

Planning Statement

Land at Summerland Street, Exeter

McLaren (Exeter) Limited

March 2023

Turley

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Client

McLaren (Exeter) Limited

Our reference

MCLA3001

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1. Introduction

1.1 This Planning Statement has been prepared by **Turley** to accompany an application for full planning permission submitted by **McLaren (Exeter) Limited** [“McLaren”] for development of **Land at Summerland Street, Exeter** [“the site”] within the administrative area of Exeter City Council.

1.2 The description of the proposed development is as follows:

“Demolition of existing buildings and the erection of a 167 bed-space co-living development (up to 7 storeys in height) and associated works”

1.3 This Planning Statement is structured in the following order and is to be read in combination with the other submitted planning application documents:

- The Site and Context;
- Proposed Development;
- Planning Policy Context;
- Planning Assessment;
- Planning Obligations – Draft Heads of Terms; and
- Summary and Conclusions.

2. The Site and Context

The Application Site

- 2.1 The site is located off Summerland Street. It extends to approximately **0.13ha** and is within Exeter's defined City Centre. The Site is within an area identified in the existing development plan for regeneration (the Grecian Regeneration Area).
- 2.2 The site comprises former industrial buildings that are currently (or were last) in use as a café, supermarket, games arcade and windscreen repair business. There is existing access into the site off Verney Street, Summerland Street and Red Lion Lane.
- 2.3 The site is within Flood Zone 1, which has the lowest risk of flooding from fluvial and tidal sources. The designated St. Sidwells Conservation Area lies immediately to the north west of the site and a Grade II* listed building (Sidwell Street Methodist Church) lies circa 70 m north west of the site.
- 2.4 Summerland Street (immediately south west of the site) is part of a large, designated Air Quality Management Area ["AQMA"] which covers a number of key roads in and around Exeter City Centre.

Surrounding Context

- 2.5 Immediately adjoining the site to the north-west is the rear of a terrace of three storey historic properties that have active ground floor uses (barbers, takeaway and other shops) fronting onto Sidwell Street. To the north-east of the site is a relatively new 3/4 storey residential development that obtained planning permission in 2006. The south-eastern site boundary fronts Verney Street, immediately facing the site is Unit 1 (a nightclub) and north of this is a relatively newly built student accommodation scheme.
- 2.6 The south western boundary of the site is formed by Summerland Street along the opposite side of which is the former bus station site, which has now been redeveloped for student accommodation and ancillary ground floor uses ("The Depot"), following the relocation of the bus station nearby. Also across the street from the site (north of the student scheme) are existing commercial units similar to the application site (oriental supermarket, dance studio and a dry cleaners).
- 2.7 The site is very sustainably located with a large range of services and amenities including shopping and leisure/entertainment within very close proximity. The site is within walking distance of both Exeter Central train station to the west and St James Park station to the north.

Planning History

- 2.8 Exeter City Council's Online Planning Register confirms there is one key historic application of relevance. In November 2013, Full Planning Permission was granted for the redevelopment of the northern portion of the application Site to provide a five-storey building with 28 flats and retail/restaurant unit at ground floor level (re. 13/0042/FUL). This previously approved development has not been implemented. The

submitted application has comprehensively incorporated the previously approved application site with the other adjoining buildings so that a better considered comprehensive development can be proposed.

3. Proposed Development

- 3.1 The proposals comprise the comprehensive redevelopment of the site for residential use, in the form of Co-Living accommodation. The development proposals comprise:
- Demolition of existing buildings and site clearance; and
 - Redevelopment with buildings of up to 7 storeys in height, providing 167 studio bedrooms, with communal internal and external amenity space.
- 3.2 The building will be accessed from Summerland St, to the south-west. The ground floor of the proposal will include flexible communal amenity space, including:
- A Gym;
 - Co-Working Area;
 - Residents Lounge;
 - The Common Room;
 - TV Snug;
 - Cinema Room;
 - Gaming Lounge;
 - Teapoint;
 - Post Store;
 - Luggage Store;
 - Multi-Function Room.
- 3.3 Cycle parking will be located on the ground floor, with a separate access onto Verney Street. The provision is one space per unit for the first ten units and one space per two units, thereafter, totalling 90 cycle parking spaces. The bin store will also be located on the ground floor, with a separate access onto Red Lion Lane.
- 3.4 The proposal will provide a total of 167 studios. The schedule of accommodation is provided in the table 3.1 below:

Table 3.1: Proposed Schedule of Accommodation

Floor	No. of Studios	No. of Accessible Studios	TOTAL
Floor One	28	2	30
Floor Two	28	2	30
Floor Three	28	2	30
Floor Four	28	2	30
Floor Five	28	2	30
Floor Six	16	1	17
TOTAL	156	11	167

- 3.5 Each floor will have a communal kitchen, living and dining area located along the south-west elevation (fronting onto Summerland St), to be used as a shared amenity by residents. A roof terrace will be situated on the sixth floor, providing external communal amenity space. The roof terrace will include landscape features and communal seating.

Pre-Application Engagement

- 3.6 The applicant has undertaken a comprehensive programme of pre-application engagement with the Council, key stakeholders and the public. The accompanying Statement of Community Involvement [SCI] (prepared by devcomms) sets out the detail of each and a summary of the responses received. A summary of the engagement is provided below.

Formal Pre-Application Meeting

- 3.7 In December 2022, a formal pre-application meeting was held with Exeter City Council. As part of the pre-application process the scheme was also presented to the Exeter City Council Planning Members Working Group on 14 February 2023.
- 3.8 The feedback generated from this meeting was incorporated into a written pre-application response issued by Exeter City Council on the 24 February 2023.

