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By email

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Ref.: Mary Arches Redevelopment, 25/0781/FUL

Dear Planning Committee, Dear Mr Smith,

Exeter Civic Society wants to add to our previous responses from 22 Aug 2025, 22 Oct 2025 and 23 Nov 2025 about the Mary Arches Redevelopment. Research as a result of new documents challenges the officer's report and proposals by the applicant.

Identified harm

We agree with Historic England, that the current proposal 'would intensify the existing discordance' in an important inner-city area. Increasing the height by an extra storey would further 'exacerbate the disparity between new and historic structures.' As the officer's report notes, when built, the new buildings will mark a missed opportunity to reinstate historic street patterns, especially along Mary Arches Street and North Street. Also, the lack of active street-level uses will diminish the vibrancy and safety of the streets, at a time when, especially in North Street, efforts are made to improve both.

We say, the officer's recommendation effectively normalises harm: because the existing car park is considered poor, the report's assessment accepts a replacement that causes 'harm', and places this harm without any further explanation 'at the upper end of less than substantial' (16.17), even acknowledging that this is 'a missed opportunity to repair the harm caused by post war development' (16.3). If this logic is established by planning officers, future new schemes will result in further erosion of heritage significance on the basis that the area is already degraded, creating a cycle of cumulative decline. Such a cumulative degradation is directly contrary to the NPPF requirement to enhance or better reveal significance, not to entrench decline.

We think, harm that is avoidable cannot be justified. If the scheme, as the officer report notes, is a missed opportunity to repair harm, then by definition a less harmful alternative exists. The NPPF requires the least harmful option to be pursued. The

applicant has not demonstrated that such a less harmful design option is unachievable.

Meeting local housing need

In the report's conclusion 'the benefits in terms of provision of residential development **to meet demonstrated housing need**' are considered to 'outweigh the heritage harm and all other harms'. However, Co-living fails to address Exeter's demonstrated housing need. The city's housing register shows that around 2,000–2,200 single-person households are waiting for genuinely affordable, self-contained one-bed homes, making single adults the largest group on the register. Census 2021 data reinforce this structural need: in Exeter, over 55's account for more than half of all single-person households, while those under 35 make up only around 13%.¹

The Knight Frank document is an investment assessment for developers not a demand assessment for housing and cannot be afforded weight in the determination of housing need.

Further, the Mary Arches location is exceptionally suitable for the over 55 cohort due to its close proximity to vital social, transport and retail opportunities.² But this cohort would not have adequate income to live in this development, and we find it is wholly unsuitable for this age group to live in bed-sit accommodation.

Therefore this Co-living development does nothing to meet the needs of these older single households, nor the thousands of applicants on Devon Home Choice, because co-living units do not qualify as affordable housing, do not meet the standards required for allocation, and cannot be offered through the housing register. As a result, this scheme diverts scarce land away from the forms of accommodation Exeter urgently requires, while offering no benefit to the households experiencing the greatest unmet need.

Also, the development applied for fails to meet the requirements of Policy H1 (Housing Mix) and does not contribute to the delivery of genuinely affordable 1-bed

¹ Data extracted from the 2021 ONS Census, single-person households for Exeter:

Aged 16 to 24 years	618	4%
Aged 25 to 34 years	1,974	12%
Aged 35 to 49 years	2,813	17%
Aged 50 to 64 years	4,220	25%
Aged 65 years and over	7,390	43%
TOTAL	17,015	

(<https://www.ons.gov.uk/datasets/RM057/editions/2021/versions/3>)

² About the exceptional suitability of the Mary Arches location for elderly people, situated:

- in the city centre with close proximity to a vibrant High Street with its shops and cafes, close to bus lines,
- in the vicinity of a central venue for the U3A and the Exeter Forum,
- just next to Exeter's largest Bingo Hall.

NOT using this site for the elderly cohort and adding them to the diverse and rich mix of residents in the area neglects a prime local potential for inner city development.

accommodation identified as a priority in the emerging Local Plan. As such, the proposal cannot be afforded weight as addressing Exeter's housing need and should not be considered a substitute for the delivery of conventional 1-bed affordable homes.

Where the current proposal has the marked difference between Blocks A and B, with B not offering any communal amenities, it would have been feasible to rethink the use of Block B to cater for the 1 bedroomed cohort specifics, which most likely would meet minimum floor areas for one bedroomed flats. A development bringing together elderly citizens (in Block B) with the younger Co-living cohort (in Block a) would provide an innovative social experience and thereby add to the diverse dwelling mix in the area much better than two single use Co-living blocks.

Room sizes, kitchen size and ratio

The approved Summerland Street/Verney Street scheme and the Heavitree Road development both provide a good ratio of kitchens and lounges serving rooms, ensuring residents are not reliant on cooking and eating in their bedrooms. These schemes demonstrate a clear local expectation supported by officer's recommendations: where private units are compact, communal kitchens and social spaces must be generous and functional.

