

Howard Smith  
City Development  
Exeter City Council

By email  
[Howard.smith@exeter.gov.uk](mailto:Howard.smith@exeter.gov.uk)  
[consultation@exeter.gov.uk](mailto:consultation@exeter.gov.uk)

21 August 2025

Dear Mr Smith

**25/0781/FUL. Mary Arches Street Exeter.  
Demolition of multi-storey car park and construction of a co-living development  
alongside public realm improvements, landscaping, cycle and car parking, servicing,  
refuse and recycling provision, and associated works. Mary Arches Street Car Park**

The civic society wishes to object to this application, although we support the redevelopment of this site for residential use as set out in the emerging Exeter Plan. The proposed design does not reflect the civic qualities, contextual approach and design/sustainability values required for such an important site location, and the applicant has not demonstrated an appropriate level of accommodation for future residents.

We are pleased that the applicant has referred to the emerging Exeter Plan policies because the emergence of co-living accommodation is a new form of accommodation not mentioned in the council's outdated Core Strategy. We hope that you will give more weight to the emerging Exeter Plan policies for this application than the dated Core Strategy which is now over 13 years old.

### **1. Civic Qualities & Street Engagement**

The proposed design does not reflect the civic qualities, contextual awareness, and design/sustainability values expected for such a prominent and historically significant site. While the architect defines this as a key corner site and gateway into the city, the proposal falls short in addressing both the immediate and wider urban context.

The main entrance is positioned on North Street, which may be acceptable in principle. However, due to the topography, this results in a 2-metre difference in levels along Bartholomew East. The consequence is a long, inactive elevation with blank façades, no street-level activation, and minimal street definition. We suggest relocating the entrance closer to the corner and adjusting the ground floor level to mediate between the two streets. This would help reinforce the corner's civic importance and allow for an active, engaging street frontage.

The corner treatment is unresolved. A mere change in façade material is inadequate to articulate this key urban marker. The proposal reads as superficial "facadism" rather than a

considered architectural response. Clear articulation in both plan and elevation—potentially through a setback entrance or recessed corner—would provide much-needed definition and a stronger civic gesture. The position of the entrances for the Quintana Gate student accommodation provides a good example for making an impact.

The long elevation to Bartholomew Street East does not fully benefit from activities in the social areas because the ground floor is elevated and not at street level. Elevation drawings show a retaining wall, and visualisations depict a narrow strip of planting and trees pushed against the building — creating a weak and artificial street presence. Although this is the primary elevation it remains lifeless, with no active uses at ground level due to the elevated floor level. In addition, the current position of the bicycle storage will negatively impact the façade if the windows are obscured – the storage should be integrated internally by taking advantage of the sloped site. **The applicant should clarify the status of the windows or re-locate the bike store.**

The main entrance could be positioned on the Bartholomew Street East side of the building if the ground floor level is reduced because it will enhance the pedestrian experience. Furthermore, by locating it on this side the layby is ideally positioned to support deliveries for residents.

## **2. Contextual Response & Conservation Area**

The scheme fails to preserve or respond positively to the character, architectural quality, and historic importance of the surrounding Conservation Area. The overall massing is overbearing and lacks articulation, with minimal sensitivity to neighbouring properties or long-range views.

The design and access statement references local vernacular principles, but these appear to be copied and reused across multiple elevations without real understanding or adaptation to site-specific conditions. The building lacks the detailed architectural character, grain, and proportion that define the surrounding context.

Furthermore, the proposal does not demonstrate how the building contributes positively to the historic streetscape or how its design and detailing respond meaningfully to its context. The proposed building is located a few meters from the city wall, the iron bridge, and the former site of the north gate- currently marked by a replica of the wyvern weathervane from the north gate.

## **3. Design Quality & Massing**

The overall massing is excessive, appearing bulky and overly dominant in relation to the surrounding built environment, especially in relation to the western side of North Street, where restoration work on the old buildings is on-going. The minimal step-down in height is insufficient in addressing the site's topography and neighbouring scale. A reduction of at least one storey across the site is strongly recommended, with a two-storey reduction considered more appropriate in parts of the development.

