

Planning Committee Report 25/0318/FUL

1.0 Application information

Number:	25/0318/FUL
Applicant Name:	Rok Prop Co (Exeter) Limited
Proposal:	New building comprising 8 levels purpose-built student accommodation (sui generis) with 108 self-contained studios, ancillary spaces at ground, first and eighth floor, and ground floor commercial unit (Class E(b)).
Site Address:	Former Site Of 26 - 28 Longbrook Street Exeter
Registration Date:	19 March 2025
Link to Documentation:	https://exeter.gov.uk/planning-services/permissions-and-applications/related-documents/?appref=25/0318/FUL
Case Officer:	Mr Christopher Cummings
Ward Member(s):	Cllr K Mitchell, Cllr M Mitchell, Cllr Palmer

This application is going to Planning Committee in accordance with the Delegation Briefing decision made on 08 July 2025.

2.0 Summary of recommendation

DELEGATE to GRANT permission subject to completion of a S106 Agreement relating to matters identified in the report and subject to conditions as set out in the report, but with secondary recommendation to REFUSE permission in the event the S106 Agreement is not completed within the requisite timeframe.

3.0 Reason for the recommendation:

The site has a precedent of acceptability established through the existing planning consents for a similar height building and number of Purpose-Built Student Accommodation (PBSA) bedrooms. In comparison to previous approvals this scheme moves the building away from the rear of the site and will see preservation of the medieval wall.

The proposal has been through pre-application and Design Review and the applicant has worked positively with the Council through both pre-application and application stages.

There is a continued, evidenced, demand for PBSA within the city and the city centre is identified as a suitable location in policy. Whilst there are other PBSA blocks in the surrounding area, this is to be expected within a policy-identified PBSA location, and there are a range of other dwellings in the vicinity. It does create an overconcentration of PBSA.

The massing has been increased in response to fire safety requirements; however, this is considered to give the opportunity for improvements on the previously approved scheme and has allowed for a stronger northern elevation facing Longbrook Street. The materials palette has been refined, with horizontal aspects linking better with the neighbouring John Lewis building and the introduction of a ground floor plinth.

Occupant amenity is considered acceptable, with two amenity areas and rooms of a comparable size to other PBSA blocks within the city. In line with other PBSA blocks it is accepted that the range of facilities available at the university campus will mitigate for this. There is no significant neighbour amenity impact identified, and the development would be subject to a management plan as well as conditions relating to noise levels from plant. The proposal will be car-free development and suitable cycle storage has been provided, alongside a Travel Plan to promote sustainable transport.

Having regard to the presumption in favour of sustainable development in paragraph 11 of the NPPF, and the specific need to deliver well-managed, purpose-built student accommodation in accessible city centre locations, the proposal is acceptable in principle. The scheme delivers a high-density form of development that responds to its context, is appropriately scaled, and includes sufficient mitigation to address potential amenity and management concerns. Subject to the panning conditions set out at the end of this report and the completion of a S106 agreement to secure a student management plan, local energy network connection, transport and GP surgery contributions, the development is recommended for approval.

4.0 Table of key planning issues

Issue	Conclusion
Principle of development	<p>A precedent has been set for a tall PBSA building in this location through two previous approvals. The positioning adjacent to the tall John Lewis building creates acceptability for a tall building in this location.</p> <p>The city centre is identified as a preferred location for PBSA in CS policy CP5. The city centre location also supports the ground floor</p>

Issue	Conclusion
	<p>café/restaurant use and will help to support the wider area.</p> <p>The principle of this development is therefore acceptable, subject to the material considerations set out in this report.</p>
Purpose Built Student Accommodation	<p>PBSA is now included in the Council's 5-year housing land supply calculations. The Council can currently only demonstrate a 4 year and 3-month supply and the tilted balance in favour of sustainable development is therefore in effect.</p> <p>CS policy CP5 identifies that PBSA should be provided to meet demand. The University SPG sets 9 principles for the Council which include supporting the expansion of the University and the provision of 'as much purpose-built student accommodation as possible to reduce the impact on the private housing market'. The latest calculations (2024) show that the increase in student numbers was higher than that last considered in 2018. The 2018 figures projected an increase of 1,143 students, however a level of 4,428 has occurred. This creates a clear demand for additional housing and no evidence of a decline in student numbers has been demonstrated.</p> <p>Across the city there is a requirement in CS policy CP5 for 75% or more of additional student numbers to be housed in PBSA.</p> <p>The latest calculations show that 103% of the additional numbers since 2006/07 have been provided. However,</p>

Issue	Conclusion
	<p>based on projected student numbers and current PBSA applications and approvals this will drop to 92% in 2028/29. This figure is based solely on the additional student numbers and does not consider the existing student population, which should also be provided for in purpose-built accommodation. There is therefore a clear need to provide PBSA to accommodate the increased numbers, as well as to provide PBSA for the existing levels and release HMO dwellings back into the private housing market.</p> <p>LP saved policy H5 requires that an over concentration of student housing does not occur. There is no definition of 'overconcentration,' 'imbalance,' 'area of the city' or how to assess this matter within the Local Plan or any other development plan document. This is a matter covered by a recent appeal in which the Inspector found that 4 PBSA blocks within 250 metres of a new PBSA application site was acceptable.</p> <p>The area surrounding this site has been assessed and there are 7 PBSA blocks within 250 metres of the site. 5 of these blocks are within 150 metres of the site.</p> <p>The surrounding area contains a range of other housing types and uses including flats, terraced dwellings, and commercial units. The area is also identified as a preferred policy location for PBSA and would therefore be expected to have a higher concentration of this type of accommodation.</p>

