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Dear Mr Cummings

**Former Unit 1 Nightclub, Summerland Street & 2 Verney Street (Best Tyres),
Exeter EX1 2AZ 25/1817/FUL**

Representation by Exeter Civic Society

Justification for PBSA vs Social Housing

The site is well located for Purpose-Built Student Accommodation (PBSA), but the justification for further PBSA is weak when set against the acute need for one-bed social rented housing. Exeter City Council's waiting list ([Devon Home Choice Quarterly Monitoring Report January 2026](#)) includes approximately 2,000 households requiring affordable accommodation of which 1,200 require 1 bedroom, demonstrating a clear unmet need for conventional housing.

The applicant's demand assessment relies on pre-Covid growth trajectories and assumes continued rapid expansion of the University of Exeter. However, university students requiring accommodation have declined for four consecutive years:

Academic Year	21/22	22/23	23/24	24/25
Student Numbers	25,084	24,413	23,948	23,276

Source: *Planning Committee Report 25/1082/FUL (09/02/2026)*

Current PBSA that is available to occupy is just over 12,234 which is equivalent to 94% of the 13,009 additional students since 2006/07. The council had a target to accommodate 75% of those 13,009 additional students in PBSA meaning 9,757 extra bedspaces were required. If all consented bedspaces were built and student numbers remained the same the target of 9,757 beds will be exceeded and stand at 117% of additional demand representing 11,415 new bedspaces. While neither national policy nor the adopted Development Plan requires a demonstrable "need" for PBSA, the absence of need raises a material risk: sites may remain undeveloped while pressing needs for affordable housing remain unmet.

NPPF paragraph 11(b) requires planning decisions to meet objectively assessed needs unless adverse impacts would significantly outweigh the benefits. In this case, the opportunity cost of allocating a sustainable brownfield site to a potentially oversupplied use is significant.

It is therefore essential that, if approved, the development demonstrates genuine future-proofing and adaptability for alternative residential or mixed uses.

The cumulative concentration of PBSA and co-living schemes in this area also risks creating a mono-tenure, transient neighbourhood. The incremental clustering of under-35 accommodation types erodes residential diversity and affects the amenity of permanent residents.

Management and Staffing

The application refers to an on-site concierge and an on-site management team, but no Management Plan has been submitted. Other PBSA schemes in Exeter have been required to provide 24/7 on-site staffing to ensure safety, amenity and effective management.

Given the proposed studio-only model and limited communal facilities, robust management is essential. The Management Plan should be submitted and assessed before the application is scheduled for committee.

Setting

Summerland Street is being reshaped with low level low quality former industrial buildings being replaced with new blocks which are inevitably taller to make best use of the land for residential accommodation – PBSA and co-living. The tallness of the buildings risks making the street canyon like, especially where six storey blocks sit opposite each other. The blocks which are either built (The Depot) or being built (between Red Lion Lane and Verney Street), have the advantage of lower lying buildings alongside them to prevent the canyon effect, but this block will now result in completing the canyon effect without the benefit of any low-lying buildings to off-set this.

Due to the width of the streets, this block will not meet the council's Residential Design SPD para 7.16 policy where distances between habitable windows are required to be set 22m apart, all rooms facing to Verney Street and Summerland Street fail this test. With this block and the co-living block across Verney Street being built out to the edge of the pavement there will be about 12.6m between opposing windows, and on Summerland Street the distance is about 18.4m.

Whilst a view may be taken that for PBSA or Co-living use this is acceptable due to their overall shorter occupancy, should the building need to be adapted for long term residential use privacy concerns may be greater.

Courtyard facing habitable rooms will need to be checked to ascertain if the courtyard is wide enough to avoid oppressive enclosure bearing in mind the potential for future use as family homes and not the intended use as PBSA.

We recommend the council seek design changes to mitigate window distances, the canyon effect and oppressive enclosure in the courtyard.

Appearance

The Depot with development site left and proposed co-living right



The massing is monolithic, with minimal articulation. It sits opposite The Depot

The opposite corner of Verney Street hosts the consented Summerland Street co-living scheme, (see images) both of which employ lighter materials, varied rooflines and articulated façades. The proposal also fails to respond to the pastel-coloured frontage further along Verney Street.

