



UNION 4 PLANNING

Welbeck CP (Haven Road) Ltd

Haven Banks, Exeter, EX2 8BY

Comprehensive redevelopment to deliver a new, mixed use neighbourhood, comprising demolition of existing buildings and construction of four residential-led mixed-use buildings of 2 to 6 storeys, including retail, café/restaurant and flexible commercial units (Class E) residential (Class C3) and co-living (Sui Generis) accommodation, pedestrian square and public realm, amenity areas, landscaping, access, parking, servicing and associated works.

PLANNING STATEMENT

July 2022



UNION4
PLANNING

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by Union4 on behalf of Welbeck CP (Haven Road) Ltd. It describes proposals for the redevelopment and regeneration of the Haven Banks Retail Park, in central Exeter. The scheme proposed is comprehensive in nature and based on Liveable Exeter principles, connecting wider regeneration areas to the southeast with the town and acting as a catalyst to the broader redevelopment of this part of Exeter. As such, it should be viewed as one of the first phases delivering the wider regeneration of the Water Lane area.
- 1.2 It is a bold vision that aims to deliver a new, dynamic, mixed-use neighbourhood, with a range of residential, retail, café/restaurant and other uses together with new, pedestrian focussed public realm. The scheme has evolved through thorough consultation with Exeter City Council (ECC), Devon County Council (DCC), the Environment Agency (EA), the Design Review Panel (DRP) and interested local stakeholders, Members and residents, through an extensive public consultation exercise. The resulting proposals put forward have positively address the comments received, as set out in more detail at section 4 and 6.
- 1.3 The proposals involve demolition of the existing predominantly vacant retail and leisure buildings and their redevelopment to provide a mixed-use scheme comprised of 4 buildings ranging in height from 2 to 6 storeys. The buildings proposed include a mix of active frontage uses at ground floor including restaurant, retail and other flexible commercial space as well as residential and supporting amenity uses.
- 1.4 The development proposes a mix of 246 purpose built Build to Rent (BTR) homes (Class C3) and 188 co-living homes (sui generis), together with a wide range of supporting amenities.
- 1.5 This Planning Statement should be read in conjunction with the accompanying application plans. Design and Statement and all other supporting technical reports, the scope of which were agreed through pre application discussions with ECC.

The Applicant

- 1.6 Welbeck CP (Haven Road) Ltd is a family owned, private property development and investment business. They are the Applicant and owner of the site, having acquired the freehold interest in 2021.
- 1.7 Originally incorporated in 1928 to operate cinemas in the Newcastle upon Tyne area, today, Welbeck CP owns and manages a wide retail property portfolio. It has a focus on using its expertise to acquire and manage retail assets that have further potential and where appropriate, pursue redevelopment options that can provide regeneration opportunities.

Structure of this Pre-Application Planning Statement

- 1.8 The subsequent sections of this Planning Statement are set out as follows:

- Section 2 provides an overview of the application site including location, description, site allocations and planning history;
- Section 3 sets out details of the proposed development;
- Section 4 summarises the various pre-application advice received;
- Section 5 sets out the policy context relevant to the proposals;
- Section 6 outlines the key planning and environmental considerations;
- Section 7 provides a summary and conclusions.

2.0 Site Location and Description

- 2.1 The application site ('the site') is located in the St Thomas Ward in the area known as Haven Banks and lies on the east side of Water Lane. It occupies a strategic position at the start of the wider Water Lane area, which extends eastwards, to the south of the Exeter Ship Canal.
- 2.2 The site and immediate surroundings have been through a number of transformations in the past 140 years, from allotments, to the development of the main electricity generating station for Exeter in around 1900, with associated yards, gantry and infrastructure, allied to the major rail freight infrastructure that grew around the former Basin Branch that served the timber yards and industries that developed south of the Canal. At the time the area contained traditional industries together with a mix of workers cottages, often in the form of terraced housing much of which remains today.
- 2.3 The Site was redeveloped in the 1980's to reflect largely the current form and comprises a large retail warehouse unit known as the Haven Banks Retail Park, divided into two large retail warehouse outlets and a bowling alley, 'Tenpin'. The power station was reduced in scale and the frontage to Haven Road, outside of the application site boundary, is now formed and repurposed as the Quay Climbing Centre, climbing gym and a sub-station.
- 2.4 The history and current uses are illustrated in more detail in the accompanying Design and Access Statement.
- 2.5 The 2 retail units are no longer trading and both are vacant. The site lacks the footfall and vibrancy necessary to support the uses long term. The bowling alley is nearing the end of its lease and is in discussions to relocate to a more suitable location within Exeter.
- 2.6 The northern part of the site contains a car park which is accessed via Water Lane to the south, with an additional exit onto Haven Road to the north. To the south of the retail units is a service yard and HGV access.

Figure 1: Site Location (boundary approximate)



Source: Google Maps (2021)

- 2.7 The site is bound to the northwest and southeast by residential properties, to the northeast by a mixed-use building comprising the aforementioned climbing centre and café, and to the southwest by Water Lane. Directly opposite the site on Water Lane are commercial/industrial units and neighbouring residential areas. The River Exe is approximately 130m to the north and east. Exeter Town Centre is located on the opposite side of the River Exe approximately 600m to the north (as the crow flies).
- 2.8 The site is within close proximity to Exeter St Thomas Railway Station which is located approximately 600m to the northwest and is served by Great Western Railway. There are bus stops directly adjacent to the site on Water Lane served by the Green Park & Ride bus. There are also routes via Exeter City buses at Riverside Leisure Centre, some 400m to the northwest of the site and a significant number of additional bus routes from Exeter St Thomas Railway Station.
- 2.9 The Riverside Conservation Area abuts the site to the northwest and northeast and generally follows the area along the River Exe between the City Industrial Estate to the south and Exeter Bridge South to the north. It also steps in towards the site to incorporate The Quay climbing centre and café. The extent of the conservation area is shown on the ECC Policies Map extract at figure 3 below, by a dotted red line.
- 2.10 The site lies at the start of Water Lane and is one of the largest potential development opportunities within the wider area, located to the west of the Water Lane regeneration area and closest to the City Centre. Beyond the more recent housing developments of Chandlers Walk and Maritime Court, the area of the former gas works and older industries extends eastwards, sandwiched between the Exeter Ship Canal and mainline railway.

Figure 2: Overview of wider Water Lane regeneration area



Source: Google Maps (2021)

Planning Designations

- 2.11 The site is identified as lying within the urban area but is otherwise undesignated on the Local Plan Policies Map, as detailed in the following extract.

Figure 3: Extract of the Policies Map



Source: Exeter City Council (2015)

- 2.12 The closest listed building is the Grade II Listed 60 Haven Road, 35m to the northeast of the site, however, being on the opposite side of Haven Road, this building is largely screened from view by the climbing centre and café building.
- 2.13 Several trees along the northern boundary and in the car park area are subject to Tree Preservation Orders.
- 2.14 The Electricity Generating House (the Quay Climbing Centre Building) which adjoins the site is locally listed, as are the Fragments and Gateway to No. 62 Haven Road.
- 2.15 The site lies within Flood Zone 3 associated with the River Exe, however flood defence works have recently been completed, which have provided greater protection from flooding to the site and wider Water Lane area. Whilst the updated flood modelling is awaited from the Environment Agency, the scheme has been designed in line with the existing 2011 modelling, therefore is designed to accommodate a worst case scenario event and over and above the likely needs of the update modelling.
- 2.16 The site is not located within an Existing or Potential Employment Area, as defined in the Exeter Employment Land Review 2009. St Thomas District Centre is located approximately 300m to the west and therefore the site is considered to be an edge of centre location.
- 2.17 The Water Lane Regeneration Area is situated immediately southeast of the site, as indicated on the above map extract by a sandy coloured washover. The green hatched area, as shown on the above map extract, to the northeast of Haven Road, is identified as a Biodiversity Enhancement Area.

Planning History

- 2.18 There have been a number of planning applications relating to the use of the site, details of which are set out in the table below.

| Reference | Unit | Description | Decision |
|-------------|------|---|-------------------------------|
| 19/0434/FUL | 1 | Change of use from retail (A1 Use Class) to a Family Entertainment Centre including trampoline park, soft play, mini-golf and café, and storage and distribution warehouse (mixed D2/B8 Use Class), with flexibility to change back to a retail warehouse (A1 Use Class). | Withdrawn |
| 17/0413/FUL | 2 | Change of use of retail warehouse (Use Class A1) to flexible use as either a gym (Use Class D2) or retail warehouse (Use Class A1) with a non-material amendment to condition e of pp. 03/84/1493 to account for the additional goods that can lawfully be sold from Unit 2 (appeal ref. T/APP/Y1110/X/03/1126223), mezzanine extension and installation of new entrance. | Granted 2 November 2017 |

| | | | |
|-------------|-------|---|------------------------------|
| 03/0346/LED | 2 | Use for the retail sale to registered members of clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and ancillary items. (Certificate of Lawfulness of Existing Use) under section 191 (1) (c) Town and Country Planning Act | Refused 16 July 2003 |
| 02/1795/FUL | 2 | Retention of retail warehouse use (application 03/84/1493 granted 19 March 1985) | Withdrawn 14 May 2003 |
| 99/0876/FUL | 2 | Retention of existing use to allow retail sale to registered members of clothing, household goods and textiles, shoes, china, glassware and pottery, seasonal goods and ancillary items | Granted 5 September 2000 |
| 00/0207/LPD | 1 | Use of mezzanine floor for retail (Class A1) and cafe (Class A3) (Certificate of Lawfulness of Proposed Use) | Lawful 4 April 2000 |
| 97/0864/FUL | 2 | Variation of existing authorised use to allow (a) retail to registered members, of clothing, household goods and textiles, china/pottery and other ancillary goods (b) the sale of bulky/DIY goods | Refused 29 January 1998 |
| 97/0863/FUL | 2 | Variation of existing planning consent for unrestricted non-food retail use (Class A1) | Refused 29 January 1998 |
| 94/0724/FUL | 1 | Variation of condition (03/84/1493) to allow use of 1,800 sq ft (4.7%) floorspace for wholesale of shoes and clothes (excluding sportswear) | Withdrawn 26 June 1996 |
| 92/0338/TEM | 1 | Temporary change of use from retail to storage and distribution (Class B8 - one year) | Granted 11 June 1992 |
| 91/0258/FUL | 1 | Temporary change of use from retail to storage and distribution (one year) | Granted 22 May 1991 |
| 89/0383/FUL | 3 & 4 | Alterations to proposed ten pin bowling centre | Granted 16 May 1989 |
| 88/0888/FUL | 3 & 4 | Change of use to ten pin bowling and leisure centre | Granted 27 October 1988 |
| 87/0629/FUL | 2 | Change of use to cash and carry warehouse | Granted 30 September 1987 |
| 84/1493/03 | 3 & 4 | Erection of 6,364 sqm of retail warehouse and associated car parking | Granted 19 March 1985 |

Call for Sites

- 2.19 The site was submitted in the Council's Call for Sites exercise which ran from 16 November 2020 to 8 January 2021.
- 2.20 The Council received approximately 80 submissions and are currently assessing the development potential of those sites. The conclusions will be published in a 'Housing and Economic Land Availability Assessment' (HELAA) in due course and the results of the HELAA will inform the sites chosen as possible development sites in a new Local Plan for Exeter.
- 2.21 Notwithstanding this, pre application feedback has already established that the principle of residential led, mixed-use development at the site, is suitable and encouraged.

3.0 Proposed Development

- 3.1 This full application proposes the comprehensive redevelopment and regeneration of the site. It aims to deliver a new, dynamic, mixed-use neighbourhood, with a range of residential, retail, café/restaurant and other flexible commercial uses together with new, pedestrian focussed public realm that connects Piazza Terracina and the riverfront with Water Lane.
- 3.2 The scheme effectively forms one of the first phases in the delivery of the wider regeneration of the Water Lane area, forming part of a vibrant garden community based around sustainable, walkable principles.
- 3.3 The proposals involve demolition of the existing poor quality and unattractive retail and leisure buildings and their redevelopment to provide a mixed-use scheme comprised of 4 buildings ranging in height from 2 to 6 storeys, each of which is broken down into a range of smaller forms.
- 3.4 To activate key spaces, the buildings include a mix of active frontage uses at ground floor including café/restaurant, retail and flexible commercial space as well as residential and supporting amenity uses.
- 3.5 The development proposes a mix of 246 purpose-built Build to Rent (BTR) homes and 188 co-living homes, together with a wide range of supporting amenities and shared communal space.
- 3.6 The proposals form a broadly T-shaped layout, which includes a pedestrian focussed shared surface central route, linking Water Lane and Haven Road, prioritising cycles and pedestrians and incorporating tree planting, landscaping and public square areas.
- 3.7 The main points of access to the site are retained via Water Lane to the southwest and Haven Road to the northeast, with additional secure pedestrian and cycle access points for residents to the east, off the existing cycle path.
- 3.8 The main vehicle access for servicing and parking will be provided to the south along the alignment of the existing access road which runs to the rear of the proposed Building C, providing a total of 32 car parking spaces, including blue badge and car club parking. The existing turning area at the end of this access will also be retained.
- 3.9 A further service access point will be provided off Water Lane, running to the rear of building D, to service that building, providing manoeuvring space and parking for 3 delivery vans. This also utilises an existing turning off Water Lane, located between proposed building D and existing residential units at 10-18 Water Lane.
- 3.10 The new link between Haven Road and Water Lane will be a pedestrian and cycle dominated shared surface. The only vehicles using this route will be emergency vehicles, so it will remain un-trafficked for the majority of the time. The route will gently curve and include landscaping to either side,

narrowing it, minimising hardstanding and making it a less formal and more organic route through the site.

- 3.11 Alongside this central route will be tree planting, areas of lawn and informal and formal playspace provision, activating this central spine and creating a feeling of activity and security as you travel through.
- 3.12 At the end of the central spine route, the site opens up into a public square, with the route continuing to either side, around building B. The route to the east connects to the cycle path and the easternmost core of building C, whilst the route to the west takes you past ground floor commercial units, outdoor seating and onto Haven Road, adjacent Piazza Terracina.

