

Planning Statement

Gladstone Road, Exeter

Prepared For

**Gladstone Road Exeter Limited
(Watkin Jones Group)**

9277

October 2019



bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 This Statement is submitted on behalf of Gladstone Road Exeter Limited (a company set up under the Watkin Jones Group) in support of a full planning application for the ambulance station site on Gladstone Road. The applicant is proposing the demolition of existing buildings and the redevelopment of the site to provide purpose-built managed student accommodation (154 bedspaces) with associated accesses/egresses, landscaping and other external works.
- 1.2 This Statement should be read in conjunction with other supporting documents, most notably the scheme drawings, the Design & Access Statement and the Student Management Plan.

THE WATKIN JONES GROUP AND FRESH STUDENT LIVING

- 1.3 The Watkin Jones Group is a market leading multi-occupancy residential developer with a proven track record in developing commercial, mixed-use and residential properties. Since the late 1990s, the Group has increasingly specialised in the development, construction and management of high quality, managed purpose-built student accommodation.
- 1.4 Nationally, the Watkin Jones Group has constructed approaching 40,000 student accommodation bedrooms to date and its management arm, Fresh Student Living, currently manages approximately 17,000 student bedspaces. Fresh Student Living already operates three developments within Exeter: Queen Street studios on Queen Street; Cricket Field Court on Prince of Wales Road and The Barn at Cheeke Street.
- 1.5 The Group has a national coverage with schemes covering the UK from Aberdeen in the north, Belfast and Cardiff in the west, Bournemouth in the south and various schemes in London. Other noteworthy schemes include the multi award-winning Sugarhouse Close in Edinburgh, Alice House in Oxford, Avon Studios and The Depot in Bath. The Group is involved at all stages of the development, from the inception and delivery to the completion and operation of the final product. The Group constructs its own developments.



- 1.6 The Group intends to secure planning permission, build and then operate the development. This is, therefore, a very real opportunity to secure, in the short term, the delivery of well-managed purpose-built student accommodation in a very sustainable location within the immediate vicinity of St. Luke's Campus.



2 THE APPLICATION SITE AND ITS CONTEXT

THE APPLICATION SITE

- 2.1 The application site has an area of approximately 0.26 hectares and currently accommodates the Exeter ambulance station. This is a brownfield site, comprising a large warehouse style building with a functional two storey office/ancillary building of little character, plus car parking.
- 2.2 The site is not allocated in Exeter City Council's Local Plan First Review and is subject to no environmental or other designations.
- 2.3 A mature ash tree is located on the Gladstone Road frontage of the site. A Tree Preservation Order was served on this tree on 20th August 2019. However, as is set out on page 2 of the Arboricultural Appraisal submitted with this planning application (please see Section 6 of this Statement for further details) a supporting note on the Tree Preservation Order file states that: *"The tree preservation order is not designed to be a constraint on development but to allow trees to be considered as part of any future development proposal."* A formal objection to the serving of the TPO has been made to Exeter City Council and the TPO has not yet been confirmed.

SITE LOCATION AND CONTEXT

- 2.4 The site is located on Gladstone Road, opposite Waitrose and close to the junction with Heavitree Road.
- 2.5 The site is in an ideal location for student accommodation, given its location in close proximity to Exeter University's St Luke's campus, which is on the opposite side of Heavitree Road, approximately 180m from the site, and Exeter City Centre, which is just 0.5 miles (approx.) to the west of the site. The site benefits from excellent public transport links (the closest bus stops are located just 160m from the site entrance (approx.), on Heavitree Road), Exeter Bus Station is just 600m (approx.) from the site) and there are very good services nearby.



- 2.6 The character of the surrounding area is very mixed in nature and the quality, design and massing of the surrounding buildings varies considerably. The site lies immediately to the north of the Devon and Cornwall Police Station site and opposite the entrance to Waitrose. Terraced housing is located to the north of the site, on Sandford Walk, and to the west are utilitarian three storey blocks of flats. The application site is, therefore, very much a transitional site. Section 3 of the Design & Access Statement sets out the heights of the surrounding buildings, which range from approximately 9m on St. Matthew's Close to approximately 20m in height on the Police Station site (immediately adjacent to the application site).
- 2.7 The site is located outside of, but close to, the Lower Summerlands and St Leonards conservation areas.

PLANNING HISTORY

- 2.8 There is no relevant planning history for this site.



3 PRE-APPLICATION DISCUSSIONS AND CONSULTATION

- 3.1 The applicant and its representatives have been involved in detailed pre-application discussions with Exeter City Council and other key stakeholders.

PRE-APPLICATION DISCUSSIONS

- 3.2 A total of four pre-application meetings were held with officers of Exeter City Council between June and September 2019, with additional interim telephone calls.

First Pre-Application Meeting (17th June 2019)

- 3.3 The first meeting was held on 17th June 2019 with case officer Zulema Nakata (Planning Applications – Project Manager) and Strategic Infrastructure Planning Officer Peter Hearn in attendance from Exeter City Council. The meeting was used to discuss an initial design document which set out initial urban design goals and design considerations and included draft sketches in key views and site sections. Officers' advice was sought on the principle of the proposed redevelopment of the site to provide student accommodation, design (in particular, materials and heights) and key technical issues.
- 3.4 Officers' initial views were that the principle of the redevelopment is acceptable and is line with the Council's ambitions to deliver more purpose-built student accommodation and its strategic policy (namely Core Strategy Policy CP5). All parties agreed that the site is in a very sustainable location, close to the City Centre and St Luke's Campus, which is key. Officers confirmed there is still a need for more purpose-built student accommodation, but the council does not have an up-to-date need report.
- 3.5 Officers advised that Saved Policy H5 of the Exeter City Local Plan (2004) would need to be addressed as part of any application and it would need to be explained clearly that the development would not result in an overconcentration of student accommodation in this area.
- 3.6 In terms of design, officers were, overall, happy with what the team put forward. Officers liked the initial sketches, felt they made sense and were appropriate for the site and were happy that permeability has been considered. Officers were also excited by



the design examples that were tabled by the project architects. In evolving the design for the site, the development of the police station site must be future proofed and there is a sensitivity to that boundary. Overlooking onto the properties on Sandford Walk must also be considered.

- 3.7 Officers felt that, in considering the context of the city, the design documents should pick out attributes of the wider city area and examples of high-quality design outside of the immediate area. A lot of thought would need to go into the quality and detailing.
- 3.8 Officers agreed with the design team that the view looking south from Gladstone Road is an important one and requested a cross section from this point. The applicant was advised to include a Visual Impact Assessment with the future application submission, considering 5-6 key views.
- 3.9 Officers advised that they would be seeking a car free development with a shared surface drop-off type arrangement.
- 3.10 Following this meeting, the case officer provided additional comments (on 8th July 2019) summarising initial consultation advice received on highways, noise and design, which were used to inform the next iteration of draft scheme sketches.

Second Pre-Application Meeting (13th August 2019)

- 3.11 A second pre-application meeting was held with the case officer (Zulema Nakata) and Strategic Infrastructure Planning Officer (Peter Hearn) on 13th August 2019, which was used to discuss the advanced sketch designs, including the proposed materials and landscaping. The key points of discussion/feedback were as follows:
 - The case officer advised that the removal of the ash tree on the Gladstone Road frontage is a sensitive issue and its removal would need to be justified robustly in a planning application. The Design & Access Statement should highlight the significant impact that retaining the tree would have on the developable area of the site/number of bedrooms that could be delivered. Ash Dieback Disease, which is present in the area, was discussed and it was advised that this issue should be assessed in a Tree Survey/Arboricultural Impact Assessment



submitted as part of the application. The proposed landscape solution for the site must be very strong –strong replacement planting will be needed.

- The case officer would prefer fluidity through the site and a rear access with a fob access should be explored further to future-proof the site in light of the future redevelopment of the police station site. The architects explained that fluidity needs to be balanced against providing secure space and the rear courtyard is clearly secure private space. The project team was advised to consider this further and speak to the local Designing out Crime Officer.
- The case officer requested further consideration of the roofscape/rooms in roof design and highlighted that it should be demonstrated that the scheme meets the requirements of the Residential Design SPG in terms of separation distances. Increasing the set back of the roof should be explored.
- The case officer welcomed the feature window treatment and thought the materials had been well thought through. The appearance of the higher elements of the building should be softened (drawing on the Atlas House example).
- More consideration should be given to windows on the south elevation – to ensure any future development of the neighbouring police station site would not be compromised.
- Massing needs some further consideration.

Third Pre-Application Meeting (22nd August 2019)

3.12 A third meeting was held on 22nd August 2019. From Exeter City Council, the meeting was attended by the City Development Manager (Andy Robbins), the Placemaking Officer (Chris Westlake) and the case officer (Zulema Nakata).

3.13 The meeting was used to discuss highways matters, namely the proposed layby, separation distances, height, connectivity through the site and landscaping.



3.14 All comments were considered and further design iterations were submitted to the local planning authority on 10th September 2019. The key points of discussion/feedback were as follows:

- Officers queried whether it would be possible to remove the layby on Gladstone Road and use the northern courtyard area within the site instead.
- Officers emphasised that the proposed design must not compromise the redevelopment potential of the Police Station site and also that the building must be stepped back on the northern elevation to ensure adequate separation distances between the development and properties on Sandford Walk. Officers also felt that the top storey should be stepped back to create a bigger recess on the Gladstone Road elevation and a smaller recess on the western elevation, facing St. Matthew's Close.
- The development needs to be secure but officers would also like to see fluidity through the site.
- The City Development Manager advised that as a mandatory procedure, when a site come forward as part of a pre-application advice request or a planning application the council will put a TPO on all trees that are worthy of retention. A case can be made to replace the tree if it can be demonstrated that the Ash tree does not have a long life expectancy and prejudices the developable area of the site. If it is to be removed, the advice given was that it must be replaced with much greater enhancements to the landscaping.
- The Placemaking Officer placed significant emphasis on the importance of a landscape buffer on Gladstone Road, with sufficient space for trees and planting (5m wide landscape belt) and would like to see mature trees on site. The Placemaking Officer would like to see, as part of the landscape strategy, information on tree growth, height and width of canopies, planting zones, tree trunk widths, root protection zones and lifespan.



- The City Development Manager queried the position on co-living, but highlighted that from a planning policy perspective (subject to all of the officers' points being addressed satisfactorily), student accommodation is supported. It was reiterated that the design and sustainability credentials must be exemplary.
- Officers requested massing drawings and a plan showing the view through the site towards St. Matthew's Close for the next pre-application meeting.