Summerland St/Red Lion Lane Co-living design



Although the Design and Access Statement cite local precedents such as The Kingfisher, The Printworks and the Summerland Street scheme (23/0490/FUL), it draws no meaningful cues from them. Instead, it appears to upscale the former two-storey nightclub into a six-storey block, producing a poor contextual fit. The extensive use of dark brick at this scale has previously been judged unacceptable in Exeter in the recently approved application for PBSA at Clarendon House.

The roofscape lacks interest and fails to respond to neighbouring buildings. At the junction with The Printworks, the height increases rather than stepping down. Due to the incline of the road and the enlarged top-floor volume, the building reads as two full storeys taller than The Printworks, creating an overbearing presence. **This upper volume should be reduced, with the potential for an external roof garden instead.**

Despite identifying 23/0490/FUL as a “Key Development”, the applicant does not incorporate its key features—planted roof terraces, articulated roofline, lighter palette, or massing setbacks. The proposal instead presents a single, monolithic block in dark brick, contrary to NPPF paragraph 135, which require context-responsive, visually attractive design and effective landscaping.

The submitted visualisations are inconsistent, depicting both a dark, sombre building and a lighter-toned version. The proposed palette and final appearance remain unclear.



Unit 1 to The Printworks roof levels



Design and Access Statement 2.13 show other examples locally where a varied roofline has been used. Sadly, the elevations proposed will appear from a distance as very boxlike with a flat roof line from whichever angle it's seen. **We recommend that the applicant is asked to adjust the outline of the roofline to break up the skyline as well as adding a design that has the appearance of a roof.**

On a plus point the design carefully creates a varied elevation using material treatment which will be appreciated from the other side of the road - but from

a distance (and the visual impact statement shows that it will be noticeable from other parts of the city) it will appear as a cuboid box.

We note the involvement of Exeter Design Quality Partnership Design Review Panel and that they provided a written report, and although referred to in the Planning Statement the report is not presented in the applicant's documents. The Design Review Panel describes itself as transparent and accountable but we do not see evidence of that.

The summary of the report contained in the Planning Statement highlight a number of measures for improvement but it is unclear if the measures were adopted in the final design.

- variation in form/height could strengthen skyline response. Further refinement of massing, especially on the eastern approach was encouraged.
- Verney Street should be better activated (e.g. balconies, articulation, service solutions)
- Integration with The Printworks: Shared ownership offers potential for a more integrated design, including cohesive amenity spaces, improved permeability, and architectural coherence across both sites.

The Design Review Panel's support should be afforded limited weight, as the full review is not provided and selective quotations risk misrepresenting its conclusions. The DRP process is confidential and non-accountable; its comments cannot outweigh clear evidence of harm to local character and townscape coherence.

The proposal's scale, massing and street presence would create an unacceptable sense of enclosure. A sheer six-storey façade directly onto the pavement, without articulation or setbacks, intensifies the canyon effect, reduces daylight and sky visibility, and diminishes the human experience at street level. Policies require developments to be sympathetic to local character and create a high-quality public realm.

Social Amenity

The scheme provides no shared kitchen or dining facilities on any floor. Most amenity space is confined to the ground and fifth floors, with the largest space offering only a "Tea Point for light meals".

This implies that students will prepare all meals alone in their studios, which contain only two hobs and a small sink. "Reasoning used in the recent Heavitree Road Officer Report for co-living studio element was considered acceptable "Officers conclude that, despite small private spaces, the high-quality communal facilities and management will ensure a good standard of living for future residents." Despite students being present for 38 to 51 weeks a year the provision of high-quality communal facilities for cooking and eating are not provided here. Other university cities have taken a standards-based approach to ensure that student accommodation is attractive and supports the University in a competitive student market.

The proposed 18 sqm studio-only model falls below accepted standards for long-stay PBSA. Students who typically occupy PBSA for 38 –51 weeks, a majority (61%) prefer tenancy lengths of 38 to 44 weeks making their occupation comparable to mainstream PRS tenancies. Surveys show that communal kitchens and dining spaces are valued by ~90% of students benefitting from them. ([UCAS Accommodation Survey; Knight Frank Student Accommodation Report](#)).

The applicant refers to shared external social areas with The Printworks, but these are outside the applicant's control and depend on a separate management agreement. They therefore carry limited weight. Emerging Exeter Plan Policy H10 requires "sufficient communal facilities, services and external amenity space to meet student needs". This proposal does not meet that requirement.

Nationally Described Space Standards and BS 6465-2 set expectations for functional kitchen layouts and shared facilities where individual rooms are too small for full cooking provision. **We object to the absence of shared kitchens which represents a departure from good design practice and risks creating substandard living conditions.**

To achieve acceptable standards, the ground floor should include at least one communal kitchen/diner, with levels 2–6 providing two each.

