



EIA Screening Opinion Statement of Reasons

Regulation 5.(5) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Date: 02 December 2024

| Part 1 | Application Details | |
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| a | Application Number: 24/1196/SO | |
| b | Site Address: Department Of Works And Pensions, Clarendon House, Western Way, Barnfield Exeter EX1 2DA | |
| c | Brief description of development: Purpose Built Student Accommodation <ul style="list-style-type: none"> Demolition of existing building. Redevelopment of the site to create building up to a maximum of 72m AOD. Up to 310 student bedspaces. Along with potential commercial and/or community uses at ground floor level. | |
| d | Area of development/works/new floorspace (as appropriate): Square metreage not provided, but the proposal is for up to 310 student bedspaces, along with supporting facilities at ground floor level alongside potential commercial and/or community uses at ground floor level. | |
| e | Has sufficient information been provided, i.e. a plan sufficient to identify the land, a description of the development (including its physical characteristics, sensitivity of the location, aspects of the environment likely to be significantly affected, likely significant effects from residues/emissions, production of waste and use of natural resources), and such other info/refs developer wishes to provide, including features/measures envisaged to avoid/prevent significant adverse effects – for approval of RM/conditions, also sufficient info to identify original permission, and likely significant effects not previously identified? <i>(If no, notify in writing what additional info required)</i> | |
| | Yes/No | Yes The information provided is minimal and the request was only considered valid on receipt of additional information requested by the LPA. However, the info is now considered sufficient for EIA screening purposes. |
| f | Subsequent applications | |
| (i) | Approval of reserved matters or conditions? <i>(If no, go to Part 2)</i> | |
| | Yes/No | No |

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| (ii) | If YES to f(i), enter the description of development subject of the related planning permission: | |
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| (iii) | If YES to f(i), was an Environmental Statement submitted with the application for the related planning permission? <i>(If no, go to Part 2)</i> | |
| | Yes/No | |
| (iv) | If YES to f(iii), is the environmental information adequate? <i>(If no, serve notice requesting further information in writing) – go to Part 3</i> | |
| | Yes/No | |

| Part 2 | EIA Details |
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| a | Schedule 1 |
| (i) | Is the proposed development 'Schedule 1' development as described in Schedule 1 of the EIA Regulations (as amended)? |
| | Yes/No No |
| (ii) | If YES, under which description of development (1-24)? |
| | N/A |
| b | Schedule 2 |
| (i) | Is the proposed development described in Column 1 of Schedule 2 of the EIA Regulations (as amended)? |
| | Yes/No Yes |
| (ii) | If YES, under which description of development in Column 1 (1-13)? |
| | 10(b) |
| (iii) | If YES to b(i), is the proposed development 'Schedule 2' development, as any part of it will be carried out within a 'sensitive area', i.e. SSSI, scheduled monument or European site (NB. the other areas do not apply to Exeter)? |
| | Yes/No No part of the site is within a sensitive area, but it is close to a number of sensitive areas, including European sites on which mitigation is required to mitigate significant effects under The Conservation of Habitats and Species Regulations 2010. |
| (iv) | If YES, which area? |
| | <p>The application is not within a Scheduled Ancient Monument, but there are several nearby. The closest are as follows:</p> <ul style="list-style-type: none"> • Exeter City (Roman) Walls – linear, 350m to the WSW at closest point) • Underground Passages - linear, 360m to the WSW at closest point) • Rougemont (Exeter) Castle 490m to the West, and • Part Of The Roman Town Of Exeter, Beneath Cathedral Green, 530m to the South West). <p>The site is also within close proximity to a number of SSSIs:</p> <ul style="list-style-type: none"> • Bonhay Rd Cutting SSSI is 1.25km to the West • Stoke Woods SSSI is 2.7km to the North <p>The following SSSIs are also identified as SPAs/SACs:</p> <ul style="list-style-type: none"> • Exe Estuary SSSI and Ramsar Special Protection Area is within 3.6km to the SSE, extending southwards along the Exe estuary from its closest point at the junction of Bridge Road (A379) and Glass House Lane |

