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By email

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Application reference: 25/0781/FUL

Proposal: 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).

Dear Mr Smith,

Thank you for inviting us to comment on the revised plans for the Mary Arches Redevelopment. Our response below is thought to be in addition to our previous responses, especially where they refer to the use of this site for Co-living rather than residential 1-, to 4-bedroom inner-city flats and to the harm the development will cause. Even with the alterations now presented the proposed scheme still increases building height and mass, which would harm the Conservation Area and setting of Listed Buildings; and the view of St Michael's Mount Dinham from Fore Street will be largely lost. We see the deferred scheme still as what the officer's report called 'a missed opportunity to repair the harm caused by post war development' and that is contrary to the NPPF requirement to enhance or better reveal significance, not to entrench decline.

Exeter Civic Society also still has concerns about the architectural design which follows the deferral at the January Planning Committee meeting, which we will explain in detail below. Given that the reduction of Block B by one storey leads to a severe reduction of amenity space while keeping the number of co-living units almost the same, **we object to the revised proposal on grounds of**

- **harm to the Conservation Area,**
- **resident wellbeing,**
- **social sustainability,**
- **loss of amenity space,**
- **significant disconnect between the current design and the required standards for community integration for Large-Scale Purpose-Built Shared Living (London Plan Standards) and**
- **failure to meet Emerging Policy H6 of the 'Exeter Plan'.**

As the revised plans are not limited to the defer-brief of the Planning Committee, but include substantial changes of a much wider nature, we feel we have the obligation to raise these new aspects which are a direct result of the revised plans.

Regarding the revised proposals, we maintain a clear and unequivocal position that the scheme remains fundamentally unsuitable for this site. The development continues to be characterised by an inappropriate architectural approach, excessive and poorly resolved massing, and a failure to respond adequately to its context. As a result, it would cause demonstrable harm to both the local townscape and the wider Exeter skyline.

Beyond these critical urban design failures, the proposed accommodation is not considered fit for purpose as permanent residential development. The significant reduction in ground-floor amenity and communal provision represents a clear deficiency and fails to meet accepted standards for residential quality and neighbourhood integration, including those set out in the London Plan.

1. Architectural Design¹

The architectural strategy is fundamentally flawed. The scheme presents as a disjointed and incoherent composition of unarticulated façades, lacking any meaningful design rigour. The superficial use of yellow and red brick does not constitute a contextual response; instead, it highlights the absence of any genuine engagement with the local vernacular in terms of scale, rhythm, proportion, or massing.

For a site of this prominence and historic sensitivity, directly opposite the Iron Bridge and identified as a key gateway into the city, the design falls significantly below the standard required. It fails to demonstrate the civic presence, contextual awareness, or architectural quality expected in such a location.

The revised proposal does not preserve or enhance the character or appearance of the Conservation Area. On the contrary, its excessive and poorly articulated massing would erode the area's established character, disrupt important views, and appear overbearing in relation to neighbouring development.

The current plans do not offer any potential connection for use of the facilities/amenity spaces to the public, neighbour or guests, thereby severely limiting any potential integration and making the redevelopment an island within its neighbourhood. See our Diagram 03 for more details (in the attachment).

Block A

The revisions to Block A are minimal and do not address the fundamental issues. The massing remains excessive, and the minor alterations to the elevation designs are insufficient to mitigate its harmful impact.

¹ For clarity, these comments are based on Design Addendum 03 (003), HTVIA Addendum 2503RE02.1, and the most recent issue of architectural information.

Attempts to apply superficial architectural treatment are ineffective and do not resolve the underlying design deficiencies. A comprehensive reconsideration of the block's form, scale, and layout is required.

The scheme fails to draw on the richness of detailing, hierarchy, and material expression that characterises the surrounding built environment. This represents a missed opportunity and reinforces the scheme's lack of contextual sensitivity. See our Diagram 02 (in the attachment).

While limited changes have been made to the North Street and Bartholomew Street East frontages, the courtyard elevations remain unresolved, poorly considered, and architecturally weak.

Critically, the proposal fails to respond to the established vertical rhythm, hierarchy, and grain of North Street. This results in a discordant and incongruous intervention within an otherwise coherent streetscape. See our Diagram 01 (in the attachment).

Given the demonstrated capability of Darling Associates to deliver high-quality residential architecture, including the Fermoy Road scheme in Westminster, the current proposal is particularly disappointing and falls well below an acceptable design standard.

