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23 November 2025

Dear Mr Smith

**25/0781/FUL. Mary Arches Street Car Park Mary Arches Street Exeter.
Demolition of multi-storey car park and construction of a co-living development alongside public realm improvements, landscaping, cycle and car parking, servicing, refuse and recycling provision, and associated works (REVISED PLANS).**

The Planning Group of Exeter Civic Society has considered this amended application and would like to make the following response:

This is a response to the revised information submitted in October 2024. We do not consider that the proposed changes go far enough to justify a change to our previous objection to these proposals. We continue to object to the amended application because the applicant has not made adequate changes to the scheme to make it acceptable.

Internal Planning.

Kitchens are now provided at each corner of the two blocks; however, each appears to be significantly undersized, particularly in Block A where they are only 39sq.m to serve its intended purpose and cannot provide a meaningful communal or amenity space for residents.

With many rooms designated for disabled use across the development it is not clear whether the kitchens have disabled users in mind to prevent exclusion. The applicant should submit further information to demonstrate how disabled residents will be able to utilise these facilities. Detailed plans showing a layout for cooking and seating for the proposed kitchens should be submitted to demonstrate how users can share cooking and eating.

In block A, the first floor has two kitchens which seems reasonable. On the 2nd and 3rd floors there are 45 rooms but one kitchen in one corner shown as 39sq.m – we recommend that a second kitchen be provided on the corner near Mitre Lane, or a much larger kitchen/diner in a central position. The plans provided are confusing with a 'white' area – is this part of the kitchen area? On the 4th floor there are 35 rooms but is one kitchen large enough, although on the top floor there are 27 rooms and one kitchen may be adequate.

In block B the kitchens would be more accessible if they were positioned close to the central lift/stairwell. Each floor has a max of 26 rooms but is the kitchen large enough?

There are also inadequate facilities for the gym and fitness studio, with only shared WCs located on the opposite side of Block A, accessible only via long internal corridors. Dedicated support facilities should be provided within or adjacent to the gym to ensure usability and convenience. The communal toilets do not have a wheelchair compliant toilet which should be provided, as well as an ambulant friendly cubicle.

All community amenities are currently located within Block A, with none provided in Block B. The only connection between the two blocks is through a narrow set of doors via the kitchen/dining area which is both impractical and poorly designed. This configuration results in weak functional integration between the two buildings.

The overall internal layouts are poorly considered, with long, dark corridors and limited natural light. These would result in poor-quality internal environments and low standards of amenity and connectivity.

Massing.

The only notable change to the overall massing is the introduction of a rectangular corner element to Block A. While this represents an attempt to define the corner, it does not go far enough to meaningfully reduce or articulate the building's bulk, nor does it adequately respond to the prominence of the corner site.

The proposal includes a partial roof set back; however, the retention of the existing pediments undermines this gesture. These pediments are out of character with the surrounding context and visually add to the overall building height, further increasing its apparent mass. A clear and consistent roof setback should be pursued as a minimum, with the removal of the pediments to achieve a more appropriate relationship with the townscape.

The elevation drawings also indicate the presence of Juliet balustrades to the windows of corner block but there is no clear indication of how these are accessed. As an example, one of the full height windows with a balustrade is off the bathroom with a vanity unit in front of it. This suggests that the corner arrangements have not been resolved or rationalised in the design. We consider that the Juliet balcony railings are inappropriate and do not relate to adjoining buildings – they should be removed from the proposals.

Ground Floor and Amenity Space.

Significant concerns remain regarding the long and inactive ground-floor elevation along the corner of North Street and Bartholomew East. The current arrangement fails to provide active frontage or contribute to a positive public realm experience. The proposed light well at this corner houses an inaccessible display space, the purpose of which is unclear. It does not appear to contribute meaningfully to either active or passive surveillance of the adjacent pedestrian areas. Further information into the use management and maintenance of these spaces should be provided.

Perhaps part of the space could be an interpretation space for the history of the area managed by RAMM or others?

The developer could perhaps consider suggestions in our North Street revision previously submitted which at paragraph 3.2.b, we suggest:

- To fit out and maintain the newly suggested full height glazed display areas on the corner for displaying interpretation/information boards and historic models of the street which will help to recapture and reimagine the street identity. Information about the Roman Wall (currently only on the opposite corner of the crossroad) needs to be added to, thus highlighting the medieval and early modern history, as well as C19 alterations and additions. Tourists and day visitors could be guided down the street to this interpretation material and start their exploration of the wider area from here.