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| (v) | <ul style="list-style-type: none"> • East Devon Pebblebed Heaths (SSSI/SPA) is around 11km to the SE • Dawlish Warren (SSSI/SAC) is around 12.8km to the South • In accordance with the South-East Devon European Site Mitigation Strategy, residential developments within 10km of the SPA/SAC areas are required to make financial contributions to mitigate the impacts of additional recreational pressures. | |
| | If YES to b(i), is the proposed development 'Schedule 2' development, as the applicable thresholds/criteria in Column 2 are exceeded/met? | |
| | Yes/No | <p>The thresholds are as follows:</p> <p>(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or</p> <p>(ii) the development includes more than 150 dwellings; or</p> <p>(iii) the overall area of the development exceeds 5 hectares.</p> <p>Thresholds (i) and (ii) are definitely not met. Threshold (ii) requires closer scrutiny.</p> <p>Whilst the proposal is for residential development, this is not in the form of dwellinghouses (which are within Use Class C3 of the Use Classes Order. As Purpose Built Student Accommodation (PBSA), the use is <i>Sui Generis</i> and does not include units that meet the definition of dwellinghouses. PBSA can be delivered in many forms, including studios and 'cluster flats', both of which can be compared to some extent with dwellinghouses, but which generally also benefit from more communal areas and shared facilities which a typical dwellinghouse does not. The generally accepted metric for PBSA is bedspaces, which is the total number of persons accommodated by the development rather than the number of dwellinghouses (each of which can accommodate a varying number of bedspaces). In this case 310 bedspaces are proposed.</p> <p>The applicant has suggested that a ratio of 2.5 bedspaces per dwellinghouse is used to generate a proxy figure. This is equivalent to 124 units, and as such the development would not be considered Schedule 2 development. Officers have been unable to identify any guidance on this issue for use for EIA screening purposes, but note that the HDT measurement rule book arrives at a figure of 2.5 for housing delivery monitoring purposes. However, this figure is arrived at because it is the national average number of students in student only households, and '...has been calculated by dividing the total number of students living in student only households by the total number of student only households in England'. Whilst</p> |

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| | | <p>this is helpful, a significant proportion of English student households are likely to be housed in HMOs rather than PBSA, and this may mean that this ratio is not sufficiently robust to be used for EIA screening purposes.</p> <p>In response to a query on this point, the agent supplied two screening opinions for PBSA adopted by London Authorities. One opinion helpfully clarifies that London Plan policy H1 also adopts 2.5:1 as a ratio for housing delivery monitoring. As one of the opinions was 550 bedspaces (220 dwellings at 2.5:1), this was considered Schedule 2. The second opinion is comparable to the proposal being assessed through this opinion, at 300 units (120 dwellings at 2.5:1).</p> <p>In the absence of legal guidance and a locally evidenced or adopted ratio, and given that the 2.5:1 figure for the development of 124 is not significantly below the threshold of 150, a precautionary approach has been adopted. This also appears to have been the approach taken by Tower Hamlets in one of the two opinions submitted by the agent. As such, for the purposes of this screening opinion, the LPA has assumed that threshold (ii) ('the development includes more than 150 dwellings') is exceeded by the 310 bedspace proposal. On this basis, the proposed development is Schedule 2 development. However, the LPA is prepared to consider further evidence in this respect once the screening process has been concluded, or at any future date if further guidance or legal precedent comes to light.</p> |
| (vi) | <p>If YES, which applicable threshold/criteria?</p> <p>(ii) the development includes more than 150 dwellings</p> | |
| (vii) | <p>Screening for Schedule 2 development taking into account information provided by the applicant, the results of any relevant EU environmental assessment and Schedule 3 criteria that are relevant to the development – if YES to b(iii) or b(v)</p> | |
| Questions (taken from Planning Inspectorate screening checklist 2017) | <p>Answer and explanation of reasons (Yes/No or Not Known or N/A)</p> <p><i>Briefly explain answer and, if applicable and/or known, include name of feature and proximity to site</i></p> | <p>Is a significant effect on the environment likely taking into account the magnitude & spatial extent (including population size affected), nature, intensity & complexity, probability, expected onset, duration, frequency and reversibility of the impact, as well as cumulative impacts with other</p> |