Figure 4: Proposed Site Layout



Source: Piper Whitlock (2022)

Building A

- 3.13 Building A comprises an approximately triangular part 3, part 4 storey building located in the northern corner of the site in an area currently occupied by car parking. The building will comprise two commercial units at ground floor level (Class E) with 22 BTR homes above over ground to third floor levels. The commercial units may be best suited for restaurant use, but the final use can remain flexible within class E as necessary.
- 3.14 The built form of the building steps in away from the site boundaries with every additional storey in order to respect the 2-storey dwellings along Diamond Road and neighbouring properties on Haven Road.
- 3.15 The building has been subject to a significant redesign since the iteration submitted for pre application feedback and public consultation and has evolved to respond positively to the comments raised. The curved frontage onto Haven Road follows the curve of the road, robustly addressing the street scene and infilling a current gap site. Tree planting is proposed at either end of the building, with lower level planting along the rest of the frontage, softening the buildings impact and adding visual amenity.
- 3.16 The SE elevation incorporates a double gable feature on the public square, picking up on the character of buildings in the vicinity and reducing the bulk of development along the SW boundary, adjacent the Diamond Road dwellings.
- 3.17 At ground floor level, 3 homes, a communal garden area and residential bin and bike stores are proposed adjacent to existing residential uses (78 Haven Road) whilst the commercial units are located along the northern site entrance off Haven Road, to encourage activity through the site.
- 3.18 The two ground floor commercial units comprise circa 185sqm and 167sqm of flexible class E floorspace. They will include external seating areas to the south and be served by internal bin stores and plant to the rear. A servicing layby is proposed on Haven Road, providing direct access to the bin stores for both the commercial and residential elements.
- 3.19 The first floor comprises 3 x 2B4P apartments and 7 x 1B2P apartments, with the southernmost stepped in from the SW boundary, away from Diamond Road and following the form of the gable feature. The building also steps in from Diamond Road at the centre of the SW elevation, with eh flat roof below utilised as private amenity space for the first floor apartments. A mansard roof type feature around these terraces screens any views in or out from Diamond Road.
- 3.20 The second floor comprises 1 x 3B6P, 1 x 2B4P and 4 x 1B2P apartments, together with a plant area at the centre of the building. At the SW elevation, the building, and windows serving apartments, are stepped further away from Diamond Road, with a single row of apartments addressing Haven Road. The built form also steps away from the boundary with 78 Haven Road, to the west.

- 3.21 At third floor level, 2 x 1B2P and 1 x 3B6P apartments are proposed, providing unobstructed views north towards the river and city centre. The built forms steps further away again from neighbouring properties on Diamond Road and Haven Road whilst the overall height matches that of the Waterside development on the other side of Haven Road, to the north.
- 3.22 A total of 22 homes are proposed within Building A as follows:
- 13 x 1 Bedroom / 2 Person
 - 1 x 2 Bedroom / 3 Person
 - 5 x 2 Bedroom / 4 Person
 - 1 x 3 Bedroom / 5 Person
 - 2 x 3 Bedroom / 6 Person

Building B

- 3.23 Building B comprises a rectangular building in the north-eastern portion of the site to the rear of the Quay Climbing Centre Building. It will rise to a maximum height of 4 storeys and comprise commercial uses at ground, in the form of a circa 224sqm class E unit at the NW end of the building, with external seating areas to the front and side, onto the areas of public square. Separate refuse storage will be provided for the commercial unit, located to its rear.
- 3.24 Also at ground level, 3 apartments will be located at the other end of the building, on the other side of the central entrance point, provided with private terraces with wrap around the SW and SE elevations of the building. Plant, bin and bike stores will be located to the rear of the building, accessed by a gated passage between the building and the Activity Centre to the NE. A bin collection point is located at the end of the passage nearest the main Haven Road pedestrian entrance.
- 3.25 At first, second and third floor levels, 4 x 1B2P apartments are book-ended by 2 x 2B4P apartments, with an access corridor to the rear and private terraces on the SW elevation, overlooking the public square.
- 3.26 At 4 storeys with a flat roof, the building will rise to below the roof level of the adjacent locally listed Quay Climbing Centre, preserving the existing buildings prominent appearance along Haven Road whilst also retaining light levels to solar installations on its roof. The building has also been stepped further away from The Coolings, when compared with previous iterations.
- 3.27 Whilst respecting the roofline of the Activity Centre, the location of building B will hide the unattractive blank rear elevation of the existing building, activating this south facing elevation onto the public square area. The location of the building also terminates the view along the central

access route through the development, providing an attractive and active vista, drawing pedestrians through the site, towards Haven Road.

- 3.28 Views of Building B from external viewpoints to the north, east and west will generally be limited or non-existent and will ensure that the characteristics and building heights as viewed from, and fronting onto, Haven Road, are maintained.
- 3.29 A total of 21 BTR homes are proposed across building B comprised of the following unit mix:
- 14 x 1 Bedroom / 2 Person
 - 7 x 2 Bedroom / 4 Person

Building C

- 3.30 Building C is an irregularly shaped building proposed along the south-eastern boundary of the site, broadly on the footprint of the existing commercial buildings, but with 'wings' extending at either end. The building will provide the bulk of the BTR homes within the scheme and will include prominently located communal amenity and work space at the main entrance, and at the northern corner, in the form of a residents gym.
- 3.31 The building will be accessed via a main central lobby to the northwest elevation, directly off the central pedestrian route, with a secondary access for residents provided directly into the eastern wing. This secondary access will provide a quieter access point for residents of the apartments towards the eastern side of the site, directly off an area of public square and adjacent to the cycle path.
- 3.32 At ground floor level, homes with frontage terraces will face northwest onto the main through route, bookended at either end by a projecting 3 bed apartment defining the western corner of the building, facing onto Water Lane and a projecting unit incorporating a residents gym, facing onto the central access route and the public square to the north.
- 3.33 Apartments, the central entrance lobby, the residents gym and the secondary access point to the eastern wing ensure continuous active frontage onto all public facing roads/routes through and around the site.
- 3.34 The central entrance point to the building takes the form of a generous double height lobby, leading through to a large open area, providing concierge, parcel room and an extensive residents lounge and shared workspace area. To the rear of this central entrance, glazed elevations and doors lead onto external communal amenity space to the rear of building C.
- 3.35 Corridors run off either side of the internal amenity lounge, providing access to the apartments beyond. Bin and cycle stores are located to the rear of the building, access from the service/parking area off Water Lane and via a spur road to the cycle path to the east.

- 3.36 All ground floor apartments will be provided with private amenity terraces, with a landscaped buffer providing a separation between these and any area of public realm. As a result of flood risk considerations, the floor level of the residential units will be set up below the general site level, providing increased privacy for the private terraces and with landscaping and tree planting softening the transition between the public realm and the raised floor level of the apartments.
- 3.37 To the rear of the building, two generous linked external amenity spaces are provided, connected by a landscaped walkway along the rear of the internal communal amenity area. Further landscaping will screen these areas from the parking provision and provide significant areas of south facing external amenity.
- 3.38 At first floor and above, the access corridor is restricted in the eastern wing to provide access only to apartments in that part of the building, reducing travel distances and increasing a sense of homeliness and security. At the centre of the building, the corridor widens above the entrance lobby, providing a bright, airy space in which to pause and converse with others. Light from this central area will spill into the corridors to either side.
- 3.39 At third floor level, the building steps back, in line with the rest of this central part of the building, stepping away from the Chandlers Walk site to the southeast and further increasing separation distances.
- 3.40 At fourth floor level, the east and west wings step in, reducing the bulk of the building in these areas nearest the site boundaries. A central roof top communal terrace is also proposed at the rear of the building, providing views in a southerly direction above the roofs of neighbouring residential areas.
- 3.41 At the top (fifth) floor level, the building footprint is significantly reduced, providing just 6 apartments to either side of an extensive amenity deck on the roof of the fourth floor below, spanning between the front and rear elevations of the building. The 2 built footprints of the fifth floor are set in from all sides of the development, significantly reducing their visibility as observed from the ground, particularly when passing through or in the vicinity of the site. A small kitchen area and WC are located alongside the amenity terrace.
- 3.42 The building will provide a total of 203 BTR homes comprised of one, two and three bedroom units, as follows:
- 1-Bedroom / 2 Person: 105
 - 2-Bedroom / 4 Person: 63
 - 3-Bedroom / 6 Person: 35

Building D

- 3.43 Building D is located along the north-western boundary of the site and will provide co-living accommodation over 5 storeys, taking the form of 2 buildings linked by a central single storey podium building with amenity deck above. The built forms provides a defined corner at both ends of the building, wrapping around to provide an elevation onto Water Lane to the SW and onto the public square to the NE.
- 3.44 The building will be accessed via a main entrance lobby which is located centrally on the southeast elevation, off the shared surface access route, directly adjacent the residential entrance to Building C.
- 3.45 A total of 188 co-living homes will be provided across ground to fourth floor levels, comprising studio, 1-bed and wheelchair accessible formats. Each unit will comprise a bed space, en-suite bathroom, storage, a small kitchenette and dining/living area. Generously sized communal kitchens will also be provided throughout the building, including washing up and seating areas.
- 3.46 At ground level, the central access point leads onto a concierge desk and a large residents lounge and workspace. Off this central lounge are cinema and meeting rooms.
- 3.47 To either side of the central lounge, co living homes front onto the central pedestrian route through the site, providing active frontage along the whole length of the building. at the western end, these units wrap around to address Water Lane.
- 3.48 At the eastern end of the building, a management suite and commercial unit front onto the public square, providing external seating and active frontage, visible on entry to the site from Haven Road.
- 3.49 Plant rooms, bin and cycle storage, parcel storage and washing facilities for residents are also found at ground level, with cycle access afforded from either end of the building, via a pathway which runs the extent of the building. landscaping and additional tree planting is proposed between the building and the NW boundary, providing screening for the rear gardens of properties fronting Stream Court.
- 3.50 Servicing for building B is achieved via a layby on Water Lane and via a vehicular access off Water Lane, to the rear of the building.
- 3.51 At first floor, 2 communal kitchens and a private dining room open onto the central roof terrace area. The terrace includes screening along the NW boundary to ensure views of properties fronting Stream Court are not afforded.
- 3.52 The remainder of the floor is occupied by co-living homes, accessed off a central corridor. Second floor level continues the same form of development, but without direct access on the amenity

terrace and a slight set back at the rear, central part of the building, stepping the building away from neighbours on this side.

- 3.53 Third floor proposes a further step away from the rear, with three communal terrace areas provided, accessed from the 2 communal kitchen/lounges and a reduction in unit numbers, reducing the depth of the building.
- 3.54 At the top (fourth) floor, the built form is set in away from all elevations of building D. Just 6 units are provided on each side of the central gap and these will be larger, more premium units, given their elevated position. Further communal terraces are found at each end of the building, access via a rear corridor. Kitchen/lounge areas are not proposed at top floor level, given the larger size of the units on this floor (benefitting from larger cooking facilities) and the availability of amply cooking and dining space on the floors below.
- 3.55 Building D comprises 188 co-living units in the following mix:

Overview of Co-living Accommodation

- 3.56 Co-living accommodation is a relatively new and innovative form of housing which provides high-quality studio apartments for rent with an emphasis on high-quality shared facilities and amenity spaces within a fully managed environment.
- 3.57 The market for co-living is well established in other countries and offers a form of independent living for people that would normally rent a studio or room as part of a flat-share or house-share. It suits those who want independence but also wish to be part of a wider community that provides a greater degree of contact, social interaction and inclusion.
- 3.58 Typically, occupiers will include young professionals, key workers in health and other sectors, local people looking for their first independent home, those new to the area or with a local work connection that need a flexible contract. It suits a range of ages and personal backgrounds.
- 3.59 These groups are often unable to afford good quality accommodation on the open market but are essential in developing the economy and provision of key services and thus, the co-living approach provides a solution for those who cannot buy or rent a home. This provides a modern, high quality and professionally managed alternative to HMOs and flat or house shares, potentially freeing up space in traditional family homes.
- 3.60 Individual studio apartments are smaller than self-contained studios in traditional C3 residential schemes, but with co-living they benefit from a much greater provision of shared facilities and amenity spaces that are not available in traditional residential environments.
- 3.61 The combination of private and shared space in typical residential formats in most cases means that the level of space provided is greater within the co-living proposal, than it is with traditional house or flat shares and other forms of accommodation.

- 3.62 Co-living homes are designed to offer an efficient and effective form of accommodation, available at a competitive market rent for prospective tenants, while providing access to a wider range of services and facilities that significantly enhances the quality of accommodation provided and the quality of life for residents. It increases accessibility to high quality homes.
- 3.63 Co-living homes are typically available at lower rental levels than traditional residential studios and house or flat-shares, whilst also providing a number of benefits such as inclusive bills, cleaning, optional house services including linen change, exercise areas, multi-use spaces and cafes. Co-living is designed around an inclusive environment that promotes integration and a strong sense of community.
- 3.64 Co-living schemes offer good value for money and flexibility in terms of tenancy arrangements, providing short and long-term accommodation to suit a range of needs. In addition to providing residential accommodation, they also provide opportunities for work and leisure activities and encourage social experiences through shared spaces and events.
- 3.65 The proposed co-living component aims to create a long-term, sustainable community within the building. The intention is to create an environment where the tenants rent for an extended period of time, to ultimately establish roots locally and settle within the Borough. The proposed development is designed to achieve this vision, with a strong emphasis on communal spaces and social interaction, connecting the work environment at ground level with the residential environment above, forming a single integrated community that also reaches out to the wider community within the area.
- 3.66 The need and demand for co-living accommodation is partly borne out of the difficulties which the wider community experience in the rental and purchase of traditional forms of housing. A significant proportion of prospective residents can no longer afford to rent or buy within the traditional housing market. They are often forced to rely on limited housing choice or rent accommodation in house shares or HMOs, which can vary in both quality and lack proper management.
- 3.67 The co-living accommodation proposed will provide a more innovative form of rental accommodation, with long term, consistent management and a full range of supporting services and facilities which are specifically designed around these needs.

Landscaping/ Playspace

- 3.68 The scheme proposes a significant increase in soft landscaping, around the perimeter and throughout the site.
- 3.69 Both the pedestrian route through the centre of the site and the access road to the parking area are tree-lined, creating a green and welcoming route through the development and screening areas of open space between buildings C and D and to the rear of building C.

- 3.70 Additional tree planting is provided along the SE boundary with Chandlers Walk, and together with a stepping away of building C from the boundary (when compared to the existing building) this area and relationship with residential uses to the SE will be significantly improved.
- 3.71 The frontage onto Water Lane will be planted with a mixture of shrubs and trees, significantly improving this streetscene when compared to the current situation of a predominantly blank brick wall and low level scrubby bushes. Further planting will continue to either side of the 2 access routes into the site. This will provide interest and soften the appearance of the building as viewed from the south, replacing what is currently a fairly stark and uninspiring frontage.
- 3.72 Whilst the proposals necessitate the removal of the majority of trees within the site, these have been agreed as being of a not particularly good quality and the proposals include a significant net gain in tree numbers, post development. This includes a new row of trees along the NW boundary, screening and softening this edge, tree planting and vegetation along the Haven road frontage, creating an attractive corner and strengthening the street scene, and significant numbers of trees within the site, throughout the public square areas. Further landscaping will also soften the easterly elevation onto the cycle path, where there will be a considerable landscaped zone sloping up from the path, to the building.
- 3.73 In terms of hard landscaping, the public square areas will be hard landscaped to provide usable and attractive outdoor space, picking up on design features from the historic use of the site. Materiality will encourage pedestrian priority and a sense of place.
- 3.74 The main through route will gradually rise towards its eastern end, providing a dry escape route between buildings C and D.
- 3.75 To the north, it is proposed to provide a raised table along Haven Road, between the site and Piazza Terracina, slowing traffic and improving pedestrian dominance in this area.

