

National Planning Casework Unit
5 St Philips Place
Colmore Row
Birmingham
B3 2PW

13 December 2020.

Dear Mr Sirs

Exeter City Council Planning Application:

19/1556/FUL | Development of two blocks with Co-Living bed spaces (Sui Generis) and hotel (Class C1) including bar and restaurant, following demolition of existing shopping centre and pedestrian bridge, change of use of upper floors of 21-22 Queen Street to Co-Living (Sui Generis).

The Harlequin Centre, Paul Street, Exeter Devon EX4 3TT

Exeter Civic Society is writing to ask the Secretary of State to review the decision that Exeter City Council's Planning Committee gave to approve in principle this development (subject to agreeing conditions between officers and the applicant) without fully considering the impact upon local heritage at their meeting of 26 October 2020.

It is our view that councillors failed to consider and recognise fully the impact this development will have upon heritage and listed buildings, including the city's Roman Wall (a listed National Monument), when resolving to approve the planning application.

The Society objected to these proposals when first submitted on the grounds of their being too high, and that the mass is out of scale with existing buildings in the City Centre Conservation Area, and the impact upon buildings in the adjoining St David's Conservation Area. Despite the applicant slightly reducing the height of the proposals through two subsequent changes/amendments, it is still our opinion that they remain too high and the mass is too great for this sensitive location in the centre of the city. I attach our three letters of objection which describe our position in more detail.

The planning meeting was dedicated to this one application; the officer's verbal report took one hour to deliver, but most of the initial questioning by councillors related to the proposals for co-living (which the developer proposes as a Su Generis category) rather than the impact of the proposals on Heritage. The provision of a Hotel, a significant part of the proposals, did not generate any discussion. When councillors moved on to debate the application their focus was also on the quality of the co-living accommodation and the city's lack of a 5 year housing land supply. Indeed, the lack of a 5 year housing supply was the primary reason for granting approval to this development, rather than the impact this development will have upon local heritage. We find it outrageous that councillors spent very little time discussing the critical impact this development will have on heritage in the city.

We consider the government's requirement for a 5 year housing supply in all planning authority areas is having a negative impact upon councils' decision making because one of their primary concerns has become losing planning application appeals when applications are refused and there is not a local 5 year housing supply. Exeter is a small city that has seen most of its developable land built on out to its boundary with neighbouring authorities, so the availability of house building land is compromised.

At the planning committee meeting there were few comments made by councillors about the size and scale of the proposals, or the impact they will have upon the local heritage, but in the context of the 1.5 hours of debate, this was insignificant compared to the debate about the co-living accommodation. It is our assertion that the visual impact of new buildings on listed buildings in a conservation area, particular when they are juxtaposition, is a paramount consideration, rather than the internal use. The use of buildings can and will change over the lifetime of a building, as we have seen in many parts of the city, including in conservation areas.

We also wish you to review the council's misjudged decision to accept the proposals for co-living accommodation which we believe to be well below the size and standard suitable to be an acceptable home. The size of living spaces is the same as those at consultation stage for this development when student accommodation was proposed. Accommodation for students is only short term, with students normally returning to their family homes at the end of each semester. In addition, they are likely to have similar interests so are inclined to spend time together socialising. This is less likely to be the case for people looking for a home, whether short or long term, and will presumably need to be in employment to be able to afford the rent and service charges. It can be expected that tenants will come from a range of employment sectors, and be of varying ages, and have much less in common than students of a similar ages.

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Because of the lack of consideration of Heritage Assets and the city wall by councillors, we ask you to quash this approval and ask the council to review their decision.

If the decision is quashed, it is our hope that councillors and officers will negotiate with the developer to make changes to this application to ensure its scale and mass is more in-keeping for this sensitive location and to ensure its impact upon the city's heritage is reduced.

Yours sincerely

Keith Lewis, Vice chairman

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