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| | | | <p>existing/approved development and the possibility of effectively reducing the impact? (Yes/No or Not Known or N/A)</p> <p><i>If No, state any features and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment</i></p> |
| 1. Natural Resources | | | |
| 1.1 | Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area? | No | No. The site is very small and a high % of the site is already developed. |
| 1.2 | Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply? | Natural resources will be used during the construction and operation of the development, including land, soil, water and non-renewable energy resources. However, as a typical urban development, resources in short supply are unlikely to be needed. | No – the project will not use natural resources that are in significant short supply. Whilst some resources are non-renewable, none are likely to be unusual for a development project such as this and sustainable design and construction methods will be required in accordance with Exeter Core Strategy Policy CP15. |
| 1.3 | Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, | No | No |

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| | water/coastal, fisheries, minerals? | | |
| 2. Waste | | | |
| 2.1 | Will the project produce solid wastes during construction or operation or decommissioning? | Yes – demolition will give rise to significant amounts of waste and the scope to reuse on site will be limited | No – whilst the waste generated will have embodied carbon impacts, there are plentiful opportunities for recycling and reuse in the subregion |
| 3. Pollution and Nuisances | | | |
| 3.1 | Will the project release pollutants or any hazardous, toxic or noxious substances to air? | Perhaps. There is significant potential for asbestos in post-war commercial buildings. | <p>No – even if toxic substances like asbestos were to be found in the building the regulatory arrangements for their removal and disposal are sufficiently developed to avoid significant effects.</p> <p>A Waste Audit Statement will be required in accordance with the policies of the Waste Planning Authority – Devon County Council, to ensure that construction wastes and operational wastes are managed in a sustainable manner.</p> |
| 3.2 | Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation? | Yes. Noise and vibration, are likely during demolition and redevelopment and there is also potential for disruption from site safety lighting. | No, the pollution issues are unlikely to result in significant effects in a busy city centre. |
| 3.3 | Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea? | Potentially. ECC mapping shows the central courtyard to the existing building to be an area where this is potential contaminated land. Mapping also shows a potential bomb/ crater point to the east of the site on Russell St. | No – even if contaminated land were found beneath/around the building the regulatory arrangements for its monitoring and remediation are sufficiently developed (subject to planning controls) to avoid significant effects. |

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| 3.4 | Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project? | Yes – the roundabout and both main roads to the north and south of the site form part of the Air Quality Management Area. The screening request is however supported by a preliminary technical note (Appendix 2) using figures from ECC's automatic analysers and Nitrogen dioxide diffusion tubes, presented in their Air Quality Status (AQS) report dated 2022. The report selects the closest monitoring locations to the site and demonstrates that there have been no exceedances in the annual mean Nitrogen dioxide levels between 2017 and 2021. | <p>No, the development itself will not worsen the air quality and in fact will likely improve it. The screening request confirms that there will be little or no car parking as part of the development (disabled only), and as such the development will impact positively on this (compared to the existing office use to which many commuters could still travel by car).</p> <p>Future residents will however, need to be protected from the potential health impacts of exposure to polluted air.</p> <p>The submitted screening letter states that the planning application will be supported by an Air Quality Assessment in accordance with recognised guidance.</p> |
| 4. Population and Human Health | | | |
| 4.1 | Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning? | Yes – risk of accidents to construction workers during the construction phases of the development. | No – The risks are not considered to be significant provided the proper controls are in place via conditions placed during the application stage. Any accidents are likely to be confined to the site. |
| 4.2 | Will the project present a risk to the population (having regard to population density) and their human health during construction, | Yes – dust/particulates during construction could present a risk to the population of residential uses in the vicinity, where the air quality is already comprised by vehicle exhaust emissions (the | No – this impact will not have a significant effect on the environment as it can be controlled through measures in a Construction Method |