Design Review Panel

- 3.9 McLaren presented the emerging scheme to a Design Review Panel, In January 2023 (the Exeter Design Quality Partnership Design Review Panel) who provided written advice in response to the proposals. As set out in the accompanying SCI, the comments provided included:
- Moving the previously proposed rear ground floor level amenity courtyard to a communal roof terrace to provide much improved amenity space that the panel felt would result in increased levels and duration of daylight and therefore attractiveness to occupants.
 - Reconfiguring the ground floor to be inclusive and promote communal living for all tenants throughout the scheme. The proposed changes also introduce activity to the ground floor helping to create a more vibrant and interesting street scene.
 - Developing the design to be more user led and better reflect how a tenant would live in the scheme.
 - Finessing and refining the external façade, including changing the variety of materials proposed and utilising suited brickwork.
 - Preparing formal Verified Views to demonstrate how the scheme will enhance the townscape and character of the area.

Political Engagement

- 3.10 The accompanying SCI sets out the political engagement undertaken during the pre-application process. This has included initial telephone calls and emails to the three

ward members representing the Newtown and St Leonards Ward in December 2022, and an onsite meeting with ward members on 31 January 2023.

3.11 In December 2022, initial emails providing an outline of the scheme were also issued to the relevant members of the Cabinet, including:

- Councillor Philip Bialyk – Leader of the Council
- Councillor Emma Morse – Portfolio for Planning matters

3.12 On Monday 20 February 2023, an email was issued to all members of Exeter City Council, informing them of the proposed development as well as promoting the public exhibition on Friday 3 March 2023.

Public and Key Stakeholder Engagement

3.13 The public and stakeholder pre-application engagement included the following:

- **Leaflet to Neighbours:** A leaflet was issued to local residents and business owners located in close proximity to the site. The leaflet contained information explaining the proposals as well as promoting the public exhibition events on Friday 3 March.
- **Exeter Chamber of Commerce:** A meeting was held with the Chief Executive of Exeter Chamber of Commerce on 8 February 2023.
- **In Exeter – Business Improvement District:** A meeting was held with the BID Manager of IN Exeter on 31 January 2023. Email correspondence following the meeting kept IN Exeter up to date on the proposals and public drop-in event.
- **Sidwell Methodist Church:** As identified during the pre-application and Design Review panel processes, the Sidwell Methodist Church is a prominent building on Exeter's skyline and close to the proposed site. A meeting with Reverend Julian Albrow the Treasurer to discuss the proposals was held on 8 February 2023.
- **CoBikes/CoCycles:** A meeting was held with Helen Scholes at CoCars to identify the opportunity to incorporate co bikes for hire close to the proposed site. An online meeting was held on 21 February 2023.
- **Unit 1 Nightclub - Verney Street:** Contact was made with the management of UNIT 1 nightclub in order to proactively provide details regarding noise management, such as the use of double glazing and mechanical ventilation on the side of the building facing Verney Street and Summerland Street. The manager of UNIT 1 subsequently attended the public drop-in session.

3.14 A public drop-in session was held at the site, in the vacant former windscreen repair unit, on Friday 3 March 2023. Residents were able to ask queries of the development team in attendance and were encouraged to sign an attendance register and complete a comments form, which could either be submitted on the day or returned later by post.

- 3.15 In total, sixteen people signed the exhibition register and a further eight to ten people attended and chose not to sign the register. It is therefore understood that approximately 25 people attended the drop-in event.
- 3.16 Overall, the feedback provided welcomed the principle of redeveloping this brownfield site, including understanding and support for the general concept of Co-living.

4. Planning Policy Context

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”

4.2 The Development Plan relevant to the site comprises the Core Strategy Development Plan Document (adopted February 2012) and the saved policies of the Local Plan First Review 1995-2011.

Saved Policies of the Local Plan First Review 1995-2011

4.3 Policies and Strategies within the Local Plan First Review 1995-2011 that are relevant to this planning application are summarised below:

- Policies **AP1** and **AP2** set the Local Plan strategy requiring accessibility and prioritising previously developed land within existing centres.
- Policies **H1**, **H2**, **H5** and **H7** all relate to the provision of housing giving priority to previously development land within the existing urban area and permitting residential density at the highest density that can be achieved without detriment to local amenity, and character.
- Policies **T1**, **T2**, **T3** and **T10** all relate to transport and access and require development to facilitate the most sustainable and environmentally acceptable modes of transport, providing pedestrian access for residential development to shops and schools, and maximising availability of other sustainable modes.
- Policies **EN2** and **EN5** which relate to contaminated land and noise, including consideration of noise sensitive development which may be affected by noise from existing uses.
- Policies **DG1**, **DG2**, **DG4** and **DG6** which variously consider aspects of design and energy issues, including DG4 which states that (development should):

“Be at the maximum feasible density taking into account site constraints and impact on the local area;”

Exeter Core Strategy Development Plan Document (2012)

4.4 As shown on the Council’s adopted Planning Policy Map, the Site lies within the defined City Centre and the City Centre & Grecian Regeneration Area. The Site is not allocated for any particular use within the Core Strategy [CS].

