

Statement to ECC Planning committee 9 February 2026. Application for Clarendon House PBSA. Planning Application 25/1082/FUL

Good evening

The civic society has submitted two letters of objection to this planning application, one just last week after we investigated the application's compliance with the National Planning Policy Framework guidance, Historic England's planning guidance, and views of the proposals, both distant and nearby.

Our conclusion is that the applicant and your planning officers have ignored paragraphs 200 and 202 of the NPPF which requires harm to heritage buildings to be avoided wherever possible and requires applicants to demonstrate that harm has been minimised. But the applicant's design process is based on maximising heights and rooms rather than considering the impact upon our city's heritage.

In assessing this application the test should be whether benefits outweigh unavoidable harm — that is, harm that cannot be reduced or eliminated through reasonable design changes.

Your Urban Design Officer has stated that preserving key Cathedral views would require a maximum height of six storeys – we agree. Harm arising from this proposal is not clearly and convincingly justified as required by the NPPF because a less harmful option clearly exists.

Accepting avoidable harm signals a willingness to permit incremental erosion of Exeter's heritage and townscape, contrary to both local policy and the NPPF. And whilst the officer's report defends the height and massing of the proposals, there is still an issue with the over-bearing nature of the building's impact upon the city and our most revered heritage asset, the Cathedral.

The applicant and the planning officers have failed to take account of the cumulative loss of views of the Cathedral as a result of recent developments such as the Depot and other tall buildings nearby, or the expected impact of development at the former police station site.

Historic England's September response said that the Cathedral holds landmark status with views of it largely unchallenged within the cityscape. And this planning

committee has asked for many applications in the past to be reduced in height to preserve views of the Cathedral. Should you be asking this question again?

The applicant's CGI material demonstrates the intrusive scale of the development when experienced from Newtown, St Leonards, Eaton House, and the historic Eaton Place terrace. The proposal will overshadow surrounding residential neighbourhoods, particularly the grade 2 listed Eaton Place terrace, and introduce a scale entirely at odds with the established character of the area. This proposal should be stepping down towards the terraces of Newton not stepping up.

We are of course reliant on the applicant providing accurate CGI images of the proposals. Yesterday I wrote to councillor Knott and the planning officer pointing out that the views from Exwick and the south east of the city show the development in the wrong place. One showing the proposal west of the John Lewis block, and the other in the vicinity of Hotel du Vin. If they have made errors with these views can you be sure that other views and heights are accurately depicted?

We are concerned that studio rooms have no access to communal cooking facilities. These residents will therefore be expected to cook and eat in their rooms and not have the benefit of social interaction. This contradicts the reasoning used in the recent Heavitree Road approval which made it clear that the small bedrooms were only acceptable because of communal facilities. The same standards should be applied across comparable PBSA applications if this committee is to be consistent in maintaining appropriate standards of amenity for students.

The report says that any harm is outweighed by public benefit, but what public benefit is there?

The proposal will not provide any urgently needed homes to address the housing shortage for those recognised in your Housing Needs Assessment. The only public benefit is the green lane from the car park, but there is already a perfectly good public route to Western Way. And is there any public benefit for the council using PBSA and co-living developments to address the lack of a 5 year land supply under the government formula?

Any assertion that PBSA will free up HMOs for family housing is not proven – the council continues to receive regular planning applications for more HMOs which are invariably approved.

Last month this committee deferred making a decision for the proposal for Co-living accommodation at Mary Arches street because of poor design, and previously rejected a poor proposal for the police and magistrate's court site. We urge you to also refuse this application because the scale and massing of the development will create harm to our city.

Perhaps the undetermined 2025 planning application for the conversion of the existing building into 1, 2, and 3 bedroomed homes would be a better option than to approve this overbearing scheme.

Thank you.

Our second letter Feb 2026

Heritage Harm and the Absence of a Required Cumulative Assessment It is stated that the identified heritage impacts are less than substantial. However, national guidance makes clear that heritage harm cannot be assessed in isolation. While the NPPF (paras 199–202) requires the identification and weighing of harm, Historic England’s statutory guidance (GPA2 and GPA3) requires decision-makers to assess the cumulative and incremental impact of development on the setting of heritage assets. This includes the combined effect of multiple tall buildings in the area on key views and the overall character of the city. The council’s Urban Design & Landscape officer asserts that the height of the buildings will obstruct views of the Cathedral in particular, but he, and the applicant, have not taken into account the additional loss of views as a result of the Depot and other tall buildings nearby, or the expected impact of development at the former police station site. A cumulative assessment of harm does not appear to have been undertaken. As a result, the conclusion that the harm is outweighed by benefits is incomplete and cannot be relied upon.