Block B

The reduction in height from five to four storeys is welcomed for Block B, as it reduces visual impact and introduces a more human scale that better relates to the surrounding context.

However, the elevational treatment remains underdeveloped. There are early indications of articulation which, with further design development, could evolve into a more coherent and contextually appropriate architectural language. In this regard, reference to 'The Neighbourhood' buildings opposite Block B could provide a useful precedent.

While changes have been made to the Mary Arches Street frontage, the courtyard elevations do not carry these changes through and remain architecturally considerably weaker.

2. Resident Wellbeing and Social Sustainability

The Council has repeatedly relied on the 'Greater London Authority's Large-Scale Purpose-Built Shared Living Guidance' (February 2024) as the most appropriate benchmark for assessing co-living schemes. This benchmark was explicitly referenced in:

The Heavitree Road (Devon & Cornwall Constabulary) consent

The previous Mary Arches Street committee report (before deferral)

The London Plan Guidance requires (among other things):

- 4 sqm internal amenity space per resident for the first 100 residents
- 3 sqm internal amenity space per resident for residents 101–400
- 1 sqm per resident of external amenity space

- 0.5 sqm per resident of kitchen space
- One cooking station per 15 residents
- Communal toilets accessible from shared spaces

As agreed at Planning Committee, the approved Heavitree Road scheme exceeded these standards:

- Small studios are acceptable only when supported by high-quality communal facilities
- Communal kitchens served 12–26 residents
- Internal amenity provision was 3.36 sqm per resident

By contrast, the revised Mary Arches Street scheme provides:

- 1.96 sqm internal amenity space per resident (down from 3 sqm previously)
- Reduced kitchen sizes on Levels 2–4 of Block B from 45sqm to 25sqm each
- No communal toilets or hand-washing facilities anywhere in the building
- No WC facilities for staff
- No lower-ground kitchen in Block A
- Loss of the laundry and media room
- Loss of the Level 5 roof terrace (307 sqm)
- Kitchens serving up to 46 residents each
- Removal of 77sqm of co-working space

Criterion	Heavitree Road (Approved)	Mary Arches Street – Original	Mary Arches Street – Revised	Source
Internal amenity per resident	3.36 sqm	3 sqm	1.96 sqm	committees.exeter.gov.uk
External amenity	Multiple terraces	Roof terraces	Loss of 307 sqm terrace	committees.exeter.gov.uk
Kitchen size	~40 sqm	45–55 sqm	25–45 sqm	committees.exeter.gov.uk
Residents per kitchen	12–26	25–35	40–50+	committees.exeter.gov.uk
Shared WCs	Provided	Provided	None	committees.exeter.gov.uk
Laundry	Provided	Provided	Removed	committees.exeter.gov.uk
Compliance with London Plan	Exceeds	Meets	FAILS	london.gov.uk

This represents a material departure from the benchmark the Council itself has used to justify co-living elsewhere. If the London Plan Guidance was an appropriate benchmark before, it is unclear why provision below that benchmark should be considered acceptable.

Wellbeing Implications

Reduced amenity space and oversized kitchen groups increase the risk of:

- Social isolation, as residents retreat to small studios due to overcrowded shared spaces
- Over-immersion, where residents feel pressured into constant social contact without adequate quiet space
- Mental health strain, particularly for young adults living alone
- Poor quality of life, as communal areas become congested and less usable

These risks are well-documented in research on micro-living and high-density shared accommodation.

3. Hygiene, Food Safety and Disease Transmission

The London Plan Guidance requires communal toilets near shared spaces. The Mary Arches Street scheme provides none.

This omission has several consequences:

- Residents must return to their studios to wash hands or use the toilet
- Visitors have no access to toilet facilities without entering private rooms
- Food preparation is compromised by the absence of dedicated hand-washing points
- Disease transmission risk increases in high-density environments

Environmental Health Officers typically treat large co-living kitchens as quasi-commercial and expect:

- A dedicated hand-wash basin
- A separate food-prep sink
- A separate washing-up sink or dishwasher

(Source: Food Standards Agency, *Food Safety and Kitchen Hygiene*, HS 10.2)

The Mary Arches Street kitchens do not meet these expectations, and the absence of shared WCs is poor practice in any building where 300+ residents (some rooms may be used as doubles) share facilities.