Fourth Pre-Application Meeting (17th September 2019)

- 3.15 A fourth pre-application was held on 17th September 2019. From Exeter City Council, the meeting was attended by the case officer (Zulema Nakata) and the Placemaking Officer (Chris Westlake). Also in attendance was an officer from Devon County Council – Highways (Lloyd Oriel). The meeting was used to discuss: building design, particularly heights and massing and the treatment of the gable ends and the southern elevation; landscaping and amenity space, particularly the landscaped buffer on the Gladstone Road frontage and revised arrangements for external amenity space; and highways and access, particularly revised arrangements for deliveries, student drop-offs/pick-ups and waste collection.
- 3.16 Overall, officers appeared to be generally happy with the changes and progress made and the latest proposals and no further pre-application meetings were deemed necessary. The key points of discussion/officer feedback were as follows:
- The proposed southern elevation works much better, with a 'breaking up' of the mass and a better fenestration:brick ratio. The different planes and textures work well.
 - The St. Matthew's Close set back is much better, as are the heights on the Gladstone Road frontage. The St. Matthew's Close sections should include additional local context to better demonstrate the relationship between the existing and proposed buildings.



- Materials will be tested in CGIs. Officers would like a bigger contrast between brick and roof. Seven key views were identified for CGIs.
- Increasing permeability to Heavitree Road will be important.
- A very strong landscaping buffer is crucial to show some public benefit in compensation for the lost Ash tree. A plan is required to demonstrate the size of the landscape buffer and that there would be enough space for replacement tree (and their future growth). The removal of the layby from Gladstone Road is a definite improvement. The owner would be responsible for landscape maintenance and management.
- The case officer had reservations about gated external amenity space but is more open to the idea of timed gates. Light structure gates work well.
- A simple dropped kerb giving priority to pedestrians is recommended for the vehicular access. Officers would like to see a tracking diagram of two simultaneous vehicle drop-offs.
- Officers were very supportive of St. Matthews Close access. The maximum gradient allowed would be 1:12.
- The location of cycle storage is acceptable, however it must be secure and sheltered.
- Officers were happy with waste collection from St Matthew's Close, as waste is already collected from there. The Management Plan will need to include the wheeling of bins to the gate on collection days.
- Officers will want the applicant to facilitate a crossing over Gladstone Road (dropped kerb with refuge island).
- Contributions will be sought towards a crossing over Heavitree Road to St. Luke's Campus.



MEMBERS' WORKING GROUP

3.17 The draft scheme was presented to the Council's Members' Working Group on 16th July 2019. A summary of key points made by members is provided below:

- Would not want the accommodation to be high-end/aimed at international students.
- Would want a contribution towards a pedestrian crossing over Gladstone Road.
- High quality materials needed.
- Sustainability is very important.
- Would like to see a clear recycling strategy.
- Would like the assurance that the owners would be responsible for landscaping management.
- Should consider co-living.
- Would want the building to be future proofed.
- Need to make it clear that the applicant would not just 'develop and run.'
- Cycle stands should be secure and covered.
- Would want to see a clear student management plan.
- Every effort should be made to discourage students bringing their cars and encourage the use of public transport.

DESIGN REVIEW PANEL

3.18 Draft proposals were presented to the South West Design Review Panel on 22nd August 2019. A summary of the feedback received is provided below:

- The Panel is supportive of the principle of a high-density development in this location.



- The Panel is supportive of the proposed palette of materials.
- There was concern that the draft proposals were too high and would benefit from further 'breaking up'.
- Elevationally, it was considered that the proposals would benefit from further consideration being given to the solid wall to fenestration ratio.
- The Panel welcomed the consideration that had been given to providing secure external amenity space. The Panel would like to see ramped access incorporated into the rear amenity space.
- If the Ash tree is to be removed, the Panel feels that the proposals should incorporate other appropriate tree planting of an appropriate size and species in mitigation. Whilst the Panel considers the ash tree to have a strong, important presence along Gladstone Road, it was recognised that it would be counterproductive for the proposed building design to be compromised to protect the tree should it be found to be in poor health.
- The Panel welcomes the provision of secure cycle storage, which should be located so that it can be properly monitored.
- The Panel suggested that the incorporation of integrated biodiversity and ecological habitat measures would be beneficial.

3.19 All points were considered as part of further design iterations.

PUBLIC, COUNCIL AND STAKEHOLDER CONSULTATION

3.20 Full details of the council, stakeholder and public consultation that has been carried out are set out in the separate Statement of Community Involvement, which has been submitted as part of the planning application.



4 THE PROPOSED DEVELOPMENT

- 4.1 The pre-application advice and engagement comments received, together with information provided by a wide range of technical studies, have culminated in the development of detailed proposals for the site.
- 4.2 Full planning permission is sought for the *“Demolition of existing buildings and redevelopment of site to provide purpose built student accommodation with associated accesses/ egresses, landscaping and other external works”*
- 4.3 154 bedspaces are proposed in a mixture of studios and cluster flats (37 studios and 117 cluster rooms). 5% of the rooms would be DDA compliant. The scheme includes the removal of the Ash tree on Gladstone Road and improved replacement planting as part of a quality landscaping scheme.
- 4.4 Full details of the scheme are provided in the planning application drawings (listed on the application covering letter) and the Design & Access Statement. However, a summary of the key points of the scheme is set out below

SCHEME DESIGN

- 4.5 It is proposed that the student accommodation development would comprise one building, which has been carefully designed to ensure that the amenity of the properties immediately to the north of the site and to the west are retained. The building is split into three distinct blocks, with lower elements to the north to reduce visual and shadowing impact on neighbouring properties and address the Residential Design Guidance in terms of separation distances.
- 4.6 The building has been designed to a high quality, with a quality palette of materials, including brickwork (buff colour), precast concrete/stone, glazing and a lightweight aluminium cladding at the upper levels. Window frames are proposed in a light reflective colour, which would provide visual interest with the brickwork and blend with the aluminium cladding. The glazed openings at ground level would maximise light into the



amenity and entrance spaces and allow views through to the proposed courtyard area from Gladstone Road.

- 4.7 The southern elevation has been designed to future-proof the redevelopment potential of the adjacent police station site. Four sections of this façade have been angled to direct views to the east and west. These angled sections also visually reduce the overall length and massing of the building. At the top storey a change in material from brick to a lightweight aluminium cladding (set back at angles) visually reduces the height of the building when viewed from street level. The ground floor of the eastern elevation is set back to create pockets of amenity space and interest in the street scene. There is a storey step from two to three to five storeys in response to the scale of the Sandford Walk properties. The western elevation steps from two to four storeys, with a fifth storey further set back and designed with contrasting aluminium cladding. On the northern elevation, where the building is closest to the Sandford Walk properties, the building is at its lowest, at two storeys. The building then steps up to three storeys at each gable, but with a further set back.
- 4.8 The scheme has strong sustainability credentials (as set out in the accompanying Energy and Sustainability Statement) and has been designed to achieve a BREEAM excellent rating.

Loss of Ash Tree

- 4.9 The proposals include the removal of the Ash tree on Gladstone Road. As set out in detail in section 6 of this Statement, a Tree Survey undertaken by Advanced Arboriculture in September 2019 identified the tree as being in clear decline, probably accelerated by the poor rooting environment and the fact that the grassed area surrounding the tree is heavily compacted (Ash is inherently intolerant of compaction). Advanced Arboriculture also advised that based on evidence observed across Devon, it is almost inevitable that this tree will succumb to Ash Dieback Disease (which has been present within the immediate area since 2016) in the near future. The conclusion of the Tree Survey was that the tree is not worthy of retention in the context of development. Furthermore, as is demonstrated in Section 5 of the Design & Access Statement, retaining the tree would



have a significant impact on the developable area of the site. Retaining the tree would result in a loss of 15% of buildable footprint per floor and around 25% of bedrooms (35 bedrooms) and amenity space. This would significantly affect the viability of the scheme and the ability to deliver a development that makes the most efficient use of this sustainable brownfield site close to the city centre.

Landscaping Strategy

- 4.10 Included with the application submission is a Landscape Design Statement, produced by TPM Landscape, plus a Landscape Layout Plan, ref. 3348 101M. The landscape strategy covers the street frontage along Gladstone Road, a main upper courtyard and smaller lower courtyards that would be accessed from the lower ground level of the proposed building and the boundary with Sandford Walk.
- 4.11 The Landscape Layout Plan and pages 6 and 7 of the Landscape Design Statement provide details of a strong, five metre landscape buffer on the Gladstone Road frontage. Three new large trees are proposed (one Small-leaved Lime and two Liquidambar), which would soften the frontage of the development and provide year-round interest. These trees would sit within planting beds containing a variety of shrub and herbaceous species. The replacement tree planting that is incorporated in the proposed landscaping scheme along Gladstone Road is of an appropriate size and species to mitigate the loss of the Ash tree and provide betterment to the local street scene. The Landscape Design Statement includes information on tree growth, height and width of canopies, planting zones, tree trunk widths, root protection zones and lifespan.
- 4.12 Seating and lighting columns are also proposed to frame the entrance, whilst providing a welcoming space for both residents and visitors.
- 4.13 External amenity space is proposed in the form of lower and upper level rear courtyard areas to the north of the proposed building, plus a south western courtyard, which provides a sunnier alternative. Access to the lower courtyard areas is provided on the western and southern elevations from the proposed lounge, kitchen, dining areas and from the northern elevation.



- 4.14 The existing wall would be retained on the Sandford Walk boundary, with five new trees to be planted in front of the eastern section plus one new tree adjacent to the proposed cycle store.

ACCESS/HIGHWAYS

- 4.15 The site is accessed off Gladstone Road. There are currently two vehicular accesses. The southern-most access would be closed, with the pavement reinstated. The northern-most access would be altered to form a dropped dropped kerb giving priority to pedestrians, rather than the existing bell mouth arrangement. This access would be used for drop-offs/pick-ups, emergency access and deliveries.
- 4.16 The main pedestrian access to the development would be from Gladstone Road via the main entrance. A secure ramped pedestrian/cycle access would also be provided onto St. Matthew's Close, which would also be used for refuse collection purposes. The proposed development incorporates an area for bin storage in the north western corner of the site and ramped access down to St. Matthew's Close, from where the bins would be collected. Two further pedestrian accesses (stepped) onto St. Matthew's Close are proposed, on the western elevation (to the south of the ramped access) and in the south western corner of the application site.
- 4.17 The scheme has been designed to be 'car free', with no car parking provision. Please refer to Section 7 of this Planning Statement and Section 6 of the accompanying Transport Statement for details of how the location of the application site lends itself to a car-free development and how this would be enforced as part of the overall Student Management Plan. Deliveries and student drop-offs/pick-ups would take place within the site, to the north of the proposed building. The Student Management Plan and Section 7 of the Transport Statement included with this application includes details on the proposed drop-off and pick up arrangements. To summarise, student move in and move out days would be staggered and each student would be given a 20-minute time slot to use the dedicated drop-off/pick up area. The loading area within the site can accommodate up to three cars, which means that it would take around 17 hours in total to fill/empty the development. This could be undertaken over one weekend (i.e.



