

Planning Statement

Proposal for Co-Living Development, Land and Buildings off Victoria Street, Exeter

Prepared For
**Shopland Gray Developments
Ltd**

9984
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CHARTERED TOWN PLANNERS

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1 INTRODUCTION

- 1.1 This Statement is submitted on behalf of Shopland Gray Developments Ltd (SGD) in support of a full planning application for the redevelopment of the vacant land and buildings off Victoria Street in central Exeter. The applicant is proposing the demolition of existing buildings and the redevelopment of the site to provide a purpose-built co-living development of 101 studio apartments plus communal space together 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 architect's drawings, the Design and Access Statement and the supporting technical information.



2 THE APPLICATION SITE AND ITS CONTEXT

The Application Site

- 2.1 The application site has an area of approximately 0.24 hectares. It is a brownfield site, comprising a large workshop style building, various areas of car parking and a large, two storey dwelling which is set within an area of grounds. The site benefits from an existing vehicular access onto Victoria Street. The whole property is disused and has a neglected character.
- 2.2 The site is not subject to any formal allocation in the Exeter development plan and is not subject to any environmental or other designations.
- 2.3 The part of the site which forms the grounds to the house contains a number of trees.

Site Location and Context

- 2.4 The site is located within a central part of the city and within an area which is overwhelmingly residential in character.



Site Location



- 2.5 The site is in an ideal location for the proposed use given its location in close proximity to the city centre which is 750m to the south-west of the site. The site therefore benefits from excellent access to a comprehensive range of services, facilities and public transport links. St James Park railway station is located 200m from the site.
- 2.6 The area is overwhelmingly residential in character, being made up of high density, Victorian housing with this type of housing adjoining the site on the three sides. The south-eastern side of the site is bounded by a railway line, beyond which lies the Exeter City Football Club stadium complex.

Planning History

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



3 PRE-APPLICATION DISCUSSIONS AND STATEMENT OF COMMUNITY INVOLVEMENT

3.1 The applicant and its representatives have been involved in detailed pre-application discussions with Exeter City Council and other key stakeholders and the proposals have been presented to two different design review panels. The scheme has therefore been the subject of extensive consultation prior to it being finalised.

Pre-Application Discussions and Design Review Panel Presentation in 2021

3.2 Pre-application discussions were carried out with officers at Exeter City Council, with these taking place in March and June 2021. In parallel with these discussions, in April 2021, a presentation was made to representatives of the South West Design Review Panel which set out proposals for development of the land. The proposals put forward envisaged a mixture of buildings on the land, of differing heights but up to a maximum of five storeys. The bulk of the scheme was proposed as being provided through the construction of a block which ran along the eastern (railway-side) part of the site.

3.3 During the pre-application and DRP process, both officers and the Panel confirmed their support for a redevelopment of the site and that, given the sustainable location and brownfield character, a high density development on the land would be appropriate, including for a co-living use. Many aspects of the design approach and the analysis which had been undertaken to support the design were supported.

3.4 As discussions progressed and the design developed, officers expressed concerns about the scale of the scheme (as then envisaged) and the potential impacts of the scheme on the amenity of the existing residential properties which adjoin the site.

Design Review Panel Presentation in 2023

3.5 Following the feedback provided by the Council and the South West DRP in 2021, SGD undertook a root-and-branch review of the scheme design which included the appointment of a new architect. As a result of this process, the scheme was completed redesigned and in March 2023, the new proposals were presented to Design West for



consideration. Alongside panel members, Council officers were in attendance at the presentation.

- 3.6 The Design West panel provided a range of comments which notably included:
- 3.6.1 That the overall orientation of the scheme should be redesigned so that the main scheme entrance should be directly onto the street in the area of the South View Terrace/Victoria Street corner. This would strengthen the design, reduce potential conflicts between residents and activities in the servicing area and improve linkages between the scheme and the surrounding area.
- 3.6.2 The scheme should be subject to a robust landscape design and consideration should be given to the inclusion of the strip of land adjacent to the railway line as part of the landscaped area. It was recommended that a dedicated landscape architect be brought onto the design team.
- 3.6.3 A full consideration of the technical issues associated with development in this location needed to be carried out to support the scheme with matters such as sunlight and daylight needing to be considered.
- 3.6.4 The scheme now proposed has amended to address the observations provided.

Statement of Community Involvement

- 3.7 In November 2022, as part of the scheme preparation, SGD consulted with the Council's members for Duryard and St James in order to seek their views on the proposals. Following an initial approach to all three ward members, a meeting was held on 25th November 2022 with Councillor Martin Pearce. Councillor Pearce was briefed on the proposals including on the pre-application discussions which taken place with officers and views were sought.
- 3.8 In addition to contact with ward members, representatives of the St James' Neighbourhood Forum were also approached, with a video meeting held with them on 5th December. Again, the opportunity was held to provide details on the scheme's evolution and to seek views.



3.9 Finally, leaflets providing details of the proposals were posted to the 50 properties in the immediate vicinity of the site with these being on South View Terrace, Victoria Street and Prospect Park.

3.10 The key points of feedback arising from the consultation process were:

3.10.1 It was acknowledged that the site was appropriate for development, given its central location and vacant use.

3.10.2 The nature of the design should be properly considered to reflect the character of the area, in relation to layout and the materials to be used.

3.10.3 There was concern that the scheme would have an impact on car parking in the area, with the development inevitably leading to an increase in parking demand. Measures should be included to ensure the scheme was genuinely zero car.

3.10.4 There was concern that the scheme would be a student housing scheme ‘by stealth’. This was of concern because of the existing over concentration of student housing in the area.



4 THE PROPOSED CO-LIVING SCHEME

4.1 Following the review and feedback described in the previous section, the proposals have been formally revised and the scheme as now proposed are set out below.

Siting and Design

4.2 The scheme proposes the construction of a co-living scheme. This would comprise three main buildings which would be connected and which would vary in height.

4.3 The South Block would abut Victoria Street and the existing short terrace of Victorian Houses. Including the Lower Ground Level, the South Block would be four storeys high. The main access for residents into the scheme would be via a pedestrian entrance provided at street level onto South View Terrace.

4.4 The Central Block would occupy the middle part of the site and would vary in height, being three storeys at its western end and four storeys on its eastern side.

4.5 The North Block would vary between three storeys (on its western side) and five storeys (on its eastern side).

4.6 The three blocks would be connected via a line of accommodation which would extend along eastern boundary of the site, close to the railway embankment. This block would vary in height but which extend to a maximum of four storeys.



