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Dear Chris

**PROPOSED CO-LIVING LIVING SCHEME, FORMER GARAGE AND 81 VICTORIA STREET, EXETER
(APPLICATION REFERENCE 23/0949/FUL) – REVISIONS TO SCHEME**

We refer to recent discussions regarding the planning application which seeks approval for the construction of a co-living scheme at Victoria Street. During these discussions, officers indicated that the Council was unlikely to support the proposed scheme due to a number of concerns relating to its design and its likely impacts on adjacent residential properties.

In light of these observations, our clients have instructed us to submit a number of revisions to the proposals, with the changes made intended to address the various concerns. We therefore have pleasure in enclosing the following:

- Full suite of revised scheme drawings prepared by the architects, ECE Westworks.
- Revised landscape drawing and planting schedule, prepared by Steele Landscape Design.
- Design and Access Statement Addendum (March 2024) prepared by ECE Westworks.
- Revised Daylight and Sunlight Report (26th March 2024), prepared by Delva Patman Redler.
- Townscape and Visual Analysis (Updated March 2024) prepared by Define.
- Updated Noise and Vibration Assessment (26th March 2024) prepared by Matrix Acoustics.
- Updated Ecological Assessment (26th March 2024) prepared by Tyler Grange.
- Transport Statement Revision A, prepared by Entran.

We attach a schedule of revised drawings to this letter.



The Changes Proposed

The changes now proposed are intended to address the Council's specific concerns as well as a number of technical comments made by consultees to the scheme.

In summary, the total number of co-living units has been reduced to 89, from the 101 originally proposed. Each of the studios would be a minimum of 20sqm in area. It is also now proposed that 20% of the units would be provided as affordable private rent. Seven of the studios would be larger, accessible units.

The northern block has been substantially reduced in height so that it would now be viewed as three storeys in height (Ground plus two storeys) along the bulk of its length. This has substantially reduced the mass of this part of the scheme (from Ground plus three and four storeys) and the potential for a sense of enclosure and shading to the gardens of the houses on Prospect Park to the north.

The middle block has also been substantially reduced in height by one storey (to Ground plus one storey) across its length, having previously been Ground plus two and three storeys). In addition, the layout has been comprehensively altered, with the deck access arrangement removed. The units on the upper floors have been re-oriented and an internal corridor inserted on the southern side to remove the risk of overlooking towards Victoria Street. The second floor fenestration design of this block has also been revised with opaque, slit windows proposed along the corridor. Collectively, these changes minimise the sense of enclosure and potential for loss of privacy to the rear of the residential properties to the south (No's 77 to 80 Victoria Street).

In respect of the eastern side of the scheme, which fronts the railway line, it is proposed that additional accommodation be provided which, in effect, would infill some of the space between the main blocks, raising these to Ground plus two storeys (from the Ground plus one storey originally proposed). Being more remote from existing houses and from street level views, these changes are unlikely to have any impact on the character or amenity of the wider area.

A number of other changes have been made, notably:

- The size of the southern rooftop amenity space provision has been increased slightly. Given the reduction in the size of the scheme, the provision of roof top amenity space is considered ample to meet the needs of the residents without the need to rely wholly on any ground floor provision. However, two ground floor courtyard areas are still proposed for resident's use.
- The internal layout has been amended, partly to address some of the comments provided by officers. Access from the street would now be via a controlled gate, with circulation into the interior being more controlled through the inclusion of an enclosed corridor connecting the entrance to other parts of the building. The laundry has been relocated, given a more usable shape and slightly enlarged.
- The bin storage has been re-sited to the western end of the middle block and also enlarged so that it is now capable of accommodating 10 x 1100 litre bins (five each for waste and recycling).
- Architectural changes. Brick is still proposed, with a range of different brick types proposed. However, the overall external design treatment has been simplified.
- A high quality landscaping scheme, which includes details of the roof top amenity areas, is proposed. With the exception of the areas set aside for residents amenity use, green roofs are proposed throughout the scheme, with these also be used to accommodate PV arrays.



Description of Development

As a result of the changes, we would request that the description of development be formally revised to read:

“Demolition of existing buildings and dwelling and redevelopment of site to provide 89-bed co-living accommodation with associated accesses/egresses, landscaping and other external works.”

Analysis of Revised Scheme Impacts

It is considered that with the revisions now proposed, the scheme would have an entirely acceptable relationship with adjacent properties and would respect the character of the area. The key technical reports have been revised to consider the potential impacts of the scheme and the conclusions are summarised below.

Townscape

Define have completed a review of the scheme changes and the implications of these on local townscape. Appendix 1 of their analysis provides details of the work they have done to consider the implications of scheme changes. Within this part of the document, they consider the design changes proposed and updated policy relevant to the location and form of new housing.