Mary Arches reverses this logic. It provides small, self-contained rooms with severely overstretched communal kitchens, creating an insular and poor-quality living environment. **When benchmarked against recent approvals, the proposal represents a material downward departure from the standard of residential amenity the Council has recently secured for Co-living in Exeter.**

As much as the individual room size in the proposed Mary Arches development matches other recently secured Co-living accommodation (though at the lower end),³ Mary Arches, by contrast, proposes some of the weakest kitchen ratios in the city. The proposal provides an overall room-communal kitchen ratio of 27:1, with extreme peaks of 46:1 on Block A floors 2 and 3, 35:1 on floor 4, and 26–35:1 across Block B. The principal ground-floor amenity space serving occupants contains access to 1 large kitchen. These ratios are far below the standard achieved in comparable co-living and PBSA schemes in Exeter. The former Devon & Cornwall Police HQ (Heavitree Road) officer's report for the approved scheme places significant emphasis on communal kitchens and shared spaces providing kitchen–diner ratios in the range of 12:1 to 26:1. The Summerland Street/Verney Street scheme has ratios of 17:1 to 30:1, but the kitchen/dining spaces are generous.

This departure from previously accepted standards is even more difficult to defend given that the Council repeatedly cites the London co-living guidance, which assumes small clusters with readily accessible same-floor kitchens. **Ratios of 46:1**

³ Out of its 297 units the proposed Mary Arches development provides 237 standard units at 18 and 20 sqm internal area and 26 units at 21 and 26 sqm; as well as 34 large units of 27sqm or above.

or 35:1 are wholly incompatible with that model and represent a very low level of dining facilities.

This matters as Co-living is a relatively new residential use type, considered to be 'sui generis' use (outside the uses defined in the Use Classes Order). The officer's report states: 'The principle of this use has been established through consents on other sites (e.g. Summerland Street, Harlequins Centre, and former Police Station Heavitree Road) and in draft Exeter Plan Policy H6 Co-living.' (4, 16.1) **As it is sui generis the Council has to show consistency in how it treats developments.**

Provision for re-purposing should co-living not work

The *Design and Access Addendum 2* from November 2025 **contains only very rudimentary information about the adaptability for C3 units**; it says 'The rectilinear floor plate provides maximum flexibility. The co-living rooms are approximately 3 metres wide: this dimension would facilitate the combination of units for C3 purposes. Additionally, the positions of the elevation windows would also be suitable for C3 use.' (p.7) A revised floor plan shows the reconfiguration with 1 bed (predominantly 40sqm, with a few 50-62sqm), 2 beds (a few 62sqm) and 3 beds (a single 86sqm) units. The communal kitchen is consumed by a large 2 bed flat. Although this meets the minimum national standards, for 1 bed flats the layout proves more challenging: If co-living rooms either side of the corridor are just 3m deep there is little or no scope to introduce internal corridors in a 1 bed flat without reducing rooms to just 2m wide.

For the time of the application, there are no indicators how these C3 units would be internally structured. So this vital information is kept at an absolute minimum. Both Heavitree Road and especially Clarendon House redevelopments provide more details about the internal structure after a re-design; with furniture layout for different change scenarios in the case of Clarendon House. Something similar would be advisable to have as a condition for Mary Arches. Condition 9 seems to request more details prior to the commencement of construction. We wonder why this has been negotiated earlier.

Staffing

Staffing provision in the submission is set at 9am to 5pm Monday to Friday which **is at odds with the required 24/7 staffing for both the PBSA and co-living blocks at Heavitree Road** where the report reasoned that adequate supervision, robust cleaning and management arrangements of the kitchen and social spaces was cited as essential to shared kitchen provision. The Mary Arches scheme does not achieve this.

Car share

The Heavitree Road development was required to facilitate a car share scheme. For Mary Arches there is a substantial S106 contribution for car share but a place for a car has not been provided. Does that mean **the contribution will be spent elsewhere?**

North Street improvements

The approved Heavitree Road scheme included significant public realm improvements to enable its use by the increased number of residents. This “made policy” should be applied to North Street as the main entry exit point of the scheme and must be the focus of highway and footpath improvements by the developer directly or by developer S106 contribution.

The Section 106 Recommendations listed in chapter 18 do not seem to respond to the *North Street Improvement: ‘Vision’ Document* we drew up with local support from business and residents and submitted on 22 Oct 2025.⁴ Specific public realm improvements we suggested would help North Street, a major north-south thoroughfare in Exeter since Roman times,

- to recapture and reimagine its lost identity;
- to reach and secure its full potential as business destination;
- to increase and diversify its street use and scene;
- to become an inner-city street where people want to live;
- to improve safety by modernising lighting in the street and its alleyways.

Given that both organisations have applied for national funding to kickstart North Street improvements, we **request a review of the S106 Recommendations with the North Street Improvement Project in sight.**

Yours faithfully

Gert Vonhoff Keith Lewis Chris Pope

ECS Strategic Planning & Highways Group

⁴ <https://exetercivicsociety.org.uk/wp-content/uploads/2025/11/North-Street-Improvements-ECS-Workshop-2-Results-V4.pdf>.