Saturday and Sunday from 0900 till 1800), although it is commonplace for students to arrive and leave over a more staggered period. The process would be overseen by on-site management staff.

- 4.18 84 secure, covered cycle parking spaces are proposed within the application site.
- 4.19 The proposals also include a crossing point across Gladstone Road (towards Waitrose). The design details of the proposed crossing are included on the Proposed Ground Floor Plan, ref. 2407_310, and within the Transport Statement included with this application submission. This (along with other highway elements) would be delivered by the applicant under S278 works.
- 4.20 In addition to providing the new crossing over Gladstone Road, the applicant is willing to enter into discussions with officers of Exeter City Council and Devon County Council regarding any necessary and relevant contributions towards improved pedestrian crossing provision across Heavitree Road towards St. Luke's Campus.

SCHEME MANAGEMENT

- 4.21 Following a grant of planning permission, the applicant would build and then operate the development i.e. the Watkin Jones Group would not 'develop and run.'
- 4.22 The student accommodation would be managed by Fresh Student Living (Fresh), part of the Watkin Jones Group, specialising in offering student management services. Management staff, security staff, and / or wardens would be on hand 24 hours a day, seven days a week to address any concerns raised by occupants of the building or members of the public. There are established management procedures for the collection and drop off of students at the beginning and end of the year, which are described in section 6 of this Planning Statement and in the accompanying Transport Statement, which forms part of this application.
- 4.23 The creation of purpose-built student accommodation has the benefit of ensuring that students live in a highly managed environment. The management ensures that the student accommodation is fully integrated with the local area, to ensure that there are minimal and fully acceptable impacts upon residents, businesses, facilities and members



of the local community. Local residents and businesses are also provided with a contact point in case they wish to raise any concerns.

4.24 Fresh Student Living is a nationally recognised provider and operator of purpose-built student accommodation with a number of existing and proposed schemes ranging from 60 bed spaces to 650 bed spaces, details of which can be found on Fresh's website, www.freshstudentliving.co.uk. Fresh Student Living has an existing presence in Exeter.

4.25 A Student Management Plan is included as part of this application. This illustrates the current management principles undertaken by Fresh. Examples of some of the principles are set out below:

- Fresh is a member of Accreditation Network UK (ANUK). ANUK's National Code of Standards for Student Accommodation sets out a number of management principles which must be adopted and undertaken to maintain a high and 'assured' quality of student accommodation. ANUK is supported by the Department of Communities and Local Government (DCLG) and the National Union of Students (NUS), amongst others. ANUK accredits purpose-built accommodation provided both by the specialist providers within the private sector and by universities.
- As part of their agreement to reside at the scheme, students must sign an Assured Shorthold Tenancy Agreement (AST). The AST is a legal contract meaning that the ultimate recourse for contravention, although rarely required to be undertaken, is the potential suspension or termination of the agreement. Some typical terms of the AST are: the student has to be registered at a university or other higher education institution in the city and must be able to provide their UCAS number to obtain accommodation; students are strongly encouraged not to bring motorised forms of transport to the town/ city in which the student accommodation is located; and it includes a series of requirements relating to nuisance and noise, including the requirement for the scheme to be 'quiet' between 11pm and 7am.



- An accommodation manager would be responsible for the day-to-day running of the development and would address any concerns raised by residents or neighbours. Overnight management would be provided by security staff and/or retained student wardens (mature students) who live on site to deal with any incidences which arise. All staff, including student wardens, are equally trained in first aid, fire management and incident management.
- In Fresh's experience, the behaviour of students is influenced by the quality of environment in which they reside. In an image-based business such as purpose-built student accommodation, a high-quality image is essential for the future lettability and success of the scheme. A good, clean and well-maintained environment is conducive to respect and appropriate behaviour from residents. CCTV is provided to supplement the presence of on-site staff, management and natural surveillance.

4.26 The Student Management Plan details the current practices and principles undertaken by Fresh Student Living. Such principles and practices evolve over time through requirements of local authorities, universities or through changes in legislation or best practice. Should Exeter City Council require details of any changes to management, it is suggested that the submission of a further management plan is conditioned upon planning approval, allowing the submission of further details prior to the occupation of the scheme.



5 RELEVANT PLANNING POLICY

5.1 Planning law (Section 38(6) of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan documents for this application are the:

- Exeter Core Strategy (adopted 2012);
- Exeter Local Plan (2004) Saved Policies.

CORE STRATEGY (2012)

5.2 Exeter City Council's adopted Core Strategy sets out the vision, objectives and strategy for the spatial development of the city up to 2026 and contains the local authority's strategic policies designed to meet these.

5.3 Within the adopted Core Strategy, the University of Exeter and Exeter College are identified as being centres of educational excellence, with regional and sub-regional roles. Both are expanding.

5.4 One of the key employment issues listed within the Core Strategy is the challenge of accommodating university growth. Paragraph 2.11 states that the University is very important to the economy and vitality of the city, but the growth of student numbers places pressure on the local community, particularly in terms of facilities and student accommodation and impact on the housing stock.

5.5 The continuing growth of the University is seen as important to the future prosperity of the city. Paragraph 6.28 of the Core Strategy states that the University had 12,929 full-time students living away from home in 2010/11 and envisages that it will have approximately 3,300 additional full-time, living away from home students by 2025/26. The University's aim to provide housing for all full-time students who want it is supported because it will ease pressure on existing family housing. The Core Strategy states that 75% or more of additional student numbers should be accommodated in purpose-built student housing. New purpose-built student housing should be located



on, or close to, the University Campuses, at sustainable locations at or near to major transport routes, or in the city centre.

5.6 The following policies are of particular relevance to the proposed development.

Policy CP5

5.7 Core Strategy Policy CP5 states that:

"The supply of housing should meet the needs of all members of the community such that:

- all major developments (10 or more dwellings) should include a mix of housing informed by context, local housing need and the most up to date Housing Market Assessment;*
- specialist housing, such as wheelchair accessible housing, sheltered housing, residential care homes, 'extra care' housing and continuing care retirement communities should be provided as part of mixed communities, where possible, in accessible locations close to facilities;*
- all housing developments should be designed to meet Lifetime Homes Standards where feasible and practical; and*
- purpose built student accommodation should be provided to meet the housing need."** [our emphasis]

Policy CP15

5.8 Policy CP15 expects development proposals to demonstrate how sustainable design and construction methods will be incorporated. All development must be resilient to climate change and optimise energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials, and by using technologies that reduce carbon emissions.

5.9 All non-domestic development is required to achieve a BREEAM 'Excellent' rating.



Policy CP17

- 5.10 Policy CP17 requires all development proposals to exhibit a high standard of sustainable design.

EXETER CITY LOCAL PLAN (2004) SAVED POLICIES

- 5.11 The saved policies of the Exeter Local Plan First Review 1995-2011 form part of Exeter City Council's development plan and set out the Council's more detailed approach towards development in the city.
- 5.12 The Proposals Map which accompanies the Local Plan shows that the site is not subject to any specific designations or land use allocations

Policy H5 – Student Housing

- 5.13 Saved Policy H5 states that:

"The conversion of dwellings to flats, self-contained bedsitters or houses in multiple occupation and the development of special needs or student housing will be permitted provided that:

(a) the scale and intensity of use will not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on-street parking problems;

(b) the proposal will not create an over concentration of the use in any one area of the city which would change the character of the neighbourhood or create an imbalance in the local community;

(c) special needs housing is located close to local shops and services, community facilities and bus routes;

(d) student accommodation is located so as to limit the need to travel to the campus by car."



SUPPLEMENTARY PLANNING DOCUMENTS

Sustainable Transport Supplementary Planning Document (2013)

- 5.14 The adopted Sustainable Transport Supplementary Planning Document (SPD) provides further detail in relation to Core Strategy and Local Plan policies.
- 5.15 The SPD sets out within Table 2 minimum cycle parking standards for student accommodation development. For the first 10 bedrooms one cycle space per bedroom is required. For the 11th bedroom upwards, one cycle space per two bedrooms is required.
- 5.16 Chapter 8 of the SPD covers travel plans and sets out Devon County Council's general requirements. Comprehensive travel plans are required for student accommodation schemes with 50 or more rooms.
- 5.17 Chapter 9 of the SPD covers off-site improvements and states that where improvements to transport networks are necessary to accommodate journeys generated by the development, and to enable and encourage use of sustainable modes for those journeys, the development will be expected to make a financial contribution towards those improvements.

Residential Design Guide Supplementary Planning Document (September 2010)

- 5.18 This SPD provides guidance for all those involved in building new homes in Exeter. The SPD includes guidance on design objectives and design process, layout design, parking, residential amenity, bin storage, building design and public realm design.

Supplementary Planning Guidance for Development Related to the University of Exeter (June 2007)

- 5.19 This supplementary planning guidance (SPG) was agreed by Exeter City Council's Executive in June 2007 and is a material consideration in the determination of planning applications.
- 5.20 The SPG sets out nine principle, of which the following relate to the proposed development:



- *“The City Council supports the intention of the University to expand. The City Council, where appropriate, will impose planning conditions or seek a planning obligation to ensure that expansion in the University’s teaching, research and general facilities is accompanied by the provision of significant increases in purpose-built student residential accommodation, such that 75% or more of the additional student numbers are accommodated.”*
- *“The City Council seeks the provision of as much purpose-built student housing as possible to reduce the impact on the private sector housing market.”*
- *“The City Council recognises that relatively high-density managed accommodation on appropriate sites will need to make a significant contribution to meeting future needs. Developments will be permitted subject to management and supervision arrangements appropriate to the size, location and nature of occupants of schemes.....”*
- *“The City Council.....expects accommodation providers to rigidly enforce no car tenancies.”*

DRAFT POLICY

Development Delivery Development Plan Document – Publication Version (July 2015)

- 5.21 This document has not been adopted and does not form part of the development plan for the area. Once sufficient progress has been made with the Greater Exeter Strategic Plan, the Development Delivery Plan will be revised and updated. Adoption is not anticipated until December 2022 (according to Exeter City Council’s Local Development Scheme).
- 5.22 The draft document recognises that by maximising the number of additional students accommodated in purpose built student housing, further adverse impacts on the private housing market can be minimised. Draft Policy DD12 seeks to protect residential amenity and to ensure that PBSA is fit for purpose. It is a permissive policy and states that:



“Purpose built student accommodation will be permitted provided the proposal:

- a. Respects, and contributes positively towards, the character and appearance of the area;*
- b. Does not result in unacceptable harm to the amenity of neighbouring residents;*
- c. Provides sufficient internal and external space for future occupiers;*
- d. Makes appropriate provision for refuse storage, operational and disabled persons parking, servicing and cycle parking;*
- e. Reduces the need travel and would not cause unacceptable transport impacts; and,*
- f. Is accompanied by a suitable Management Plan secured by planning obligation to demonstrate how the property will be managed in the long term.*

NATIONAL PLANNING POLICY AND GUIDANCE

The National Planning Policy Framework (2019)

5.23 The National Planning Policy Framework (NPPF) (February 2019) sets out the Government’s planning policies for England. Although not development plan policy, it represents important guidance which sets out the Government’s approach towards planning for new development. As such, it is an important material consideration. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10) which should be seen as a foundation for both plan-making and decision-taking (paragraph 11).