View of Proposed Development

Layout of the Accommodation

- 4.7 Details of co-living as a form of accommodation and its characteristics are described in the architects Design and Access Statement.
- 4.8 A total of 101 studio apartments are proposed, with these being 20sqm in area. Each studio apartment would be self-contained, being provided with a kitchen/dining area plus ensuite bathroom accommodation.
- 4.9 As is to be expected for a co-living scheme, in addition to the apartments, a mixture of different types of communal space would be provided for use by the residents. This would be provided across the Lower Ground, Ground and First Floor Levels.
- 4.10 At the Lower Ground Floor level, a laundry would be provided for washing machines and dryers. A cycle store with capacity for 154 spaces (at 1½ spaces per studio) is also proposed at this level. Storage for waste and recycling will also be provided at this level and in order to allow ready access for collection services.



4.11 At the Ground Floor Level, the scheme proposes a large communal kitchen and dining room as well as a TV, games and social events space.

4.11.1 At the First Floor Level, a work space area is proposed.

4.11.2 External amenity spaces for residents would be provided in a range of different locations and in the form of a number of courtyard spaces at Ground Floor together with two large roof terraces provided at Second Floor Level on the eastern side of the building.

4.12 The scheme would be car free. However, some limited access for servicing vehicles will be provided from Victoria Street.

4.13 As part of the scheme a full hard and soft landscaping scheme is proposed.



5 RELEVANT PLANNING POLICY

5.1 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 Development Plan

5.2 The relevant development plan documents for this application are the:

- Exeter Core Strategy (adopted 2012);
- Exeter Local Plan (2004) Saved Policies;
- Exeter St James Neighbourhood Plan (made March 2013).

Core Strategy (2012)

5.3 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.

5.4 The stated vision for the city is set out in Section 3 of the Core Strategy:

“Exeter will embrace its role in the region as an area of growth:

- *By providing houses, jobs and infrastructure through maximising the use of previously developed land within the city...and...by maintaining a vital and viable mix of uses in the City Centre...”*

5.5 To deliver the Vision, the Core Strategy sets out a number of objectives, some of which are directly relevant to the proposals:

5.5.1 Objective 1 – to make the fullest contribution possible to the mitigation of climate change by making the best use of land by maximising the use of previously developed and encouraging high density development in the city centre



5.5.2 Objective 3 – to provide everyone in the community with the opportunity of living in a decent home by making full and efficient use of previously developed land

5.5.3 Section 9 – to raise the quality of urban living through excellence in design.

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...where possible, in accessible locations close to facilities;*
- *all housing developments should be designed to meet Lifetime Homes Standards where feasible and practical; and*

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.
- 5.13 The Local Plan establishes a number of key objectives.

Policy AP1

- 5.14 Policy AP1 requires that new development should be designed to raise the quality of the urban environment and reduce the need for car travel.

Policy AP2

- 5.15 Policy AP2 states priority will be given to meeting development needs through the use of previously developed land within existing centres.

Policy H1

- 5.16 This states that proposals for new housing will be assessed a sequential approach with the priority locations being previously developed land within the urban area.

Policy H2

- 5.17 This states that *"priority will be given to meeting housing needs on previously developed land by apply the search sequence set out in Policy H1 and by permitting residential development at the highest density than can be achieved without detriment to local amenity..."*



Policy T1

5.18 This relates to the overall approach which should be taken with regard to development and the application of Exeter’s transport strategy. It requires that development should facilitate the most sustainable and environmentally acceptable modes of transport.

The St James’ Neighbourhood Plan

5.19 The St James Neighbourhood Plan (the NP) sets out a number of objectives and policies specific to the area within which the scheme is located.

5.20 Section 5.1 of the NP sets out the Vision which is to ensure that St James is “*a vibrant community with a balanced and diverse community....It will be a great place to live and work close to the city centre and University...*”

5.21 Section 5.2 identifies a number of proposals for the area. Proposal 2 includes allowing appropriate new development in a small number of locations. Development should also “*provide for people who currently find it difficult to find appropriate accommodation in St James...*”

5.22 The NP does not identify the site as being subject to any designations or specific policies. Relevant policies within the NP are set out below.

5.23 NP Policy D1 seeks to ensure that new developments are built to a high quality of design which respects the scale and character of surrounding buildings, respects established building set-backs, uses high quality materials and provides for appropriate levels of external amenity space and storage.

5.24 NP Policy SD3 relates to infill and windfall sites. This states that small infill/windfall sites for affordable homes for local people or good quality private residential development will be supported provided the scale is complementary to adjacent properties, the scheme would achieve high standards of sustainable design and appropriate parking, access and waste storage provision is made.



Material Considerations

5.25 In addition to development plan policy, it is also necessary to have regard to various policy documents which, whilst not forming formal policy, do represent important material considerations relevant to consideration of the scheme now proposed.

Supplementary Planning Documents

Residential Design Guide Supplementary Planning Document (September 2010)

5.26 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. It should be noted that the SPD applies to consideration of new residential development and does not therefore strictly apply to proposals such as co-living schemes which are considered to be *sui generis* in nature. However, the Council has sought to apply a number of the guidelines within the SPD to the proposals and for this reason reference is made to it.

5.27 Notwithstanding its applicability or otherwise to co-living proposals, the SPD sets out a number of guidelines relating to privacy and amenity which Council officers have indicated are of relevance to the proposals. These are set out a Section 7 of the SPD.

5.28 In relation to the protection of privacy, the SPD indicates (see paragraphs 7.16 to 7.20) that a minimum distance between habitable windows of 22m should be achieved.

5.29 In relation to outlook, the SPD indicates (see paragraph 7.24 and Figure 7.5) that where habitable rooms face onto a blank wall, a minimum distance of twice the height of the wall (up to eaves height) should be achieved.

The National Planning Policy Framework (2021)

5.30 The National Planning Policy Framework (NPPF) (2021) 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.



5.31 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which should be seen as a foundation for both plan-making and decision-taking. This states that proposals that accord with up-to-date development plan should be approved “without delay”. Where the development plan is either silent or out-of-date, planning permission should only be refused where the adverse effects would *“significantly and demonstrably outweigh the benefits”*

5.32 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...

5.33 The NPPF places a considerable emphasis on the delivery of new homes and on the need to diversify the supply of housing. Paragraph 60 stresses that:

“...it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay...”