2. Height, Townscape Impact, and the Existence of a Less Harmful Alternative The justification for a 10 story building relies on selective references to “surrounding topography” and nearby taller buildings, while at the same time describing the harm to: • The Cathedral. • 2-storey homes in the lower-lying Newtown area. • The 3-storey Grade II listed terrace directly adjacent. • The residents of Eaton House. • The sensitive transition between historic townscape and the city centre gateway. The Urban Design Officer has stated that preserving key Cathedral views would require a maximum height of six storeys. A less harmful option therefore clearly exists. National policy requires harm to be avoided wherever possible. NPPF paragraphs 200 and 202, read alongside Historic England guidance (GPA2 and GPA3), require applicants to demonstrate that harm has been minimised and that less harmful alternatives have been fully explored. As a less harmful option exists but has not been pursued, the harm arising from this proposal is not clearly and convincingly justified, as required by the NPPF. The Urban Designer agrees that this development will enhance the Eaton Place terrace by removing the advertising hoarding, but it is the 6 to 10 stories that is the problem. A reduced height would be better in Heavitree Road rather than being concerned about the advertising hoarding.

3. Overbearing Massing and Visual Dominance The applicant’s CGI material demonstrates the intrusive scale of the development when experienced from Newtown, St Leonards, Eaton House, and the historic terrace. The proposal would overshadow surrounding neighbourhoods and introduce a scale entirely at odds with the established character. This scheme will act as a precedent for further height escalation, accelerating the incremental transformation of Exeter into a high-rise city. Once this trajectory is established, the cumulative harm to Exeter’s historic character and townscape will be irreversible.

4. Conflict with NPPF: Avoiding Entrenched Decline The NPPF requires development to avoid entrenching decline in townscape quality and to demonstrate that the least harmful option has been selected. The application does not demonstrate that the least harmful option has been adopted. Instead, it accepts avoidable harm on the basis that it meets a threshold. This is not therefore in the spirit of what the NPPF intends.

5. Non-Compliance with Emerging Exeter Plan Policy H6 (PBSA) Emerging Policy H6 requires PBSA to provide: • High-quality, well-designed accommodation. • Adequate internal space and functional layouts. • Sufficient communal kitchens and dining areas. • Communal space proportionate to the scale of development. • A positive contribution to mixed and balanced communities. • Robust evidence of need. Page 3 The 13sqm

cluster rooms are described as between 4 and 7 per kitchen/dining facilities, this accounts for the entire kitchen/dining provision leaving the studios with no access to communal cooking facilities. Studio residents would therefore be expected to cook and eat in their rooms. This contradicts the reasoning used in the recent Heavitree Road approval which made it clear that the room size was only acceptable because of the communal facilities. The same standards should be applied across comparable PBSA applications. The applicant claims 25 Kitchen–Living–Dining rooms (KLDs), implying roughly 1 kitchen per 12 residents. However the applicant has not provided a Management Plan showing how kitchen provision is to be managed between the cluster and non-cluster rooms therefore we are left to assume: • 163 cluster rooms require approximately 29 kitchens (based on 4–7 rooms per kitchen) • This leaves no kitchen provision for the 134 studios

7. Conclusion In assessing this application the test should be whether benefits outweigh unavoidable harm — that is, harm that cannot be reduced or eliminated through reasonable design changes. Where harm can be avoided — for example, by reducing height to 6 storeys max., as suggested by the Urban Design & Landscape Officer — it should not be accepted simply because it falls below a threshold. Accepting avoidable harm signals a willingness to permit incremental erosion of Exeter’s heritage and townscape, contrary to both local policy and the NPPF. •

We hope this application will be refused so the scale and massing of the development can be fully considered against the harm it will cause to buildings of local historic value and to residents of Eaton House, the 3-storey Grade II listed Eaton Place terrace directly adjacent and Newtown.