4.0 Pre-Application Feedback and Amendments

- 4.1 Early on in the project, informal pre-application advice was sought from Exeter City Council (ECC) to confirm that the principle of development and overall massing of the scheme was acceptable and to obtain feedback on the proposals. An informal meeting was held on 19 July 2021, at which time the case officer confirmed agreement with a number of key points and identified a number of areas which required further review. These are summarised below.
- 4.2 Overall, redevelopment of the site was supported in principle for a residential-led mixed-use scheme. The feedback was positive and agreed the following points:
- It is agreed that the existing site is of a poor quality and underused;
 - The existing retail use is not protected and residential use (of a range of tenures) is appropriate- ECC will not set a rigid unit mix requirement;
 - ECC would be supportive of extending and enlivening the offer and pedestrian realm around Piazza Terracina, to extend behind the climbing centre;
 - The proposed layout and aim for permeability is supported.
- 4.3 In addition to the positive areas of agreement, the case officer also highlighted a number of matters for review which were factored into the evolution of the scheme and were used to inform subsequent formal pre-application discussions and consultation. A summary of the feedback at that time and associated initial updates to the scheme are set out as follows:
- The location of underground utilities was confirmed and buildings were stepped away from these areas as necessary;
 - Additional views from Colleton Crescent and from low level at the Quayside were added to the analysis to supplement the views initially submitted;
 - 3D views and massing were added to the design pack to better demonstrate relationships between buildings and the surrounding context;
 - The proposals were reduced from a maximum of 10 storeys, to a maximum of 6;
 - Additional massing and view studies were provided to confirm that a scheme of up to 6 storeys would be acceptable in townscape and visual impact terms;
 - Ground floor commercial uses at Building A were reduced in extent to just front onto the pedestrian route through the site;
 - Additional communal and private amenity space was provided;
 - Car parking provision was reduced from 140 spaces, to 36, with parking been relocated away from building frontages;

- The number of buildings was reduced and vehicle access consolidated to a single point, with the second and main thoroughfare being a pedestrian led shared surface, to be used by service vehicles only;
- The building proposed behind 'The Coolings' was removed to open up this area and remove any concerns of a poor relationship between existing and proposed;
- Tree planting was increased across the scheme.

4.4 Further to this initial approach to ECC, a formal pre application meeting was held on 12th November 2021, followed by a session with the Members Working Group on 14th December 2021. A summary note of these meetings was provided by ECC on 22nd December 2021, setting out the following key points:

- Redevelopment of the site is supported in principle for residential uses, and elements of commercial uses (food & drink, retail and employment).
- There is no planning objection to the removal of the existing buildings on the site.
- Consideration to the setting of Heritage Assets needs to be given in any proposal.
- Traffic calming or traffic free environment wherever possible on the site is encouraged in the interest of good placemaking and pedestrian safety.
- The opportunity to traffic calm and visually enhance sections of Haven Road between the site and Piazza Terracina is encouraged.
- A reduced or zero car parking scheme would be supported in this location.
- Cycle/car clubs for the public and residents should form part of sustainable transport measures.
- The impact of any redevelopment on air quality, and the impact of air quality on future occupiers, should be considered.
- Children's play space should be provided on site given the remoteness from existing play spaces.
- Co-living must provide good quality shared use spaces and adequate private internal space.
- Building heights/massing should maximise the potential of the site whilst integrating the development into the wider context and character of the area.
- The potential impact on adjacent residential buildings needs careful consideration.
- The potential for the development to meet any existing need for community uses should be explored.
- Affordable housing on the basis of 20% of the BTR dwellings at 80% discounted rent.

- 4.5 Subsequent to this receipt of pre application advice, the scheme has undergone further review by the EA (through a formal pre application discussion), Design Review Panel and a public consultation exercise.
- 4.6 Details of EA consultation are set out in more detail within the FRA and Drainage Strategy documents, however the discussions confirmed that flood defence works are now complete and that the remodelled data should be available this year. It was also confirmed by the EA that whilst the site is at risk, it is not a critical risk as it sits higher than much of the surrounding Water Lane area. It was also confirmed by the EA that Exeter has a very good flood warning process, well over the requisite 2 hours.
- 4.7 The key points emerging from a meeting on 24th January 2022 were as follows:
- New flood defences protect existing homes and businesses, but cannot be relied upon to fully mitigate future development.
 - Flood depth at the site, in a climate change accounted +40% event would be 0.7-1m, but estimated that the new flood defences could reduce this level by a third.
 - EA would seek finished floor levels 300mm above the worst case flood level
 - EA would want to see betterment in terms of flood risk to commercial elements
 - Strategy needs to mitigate against displacement elsewhere
 - Dry escape route required either south or north over bridge towards City centre
 - Design needs to incorporate a finished floor level increase of 1m above existing ground level to account for current worst case scenario.
 - Scheme was designed with 4.5m high ground floor, so this enabled raising of FFL within the existing envelope of the building.
 - Knock on benefit that this could help differentiate between private and public amenity.
 - Betterment to be provided by letting water pass beneath the buildings and taking into account the current displacement created by the commercial buildings.
 - Escape route to the north, via Cricklepit Bridge considered to be the most suitable option.
- 4.8 A meeting with the Design Review Panel was held on 8th April 2022, attended by DCC and ECC. Shortly after this, a public consultation event ran from 12th to 26th May, which included the circulation of a flyer, a dedicated consultation website, 2 drop in consultation events and separate meetings with the Friends of Exeter Ship Canal and Ward Members.
- 4.9 Following completion of these events, and further to conversations with the case officer at ECC, it is considered that the following points constitute the key matters raised, with details of how these

have been positively addressed following each point, either in the form of physical changes to the scheme, or through the provision of additional supporting information.

Building A relationship with neighbours

- 4.10 Following comments from residents on Diamond Road, Building A has been significantly redesigned to step away from the properties to the rear, incorporating a gable feature onto the public square to the SE and set back 2nd, 3rd and 4th floor levels. The gable form means the first floor of the proposed building now slopes away from the rear of properties on Diamond Road and that the second floor elevation is set well in from the boundary.
- 4.11 The relationship between the back of the houses on Diamond Road and the flank elevation of building A meets the ECC 1:2 ratio guidance as set out in the Residential Design SPD (figure 7.5).
- 4.12 At the northern end, the building height also steps down as it approached 78 Haven Road, improving the relationship at this end of the terrace too.
- 4.13 Private amenity terraces have been stepped away from the rear boundary and screening treatment added to ensure no views from terraces/balconies into the rear windows or gardens of properties fronting Diamond Road are afforded.
- 4.14 The gable form fronting onto the new square also reflects more historic development form found in the vicinity of the site, better reflecting the character of the wider area and canal basin.
- 4.15 Additional planting has also been added to the site boundary between buildings A and D, screening the rear garden of number 9 Diamond Road from the proposed public square area.

Flood Escape

- 4.16 The flood strategy provides a number of options for residents- to stay put within their home (all homes will have a finished floor level at least 300mm above the high flood level), to seek refuge on a higher floor or to leave the site with plenty of warning via the dry route, including escape via an emergency exit onto Diamond Road.
- 4.17 As touched on above, the dry escape route is provided by means of a raised area of footway between buildings C and D (accessed by dedicated escape corridors/doors from each building) and out the rear of building D, onto Diamond Road and then on up to Haven Road.
- 4.18 This has been discussed with and developed in conversation with the EA and is covered in more detail in the supporting reports accompanying this application.

Relationship between building B and The Coolings

- 4.19 Further to DRP and officer feedback, the eastern elevation of building B has been stepped in, increasing the separation between the new building and the rear windows serving the Coolings building. Whilst views of the flank elevation of building B, from the Coolings, would have only been at an oblique angle, the further stepping away of the new building further improves this relationship and separation between the buildings.
- 4.20 As discussed at DRP, the rear passageway between building B and the Activity Centre will be blocked off with secure access only for bin collections and cycle parking.

Public Art

- 4.21 There was a clear desire amongst local residents, amenity groups and businesses to incorporate work by local artists, or indicative of the maritime history of the site, in and around the development. The buildings themselves, as well as the public squares and open spaces around them, provide opportunity for such public art installation.
- 4.22 Building B includes a fascia panel at either end to improve the relationship and privacy between it and buildings C and D, and this also provides a prominent surface onto which public art can be incorporated. Draft examples have been tabled in previous submissions, but the detail can be secured by condition as necessary.
- 4.23 Further details can be subject to relevant planning conditions as deemed suitable following discussions through the application process.

Vista Treatment onto Diamond Road

- 4.24 Comments were raised about the termination of the view east along Diamond Road, stating a desire that the proposed building address this view, rather than turning their back on it.
- 4.25 The scheme has been amended so that external fenestration and treatment at the rear of building D ensures an attractive vista at the end of Diamond Road, terminating the view and enclosing the end of the street. Lower level planting will also help soften and terminate this view.
- 4.26 Windows on the rear elevation of building D provide outlook along Diamond Road and onto the flank elevations of numbers 9 and 18 Diamond Road, thus there is no loss of privacy associated with this relationship.
- 4.27 Whilst DRP suggested an option for permeability through to Diamond Road from the application site, it is agreed that this would not be suitable and also that residents along Diamond Road would

strongly object to such a proposal. On balance, it is agreed that the termination of the view along Diamond Road is a more suitable approach.

Mix of uses within the scheme

- 4.28 Comments were received from DRP and the case officer in relation to the mix of uses across the site. The mix of commercial and residential uses has been reviewed and it is apparent from market appraisal work that the current mix now submitted proposes the optimum quantum of floor space for each use.
- 4.29 Additional commercial units elsewhere within the scheme would simply not be viable and would likely remain vacant, detracting from the quality of the development and reducing active frontage through the site. There is also a fine balance to be had in terms of the impact on commercial areas around the Piazza and the desire to not detract from these by extending the commercial area too far to the south.
- 4.30 The commercial units proposed are located where footfall and thus viability is maximised, enhancing the commercial offer around Piazza Terracina and this section of Haven Road, drawing visitors into the application site.
- 4.31 Comments were raised by local residents about nature of the commercial uses proposed and it was suggested that there was need for additional medical uses within the area. The commercial units sought will be for use within class E, meaning they could be occupied by retail, food and drink, sports, office, childcare or medical uses. As such, the proposals are in line with neighbour comments in this regard.

Improved cycle access

- 4.32 Following comments from DRP about the convoluted route that some cyclists would need to take to access cycle stores at building C, amendments to the scheme now include a new cycle and pedestrian access to the rear of building C, accessed directly from the cycle path. This will reduce travel distances for cyclists and provide direct access to cycle stores, from the cycle path. In total, cyclists will benefit from 6 separate access points to the development, ensuring direct access to each of the 4 buildings and direct access to the associated cycle stores.
- 4.33 Further amendments to the site layout also includes for cycle and scooter hire hubs, located alongside the cycle path and within the main public square area, improving sustainable transport options in and around the site.

Corridor Length

- 4.34 Alterations to building C floor layouts above ground level have reduced corridor lengths and enabled the enlargement of 2 apartments on each level. The layout changes mean that the eastern core now provides access to a smaller number to units per floor, and that the other cores will just be used by residents with apartments nearest to that core, improving security and the homely feel of the development.
- 4.35 A single corridor is still required at ground level, to allow access to all cores from the central entrance point and amenity hub, but only residents within the particular core served by that lift, will access that particular lift.
- 4.36 The easternmost core will have a separate external access point which will be used by residents in that part of the building, reducing footfall along the internal ground floor corridor.
- 4.37 The corridors will be sufficiently wide with recessed doorways, designed to add interest to the corridor space and visually break up its length. In addition, the central space above the main entrance allows an enlarged area to stop and converse with other residents.
- 4.38 In reality, residents will only use the lift closest to their apartment, so will only travel a small section of the total corridor length and thus will only need to pass a handful of neighbouring properties.

Eastern Elevation of Building C

- 4.39 Concerns were raised by DRP about the potential for the eastern wing of building C to dominate and appear overbearing as viewed from the cycle path. It is however considered that the current design and building layout, stepped in from this boundary, addresses any concerns here.
- 4.40 Fenestration and balcony treatment fronting onto the cycle path will activate and add interest to this elevation, including active frontage at ground level. There is also a considerable separation between the path itself and the frontage of the building, with the land sloping up towards the ground floor terrace area and then the building itself. The proposed scheme includes significant landscaping in this area, softening the appearance of the building and creating a green setting and buffer as viewed from the path.

Building C Parking/Service Area

- 4.41 Further to comments raised by DRP, the parking and service area to the rear of building C has been redesigned, reducing hardstanding and softening the area. To achieve this, the rear amenity areas have been enlarged and linked by a pedestrian route, shielded from the parking area by soft landscaping. This has created a pinch point in the access road, reducing vehicle dominance and

allowing for additional greening. Parking spaces have also been interspersed by planting to further soften this area along the SE boundary.

- 4.42 This addresses the DRP comment to provide a more creative design and a 'relieving and traffic-calming intervention' in this area and increases the size of south facing amenity space to the rear of building C, as sought by the DRP.

Ground Floor North Facing Units

- 4.43 Further to comments raised by the case officer, the 3 north facing units at the ground floor of the east wing of building C have been provided with their own front doors onto an area of private amenity. These will front onto the public square area to the north, further activating this northern elevation, providing a higher quality residential unit and reducing footfall along the internal corridor behind the units.

Roof Design

- 4.44 A partial redesign and review of materials at roof level has helped to break up the skyline in longer range views, more in keeping with the pattern of roofs and materiality in the wider area. As recommended by DRP, we consider the proposed roof form to be a positive addition to the skyline.

Communal Kitchens

- 4.45 The number of kitchens within building D has been increased, so that all floors, with the exception of the top floor, are now served by a communal kitchen of a size sufficient to cater for the number of units using it.
- 4.46 The top floor contains a smaller number of units than the floors below and by virtue of them being larger units with larger internal kitchen areas, will place less demand on communal kitchens. As such, it is considered suitable that when needed, residents on the upper floor can utilise kitchen space on the floors below.

