

DPP Planning
Sophia House
28 Cathedral Road
Cardiff
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10 October 2024

By email
info@dppukltd.com

Ref.: Former Police Station and Magistrate Court Site in Exeter

Dear Staff at DPP Planning,

Thank you for making material available at the exhibition on 25 September and adding more details (except the requested floor plans with measurements) on your website afterwards. References below are based on your pre-application file, as published by Exeter City Council on their planning website, to which we have been asked to comment.

Exeter Civic Society sees what is presented for the new round of consultations as a huge improvement to the previous design, which we objected to. The proposals are much more in line with the surrounding area, with eight separate blocks and a significantly reduced number of rooms providing less impact to the street scene and neighbours. The positioning and direction of the buildings relate better to elements of the surroundings. We are pleased you replaced the inadequate concept as 'a gateway' by one interpreting the site as bridging between two decisively different conservation areas (Mont le Grand and Summerlands), and then 'taking inspirations from their characteristics' (p.49).

But we still have some concerns which we want to express in our response to your consultation.

Though the height of the scheme overall is reduced, and a stepped approach is taken now, with broken-up roof structures adding to this decreased massing, the overall impact of the development is still an issue in some respects. On the Higher Summerlands side, the Co-living block 3 is still higher than Block 2, despite it being closer to some of the houses (No. 8 and 9) in Higher Summerlands (p.48, 60). One storey less in the south west corner of Block 2 would continue with your overall stepped approach and allow for less overshadowing and intrusion for the adjoining houses. This block is right on the boundary of what you define as distinctly different massing scales (from domestic scale in the west with Summerlands to medium scale

in the east with the new plot included, pp.45-46) and therefore demands more mediating character binging height and scale more in-line with the residential properties around.

Co-living blocks 2 and 3 are still much closer to the buildings in Higher Summerland than the previous buildings were (compare sketches on pp. 46 and 47). Your suggestion to plant mature trees directly on the boundary, west of the service road (p.43), for concealment reasons could result in reduced light levels for the houses in Higher Summerland significantly. Currently there is a grassy embankment before any trees, which provide much less shading and better light levels coming through to the houses (p.42). We wonder if dense hedging or shrubs up to 2.0m may be better with a few smaller trees.

A similar issue can be found in St Matthew's Close, where the current grassy embankment will make space for the service road. However, here no tree planting is suggested which will result in a less pleasing outlook for residents there (.pp.42-43).

We find it misleading when you speak of 'loss of some trees' (p.66). You list 14 trees which will be lost on the southern and western side of the plot, many of which are of course mature. And when you mark the lost trees in your sketch (p.66) you can see that it affects the south-west and west boundaries – another indicator, too, how much closer Co-living blocks will be to Higher Summerlands.

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95%

6.3 trees, root protection areas and biodiversity net gain

existing gap is bigger than new one

6.3.1 trees and root protection areas

As part of the refused application Advanced Arboriculture produced a tree survey, this will be updated as part of the new application.

The buildings have been designed to retain as many trees as possible, however loss of some trees will be required to allow for the new development and cycle path, these will be replaced through the planting of new trees.

Trees that will be removed are as follows: T1, T2, T3, T4, T5, T6, T7, T8, T11, T13, T15, T23, T24, T25.

6.3.2 net biodiversity gain

The application will achieve a minimum of 10% net biodiversity gain over the site. This will be achieved by:

- retention of existing biodiversity where ever possible
- introduction of green roofs throughout
- introduction of new high quality trees and planting
- just of native plant where ever possible
- use of permeable hardstanding such as grasscrete where possible



You confirmed at the exhibition that the closest distance windows in the Higher Summerland properties to the blank gable would be 7m and window to window 18m within the development area. This is less than recommended in the Exeter Design Guide (page 3) has for residential housing (12m, 22m). Unfortunately, the pre-application consultation document does not show any measurements demonstrating these distances, but we consider that co-living accommodation, whilst similar in design to student accommodation, is in fact residential. You said at the exhibition that you wanted to factor in the adequacy of your design for potential changes of use, and that one alternative use would be residential (alongside student living). You also said that with the different Exeter design guide requirements you would want to look into this again. We hope you will make adjustments to meet the Exeter rules for distances between residential blocks in your design. We must also point out that the BREAM guidelines discuss new development being repurposed in the future, so if this is already part of your thinking, meeting the distance standards is essential to ensure any future family accommodation will be compliant.

We discussed the widened pavement on Heavitree Road as a feature which would enable the possible bus-route along your buildings. From your drawing on p.67 it is obvious that the footing of Co-living blocks 1 and 2 would not leave enough room for any adequate footpath, and obviously all the trees on this stretch would be lost. The proposals should therefore not suggest the possibility of having a bus lane here in future, and this must be made clear in your contacts with DCC, although we hope they will see the improbability of this idea. If you plan for a future bus lane, then the two blocks must move further away from Heavitree Road.

The current suggestion for a shared pedestrian/cyclist layout along Heavitree Road is not compliant with LTN 1/20: the segregation of pedestrian and cycle lane is now the required standard. This will inevitably create a difficulty on the corner of Heavitree Road and Gladstone Road, which as we suggested, should have the main pedestrian crossings in front of Student Block 1 (as this would be the main desire line for students to enter St Luke's Campus). Your idea to look into the landscape design in front of that building seems to be a good solution, as opening up more space there would direct the route for pedestrians further away from the corner and allow for proper pedestrian islands between the cycle lane and the road on both sides of this corner.

We want to challenge your market analysis: the balance between student rooms (399) and Co-living spaces (363), with a more severe reduction of student rooms than of Co-living spaces compared to the previous design, seems to contradict the current and future market situation. With student accommodation no longer available on St. Luke's Campus and the University's plans to grow this campus considerably, we see a higher demand for student accommodation in this area. It should be a warning signal that many of the Co-living rooms in 'The Gorge' are still unoccupied a year after completion.

The floor plans in the Pre-application Consultation document do not provide any measurements of individual rooms, or sketches about how they will be laid out

(pp.59-62). For a 'typical floor' you state 'Co-living units are 22.5 sqm' and student units 'vary in size from 17.5 sqm to 28 sqm' (p.62), without any further explanations. We want to see more details on these issues in any future planning application, especially as you said at the Exhibition that kitchen and washing machine arrangements would be in each co-living unit. As much as we welcome such individual provisions, they seem to undermine the definition of co-living developments. What you suggest is more like small residential flats and that then would increase the alternative use argument you made at the Exhibition. However, in that case the unit size of 22.5sqm is less than what is demanded of one-bedroom flats in Exeter (31sqm).

As for light pollution: we support your idea expressed at the Exhibition of looking into motion sensor technology. This would also save energy.

To sum up our views, we see considerable improvements in the currently presented plans, but we still see need to further adapt the scheme to make it what you deem a high-quality new development.

Yours faithfully

Gert Vonhoff

Chair, Strategic Planning & Highways Group, for ECS Planning Sub-Committee