Active Frontage

The Summerland Street frontage provides some active ground-floor uses, but the Verney Street elevation is dominated by plant rooms and louvred panels, with only three studios providing any animation. This results in a largely inactive frontage and does not create attractive and welcoming place with active street edges.

The applicant locates the plant room on Verney Street to facilitate a potential future connection to a District Heating Network (DHN). However, given the significant investment already proposed in on-site plant, it is doubtful that the developer would later incur the additional cost of connecting to a DHN. This limits the weight that can reasonably be given to this justification. A more active frontage could be achieved by relocating plant internally or reconfiguring ground-floor uses.

The three studios and amenity space facing the bus parking bays will experience reduced daylight, limited privacy and potential disturbance from pedestrian movements. Without a defensible buffer,

these rooms are vulnerable to external interference. Either the building should be set back to allow planting and defensible space, or the ground-floor studios should be relocated, with the fifth-floor amenity space brought down to street level to improve activation and surveillance. We note that proposed ground floor street facing bedrooms for the adjoining co-living block were replaced with a social space because of the lack of privacy and security.

Given the transition of this area from commercial to predominantly residential use, the applicant should negotiate with the highway authority to move the existing bus parking bays to an alternative location.

Provision for Disabled People

The proposal includes only six adaptable rooms (3%), which is significantly below best practice. While Exeter has no adopted PBSA-specific accessibility standard, the London Plan—frequently referenced by applicants—requires 10% of rooms to meet M4(3) wheelchair-user standards. Applying this benchmark, the scheme should provide at least 18 adaptable rooms.

The limited provision does not meet the needs of all users, and with the Public Sector Equality Duty, which requires local authorities to consider how planning decisions affect people with disabilities.

There is no disabled car parking provision, despite the Heavitree Road approval recognising that occupants may occasionally require access to a car and requiring a car-share scheme. A consistent approach should be applied here. If the bus bays were removed or reconfigured, accessible parking could be accommodated similar to the recently approved Clarendon House PBSA block. If this is not possible, as a minimum, **we recommend that the applicant negotiates with the owners of the two adjacent car parks to reserve spaces to users of this block or a co-car scheme.**

Cycle provision for disabled users is also inadequate. Only one oversize accessible cycle space is provided, with two additional spaces in visitor storage. There is no provision for mobility scooter or electric buggy storage, which is essential for inclusive design.

Public Realm

The indicative Copenhagen-style crossings of Summerland Street are welcome in principle, but no agreement is in place to deliver them. No indicative improvement to the crossing of Western Way is provided at its junction with Summerland Street which will be a key route for access to the LCWIP and Belmont Park.

We recommend A Section 106 contribution should be secured to ensure delivery of these or equivalent safe crossing facilities. This is consistent with the approach taken on the Heavitree Road scheme, where significant public realm improvements were required to support increased footfall and cycling activity.

Although this development represents an incremental increase in resident numbers, it nonetheless adds pressure to the local public realm. Improvements to pedestrian priority, lighting, planting and safe crossing points, to promote healthy, safe and inclusive communities and prioritise walking and cycling.

Cycling Provision

The applicant acknowledges that the site is highly accessible for cycling, yet the proposed cycle storage falls well below the minimum standard. A development of this scale requires 105 cycle spaces (95 residents, 9 visitors, 1 staff). The application provides only 73 spaces, including 55 resident spaces, 9 visitor spaces, 1 staff space and 8 pool bikes. The cycle store room lacks detail

that demonstrates it can accommodate even the number of cycles stated, let alone the minimum required for a development of this size.

While the provision of pool bikes is welcome, it does not compensate for the shortfall in dedicated storage. No evidence is provided to demonstrate that pool bikes reduce the need for personal cycle storage, and the ratio of 8 pool bikes for 180 residents does not indicate a realistic expectation of substitution.

Only one accessible cycle space is provided, which is insufficient and conflicts with inclusive design principles.

Both Exeter City Council and Devon County Council support the Exeter LCWIP, which states that redeveloped brownfield sites near the city centre should enable walking and cycling as the natural first choice for everyday journeys. To meet this objective, the full 105-space requirement should be provided, alongside safe, high-quality public realm improvements and north–south safe cycling provision on Summerland Street and its exits.

Yours faithfully

Chris Pope

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