Servicing.

We do not consider that the provision of the two disabled parking spaces at Synagogue Way is adequate for the number of disabled rooms proposed in this development. More should be provided and the applicant should provide evidence to demonstrate that just two places are adequate.

We still do not accept that the proposed suggestion of resident parking in the Guildhall car park is acceptable. For example, the city council closed access to this car park from 17 – 21 November for maintenance. A similar closure for access would leave residents without a parking space, and the car park is of course closed between 11PM and 8AM.

Whilst the applicant proposes the use of the existing layby on Bartholomew Street East for refuse collection, resident drop-off/collection, and deliveries, we still assert that the pavement should be aligned to the highway and a private lay-by established for these functions on land controlled by the applicant rather than public highway. The servicing of the site can be supplemented by the use of loading bays on North Street but positioned to the east of the site, and in-line with our recent submission to support a new vision for North Street. Refuse collection should take place in a lay-by on Bartholomew Street East.

We still have concerns about the servicing of deliveries and drop-off/collections to block B. The location of our proposed delivery point off Mary Arches Street has been used for disabled parking which could result in delivery vehicles stopping in Mary Arches Street in contravention of the current 'no parking' restrictions. The Highway Authority should be asked to comment upon this scenario. We still consider that a drop-off layby should be provided in Mary Arches Street.

Finally, we have concerns about the justification by the applicant for the need of more co-living accommodation in Exeter. There is currently planning approval for 1066 co-living rooms, as demonstrated in the table below. Does the Exeter Housing Needs assessment really show the need for more than 1066 single person flats/rooms for the foreseeable future? We hope that the planning officer will comment upon this in their report to the planning committee in respect of this planning application. With this in mind, it is crucial that the applicant submits proposals for the re-purposing of this accommodation for alternative residential use should proposals for co-living not proceed, or if built, it is not possible to find sufficient tenants to make proposals viable. We do not believe such plans have been provided despite this being a requirement of the emerging Exeter Plan.

Co-Living – Built Accommodation	
The Gorge	134
TOTAL	134
Exland house Tudor Street	34
Summerland St/Red Lion Lane - commenced	145
Harlequins Centre	383
Water Lane South – outline approval	320
Haven Banks/Water Lane – outline approval	184
TOTAL	1,066
Mary Arches	300
Heavitree Rd Police Station	414
TOTAL	714

I provide an addendum and summary of our previous comments below.

Yours sincerely

K Lewis

Keith Lewis. For the Planning Group of Exeter Civic Society

Addendum and summary of our previous comments.

1. Civic Qualities & Street Engagement

- Lacks civic quality, contextual awareness, and sustainability expected for a prominent, historic site.
- Fails to address both the immediate and wider urban context despite being a key city gateway.
- The main entrance on North Street creates a 2m level difference along Bartholomew Street East, resulting in a long, inactive elevation with blank façades and poor street definition.
- The separate disabled entrance is not in the spirit of a communal building. Moving the entrance to the corner would allow that.
- Needs stronger architectural articulation (e.g., recessed corner or setback entrance) for civic presence.

2. Contextual Response & Conservation Area

- Fails to preserve or enhance the area's character, architectural quality, and historic importance.
- Overbearing massing with little articulation or sensitivity to neighbouring properties and views.
- References to local vernacular appear generic and repeated, lacking site-specific adaptation.
- Missing the fine-grain detail, proportion, and craftsmanship typical of surrounding context.
- Does not show how the building contributes positively to the historic streetscape.
- Insufficient consideration of nearby heritage assets: the city wall, the iron bridge, and the former north gate site (marked by the Wyvern weathervane).

3. Design Quality & Massing

- **Excessive Massing:** The overall bulk of the development appears overly dominant within the surrounding built environment.
- **Insufficient Height Transition:** The minimal step-down in height fails to respond adequately to the site's topography and neighbouring scale.
- A **reduction of at least one storey** is strongly recommended across the site, with a **two-storey reduction** more appropriate in some areas.
- **Insensitive Elevation Treatment:** The proposed elevation lacks contextual sensitivity and coherence.
- **Disregard for Local Roofline Patterns:** Surrounding buildings feature **pitched and varied rooflines** that reflect historic grain and internal uses—this proposal does not.
- **Lack of Contextual Design Approach:** Rather than drawing from authentic local examples, the façade design feels **pastiche and superficial**.
- A **complete redesign of the façade** is recommended, focusing on:
 - Appropriate scale and proportion.
 - Stronger articulation.
 - Contextual and historical relevance.

