

Mr Douglass
City Development
Exeter City Council

CC: Mark Devin, Democratic Services Officer

By email
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4th February 2026

Dear Planning Committee, Dear Mr Douglass

Clarendon House Planning Application 25/1082/FUL – Representation

Reviewing the recent additional documents and having undertaken some further research and analysis in respect of this application, particularly relating to National and Local policy, Exeter Civic Society would like to provide these additional comments.

1. 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.

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**

6. Transport and Car Access

The Heavitree Road approval recognised that students may occasionally require access to a car and required provision for car-share schemes. No such provision is made here, despite similar circumstances. All parties would benefit from a consistent approach across similar applications.

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.

Yours faithfully

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