- 5.34 Paragraph 69 c) states that local authorities should support the development of windfall sites through the decisions “- *giving great weight to the benefits of using suitable sites within existing settlements for homes.*”
- 5.35 Section 11 of the NPPF places considerable emphasis on development maximising the use of brownfield land and devotes an entire section to the approach which should be taken with regard to development on this type of land.
- 5.36 Paragraph 120 states that in making decisions, local authorities should:
- 5.36.1 (Criterion c) “*...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*”.
- 5.36.2 (Criterion d) “*...promote and support the development of under-utilised land and buildings, especially if this would help to meeting identified needs for housing where land supply is constrained and available sites could be used more effectively...*”
- 5.37 The NPPF also places considerable emphasis on achieving a high quality of design. At paragraph 130, it indicates that planning decisions should ensure that developments are visually attractive, sympathetic to local character, establish/maintain a strong sense of place and optimise the potential of the site to accommodate an appropriate mix of development and creates places that are safe, inclusive and accessible.
- 5.38 Paragraph 134 indicates that permission should be refused for schemes of poor design. Criterion a) of paragraph 134 notes that “*significant weight should be given to development which reflects local design guidance and supplementary planning guidance such as design guides...*”

Outline Draft Exeter Local Plan

- 5.39 The Outline Draft Local Plan is currently out for public consultation. In due course, the policies within the draft plan will replace those in the current development plan. Although at an early stage in its development, the Outline Draft Plan does set out the Council’s likely future approach to development in city and in light of the latest guidance in the NPPF. As such, the policies in the Outline Draft represent a material consideration



of relevance to the proposed development albeit that only limited weight can be attached to them. The draft plan places a particular emphasis on the delivery of housing on brownfield land in the city and to drive high quality, sustainable development.

5.40 Policy S1 sets out the proposed future spatial approach. This indicates that the Council will:

5.40.1 seek to deliver a variety of, and sufficient number of new homes.

5.40.2 enable the development of smaller brownfield sites.

5.40.3 provide high quality development at optimal densities.

Other Guidance

5.41 As part of pre-application discussions, Council officers indicated that, in the absence of the Council having its own policy guidance on co-living developments, the scheme should be designed to address the requirements set out in the Mayor of London's guidance on co-living. This guidance is the '*Large Scale Purpose Built Shared Living*' London Planning Guidance (LPG) document which was published in draft in March 2022. Being produced for an entirely different authority area and being in draft form, this document can carry no weight for the purpose of determining this application. Nonetheless, consideration has been given by the applicant on the extent to which the scheme would address the key requirements of the LPG. The LPG proposes a range of different standards which co-living schemes should adhere notably:

5.41.1 All residential units should be between 18 – 27sqm in area.

5.41.2 At least 5sqm of internal communal facilities should be provided per resident. These facilities include kitchen, dining and lounge areas.

5.41.3 At least 1 sqm of usable external space should be provided per residents, with each external space area being a minimum of 40sqm in area.

5.41.4 Space for one washer and dryer should be provided for every 10 residents.



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. These studies have been updated to reflect the changes now made.

6.2 To support the revisions to the scheme, the following technical reports are provided:

- Heritage Impact Assessment – produced by AC Archaeology;
- Air Quality Technical Note – produced by Kairus Ltd;
- Townscape and Visual Analysis – produced by Define;
- Ground Investigation – produced by Wesson Environmental;
- Daylight and Sunlight Report - produced by Delva Patman Redler;
- Ecological Assessment – produced by Tyler Grange;
- BREEAM Pre Assessment Statement – produced by SRE;
- Foul and Surface Water Drainage Strategy – produced by Hydrock;
- Noise Assessment – produced by Matrix;
- Transport Technical Note – produced by Entran.

Heritage Impact Assessment

6.3 A heritage impact assessment (HIA) has been carried out by AC Archaeology in support of the proposed development. A copy of the HIA has been provided as part of the planning application.

6.4 The HIA provides a review of the known archaeology in the area of the scheme, considers the historic character of the existing dwelling on the land and the



archaeological potential of the site and assesses the potential impacts of the proposals on the site's historic potential.

6.5 Section 4 of the HIA sets out the methodology which has been employed. This has included a desk top appraisal including a review of the Devon Historic Environment record and site visit which was undertaken on 21st November 2022.

6.6 Section 5 reviews the archaeological and historical background of the site. It notes that there 30 listed buildings within 500m of the site and that parts of three different conservation areas are within 250m distance. The HIA notes that there are a range of archaeological records for the area close to the site, notably medieval period water infrastructure (for example wells and aqueducts). The HIA notes that by 1891 the area, formerly in agricultural use, had been developed for housing, with the adjacent railway having been completed in 1860. The existing Victorian villa on the land has remained largely intact since its construction albeit with the extent of its original grounds having been reduced.

6.7 Section 6 considers the character and form of the existing villa and the grounds within which it is located.

6.8 Section 7 of HIA assesses the site's archaeological potential. Paragraph 7.1 note that the archaeological potential of the area within which the site is located relates primarily to medieval water management. The HIA notes that:

"There is no evidence to indicate that the site has any specific archaeological potential in relation to the archaeological records within the study area."

6.9 In relation to the villa, this is considered to have:

"...historical potential as a well preserved example of a detached upper middle class Mid Victorian residential property."

6.10 Section 9 sets out the HIA conclusions.



- 6.11 In relation to below ground archaeology, paragraph 9.3 concludes that the identified archaeological potential relates to demolished structure associated with the Victorian villa.
- 6.12 In relation to the impact on heritage assets, paragraph 9.4 concludes that the scheme would not affect aspects of setting that contribute towards the significance of the nearby listed buildings or conservation areas.

Air Quality

- 6.13 Kairus Limited was commissioned by the applicant to undertake a review of the air quality issues associated with the scheme. A copy of their technical note on this has been submitted as part of the application.
- 6.14 Section 3 of the review considers the baseline air quality position. It notes that the site does not fall within an Air Quality Management Area (AQMA), the nearest of these being the Old Tiverton Road, approximately 140m to the east. The review considers the nitrogen dioxide (NO₂) concentrations at the nearest monitoring stations, located on York Road approximately 360m to the south-west. It notes that NO₂ levels at these locations, which are adjacent to the main road network, are consistently below that the annual mean objective level. With the scheme being located on a quiet back street, pollution concentrations at the site can be expected to be considerably lower than at the monitoring stations. The review also concludes that NO₂ pollution concentrations at the site can also be expected not to exceed the 1 hour objective level.
- 6.15 Section 4 considers the suitability of the site to accommodate the specific form of development proposed. The review considers the potential impacts in relation to NO₂ and particulate concentrations and within the context of emissions from both nearby roads and the adjacent railway. The review concludes at Section 4.1 that:
- “...based on local monitoring data and a screening of potential railway emissions air quality at the Site is expected to be meeting the relevant air quality objective limits and is therefore considered suitable for residential development.”*
- 6.16 Section 5 sets out the conclusions of the review and notes:



“The proposed development would meet current national and local planning policy. Based on the above air quality does not pose a constraint to development of the Site as proposed.”