4. Loss of Amenity Space Driven by Design Changes

The applicant removed a floor from Block B to address design concerns raised at Planning Committee. However, instead of proportionately reducing resident numbers, the applicant:

- Preserved almost all studios (297 → 292)
- Removed substantial amenity space
- Reduced kitchen sizes
- Eliminated the Level 5 roof terrace
- Removed the lower-ground WC, laundry and kitchen

This means the burden of the design change has been placed on residents' wellbeing.

Block B now has no direct access to amenity space and is reliant for access on passing through Block A dining space, while operating as one unit this may be

acceptable but if redeveloped to independent residential accommodation residents of Block B would be denied external space.

5. Failure to Meet Emerging Policy H6

Emerging Policy H6 requires sufficient provision of:

- Kitchens
- Dining/social space
- Collaborative workspace
- Outdoor amenity
- Laundry/drying facilities
- Storage and refuse facilities

The revised scheme reduces or removes several of these elements, directly conflicting with the policy direction the Council has already signalled.

The Committee will recall the view of the Planning Inspector in Appeal Ref: APP/Y1110/W/23/3328094 for the Former Police Station and Magistrates Court, in Heavitree Road where in regard to amenity the inspector cited paragraph 135f) of the Revised National Planning Policy Framework which, amongst other things, seeks to ensure developments provide a high standard of amenity for existing and future residents. This scheme now falls below the London Plan standards referenced in previous reports to committee for this development.

6. Concerns about the Plant Area

The plant area provided does not appear adequate for the MVHR and heat pump systems mentioned in the Net Zero Carbon Statement. Usually, heat pumps require south-facing, exposed areas for maximum efficiency - the majority of the allocated plant is currently located in the ground floor corner of the building, with little space further up the building for plant. Concern is that once the M&E design is developed further, there will be a requirement to add roof plant, which would further heighten the massing of the building.

We suggest that due to the extensive amendments to the plans that bring the whole development far below London Plan standards the revised application should be rejected unless

- **architectural improvements are designed in,**
- **better community integration is sought,**
- **the raised concerns about the Plant Area are addressed, and**
- **amendments are made to return it to comply with or exceed the London Plan. We therefore suggest the reinstatement of:**

- **Block B roof terrace, potentially set-back to minimise the height impact**
- **A minimum 3sqm per resident internal amenity space, currently 1.96sqm**
- **Laundry facilities**
- **Lower ground floor WC**
- **Provision of supporting statement and detailed layout plans for communal kitchen amenities providing adequate food safety facilities including:**
 - **A dedicated hand wash basin**
 - **A separate food prep sink**
 - **A separate washing up sink or dishwasher**
 - **Insect and pest control to balcony doors**

We request that the councils Environmental Health Officer report to the Planning Committee on the future wellbeing of residents in regard to both their physical and mental health.

Yours sincerely

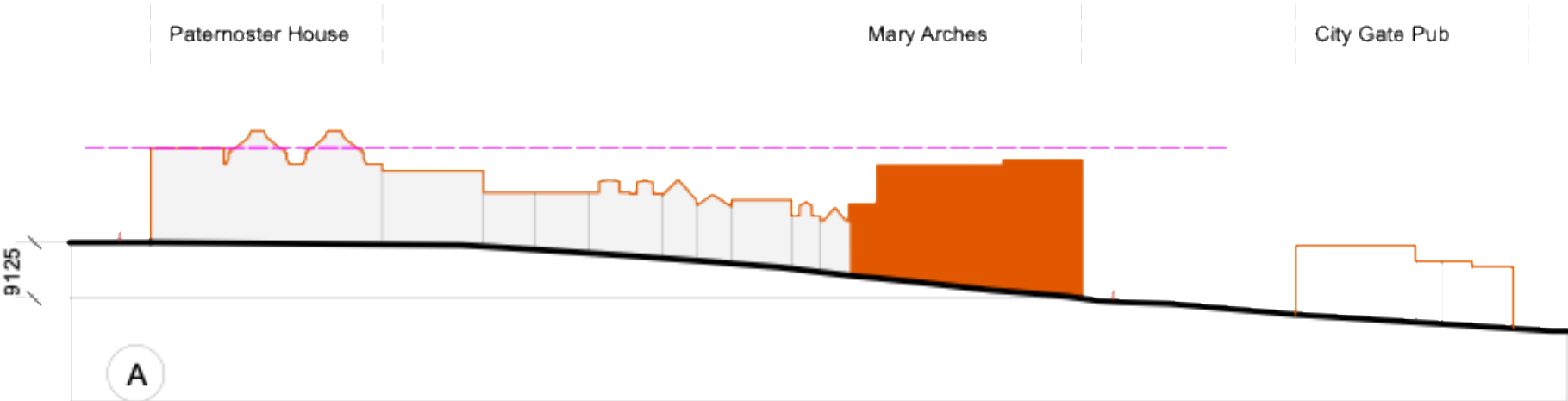
Gert Vonhoff Pierluigi Chinellato Chris Pope