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| | operation or decommissioning? (for example due to water contamination or air pollution) | <p>site is within an Air Quality Monitoring Area).</p> <p>There is also potential for asbestos exposure for construction workers.</p> | Statement required via condition at application stage. Even if toxic substances like asbestos were to be found in the building the regulatory arrangements for their removal and disposal (albeit not controlled through planning) are sufficiently developed to avoid significant effects. |
| 5. Water Resources | | | |
| 5.1 | Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk? | No, although the site sits in a dip such that it is at minor risk of flooding from surface water sources, the only water pathways would be via the sewerage system. | No. |
| 6. Biodiversity (Species and Habitats) | | | |
| 6.1 | Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature | <p>Yes, as described earlier in this statement of record, there are several SSSIs in the vicinity. Of particular relevance are those subject to internal protection which are:</p> <ul style="list-style-type: none"> - Exe Estuary Ramsar/Special Protection Area - East Devon Pebblebed Heaths Special Area of Conservation and Special Protection Area - Dawlish Warren Special Area of Conservation | Yes. In addition to their importance to marine and avian species, these areas are popular recreational destinations for local residents. Increases in population therefore have the potential to give rise to significant effects. However, there is already a management framework in place in the form of the South-East Devon European Site Mitigation Strategy, which has been agreed by the relevant Local Authorities and Natural England. The development would need to make a |

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| | reserves or parks. (Where designated indicate level of designation (international, national, regional or local))). | | <p>contribution to mitigate its impacts, but with this in place, no significant effects would arise.</p> <p>The screening letter states that the application will be exempt from BNG. This is something that the LPA will determine during the ongoing pre-application process, but either way no significant effects are envisaged.</p> |
| 6.2 | Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting, over-wintering, or migration, be affected by the project? | <p>The screening request refers to survey work undertaken. Whilst this concludes that the building is not currently used by roosting bats or nesting birds, it acknowledges that it does some minor potential value as habitat for both.</p> <p>More significantly, as discussed above, any species using the relevant (internationally designated/protected areas) areas could be affected by increased recreational pressure. Bird life could also be affected by the construction of additional tall buildings.</p> | <p>Subject to the South-East Devon European Site Mitigation Strategy, which has been agreed by the relevant Local Authorities and Natural England, and to which the development would need to make a contribution to mitigate its impacts, no significant effects would arise. In respect of birdlife, the building would be sited in the city centre amongst other taller buildings and as such would not be sited so sensitively that significant adverse effects would rise.</p> |
| 7. Landscape and Visual | | | |
| 7.1 | Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which | <p>Yes – The city lies in a valley and the green hills – particularly to the north – are protected as part of its landscape setting through the Development Plan. Any tall building has the potential to impact on this.</p> <p>Due to the proposed height also has the potential to impact on views from outside the city of the city centre and the Cathedral.</p> | <p>Whilst there is potential for significant effects from a tall building in this location (on both the setting of heritage assets and the city's landscape setting), the screening letter and appendices refer to work undertaken through pre-app which</p> |

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| | <p>could be affected by the project? Where designated indicate level of designation (international, national, regional or local).</p> <p>(NB. See question 8.1 for consideration of impacts on heritage designations and receptors, including on views to, within and from designated areas.)</p> | | <p>has assessed the visual impact. The request limits any building on the site to 72mAOD, and compares this to adjacent buildings and other tall buildings in the city. The building would exceed the height of adjacent buildings The Leonardo Hotel (57.24) and Central Living (62.3), but due in part to its siting within a dip it would be comparable to The Depot (100m to the NNE, 71.3m) and lower than both the cathedral spire (76.76) and John Lewis (82.02).</p> <p>Overall, whilst it is the height of the building that is most likely to give rise to significant effects, in this location and at the height proposed, significant effects are considered unlikely. Policies of the Development Plan would also allow the height to be resisted if further work did reveal harm to the Landscape Setting or Heritage Assets.</p> |
| 7.2 | <p>Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p> | <p>Yes. The building is sited in a prominent position at one of the city's busiest roundabouts. Whilst this location is in a topographical dip which allows for more storeys to a specified AoD height than other locations, there is no doubt that it would be very prominent from the immediate vicinity.</p> | <p>No, the visibility of the building itself is unlikely to result in significant effects, it is only if it obstructs important heritage assets in the townscape or strategic landscape setting that significant effects would arise. Whilst this does still need careful consideration it is considered that the</p> |