4.5 Policies and Strategies within the CS that are relevant to this planning application are summarised below:

- **Policy CP1:** Over the plan period 2006-2026 provision is made within the city, for; around 60 hectares of employment land, at least 12,000 dwellings and up to 40,000 sq metres net retail floorspace. This includes about 200 dwellings in the city centre.
- **Policy CP3:** sets out where the new housing will be delivered and states that 1,048 new homes will be delivered in the Regeneration Areas.
- **Policy CP4:** states that residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network.
- **Policy CP5:** requires development to meet the needs of all member of the community, developments of more than 10 units should include a mix of housing informed by context, local housing need and the most up to date Housing Market Assessment.
- **Policy CP9:** seeks to secure various listed major strategic transport improvements and also states that contributions necessary to ensure the delivery of transport infrastructure will be secured through the application of Policy CP18 (planning obligations).
- **Policy CP11:** states that within the Air Quality Management Area measures to reduce pollution and meet air quality objectives, that are proposed by the Local Transport Plan and the Air Quality Action Plan, will be brought forward.
- **Policy CP12:** states all development proposals must mitigate against flood risk utilising SUDS where feasible and practical.
- **Policy CP13:** where feasible and viable, all major new development should connect to any existing, or proposed, Decentralised Energy Network in the locality to bring forward low and zero carbon energy supply and distribution.
- **Policy CP14:** states new development must cut predicted CO2 emissions by the equivalent of at least 10% over and above those required to meet the building regulations current at the time of building regulations approval, unless it can be demonstrated that it would not be viable or feasible to do so.
- **Policy CP15:** requires proposals for development are expected to demonstrate how sustainable design and construction methods will be incorporated
- **Policy CP16:** supporting paragraph 10.52 confirms ecological Surveys will be required to ensure the protection of species identified, and, where necessary, financial contributions will be sought.
- **Policy CP17** sets the vision for the City Centre and Grecian Regeneration Area and seeks the following;
 - (i) enhance the city's unique historic townscape quality;

- (ii) protect the integrity of the city wall and contribute positively to the historic character of the Central and Southernhay and Friars Conservation Areas;
 - (iii) create places that encourage social interaction, utilising public art as an intrinsic component of a high quality public realm;
 - (iv) enhance and expand the city's retail function to improve Exeter's draw as a regional shopping centre;
 - (v) include residential development in a mix of uses that encourage vitality and establish a safe and secure environment;
 - (vi) create a City Centre that is vital and viable and presents a positive experience to the visitor;
 - (vii) enhance the biodiversity of the City Centre and improve the links to the green infrastructure network; and
 - (viii) contribute to the establishment of a decentralised energy network.
- **Policy CP18** – States that new development must be supported by appropriate infrastructure provided in a timely manner. Developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development.

Other Material Considerations

National Planning Policy Framework (NPPF)

- 4.6 The revised NPPF was published in July 2021 and sets out the Government's planning policies for England and how these are expected to be applied.
- 4.7 At the heart of the NPPF is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. Sustainable development includes three elements – economic, social and environmental.
- 4.8 **Paragraph 8** advises that there are three dimensions to sustainable development:
- An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.9 **Paragraph 11** identifies the NPPF’s presumption in favour of sustainable development. For decision-taking, this presumption means approving development proposals which accord with the development plan without delay and where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits; or
- Specific policies within the NPPF indicate development should be restricted.

4.10 **Paragraph 120** confirms that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

4.11 **Paragraph 124** confirms that planning policies and decisions should support development that make efficient use of land.

Planning Practice Guidance

4.12 The Planning Practice Guidance (PPG) was published in March 2014 and supports the NPPF and provides guidance on housing and economic development needs and availability assessments, the consideration and determination of planning applications, and various other technical and procedural matters, supporting the overall implementation of the policy contained within the NPPF.

Emerging Exeter Local Plan

4.13 The Council is preparing a new Exeter Local Plan. The plan is at an early stage of preparation with an ‘Outline Draft’ consultation held between September and December 2022. Adoption not anticipated until June 2024.

4.14 The draft consultation draft included the site within a proposed mixed use redevelopment area (East Gate – ref 52). A range of uses including residential continue to be anticipated, and the emerging plan continues to require the maximisation of development opportunities within the City. Draft Policy S2 states that [development will] *“Build at optimal density and maximise the development footprint, incorporating the highest densities at the most accessible and sustainable locations.”*

Supplementary Planning Documents

4.15 The following supplementary planning documents are considered to be of relevance to the proposed development and have all be considered as part of this application:

- Sustainable Transport SPD (March 2013);
- Planning Obligations SPD (April 2014); and,
- Residential Design Guide SPD (September 2010).

Five Year Housing Land Supply

4.16 The Council cannot currently demonstrate a 5 Year Housing Land Supply [5YHLS]. The most recent 5YHLS Statement was published in August 2022 and covers the five-year period from 1 April 2022 to 31 March 2027. The Statement confirms the Council has 4 Years and 10 months' supply. This amounts to a shortfall of 138 homes.

Planning Policy Summary

- Various existing and emerging local planning policies encourage the effective and efficient reuse of brownfield land within the City for housing (and in this area in particular), including delivering development at the maximum feasible density, having regard to site constraints and impacts – the application proposals respond to this policy aspiration;
- National Planning Policy includes a presumption in favour of sustainable development and requires the application of the 'tilted balance' when determining planning applications in defined circumstances – the 'tilted balance' applies to the determination of this application and so permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- Various other material considerations (such as Supplementary Planning Documents and the emerging Local Plan) support the delivery of the development as proposed.

5. Planning Assessment

- 5.1 This section provides an assessment of the proposed development with reference to the planning policy context provided in previous sections, as well as other relevant considerations.