Townscape Analysis

- 6.17 A full townscape analysis (TSA) of the site and its surroundings has been undertaken by Define and a copy of their report has been provided as part of the planning application.
- 6.18 The townscape analysis has been used to establish the urban design principles which have guided the approach used the architects to develop the scheme’s design.
- 6.19 The townscape analysis includes a review of existing character assessments which have been completed at the national, Devon and neighbourhood level. This part of the work also reviews relevant local designations, for example those relating to existing heritage designations in the vicinity and development plan policy as set out in Exeter Local Plan and Core Strategy as well as that in the St James Neighbourhood Plan.
- 6.20 Section 1.5 considers the specific characteristics of the site, with this emphasising the predominantly residential character of the area.
- 6.21 Section 1.6 sets out a Zone of Theoretical Visibility which identifies the extent to which there might be views of the site from the surrounding area. Importantly, this section of the TSA notes that the visual envelope of the site is well contained. Views of the site beyond 250m distances are very limited with only some distant, glimpsed views being possible from the Pennsylvania and Northernhay Gardens areas.
- 6.22 Section 1.7 of the TSA considers the nature of the townscape in the immediate vicinity of the site. Key characteristics are considered to be narrow residential streets with many buildings being set directly onto the street. Heights are typically up to two storeys but taller along Prospect Park to the north of the site. The football stadium and associated student housing development to the south are considered to have a considerable influence on the immediate character of the area around the site.



- 6.23 Section 3 of the TSA considers in more detail the urban design context including the historic pattern of development, the mixture of land uses and permeability and movement in the area.
- 6.24 In relation to the pattern of building heights, the TSA shows the site being located on the edge of an area of two storey development with heights increasing to three storeys to the north. To the south, building heights exceed three storeys, with these being up to five storeys.
- 6.25 Section 3 also considers the block structure of the area. It notes that that whilst the area is typically dominated by perimeter blocks which front directly onto roads. However, the site is noted as being a departure from this pattern, with the existing dwelling being set back and isolated from the road.
- 6.26 Section 3.7 sets out a number of urban design recommendations which could be used to inform any development of the site. Relevant points include opportunities to provide a vehicular access onto Victoria Street, to create a strong pedestrian connection to South View Terrace in order to allow connection to the wider area, to allow for an increase in heights toward the eastern corner of the site and to create interest in new buildings which may be visible from Victoria Street.
- 6.27 Based on the analysis set out in the previous parts of the TSA, Section 4 sets out four massing/siting options (Options A to D) which could be employed as part of any development of the site. Section 4 then considers the potential impacts of the different options when viewed from seven key views around the site.
- 6.28 Options A to C were developed to test a range of different options showing differing building heights and layouts across the site, with different opportunities and constraints applying to each option. From these, Option D was developed to test a lower building option, showing a maximum building height of four storeys.
- 6.29 Wireline drawings were prepared to identify the massing of the various options from the key viewpoints comprising:



6.29.1 Viewpoint 1 (close to the site from Victoria Street).

6.29.2 Viewpoint 2 (from a more distant view from Springfield Road).

6.29.3 Viewpoint 3 (from between a gap in the buildings on Prospect Park).

6.29.4 Viewpoint 4 (from the park to the east of the site).

6.29.5 Viewpoint 5 (from South View Terrace).

6.30 The conclusions of this view analysis are set out in the schedule at Section 4.3 with an assessment of the likely effects of the scheme from each of the viewpoints. This shows that Option D is the option which has the most acceptable massing. Importantly, Section 4.3 also considers the implications of the scheme as now proposed on the identified views. This scheme, which is an evolution of Option D, is shown to be an acceptable proposal in townscape terms.

Contamination

6.31 A Phase 1 Site Investigation has been undertaken by Wesson Environmental.

6.32 As part of the Phase 1 Investigation, the historic use of the site was researched. A review of old maps confirmed that a dwelling was built on the site by 1905. A garage type building was constructed on the land by 1932.

6.33 Wesson Environmental carried out a walkover survey of the site on 4th November 2022.

6.34 The investigation considers the potential for development of the site to affect different receptors in the area such as local aquifers and water courses.

6.35 From the work carried out, the Investigation concludes that there is the potential for hydrocarbon contamination to arise from the former garage. In relation to other potential contamination impacts, Section 7.3 of the Site Investigation concludes that the proposed development would have a negligible risk to water courses or aquifers. The scheme would not be a risk of radon gas. Because of the former garage use, the scheme is considered to present a moderate risk to human health.



6.36 The Investigation recommends that as part of any works on the scheme, an intrusive investigation be carried out in any areas of the proposed soft landscaping in order to better quantify the extent of potential contamination.

Daylight and Sunlight

6.37 A Daylight and Sunlight Report has been provided by Delva Patman. This considers the impact of the scheme as now envisaged and with the building changes proposed.

6.38 Section 2 of the report sets out the relevant policies and guidance which has been used to inform their work. These include the guidance at paragraph 125 of the NPPF which notes that local authorities should take a flexible approach to the application of standards and guidelines, including those relating to daylight and sunlight in order to facilitate the efficient use of land.

6.39 The report also refers to the use of BRE Report 209 (2022) which sets out the approach to be used to assess sunlight and daylight in new developments. It highlights the guidance at paragraph 2.5 of the BRE Report which advises that its approach is not mandatory and that the numerical guidelines should be applied flexibly with natural lighting being only one of many factors to be considered in scheme design. The BRE guide specifically notes that there is a need for flexibility in city centre locations or areas where there are high buildings.

6.40 Section 4 of the Daylight and Sunlight Report sets out details of the methodology which has been used.

6.41 In relation to possible daylight impacts, the Report considers the potential impact of the scheme on both the existing buildings which adjoin the site and on other parts of the scheme using the Vertical Sky Component (VSC) and No Sky Line (NSL) techniques and in conjunction with the BRE document BS EN17037:2018 *'Daylight in Buildings'*. The Report sets out the approach to be taken to identifying windows which have the potential to be affected and the thresholds which those windows should meet.

6.42 In relation to sunlight impacts, the Report considers the potential impacts on both existing buildings, including on neighbouring gardens, and other parts of the scheme



using the Average Probable Sunlight Hours (APSH) technique. The Report sets out the approach to be used to identify windows likely to be affected and the threshold light levels which should be achieved.