5.24 Paragraph 8 sets out the three overarching objectives to achieving sustainable development: economic, social and environmental. These objectives are interdependent, should be pursued in a mutually supportive way and are summarised as follows:

- Economic objective – to help build a strong, responsive and competitive economy, by ensuring sufficient land of the right type is available in the right places at the right time to support growth...;



- 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 the present and future generations; and by fostering a well-designed and safe built environment.....;
- Environmental objective – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve diversity... and mitigate and adapt to climate change...

5.25 Section 11 on ‘making effective use of land’ states that planning policies and decisions should ‘*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*’ (paragraph 118c).

Planning Practice Guidance

5.26 The Planning Practice Guidance states that:

“Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.” Paragraph: 004 Reference ID: 67-004-20190722.



6 ANALYSIS OF TECHNICAL MATTERS

6.1 The applicant has commissioned a number of consultants to carry out a wide range of detailed technical studies to develop a scheme that meets the relevant policy requirements, whilst also providing a viable and deliverable reuse of this sustainable brownfield site.

6.2 To support this planning application, the following technical reports are provided:

- Archaeological Desk Based Assessment – produced by RPS Group
- Air Quality Assessment – produced by Redmore Environmental Ltd
- Contamination/Ground Investigation Report – produced by Tier Environmental Ltd
- Daylight and Sunlight Report - produced by Consil
- Ecological Appraisal – produced by Bowland Ecology
- BREEAM Pre-Assessment Report and Assessment Report and Energy & Sustainability Statement – produced by Consolux Sustainability Ltd
- Flood Risk Statement and Drainage Strategy – produced by Jubb Consulting Engineers
- Heritage Statement – produced by RPS
- Noise Assessment – Ambient Noise and Building Envelope Assessment - produced by PDA Acoustic Consultants
- Transport Statement and (Framework) Travel Plan – produced by ADL Traffic & Highways Engineering Ltd
- Arboricultural Appraisal, including Tree Stock Appraisal, Arboricultural Impact Assessment, Tree Protection Statement, Tree Survey Tables, Tree Location Plan and Tree Constraints Plan - produced by Advanced Arboriculture



ARCHAEOLOGY

- 6.3 An Archaeological Desk Based Assessment (DBA) has been undertaken by RPS Group to clarify the archaeological potential of the application site. The DBA comprises an examination of evidence on the Devon Historic Environment Record (HER) and other relevant sources and consultations have been undertaken with Exeter City HER.
- 6.4 The DBA contains a review of potential development impacts on archaeological assets. The conclusions are:
- There are no designated or non-designated archaeological assets recorded on the study site.
 - The site is considered to have a low to moderate archaeological potential for Roman evidence and a low archaeological potential for Prehistoric or Medieval evidence. Features associated with Post-Medieval agricultural activity and evidence of 19th century nursery structures could be present.
 - Any remains, should they occur on site, would most likely just be of local significance.
 - It is considered unlikely that the redevelopment of the study site would either have a significant or widespread below ground archaeological impact.
- 6.5 The overall conclusion of the DBA is that any archaeological matters could be dealt with satisfactorily with an appropriately worded planning condition.
- 6.6 Please refer to RPS Group's Archaeological Desk Based Assessment for full details.

AIR QUALITY

- 6.7 Redmore Environmental Ltd was commissioned by the applicant to undertake an Air Quality Assessment in support of the planning application. One Air Quality Management Area has been declared in Exeter, which is approximately 75m to the south of the application site. An Air Quality Assessment was therefore required in order to determine baseline conditions, assess potential impacts as a result of the scheme and consider the



proposed development's suitability for the proposed use. The relevant Local Plan policies (i.e. CP11, EN1 and EN3) were considered as part of the Assessment, as were the relevant paragraphs of the NPPF.

- 6.8 The Assessment covers both the construction and operation stages of the development.
- 6.9 The Construction Phase Assessment covers the demolition, earthworks, construction and trackout stages of the development. The Assessment concludes that there is the potential for air quality impacts as a result of dust emissions from the site. Therefore, Table 18 within the Assessment provides out a number of mitigation measures to reduce impacts as a result of dust emissions during the construction phase, which have been specifically tailored for the application site/proposed development. These measures are incorporated in the Construction Management Plan, which is submitted as part of this application. Providing these measures are implemented, the potential air quality impacts from dust generated during the construction state is predicted to be not significant.
- 6.10 The Operational Phase Assessment considers potential development impacts, which in this case relate to any vehicle movements associated with the development, and the potential future exposure of new residents into an area of poorer air quality. Due to the low number of vehicle trips anticipated to be produced by the proposed development (which has been designed to be car-free), negligible impacts were predicted. Furthermore, the assessment concluded that the site is suitable for a residential use from an air quality perspective.
- 6.11 The overall conclusions, based on the assessment results, are that air quality issues are not considered to be a constraint to the proposed redevelopment and the site is considered suitable for the proposed use from an air quality perspective.

CONTAMINATION

- 6.12 A Ground Investigation Report has been provided by Tier Environmental Ltd.
- 6.13 The ground investigation took place in May 2019 and comprised the excavation of 13 hand excavated pits to obtain samples for environmental and geotechnical laboratory



analysis, advancing 13 boreholes for geotechnical testing and installing wells to monitor gas and groundwater.

6.14 The conclusions of the investigation are that conditions are typical for a brownfield site with historic and current storage of hydrocarbons. Tier Environmental is satisfied that the criteria of development plan Policy EN2 are met and the site can be redeveloped to provide student accommodation, providing a number of recommended remediation actions and mitigation measures are implemented. These are:

- A 600mm clean cover system (comprising clean imported soil overlying a high visibility geotextile membrane) will be required in soft landscaped areas.
- The existing fuel storage tanks and interceptors will require decommissioning and removal prior to the commencement of the redevelopment works. Any hydrocarbon impacted soils and perched groundwater will also require removal and treatment/disposal at a suitably licensed facility.
- Ground gas protection measures will be required, potentially including a hydrocarbon/volatile resistant membrane.

6.15 The applicant is willing to commit to these measures with an appropriately worded planning condition/s.

6.16 The investigation concludes that, in accordance with Policy EN2, the remediation and mitigation measures would ensure that the proposed development would not:

- Expose the occupiers of the development and neighbouring land uses to unacceptable risk;
- Threaten the structural integrity of any building built, or to be built, on or adjoining the site;
- Lead to the contamination of any watercourse, water body or aquifer;



- Cause the contamination of adjoining land or allow such contamination to continue.

6.17 Please refer to the Preliminary Risk Assessment/Ground Investigation Report and the Non-Technical Summary document for full details.

DAYLIGHT AND SUNLIGHT

6.18 A Daylight and Sunlight Report has been provided by Consil, which analyses the effect the proposed development would have on the daylight and sunlight amenity to the neighbouring residential properties i.e. 1-8 St. Matthews Close, 35-51 (odd numbers) Sandford Walk and 1 Gladstone Road. The report considers daylight and sunlight amenity to all relevant windows plus overshadowing to the rear courtyards of the Sandford Walk properties against the relevant BRE guidelines (which Consil highlights are provided for guidance purposes only and are not intended to be interpreted as a strict set of rules).

6.19 The Report concludes that for sunlight amenity, all windows covered in the assessment would meet the BRE Report guidance for annual sunlight (with only a small number of minor breaches for winter sun).

6.20 In terms of daylight amenity, the Report concludes that all the windows to the flats within St. Matthews Close would meet the guidance, as would the vast majority of the houses on Sandford Walk. The Report does identify some breaches of the guidelines but emphasises a number of points that are highly relevant when interpreting the results, which include:

- Most of the windows currently receive uncharacteristically high levels of daylight, meaning that any reduction needs to be considered in relation to the existing value, the quantum of light loss and retained value.
- Whilst some occupiers would experience change in the amount of daylight received, the retained levels of daylight would be entirely commensurate for a semi-urban location such as this.



- Some windows currently receive low levels of daylight and a small change in the quantum of light could result in a high percentage change in the overall daylight figure, which implies a significant change in light levels whereas the difference is often actually relatively small.

6.21 The Report goes on to conclude that whilst most of the rear courtyards on Sandford Walk would experience a reduction in the amount of sunlight received in spring and autumn, the actual area receiving less sunlight is relatively small. Furthermore, in the summer when the gardens are more likely to be used frequently there would be no change to the areas receiving two hours of sunlight (all would receive two hours of sunlight to over half the courtyard).

6.22 Overall, the Report concludes that the proposed development would not result in an unacceptable loss of daylight or sunlight and the retained levels would provide the neighbouring residents with acceptable living standards for this semi-urban location.

ECOLOGY

6.23 An Ecological Appraisal has been undertaken by Bowland Ecology and is included with the application submission. The Appraisal includes an extended Phase 1 Habitat Survey and a preliminary bat roost assessment. The purpose of these was to make an assessment of the value of the building and site for bats, identify and map all habitats within the survey area, identify the presence of or potential for wildlife interests and the need for any further surveys and identify any potential impacts of any recommendations for the proposed development.

6.24 A summary of the results of the survey and assessment is provided below:

- There are no statutory or non-statutory designated wildlife sites within 1km of the site. The site is located within an Impact Risk Zone (IRZ) for statutory designated sites. However, development of the site does not fall into any of the categories that require consultation with Natural England. Therefore, no further consideration of the IRZ is required.



- Habitat connectivity in the area is limited to scattered trees in the gardens of residential properties and there are no ponds on or within 0.25km of the site.
- The data search returned 13 records of bats in the search area. The habitats in and around the site provide low/negligible foraging and commuting opportunities for bats. The site is also heavily illuminated by adjacent street lighting and lighting around the existing buildings, further reducing the suitability for bats.
- The conclusion of the building inspection survey is that the existing buildings are considered to have low/negligible potential to support roosting bats. The Ash tree on site was also assessed as having negligible potential to support roosting bats due to the absence of any Potential Roosting Features.
- The habitats on site provide negligible potential for badger, hedgehog and other small mammals due to the lack of cover.
- There is potentially suitable nesting habitat for small passerines (including house sparrow) and or tree and shrub nesting birds.
- There are no ponds within 0.25km of the site and the terrestrial habitats on site provide negligible refuge habitat for amphibians due to the lack of cover.