4. Housing Mix & Social Inclusion

- Insufficient Evidence of Need: The applicant's Co-Living Demand report (Knight Frank) does not adequately demonstrate a local need for additional co-living accommodation.
- Opportunity for a Broader Housing Mix: While the applicant references London Plan policies (H10 (A) and H4 (B)) due to the absence of ECC guidance, the site offers a clear opportunity to deliver a more inclusive mix of housing.
- A development of this scale should incorporate conventional C3 housing alongside specialist co-living forms.
- Providing a mix of unit sizes and tenures in this development would support a balanced and sustainable neighbourhood.
- Concerns over Internal Layout & Social Integration: The current design shows large numbers of units accessed from a single internal corridor without intermediate communal spaces. This approach is contrary to good design principles that promote social interaction. In comparable student housing typologies, smaller clusters with shared social areas are encouraged to foster community and avoid institutional layouts.

5. Environmental & Sustainability Approach

- Overall Strategy – Lacks Ambition and Detail: The inclusion of passive ventilation and air source heat pumps (ASHPs) is welcomed. However, the overall environmental strategy is underdeveloped and lacks ambition for a project of this scale and prominence.
- A zero-carbon target should be pursued, with design flexibility to accommodate future technologies and potential changes of use.
- Adaptability and Future-Proofing: The Design & Access Statement (D&AS) does not adequately consider future adaptability. Paragraph 6.35 of the Exeter Plan requires applicants to show how buildings could be repurposed if co-living demand declines (e.g., for build-to-rent housing or office use). The applicant should be asked to submit plans addressing this requirement.

6. Public Realm & Historic Pedestrian Link

- There is no clear strategy for the deliveries and how the rubbish is managed within this large site.
- The current pedestrian Historic passage provides an important, always-open public route, enhancing connectivity between North Street and St Mary Arches. The proposal's partial closure or gating of this link will significantly reduce its public utility.
- The applicant's stated intent to work with the local community and businesses to deliver social value and public benefit, but how and what is proposed in defined and properly measured.

7. Servicing & Management

- Lack of a Comprehensive Servicing Strategy: The proposal does not provide a clear strategy for deliveries, maintenance, or refuse collection.
- The shared access from Mitre Lane lacks sufficient space for deliveries or service vehicles, while loading bays are positioned too far from key entrances.

- **Incomplete Management Plan:** The submitted Management Plan is missing Part 3, which should relate to the Travel Plan. Including Resident and visitor travel modes, Cycle and car share initiatives and Delivery and servicing management measures.
- **Poor Internal Circulation and User Experience:** With no dedicated circulation space between the two blocks, other than through the Kitchen, the current layout would result in a poor connectivity between the two blocks. Is it expected to move the rubbish between the two blocks through the kitchen?
- **Unsuitable Use of Bartholomew Street East Layby:** The proposal to use the Bartholomew Street East layby for deliveries and move-in/out activities is unworkable, as it is remote from all main entrances.
- **With the primary entrance located on North Street,** delivery drivers are likely to park directly on North Street, leading to Traffic disruption and Safety concerns for pedestrians.

8. Transport and Travel Plan.

- Whilst the proposal for a car free development is given, the idea that 300 residents will not need a car is flawed. Like many other recently approved co-living schemes, the applicant should provide a car share vehicle scheme within the development.
- The application proposes 29 larger rooms for people with disabilities but neither the travel plan nor the management plan make any mention of supporting their mobility or travel needs. The applicant should provide a reasonable number of on-site parking spaces for residents who have a disability.

In the Civic Society's North Street Redevelopment Vision document previously submitted we made the following recommendations:

Approving adequate S106 funding will secure essential public realm improvements that directly offset the development's impacts and deliver measurable safety, accessibility, environmental and social benefits that are fully supported by residents, local businesses and users of North Street. The council is therefore asked to negotiate and secure the full, proportionate S106 contributions set out below as a condition of planning consent to guarantee delivery and long-term stewardship of the streetscape.

Recommended S106 Heads of Terms

- **Monetary contribution** to fund a co-design engagement process to identify the most appropriate public realm improvements and the implementation of these improvements.
- **Delivery schedule** tying payments to development milestones and occupation triggers.
- **Specification and approval** requirement for detailed designs to be approved by the council prior to works.
- **Maintenance and adoption** provisions clarifying long-term responsibilities and commuted sums where transfer to the council is required.
- **Monitoring and reporting** obligations so the council can confirm completion to specification before release of funds.