The earlier pre-application scheme included a setback roof, which has now been removed—exacerbating the building's visual impact. We recommend that this design feature is reinstated to comply with ECC's development brief set out in 8.1 of the D&AS.

The proposed elevation treatment is insensitive and lacks a contextual design approach. Vertical colour banding and roof-level pediments appear arbitrary, with no relation to local character. The pitched and varied roofline of surrounding buildings reflects historical grain and internal uses—something this design overlooks.

Rather than drawing from local examples meaningfully, the elevation feels like a pastiche that will not stand up to scrutiny at close range. The façade design should be entirely reconsidered, with a focus on scale, proportion, articulation, and contextual appropriateness.

**Materiality:** While the choice of yellow and red brick colours is noted, the rationale for their use is not convincingly demonstrated. Given the prominence of the site, materials must support an outstanding design of enduring quality.

#### **4. Housing Mix & Social Inclusion**

We are not convinced that the applicant's Co-Living Demand document produced by Knight Frank adequately demonstrates a need for more co-living accommodation in the city. It pays little attention to the council's Local Housing Needs Assessment. We will submit further comments regarding housing need in the city.

The applicant comments upon the London Plan space standards for co-living in the absence of ECC guidance (Policies H10 (A) and H4 (B)), but this site presents a clear opportunity to deliver a broader housing mix that supports inclusive and diverse communities. On a site of this size, conventional C3 housing should be incorporated alongside any specialist forms. Block B, due to its smaller scale and quieter setting, is especially well-suited for traditional residential use. Offering a mix of sizes and tenures in this block would contribute to a more balanced and sustainable neighbourhood. Is it considered good design to have the number of units shown accessed from single internal corridor without shared communal spaces? In student accommodation (which is a similar typology) smaller cluster numbers that support community are considered more appropriate and positively supported in moving away from mass-institutional approaches. In the proposed design 300 rooms have a single shared kitchen and dining area. This is clearly not in accordance with the Exeter Plan Policy H6c which states: *Include the following **minimum communal spaces and facilities at a sufficient quantity** to meet the needs of the total number of intended residents and located to provide each resident with convenient access.*

The provision of kitchens is one of these communal spaces to which paragraph 6.31 of the Exeter Plan states: *The **minimum communal spaces and facilities must be appropriately located for all residents – for example, residents should have easy access to a communal kitchen and should not have to travel between floors to prepare or eat meals.***

The current proposals do not meet the provision for communal kitchens (unlike the current application at the former Police station site which the applicant should review). **The applicant should therefore be asked to re-design the internal arrangement of rooms to ensure future residents have appropriate access to a kitchen/dining area.**

## 5. Environmental & Sustainability Approach

While the use of passive ventilation and air source heat pumps (ASHP) is welcomed, the environmental strategy lacks ambition and detail. For a development of this size and prominence, a zero-carbon target should be pursued, alongside flexibility for future technologies and changes of use. We are disappointed that there is no mention of re-using the existing solar panels on the car park because they are not that old. These would provide a constant level of cheap electricity for these proposals which will be occupied 24 hours a day.

**Mechanical Strategy:** The location and visual/noise impact of ASHP units are not specified. Any rooftop plant must be clearly shown in the drawings, including enclosures and acoustic mitigation, and how these will be seen from distant views.

**Ventilation Strategy:** The approach to heating and ventilating communal areas is not addressed. These services must be integrated into the overall environmental strategy to ensure comfort, efficiency, and low carbon impact.

**Adaptability:** The D&A Statement dismisses the potential for future adaptability. Paragraph 6.35 of the Exeter Plan states: *Since the market for co-living accommodation in Exeter is relatively new, applicants must show that consideration has been given to the future use of the building should it become surplus to requirements. For example, adaptations could allow the premises to be used as alternative build to rent housing or office space. The applicant should be asked to submit plans to comply with 6.35. This should include detailed consideration of stair/lift locations, dual-aspect layouts, and structural strategies to accommodate future retrofits.*

## 6. Public Realm & Historic Pedestrian Link

We would like to see the layby on Bartholomew Street East remodelled to see a continuation of the footpath and a private layby established on land controlled by the applicant with dropped kerbs.