Parking

- 4.47 Concerns raised by local residents were centred around two parking related issues, namely the loss of existing parking and the impact this might have, and the demand for parking from new residents of the development.
- 4.48 In relation to the first point, parking surveys of the Haven Banks car park have demonstrated that it is used far from capacity, even at peak times during peak months. Similar surveys of nearby car parks have also demonstrated that there is ample capacity to accommodate parking displaced from

the application site, all within walking distance of the Haven Banks area. It is therefore considered that the loss of existing on site parking will not be to the detriment of local residents or businesses along the water front.

- 4.49 With regard to the second point, the nature of the development and the residential homes proposed is that they would not give rise to high levels of car ownership. The surrounding area is covered by Controlled Parking Zones (CPZ) so there is no concern that existing allocated residents parking in neighbouring streets will be lost.
- 4.50 Occupiers of the new development will be fully aware that parking will not be available before they take a tenancy in the development and this process alone will remove any potential applicant who wishes to bring a car to the development.
- 4.51 It is of course also pertinent that DCC, ECC and the DRP all encourage low or zero car development within areas such as this.
- 4.52 Congestion was another concern raised by residents, however the opposite will be true in this case, as the current use of the site and car park would give rise to a much greater number of vehicle movements when compared to the proposed use and limited parking provided.
- 4.53 These matters will all be covered in detail in a Transport Statement submitted in support of the application.

Daylight/Sunlight

- 4.54 Further to comments raised and as a standard part of the design evolution, daylight/sunlight and overshadowing assessment has been undertaken and support this planning application.
- 4.55 These studies demonstrate that public spaces will receive adequate sunlight, that the proposed homes receive adequate light and that there is no unacceptable loss of light to neighbouring gardens or rooms. This is discussed in more detail below.

Greening along Haven Road and Water Lane

- 4.56 The footprint of building A is necessary to provide a viable number of residential units and sufficient commercial floorspace, whilst also respecting the relationship with Diamond Road and stepping away from these properties to the rear. The form of building A also ensures a strong street frontage, improving the street scene and addressing the pavement by infilling a current open site. This of course has the knock on effect of necessitating the removal of existing trees along this boundary.

- 4.57 Whilst there is a requirement for the building to extend up close to the back of the pavement, greening and planting in this area has been maximised to soften this elevation and provide amenity value as you travel along and round the bend of Haven Road. Tree planting is proposed at the eastern and western end of this section, book-ending the building, with wider greening, shrub and hedge planting along the length of the frontage. Whilst this zone is fairly tight, removal of frontage terraces has enabled an increase in planting, ensuring a continuous green stretch between 78 Haven Road to the west and the main pedestrian entrance to the development to the east.
- 4.58 It is considered that the removal of existing trees along this frontage is adequately compensated by the significant increase in tree planting within the wider site and the urban design and townscape improvements associated with the construction of this infill building, strengthening the corner and drawing the streetscene around the curve of Haven Road.
- 4.59 At the other end of the site and since the DRP session, the terrace form along Water Lane has also been amended, allowing for significant tree planting and greening of this southern frontage and constituting a significant improvement when compared with the current stark and uninviting situation. This also helps soften the level change and height of the first floor as a result of flood defence requirements. Tree planting in particular is proposed around the main pedestrian entrance point, as well as around the vehicular access point to the eastern car park.
- 4.60 Whilst trees along the western boundary will also need to be removed, these are not of a particularly high quality and will be replaced by more suitable specimens. Where possible, existing trees will be retained and as mentioned above, the total number of trees planted throughout the site will mark a significant increase in overall numbers.

5.0 Planning Policy Context

- 5.1 This section considers the planning policies and legislative framework which together provide the context by which a planning application would be considered. It identifies the national, regional and local policies which are contained within statements of Government policy and the Development Plan for the area, or which may otherwise be material to the consideration of the proposed development.
- 5.2 The overall planning policy context is set by the National Planning Policy Framework (2021) and by the Development Plan which comprises the following documents:
- a) Core Strategy (February 2012);
 - b) Local Plan First Review 1995-2011 – Saved Policies.
- 5.3 The Council has also adopted a number of Supplementary Planning Documents (SPDs) which add to or expand upon policies within the Local Plan and are a material consideration in the determination of planning applications.
- 5.4 The following SPDs are considered relevant when considering the proposed development:
- a) Sustainable Transport SPD
 - b) Residential Design Guide SPD
 - c) Trees and Development SPD
 - d) Affordable Housing SPD
- 5.5 The relevant policies from the above documents are set out below.

National Planning Policy Framework (July 2021)

- 5.6 The revised National Planning Policy Framework (NPPF) was published in July 2021 and promotes the delivery of sustainable development that meets the needs of the community. Paragraph 8 sets out the three overarching objectives to sustainable development as follows:
- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.7 The revised NPPF retains a “*presumption in favour of sustainable development*”, with Paragraph 11 stating that “*For decision-taking this means ... approving development proposals that accord with an up-to-date development plan without delay.*”
- 5.8 There are a number of key paragraphs and sections contained within the NPPF which are relevant to the proposals and are summarised in brief below.
- Section 5 ‘Delivering a sufficient supply of homes’
- 5.9 Paragraph 60 emphasises the need for a variety of land to come forward for housing and to address specific housing requirements;
- 5.10 Paragraph 62 highlights that the size, type and tenure of housing needed for different groups should be assessed and reflected in planning policies.
- Section 6 ‘Building a strong, competitive economy’
- 5.11 Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- Section 8 ‘Promoting healthy and safe communities’
- 5.12 Paragraph 92 encourages planning policies and decisions to achieve healthy, inclusive and safe places with promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- Section 9 ‘Promoting sustainable transport’
- 5.13 Paragraph 111 states that development should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- Section 11 ‘Making effective use of land’
- 5.14 Paragraph 119 encourages planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses;
- 5.15 Paragraph 124 goes on to state that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing, local market conditions and viability, availability and capacity of infrastructure and

services, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed, attractive and healthy places.

Section 12 'Achieving well-designed places'

- 5.16 Paragraph 130 states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible and which promote health and well-being.

Section 15 'Conserving and enhancing the natural environment'

- 5.17 Paragraph 185 highlights that new development should be appropriate for its location, taking into account the likely and cumulative effects of pollution on health, living conditions and the natural environment as well as any potential impacts arising from the development.

Core Strategy (February 2012)

- 5.18 The Core Strategy was formally adopted on 21 February 2012. It sets out the vision, objectives and strategy for the spatial development of the city up to 2026. It also specifies the proposed levels of employment, housing and retail development and identifies broad locations for growth including strategic development allocations.
- 5.19 We have identified the following key policies of relevance with regard to the current redevelopment proposals:
- Policy CP1: 'Spatial Strategy', promoting the growth of Exeter within its environmental limits and requiring at least 12,000 new dwellings and up to 40,000 sqm of retail floorspace by 2026.
 - Policy CP3: 'Housing', which sets out the locations for housing growth, including regeneration areas and urban areas.
 - Policy CP4: 'Density', seeking the highest appropriate density compatible with the protection of heritage assets.
 - Policy CP5: 'Meeting Housing Needs', requiring a mix of housing to meet the needs of all members of the community.
 - Policy CP7: 'Affordable Housing', requiring the provision of affordable housing on all sites capable of delivering 3 or more additional dwellings.
 - Policy CP8: 'Retail', requiring the provision of additional retail floorspace within the city centre and within district and local centres where this would bring net benefits.

- Policy CP11: 'Pollution', requiring that development is located and designed to reduce air pollution and meet air quality objectives.
- Policy CP12: 'Flood Risk', requiring development to avoid areas of high risk and to mitigate against flood risk where practical.
- Policy CP13: 'Decentralised Energy Network', requiring developments to either connect to, or future proof connection to any decentralised energy networks which serve the area.
- Policy CP14: 'Renewable and Low Carbon Energy', requiring reductions in CO2 emissions.
- Policy CP15: 'Sustainable Construction', requiring a demonstration that development is resilient to climate change and optimises energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials.
- Policy CP17: 'Design and Local Distinctiveness', requiring development within the Quay and Canal Basin area to respect the historic character, provide high quality public realm, establish an attractive and safe environment, create vibrancy and encourage tourists and provide permeable built form.
- Policy CP18: 'Infrastructure', requiring development to be supported by appropriate infrastructure.

Local Plan First Review 1995-2011 – Saved Policies

- 5.20 The Local Plan First Review was adopted on 31 March 2005. Under the Planning and Compulsory Purchase Act 2004, the Exeter Local Plan First Review policies were saved for 3 years from the date the plan was adopted (until 31 March 2008).
- 5.21 The Act allowed the Secretary of State to extend the saving of policies beyond this date where it was not feasible or desirable to replace them and for Exeter, it was 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.
- 5.22 The saved policies which are pertinent to this application submission are set out below:
- Policy AP1 'Design and Location of Development', requiring development to be designed and located to raise the quality of the environment and reduce the need for car travel.
 - Policy AP2 'Sequential Approach', prioritising development on previously developed land.
 - Policy H1 'Housing Development Search Sequence', prioritising development on previously developed land.
 - Policy H2 'Location Priorities for Housing Development', permitting development at the highest density that can be achieved without detriment to local amenity, character, road safety etc.

- Policy H6 'Affordable Housing', seeking provision on sites providing 15 or more additional units.
- Policy S1 'Retail Proposals/Sequential Approach', identifying the provision of retail development at the Quay and Canal Basin area.
- Policy S5 'Food and Drink', permitting such uses in city, district and local centres, other commercial areas and areas of leisure use and public amenity.
- Policy T3 'Encouraging Use of Sustainable Modes of Transport', requiring development to be linked to existing and proposed developments and facilities, maximising sustainable modes of transport. Pedestrian and cycle links should be provided and safeguarded, as well as cycle parking,
- Policy T10 'Car Parking Standards', setting out maximum levels of parking.
- Policy C1 'Conservation Areas', requiring development to preserve and enhance the character and appearance of the area.
- Policy C3 'Buildings of Local Importance', resisting development which harms the architectural or historic value of the building.
- Policy EN2 'Contaminated Land', requiring site investigations prior to redevelopment.
- Policy EN3 'Air and Water Quality', resisting development which would harm the quality of air or water.
- Policy EN4 'Flood Risk', resisting development which would increase the likelihood of flooding or would be at risk itself from flooding.
- Policy EN5 'Noise', requiring consideration of the noise environment and emissions from the proposed development.
- Policy DG1 'Objectives of Urban Design', setting out design considerations, including connectivity, urban grain, character, density, mix, bulk, scale and massing and materiality.
- Policy DG2 'Energy Conservation', requiring design and layout to address solar gain, shading and embodied carbon.
- Policy DG3 'Commercial Development', stating that such development should face the main elevations, give priority to pedestrians, provide visual interest and screen storage and back of house areas.
- Policy DG4 'Residential Layout and Amenity', seeking a maximum feasible density and quality of amenity space.

- Policy DG5 'Provision of Open Space and Children's Play Areas', requiring development to provide playspace, or contribute towards playspace provision in the vicinity.
- Policy DG6 'Vehicle Circulation and Car Parking in Residential Development', requiring that vehicles don't dominate urban form and that parking areas are overlooked.
- Policy DG7 'Crime Prevention and Safety', ensuring a safe and secure environment, where public areas are overlooked, development is sufficiently lit and private areas are enclosed and secure.
- Policy KP6 'Quay/Canal Basin Area', seeking the development of a mix of tourist, leisure, housing, employment and specialist retailing uses in the quay, canal basin and Water Lane areas.

Emerging Exeter Local Plan

- 5.23 The new Exeter Local Plan is being prepared by the City Council. It will be the main planning policy document for Exeter and will include a vision and objectives for the city, a development strategy, sites for development and a series of planning policies. Once adopted, the new Local Plan will replace the Core Strategy and the current Local Plan Review.
- 5.24 The timetable for preparation of the new Exeter Local Plan is set out in the June 2021 Local Development Scheme as follows:
- Issues consultation: September 2021
 - Draft plan consultation: September 2022
 - Publication: February 2023
 - Submission to Planning Inspectorate: June 2023
 - Examination hearings: October 2023
 - Adoption: June 2024

Liveable Exeter Document

- 5.25 The Council have prepared a Housing Delivery Programme titled 'Liveable Exeter' which sets out key areas for housing growth within the city. The wider Water Lane Area, which includes the application site and extends eastwards, has been identified to provide 1,567 new homes, 4,115 sqm of shops and leisure, 6,397 sqm of work space, community space and a primary school.

6.0 Planning and Environmental Considerations

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Plan, unless material considerations indicate otherwise.
- 6.2 As discussed above, the proposals have evolved considerably through the consultation process, responding positively to comment raised by officers, the Design Review Panel and member of the community and interested stakeholders.
- 6.3 The application is supported by a suite of environmental reports, which confirm that the proposals are acceptable in all material considerations and will have no unacceptable environmental or amenity impacts on the area or neighbouring residents. The findings of these reports are summarised briefly below. We consider that the following matters are key to the consideration of the scheme submitted:
- Principle of Development
 - Design, Scale and Layout
 - Amenity Space
 - Landscaping and Arboriculture
 - Statement of Community Involvement
 - Heritage
 - Access, Highways and Parking
 - Affordable Housing
 - Flood Risk/Drainage/Contamination
 - Energy and Sustainability
 - Noise
 - Air Quality
 - Ecology
 - Fire

Principle of Development

- 6.4 The proposals constitute a key urban regeneration scheme on a sustainable and highly accessible urban brownfield site, providing significant numbers of much needed homes. As such, it accords

with the development plan and is a form of sustainable development which has the support of paragraph 11 of the NPPF.

6.5 The site is located within the urban area where local plan policies promote development. The mixed use nature of the redevelopment, providing various tenures of residential and commercial accommodation will form a new neighbourhood in this key regeneration location, acting as a catalyst to the wider redevelopment of the Water Lane Regeneration Area. Sitting at the northern end of the wider Water Lane regeneration area, the application site is the connection to the river and town centre, for land further to the southeast.

6.6 Through the extensive pre application discussions with ECC and the DRP, it has been agreed that the current retail use of the site is not protected and there is no desire to retain either the use or the buildings at the site. The principle of the mixed-use redevelopment of the site is fully supported, as confirmed the in ECC pre app response, which states:

'The redevelopment of the site is supported in principle for residential uses, and elements of commercial uses'.