- 6.43 Section 9 of the Report sets out the results of the analysis in relation to light levels achieved within the whole of the scheme.
- 6.44 In relation to daylight levels, Table 5 of the report concludes that 52 out of 81 rooms (i.e. 64%) would meet or exceed the BRE guideline levels. Whilst a number do not meet the guideline levels (those within the northern block), the report notes that due to their dual aspect design, this impact is offset by the exceptional sunlight levels which these units would benefit from.
- 6.45 In relation to sunlight levels, Table 6 of the report concludes that 80 out of 81 rooms (i.e. 99%) would meet or exceed the BRE guideline levels.
- 6.46 In relation to the light levels which can be expected within the scheme, paragraph 9.8 of the Report notes that the scheme performs very well against the BRE guidelines, and the scheme has been designed to ensure that all units will receive good levels of direct sunlight.
- 6.47 Section 10 sets out the conclusions of the assessment in relation to daylight and sunlight impacts on neighbouring properties which abut the application site on Victoria Street, Culverland Road and on Prospect Park.
- 6.48 In relation to potential daylight effects, Tables 7 and 8 set out the results in relation to VSC and NSL guidelines respectively. This analysis shows that 84% of the windows in nearby properties will exceed VSC guidelines and 89% will exceed NSL guidelines. Where failures are expected, these primarily relate to the existing HMO accommodation immediately adjacent to the west side (No.s 78 – 80 Victoria Street) and these are already located in close proximity to the existing buildings on the site.
- 6.49 A number of other properties are affected and these are analysed at paragraphs 10.7 to 10.53 of report. However, in each case the bulk of the facing windows meet the



guideline levels and where failures do occur, these are generally very modest. No 77 Victoria Street shows some failure in light levels but the degree of failure is the result of that property looking out onto a currently open part of the scheme site.

6.50 In relation to sunlight levels at neighbouring properties, Table 9 summarises the impacts and notes that 68 of the 69 appraised rooms (99%) would exceed the APSH thresholds. Only one ground floor room in 22, Prospect Park would fail and this by a very narrow margin.

6.51 Finally, at paragraphs 10.56 to 10.58, the report assesses the potential impact on the sunlight levels within neighbouring gardens and amenity spaces. It notes that on 21st March, 11 of the 20 areas (55%) would meet BRE guideline levels. Of the nine areas which are likely to fail, 4 already experience very low levels of sunlight due to their orientation or the effect of existing obstacles. The report has also considered the degree of sunlight which the areas would experience across the summer with 17 of the 20 areas (85%) meeting the BRE guidelines. Of the remaining three areas, two are north facing with the other one area only failing by 2%.

6.52 Section 11 of the report reviews the conclusions of Delva Patman's analysis and notes:

"The VSC and NSL results indicate good compliance with the BRE guidelines. There are minor transgressions to neighbouring residential properties, however, this is inevitable when a largely vacant site is redeveloped, and we are of the opinion that all neighbouring properties will remain with adequate levels of daylight in the post development condition...The sunlight results indicate that generally all properties will satisfy the BRE guidelines...The overshadowing results indicate that the neighbouring amenity area tested will satisfy the BRE guidelines...The internal daylight and sunlight results show that the proposed dwellings will benefit from daylight that are commensurate with several other developments, and the sunlight results show a very good level of compliance with the BRE guidelines...Overall, the daylight and sunlight results show an acceptable adherence with the BRE guidelines indicating that the majority of neighbouring residential properties and proposed dwellings will benefit from acceptable levels of daylight and sunlight that is not uncommon with other



developments of this nature...In conclusion, it is submitted that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight term, particularly having regard to paragraph 125 of the National Planning Policy Framework and meets the intentions of the local plan." [Our emphasis]

Ecology

- 6.53 An Ecological Assessment has been undertaken by Tyler Grange (TG) and a copy of their report has been submitted as part of the application.
- 6.54 As part of their work, TG undertook a desk survey of the area to consider existing ecological records for the site and adjoining areas. Following this, an extended Phase 1 habitat survey was undertaken in August 2018. This was followed by further walkover surveys carried out in May 2021, December 2022 and May 2023. Please paragraphs 2.1 to 2.7 of the report.
- 6.55 In addition to the above, detailed surveys were carried out in the same period to assess the presence of badgers, bats and breeding birds.
- 6.56 The bat survey work included surveys of both the interior of the buildings on the site and a ground level tree assessment.
- 6.57 Section 3 of the assessment sets out the result of the survey work.
- 6.58 Habitats and flora on the site include areas of amenity grassland with amenity/ornamental hedgerows and planting which are considered to be of no more than site level importance (see paragraphs 3.15 to 3.22).
- 6.59 The results of the ecology assessment in relation to the various buildings and hardstanding on the site is set out at paragraphs 3.23 to 3.36 of the report with these being considered to have negligible ecological importance.
- 6.60 In relation to protected and priority species, the assessment notes:
- 6.60.1 The site is unlikely to support greater crested newts or other amphibians (see paragraph 3.4.5).



- 6.60.2 Evidence for the presence of badgers was identified with outlier badger setts being recorded on and adjacent to the site in the 2018, 2021 and 2022 surveys. However, the 2023 surveys indicated that the badger sett and nearby tunnels were all disused with little other evidence of recent badger activity. Additionally, no badgers were observed during the 2023 bat surveys. The site is therefore considered to be of no more than site level importance for badgers (see paragraphs 3.46 to 3.56).
- 6.60.3 The site and the buildings have been assessed to understand their potential as habitat for bats. Emergence surveys were undertaken in May 2023 with these showing no evidence of bats emerging or flying close to the buildings. Other bat surveys undertaken around the site in 2018 and 2023 showed that bat activity was restricted to occasional passes. Overall, the site is considered to be of no more than site importance for bats (see paragraphs 3.57 to 3.68).
- 6.60.4 Although a large number of records for breeding birds were recorded for the area, the surveys only recorded pigeons as being present on the site. Although some nesting and foraging habitats are present on the site, similar and better quality habitats are available close to the site. The site is therefore considered to be of no more than site value for birds (see paragraphs 3.69 to 3.71).
- 6.60.5 The site is considered to be of more than site importance for invertebrates, hedgehogs (paragraph 3.77) and reptiles (see paragraphs 3.73 to 3.76) and no importance for dormice (paragraph 3.72).
- 6.60.6 Following the assessment of ecological sensitivity, Section 4 of the assessment sets out a range of measures to protect such species as are present on the site for example through the use of controls on works during construction of the scheme, for example through the use of a Construction and Ecological Management Plan (CEMP). It is recommended that provision is made for the installation of bat and bird boxes within the scheme building. These measures could be applied through the use of suitably worded planning condition.