The applicant suggests in their D&AS Design Vision and again in paragraph 6.7 that they wish to work in partnership with the local community and businesses to embed social value and public benefit for the neighbourhood. We support this and would like to see a significant contribution to the public realm by widening the pavement in North Street alongside the proposed entrance to improve the public realm with plants/trees. The pavement at the very lower part of the street cannot be widened because HGV lorries need to turn into the street. Residents of Block A and delivery vehicles should use the loading area in this area. Exeter Civic Society is currently working with businesses, residents, councillors, and others to develop ideas for improving the public realm of North Street, and we hope that the applicant and ECC will support proposals for improvements through this planning process. The lack of a delivery area adjacent to Block B will result in residents and delivery vehicles parking on Mary Arches Street and affecting traffic flow. We recommend that a parking space is established in the pocket garden off Synagogue Place to ensure that residents of Block B will have localised deliveries rather than to have to walk through the linked dining area to the reception off North Street.

The intent to retain the historic pedestrian route between North Street and St Mary Arches is unclear. Currently, this passage is a valuable, always-open link, providing public access

to the car park and enhancing pedestrian connectivity. Its proposed partial closure and gating will significantly reduce its usefulness. If the intention is to create a private or semi-private space, this must be clearly communicated and appropriately designed. Reimagining the route as a tranquil, well-landscaped “hidden garden” for residents and neighbours is positive—but only if clearly defined and supported by thoughtful design.

The suggestion that the route will be open during daylight hours is flawed when considering access during the winter months when it will get dark late afternoon. If you accept the locking of gates, the applicant should agree a minimum morning and evening timescale for access, e.g. 7AM to 7PM or at dusk (defined).

## **7. Servicing & Management**

The proposed plans lack a clear delivery, maintenance, and refuse strategy. Shared access from Mitre Lane does not provide space for deliveries, and loading bays are remote from entrances. Delivery storage locations, refuse collection, and long-term management need to be clearly outlined and resolved. The management plan lacks part 3 relating to the Travel Plan. The applicant should provide a statement regarding the Travel Plan in the Management Plan.

Currently there is a disproportionate arrangement of waste and bicycle storage between blocks A and B – it should be better balanced to reflect the number of rooms in each block, and to support the possibility of either block being remodelled for an alternative and independent residential use. With no circulation space between the two blocks other than through the community dining area, those dining will have the unpleasant experience of rubbish being transported through this space as well as those using their bicycles. The current proposal to use the layby on Bartholomew Street East for deliveries, moving in/out is flawed because it is remote from any of the entrances. With the proposed main entrance on North Street delivery drivers will be inclined to park in North street, and the only likely users will be the waste disposal lorries.

## **8. Transport and Travel Plan.**

Whilst the proposal for a car free development is commendable, the idea that 300 residents will not need a car is flawed. Paragraph 6.34 of the Exeter Plan states *Given the City Council’s net zero ambitions and because most of the occupants are likely to be young professionals adopting a car-free lifestyle, co-living developments should be located where day-to-day needs (including employment) can be met without using a private car.*

This does not state that residents will not need or want to use a car so, like many other recently approved co-living schemes, the applicant should provide a car share vehicle scheme within the development or nearby, and for this to be included within the Management and Travel plan. In addition, car parking provision should be made for residents with disabilities within the site. The application proposes 29 larger rooms for people with disabilities but neither the travel plan nor the management plan make any mention of supporting their mobility or travel needs. **The applicant should provide a reasonable number of on-site parking spaces for residents who have a disability, and for the applicant to provide a rationale for the number of spaces.**

## **Conclusion**

In its current form, the proposal lacks the architectural quality, contextual sensitivity, sustainable ambition, and appropriate facilities required for such a significant site and use.

Key concerns include:

- Poor articulation of the corner site and public frontage
- Inactive elevations
- Overbearing and inappropriate massing
- Superficial elevation treatment lacking contextual response
- Weak housing mix and social inclusivity strategy
- Inadequate dining and kitchen facilities
- Inadequate servicing and management plans
- Insufficient environmental and adaptability strategies
- A lack of car parking for residents who need to use a car.

We request that this planning application is Refused, as significant revisions are needed to ensure this scheme becomes a positive and lasting contribution to the city.

Yours sincerely

*K Lewis*

Keith Lewis.