Principle of Development

- 5.2 As this Planning Statement will demonstrate, the proposals accord with the development plan. Notwithstanding this, the Council is unable to demonstrate a 5-year housing land supply and have dated adopted development plan documents. As such, the tilted balance of NPPF paragraph 11 (d) is engaged. Overall, there are no adverse impacts that significantly outweigh the benefits and the proposals deliver sustainable development and accord with the policies of the NPPF.

Distinct Contribution to Housing Need

- 5.3 Core Strategy Policy CP1 seeks to deliver at least 12,000 dwellings within the plan period (2006-2026). This includes about 200 dwellings in the city centre. Policy CP5 supports the provision of housing to meet the needs of all members of the community.
- 5.4 This application is accompanied by a Co-Living Report prepared by JLL. The report confirms the co-living sub-sector an important role to play in the UK's rental sector going forward and is complementary to PBSA and BTR, both of which have established growing investment sectors in recent years. It provides a customer-focused modern solution for the significant proportion of the population currently living in shared environments in traditional HMOs.
- 5.5 Exeter is facing increased pressure on its housing market due to both increasing population growth and a structural undersupply of housing. The population in Exeter is forecast to continue to grow at rates above the UK average. This increase in population is met with a continued undersupply of homes in the city.
- 5.6 This increased pressure on the housing market demonstrates a need for an increase and diversification of housing in the city. A Co-living development will contribute to both of these and will help Exeter begin to address the housing needs within the city. The proposed scheme would be specifically targeted to deliver new build and high-quality rental accommodation.
- 5.7 The scheme provides an opportunity to fulfil the objectives of both policies CP1 and CP5. It will make a significant contribution to the Council's housing supply to meet the needs of all members of the community.

Efficient Use of Land

- 5.8 Core Strategy Policy CP1 states that development will be guided to the most sustainable locations, recognising the contribution to be made to growth to the City Centre. Policy DG4 states that development should be at the maximum feasible density taking into account site constraints and impact on the local area. Emerging Policy S2 states that development will be built at optimal density and maximise the development footprint, incorporating the highest densities at the most accessible and sustainable

locations. The NPPF confirms planning decisions should give substantial weight to the value of using suitable brownfield land.

- 5.9 The site comprises brownfield land within Exeter City Centre, a highly sustainable location. The site is not allocated for any particular use within the development plan. Indeed, while a portion of the site remains in active use, it is not protected within local plan policy. A significant portion of the site is not in active use and arguably the entirety of the site is underutilised.
- 5.10 The proposals represent a significant opportunity to ensure an efficient use of brownfield land by providing higher density residential development. The scheme will bring previously developed land back into efficient and active use, maximising the site's existing footprint. Indeed, the formal pre-application feedback confirms the Council consider the Site to be sustainably located brownfield site and would be considered favourably in the search sequence set out in Policy H1.
- 5.11 The proposals will therefore contribute to the Council's established housing needs, particularly within the city centre, whilst ensuring an efficient use of brownfield land. It will be of high density, maximising the site's development footprint at a significantly accessible and sustainable location.

Provision of Affordable Homes

- 5.12 The NPPF states that affordable housing should only be sought on major developments (i.e. 10 or more homes or site area of 0.5ha or more). Planning Practice Guidance on build to rent states that 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided.
- 5.13 The proposal is to provide 20% affordable homes, in the form of private rent. First priority of the homes will be for essential workers. There is recent precedent within Exeter which confirms this provision of affordable housing within co-living schemes is acceptable. Indeed, two key schemes have been brought forward through planning at Gladstone Road (19/1417/FUL) and the Harlequin Centre on Paul Street (19/1556/FUL), where both have achieved Planning Permission for Co-Living development on the basis of a requirement for S106 Planning Obligations which secure:

'20% of the dwellings to be affordable private rented with first priority to essential local workers'.

- 5.14 The two recently consented Co-Living schemes were considered appropriate uses for the city centre as they will bring vitality to the area and help support economic growth through the creation of jobs and resident/visitor expenditure. With the provision of 20% affordable homes, it is therefore considered the proposals comply with the existing precedent within the City Centre and within National Planning Policy.

Sustainability

- 5.15 Core Strategy Policy CP1 states that development will be guided to the most sustainable locations. Policy AP1 states that proposals should be located where safe and convenient access by public transport, walking and cycling is available or can be provided.

- 5.16 The site is located within the defined city centre, is well contained and surrounded by existing urban development and previously developed land. The principle of re-development to provide residential dwellings is accepted and complies with the Exeter City Council's Core Strategy.
- 5.17 Being in the city centre, the Site is within a highly sustainable location. Sidwell Street, just circa 40m to the north-west of the Site offers a wide range of retail, commercial and other services. Other services and facilities within close proximity to the site include Exeter Community Pharmacy (approximately 0.1km to the north west of the site), The Centre Exeter (a walk in NHS clinic 0.2 km miles to the north west of the site) and Sidwell's Point Leisure Centre (approximately 0.2 km miles to the south west of the site)
- 5.18 The site also benefits from frequent and convenient public transport connections. Bus stops are located on Sidwell Street, which are all within a 5-minute walk. These stops provide regular services to areas in and around Exeter (such as Digby and St Thomas). The Exeter Coach Station is also located within a 5-minute walking distance from the site, located off Paris St. The Coach Station provides regular services to Sidmouth, Newton Abbot, Honiton, Tiverton, Willand, Crediton.
- 5.19 Additionally, Exeter Central train station is located c.1km to the north west of the site. Rail services from this station provide regular routes to Exeter St David's, Exmouth, and Basingstoke. St James Park train station is also located approximately 0.6m north of the site providing connections to Exmouth, Cardiff Central, Paignton and Exeter St David's.

