

John Douglass
Planning Department
Exeter City Council

By email

John.douglass@exeter.gov.uk;
planning@exeter.gov.uk

29 Sep 2025

Ref.:

Site Address: Devon And Cornwall Constabulary, Heavitree Road, Exeter, EX1 2LR
Proposal: Redevelop site for PBSA and Co-living
Application Ref: 25/0676/FUL

Full planning application for the demolition of the existing buildings and erection of mixed-use development comprising Purpose-Built Student Accommodation and Co-Living with associated infrastructure

Dear Mr Douglass,

Exeter Civic Society regards this Full Planning Application as an improved proposal from that which was previously refused by the council, however further amendments and more information is required before we can remove our objection. Concerns remain about the impact on neighbours from overlooking due to distance and height; minimal landscaping; potential to limit ECC and DCC travel plans for Heavitree Road for safe cycling and walking routes and the Zero Carbon Plan. We are also concerned about the minimal provision for people with disabilities which sadly appears to be a feature of co-living and PBSA proposals but with little justification from any analysis of demand.

We understand concerns of local residents who still think scale and massing remains out of character with the surrounding area, and given how much emphasis the Planning Inspector laid on this in his rejection of the previous scheme, we think these concerns have to be taken seriously (for more details see below). The number of units is enlarged again, from 762 in the pre-application to 813 (compared to the 905 units in the rejected application).

The document "Architect Email to Exeter Airport Showing Max Building Heights" shows clearly how the development will dominate the surrounding area. Many of the other visuals show the buildings only in comparison to each other on the site. We therefore ask for some more views from the immediate surrounding area into the proposed building to more clearly understand the impact.

Though the height of the scheme overall is reduced, and a stepped approach is taken, the overall impact of the development is still an issue, particularly overlooking Higher Summerlands. Co-living Block 3 at the rear of the site with its six floors is higher than the Co-living Block 2 at the front of the site, but its gable is closer to

some of the houses (No. 8 and 9) in Higher Summerlands, thus overshadowing them. The plot sits between areas which are defined by the developer as distinctly different massing scales (from domestic scale in the west with Summerlands to medium scale in the east with the new plot included) and therefore it demands a mediating of the height and scale more in-line with the residential properties around, especially on the Higher Summerlands side. St Matthew's Close is overlooked by the 6 storeys of Co-living Blocks 3 and 1. We suggest a stepped approach, bringing down Co-living Block 3 by one storey and also bringing down the northern end of Co-living Block 1.

Also, the Co-living Blocks 2 and 3 are still much closer to the buildings in Higher Summerland than the previous buildings were. The landscaping and tree planting along the service road supposedly softens the impact here, but there is no such softening on the boundary with St Matthew's Close, where the current grassy embankment will make space for the service road. There will be some overlooking between the existing and the upper floors of new buildings. We recommend the applicant should be required to work with ECC to plant a range of trees/bushes on the ECC land to the north of the boundary to provide some screening for the residents there.

For PBSA it is disappointing that Block 3 is 6 storeys but as it faces The Gorge it may not impact many people except for more distant views. With the top floors being within the roof area we think the heights of the other 3 blocks are fine but Student Block 1 would be better with a hipped end to turn the corner of Gladstone Road to Heavitree Road - at present it offers a 'hard' design with the gables facing Heavitree Road. Complaints still cover its impact on the street scene. We do not think the current proposal is good enough. Can this corner building be given an improved design reflecting the corner location with something that helps turn the corner with a rounded or splayed design?

We wonder whether the highway crossing points on Heavitree Road will be adequate to cope with the large numbers of students and co-living occupants. We want to see an improved pedestrian crossing in front of Student Block 1, as this would be the main desire line for students to enter St Luke's Campus. Opening up more space on the corner would direct the route for pedestrians further away from the corner and allow for proper pedestrian islands between a segregated cycle lane and the road. We are especially concerned about this, as the pre-application suggestions on this corner (with seating and a café area) seem to have vanished. The crossing point towards College Road has to be made wider to allow for bikes as well as pedestrians, and probably deeper (2m?) to allow for bikes to stop between the two highways.