On behalf of the 'Strategic Planning & Highways Group' of Exeter Civic Society

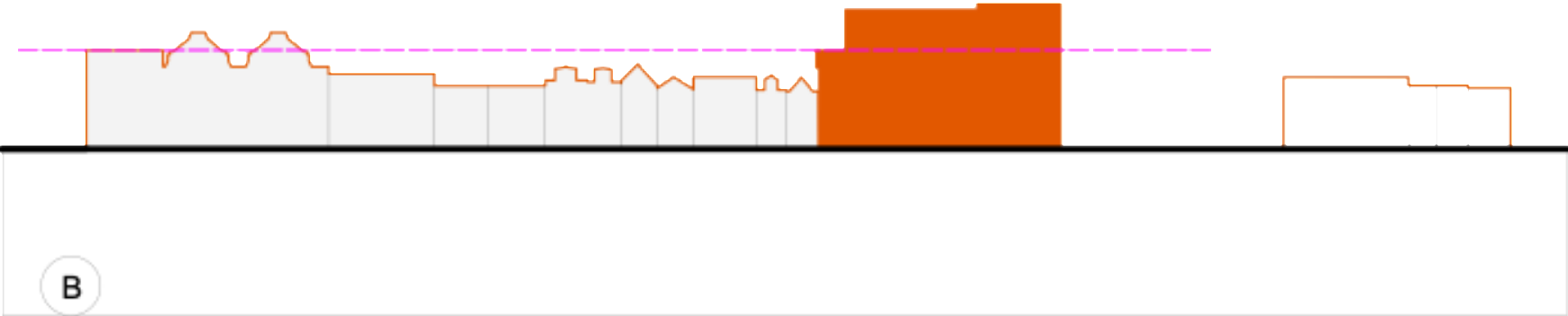
Below we include three diagrams and a photo with supporting texts as attachment to substantiate our critical points about the architectural choices further.

Diagram 01

NORTH STREET MASSING
comparison



Massing outline diagram



True Scale Comparison with flat-lined ground

Diagram 01

The purpose of this diagram is to show the real perceived massing of the proposal set against the eaves line along North Street.

While the natural slope of North Street might partially mask the building's height from certain angles, the "flat line" analysis demonstrates that the proposal relevant to the street level it represents a substantial increase in massing compared to the historic eaves line.

A. Real Perceived Massing

The first diagram (**Massing outline diagram**) shows the proposal in its actual topographical context.

- **The Eaves Line of Paternoster House:** A dashed magenta line tracks the consistent height of the existing street frontage of Paternoster house
- **Topographical Slope:** The ground line slopes downward from Paternoster House toward the City Gate Pub.
- **Proposal Impact:** The proposed building (highlighted in solid orange) sits significantly higher than the immediately adjacent structures

B. True Scale Comparison with flat-lined ground

The second diagram is designed to strip away the "distraction" of the sloping terrain to reveal the absolute volume of the building.

- **Flat Line Adjustment:** By levelling the ground line, the diagram isolates the height of the proposed structure relative to its neighbours.
- **Height Differential:** In this view, the "true scale" becomes more apparent; the proposal appears as a much denser, taller block compared to the finer grain of the existing North Street buildings.