Management Plan

- 5.20 The specific type and form of residential development proposed high quality managed rental accommodation – accordingly a Draft Management Plan has been prepared to set out the various management measures that will apply to the operation of the development (management will be undertaken by a specialist Co Living and BTR Management Business experienced in providing professional management services to this form of residential use). The Management Company will manage the accommodation with one simple objective – to provide exceptional service to the clients whose properties they manage, and to the residents who live in them.
- 5.21 The following core management principles will apply:
- Residents have a safe and well-maintained place to live.
 - Tenancy Agreements are correctly executed and enforced.
 - Resident deposits are registered and secure.
- 5.22 The submitted Draft Management Plan covers general management matters including service delivery (staffing, tenancy management, security, maintenance, cleaning etc), travel, waste and recycling, and fire safety.

Principle of Development Conclusions

- 5.23 The principle of residential development of this site is acceptable for the following reasons:

- The proposals represent an efficient use of brownfield land which is not allocated for any particular use within the development plan. Indeed, while a portion of the site remains in active use, it is not protected within local plan policy. Therefore, the redevelopment of the Site will contribute to the wider regeneration of the surrounding area, aligning with local planning policy.
- The proposals represent an opportunity to make a significant contribution to the Council's established housing need.
- The proposals will include the provision of 20% affordable housing, with local key workers having priority.
- The proposals would concentrate new housing development within a sustainable and highly accessible location.
- The Council is unable to demonstrate a 5YHLS which subsequently triggers the presumption in favour of sustainable development at paragraph 11 of the NPPF. There are no adverse impacts that outweigh the benefits of the development of this site.

5.24 Overall, the proposals will provide a high quality co-living development, situated within a sustainable and appropriate location for residential development.

Design and Layout

- 5.1 This application is accompanied by a Design and Access Statement prepared by Stride Treglown.
- 5.2 The report confirms the proposed Development has been carefully considered and developed to respond to its context, both in terms of height and massing as well as materials and architectural articulation. The appearance, materiality and architectural articulation draws inspiration from and compliments both the material palette and architecture of the surrounding heritage assets, as well as other local developments, providing a high-quality design aligned with national and local policy. It incorporates elements of red brick, decorative brick detailing, relief details and dynamic roof forms, all of which are characteristic of the conservation area and nearby listed buildings.
- 5.3 The height and massing impacts have been tested, refined and verified throughout the design process to ensure appropriate for this site and to reflect the importance of preserving the heritage assets.
- 5.4 The development would not only enhance the area and improve the main and side street environment for new residents as well as existing neighbours and users of the site; but also have a positive impact on the overall streetscape and Exeter's skyline, without adversely impacting the heritage assets. It is considered that the height and massing is an appropriate design response overall.
- 5.5 It is therefore considered the proposal is in accordance with Core Strategy **Policy CP4**.

Residential Amenity

- 5.6 As set out in detail within the submitted Design and Access Statement, future residents of the development will have access to significant communal amenity areas on the ground floor (including a Gym, Co-Working Area, Residents Lounge, The Common Room, TV Snug, Cinema Room, Gaming Lounge, Teapoint, and a Multi-Function Room). In addition to this, floors 1 to 6 will have a shared kitchen space in a centralised location.
- 5.7 The communal kitchens on floors 1-6 are designed to the same specification and the same level of facilities are provided in each, including suitable storage both under counter and above to supplement the storage already provided in a resident's studio.
- 5.8 The top floor kitchen has been designed to provide the same day-to-day cooking and dining facility but also has a larger footprint to accommodate space for internal events. This top floor kitchen allows for direct access onto the roof terrace through a set of glazed double doors which is envisaged as real focal point to this space.
- 5.9 Each studio has sufficient space for a double bed, plenty of storage, a kitchenette with all necessary cooking facilities and an ensuite pod bathroom.
- 5.10 Overall, the shared amenity space within the building has been designed to offer and quantity and quality of space that facilitates communal and disaggregated living in the building, reflecting the ethos of this purpose built shared living typology. Internally 753sqm is provided which amounts to 4.5sqm per bed space. Externally there is 170sqm, provided on a high quality roof terrace, which amounts to 1sqm per bed space.
- 5.11 It is therefore considered the proposal is in accordance with Core Strategy **Policy CP4**.

Daylight & Sunlight

- 5.12 The proposal will be up to 7 storeys in height. This application is accompanied by a Daylight and Sunlight Report prepared by Point 2 Surveyors.
- 5.13 The report confirms BRE Guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component [VSC] and No-Sky Line [NSL]. In relation to sunlight, the BRE Annual Probable Sunlight Hours [APSH] is examined. In relation to sunlight amenity to gardens and amenity spaces, the quantitative BRE overshadowing guidance is applied.
- 5.14 With regards to daylight, the assessment concludes many windows will experience BRE compliant alterations in VSC and NSL. With specific reference to the Sidwell Street properties, the windows in more constrained locations such as flank walls and / or recessed behind rear extensions, inevitably experience larger reductions. However, due to the poor existing daylight, the actual change in daylight reflects approximately 1% to 3%. It is therefore considered unnoticeable.
- 5.15 Regarding Wheaton House and Acland House, there is an overall separation distance of 20-meters. As such, the proposed development actively responds to these critical

neighbours and best protects their amenity, along with its own, whilst providing a meaningful redevelopment of the site.