The application does not show any measurements demonstrating distances between blocks, or to neighbouring properties. We were advised 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 (p.3) for residential housing (12m,

22m). We consider that co-living accommodation, whilst similar in design to student accommodation, is in fact residential, an argument supported by the design for potential change of use, when the application speaks of repurposing the Co-living units into flats should the proposals not be commercially viable. We therefore expect Exeter City Council to require from the applicant adjustments to meet the Exeter rules for distances between residential blocks. BREEAM guidelines discuss new development being repurposed in the future, so if this is already part of their thinking, meeting the local distance standards is essential to ensure any future family accommodation will be compliant.

The staff and parcel room for the PBSA part is located in Student Block 1, but it does not relate to any parking area for the drop-off of parcels. We recommend that this room is relocated to Student Block 3 or 4 where delivery vehicles will arrive, and possibly where students will be dropped off.

Students should be afforded some security from the public thoroughfare with a fence between Student Blocks 2 and 3 to stop the public wandering in.

Disability provision – the documents outline 21 wheelchair PBSA rooms and 20 in the co-living blocks, presumably providing the required standard of 5% of bedspaces (i.e. a total of 41 residents out of 813) We wonder whether this is adequate, given the actual statistical facts: In 23/24 HESA statistics report 18% of enrolled students declared some form of disability, not all those will require adapted accommodation. Disabled Students UK report 2024 quotes 20% of those students declaring a disability have mobility issues and 31% of disabled students in student accommodation say it does not meet their access needs. We would like to see more clarity on how the proposed plans accommodate for these needs.

Waste bin areas do not appear very generous. In the past this has led to serious problems within plots and littering the neighbouring areas. So a more realistic approach would be welcome.

Framework Travel Plan.

The opening part mentions that the DCC Transport Infrastructure Plan (March 2020) has identified Heavitree Road for the development of more bus lanes (scheme code E14) and that land should be reserved for this, but the application does not make any allowance for this. Co-living blocks 1 and 2 sit much too close to Heavitree Road to allow for an additional bus lane, plus pedestrian and cyclist provision. The DCC plan also recognises the requirements of LTN1/20, and mentions a desire to link to E3 and E9 cycle routes but no connections are proposed unless in the S106 agreement as contributions. With an additional 800+ people walking and cycling in the immediate vicinity, significant improvements are required to the surrounding streets but only limited provision is envisaged by the applicant. If not part of the application, then a suitable S106 sum to address pedestrian, mobility aided, and cycle movement in the local and wider area is required.

In line with Exeter's Zero Carbon Plan, we also would like to see all parking spaces being supplied with EV chargers.

As the Framework Travel Plan goes on, it is clear that it was largely written in 2021 for the previous application with bus timetables in particular out of date and the mentioning of co-bikes and co-cars. The developer must be asked to provide an updated Framework Travel Plan. Actually, we think there should be two of them - one for co-living and one for PBSA with each cohort having different needs and expectations. Co-living occupants need access to a car hire scheme. Although co-cars do not exist any longer, the applicant should make allowance on-site for several cars as we saw for other redevelopments (Haven Banks and Exmouth Junction). The developer has to find some space, possibly by removing some rooms and creating parking spaces at ground level as an undercroft. It is not enough to point out as on p.18 of the Planning Statement that there are several car club spaces in the vicinity (on Gladstone and on College Road); these spaces were put in to cater for the existing housing. The significant increase in residents by the new development must come with its own car-sharing facilities. The developer should be asked to liaise with Co-Wheels which provide a facility for The Hay at Exmouth Junction.

Accessible parking is a legal and ethical requirement under the Equality Act 2010. The proposed provision of only 4 accessible parking spaces for a development with 41 wheelchair rooms. This fails to meet the requirements of the Equality Act 2010, the NPPF, and Exeter Local Plan Policy T10.

Given the number of people who are likely to require accessible spaces 27 should be provided to ensure equitable access and lawful compliance. This can be calculated as 1 space per unit adjusted upward for multi- occupancy assuming 60% of 41 potential residents will need a space, therefore 27 spaces would meet practical demand. There should also be provision for storage of mobility aids such as scooters with suitable recharging facilities. Room for this has to be allocated on site by removing some rooms and having parking spaces in the undercroft of a block.

Yours faithfully

Keith Lewis

Chair

Gert Vonhoff

Strategic Planning & Highways Group