrounded by other tall buildings and as such, it is unlikely that there would be any harm to their settings.
- 6.38 A tall building has been approved for part of the site and there are many tall buildings surrounding it. Consequently it is not considered that the proposed building, by virtue of its scale, height or mass, would appear incongruous when viewed from the Longbrook Street Conservation Area. The proposed palette of materials is also appropriate for the context. As such, there would be no harm to the character or appearance of the Longbrook Street Conservation Area.
- 6.39 The historic wall, which represents a historic property boundary, is thick in depth and constrains the layout of any redevelopment of the long-term vacant site. The extant scheme proposed retention of the historic wall but a breach to accommodate a single escape door opening. The submitted application also retains the wall but proposes an additional opening to accommodate access to the bike store and commercial unit (rear). The wall has been unsympathetically repaired over the years and it is proposed to re-use removed, historic material from the creation of the new openings to restore and improve the wall. The historic significance and character of the wall would not therefore be adversely affected the proposed works, which is necessary in order to accommodate the development. If required, a Method Statement could be secured by condition to ensure that there is no harm to retained fabric or the structure of the wall and the finished result is acceptable, in heritage terms.
- 6.40 An archaeological evaluation of no's. 30-32 was undertaken in 1994 by Exeter University, prior to demolition. This revealed that the site was terraced to a depth of at least 0.5m in the 19th Century, which is likely to have removed archaeological deposits. The extant consent is subject to a condition (no. 6) which requires submission and approval of a written scheme of archaeological work prior to any

development. It is considered that this approach continues to be appropriate and the current application could be subject to the same condition.

- 6.41 In summary, the proposal would deliver heritage gain through the redevelopment of a site visible from a Conservation Area, which detracts from the visual amenities of the locality. The proposal also presents the opportunity to secure the long-term protection of a non-designated heritage asset (the historic wall) through incorporating it into the design of the building, which otherwise could fall into disrepair through neglect. There are thus public benefits associated with the proposal, which would weigh any harm associated with partial loss of historic fabric.
- 6.42 There would be no harm to the setting of any neighbouring listed buildings and the potential for below-ground archaeology, which is deemed to be limited, could be satisfactorily dealt with by a condition to secure archaeological work. As such, the proposal would comply with the statutory and policy requirements relating to heritage assets.

KEY ISSUE 5: ACCESS & PARKING

- 6.43 The Core Strategy supports nil car parking at accessible locations, where appropriate. It states:

“Within the core area of the City Centre (see Plan 1), where shopping, employment, and other facilities are within easy walking distance, developers may consider the option of providing housing without off street parking. The experience of recent car free schemes in the City Centre, which have involved the conversion and extension of existing buildings, suggests that few parking difficulties will arise provided that opportunities to park elsewhere are limited by on-street parking restrictions. Occupiers will be excluded from residents parking schemes and should be made aware of the parking limitations before purchase.”
(Paragraph 4.8).

- 6.44 Policy CP9 advises that demand management measures and improvements for pedestrians and cyclists will be used as “strategic transport measures to

accommodate the additional development proposed for the city and adjoining areas."

- 6.45 Policies T1-T3 inclusive are consistent with the national objective of locating development where the need to travel is minimised. Development proposals should maximise opportunities for sustainable modes of transport, and be sited within walking distance of shops, services, and public transport. Convenient, secure cycle parking consistent with the adopted standard should be provided and provision should be made for people with disabilities.
- 6.46 The application site is highly sustainably located in terms of its accessibility to shops and services by walking, cycling and public transport, and the town centre location within walking distance of the University would render a car unnecessary for the proposed students. Consequently, no provision is made for off-street car parking (which is, in any event, consistent with the emerging Development Plan, which states at paragraph 5.21 that "car free residential developments will be encouraged within the city centre....").
- 6.47 The extant approval is subject to a legal agreement, which restricts the occupation of the accommodation to students and secured various parking and demand management related measures (see Appendix A), including (inter alia) restricting car use by students and preventing applications for parking permits. The applicant would be willing to offer these commitments through a new legal agreement in support of this application.
- 6.48 The scheme proposes 20no. cycle parking spaces for the proposed student accommodation. This is deemed to be appropriate provision on the basis that cycle storage use by students in schemes such as this is consistently low, with storage facilities significantly underused.
- 6.49 In conclusion, the site is highly sustainable in terms of its accessibility to shops and services, by non-car modes. The site is also within walking distance of the University campus or there are bus services that link the site to the University. Provision is made

for secure cycle parking. The absence of off-street car parking to serve the development is therefore acceptable.