6.7 In line with this, the DRP report stated, inter alia, that:

'The Panel supports a comprehensive redevelopment of the Haven Banks Retail Park that appears to be coming to the end of its useful life, and is at odds with the scale and character of its surroundings. We welcome in principle the proposal for a new, mixed use neighbourhood'

6.8 The proposals will transform a tired, underutilised and part vacant site into a vibrant new community, benefitting new and existing residents, neighbouring sites and the wider users of the Quayside area.

Housing Need

6.9 The 2014/15 SHMA identified a need for a higher proportion of 2 bedroom properties, to address the increasing requirement for smaller properties due to demographic and household formation change. It concluded that 60% of new residential developments should be 1 or 2 bedroom units. As of the date of the SHMA document, the future trend was considered to replicate the situation at the time and this was similar to the trends seen in the 2007 SHMA.

6.10 Population growth in Exeter has been just over 11% since the 2011 census, from 117,000 to 130,000 and over 14% between 2009 and 2019. This is almost double the average England growth figure (6.6%) and higher than the average south west growth (7.8%). As of 2021, Exeter is the fourth most densely populated of the South West's 30 local authority areas.

6.11 The University of Exeter has seen a 33% growth in student numbers since 2017, to over 30,000. The biggest growth is in the post-graduate category.

- 6.12 Housing stock in Exeter comprises approximately 73% houses and 27% flats, with private rental properties accounting for approximately 22% of the market. As such, there is clearly not an overprovision of either flatted accommodation, or rental accommodation, particularly given the urban nature of the city.
- 6.13 An estimated 64% of private rental properties in Exeter are occupied by either 1 or 2 people, against pointing to the demand for smaller rental units.
- 6.14 A search of Exeter's HMO register indicates that there are 53 current HMO licences in the St David's Ward area.

Residential Use

- 6.15 Core Strategy Policy CP1 sets a target to provide 12,000 new dwellings within the city over the Plan period with paragraph 4.11 highlighting the City Centre, existing centres and previously developed land including the Water Lane area as sustainable locations where development proposals should be given priority. Paragraph 6.8 reiterates this, highlighting Water Lane as an area for comprehensive mixed-use redevelopment which includes residential provision. In addition, the Liveable Exeter Document indicates a target of 1,567 new homes within the Water Lane Regeneration Area.
- 6.16 Whilst it is acknowledged that the site is not within the boundary of the Regeneration Area, it is a significant area of brownfield land situated immediately to the north and is therefore considered to provide significant opportunity to contribute to the aspirations for the wider area. It is also the most accessible site in the wider Water Lane area with the best connections to the town centre, therefore is ideally positioned to provide impetus for the redevelopment of Water Lane.
- 6.17 The immediate surrounding areas, particularly to the east, south and west, are predominantly residential in nature, interspersed with commercial uses along water lane and commercial uses around Piazza Terracina to the north and around the waterfront.
- 6.18 Policy AP2 gives priority to meeting general development needs on previously developed land, whilst Policies H1 and H2 encourage the provision of housing on previously developed land. The site comprises a large, predominantly vacant retail warehouse building and car park, developed in the mid 1980's but now of poor quality and offering nothing to the visual aesthetic of the site and wider street scene. As such, any redevelopment is considered to be in accordance with these policies and the Council's spatial strategy.
- 6.19 Through pre application discussions, it has been confirmed that the site is suitable for, and indeed in need of, redevelopment and that the principle of the uses proposed are acceptable.
- 6.20 The proposed BTR elements (buildings A, B and C) will provide a high-quality residential alternative for those not in the position to, or not wanting to own their own property. The BTR homes will

provide the benefits of high-quality managed accommodation, a strong sense of community and generous provision of amenity and flexible space for use by residents.

- 6.21 Policy AP1 seeks to reduce the need for car travel whilst Policy H2 encourages housing development in areas with good public transport accessibility. The site is served by several nearby bus routes and is in close walking distance to the main railway line. St Thomas District Centre is located approximately 300m to the west and contains a large mix of town centre uses, whilst Exeter City Centre is approximately 500m away and accessible via a footbridge 150m north of the site.
- 6.22 The site offers excellent opportunities for walking, cycling and use of public transport. As such it is considered highly accessible, well-served by a range of facilities and services and ideally positioned for a new residential community. This, together with the pre application feedback received, confirms the suitability of the site for residential redevelopment, in line with Policy AP1 above.
- 6.23 The scheme will provide 434 high quality new homes to suit a wide range of residential needs across all age ranges and all sectors of society. This constitutes a very significant contribution towards Exeter's housing targets.

Co-living Accommodation

- 6.24 The Local Plan does not contain any specific policies which relate to co-living as this is a relatively new type of housing accommodation. As such, at this stage it is considered that the requirements of Policy CP5 are most pertinent to this housing product. CP5 states that housing supply should meet the needs of all members of the community and that specialist housing should be provided as part of mixed communities in accessible locations. There is therefore clearly a presumption in favour of a range of housing tenures to serve the needs of as wide a population as possible.
- 6.25 Paragraph 6.23 of the policy justification considers the key characteristics of a mixed community to include a variety of housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people.
- 6.26 The most recent Strategic Housing Market Assessment (2015) indicates that there is a significant need for single-person accommodation within Exeter. Table 6-6 shows that those aged 16-34 represent the largest age group within the private rented sector (57.7%). Table 6-7 shows that in terms of household composition, the largest group living in private rental accommodation was single adults (28.7%), whilst Table 6-8 shows that the majority of households in private rent are single-person households (33%). Co-living accommodation would therefore meet a clear and demonstrable need for high quality, single-person homes.
- 6.27 The Council have recognised co-living as a form of specialist accommodation, as witnessed by two recent planning permissions (Ref: 19/1556/FUL and 19/1417/FUL), both of which include provision of co-living accommodation. The Officers' Reports both stated:

"The proposal for co-living is considered to be a specialist form of housing, which is mainly aimed at younger people who wish to live in a social environment that is well managed. It will provide accommodation for people who might otherwise live in a standard HMO and by doing so could possibly free up existing housing stock for family dwellings."

- 6.28 It is therefore evident that the Council are supportive of co-living accommodation and recognise its role in providing high quality housing which has potential to free up family sized dwellings currently in HMO use, of which there are 53 in the St Davids ward alone, and many more in the vicinity.
- 6.29 The residential nature of the surrounding area takes the form predominantly of family housing and semi-detached and terraced properties. It is considered that the majority of these will be in private ownership. As such, flatted and rental accommodation is under-represented within the wider residential area. The proposed co-living and BTR units will add diversity to the housing stock, providing an alternative product to achieve mixed and balanced communities. This fully accords with the requirements of policy CP5, which seeks housing to meet the needs of all members of the community.
- 6.30 Provision of such units generally appeals to young professionals, those just leaving university, key workers and those new to an area. The product acts as a stepping-stone to home ownership, for those who want more independence, but still want a degree of communal living and the benefits of the social interaction this facilitates.
- 6.31 There is a recognition across Local Authorities that the retention of talent and younger members of society is key to a successful and robust economy, particularly in areas such as these where there are considerable draws to other cities. Co-living accommodation provides an ideal form of housing to support this requirement, thereby supporting economic growth.
- 6.32 A common concern repeatedly raised by business is that good quality accommodation for staff is often one of the biggest barriers to expansion and recruitment. Accommodation in the form of that proposed goes a long way in redressing this imbalance.
- 6.33 Co-living accommodation is fully managed and professionally run, with the operator/management company having complete buy-in to the scheme and retaining its interest in the development in the long term, ensuring that standards and quality is retained throughout the lifetime of the scheme.
- 6.34 With the above points in mind, we consider that the co-living element would be a policy compliant and highly beneficial use of the site and will provide a much-needed alternative to HMO or market residential accommodation, which is dominant in this part of the city. Locationally, the site is ideally situated for this type of tenure, with easy access to public transport networks, employment opportunities, the city centre and local amenities. The introduction of this form of residential

accommodation (together with the BTR and commercial uses) will add vibrancy and vitality to the development and wider area, delivering a mixed and balanced community, essential to the successful regeneration of key urban locations such as this.

Commercial Uses

- 6.35 The site currently contains 2 large retail warehouse units (both vacant) and a bowling alley which fall under Use Class E of The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. Class E incorporates a wide range of commercial uses including restaurants, offices, light industrial, nursery, indoor sports and recreation, healthcare services and other uses.
- 6.36 Whilst retail use already exists on site and the principle of this is therefore already established, the commercial units proposed have the potential to introduce a new use to the site, given the flexibility afforded by use class E. The range of uses that could occupy the commercial units are all supported by virtue of them falling within the current use class and they will also create a much improved and more viable form of leisure offer, to the benefit of the site.
- 6.37 As set out above, the range of uses proposed aligns with support received through the pre application process and wider consultation, which welcomed the range of uses proposed for the site.
- 6.38 Notwithstanding the above in-principle support and established use position, it is also considered that all potential class E commercial uses fully comply with the relevant policies in the Local Plan.
- 6.39 Policy CP1 sets a target to provide up to 40,000 sqm of retail floorspace within the city over the Plan period. Policy CP8 encourages retail development within the City Centre and district and local centres first. It goes on to advise that new retail proposals must be accessible by public transport and other sustainable modes and be appropriate in scale and character to the role and function of the proposed location.
- 6.40 Whilst the site is considered to be an edge of centre location, its close proximity to the River Exe and Water Lane Regeneration Area create significant opportunity to increase activity in the area where a mix of uses are encouraged. The site is also well served by public transport opportunities and is within close walking distance to St Thomas District Centre and the main City Centre, meeting the latter requirements of Policy CP1 above.
- 6.41 Being located within the wider 'Quay/Canal Basin Area', the site falls within the Council's preferred locations for retail and leisure development, in accordance with policies KP6, S1 and S5 of the Local Plan. We also consider provision of retail and restaurant uses to meet the wider aspirations for Water Lane as set out in the Liveable Exeter document which encourages new shops and leisure uses, homes and other uses, serving both the new neighbourhood and also those visiting it.

- 6.42 Policy S1 encourages retail development within the Quay/Canal Basin Area, whilst Policy S5 supports food and drink proposals in commercial areas with active frontages and purpose-built cultural, leisure, retail or mixed-use developments. Similarly, Saved Policy KP6 aims to provide a mix of uses within the Quay, Canal Basin and Water Lane areas which includes restaurants and shops, leisure uses, housing and employment opportunities, amongst other uses.
- 6.43 When taking the above points into account, we consider provision of new retail and restaurant units is fully supported from a policy perspective and in line with the Council's vision for the wider area.
- 6.44 The Water Lane quarter is clearly a vibrant and active area, already benefitting from a number of food and leisure offers. The proposed mixed-use development and provision of flexible commercial floorspace will only increase this vibrancy in an area identified to accommodate a growing residential population.

Design, Scale and Layout

- 6.45 The NPPF attaches great importance to the design of the built environment and states that "*the creation of high quality, beautiful and sustainable 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.*" (Para 126).
- 6.46 Proposals should seek to maintain a strong sense of place and use building types, materials and spaces to create attractive, welcoming and distinctive places to live, work and visit.
- 6.47 Core Strategy Policy CP17 requires all development proposals to 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.
- 6.48 Saved Policy DG1 reiterates the above, requiring development to be compatible with the urban structure of the city, to integrate landscape design, be at a density which promotes Exeter's urban character, contribute to the provision of a compatible mix of uses, use materials which relate well to those in the locality, and be of a height which is appropriate to the surrounding townscape, amongst other criteria.
- 6.49 The form of development proposed has evolved through pre application feedback, public consultation, townscape analysis, a review of key views and rooflines and strong principles of good urban design and placemaking.
- 6.50 Building height has been significantly reduced since the original pre application approach, from a maximum of 10 storeys to a maximum of 6, considerably reducing the potential visual and amenity impact of the development.

- 6.51 Height and density is optimised at the centre of the site, away from sensitive neighbouring residential uses, whilst design changes have been incorporated on the more peripheral buildings to improve their relationships with neighbouring properties.
- 6.52 The tallest elements of each building have been stepped back with a reduced footprint to ensure no negative impact on longer range views or a sense of dominance in the street scene. The aim of the development is not to be invisible in the skyline but to contribute positively to a rich and varied roofscape that maintains and enhances the interest and attraction of the area and the mix of old and new.
- 6.53 The buildings are positioned to create strong and continuous active frontages onto Water Lane and Haven Road, as well as a new active frontage through the centre of the site. The current building offers a solid mass at the centre of the site, with no active frontage or architectural merit and which relates poorly to the surrounding road network. The proposal sets out a much-improved urban form, defining the various road frontages and linking in with the pattern of roads in the vicinity, whilst providing buildings of a scale not too dissimilar to existing developments.
- 6.54 The setting of each building allows for permeability through the site and good separation between neighbouring buildings, but also a sense of enclosure, overlooking of public realm and safety as you travel through.
- 6.55 The approach to building height has been considered with regard to the surrounding context. At the northern corner, Building A seeks to provide a gateway into the canal basin area, rising to 4 storeys nearest Haven Road, complimenting the 4 storey development to the north on the opposite side of the road. The building then steps down on the western and southern sides to respect the 2 storey terraced properties along Diamond Road and adjoining on Haven Road.
- 6.56 As set out above, the building has been further stepped down and away from neighbouring properties following feedback received at Design Review Panel and from neighbouring residents. Design alterations to incorporate a gable feature onto the area of public realm means that outlook from the rear of properties fronting Diamond Road is on to a single storey element with a roof sloping away from the boundary. Windows have been omitted in this elevation and terraces have been screened to ensure no overlooking. The top storey has also been stepped down to the west, improving the relationship between the proposed building and neighbouring properties on Haven Road and the northern end of Diamond Road, improving light levels and outlook.
- 6.57 The proposed form ensures optimised use of the site whilst respecting neighbouring residents and their amenity. The height onto Haven Road compliments the open space of Piazza Terracina to the east and creates a strong defined entrance to the application site.
- 6.58 Building B rises to a maximum of 4 storeys in height which and will sit below the roofline of the adjacent locally listed Quay Climbing Centre. The proposed height of Building B will ensure that

The Quay remains a prominent feature along Haven Road with no impacts to the rear in terms of views towards the locally listed building whilst also improving the appearance of the existing blank rear elevation of the climbing centre. Ground level active frontage faces southwest and northwest onto the new area of public realm and pedestrian circulation, to enliven and activate this part of the site and to encourage footfall and draw visitors through the site.