The assessment considers the changes in relation to the various key viewpoints previously identified i.e. from the immediately adjacent roads (Victoria Street, Springfield Road, Prospect Park and South View Terrace) and from Old Tiverton Road, May Street and Well Street. Reference is made to the different massing options originally considered and in particular to the ideal massing option (Option D) identified in the original analysis.

The assessment summarises the impact of the revised scheme on each of the key views (see Wireline Comparison Table) and this notes the differing degrees of visibility in each and with reference to the context. The Conclusion section draws together the main points of Define’s analysis. In this regard, paragraphs 7.34 to 7.36 are key:

“The March 2024 scheme has worked with the principles of the Townscape Assessment and has reduced numbers of units and reduced storey heights...This has also allowed the architect to create a massing which is more reflective of the location between a strong character area and views to [the] tall building south of the railway.

...the current scheme conforms with the design principles set out in this report and represent an enhancement to the previous proposals...The March 2024 scheme proposes an urban form that assimilates successfully into the wider townscape character, mitigated by the limited nature of the views to which the site is subject.” [our emphasis]

Loss of Privacy and Outlook

The architect’s Design and Access Statement Addendum (DASA) assesses the scheme’s impact in relation to potential privacy and outlook impacts and with reference to the guidance set out in the Council’s *Residential Design Guide*. Please refer to Section 2.15 of the DASA.



In relation to privacy issues, the DASA analyses the specific relationship of different parts of the scheme with the adjoining properties on Victoria Street, Culverland Road and Prospect Park and with reference to the key guideline that for privacy, a minimum of 22m window-to-window distance be achieved. The scheme now meets this requirement in all respects. The key concern identified previously – the potential for loss of privacy to the rear of the houses on Victoria Street – has been addressed via the internal changes to the scheme's middle block and the use of opaque slit windows along the access corridor.

In relation to the potential for loss of outlook, the DASA analyses the specific relationship of different parts of the scheme with the adjoining properties on Victoria Street, Culverland Road and Prospect Park and with reference to the key guideline that where blank walls are proposed, a minimum distance of twice the height (ground to eaves) to the adjacent property should be achieved.

As the analysis within the DASA shows), it is arguable that the scheme would generate an improvement in outlook the rear of the houses on Victoria Street as a result of the removal of the existing garage building and its replacement with the middle block. The height of the middle block has been substantially reduced as part of the changes and is set further back than the existing garage building.

The analysis also shows the middle block would also have a comfortable relationship with the houses on Culverland Road to the west. Although the distance to the rear of the rear extensions of these buildings would be below the SPD guideline levels, the effect (on loss of outlook) would be diminished given that the block presents only a narrow frontage. Furthermore, when measured to the rear of the main parts of these buildings, the distance from the middle block exceeds the SPD guideline distance.

The scheme meets the SPD outlook guidelines in all other respects and with respect to other existing properties in the area.

As this analysis shows, the revised scheme is very unlikely to generate any significant harm to the amenity of local residents and is in fact likely to generate some improvement. This strongly supports the view that the scheme is of an appropriate design and one which is compatible with the character of the area.

Sunlight, Daylight and Overshadowing

The sunlight and daylight report which has been completed considers the impact of the revised proposals in relation to internal light levels and the effect on adjacent properties.

Internal Light Levels

The key conclusions are that in relation to light levels within the scheme, Section 9 of the report confirms that 89% of the rooms would benefit from daylight levels in excess of the BRE guidelines and 99% would exceed the required BRE sunlight levels.

Light Levels at Adjacent Properties

In relation to the nearby properties (i.e. those on Victoria Street, Culverland Road and on Prospect Place), Section 10 considers the expected impacts.

In relation to daylight, the report notes (paragraph 10.4) that daylight received by 93% of the windows and 94% of the rooms in nearby properties would exceed the required BRE levels.

In relation to sunlight, the report that notes (paragraph 10.36) that 99% of the rooms in nearby properties would meet the required levels, with the single remaining room failing by only a small margin.



The report also considers (paragraph 10.38) the likely impact of the scheme on light levels in neighbouring gardens. It notes that as a result of the removal of the trees along the northern boundary of the scheme, the amount of sunlight received by the gardens to the north, i.e. those belonging to houses on Prospect Place, would actually increase as a result of the scheme.

The results of the daylight and sunlight study are entirely commensurate with what is to be expected of a development within a central urban location.

Noise

The updated noise and vibration assessment issues considers the impact of these matters on future residents of the scheme.