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| | | | Development Plan policies offer sufficient safeguards to ensure that such harm would not arise. |
| 8. Cultural Heritage/Archaeology | | | |
| 8.1 | Are there any areas or features which are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local). | <p>Yes, there are numerous heritage assets within the (Roman) city centre, including numerous Scheduled Ancient Monuments, the closest of which are as follows:</p> <ul style="list-style-type: none"> • Exeter City (Roman) Walls – linear, 350m to the WSW at closest point) • Underground Passages - linear, 360m to the WSW at closest point) • Rougemont (Exeter) Castle 490m to the West, and • Part Of The Roman Town Of Exeter, Beneath Cathedral Green, 530m to the South West). <p>There are also listed buildings and Conservation Areas nearby. The nearest Listed Buildings are the G2 terrace of buildings immediately adjacent to the SE on Heavitree Rd, which are also within the Lower Summerlands Conservation Area at its closest point (this also contains Listed Buildings at Lower Summerlands east of the site). Land immediately to the west/SW of the roundabout is also within the Southernhay And The Friars Conservation Area.</p> <p>There are also other heritage assets further away from the site that are of strategic significance. Most notable is the Grade 1 listed Cathedral, views of (and setting of) which could be impacted by tall buildings.</p> | See comments at 7.1 above. |
| 9. Transport and Access | | | |
| 9.1 | Are there any routes on or around the location which are used by the public for | The building is surrounded by roads but none would be affected by the development. | No. |

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| | access to recreation or other facilities, which could be affected by the project? | | |
| 9.2 | Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project? | The roads and roundabout surrounding the site are some of the busiest in the city and already suffer congestion. | No, as set out elsewhere in this statement of reasons, the development is likely to reduce the number of trips by car due to the limited car parking provided (and the fact that the existing office use is a trip generator). |
| 10. Land Use | | | |
| 10.1 | Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation. | Land uses around the site are mixed, including commercial, leisure and residential (including supported housing opposite). However, the proposed residential/commercial/community use would be compatible with these. | No, the proposed use would be compatible with surrounding uses. |
| 10.2 | Are there any plans for future land uses on or around the location which could be affected by the project? | Yes. The area is part of an emerging allocation in the Local Plan known as 'Eastgate' in which a mix of high density uses are envisaged. However, none of these are incompatible with the proposal. | Despite being part of a much more extensive redevelopment area, there is no reason to believe that these future uses will be affected by the development. |
| 11. Land Stability and Climate | | | |
| 11.1 | Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which | No | No, although the issue of micro climate surrounding taller buildings may need to be considered. |

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| | could cause the project to present environmental problems? | | |
| 12. Cumulative Effects | | | |
| 12.1 | Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase? | The area is part of an emerging allocation in the Local Plan known as 'Eastgate' in which a mix of high density uses are envisaged. There are also other high density developments consented in the vicinity (eg Co-Living at Summerland St). | Despite being part of a much more extensive redevelopment area, there is no reason to believe that these future uses will result in significant effects just because of their quantum. Furthermore, it is not currently envisaged that there would be so much development taking place concurrently that significant effects would arise. |
| 13. Transboundary Effects | | | |
| 13.1 | Is the project likely to lead to transboundary effects? (NB. The Regulations require consideration of the transboundary nature of the impact. Due to the England's geographical location the vast majority of TCPA cases are unlikely to result in transboundary impacts.) | No | No |
| c | Is the proposed development 'EIA development', as it is either Schedule 1 development or Schedule 2 development that is likely to have significant effects on the environment by virtue of its nature, size or location? <i>(If yes, an Environmental Statement is required)</i> | | |
| | Yes/No | No | |

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| Part 3 | Summary and Conclusion |
| a | Schedule and category of development: |
| | Schedule 2 10(b)(ii) Urban Development project of more than 150 dwellings (depending on bedspace to dwelling ratio assumptions). |
| b | Conclusions – according to EIA Regulations Schedule 3 |
| | It is concluded that there are only two areas in which there is potential for significant effects: increased recreational impacts on nearby internationally designated wildlife sites, and impacts on the city's |

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| | landscape setting and townscape/heritage assets due to the height of the building proposed. However, an established mechanisms is in place to mitigate the former, and the policies of the development plan itself are considered sufficient to prevent significant effects arising as a result of the latter. As such, an EIA is not considered necessary. | |
| c | Is an Environmental Statement required? | |
| | Yes/No | No |
| d | (Subsequent applications only) Was an ES submitted for the related PP and is the environmental information adequate for the current application for approval of RM/conditions? | |
| | N/A | |

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| Case Officer | John Douglass |
| Date | 02 December 2024 |