- 6.59 The building will provide an attractive vista at the end of the central access route, terminating views and drawing pedestrians through the site. Since previous iterations of the plan, the eastern elevation of the building has been shifted west, further away from The Coolings, in order to improve this relationship with rear windows serving the neighbouring flats. The separation from the climbing centre provides a service passage behind the building for cycles and bins, which will be secured for authorised access only.
- 6.60 The design of building B also allows for the incorporation of public art into the façade, with two large zones at either side of the southwest facing frontage, incorporating artwork.
- 6.61 Building C is the tallest of the proposed buildings, reaching a maximum of 6 storeys in height. The building will be set back at fourth and fifth floor levels, creating a strong shoulder height of 4 storeys on the southern elevation to respect the 2 and 3 storey dwellings along Chandlers Walk to the south. In this regard, the proposed Building C will comprise only one additional storey at its closest point when considering the overall height of these neighbouring properties.
- 6.62 There is also a substantial separation distance between proposed building C and these neighbouring properties, due to the presence of communal gardens, the servicing road and the proposed parking layout and rear gardens serving Chandlers Walk, all of which lie between the 2 buildings. This further mitigates any impact on the properties at Chandlers Walk.
- 6.63 It was established at the initial pre application meeting that 5 storeys would be an acceptable height for development at the site, however this conclusion was reached without the benefit of any real view analysis or townscape assessment, given the early stage at which the initial scheme was presented. Further work, as set out in the accompanying design pack, has confirmed that a further storey, restricted to a part-floor, towards the centre of the site, will have no negative impact on views and will not appear incongruous in the wider townscape.
- 6.64 The generous central amenity decks at 4th and 5th floor level break up the bulk of the building, splitting it into two sections, allowing light and views through the centre and also adding interest in terms of the roof scape. The building footprint of the top floor steps in from all elevations, whilst the footprint of the floor below also steps in from the main elevation at each end of the building.
- 6.65 At ground level, active frontage is created along the entire SW, NW and N elevations, as well as onto the cycle path to the east.

- 6.66 Building D rises to a maximum of 5 storeys with a substantial set back at third and fourth floor levels, therefore creating a shoulder height of 3 storeys on the north-western elevation. This approach respects the terrace of townhouses which front onto Stream Court and ensures a comfortable relationship between Building D and the adjacent residential uses.
- 6.67 Building D is also set away from the northwest boundary to ensure generous back to back separation distances between buildings. Given the step down from 4 storeys to 3 storeys, the top level apartments will be further separated from neighbouring properties on this side. This has the effect of removing concerns of overlooking, but also ensuring there is no overbearing visual impact, sense of enclosure or unacceptable loss of light.
- 6.68 At the Water Lane frontage, the height of Building D respects that of its neighbour to the northeast, before stepping up from 3 storeys to 4 towards the site entrance, creating a defined and strong frontage and access point. At the northern end, a strong rounded corner is created, drawing pedestrian through the development and providing active frontage and retail opportunities, fronting onto the area of public realm and circulation.
- 6.69 In summary, building heights towards the edges of the site, adjacent neighbouring residential uses, are predominantly restricted to 3/4 storeys to ensure a positive relationship between neighbours. Buildings are also set away from the northwest and southeast boundaries to improve the sense of openness and space between buildings. Height is then optimised at the centre of the site and on the road frontages, infilling a current unattractive gap site in the street scene.
- 6.70 As set out in the accompanying design pack, only partial or no views are afforded from a number of key viewpoints, including Colleton Crescent, the quayside, Larkbeare Road and the ship canal. The single element, which is only partially visible from these viewpoints, is the top storey of building C. In certain closer range views the proposed buildings are naturally more visible, such as from Water Lane, Diamond Road or the corner of Piazza Terracina, however these views demonstrate that the built form does not appear as out of scale or character with its surroundings. As you move around the site, these close range views become only glimpsed or totally obscured by existing surrounding buildings and there is no concern that proposed will dominate the existing in terms of scale and mass.
- 6.71 Vehicular access will be restricted to the southern end of the site, off Water Lane, with the main shared surface through-route giving priority to cycle and pedestrian movements. This provides the opportunity for the site and pedestrian environment to connect through to Piazza Terracina and the canal/river to the north and through to Water Lane in the south. As requested by officer's early on in the process, the number of separate buildings has been consolidated from 6 to 4 when compared to the original pre application scheme, ensuring that permeability follows the main desire lines and does not result in an overly fragmented or illegible development.

- 6.72 The north-eastern part of the site creates a loop road off Haven Road, providing pedestrian and cycle access around the back of the climbing centre and around the front of building B, drawing activity from the Piazza to the north, through the site and essentially expanding the public and pedestrian realm further south, offering additional retail and leisure opportunities. The public realm provision essentially connects existing communities, linking Water Lane and Piazza Terracina with a high-quality new space.
- 6.73 At the eastern side of the site, building C fronts on to the existing cycle path, overlooking this space and providing active frontage, whilst being stepped back far enough and separated by a landscape buffer so as to ensure the proposed building does not dominate this space.
- 6.74 The form of development proposed optimises the use of scarce urban land and through careful design and layout, creates a strong sense of place, with clearly defined pedestrian friendly streets and public areas.
- 6.75 In terms of the design and materiality of each building, this information is set out in detail within the accompanying Design and Access Statement. The design has evolved through a thorough understanding of the local vernacular and utilises materials and design features typical within the canal basin and wider Exeter area.
- 6.76 The general concept picks up on the horizontal and vertical elements found in the vicinity, including features such as projecting bays and horizontal banding. Material use includes red brick, prevalent in the local area, combined with buff brick for contrast. Upper storeys including standing seam metal whilst gabion stone walls are used for landscaping, in reference to the maritime history of the site and waterside location.
- 6.77 The proposals are therefore fully in line with the relevant design policies set out above and will bring much needed regeneration and a high-quality space to this key urban site.

Amenity Space

- 6.78 Chapter 7 of the Residential Design SPD 2010 sets out amenity space requirements for residential developments. Paragraph 7.10 states that for flats, private amenity space will consist of communal open space, private sitting out space for ground floor flats and balconies or roof gardens for upper floor flats. Paragraph 7.11 advises that the minimum requirement for communal space for flats should be 20 sqm per dwelling.
- 6.79 The document goes on to suggest that in addition to the above communal space requirements, ground floor flats should be provided with private sitting out space which is a minimum of 3m deep and the same width as the dwelling, whilst flats above ground floor should be provided with balconies a minimum of 2m deep and with a minimum floor area of 6 sqm.

- 6.80 It is of course a requirement for development to optimise the use of land, particularly on brownfield sites at the heart of an urban area such as this. It is considered that the above SPD, adopted over 11 years ago now is significantly out of date with the current drive for optimisation and intensification and that in reality, the provision of a minimum of 26sqm of amenity space per flat would result in a very low density development and an inefficient use of previously developed land. As a scarce resource, it is now more important than ever to ensure that development of brownfield urban land is optimised.
- 6.81 From a review of the text within the SPD, it is also considered that the 2010 guidance relates more to small flatted developments and does not necessarily envisage large, new urban neighbourhoods on brownfield sites. Discussions with officers through the pre application process established that they concurred with this view point and that they were keen to optimise density and therefore suggested that we were not restricted by the SPD standards.
- 6.82 Notwithstanding the above dated policy position, the proposed development seeks to maximise the provision of both internal and external amenity space, both communal and private. Generous external roof terraces across various levels, external gardens and large internal communal rooms will be provided for both the BTR and co-living elements of the scheme, facilitating a range of indoor and outdoor activities. As detailed above, the benefit of these models, particularly co-living, is the emphasis on communal activity, organised classes and events and management and therefore the provision of high-quality spaces in which to carry out these activities.
- 6.83 In addition to communal roof terrace and garden space, the majority of the larger BTR homes will be provided with private balconies.
- 6.84 Hard and soft landscaped space between buildings also provides additional amenity areas for residents to use and informal play space for children.
- 6.85 In addition to onsite provision, the site location also provides opportunity to enjoy public open spaces, particularly activity and walking routes along the River Exe and the Haven Banks Play Area. There are also large open spaces within 1.5km, including Cowick Barton Recreation Ground to the west, Flowerpot Park to the northwest, Bull Meadow Park to the northeast and Riverside Valley Park to the south.

Landscaping and Arboriculture

- 6.86 The application is supported by detailed landscaping proposals, set out in the landscaping plans and within the DAS. At present, whilst there are pockets of greenery around the edges of the site and some areas of soft landscaping within the central parking area, the site is inward looking, lacking in active frontage, disconnected from the Piazza and riverside and disconnected from the cycleway and housing to the east.

- 6.87 The landscaping builds on desire lines through the site, identifying opportunities to enhance connections, create nodes, ensure cycle and pedestrian priority, respect and enhance heritage assets, enhance biodiversity and create gateways.
- 6.88 The principle of the landscaping is to draw people into the site, create a sequence of spaces and emphasize the central pedestrian route through the site. These combine a mix of focal squares, gateways, communal gardens and thresholds.
- 6.89 The soft landscaping at ground level takes the form of a central linear open space, located in front of buildings C and D and dissected by a pedestrian pathway, communal residents gardens to the rear of buildings C and D and a public square area and series of connected spaces towards the Haven Road end of the site. Together these form the 5 landscape character areas of the scheme, the main street, northern gateway, main square, eastern gateway and communal amenity.
- 6.90 Additional tree and shrub planting around the perimeter of the site softens the building and creates an attractive setting and street scene onto Water Lane and Haven Road.
- 6.91 At the upper floors, soft landscaped terraces are found at buildings C and D, featuring soft planting and areas of seating at various levels.
- 6.92 At the southeast elevation, additional tree planting will soften the boundary between the two sites and together with a stepping away of the building and provision of communal gardens, will significantly improve the relationship between the site and Chandlers Walk, which currently takes the form of a service yard and the blank rear elevation of a retail warehouse.
- 6.93 The landscaping and significant tree planting proposed will create an attractive and welcoming environment, attracting pedestrians through the site and to the commercial operations therein. The proposals will ensure biodiversity net gain and a desirable place to live. Tree and plant species will be native where suitable and of a scale and type to best fit in with the landscaping strategy.
- 6.94 With regard to trees, a total of 27 specimens exist within the red line area of the site, predominantly located along the NE boundary with Stream Court and on the Haven Road frontage. Whilst these trees are covered by a TPO, an arboricultural survey undertaken by Fabrik concluded that of these 27 trees, 7 are class B, 19 are class C and 1 is class U. The tree officer at ECC has agreed with these classifications and thus it is clear that none of the trees are of a good quality.
- 6.95 At ground level, the landscaping proposals include the planting of circa 70 larger specimen trees and circa 65 smaller specimen trees and shrubs throughout the site, constituting a 5-fold increase in tree/shrub cover. When combined with border and lawn planting, there is clearly a significant uplift in greening at ground level alone.
- 6.96 It is considered that the quality and quantum of tree planting far outweighs any concerns relating to the removal of the 27 poor quality specimens which exist on site at present.

- 6.97 Those trees along the NW boundary will be replaced with a similar number of more suitable specimens, providing screening and a green buffer between the sites. To the north, onto Haven Road, whilst the existing trees add a degree of amenity to the road, their retention would preclude any form of development at this corner of the site, which would remain as an unattractive gap site in the street scene.
- 6.98 Building A occupies a key location at the gateway to the site from the river and Piazza, therefore requires a robust building addressing the street scene and identifying the access. There is a requirement for the building to step away from properties on Diamond Road and this, together with the desire to create a strong townscape, dictates the location of the building up against the back of the pavement. Notwithstanding this, planting has been optimised in this location, with two new trees bookending lower-level planting along the built frontage.

Statement of Community Engagement

- 6.99 Extensive pre application consultation was carried out with local residents and interested stakeholders, prior to submission of this application. This part of the process was run by Camargue and facilitated by input from the wider project team. An SCE, provided by Camargue, forms part of this application.
- 6.100 The document identifies correspondence with ECC, agreeing the scope and method of consultation from an early stage. The report sets out the methodology and approach to consultation, identifying the importance of such engagement.
- 6.101 The agreed formal consultation period ran from 12th to 26th May, although notifications went out and the consultation website went live from the 6th of May.
- 6.102 The consultation process took the form of a dedicated project website, direct mailing of an information leaflet to 1,500 local residents and business, meetings with political stakeholders and local groups, press releases and adverts and a 2-day public drop in event.
- 6.103 The consultation website contained all relevant details of the proposals, and provided contact details and feedback forms to enable visitors to ask questions and make comments on the proposals.
- 6.104 The 2-day consultation event, held at the neighbouring Outdoor Education Centre, attracted over 200 attendees across the 13th and 14th of May, many of whom left feedback.
- 6.105 Following completion of the consultation period, the team continued to engage with local residents and responded to questions received.
- 6.106 The feedback received is set out in detail in the SCE, but included a mix of responses and questions. In general, the need to regenerate the site was accepted and the proposed mix of uses was, on the whole, welcomed. Concerns were raised predominantly about the relationship with

neighbouring properties and car parking (both in terms of loss of existing parking and demand arising from the proposed uses). Responses to these queries are set out in the SCE, and also within the body of this planning statement.

- 6.107 The SCE goes on to confirm the thorough and compliant nature of the consultation process and that the scheme has evolved positively since the feedback were received, demonstrating the applicants commitment to the consultation period and listening to those concerns raised by local residents.

Heritage

- 6.108 Geoff Noble Heritage and Urban Design have produced a Heritage Statement in support of the application, considering the built heritage significance of the site and its surroundings. Whilst the site does not lie within a conservation area, nor does it include any listed structures, it does adjoin the Exeter Riverside Conservation Area and lies within the wider setting of listed and locally listed buildings.
- 6.109 The document sets out the relevant policy context application to heritage consideration, as well as the history of the site. It also sets out details of the site as we see it today, confirming that they make little contribution to the character or appearance of their surroundings, referencing the 'generic' nature of the buildings and 'sterile' nature of the car park.
- 6.110 The Statement undertakes a review of the Riverside Conservation Area, referencing removal of part of the northern extent of the application site from the Conservation Area in 2005. The Statement also reviews the nearby Southernhays, Friars, Princes Square and Exeter Central Conservation Areas, analysing their relative importance.
- 6.111 Relevant scheduled monuments and listed buildings identified, with those most relevant to the proposed development being the 2 warehouses on the canal basin, being of medium significance. The closest locally listed building is the former electricity generating building, adjoining the site to the north.
- 6.112 Given the absence of heritage assets on the site, the Statement confirms there will be no direct heritage impacts associated with the redevelopment.
- 6.113 Indirect impacts consider potential impacts on the setting of the Riverside Conservation Area, on the locally listed Electricity Generating Building and on the panorama from Colleton Crescent (pls other more distant views). In this regard, the Statement concludes:

'The modelled views confirm that the development sits comfortably in the backdrop to the Canal basin, behind Terracina piazza. The variation in heights ensures that a monolithic form or overtly horizontal emphasis is avoided. The dark roofs and wall materials draw on the legacy of historic industrial buildings in the area, without recourse to imitation'.