In line with comments requested by the Council's environmental health officer, a wholly new survey has been undertaken in order to assess the current noise environment and with the specific aim of capturing current noise patterns from the adjacent railway line and also noise arising from the adjacent football stadium. To this end, noise surveys were carried out on 16th March 2024 (at the time at which Exeter City FC played Burton Albion and which was a well attended match) and between 19th and 21st March 2024. Noise monitoring was undertaken from four positions, on the eastern edge and within the site.

The details of the results are set out within Section 4 of the report. The assessment confirms (Section 4.8) that noise levels within the external amenity areas (both the courtyard and roof top areas) will be acceptable. Balustrades on the eastern elevation of the roof top areas could be used to reduce noise levels further.

Internal noise levels (Section 4.9), even allowing for peak noise associated with the football club, will also be acceptable. The assessment recommends the use of façade sound insulation for the eastern elevation with Table 3 of the report providing details of the measures needed. With the use of these measures, internal noise levels are considered to be acceptable. The report notes the possibility of windows on the eastern side needing to be open during the night to address overheating for example during the summer. To address this in a way which manages nighttime noise, the assessment indicates that mechanical ventilation could be used to serve this part of the scheme in order to allow windows to remain closed at night whilst still ensuring the relevant rooms remained cool.

Section 5 considers likely vibration impacts on the scheme and confirms that a vibration survey was carried out on 20th March 2024. The assessment notes that vibration levels are likely to be very low and these will not adversely impact scheme residents.

Section 7 summarises the work carried out and the results. It concludes that:

“On the basis that through design (facade sound insulation and the inclusion of mechanical ventilation if required) acceptable internal and external noise levels can be achieved combined with the absence of adverse vibration effects, we conclude that on noise and vibration grounds the site is suitable for residential development.”

Transport



The Transport Statement (TS) provided as part of the application has been updated to consider possible implications arising from changes to the building design. Given the car-free nature of the scheme and its highly sustainable location, the TS's key conclusions, that the scheme is wholly acceptable from a transport perspective, remains. However, tracking requirements for large refuse vehicles and for large fire tenders have been reviewed and the relevant diagrams are set out at Appendix C of the TS. These confirm that the required tracking is provided for as part of the layout. Fire vehicles can access the interior, rear of the scheme whilst refuse vehicles are able to reverse into and then leave the site in forward gear.

Ecology

The Ecological Assessment provided as part of these revisions has been updated to address comments provided by the Council and to provide some clarification on some additional matters. Notably, the Assessment confirms that the additional bat survey identified by the Council's ecologist as being needed, was in fact carried out in 2023 with the results not affecting the conclusions, with no evidence of roosting bats and only low levels of bat foraging observed. The previous conclusion, that the site is of limited importance to bats, remains.

In all other respects, the conclusions remain the same in that the site is of limited value overall. The assessment concludes that the scheme would have no significant impact on ecology and that measures could be used to protect such species as are present on the site for example the use of a Construction and Ecological Management Plan (CEMP) during the construction phase. It is still recommended that provision is made for the installation of bat and bird boxes within the scheme building. These measures could be delivered through the use of suitably worded planning conditions to any grant of planning permission.

The Summary section of the assessment reviews the current position including the points outlined above.

Operational Management Plan

It is acknowledged that an operational management plan may be required to support the scheme and to provide comfort on matters such as delivery patterns, moving-in/moving-out, control on occupation and so on. The applicants would be happy to draw up and provide this as part of the application in due course.

Conclusion

In summary, the changes now proposed are considered to address officer's previously stated concerns and to provide a scheme which would sit comfortably within its surroundings. The supporting technical analysis provided and summarised above unequivocally demonstrates that the proposals would not generate any material harm to the amenity of nearby residents. This evidence supports our view that the scheme would represent an appropriate form of development.

The architectural and townscape analysis also shows that the form and layout of the scheme would be appropriate to the scheme's high density residential location and its position very close to the buildings at Exeter City Football Club.

Officers will obviously appreciate that there is a strong imperative within both the adopted and emerging development plan to optimising the use of brownfield sites in sustainable locations - such as is proposed in this instance - to bring forward new forms of housing such as co-living. These objectives are strongly supported by policies set out in the newly revised NPPF. In addition to helping meet the need for more co-living in the city, the scheme would also provide affordable housing for which there is also a strong need.



Our clients remain strongly committed to delivering a high quality redevelopment of this site. We are strongly of a view that the scheme as now envisaged represents a high quality and carefully designed proposal which would deliver considerable benefits. We would therefore request that these proposals be considered positively and we look forward to discussing the scheme further with you.

You will no doubt wish to reconsult on these changes ahead of any determination and we would be happy to discuss any additional time which the Council might need in this regard.

Yours sincerely

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