6.25 The Ecological Appraisal include an assessment of potential impacts of redeveloping this site:

- Habitats – the habitats on site are of limited ecological value. Several areas of deciduous woodland Habitat of Principal Importance (HPI) were identified during the desk study, the closest being 0.62km from the site. Due to the distance and lack of connecting habitat, the redevelopment will not directly or indirectly impact the HPI.
- Bats – no evidence of roosting bats was found and the use of the existing buildings by bats is considered to be unlikely due to high levels of disturbance in



and around the building and the heavily illuminated nature of the site and surrounding area. The existing buildings' materials add to their unsuitability as roosting habitats for bats. Therefore, the potential of the buildings to support roosting bats is negligible and no further bat surveys are recommended. Any additional lighting within the site would have the potential to negatively impact foraging and commuting bats using the site, but this can be mitigated appropriately by using specified types of lighting (which could be secured by way of condition).

- Birds – the redevelopment proposals have the potential to result in impacts to nesting birds if works are undertaken within the nesting season (March – August). If works are to be undertaken during this time a pre-clearance bird survey would need to be carried out by a suitably experienced ecologist.

6.26 The final chapter of the Ecological Appraisal sets out a number of recommendations to mitigate the impacts of the proposed development. These are as follows:

- As a precautionary measure, demolition works should be undertaken under Reasonable Avoidance Measures (RAMs). Please refer to paragraph 5.2 of the Ecological Appraisal for details.
- Any lighting scheme should be designed to be 'bat friendly' (examples are given at paragraph 5.3).
- The removal of nesting bird habitat should take place outside of the breeding bird season (March – August). Any habitat clearance that must be carried out within the season should be subject to a pre-clearance bird survey carried out by a suitably experienced ecologist.

6.27 A number of ecological enhancement measures are included within the proposed design. Bat and bird boxes would be installed on the proposed building and trees on site.

6.28 Please refer to Bowland Ecology's Ecological Appraisal for full details.



ENERGY AND SUSTAINABILITY

6.29 An Energy and Sustainability Statement has been produced by Consolux, which details the energy efficiency and sustainability measures that are included in the design of the student accommodation building in order to reduce the energy consumption and carbon dioxide emissions associated with the development. This site energy targets will be achieved through the implementation of the Energy Hierarchy:

- Be Lean – reduce the demand for energy within the building
- Be Clean – supply energy efficiently
- Be Green – use renewable energy.

6.30 It is proposed that the proposed development would use Combined Heat and Power (CHP) and boilers as a main source of heat for hot water.

6.31 Renewable energy and low carbon/zero carbon technologies are highlighted which will provide a very energy and water efficient development, as required by Core Strategy Policy 15.

6.32 The stand-alone BREEAM Pre-Assessment Report and the Assessment Report show that once built, the scheme would be able to achieve a BREEAM Excellent rating and would thus adhere to the requirements of Core Strategy Policies CP15 and 17. The development could be 'connection ready.'

FLOOD RISK AND DRAINAGE

6.33 A Flood Risk Statement and a Drainage Strategy have been provided by Jubb Consulting Engineers.

6.34 The Flood Statement confirms that the application site lies within Flood Zone 1 – an area with a low probability of flooding. The application site is not indicated to be at risk of surface water flooding, flooding from reservoirs or risk of fluvial or coastal/tidal flooding. In conclusion, the site is not located in within an area known or predicted to flood and the proposed development is not at an adverse risk of flooding.



6.35 The Drainage Strategy details the strategy for the scheme in terms of surface water and foul drainage.

Surface Water

6.36 As per the existing arrangement, it is proposed that surface water would discharge to the SWW sewer serving the existing site. Attenuation would be provided on-site by way of a geocellular tank, which would reduce existing discharge flow rates. Run-off from roadways, footpaths and the proposed building would be conveyed by traditional gullies and line drains and collected in chambers before entering the attenuation tank.

Foul Water

6.37 It is proposed that foul water would also discharge to an existing sewer network in Gladstone Road and St. Matthew's Close.

6.38 Please refer to the Drainage Strategy and the Drainage Strategy drawing (Appendix 3 of Jubb Consulting Engineers' document) for full details of the existing network and proposed strategies.

HERITAGE

6.39 A Built Heritage Statement has been produced by RPS to assess the potential impacts of the proposed development on nearby built heritage assets.

6.40 The application site does not contain any designated or non-designated heritage assets and does not lie within a conservation area. The site does, however, form part of the setting of two conservation areas (Mont le Grand and St Leonards), albeit it does not contribute to their significance, and the proposed development has been considered accordingly.

6.41 The assessment concludes that the proposed redevelopment would introduce additional height, but would not change the existing character of the heritage assets' settings or the ability to experience and appreciate their significance. The proposed redevelopment would therefore preserve the significance of these heritage assets in accordance with section 72 of the 1990 Act, the NPPF and Save Local Plan Policy C1.



6.42 Please refer to the Built Heritage Statement produced by RPS for full details.

NOISE

- 6.43 The applicant commissioned PDA Acoustic Consultants to undertake an Ambient Noise and Building Envelope Assessment of the proposed development (a copy of the Assessment is included with the application submission). The Assessment covers the Environmental Health points provided via email by the case officer on 8th July 2019 i.e. *“a noise assessment will also be required for plant which may be intended to be operated from the site. Also potential noise from neighbouring operations including Police Station and Waitrose (e.g. loading and unloading) and their potential impact on occupiers of the proposed development and any necessary mitigation.”*
- 6.44 A noise level survey was undertaken by PDA in the vicinity of the application site to determine the existing noise climate. The requests of Environmental Health have been accounted for in the measurements. The survey was undertaken over a period of approximately 21 hours, during which time, police vehicles with sirens were observed passing the site and distant sirens were audible frequently. In addition, measurement position 1 overlooks the Waitrose delivery bay and is representative of the closest point on the facade relative to the delivery bay.
- 6.45 PDA concluded that the noise levels recorded mean that the application site is suitable for residential development from a noise perspective, taking into account noise from local road traffic, noise due to the police station and from Waitrose, and acceptable internal noise levels can be achieved provided that adequate acoustic attenuation is provided to habitable areas. Mitigation measures are provided, based on a number of design assumptions. Minimum requirements are provided for the scheme’s glazing and ventilators and for the building façade elements that would be required to achieve internal noise level requirements, which have all been adhered to in the proposed scheme design.
- 6.46 The Assessment also considers noise levels in the external amenity areas. The results of the noise model produced by PDA indicate that the noise level in the courtyard area would be below the national guideline value.



- 6.47 As the calculations demonstrate that the relevant national criteria (of BS8233:2014) and WHO Guidelines can be achieved both within the proposed accommodation and in the external courtyard area, PDA Acoustic Consultants conclude that the site is suitable for a residential development from a noise perspective.

TRANSPORT

- 6.48 A Transport Statement (TS) has been produced by ADL Traffic & Highways Engineering Ltd.
- 6.49 The TS examines the accessibility of the proposed development to non-car modes of travel, including pedestrians, cyclists and public transport users. Overall, the accessibility is considered to be excellent. The nearest bus stop is located approximately 160m from the site entrance and Exeter Bus Station is located approximately 600m from the site.
- 6.50 The TS includes information from the TRICs database, which has been used to calculate the traffic generation for the proposed development. The data suggests that the majority of trips generated by the development would be pedestrian trips.
- 6.51 The TS also assesses the traffic impact of the proposals compared to the ambulance station use of the site and demonstrates that the existing use generates greater levels of traffic than the proposed development would (30 fewer trips per day would be created by the proposed development i.e. 10 two-way trips per day, against the ambulance station's 40). The development would, therefore, have no impact on the capacity or safety of the local road network. As a result, the TS concludes that there is no requirement for off-site highway improvements for the purposes of addressing any vehicular impact.
- 6.52 Section 6 of the TS sets out a number of factors that promote a 'car free' development. Factors include the site's proximity to many local facilities, no on-site parking provision and residents not being eligible for residential parking permits (secured through car-free tenancy agreements), the development would provide a new pedestrian crossing over Gladstone Road and the implementation of a Travel Plan.



- 6.53 Overall, the TS concludes that the proposed development is acceptable in terms of its transport impact and there are no justifiable highways reasons for refusal.
- 6.54 ADL has also produced a Framework Travel Plan (FTP) for the proposed scheme, which aims to:
- Reduce car dependency and, in particular, the number of single occupancy vehicle journeys;
 - Increase travel choice for staff and students;
 - Promote opportunities for access by non-car modes for staff and students;
 - Encourage students and staff to walk and cycle;
- 6.55 The FTP includes hard measures, such as provision of secure cycle parking (84 spaces), a new pedestrian crossing over Gladstone Road, towards Waitrose, well maintained and lit accesses, dropped kerbs and paving at access points to assist pedestrian movements where they potential conflict with vehicles and no on-site parking provision.
- 6.56 Soft measures, which are written measures to assist with the future execution of the travel plan, could include provision of information about and directions to public transport services, advertisements on the health benefits of walking to work or place of study, bicycle puncture repair facilities available on the premises and providing details of local taxi firms on an information board.
- 6.57 The management company would be responsible for the travel plan and appointing a travel plan coordinator, who would be in charge of reviewing and monitoring the plan on an annual basis.
- 6.58 The final travel plan could be secured by way of planning condition.
- 6.59 The implementation of the travel plan is seen by the applicant as a positive initiative to provide travel choice and to enhance, where appropriate, the accessibility of the site for



its students, staff and visitors. The Travel Plan would make a positive contribution to reducing the need to travel by private car to and from the development.

- 6.60 Please refer to the Framework Travel Plan, produced by ADL Traffic & Highways Engineering Ltd, for full details.

TREES

- 6.61 Advanced Arboriculture was commissioned by the applicant to carry out an arboricultural appraisal of the site. An Arboricultural Appraisal report (dated 27th September 2019) is included with the application submission and contains a Tree Stock Appraisal, Arboricultural Impact Assessment and Tree Protection Statement. Tree survey tables plus a Tree Location Plan and a Tree Constraints Plan are attached to the Appraisal.
- 6.62 The Tree Survey was carried out in September 2019. The survey assesses four existing trees and a small tree group adjacent to the St Matthews Close boundary. Of these, only one individual tree (Ash T1) and the tree group are located within the application site area.
- 6.63 The most significant arboricultural feature on the site is identified as being Ash T1. Having properly assessed this tree, Advanced Arboriculture (AA) concludes that this tree is in decline judging by its crown (and probable reasons for the decline are set out on page 2 of the Appraisal). The decline is seen through a *'combination of deadwood throughout the crown, a lower crown density than would be expected of a healthy specimen, considerable secondary foliage sprouting from major limbs, and chlorotic foliage, particularly on the northern side of the lower crown.'* AA also identifies that the crown of the tree sits very low over both the car park to the south of the site and over Gladstone Road (contravening the Highways Regulations). Importantly, the survey also reports that, based on evidence observed across Devon, it is almost inevitable that this tree will succumb to Ash Dieback Disease in the near future (within the next five years). Overall, AA does not consider Ash to be an appropriate species for this constrained urban environment.