- 5.16 In relation to sunlight, thirteen properties contain rooms which have a window orientated within 90° due south; nine of which will experience BRE compliant alterations in Annual Probable Sunlight Hours (APSH).
- 5.17 It is concluded that the effects of the Proposed Development in relation to daylight and sunlight amenity should be considered acceptable for the locality. The residual impacts identified within this assessment should be considered as part of the overall planning balance, alongside the various positive impacts of the development proposals.

Heritage

- 5.18 As part of the pre-application process, the impact of the development on designated heritage assets and in views within the City was identified as a key planning issue. Accordingly, this application is accompanied by a comprehensive Built Heritage and Views Appraisal, prepared by Turley, which assesses the scheme in this respect.
- 5.19 The report confirms the scheme presents an appropriate solution to optimising the Site in terms of scale, height, and massing, and introduces an architecture which will enhance the Site's contribution to the townscape character and visual amenity. Further, as demonstrated within the Views Appraisal, the proposed development would demonstrate an enhancement to the street scene and visual amenity with no adverse impacts arising to those representative views further afield.
- 5.20 With regards to the Site's heritage context, the proposed development demonstrates a sensitive approach to the significance of nearby designated heritage assets, concluding that no adverse impacts to their significance will arise as a result of proposed demolition and the introduction of the new building. The scheme would enhance the setting of the St Sidwell's Conservation Area and better define its boundary from the emerging residential character to the east.
- 5.21 Overall the submitted assessment concludes that the proposed development therefore adheres to requirements the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF (2021). The proposals are also considered to comply with relevant local policies of the Exeter Development Plan 2012 with regard to heritage assets. It also complies with local guidance set out in Exeter City Council's Core Strategy Development Plan Document (adopted February 2021).

Highways

- 5.22 This application is accompanied by a Transport Statement [TS] and Travel Plan [TP], both prepared by Advance Consulting Engineers Ltd.
- 5.23 This TS confirms that the proposed scheme will be brought forward as a car-free development. Therefore, it will not generate any additional vehicular trips onto the local / primary highway network.

- 5.24 The TS has assessed non-vehicular traffic trip generation that will arise from the proposals. It confirms that approximately one, 2-way pedestrian / cycle movement every three minutes during the network AM peak period and approximately one, 2-way pedestrian / cycle movement every four minutes during the network PM peak period. Across the daily period, the trip generation equates to approximately one, 2-way pedestrian / cycle movement every 4.5 minutes per hour.
- 5.25 The TS confirms both vehicular and non-vehicular access is provided via Summerland Street, Red Lion Lane and Verney Street. The report concludes that as the development proposals will be brought forward as a car-free development, the existing access arrangements are deemed appropriate to serve the application site. Any servicing, delivery and refuse collection will continue to be served via the loading bays onto Red Lion Lane and Verney Street respectively as well as adjacent to the site entrance point onto Summerland Street.
- 5.26 It recommends that at the T-Junctions where Red Lion Lane and Verney Street connect with Summerland Street, tactile paving is provided in order to facilitate low-risk movements of pedestrians who are visually impaired. It is also recommended that at the entrance of the application site onto Summerland Street, the single yellow line is removed, and this area is provided as a drop off / pick up area for disabled users or car club users.
- 5.27 Overall, the TS concludes the proposed development will not result in adverse impacts in terms of highway safety, access and operational capacity of the surrounding highway network in accordance with the guidelines set out within the Exeter Core Strategy and NPPF.
- 5.28 The accompanying Travel Plan sets out the measures and initiatives that will be incorporated within the proposals to encourage sustainable modes of transport. These include a Travel Information Pack, Sustainable Travel Notice Boards, Marketing, promoting walking and cycling and promoting public transport use. It confirms travel Site specific information regarding the travel patterns to and from the application site will be available post site occupation following completion of the development and through subsequent travel surveys.
- 5.29 It is therefore considered the proposed development accords with **Policy CP9** of the Core Strategy.

Ecology

- 5.30 This application is accompanied by a Bat and Bird Survey Report, prepared by Delta Simons. Bat Roost Potential (BRP) and Bird Nesting Potential (BNP) surveys were undertaken at the Site in September 2022.
- 5.31 With regards to bats, the report confirms that of the five sections of the on-Site building, one was assessed as having low potential to support roosting bats, due to supporting several gaps which may provide access into an internal cavity. However, no field signs of bat were identified. The other sections of the building complex were all assessed as having Negligible BRP.

- 5.32 With regards to birds, the roofs of the on-Site building complex are flat such that they all provide opportunities for 'ground' nesting birds, in particular gull species, known to occur in the local area. There was no access for bird species, such as feral pigeon, recorded at the time of the survey, into the building complex, nor were there any ledges externally to offer suitable nest sites. No evidence of recent bird nesting was found at the time of the survey.
- 5.33 In terms of bat and bird enhancements, the report recommends that the following nest boxes should be incorporated within the finalised development proposals:
- Six integrated swift *Apus* nest boxes;
 - Four integrated house sparrow *Passer domesticus* terrace boxes; and
 - Three integrated starling *Sturnus vulgaris* nest boxes.
- 5.34 Additionally, two integrated bat boxes should also be incorporated into the finalised development proposals in order to provide enhanced roosting opportunities for crevice dwelling species such as common and soprano pipistrelle.
- 5.35 As set out within the submitted report the existing condition of the site would be classified to have nil value within the DEFRA metric and so any biodiversity enhancements on the site cannot be attributed a % gain score. The enhancement measures proposed are appropriate and adequate to provide suitable biodiversity enhancements as part of the proposed development.
- 5.36 It is therefore considered the proposed development accords with **Policy CP16** of the Core Strategy.