Energy and Sustainability

- 6.61 As part of the work, a BREEAM pre-assessment review of the proposed scheme has been carried out by SRE, with a copy of their report been provided as part of the planning application. This considers the scheme's potential to attain a BREEAM 'Excellent' rating, as required by the Council under Policy CP15 of the Exeter Core Strategy for new residential developments.
- 6.62 The SRE review considers the scheme's potential under the various BREEAM categories. Paragraphs 1.2 and 1.3 of the Review confirm that the scheme would achieve an overall target score of 77%, and thereby have the ability to achieve the desired Excellent rating.

Flood Risk Assessment and Foul and Surface Water Drainage

- 6.63 A flood risk assessment (FRA) and separate foul and surface water drainage strategy have been prepared by Hydrock and a copy of these has been submitted as part of the planning application.

Flood Risk Assessment

- 6.64 The FRA considers the site's potential flood risk. It confirms that the site is located within Flood Zone 1 and is therefore at a low risk of flooding from rivers.
- 6.65 In relation to the potential for surface water flooding, for example as a result of an extreme rainfall event, the FRA notes that the site is largely subject to a low risk. The western fringes, running along the adjacent roads/access ways of the site are at a higher risk from this source but that the expected depth of any flooding which does occur would be shallow. Overall, the risk from surface water flooding is considered to be low.
- 6.66 The FRA concludes that there is little risk of flooding from ground water flooding or from the potential failure of water infrastructure. The land is not within a Critical Drainage Area.



6.67 To address the residual risk which has been identified in relation to surface water, the FRA suggests that finished floor levels of the development should be a minimum of 300mm above ground level.

Surface and Foul Water Drainage

Surface Water Drainage

6.68 Section 3 of the drainage strategy sets out the proposed approach to surface water drainage. Paragraphs 3.2.3 and 3.2.4 conclude that due to the nature of the underlying soils, the use of soakaways is unlikely to be a suitable means of disposing of surface water runoff. It is therefore proposed (see paragraph 3.2.6) that surface water be discharged to into the public surface water sewer which runs along Victoria Street adjacent to the site, with discharge rates limited to as close to greenfield levels as possible. Allowance has been made for the effects of climate change with an allowance of 45% made.

6.69 As part of the scheme, it is proposed that permeable paving be provided across the bulk of the external ground floor area with a number of green roofs provided across the scheme.

6.70 Paragraphs 3.2.8 to 3.2.15 summarise the calculations which have been used to identify the required discharge capacity and the techniques to be applied to drain the site. In summary, the bulk of the site will drain into large cellular storage tank which would be sited under the access and servicing area within the western part of the site. Additionally, it is proposed that the south-eastern part of the site would drain to a much smaller cellular storage tank which would be located on the southern side of the site. Both tanks would then discharge at attenuated rates into the adjacent public surface water sewer. A plan showing these arrangements is included within Appendix C of the drainage strategy.

Foul Drainage

6.71 Section 4 of the Drainage Strategy sets out the proposed approach to foul drainage. It is proposed that a connection be made into the existing sewer which runs along Victoria



Street adjacent to the site. An assessment of the foul water flows emanating from the scheme are set at paragraph 4.2.3 of the Strategy.

Noise

- 6.72 Matrix Acoustic Design Consultants have prepared a Noise Assessment to consider the suitability of the scheme in relation to noise in the vicinity of the site with particular regard to the possibility of noise impacts arising from the adjacent railway line.
- 6.73 Section 3 sets out the guidance relevant to noise management for schemes of the form proposed. It notes that fewer than 10 noise events at L_{Amax} 60db during the night was likely to suggest a low risk of noise disturbance. A high risk is likely to be denoted if there are more than 20 noise events at levels in excess of 80dB.
- 6.74 Section 3 also identifies the internal noise levels established under BS8233:2014 for habitable rooms (living rooms, dining rooms and bedrooms) for both night and day.
- 6.75 Section 4 confirms that a noise level survey was undertaken on 30th and 31st June 2018 and two different locations within the eastern parts of the site. Table 2 of the noise assessment details the conclusions of the noise surveys at both locations with these being noted as being either low or negligible.
- 6.76 Section 4.3 of the assessment considers the particular noise potential associated with the railway line. It notes that the greatest noise levels were encountered at Position 1 within the north-eastern part of the site and at a height of 4.5m above ground level.
- 6.77 The noise assessment concludes that the scheme's overall risk from noise is considered to be low. However, it notes that the maximum noise levels from the railway have the potential to impact on scheme bedrooms within those parts of scheme closest to the railway line. However, the noise assessment also indicates that these impacts can be mitigated through the use of façade sound insulation on the eastern sides of the three blocks.



6.78 Section 5.3 of the noise assessment provides details of the specification which could be used to address the potential noise impacts from the railway to allow compliance with BS8233 guidance.

6.79 The noise assessment indicates that across the bulk of the scheme, noise levels will be acceptable with the windows open in the individual apartments.

Transport

6.80 A Transport Statement (TS) has been produced by Entran and this reviews the proposals from a highways and transport perspective. A copy of this has been submitted as part of application.

6.81 Section 3 of the TS highlights the site's accessibility to facilities and services. It notes that there are a number of bus stops on Union Road, Old Tiverton Road and Holloway Street, with all of these being less than 420m walk away. The note also identifies a wide range of facilities nearby including a pub, convenience shop and the university campus which itself include a range of facilities. It is concluded that the site is well located to promote sustainable travel.

6.82 In relation to the proposed scheme, the TS notes that no car parking will be provided for residents and this allows space on the site for emergency and maintenance vehicles to access the property.

6.83 It is noted that secure bin store would be provided for the scheme and that this can be accessed by residents with management able to move the bins a distance of 20m to a kerbside location for collection.

Trees

6.84 Hillside Trees Limited have prepared an Arboricultural Impact Assessment (AIA) and a Tree Removal Plan for the proposed development. A copy of this has been submitted as part of the planning application.

6.85 As part of the scheme, it is proposed that all the trees on the site will be removed.



- 6.86 As part of their assessment, Hillside Trees undertook tree surveys in September 2018 and then in March 2022. The survey confirms that the site contains 22 individual trees and two groups of trees. These are a mixture of Leyland and other cypresses, sycamore and holly. The AIA grades all the trees as being Category C1 or U quality and are therefore of a low quality.
- 6.87 The AIA notes that there are three trees on third party property adjacent to the site. However, these would not be affected by the scheme.