- 6.64 The Arboricultural Appraisal explains that a Tree Preservation Order was served on Ash T1 on 20th August 2019. This is despite the Arboricultural Officer's advice to case officer in June 2019, which was that:

"It's a large Ash tree, that while being very prominent, it has an indifferent form. The tree has not been pruned for many years and now requires crown lifting over the highway and adjacent buildings. There is also possible root damage to adjacent hard surfaces. Once the tree has been pruned the contribution to the visual amenity of the area will be reduced. There are some very attractive trees on the opposite side of the road. Should the tree be retained it will be a significant constraint to the site. In general I consider we could lose the tree provided we can achieve some tree planting fronting the highway, and provided the proposed development is of a high standard. In summary I consider the making of a tree preservation order to protect the tree is not considered appropriate."

- 6.65 Furthermore, a supporting note on the Tree Preservation Order file states that: *"The tree preservation order is not designed to be a constraint on development but to allow trees to be considered as part of any future development proposal."* Advanced Arboriculture considers it to be reasonable, therefore, to conclude that the limited safe useful life expectancy of this tree has been recognised by Exeter City Council, with an expectation that the tree's loss be addressed by the provision of new tree plantings which are of a suitable scale and appearance to maintain the long term visual amenity value of the local landscape. A formal objection to the serving of the TPO was made to Exeter City Council on 16th September 2019 – a copy is included as **Appendix 1**.

- 6.66 The conclusion of the Tree Stock Appraisal is that the tree is not worthy of retention in the context of development. Furthermore, as is demonstrated in Section 5 of the Design & Access Statement, it is important to note that retaining the tree would have a significant impact on the developable area of the site. Retaining the tree would result in a loss of 15% of buildable footprint per floor and around 25% of bedrooms (35 bedrooms) and amenity space. This would significantly affect the viability of the scheme



and the ability to deliver a development that makes the most efficient use of this sustainable brownfield site close to the city centre.

- 6.67 The Arboricultural Impact Assessment (AIA) states that arboricultural constraints on and immediately adjacent to the site are negligible, with Ash T1 not being considered worthy of long-term retention due to its existing condition and its almost inevitable susceptibility to Ash Dieback Disease. Similarly, the two trees which comprise group G1 are also low-quality specimens not worthy of retention in the context of any development of the site. To mitigate the loss of the Ash tree and provide betterment to the immediate street scene, the landscaping strategy for the Gladstone Road frontage incorporates three new trees: one Small-leaved Lime and two Liquidambars – both chosen as they should thrive in this location. The AIA provides advice on how to maximise the volume of high-quality soil available for these trees. AA has discussed the proposed replacement tree planting with Exeter City Council’s Arboricultural Officer (Mark Waddams), who supports the proposals, subject to all planting stock being containerized and being inspected for quality on delivery (which the applicant is willing to commit to). The Council’s Arboricultural Officer is also satisfied that the trees proposed are suitable for the space available, with room for future growth.
- 6.68 In terms of shading or perceived dominance, the AIA concludes that the shade path for Lime T3 would not have any significant impact on any living spaces, even as the tree grows. Furthermore, this tree would provide some screening of the police building to the south. The AIA concludes that the replacement trees would tolerate pruning well and any trimming back deemed necessary could be undertaken on a three to five year cycle with negligible risk of harm. Overall, the AIA concludes that the proposed layout is sustainable from an arboricultural point of view, subject to appropriate care being taken during construction.
- 6.69 The Arboricultural Appraisal contains a Tree Protection Statement, which includes some general considerations, craning activities, services, new tree planting and a tree works schedule.



6.70 Advanced Arboriculture's overall conclusion is that the proposals are considered to be sustainable from an arboricultural point of view, subject to the planting of the three new trees on the Gladstone Road frontage (as detailed in the Landscape Design Statement and Landscape Layout Plan).



7 JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

THE PROPOSED DEVELOPMENT IS IN ACCORDANCE WITH THE RELEVANT DEVELOPMENT PLAN POLICIES

7.1 Applications for development are made in accordance with the development plan unless material considerations show otherwise – S38(6) of the Act. The relevant development plan documents for this area are:

- Core Strategy 2012
- Exeter City Local Plan 2005 – saved policies

Core Strategy Policy CP5

7.2 The strategic policy for the area is set out in the adopted Core Strategy. The Core Strategy policy in relation to the housing needs of all the population is Policy CP5. Policy CP5 indicates that all members of the community should have a suitable supply of housing including, inter alia, purpose-built student accommodation. The text with the policy explains that the growth of the University is important to the future prosperity of the city and that the growth in student numbers to 2025/26 is around 3,300. The University's aim is to accommodate the students in purpose-built accommodation.

7.3 This application involves a brownfield urban site, just 180m (approx.) from the university's St. Luke's Campus, being used to help the internationally recognised university meet its growth and student housing needs (which would help to maintain the prosperity of the city), within a purpose-built student accommodation proposal which meets the strategic policy of the Core Strategy. The principle of the proposed development is therefore considered to be wholly compliant with the provisions of the relevant development plan policy, notably Core Strategy Policy CP5, plus the supporting guidance within the University of Exeter SPG, which highlight an on-going and growing need to provide for additional purpose-built student accommodation in sustainable locations which are close to the University and the city centre. Officers have endorsed this view as part of the pre-application discussions.



Core Strategy Policy CP15

- 7.4 Core Strategy Policy CP15 covers sustainable construction and requires development proposals to demonstrate how sustainable design and construction methods would be incorporated. Developments must be resilient to climate change and optimise energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials and by using technologies that reduce carbon emissions. The application submission is supported by an Energy and Sustainability Statement, dated October 2019 produced by Consolux, which details the energy efficiency and sustainability measures that are included in the design of the student accommodation building in order to reduce the energy consumption and carbon dioxide emissions associated with the development and comply with Core Strategy Policy CP15. Please refer to the Energy and Sustainability Statement for full details.
- 7.5 All non-domestic development is required to achieve BREEAM 'Excellent' standards and are expected to be zero carbon from 2019. BREEAM Pre-Assessment and Assessment Reports, produced by Consolux, are included with the application submission and demonstrate that the scheme would be able to achieve a BREEAM Excellent rating and would thus adhere to the requirements of Core Strategy Policy CP15.

CP17

- 7.6 Core Strategy Policy CP17 deals with design and local distinctiveness and 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. The Design & Access Statement and Energy and Sustainability Statement detail how the proposed development meets these requirements.

Local Plan Saved Policy H5

- 7.7 Local Plan Policy H5 is a permissive policy and can be complied with through, in part, high quality design. Locations close to the university are encouraged. Policy H5 supports the development of student housing provided that the following criteria are met:



(a) the scale and intensity of use will not harm the character of the building and locality and will not cause an unacceptable reduction in the amenity of neighbouring occupiers or result in on-street parking problems;

- 7.8 As set out in the accompanying Design & Access Statement, a lot of time has been spent developing the proposed design to reduce the height, scale and massing on all facades in order to create an appropriate relationship with the neighbouring residential properties and with the Gladstone Road frontage and ensure that there would be no harm to the character of the locality. A number of CGIs are being produced and will be included with the application submission to demonstrate how the development would look in the locality.
- 7.9 The potential impact on the amenity of neighbouring occupiers, particularly those living on Sandford Walk, has been considered in detail. Lower elements are situated to the north to reduce visual and shadowing impact on neighbouring properties and address the Residential Design Guidance in terms of separation distances. On the north facing elevation the majority of windows have been positioned at least 22 metres from any habitable rooms facing the site facing the site from Sandford Walk to protect privacy. Where the proposed building is in closer proximity to the properties on Sandford Walk, the elevations are largely blank.
- 7.10 A Daylight and Sunlight Report has been provided by Consil, which analyses the effect the proposed development would have on the daylight and sunlight amenity to the neighbouring residential properties i.e. 1-8 St. Matthews Close, 35-51 (odd numbers) Sandford Walk and 1 Gladstone Road. Overall, the Report concludes that the proposed development would not result in an unacceptable loss of daylight or sunlight and the retained levels would provide the neighbouring residents with acceptable living standards for this semi-urban location.
- 7.11 As set out in the Landscape Design Statement submitted with this application, the existing wall along the Sandford Walk boundary would be retained, with six new trees planting in front of this wall to improve the outlook from Sandford Walk.



- 7.12 The Student Management Plan submitted with this application details how student behaviour is managed to protect the amenity of neighbouring residents (please refer to page 13 of the Plan). To prevent problems of anti-social behaviour, such as noise and nuisance, and in order to protect the amenity of neighbouring residents, particularly those on Sandford Walk, the external courtyards would be closed at 10pm each night. Fresh would work closely with the university and its disciplinary procedures.
- 7.13 The proposed development would not result in on-street parking problems. As explained in the detailed Student Management Plan, the residents of the scheme would not be eligible to apply for a residents' parking permit and would be strongly discouraged from bringing a car into the city as a condition of their tenancy agreement. The car free nature of the development would be strictly upheld through the management of the development. In Fresh's experience, this is an extremely effective deterrent for car use.
- 7.14 As set out under criterion d below, the site is in an ideal location for a car free development, given its location in close proximity to Exeter University's St Luke's campus, which is on the opposite side of Heavitree Road, approximately 180m from the site, and Exeter City Centre, which is just 0.5 miles (approx.) to the west of the site. The site also benefits from excellent public transport links (the closest bus stops are located just 160m away on Heavitree Road) and is very accessible for pedestrians and cyclists.
- 7.15 There are other methods which are undertaken to promote the car free nature of student accommodation, which comprise:
- A Travel Plan - as set out in section 6 of this Statement, a Framework Travel Plan (FTP) is included with the application submission, which aims to reduce car dependency and, in particular, the number of single occupancy vehicle journeys, increase travel choice for staff and students, promote opportunities for access by non-car modes for staff and students and encourage students and staff to walk and cycle. The final Travel Plan could be secured by way of planning condition.



- Cycle Parking – the scheme would provide covered secure cycle parking facilities.

(b) the proposal will not create an over concentration of the use in any one area of the city which would change the character of the neighbourhood or create an imbalance in the local community;

7.16 The character of the surrounding area is very mixed in nature and the quality, design and massing of the surrounding buildings varies considerably. There is a real mix of land uses in this area, located around a main spine road into the city centre. Manson Architects have produced a land use block plan which demonstrates the mixed character of the local area (extract below and copy attached as **Appendix 2**).