Diagram 02

NORTH STREET BOOKEND comparison

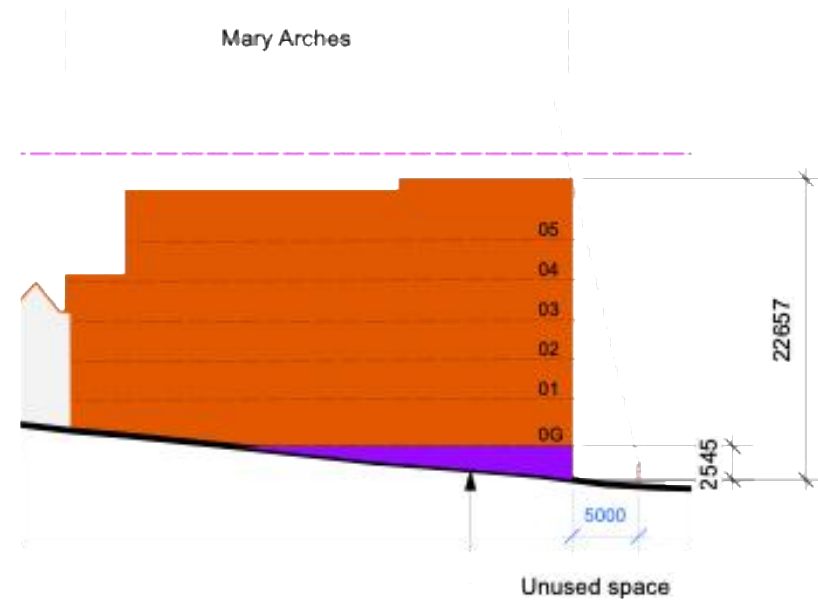
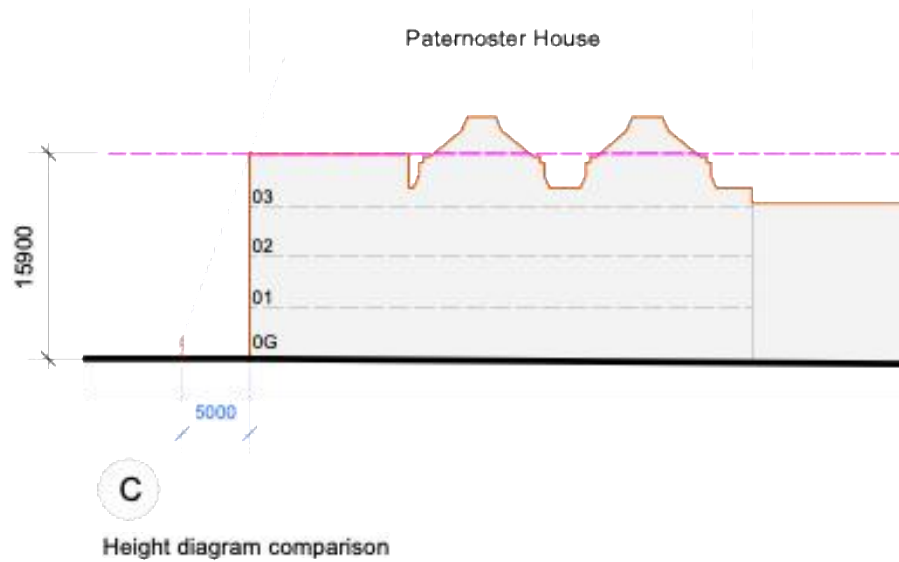


Diagram 02

The purpose of this diagram is to compare the massing and appearance of the proposal for Mary Arches

C. Height Diagram

- The height comparison highlights a significant disparity in both physical height and how that height is managed visually
- The Paternoster building is 15.4m high at the eaves, with a 4th floor set back from the main elevation with only the historical turret visible from the street.
- The Mary Arches proposal is 22.6m high with no setback.
- Ground Level and "Unused Space": The 6-storey proposal appears even taller because it sits atop an "unused space"(highlighted in purple) created by the sloping ground.
- A 1.7m tall person (set 5m from the building) has been drawn to show how the building massing and height are perceived

D. Elevation and Aesthetic Comparison

- Paternoster House features highly detailed and refined elevations, characterised by a sophisticated rhythm of **solid to void** and an articulated roof eaves line
- In contrast, the Mary Arches proposal appears **monotonous and bland**, lacking detail and articulation

Diagram 03

Integrating LSBPSL into the neighbourhood Guiding principles of the London Plan

AS PROPOSED

No connection or positive contribution to the local neighbourhood

POTENTIAL IMPROVEMENTS to include:

- Mixed use spaces open the local community
- Active public amenities
- Shared working area