6.114 The proposals are considered to be visually appropriate and to assist in the connectivity of the area and night time economy, both enhancing the conservation area. The impact on the locally listed building will be positive, enhancing its setting and screening its blank rear elevation. No harmful impacts are considered to arise from the redevelopment.

6.115 The Statement finds that the following positive elements are relevant:

- Removal of a complex currently at odds with its surroundings
- Animation of the area
- Removal of car parking to the benefit of the area and environment
- Retention/protection of distant countryside and skyline views
- Use of local materials/palette
- No direct or indirect impacts on heritage assets

6.116 The Statement concludes by stating:

'The net result is that the Proposed Development will deliver minor but tangible heritage benefits to the Riverside Conservation Area. The setting of the locally listed former Electricity Generating Station will be enhanced'.

Access, Highways and Parking

6.117 The application is supported by a Transport Assessment, Travel Plan, Waste Management Plan, Construction Management Plan and Delivery and Servicing Management Plan, produced by RGP.

Transport Assessment

6.118 The Transport Assessment has been prepared to assess and demonstrate any potential impact of the redevelopment proposals on the efficient and safe functioning of the local road, pedestrian and public transport networks.

6.119 The document has evolved following pre application discussions with Exeter City Council, Devon County Council, Car Club operators, cycle hire operators and the general public.

6.120 Saved Policy T1 encourages development that facilitates use of sustainable transport modes, giving priority (in order) to pedestrians, people with mobility problems, cyclists, public transport users and other modes, with car borne users given the lowest priority.

6.121 Policy T2 states that residential development should be located within walking distance of a food shop and primary school and should be accessible by bus or rail to employment, convenience and comparison shopping, secondary and tertiary education, healthcare and other essential facilities. In terms of walking distance, Schedule 1 of the policy indicates a target distance of 500m and maximum distance of 1000m for food shops and primary schools, 400m target or 500m maximum

to bus stops and 750m target or 1000m maximum to other facilities. Secondary shopping and education facilities should be accessible within 30 minutes via public transport.

- 6.122 The site is within a highly sustainable urban location within easy walking distance of the town centre. There are a significant number of food and retail outlets within the area, including a Marks & Spencer Foodhall 450m northwest of the site as well as an Iceland and Aldi approximately 600m to the east. There are also additional convenience food retailers along Cowick Street to the north including Sklep Pawelek, Tesco and Co-op, all within 1km or less. There are also several retail options in St Thomas District Centre approximately 450m to the north.
- 6.123 The closest primary school is St Thomas Primary School, 800m west of the site. Whilst this exceeds the target distance of 500m, it sits below the 1km maximum threshold and thus is considered to be within an appropriate walking distance. It is also anticipated that an additional primary school will come forward in relation to the Water Lane Regeneration Area, being one of the key objectives in the Liveable Exeter strategy. It is therefore envisaged that additional school places will be available in the future within closer proximity to the site.
- 6.124 Policy T3 encourages the use of sustainable transport modes and sets out cycle parking standards for various developments. For general retail, 1 space per 45sqm should be provided for customers and 1 space per 200sqm for staff. For restaurants, 1 space per 10sqm should be provided. For residential dwellings, 1 space should be provided per 1-2 bed dwelling and 2 spaces for 3+ bed dwellings.
- 6.125 The total cycle parking requirement arising from the development will be 474 spaces and sufficient capacity is provided within each building to accommodate a total of 485 spaces. The provision per building is broken down as:
- Building A – 27 spaces
 - Building B – 21 spaces
 - Building C – 247 spaces
 - Building D – 190 spaces
- 6.126 Policy T10 sets out maximum car parking standards and states that 1.5 spaces should be provided per dwelling and that car free developments may be permitted in the city centre core area. As agreed with ECC through pre application discussions, these figures are considered outdated and it is confirmed that both ECC and DCC support car-lite or zero car parking provision in this location. As such, car parking provision has been minimised at 32 spaces, which includes 5 car club spaces, in line with the sites close proximity to public transport opportunities, the nature of the residential accommodation provided and the availability of pedestrian and cycle links to the city centre.

- 6.127 A road safety review has been undertaken, which has revealed just 3 accidents within 250m of the site, over the past 5 years. 2 of these were only 'slight' and none of them were attributed to highway design. Further afield, accidents have been even less frequent, demonstrating that there are no issues with the junction feeding traffic into the Haven Banks area.
- 6.128 The site is considered to have excellent accessibility credentials, with good walking, cycling and public transport connectivity.
- 6.129 In terms of trip generation, the report considers the potential trips arising from the proposed development, against those associated with the current permitted use. Key to this consideration is a reduction from 205 car parking spaces, to 32. The current use as a retail park is a heavily car-reliant use and also acts as a destination, attracting visitors from a wide catchment area.
- 6.130 Utilising comparable schemes through the TRICS database, the bowling alley would likely generate a total of 392 vehicular trips per day. In addition, the two retail units would have likely generated 1,274 vehicular trips per day. Combined, this totals an estimated 1,666 vehicular trips per day. This accounts for an estimated 66% of all trips made to the site.
- 6.131 In terms of the proposed use, a total maximum of 477 daily vehicular trips could be associated with the residential and commercial land uses, when comparing with similar developments on the TRICS database. It should also be noted that the comparable sites on the TRICS database all have significantly more parking, so the figure of 477 is very much an upper limit and in reality, will be much lower, given the limited parking available. Regardless of this however, this still equates to a reduction of 1,189 vehicle trips per day.
- 6.132 In comparison, trips on foot and by bicycle are estimated to increase by approximately 909 and 23 respectively, per day. It is also worth noting that a net reduction in trips by public transport would also likely occur, beneficial to the existing bus and rail networks.
- 6.133 The TA goes on to set out the servicing arrangements via the service yard and new laybys and emergency vehicle access, via retractable bollards at the Water Lane end of the site.
- 6.134 As detailed above, concerns have been raised by local residents regarding the loss of parking for users of the canal basin area and also potential for overspill parking by residents of the proposed development. With regard to the former concern, a capacity study of the current car park over a 10 month period has been undertaken, using the parking operators data, which demonstrates that occupied parking capacity ranges from 17% in November 2021, to a maximum of 23% in August 2021 and February 2022. It is also notable that the average of duration of stay, even in the busiest months, is 1h 41 minutes.
- 6.135 It is also demonstrated that there is ample spare capacity within nearby car parks to accommodate vehicles which historically would have used the application site. It should also be noted that the current car park was to serve the retail units on site and was never intended to provide public

parking for the wider area. The figures above do not account for this reduction in parking demand as a result of the removal of the retail park, therefore in reality, demand will be even lower.

- 6.136 With regard to the second concern, the nature of the residential accommodation provided and number of 1 bedroom units generally sees low car ownership levels. In addition, local parking is controlled by CPZ, therefore residents of the proposed development would be unable to utilise spaces outside of the site. This in itself is self-policing and would discourage car owners from taking up residence at the development. where CPZ is not in force, discussions are ongoing with DCC highways to address this matter.
- 6.137 Congestion was raised as a further concern of local residents, but the opposite will be true in this case. As detailed above, the movements that could be associated with the current use of the site and the 205 parking spaces would far exceed those associated with the proposed development and reduced parking provision.
- 6.138 A total of 5 car club bays are to be provided within the parking area, but outside of the secure fence line, to allow access to the wider public. This level of provision follows discussions with Enterprise and Co-Cars and flexibility will be provided to increase this number of required in the future.

Travel Plan

- 6.139 The Framework Travel Plan outlines the sustainable travel options to and from the site, as well as the measures and initiatives to be implemented to reduce reliance on the private car. The document highlights that within 2km of the site, considered to be a reasonable walking distance, residents and visitors would have access to 4 stations and numerous bus routes, as well as parks, schools, shops and employment areas. The national cycle route connects the site to the city centre to the northwest and wider areas to the southeast.
- 6.140 E-scooter and cycle hire facilities are proposed within the boundaries of the site, providing further sustainable commuting options.
- 6.141 The document goes on to outline local bus and rail services, including walking distances from the site, to stops and the frequency and destination of services. With regard to car club provision, it is calculated that each car club space displaces 18.5 cars.
- 6.142 TRICS data is used to establish potential travel behaviour at the site, estimates travel by sustainable modes to account for 67% of all trips. However, travel surveys will be carried out post-occupation to accurately establish travel behaviour.
- 6.143 The aim of the Travel Plan is to reduce reliance on the private car by actively encouraging sustainable travel and providing the onsite infrastructure to reduce the need to travel. The

document goes on to set out a summary of targets and timescales for achieving these targets. Specific Travel Plan measures include, but are not limited to, the following:

- Appointment of Travel Plan Coordinator (TPC)
- Provision of On-Site Facilities
- Bicycle Purchase Scheme
- Local Bike Shop Discounts
- Cycle Hire Schemes
- Public Transport Information
- Car Club Membership
- Welcome Packs

6.144 The Travel Plan is in framework format, but will likely be secured through a s106 agreement or via planning condition. This will include monitoring and update of the document, by the Travel Plan Coordinator, as the scheme becomes occupied and data becomes available about travel patterns.

Waste Management Plan

6.145 The Waste Management Plan (WMP) has been prepared to ensure that the redeveloped site operates with sufficient provision for the storage and collection of waste, in accordance with Exeter's Local Plan / Core Strategy objectives, the Devon Waste Plan and the waste storage guidance defined within the British Standards document BS 5906:2005.

6.146 The documents includes an assessment of likely waste arisings from operation of the development, together with the associated number of bins to accommodate this level of waste, amounting to a total of up to 50 x 1,100l Eurobins across the site, split across the 4 buildings and between the residential (43 bins) and commercial (7 bins) uses. In response to this, a total of 51 bins are provided.

6.147 Each bin will be provided within secure internal bin stores, at ground level, within each building. Residential and commercial bin stores will be kept separate.

6.148 Residents would have access to the residential bin stores and would transfer waste and recycling from their properties, to the storage area, as and when they like. The bins would then be wheeled out ahead of collection, to the 4 nearby collection points (3 accessed from Water Lane and 1 accessed from Haven Road) by registered personnel.

- 6.149 Collection from buildings A and B would occur from a new layby on Haven Road. Collection from building C would be via the service yard/parking area and collections from building D would occur from Water Lane.

Construction Management Plan

- 6.150 The CMP aims to provide a strategy for the management of construction traffic during demolition and construction. The document is in outline form and will likely be updated following the grant of any planning consent, assuming this is forthcoming.
- 6.151 The document identifies constraints and challenges in the vicinity of the site, including residential neighbours, the neighbouring climbing centre, commercial activity on Water Lane and pedestrian movement.
- 6.152 The CMP sets out the overview construction programme, including estimated durations for each phase. This part of the document is indicative at this stage and will be fully populated once further details are known.
- 6.153 Best working practices, including site hoarding, working hours, parking, laydown areas, vehicle routing and access are included within the Plan, ensuring minimal disturbance to local residents and user of the local area. Indicative demolition and construction site layouts are proposed, with the demolition phase purely serviced off Water Lane.
- 6.154 The Plan goes on to identify likely vehicles servicing the project and the routing strategy seeks to avoid quieter residential streets and school locations, with principle access via Alphington Street- a major highway link through the city. 'Just in time' delivery will ensure vehicles only access the site when needed.
- 6.155 Measures to reduce impact include:
- Deliveries within the site boundary and between 10am and 4pm only
 - Advance booking of deliveries and an up to date delivery schedule maintained
 - Traffic marshals in operation
 - Engines turned off when unloading
 - Wheel washing and road sweeping
 - Travel planning for staff arrivals and parking
- 6.156 The document goes on to discuss matters relating to waste management, dust control, non-road mobile machinery, air quality management, noise and vibration, setting out how these potential

issues will be addressed and mitigated against. These will be the responsibility of the contractors who will need to operate in line with the Considerate Contractors scheme. All the measures included within the CMP are standard practise for a development of this nature.

Delivery and Servicing Management Plan

- 6.157 The DSMP sets out the requirements to manage the transport impacts associated with the delivery of goods and servicing of equipment within the development.
- 6.158 Servicing infrastructure includes 2 new laybys, one each on Water Lane and Haven Road, accommodating deliveries, waste collection and pick up/drop off.
- 6.159 A servicing area is to be provided to the rear of building C, in place of the existing service yard, providing access to the building C bin stores and a delivery point for the wider building. Parking for 2 delivery vehicles is provided in this area. To the rear of building D, a further 3 delivery bays are provided, accessed off Water Lane. All goods drop off points are positioned conveniently for the various buildings they will serve. The vast majority of deliveries will be undertaken by LGV's.
- 6.160 Whilst overall deliveries will likely increase compared to the current use of the site, the current use required HGV delivery, which would no longer be the case following redevelopment. This, combined with the significant decrease in overall movements, as detailed above, makes for a much-improved situation.
- 6.161 Building management and commercial tenants would be responsible for managing deliveries as far as possible. The main points emerging from the DSMP are as follows:
- The site is conveniently located in terms of access from the wider highway network.
 - 2 new laybys combined with the retained service road and private driveway from Water Lane would accommodate up to 7 delivery vans simultaneously.
 - The largest delivery vehicle required by the site will be a 11.0m x 2.5m refuse collection vehicle.
 - The vast majority of deliveries would be carried out by 4.6t light vans.
 - Secure refuse stores will be provided on-site.
 - Residential refuse collections would be coordinated by ECC as part of an existing collection route through Haven Banks.

Affordable Housing

- 6.162 We are aware of the pressing need for increased provision of affordable housing and note the council's policy on this matter, including the most recent policy statement on First Homes.
- 6.163 In line with planning policy requirements and pre application discussions, the proposals will provide 20% of the BTR units at a 20% discount when compared to the market rent. There is no affordable element associated with the co-living units, as agreed with ECC. As a policy compliant position, it has been agreed that viability information is not required to support the application. Any such provision will be secured by an appropriately worded clause within a s106 agreement.
- 6.164 This formal affordable housing provision, together with a range of other BTR units and smaller co living units, will provide a range of affordable forms of accommodation across the site.