KEY ISSUE 6: CONTAMINATION

- 6.50 No's. 30-32 was historically used for car repairs. A site investigation was undertaken prior to the determination of the extant scheme, which revealed an area with elevated levels of petroleum hydrocarbons; a disused underground fuel storage tank; and disused fuel/pipe lines. Accordingly, a remediation strategy was prepared and a condition was imposed on the approval (no. 5), which required remediation of the site consistent with the approved strategy.
- 6.51 As this scheme includes another site, it may be necessary for a further ground investigation to be undertaken following demolition and a revised remediation strategy to be prepared, to cover both sites. This can be secured by condition.
- 6.52 Provided the site is remediated, the proposal would comply with Policy EN2.

KEY ISSUE 7: SUSTAINABLE DESIGN AND CONSTRUCTION

- 6.53 Policy CP13 requires new development with a floorspace of at least 1,000sqm to connect to an existing, or proposed, decentralised energy network, and where it can be demonstrated that this is not viable or feasible, alternative solutions that would achieve the same or better carbon reduction must be proposed and implemented. Policy CP14 requires new development to use decentralised and renewable or low carbon energy sources to reduce predicted CO2 emissions by the equivalent of at least 10% over and above the building regulations at the time of building regulations approval. Policy CP15 requires proposals to demonstrate how sustainable design and construction measures have been incorporated into the scheme.
- 6.54 A Sustainability and Energy Statement will be prepared and submitted during the application process to demonstrate compliance with these policies.

7. PLANNING OBLIGATIONS & CIL

Planning Obligations

- 7.1 The purpose of a planning obligation is to mitigate the impacts of a development. The NPPF requires planning obligations to be necessary to make the development acceptable in planning terms; directly related to the proposed development; and fairly and reasonably related in scale and kind.
- 7.2 Policy CP18 relates to planning obligations and infrastructure. It states:
- “Developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development. Contributions will be used to mitigate the adverse impacts of development (including any cumulative impact). Where appropriate, contributions will be used to facilitate the infrastructure needed to support sustainable development.”
- 7.3 Planning obligations relating to the occupation of the student accommodation and parking/demand management measures were secured for the previous scheme (see Appendix A) and the applicant anticipates that the same obligations would be required to support this scheme.
- 7.4 The scheme is not liable for affordable housing on the basis that the proposed land use is sui-generis not C3.
- 7.5 Any other requests for planning obligations to mitigate the impacts of the scheme would be considered and negotiated during the application process.

CIL

- 7.6 The Planning Act 2008 provides the framework for a discretionary planning charge known as the Community Infrastructure Levy (CIL), the detail of which is set out in the Community Infrastructure Levy Regulations 2010 (CIL Regulations).

Longbrook Street, Exeter
Planning Statement

- 7.7 The Council has introduced CIL and the proposed development will be liable for CIL in accordance with the Charging Schedule. A CIL Question Form supports this application.

8. PLANNING BALANCE/CONCLUSIONS

- 8.1 The application site is previously developed land in a highly sustainable, city centre location. Its redevelopment is therefore consistent with the national objective of making efficient use of previously developed sites at sustainable locations.
- 8.2 The vacant site and existing pub detract from the character and appearance of the area, and appear at odds with the scale, height and massing of the surrounding buildings. The local area has seen change through urban renewal and the regeneration of this site should be regarded as a priority.
- 8.3 Part of the site has extant planning consent for town centre uses on the ground floor with student accommodation above, in a tall building. This has established the baseline conditions for the site and represents a reasonable fall-back.
- 8.4 The larger site is considered to be highly suited to the proposed high-density, mixed use development incorporating town centre and residential uses, by virtue of its city centre location and proximity to tall buildings, namely John Lewis and the four tall buildings at the Longbrook Street/Bailey Street/Paris Street/New North Road junction.
- 8.5 The proposed development would deliver a high quality development, which assimilates well within the street-scene and wider townscape. There would be no unacceptable loss of historic fabric and the proposal would not harm the setting of any listed buildings or the character or appearance of the neighbouring Conservation Area.
- 8.6 A high standard of amenity would be provided for future residents of the scheme, with adequate provision for refuse/recycling storage for all three uses.
- 8.7 The potential for archaeological material or contamination to be present on the wider site can be dealt with through appropriate conditions, consistent with the approach for the extant approval.
- 8.8 The proposal is therefore acceptable and policy compliant. Accordingly, there is a Section 38(6) presumption in favour of approval.