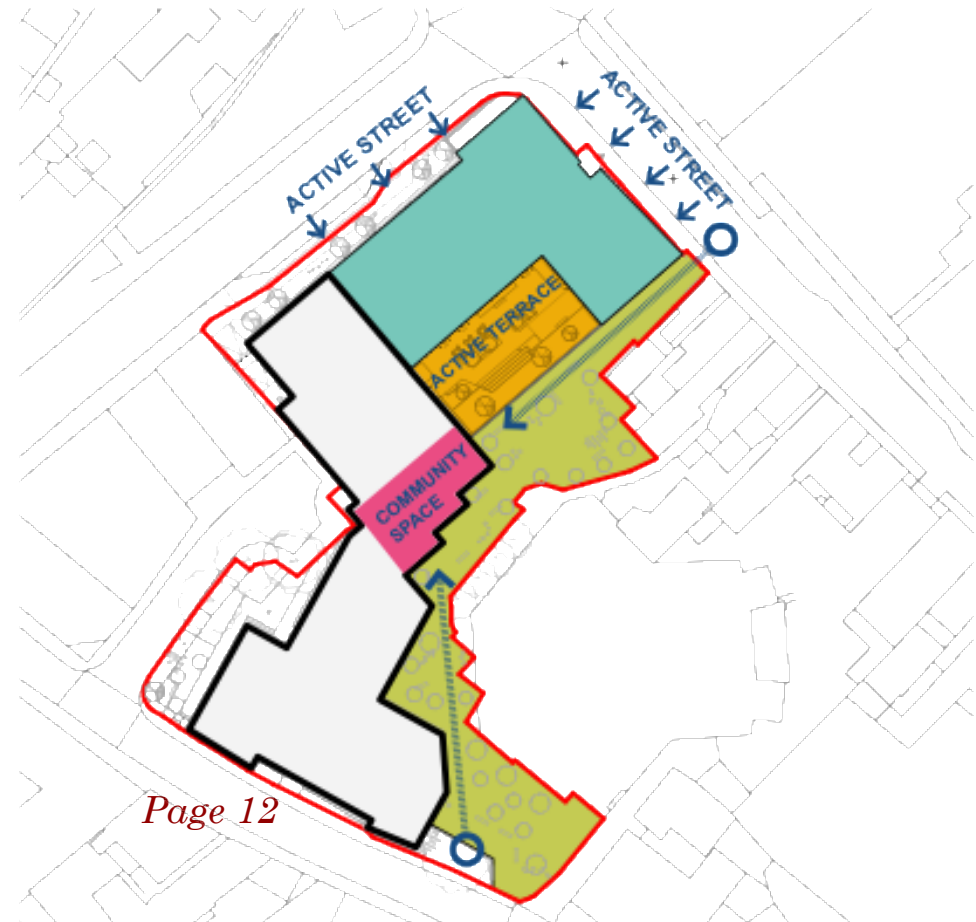


Diagram 03

The third diagram and accompanying text evaluate how the **Mary Arches** proposal aligns with the **London Plan's** guiding principles for Large-Scale Purpose-Built Shared Living (**LSPBSL**). The analysis highlights a significant disconnect between the current design and the required standards for community integration.

We have noted that the latest design changes have drastically reduced the amenity communal areas at ground floor. The London Plan set clear parameters for integrating LSPBSL into the neighbourhood and its surroundings as part of encouraging good quality and lasting design. The proposal, its design and articulation of the amenities fail to include this into the proposal.

Extract from the Section 3. Design quality of the London Plan

LSPBSL should:

- a. ensure active uses and public amenities are designed and located to activate the street; and public amenities on the ground floor should front the street or public realm
- b. avoid inclusion of any blank walls, dense vegetative screening or other design elements that visually segregate the development from the local surroundings or vice versa should be avoided, unless mitigation against external factors such as noise or air quality is required
- c. be encouraged to include public amenities such as restaurants, bars and communal workspace; promote use of these by the surrounding local community; and make them available to residents at no extra cost
- d. ensure any employment-space uses complement and strengthen the local economy.

The current plans do not offer any potential connection for use of the facilities/amenity spaces to the public, neighbour or guests, thereby severely limiting any potential integration and making the redevelopment an island within its neighbourhood.

Potential Improvements for Integration

Diagram 03 includes a "Potential Improvements" model to encourage a more permeable and active ground plane:

- Mixed-Use Spaces: Opening areas specifically for use by the local community rather than just residents.
- Active Public Amenities: Designing the ground floor to front the street with high-energy uses.
- Shared Working Areas: Implementing communal workspaces that are accessible to external guests to promote integration.
- Spatial Strategy: Active Terrace and a dedicated Community Space to bridge the gap between the private development and the public realm.

Photo of a setback in glass (Inner City Hamburg)



The use of glass frontage for the setback demonstrates how this can mask the height of a building while at the same time opening up interesting optical viewpoints in the mirror effects during different times of the day.