7.17 It is recognised that there are some areas of the city that are unbalanced with regards to the amount of student accommodation, but this is not one of them (it was recognised in discussions with politicians prior to the submission of this application that this is not an area that suffers from overconcentration). Exeter City Council has made an 'Article 4 Direction' that restricts home owners within an identified area, where there is



considered to be an overconcentration of student accommodation, permitted development rights to use their property as houses in multiple occupation (HMOs). The application site is not within this area, which is an indicator that the council does not consider there to be an overconcentration of student accommodation in this location.

- 7.18 Providing one building for well-managed purpose-built student accommodation on a 0.26ha site would not create an overconcentration of student accommodation in this area which would change the character of the neighbourhood, nor would it create an imbalance in the local community. The provision of purpose-built student accommodation would actually provide the chance to improve community balance in the area by helping to halt the conversion of traditional housing to HMOs to meet the on-going demand for increased accommodation for an expanding university and to release existing student HMOs to the general housing market, which in turn would ease pressure on existing family housing.

(c) special needs housing is located close to local shops and services, community facilities and bus routes;

- 7.19 N/A.

(d) student accommodation is located so as to limit the need to travel to the campus by car."

- 7.20 As set out in paragraph 2.5, the site is in an ideal location for student accommodation, given its location in close proximity to Exeter University's St Luke's campus, which is on the opposite side of Heavitree Road, approximately 180m from the site, and Exeter City Centre, which is just 0.5 miles (approx.) to the west of the site. The Streatham Campus is just a little over 1.5 miles from the site.

- 7.21 The site benefits from excellent public transport links (the closest bus stops are located just 160m away on Heavitree Road) and there are very good services nearby.



Conclusion

- 7.22 In conclusion, it is considered that the strategic and non-strategic policies relating to meeting the needs of all of the community (including students) and purpose-built student accommodation, which are permissive policies, are complied with.
- 7.23 Whilst the applicant considers that both strategic and non-strategic policies are complied with, in the event that the local planning authority does not agree that all the various criteria are met it can, in line with Section 38(6) of the Act, move on to consider if ‘other material considerations’ indicate that, despite not conforming totally with policy, these are sufficient to outweigh any harm to policy and therefore to allow the development to go forward. There are a number of key material considerations in this case.

THERE IS CONSIDERABLE AND ON-GOING NEED FOR ADDITIONAL STUDENT ACCOMMODATION IN EXETER

- 7.24 There is considerable and on-going need for purpose-built student accommodation in Exeter. The need to provide more of this type of accommodation within Exeter is reflected in the Council’s adopted development plan, including paragraph 6.28 and Policy CP5 of the adopted Core Strategy, and the Council’s Supplementary Planning Guidance for development related to the University of Exeter (June 2007).
- 7.25 Paragraph 6.28 of the Core Strategy states that the University had 12,929 full-time students living away from home in 2010/11 and envisages that it will have approximately 3,300 additional full-time, living away from home students by 2025/26. The University’s aim to provide housing for all full-time students who want it is supported because it will ease pressure on existing family housing. The Core Strategy states that 75% or more of additional student numbers should be accommodated in purpose-built student housing (the findings of a draft report on accommodating the future growth of students in Exeter, commissioned by Exeter City Council, suggest that the local authority is far from meeting this target – please refer to paragraph 7.28 below and **Appendix 3**). New purpose-built student housing should be located on, or close to,



the university campuses, at sustainable locations at or near to major transport routes, or in the city centre, which the proposed scheme is.

- 7.26 The Exeter Strategic Housing Market Assessment (SHMA) addresses housing issues and establishes objectively assessed housing need in the local planning authority areas of Exeter, East Devon, Mid Devon and Teignbridge. The latest SHMA was published in March 2015. Section 12 examines the housing needs of students (specifically related to Exeter University). The SHMA identifies that, at the time of writing, there were approximately 19,300 students at Exeter University as a whole, 17,500 of whom were based in Exeter. On ‘future student growth’, the SHMA refers to the Exeter University Strategic Plan’s aspiration for growth up to 20,000 students by 2020 (the university projections suggested potential total growth to approximately 22,000 students in 2020/21). Of these, it is said that nearly 20,000 would study at the campuses in Exeter.
- 7.27 The Higher Education Statistics Agency (HESA) is the expert in UK higher education data and analysis and has published the number of student enrolments for the academic year 2017/2018. According to the data (which can be found at <https://www.hesa.ac.uk/news/17-01-2019/sb252-higher-education-student-statistics/location>) 24,045 students were enrolled at Exeter University in the 2017/2018 academic year. As set out above, paragraph 6.28 of the Core Strategy states that the University had 12,929 full-time students living away from home in 2010/11 and envisages that it will have approximately 3,300 additional full-time, living away from home students by 2025/26 i.e. 16,229 students by 2025/2026. Whilst this is not a direct comparison as the HESA figures cover the number of students enrolled, not just those living away from home, it clearly suggests that the Core Strategy growth figures published over seven years ago (in April 2012) are very unrealistic and do not reflect the actual growth of the University.
- 7.28 In July 2018, Exeter City Council commissioned a professor of Loughborough University to produce a report on ‘*The Options and Implications for Accommodating the Future Growth of Students in Exeter*’ Whilst not finalised, the draft report presents a clear



indication of the direction of travel. A copy of the draft report is attached as

Appendix 3. Key findings of the report are as follows:

- *“It is likely that the student population of Exeter will increase in the future, bringing multiple social, economic and cultural benefits to the city. Purpose Built Student Accommodation (PBSA) is the most effective way of addressing the housing implications of this continued growth in the student population.”*
- *“The city should adopt an ambitious target of 75% of the student population (that require dedicated term-time student accommodation) residing within on- or off-campus PBSA by 2030..... This would require an additional development of 4,150 bed spaces in PBSA (on top of the 3,600 bedspaces that will be added between 2018-2020).”*
- *“In a shorter term, the city should aim for 65% of the student population (that require dedicated term-time student accommodation) residing within on- or off-campus PBSA by 2021. This would require an additional development of 1,400 bed spaces in PBSA to be developed before 2021 (on top of the 3,600 bedspaces that will be added between 2018-2020).”*

7.29 Section 4 of the report covers the growth of student populations in Exeter. The data used is based on the following assumptions: i) that student populations will increase by 0.6% per annum between 2022 and 2030, and ii) the percentage of total student population seeking accommodation is 94% of the total population. The results are compelling. Figures 2 and 3 on page 6 consider how the growth of the student population will impact on the total number and proportions of students residing in PBSA and off-campus housing (excluding PBSA), if there was no post-2021 developments of new PBSA. The conclusion is that, in essence, this would place a fuller reliance on the supply of off-campus housing (excluding PBSA) to accommodate the increasing student population in Exeter. The quantitative results are as follows:

“It is striking that by 2030, 9,406 students would need to be accommodated in off-campus housing (excluding PBSA) if no additional PBSA development were built post-



2018; an increase of 3,076 students residing in off-campus housing (excluding PBSA) from the 2006 baseline total of 6,328. Using the yardstick of an average of 3 students co-residing within off-campus housing, this would mean a possible increased demand of 1,026 off-campus (dwelling) houses for student housing in the city.”

7.30 The report clearly demonstrates that importance of new developments of PBSA to accommodate the increasing student population and mitigate against the possible proliferation of off-campus student housing (excluding PBSA).

7.31 The need for additional purpose-built student accommodation has also been covered in recent committee reports for other student accommodation schemes in Exeter. The committee report for the Honiton Inn scheme on Paris Street (ref. 16/1210/FUL) states that:

“ Whilst a number of objections have raised concern regarding the need for additional purpose built student accommodation in the city, the University's plans for growth means that significantly more additional bedrooms will still be needed and therefore opportunities for new purpose built accommodation should be welcomed on appropriate sites.”

7.32 This is an appropriate site i.e. it is brownfield and in very close proximity to Exeter University and the city centre.

7.33 Most recently, the committee report for planning application 19/0560/FUL addresses need, stating under ‘Observations’ that:

“...the University’s plans for growth means that significantly more additional bedrooms will still be needed and therefore opportunities for new purpose built accommodation should be welcomed on appropriate sites.Indeed it is considered that accommodating more students throughout the city in purpose built student accommodation provides a greater opportunity for effective management of student residents to address real and perceived problems associated with student behaviour.”



- 7.34 The St Luke's campus of Exeter University is experiencing substantial growth. According to information on Exeter University's website (<https://www.exeter.ac.uk/about/facts/facts/#a2>), the campus had 3,012 students in the academic year 2018/19 (rising from 2,159 in the academic year 2014/15). The University accommodation office has advised the Watkin Jones Group that St. Luke's Campus is less well served than the main campus in terms of student accommodation.
- 7.35 It is recognised that there has been a significant increase in purpose-built student accommodation in Exeter over the last few years, but this has only responded to the increase in student numbers, meaning that the number of student HMOs has stayed virtually static. Additional purpose-built student accommodation developments are needed to halt the conversion of traditional housing stock to student HMOs and, over time, reverse the trend i.e. return traditional housing stock to the open market/family housing.

THE APPLICATION SITE IS A BROWNFIELD SITE IN A VERY SUSTAINABLE LOCATION

- 7.36 The National Planning Policy Framework (NPPF) (February 2019) sets out the Government's planning policies for England. Although not development plan policy, it represents important guidance which sets out the Government's approach towards planning for new development. As such, it is an important material consideration. Section 11 of the NPPF on 'making effective use of land' states that planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs' (paragraph 118c).
- 7.37 As set out above, the application site is located in very close proximity to Exeter City Centre (approximately 0.5km away), just off a main spine road (Heavitree Road). Exeter University's St Luke's Campus is only 180 metres (approx.) from the site and the site is very well served by local facilities, with a Waitrose foodstore directly opposite and bus stops just 160 metres from the site on Heavitree Road. The sustainability of the location mean that the site is ideal for a car free redevelopment.

THE SCHEME HAS BEEN DESIGNED TO A HIGH QUALITY AND WOULD RESULT IN A VISUAL IMPROVEMENT TO THE SITE AND IMMEDIATE AREA



- 7.38 The proposed development seeks to redevelop a site situated very near to the city centre which currently accommodates a large warehouse style building with a functional, utilitarian appearance, with very little character.
- 7.39 The overall design concept is considered to be appropriate for this mixed character area. The use of a contemporary design approach, which includes high quality materials, is considered appropriate and one which, along with the strong landscaping buffer and replacement tree planting, would result in an improvement to the visual appearance of the site and immediate area.
- 7.40 As set out above, the scheme incorporates high levels of sustainable design and would be able to achieve a BREEAM excellent rating.
- 7.41 Drop-off, servicing and refuse storage requirements can all be met – please refer to the Student Management Plan included with the application submission.

THE SCHEME WOULD PROVIDE LOCAL BENEFITS

- 7.42 The scheme would provide local economic, social and environmental benefits, as has been demonstrated with the many purpose-built student accommodation schemes that the Watkin Jones Group has delivered across the UK.