7 JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

The Principle of the Development

- 7.1 The proposed redevelopment of the land for a co-living scheme is considered to be entirely appropriate and to be in material accordance with both development plan and national planning policy.
- 7.2 The scheme proposes the redevelopment of a redundant brownfield site in a central and highly sustainable location where there is extremely good access to public transport, services and employment opportunities. The use of the site to provide a form of housing for which there is a clear and growing need is therefore considered to be entirely appropriate. Given the central urban context, it is important that the fullest possible use be made of the opportunity which such a redevelopment of the land presents. Such an approach is consistent with the Council's stated objectives for delivering its vision for the city. It is also consistent with the various development plan policies such as those within the Core Strategy (Policy CP5) and those 'saved' from the Local Plan (Policies AP1, AP2 and H1). The scheme also accords closely with the guidance within the NPPF notably that at paragraphs 68 and in Section 11, and which strongly encourage the use and optimisation of sustainably sited brownfield sites.
- 7.3 It is clear from pre-application discussions that the Council agrees that the principle of redeveloping the land for a residential related use is acceptable and that every effort should be made to optimise its potential without harm being generated to the amenity of local residents and to provide a high quality form of design.
- 7.4 Use of the site for a co-living form of use is also considered to be entirely appropriate. This type of activity will provide an additional form of residential accommodation for use by mainly younger people, many of whom have limited opportunities to access alternative forms of housing and in a central, city centre location. Provision of co-living accommodation on the land will therefore help to diversify and modernise the supply of housing in the city.



Design and the Relationship With Existing Residential Properties

- 7.5 As part of the scheme's evolution and in response to a number of pre-application concerns expressed by the Council, the scheme as now envisaged has been to a number of fundamental changes to ensure that it is of an appropriate and high quality design and that it will protect the amenity of existing residents.

Architectural Design

- 7.6 Officers have previously expressed concerns about the form of the scheme and they indicated that any development on the site should not be overly tall and should take address the character of, and relationship with the existing housing around the site.
- 7.7 Full analysis of the scheme's design is set out in the DAS which forms part of the application. In responding to officer's previous concerns, the architects have also had reference to the townscape analysis undertaken by Define and which has provided guidance on the form and massing to be used. It is considered that with the changes now proposed and which include a reduction in the extent, height and forms of the different blocks and the use brick, pre-cast stone and timber cladding materials, the style and form of the scheme respectfully responds to the character of the area.
- 7.8 The revised design and massing would sit comfortably within views from the surrounding area. This is clear from the visualisations (see Section 5 of the Design and Access Statement) provided as part of the submission. It will be noted that, through the use of pitched roof and the incorporation of accommodation within the roof space, a sympathetic design approach is achieved which relates comfortably to the surrounding area.
- 7.9 The overall approach is to reduce the height of the three blocks to a lower height of between two and three storeys in those parts of the site closest to the existing houses on Prospect Park and Victoria Street. Some additional height is proposed for the parts of the site which are further away and closest to the railway line. The tallest part of the scheme is located in the north-eastern corner at a position alongside the railway line but also at position some distance from the nearest houses on the Prospect Park.



7.10 In addition to the siting and massing of the three blocks, the scheme proposes to retain the current access and servicing arrangement on the western side of the site and this area therefore would remain free of built development and thereby act as a further buffer between existing and proposed buildings.

Impact On Existing Residential Amenity

7.11 The potential impact on the amenity of neighbouring occupiers, particularly those living on Prospect Park and Victoria Street, has been considered in detail and the design has been revised to ensure that the scheme has an entirely acceptable relationship with the surrounding area. The design takes account of the guidance set out in Exeter Residential Design Guide with details of these set out in the DAS.

Privacy

7.12 The scheme has been designed to ensure that there would be no loss of privacy to existing residents.

7.13 As the analysis within the DAS shows (see Section 4.12.2 of the DAS), the scheme ensures that there would be adequate privacy in the following ways:

7.13.1 To the rear of the houses on Victoria Street, the distance to the scheme Central Block is limited (7.3m). This separation reflects the distance with the existing garage workshop building which currently occupies the site of the proposed Central Block. To address the privacy issue in this part of the site, it is proposed that all the rooms facing the rear of Victoria Street will incorporate oriel windows which will direct occupants' views away from the adjacent properties. This solution is appropriate as the apartments in this block are dual aspect allowing sufficient level of light into the rooms. Section 4.12.4 of the DAS provides more details on the design of the fenestration in this part of the scheme.

7.13.2 To the rear of the houses on Prospect Park. The distance between the northern side of the Central Block and the rear of the houses on Prospect Park exceeds 22m and is therefore acceptable. The northern side of the Northern Block does not contain any windows and no issues of loss of privacy would arise from this part of the scheme.



Outlook

- 7.14 Again, the analysis within the DAS demonstrates (see Section 4.12.5) that the scheme would not have an adverse impact on the outlook of the adjoining houses.
- 7.15 To the rear of the houses on Prospect Park, the potential impact on outlook from the effect of the Northern Block, which presents a blank elevation to the houses to the north, has been considered and taking account the changes in height of the Block. The relationship has been tested at three points (A to C), reflecting the three changes in height. The analysis confirms that the Northern Block meets the SPD outlook guidelines for Points A and B. The distance at Point C fails to meet the required distance of 13m but with the distance being 12.6m, the degree of failure is marginal. Any adverse impact is further reduced by the oblique alignment of the Northern Block relative to the houses on Prospect Park. Given the inner urban context, the relationship between this part of the scheme and the houses on Prospect Park is considered to be acceptable.
- 7.16 To the rear of the houses on Culverland Road, the potential impact on the outlook from the blank western elevation of the Central Block has been considered. To the main part of the rear elevation of the Culverland Rod houses, is a distance of 15.8m whilst the distance to the rear extensions of these houses is 10.8m. These fall short of the SPD guideline distance of 20m. However, and as the DAS notes, the adverse effect of this part of the scheme would be substantially reduced by the narrow width of the Central Block which would limit its impact. Furthermore, the bulk of the rooms within the rear extensions of the Culverland Road properties appear be used as bathrooms or similar (see Section 4.12.7 of the DAS) and are therefore much less sensitive to change than habitable residential rooms would be. Overall, whilst this part of the scheme fails to meet the SPD guidance for outlook, the impact of this is likely to be limited in practice. In any event, such a relationship is not inconsistent with the dense Victorian character of this part of Exeter. In summary, therefore the scheme will not have an unacceptably adverse impact on the residential amenity of existing and future residents.