Flood Risk, Drainage and Contamination

- 6.165 In accordance with the EA Flood Map, the site is located within Flood Zone 3 and therefore flood risk is a key consideration. Flood defences have however recently been completed in the vicinity of the site, thereby lowering the risk, however updated modelling has not been issued by the EA as yet, so there is a requirement to design the scheme to meet the current requirements. It is highly likely however that there has been an improvement at the site in flood risk terms, since completion of the flood defence works and therefore the flood risk as set out in the FRA is overestimated.
- 6.166 The flood risk and drainage strategies, as well as the scheme design, have been developed through regular discussions with the EA and the scheme has evolved to one which is supported by them. The application is supported by a Flood Risk Assessment and a Drainage Strategy provided by Richard Jackson Engineering Consultants.
- 6.167 The FRA sets out that the site is at low risk from ground water, surface water and reservoir flooding, with the main risk being from fluvial and tidal flooding, considered to constitute a 'medium' risk. However it should be noted that despite the sites location in flood zone 3, it did not flood during any of the historic floods between 1950 and 1993.
- 6.168 The recently constructed defences have a crest level of between 9.0 mAOD and 9.46 mAOD, significantly higher than the estimated 8.32mAOD flood level in a worst case 1:1000 year event. The FRA goes on consider the potential impact of flood defence failure, albeit considered a very low likelihood of occurrence. If this were to occur, then the Flood Warning and Evacuation Plan (FWEP) will come in to action.
- 6.169 In terms of surface water, the FRA confirms that the current site is also 100% roof or impermeable surface, whereas the new surface water system will include rain gardens, permeable paving and

flow controls before outfall to the sewer. Reducing this surface water outflow will reduce flood risk both on and off site.

- 6.170 The finished floor level of the proposed residential elements will be set at 300mm above the worst case flood level, as per the EA requirements, which equates to approximately 1m above existing site levels at the Water Lane end of the site. Commercial elements will be set at 50mm above existing floor level to provide a degree of betterment.
- 6.171 In addition to the FRA document, the application is also supported by a Flood Warning and Evacuation Plan. The document sets out the procedures in place and provides instructions to residents in the event of a flood. It also provide useful contact details of responsible parties before, during and after a flood event.
- 6.172 Exeter benefits from a robust flood warning system, meaning residents will most likely be advised of any potential flood event, long before the event occurs, given them the option to evacuate their property in sufficient time. Alternatively, residents will be able to stay put and seek refuge in their dwelling, all of which are designed with floor levels above the worst case flood level. In an even more extreme flood event, residents will have the opportunity to seek refuge on floors above the ground floor.

Energy and Sustainability

- 6.173 The proposed scheme utilises a 100% electric approach, with air source heat pumps providing water heating and electric radiators providing space heating.
- 6.174 'Be Lean' measures will be incorporated into the scheme, including floor, wall, roof and glazing U values which go beyond the minimum part L requirements, for both the commercial and residential elements. Measures will also include improved double glazing, whole house ventilation and heat recovery, energy efficient lighting and time and temperature controls.
- 6.175 'Be Clean' measures include the potential for future connection to a district heat network, albeit ECC have confirmed that there is no such network serving the area at present. Provision for future connection to a district network will be incorporated into the scheme and communal hot water plant will be provided, served by air source heat pump.
- 6.176 'Be Green' measures include use of air source heat pumps and roof mounted PV panels. Other renewable technologies, such as bio fuel boilers, wind turbines and ground source heat pumps, were considered and reviewed, but for various reasons, as set out in the report, were discounted as not feasible for this development.
- 6.177 Utilising passive design measures and renewable energy technologies, the assessment concludes a carbon dioxide emission reduction of 22.39% on regulated energy usage and a 13.65% reduction on unregulated energy usage.

- 6.178 Water saving features will also be incorporated into the development, including all taps, showers, toilets and washing machines. Sustainable design and sustainability features will also be factored into the development, including significantly improved U-values over the Part L1A requirement, across both the commercial and residential elements.
- 6.179 The following materials shall also be specified as A+ rating:
- External Walls
 - Internal Partitions
 - Ground Floor
 - Internal Floors
 - Roof
 - Internal Ceilings
 - Windows
- 6.180 The submission also includes an Overheating Analysis. Thermal modelling has been undertaken to assess the buildings heating and cooling performance for the safety and comfort of residents.
- 6.181 All rooms will be naturally ventilated with openable windows, but will also feature MVHR units with a summer boost function. The analysis comprised assessment of a sample of apartments across the 4 buildings, with the results showing that all rooms passed.
- 6.182 As such, all rooms comply with the CIBSE TM59 guidance and given the findings of the noise assessment, can be naturally ventilated through openable windows, without the use of cooling.

Noise

- 6.183 The application is supported by a noise assessment undertaken by Auricl Acoustic Consulting. The Assessment considers the external noise affecting the site and the subsequent internal noise levels during the daytime and night-time.
- 6.184 An on site noise survey was undertaken in March 2022 over 2 days, at a time representative of typical noise levels during the day and night. 5 measurement positions were taken, covering each proposed façade of the development, with microphones positioned at each location, between 1.7m and 2.5m above ground level. All of the measurement positions were selected as being representative of background noise levels at the nearest noise sensitive properties to the site boundaries.
- 6.185 The results show that the dominant noise source is from vehicle movements on Water Lane and Haven Road, with some noise arising from commercial activities on Water Lane. Noise from commercial activities on Water Lane was considered to be appropriate and would not be readily

audible above the existing background noise levels in this area. It is also important to note that such noise emissions occurred during the daytime only.

- 6.186 Given the existing background noise level, the report goes on to recommend glazing and ventilation specifications to enable individual apartments to accord with required standards.
- 6.187 It was concluded that the southwest boundary onto Water Lane could be considered as a high risk area during the night time, in terms of noise levels and as such, ventilation via open windows onto this elevation may not be suitable during the night. In this scenario, MVHR ventilation would be the primary method of ventilation.
- 6.188 In terms of the other facades, the report found that *'use of opening windows as a primary means of mitigating overheating is not likely to result in adverse effect'*.
- 6.189 The report goes on to identify noise considerations for building services plant, setting out appropriate levels and possible mitigation measures, including selection of low-noise equipment and acoustic housing.
- 6.190 In terms of background noise levels, it is important to note that the proposals will result in a significant reduction in vehicular movement to and from the site, which could have a positive impact on current experienced noise levels.
- 6.191 It is also important to consider the regenerative implications of this proposal and the need to undertake comprehensive redevelopment and to robustly address all facades, particularly onto the adjoining road network. Whilst there could be some elevated night time noise levels experienced by those dwellings fronting Water Lane, the ventilation strategy mitigates against this and the importance of an improved street scene onto this south western elevation, activating and revitalising this frontage, is unarguable. It is considered that the planning gain associated with development onto Water Lane overcomes any minor noise infractions experienced by residents if windows were left open overnight.

Air Quality

- 6.192 Air Pollution Services (APS) have undertaken an Air Quality Assessment in support of the application, taking into account potential impacts on the wider area during the construction phase and also potential for impacts on future residents following completion of construction.
- 6.193 The site lies approximately 170m east of an AQMA, which was declared following breaches to NO₂ air quality objectives. As a result, the local area is therefore considered potentially sensitive.
- 6.194 The report confirms that the design of the scheme will be important in mitigating air quality concerns, including centralised energy plant, using air source heat pumps, electric charging points, accessibility to public transport, providing of cycle parking and cycle hire facilities and the adoption of a travel plan.

- 6.195 Also key to air quality improvements is the significant reduction in car parking and subsequent reduction in potential vehicle movements, including servicing, associated with the current permitted use.
- 6.196 The report concludes that the impacts from construction dust, construction traffic and NRMM emissions will be not significant and that a package of mitigation measures is set out to help minimise air pollution during the construction phase. These include communication with local residents, dust suppression, soft stripping and water suppression during demolition, sheeting or vegetating earthworks, undercover storage of materials where necessary and use of road sweepers/wheel wash on vehicles leaving the site.
- 6.197 In terms of the potential impact on occupiers, all estimated concentrations of air pollution are below the air quality objectives and limit values, and no exposure to exceedances will occur.
- 6.198 The impacts of, and on the development, have been concluded to be negligible or not significant in air quality terms.

Ecology

- 6.199 The application is supported by an ecological assessment and a Biodiversity Net Gain Report, compiled by Tyler Grange.
- 6.200 In terms of Biodiversity Net Gain (BNG) an assessment of the existing biodiversity value of the site has been undertaken, against the UK Habitat Classification and the Biodiversity Metric. In terms of existing habitat, at present this is limited to the shrub planting along parts of the boundary and the urban trees present around and on the site.
- 6.201 New native and ornamental planting will compensate for the loss of any existing habitat, providing connectivity through the site and enhancing diversity and habitat potential.
- 6.202 Habitat creation will comprise new areas of wildflower grassland, amenity grassland, brown roofs, ornamental planting and tree planting. In general, and in terms of tree numbers, the proposals will provide a significant uplift in the quality and quantum of habitat.
- 6.203 In addition to soft landscaping, bat and bird boxes can be installed throughout the scheme, providing further biodiversity enhancement.
- 6.204 Based on the habitat creation proposed, the report confirms a BNG score of +13.19%, with the report concluding that: *'As such, it can be demonstrated that the proposals would deliver overall gains in biodiversity and the development would therefore be in conformity with relevant planning policy and legislation'*.
- 6.205 The Ecological Assessment was produced following a site visit, including both external and internal building inspections. The report takes the form of a full desk study, a phase 1 habitat survey and a preliminary bat roost assessment. The desk based assessment confirmed that the site was not

covered by any statutory designations, although a number of such designations can be found locally. Habitats identified on site comprise the following:

- Hardstanding carpark
- Single metal framed building
- Introduced shrub planting
- Urban trees

- 6.206 As such, the report considers that the majority of the site is not suitable for most protected fauna and a phase 2 ecological survey is not required.
- 6.207 The site visit found no evidence of amphibians, badger, bat, dormice, invertebrates or reptiles and the 'importance' of the on site habitat for each of these species was assessment as being either not applicable, or negligible.
- 6.208 Notwithstanding the above, various mitigation measures are proposed, including ramped access out of trenches, a watching brief during demolition, use of minimal disturbance lighting, demolition outside of the nesting period and searches of any leaf or brash piles for hedgehog.
- 6.209 A Construction Environmental Management Plan (CEMP) and Landscape Environmental Management Plan (LEMP) will likely be secured by condition, adding further mechanisms to protect potential species and habitats present during demolition and construction.
- 6.210 The assessment concludes that: *'With the implementation of the mitigation and enhancement strategy described above, the proposed development would be in conformity with relevant planning policy and legislation'*.

Fire

- 6.211 The application is supported by a Fire Statement compiled by Orion Fire. The documents sets out the fire considerations for each building, identifying any technical complexities or other issues that could affect fire safety.
- 6.212 Fire safety measures and compliance with required standards is set out, including smoke ventilation systems, sprinklers, accessibility points for fire appliances, ensuring an unobstructed access route and the location of dry risers.
- 6.213 Any additional fire safety measures will be incorporated as the detailed design work continues post-planning, ensuring full compliance with the required standards.

7.0 Summary and Conclusions

- 7.1 The proposed development comprises a comprehensive urban regeneration scheme on a key brownfield site, making use of scarce urban land to secure the delivery of a significant quantum of much needed new homes, together with a mix of supporting and complimentary commercial uses, generous public, private and communal amenity space and townscape improvements.
- 7.2 The scheme involves the clearance of the existing poor quality and unattractive bulky building on site and construction of a mixed-use scheme ranging in height from 2 to 6 storeys and comprised of four separate buildings. The proposed buildings will be residential-led with a mix of uses at ground floor level including restaurant, retail and live/work units. The residential mix comprises market units, BTR homes and co-living accommodation.
- 7.3 The site is not allocated in the Local Plan or Proposals Map, however is within close proximity to the Water Lane Regeneration Area where a mix of uses is encouraged, including provision of a significant number of residential dwellings.
- 7.4 Whilst the site is not within the Regeneration Area boundary, its immediate proximity creates potential to contribute to the Council's aspirations for the wider area, kickstarting the redevelopment of the Water Lane sector and drawing new residents to this part of the town, through additional residential accommodation and improved facilities and amenities for the population in this key urban area.
- 7.5 The redevelopment scheme very much forms part of the wider evolution of Water Lane and being the most accessible site from the town centre, is a clear starting point for the regeneration of this wider area.
- 7.6 It is in a location where local plan policies strongly promote development and in principle therefore, the proposals accord with the development plan and create a sustainable form of development which has the support of the NPPF as set out at paragraph 11, integrating social, economic and environmental benefit.
- 7.7 The proposed development will offer a range of planning benefits for the site and surrounding area including:
- Transformation of a tired, underutilised and part vacant site into a thriving new community
 - Intensification of an underutilised, previously developed site with high quality buildings
 - The creation of active frontages onto Water Lane and Haven Road as well throughout the site, improving the townscape and appearance of the area
 - The re-provision of more suitably sized commercial uses, improving the leisure offer

- The delivery of 434 new high quality homes which will contribute significantly to the Council's housing target
 - The provision of a policy compliant level of affordable housing, as well as a more affordable housing product in the form of BTR and co-living accommodation, offering a high-quality choice of housing as an alternative to traditional flat/house shares
 - Provision of high-quality communal amenity areas and greening of the site
 - Improved flood mitigation and biodiversity improvements
- 7.8 Through comprehensive discussions with ECC, the redevelopment of the site has already been welcomed and it has been agreed that the current buildings and uses are of a poor quality and are not protected.
- 7.9 The principle of the proposed mix of uses have also been accepted by ECC. The mix of homes provided supports a dynamic urban population, across a range of tenures that meet identified housing needs. As set out above, there is a clear need for smaller residential units in this location.
- 7.10 The scheme has evolved through the extensive pre application process and all comments have been addressed positively. The built form respects and strengthens the street scene, whilst prioritising pedestrian permeability and creating strong linkages between Water Lane and Haven Road.
- 7.11 Car parking has been significantly reduced since earlier submissions, in line with ECC and DCC feedback, to ensure the promotion of cycling, walking and use of public transport, to improve the sustainability credentials of the scheme.
- 7.12 The form of development is based on townscape analysis and respects the roofline and key views from within the City and local landmarks. The layout links in with the pattern of streets within the area and develops this further, delivering new areas of public realm that connect existing communities, linking Water Lane and Piazza Terracina with a high-quality new space. The development will create a strong sense of place, with clearly defined pedestrian friendly streets and public spaces.
- 7.13 The proposals will provide a low carbon development scheme, incorporating significant areas of soft landscaping and tree planting, replacing those specimens that will need to be removed from the site to facilitate the development and providing a significant betterment in terms of number and quality of trees.
- 7.14 In conclusion, the development site is located in a sustainable location, accessible on foot from the city centre and in need of regeneration. The proposed comprehensive urban regeneration scheme will optimise use of this brownfield site, adding significantly to the vibrancy, diversity and mix of

uses and fully according with all relevant adopted planning policies and associated guidance at the local and national levels.