Noise

- 5.37 This application is accompanied by a Noise Impact Assessment [NIA] prepared by Apex Acoustics.
- 5.38 The assessment has considered the noise impact from the nearby roads and adjacent night club. The report sets out the glazing acoustic performance requirements to achieve the indoor noise level targets. It also sets out the plant noise limits that have been determined to ensure the impact is reduced to a level where there is a low likelihood of adverse effect upon the nearest noise sensitive locations.
- 5.39 The report concludes the noise risks identified are mitigated and minimised, and the site is considered suitable for residential development.
- 5.40 It is therefore considered the proposed development accords with **Policy CP11** of the Core Strategy.

Air Quality

- 5.41 This application is accompanied by an Air Quality Assessment prepared by Apex Acoustics.

- 5.42 The report assesses the potential construction phase air quality impacts from fugitive dust emissions as a result of demolition, earthworks, construction and track out activities. The results were utilised to identify suitable mitigation for inclusion in a Construction Environmental Management Plan or similar. It is considered that the use of these good practice control measures would ensure impacts are minimised throughout construction.
- 5.43 The report confirms that during the operational phase of the development there is the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site. As the development does not include any car parking provision, road traffic exhaust impacts were not predicted to be significant. As such, the assessment concludes additional mitigation is therefore not required.
- 5.44 The report concludes that air quality issues are not considered a constraint to planning consent for the proposal.
- 5.45 It is therefore considered the proposed development accords with **Policy CP11** of the Core Strategy.

Sustainability and Energy

- 5.46 This application is accompanied by a Sustainability and Energy Statement prepared by Faithful and Gould and reflecting the core components of assessment which accompany the development – an Energy Report and BREEAM Pre-Assessment showing the achievement of a BREEAM Excellent score.
- 5.47 The BREEAM pre-assessment shows how the various categories have been considered in developing the project and how relevant credits will be secured in order to achieve a development with a BREEAM Excellent accreditation.
- 5.48 The submitted Energy Report includes an assessment of the renewable technologies that have been considered for the site. It includes commentary of which technologies are considered suitable for further development, and which have been excluded due to the site constraints and suitability for the project.
- 5.49 The report recommends the following options to be developed during the design stage:
- Air Source Heat Pump(s) (ASHPs) (air to water) for heating and hot water
 - Photovoltaic Panels (PVs)
 - Future provision for district heating connection
- 5.50 With the future provision for district heating connection, the report confirms the proposals accord with **Policy C13** of the Core Strategy.
- 5.51 The report concludes that the measures will also ensure the requirements of **Policy C14** of the Core Strategy are achieved, based on compliance with Part L 2021 of the building regulations.

- 5.52 With the incorporation of the above measures, the report confirms the proposed development achieves the Ene 01 (Reduction of energy use and carbon emissions) 'Excellent' rating minimum performance standards under the BREEAM UK New Construction Version 6.0 scheme. It is therefore considered the proposed development accords with **Policy C15** of the Core Strategy.

Flood Risk and Drainage

- 5.53 This application is accompanied by a Flood Risk Assessment and Drainage Strategy prepared by Airey & Coles.
- 5.54 With regards to flood risk, the report confirms the proposed redevelopment and associated infrastructure is located within Flood Zone 1 (low risk). As such, all anticipated flood risk mechanisms have been found to be low risk to the site.
- 5.55 With regards to surface water disposal, spatial and geo environmental constraints have ruled out the potential to dispose of surface water generated from the redevelopment by means of a soakaway(s). There is no watercourse available within the vicinity. As such, surface water from the proposals shall be attenuated on site and discharged at a restricted rate to the SWW designated surface water sewer within Verney Lane. South West Water has agreed in principle to a new connection within their response to the Point of Connection Enquiry.
- 5.56 With regards to foul water disposal, the preferred route and point of connection is to the SWW public foul sewer to the south-east of the site within Verney Street. The exact location and levels of the existing foul drainage infrastructure will need to be determined prior to laying any new drainage for connection. SWW have agreed in principle to a new connection within their response to the Point of Connection Enquiry.
- 5.57 It is therefore considered the proposed development accords with **Policy CP12** of the Core Strategy.

Ground Conditions and Contamination

- 5.58 This application is accompanied by a Preliminary Ground Investigation Report and a Detailed Unexploded Ordnance (UXO) Risk Assessment, prepared by Red Rock Geoscience.
- 5.59 The ground investigation report confirms the site is considered to be of relatively low risk to future users of the site. On the basis of the preliminary test results so far, all soils on the site can be re-used beneath proposed building footprints and hard-covered areas. However, a large area of the site has not yet had any investigation undertaken. The following works are recommended:
- It is not expected that any significant remedial measures will be required from a human health point of view or the wider environment, but further investigation is recommended in areas currently not accessible following site demolition.
 - Asbestos was not detected in any of the samples screened. However, an asbestos survey of the existing buildings is recommended prior to demolition.

- 5.60 The UXO Risk Assessment confirms the site has been subject to major post war redevelopments with the clearance of any remains of structures on site, and construction of the present-day structures. The surrounding area also appears to have been rebuilt post-war. The risk of UXO remaining is considered to be mitigated at the location of and down to the depth of any post-war redevelopment on site.
- 5.61 The report sets out the recommended mitigation measures, including a UXO Risk Management Plan and Site Specific UXO Awareness Briefings to all personnel conducting intrusive works.
- 5.62 It is therefore considered the proposed development accords with **Policy CP11** of the Core Strategy.