Sunlight, Daylight and Overshadowing Impacts

- 7.17 A robust assessment of the scheme's impacts on sunlight, daylight and overshadowing has been carried out. This confirms that the scheme will have an acceptable impact not in relation to the levels of light which residents which can reasonably expect but also in relation to impacts on adjacent properties.
- 7.18 In relation to internal levels, the scheme would achieve extremely high levels of sunlight. Daylight levels would also be high. A minority of rooms would achieve a lower level of daylight than the BRE guidelines would suggest. However, in those cases the degree of shortfall would be limited, with any impact offset by the extremely high levels of sunlight which those units would benefit from.
- 7.19 In relation to the adjoining properties, the scheme would achieve extremely high levels of both daylight and sunlight. Some failures can be expected against BRE guidelines in relation to daylight levels but these are both limited in number in the degree of failure. The scheme is not expected to have an adverse impact on the level of shadowing which the gardens of adjacent properties would be subject to.
- 7.20 In summary, the scheme is considered likely to have an acceptable impact in relation to daylight and sunlight impacts with the level of light which would be experienced entirely commensurate for a development in a dense, city centre location.

Internal Design and Layout

- 7.21 The scheme has been designed to provide a high quality of accommodation for its residents and one which will make it attractive to them. The internal layout has been informed by successful co-living schemes elsewhere in the UK, details of which have been provided as part of the scheme documents (see architects' Design and Access Statement).
- 7.22 It will be noted that the Council does not have any form of policy or guidance to refer to in assessing the suitability of the internal configuration of the scheme and which could otherwise be used to judge the application. However, in the interim, the approach set out in Greater London Authority's *Large Scale Purpose Built Shared Living* guidance has



been used to inform the scheme design. It should be noted that the GLA's guidance is in draft form and cannot therefore be used to bind the design of the scheme especially given that guidance is designed to address London housing market issues.

- 7.23 Notwithstanding the above and in relation to the room sizes, it will be noted that these are of a similar or larger size than those provided in the other co-living schemes which have been built or approved including the schemes at Gladstone Road and at the Harlequins as well as elsewhere. As the drawings show, the internal layout of the individual apartments provides an adequate layout for the occupations.
- 7.24 Communal space. The scheme proposes a mixture of different types of communal space on the ground floor. The provision of communal space in the form and mix envisaged is entirely in line with that which is typically proposed for co-living schemes elsewhere and which provides a balanced range of amenities for the scheme residents. The scheme also proposes a range of external amenity space provision, in the form of both ground floor and roof top gardens. The total level of provision (630sqm) exceeds the LPG guidance level, that at least 1sqm of usable open space be provided per resident, which amounts to 202 persons in this instance.
- 7.25 With regard to both the sizes of the studios and the level of communal space provision being proposed, it is clear from a review DAS document that, by comparison with other approved co-living schemes across the UK, the scheme is either equivalent to or more generous in the amount of accommodation being proposed.
- 7.26 These factors all strongly indicate that there is an acceptable provision of both private and communal space proposed within the scheme.

Other Matters

Landscaping and Biodiversity

- 7.27 A full ecological analysis of the site has been undertaken and this confirms that the site currently has a very low level of ecological sensitivity, with a negligible presence of protected species. The ecological assessment makes recommendations regarding the provision of a number of ecological enhancements, such as the provision of bat and bird



boxes, which would be provided as part of the scheme. The measures could be secured through the use of a suitably worded planning condition.

7.28 In relation to landscaping, the proposals are accompanied by a full set of landscaping proposals which would support and enhance the overall quality of the design.

7.29 Given the above, it is considered that the scheme would be entirely acceptable in relation to ecological and landscaping matters.

Highways and Movement

7.30 The site is in an ideal location for a car free development, given its location in close proximity to the city centre, which is just to the west of the site. The site also benefits from excellent public transport links and is very accessible for pedestrians and cyclists. As well as being inherently well suited to non-car modes of transport, a high level of dedicated cycle storage would be provided and this would further to assist with meeting national and local planning objectives to encourage sustainable forms of development.

7.31 The proposed development would not result in on-street parking problems. 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.

Energy Efficiency and Sustainable Building Design

7.32 As part of the proposals, and as the supporting technical material provided shows, the scheme would achieve a BREEAM 'Excellent' rating and the scheme would therefore accord with the Council's development plan Policy CP15 on this issue.

Management Measures

7.33 The analysis set out above confirms that the proposed development can be brought forward without any materially adverse effect on the area and on nearby residents. Additionally, and where required, management plans can be used to control aspects of the scheme. These might include the use of a construction management plan (CMP) to



identify and control the effects of the construction phase of the development.

The day-to-day operation of the co-living scheme can be subject to measures set out in an operational management plan. Where needed, such measures have been applied as part of the grant of planning permission for similar schemes elsewhere in the city and can be secured via planning conditions or legal agreements in the usual way.

CONCLUSION

- 7.34 In conclusion, the assessment set out above shows that the scheme will address Council policies, national planning objectives and established guidance and which seek to optimise the use of previously developed land in central and accessible locations in order to deliver high quality, sustainable development. The scheme will help the Council to meet its own existing and emerging objectives of providing a new and more diverse supply of residential accommodation to the city centre and will meet a clear need for housing for young people. The scheme will also address the Council's requirements that that new developments are designed to a high standard and in a way which respects the character of the area.
- 7.35 The scheme as now presented has been developed to take full account of pre-application advice previously provided by the Council and the South West Design Review Panel as well as that of the later Panel, with the scale of development being proposed reduced and with the layout being altered as a result. The scheme has been very carefully refined to ensure that it would not have an adverse impact on the amenity of existing residents or on that of the future occupiers of the building. The scheme's suitability in this regard has been shown through the detailed analysis which has been undertaken.
- 7.36 The proposed development represents an excellent opportunity to secure the reuse of the existing land for a high quality and much needed form of development. It aligns closely with both development plan policy and important material considerations in the form of the NPPF and the Exeter Residential Design Guide.
- 7.37 The scheme would represent a high quality and sustainable development which has been carefully designed to take account of the character of the surrounding area.



7.38 There are no technical reasons which might indicate that the proposals cannot be delivered. Therefore, and in line with the presumption in favour of sustainable development set out at paragraph 11 of the NPPF, planning permission should be granted for these proposals. We ask officers and Members of the Council to recognise the very positive nature of the proposals and to grant planning permission for the scheme.