Economic Benefits

The Proposed Development Would Help To Support The Continuing Growth Of The University, Which Is Important To The Future Prosperity Of The City

- 7.43 The University of Exeter has maintained its position in the top 10% of universities over the last five years. The provision of high quality, purpose-built student accommodation would support the university, which is a key economic driver in the city and wider region. Exeter University and Exeter College are centres of educational excellence, with regional and sub-regional roles. Both are expanding. For example, there are 3,012 students in the 2018/ 19 academic year at the St Luke's campus, rising by about 50% from the 2014/ 15 academic year (2,159 students).



- 7.44 As summarised in paragraph 5.5 above, the adopted Core Strategy states that the continuing growth of the university is important to the future prosperity of Exeter. In 2010/11 there were 12,929 full-time students living away from home. It is envisaged that there will be approximately 3,300 additional full-time students, who are living away from home (i.e. in Exeter) by 2025/26.
- 7.45 It is clear that the university is very important to the economy and vitality of the city but that the growth of student number places pressure on the local community, particularly in terms of facilities, student accommodation and impact on the housing stock. Providing purpose-built housing for all full-time students who want it will ease pressure on existing family housing. According to the Core Strategy, 75% or more of additional student numbers should be accommodated in purpose-built student housing, which should be located at sustainable locations at or near to major transport routes, or in the City Centre.
- 7.46 The development proposals would help to meet the key Core Strategy challenge of accommodating university growth and comply with Core Strategy Policy CP5 by providing purpose-built student accommodation to meet the housing need in a sustainable location close to major transport routes and the city centre.

The Development would be CIL Liable

- 7.47 The proposed development is CIL liable and would result in a payment of £56.79 per square metre of new floorspace to be spent on local infrastructure and facilities. This would result in a payment of over £200,000.

Provision of Local Employment

- 7.48 Around 200 construction jobs would be created at the construction stage. Given the Watkin Jones Group's commitment to procuring locally, employing local contractors and sub-contractors where possible and appropriate, the development would provide significant investment in the city's construction sector. Opportunities for local apprenticeships, construction work placements and work experience placements would also be promoted and undertaken during the construction stage.



7.49 Additional permanent jobs would be created when the building is operational (circa. six full time jobs).

7.50 The constructors of the development (the Watkin Jones Group) and the managers/operators of the development (Fresh Student Living) would seek to utilise local employment and local procurement to maximise the economic benefit to the local area.

Local Spend Would Increase

7.51 Local businesses and facilities would be supported by increased expenditure as a result of the increased student population.

7.52 The NUS and NEF Consulting produced a document in 2013 entitled 'Student contributions to the UK economy'. This document demonstrated that students spend on average about £9,200 per annum (excluding accommodation and tuition fees) on goods and services within the locality of their student accommodation. Based on a scheme of around 170 bedspaces at Gladstone Road, this would result in students spending about £1.5m within the local area. As the report is now six years old, one can expect the numbers to have increased.

7.53 Products would be procured locally where possible.

Social Benefits

7.54 The scheme would also result in a number of social benefits. These include:

- Delivery of a use that would add to the vitality and viability of Exeter.
- Provision of much-needed purpose-built student accommodation, for which there is a clearly identified need, which would help to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations and help to halt the conversion of traditional housing to HMOs.
- 24/7 management.



- The close proximity of the application site to Exeter City Centre means that future residents would have excellent access by walking, cycling and public transport to the city's shop, services and facilities.
- The proposed development would deliver a new pedestrian crossing over Gladstone Road (from the application site towards Waitrose) and would also provide a financial contribution towards a new pedestrian crossing over Heavitree Road, towards St. Luke's Campus. Connectivity to Heavitree Road would also be improved with stepped access to St. Matthew's Close from the southern site boundary – please refer to the Proposed Ground Floor Plan and the Proposed Lower Ground Floor Plan.
- The Watkin Jones Group supports local community initiatives and operate a Community Fund, offering grants of up to £500 for local not-for-profit and voluntary groups to spend on local needs.
- The Watkin Jones Group is a 'Considerate Constructor'.

Environmental Benefits

7.55 The scheme would also result in a number of environmental benefits. These include:

- Regeneration and making effective use of an underdeveloped brownfield site in a very sustainable location, close to Exeter City Centre and Exeter University.
- High quality architecture with strong sustainability credentials (the scheme is able to achieve a BREEAM excellent rating), which would enhance the visual appearance of the site and its surroundings, make a positive contribution to the local townscape and contribute towards moving to a low carbon economy.
- Strong landscaping buffer along the Gladstone Road frontage, with tree planting suitable for and likely to thrive in this urban environment, providing betterment to the local street scene.



- Ecological enhancements, for example, bat and bird boxes would be installed on the proposed building and additional trees would be present on site.
- Car-free development, with 84 secure cycle spaces and an operational travel plan encouraging no private cars in the vicinity (residents would not be eligible for resident parking permits) and the use of public transport.

A STRONG, PROVEN MANAGEMENT PLAN WOULD BE SECURED AND ADHERED TO

7.56 The creation of purpose-built student accommodation has the benefit of ensuring that students live in a highly managed environment. The management ensures that the student accommodation is fully integrated with the function of the local area, to ensure that there are minimal and fully acceptable impacts upon residents, businesses, facilities and members of the local community. It also provides local residents and businesses with a contact point should they wish to raise any concerns.

7.57 As set out in Section 4 of this Planning Statement, the student accommodation would be managed by Fresh Student Living (Fresh), and a Student Management Plan is included as part of this application. This document sets out the key management measures that would be used once the scheme is operational to ensure the proper running of the development. The Management Plan includes a General Management Plan, a Travel Plan, a Waste and Recycling Plan and information on fire safety management.

7.58 Examples of some of the management principles employed by Fresh are set out below:

- Fresh is a member of Accreditation Network UK (ANUK). ANUK's National Code of Standards for Student Accommodation sets out a number of management principles which must be adopted and undertaken to maintain a high and 'assured' quality of student accommodation. ANUK is supported by the Department of Communities and Local Government (DCLG) and the National Union of Students (NUS), amongst others. ANUK accredits purpose-built accommodation provided both by the specialist providers within the private sector and by universities.



- As part of their agreement to reside at the scheme, students must sign an Assured Shorthold Tenancy Agreement (AST). The AST is a legal contract meaning that the ultimate recourse for contravention, although rarely required to be undertaken, is the potential suspension or termination of the agreement. Some typical terms of the AST are: the student has to be registered at a university or other higher education institution in the city and must be able to provide their UCAS number to obtain accommodation; students are strongly encouraged not to bring motorised forms of transport to the town/ city in which the student accommodation is located; and it includes a series of requirements relating to nuisance and noise, including the requirement for the scheme to be 'quiet' between 11pm and 7am.
- An accommodation manager would be responsible for the day-to-day running of the development and would address any concerns raised by residents or neighbours. Overnight management would be provided by security staff and/ or retained student wardens (mature students) who live on site to deal with any incidences which arise. All staff, including student wardens, are trained in first aid, fire management and incident management.
- In Fresh's experience, the behaviour of students is influenced by the quality of environment in which they reside. In an image-based business such as purpose-built student accommodation, a high-quality image is essential for the future lettability and success of the scheme. A good, clean and well-maintained environment is conducive to respect and appropriate behaviour from residents. CCTV is provided to supplement the presence of on-site staff, management and natural surveillance.

7.59 Adherence to the Management Plan could be secured by way of a planning condition.

7.60 Fresh has a proven track record of successfully managing purpose-built student accommodation schemes, currently managing over 16,000 student bed spaces across the UK. Management staff, security staff, and / or wardens are on hand 24 hours a day, seven days a week to address any concerns raised by occupants of the building or



members of the public and there are established management procedures for the collection and drop off of students at the beginning and end of the academic year.

GOOD LEVEL OF AMENITY FOR FUTURE RESIDENTS

- 7.61 In addition to the amenity of existing residents in the vicinity of the site, a lot of consideration has been given to the amenity of the future student residents and the provision of high-quality amenity spaces.
- 7.62 In addition to the strong landscaped buffer along Gladstone Road, two outdoor amenity spaces are proposed for the residents in the form of rear courtyard areas to the north of the proposed building plus a south western courtyard, which provides a sunnier alternative. Both would incorporate quality materials, planting, tables and seating.
- 7.63 Internally, there would be a large and inviting reception/entrance area and a large common room, which would be fitted out with an interior designer to create an inspiring and exciting usable space for the students.
- 7.64 An appropriate level of accessibility is also provided for disabled residents and visitors and 5% of the rooms would be designed to be DDA compliant.

DRAFT DEVELOPMENT DELIVERY DEVELOPMENT PLAN DOCUMENT POLICY DD12

- 7.65 The draft DPD recognises that by maximising the number of additional students accommodated in purpose-built student housing, further adverse impacts on the private housing market can be minimised. Draft Policy DD12 is a permissive policy and the proposed development meets all seven of its criteria.

CONCLUSION

- 7.66 In conclusion, it is considered that the strategic and non-strategic policies relating to meeting the needs of all of the community (including students) and purpose-built student accommodation, which are permissive policies, are complied with fully. Furthermore, there are a number of key material considerations that weigh strongly in favour of approving this application.



8 SUMMARY AND CONCLUSIONS

8.1 This Planning Statement has been produced on behalf of Gladstone Road Exeter Ltd in support of a full planning application for the redevelopment of the Ambulance Station site on Gladstone Road. The applicant is proposing the *“Demolition of existing buildings and redevelopment of site to provide purpose built student accommodation with associated accesses/ egresses, landscaping and other external works.”*

8.2 It is considered that the strategic and non-strategic policies relating to meeting the needs of all of the community (including students) and purpose-built student accommodation, which are permissive policies, are complied with. Furthermore, there are a number of key material considerations in this case that are sufficient to allow the development to go forward, namely:

- There is considerable and on-going need for additional student accommodation in Exeter.
- The application site is a brownfield site in a very sustainable location.
- The scheme has been designed to a very high quality, with strong sustainability credentials) and would result in a visual improvement to the site and immediate area.
- The scheme would provide many local benefits (economic, social and environmental).
- A strong, proven management plan would be secured and adhered to.

8.3 In conclusion, there are no planning policy or technical reasons not to approve the application. The application has significant benefits for the growth of Exeter University and Exeter's economic prosperity. For all the reasons set out in this Statement, having considered all the various matters and weighed them carefully, we hope that the Council will recognise the significant benefits, support the proposals and grant planning permission.



APPENDIX 1 – COPY OF FORMAL OBJECTION TO TREE PRESERVATION ORDER TPO666



APPENDIX 2 - LAND USE PLAN



APPENDIX 3 – DRAFT REPORT ON THE ‘OPTIONS AND IMPLICATIONS FOR ACCOMMODATING THE FUTURE GROWTH OF STUDENTS IN EXETER’