Archaeology

- 5.63 This application is accompanied by a Written Scheme of Archaeological Work prepared by AC archaeology.
- 5.64 It is anticipated that a pre-commencement condition may be attached to the permission requiring a written scheme of archaeological work to be submitted and approved by the Local Planning Authority [LPA], as advised by the Council's Heritage Principal Project Manager.
- 5.65 The accompanying report confirms the scheme of work will comprise some or all of the following, dependent on initial results:
- Archaeological monitoring during the removal of any ground slab or existing footings as part of the demolition phase;
 - The excavation of a series of trial trenches if the presence of surviving soil profiles is established, or if there is uncertainty whether this is the case;
 - More formal archaeological excavation if any archaeological features and deposits are present. This could be across the whole of the site or only parts if there are pockets of localised survival; and,
 - Appropriate reporting, analysis and archiving of the results of the work.
- 5.66 It is therefore considered that if planning permission be granted, a condition requiring a Written Scheme of Archaeological Work is not required in this instance.

Planning Assessment Summary

- The principle of residential development in the city and in this location is supported by policy and the application proposals represent a high-quality building to facilitate effective use of this key brownfield site;
- Visual and heritage impacts of the proposed development have been assessed in detail and overall, there is assessed to be no adverse effects on designated

heritage assets, and enhancement to the setting of the St Sidwell Conservation Area;

- All other technical development management issues have been assessed and explained within supporting application documents to demonstrate compliance with relevant local planning policy and relevant other guidance;
- The proposals would concentrate new housing development within a sustainable and highly accessible location;
- The development proposed complies with relevant development plan policies and also should be considered in the context of the presumption in favour of sustainable development, meaning that development should be approved without delay.

6. Planning Obligations – Draft Heads of Terms

- 6.1 Adopted Core Strategy Policy CP18 states that developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to support the delivery of development. Contributions will be used to mitigate the adverse impacts of development (including any cumulative impact). Where appropriate, contributions will be used to facilitate the infrastructure needed to support sustainable development.
- 6.2 The Council's Planning Obligations SPD provides an indication on the types of planning obligations that are sought in relation to new development in Exeter. The Implementing Open Spaces SPD provides benchmark figures covering the provision and maintenance of public open space facilities.
- 6.3 It is expected that the following matters will need to be covered as planning obligations as part of the scheme. It is expected that any obligations will be secured via a s.106 Agreement. The applicant would welcome discussion and confirmation of these matters as part of the determination process so that an appropriate agreement can be concluded at the earliest opportunity.
- Affordable Housing – including occupation and other provisions;
 - Road Traffic Orders to accommodate loading/unloading or other highway changes around the site;
 - Management – in accordance with an approved management plan;
 - Off-site open space and sports provision;
 - District Heating future connection;
 - Travel Plan implementation.

7. Summary and Conclusions

- 7.1 This Planning Statement has been prepared by Turley on behalf of the applicant, McLaren (Exeter) Ltd in support of a full planning application for development at of Land at Summerland Street, Exeter.
- 7.2 The application seeks to provide a 167 bed-space co-living development (up to 7 storeys in height) and associated works. This planning statement demonstrates that the proposals are in accordance with the Development Plan. Notably policies CP1, CP3, CP5, CP9, C13, C14, and C15.
- 7.3 Notwithstanding development plan compliance there are a range of material considerations which also support the grant of planning permission, including significantly the fact that the tilted balance of NPPF paragraph 11 (d) is also engaged. Even if there were perceived to be harm associated with the proposed development, the proposals will provide a number of key benefits that would outweigh any harm. These benefits include:
- (a) **Distinct Contribution to Housing Need:** Co-living development is an emerging sub-sector, offering an innovative product that contributes to local housing need and the objective of ensuring mixed and balanced communities. The product has an important role to play in the UK's rental sector going forward. It provides a customer-focused modern solution for the significant proportion of the population currently living in shared environments in traditional HMOs.
 - (b) **Efficient Use of Land:** The site is located on brownfield land, within the defined Exeter City Centre and is surrounded by existing city centre uses. The proposals therefore align with the aspirations set out in the NPPF, which confirms planning decisions should give substantial weight to the value of using suitable brownfield land.
 - (c) **Enhanced Visual Appearance:** The proposed redevelopment will significant enhance the appearance of the immediate locality and enhance the setting of identified designated heritage assets.
 - (d) **Sustainable Location:** The Site is located in a highly sustainable location with excellent connections to services and employment opportunities. The site also has convenient connections to public transport and the wider strategic highways network.
 - (e) **Affordable Housing:** The provision of affordable housing for essential key workers through the development will support wider social objectives and contribute to an established housing need.
 - (f) **Wider Economic Investment:** The development will result in 'spin off' economic benefits. Indeed, the proposed development will stimulate additional investment to the benefit of the local economy and will result in additional footfall and expenditure in the City Centre.

- (g) **Creation of Jobs:** The proposed development will also create new employment opportunities during the construction phase.
- (h) **Energy:** The scheme incorporates renewable technologies, namely Air Source Heat Pump(s) for heating and hot water, Photovoltaic Panels and a future provision for district heating connection.

Overall Conclusions

- 7.4 The proposals will provide a high quality co-living development, an innovative product that contributes to local housing need and the objective of ensuring mixed and balanced communities. The proposals are of high-quality design, with a sensitive approach to the significance of nearby designated heritage assets. It is situated within a highly sustainable and appropriate location for residential development. It is therefore considered the proposals accord with national and local policy.
- 7.5 The proposed development therefore accords with the Development Plan, the Framework and other material considerations. Planning permission should therefore be granted without delay, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

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