Issue	Conclusion
	<p>Having examined the level of PBSA in the surrounding area, and considering the matters set out above, there is no demonstrable imbalance or overconcentration of PBSA in this area and the proposal is therefore acceptable.</p>
Design	<p>A precedent has been set through the previous two approvals. The proposal being assessed has been through a pre-application and DRP and the applicant has worked positively with the Council to evolve the design.</p> <p>The overall height of the building is the same as previously approved, with a similar number of student bedrooms. The overall massing has increased however, due to an increase fire safety requirements.</p> <p>The split of external materials is welcomed, and revisions have made the horizontal elements tie in with the John Lewis façade. Particular attention was paid to the Longbrook Street elevation, which has seen additional detailing for this more visible element.</p> <p>The ground floor will be active, providing a public café/restaurant (Class E(b)) as well as student reception and ground floor amenity space. The front elevation will also provide access to bike stores and plant, and the rear will provide rear access to the commercial unit and bin stores.</p> <p>The 2nd to 7th floors are solely student rooms, including accessible units on each floor, and the 8th floor is student rooms and a shared amenity space.</p>

Issue	Conclusion
	<p>The student rooms are in keeping with the sizes of others in the city, with mitigation through student access to facilities on campus. It has been demonstrated that should the student population significantly decline the site could be readily changed to other accommodation types.</p> <p>A landscaping plan has been submitted for the area south of the building to provide planting and seating.</p>
Heritage Considerations	<p>The site does not contain any locally or nationally listed structures and is not within any Conservation Areas (CA). The site is close to Longbrook Street CA and St Davids CA and there is a medieval wall at the rear. The Exeter Tunnels Scheduled Ancient Monument sits near to the site and a variety of other listed buildings.</p> <p>The rear wall saw partial demolition for safety reasons during the demolition of the pub. The applicant has worked with the Council in the new design to move the rear building line away from the wall and to preserve the remaining aspects. A condition requiring recording and conservation is recommended.</p> <p>Concerns were raised by Historic England regarding vibration impacts on Exeter Tunnels. A statement was submitted in response to this that identified a negligible impact. The ECC Heritage Officer, in discussion with Historic England, advised that whilst negligible risk there should still be monitoring of the tunnels during construction. A pre-commencement condition is recommended for this.</p>

Issue	Conclusion
	<p>The submitted archaeological evaluation found pockets of low significance 17th and 18th century deposits. The ECC Heritage Officer recommended a watching brief condition as there is a risk of further deposits within the site.</p> <p>The submitted Heritage Statement considered the wider views of the site and the impact on heritage assets. Due to the positioning adjacent to John Lewis and separation from the historic fabric there is not considered to be any significant harm.</p> <p>With the use of a heritage management plan condition the heritage impacts are considered acceptable.</p>
Occupant Amenity	<p>Room and amenity spaces were discussed in the 'Design' section of this report and found to be acceptable.</p> <p>There is a risk of noise impact from any extraction units in the café and any roof plant. In addition, there is the risk of disturbance from the neighbouring highway.</p> <p>The Environmental Health team raised no objections subject to conditions controlling noise and an acoustic installation report.</p>
Neighbour Amenity	<p>The positioning of the building is not considered to create any significant loss of light or privacy to neighbouring properties.</p>

Issue	Conclusion
	<p>As stated previously, conditions are proposed in relation to plant noise levels.</p> <p>The development will be subject to a management plan. This will be secured via the S106 Agreement and will ensure appropriate measures are in place to minimise impacts including dealing with complaints and management of arrival/departures each year.</p> <p>A Construction Environment Management Plan has been submitted and is secured via condition.</p>
Highways	<p>The site is in the city centre, close to bus stops and railway stations and is suitable for car free development.</p> <p>Cycle storage is proposed, and it has been agreed for this to be monitored and increased, if necessary, with this secured by condition. Doors to the ground floor will be inward opening only to minimise the level of obstruction on Longbrook Street.</p> <p>Concerns were raised over delivery drivers visiting the site. There is a loading bay opposite the site on Longbrook Street that will be suitable for use for this purpose.</p> <p>Managing of student arrivals/departures each year will form part of the management plan to minimise impacts on the surrounding highway network.</p>
Biodiversity	<p>There is limited existing biodiversity on site and very limited space to provide</p>

Issue	Conclusion
	<p>enhancement. In line with national requirements a 10% biodiversity net gain has been secured through off-site habitat credits.</p> <p>The potential for bat roost in the neighbouring building was noted. A survey was undertaken which confirmed there were no bats.</p> <p>The site is within the zone of influence for the Exe Estuary, and an Appropriate Assessment was undertaken. This confirmed recreational impacts and will be mitigated through top-slicing of CIL.</p>
Contamination	<p>There is an identified contamination risk within the site and acceptable remediation measures have been proposed.</p> <p>This is acceptable subject to a condition requiring a verification report prior to first occupation.</p>
Air Quality	<p>The site is adjacent to an Air Quality Management Area.</p> <p>The development is car free and considered to have minimal impacts. This will be enhanced through a travel plan to promote sustainable transport measures for occupants.</p>
Drainage	<p>It is proposed for surface water to be dealt with through a connection to a combined sewer. This was found to be acceptable by the Lead Local Flood Authority, with suitable modelling provided to demonstrate this.</p>

Issue	Conclusion
Sustainability	<p>The development will be designed for future connection to a District Heating Scheme and funding towards the delivery of such a scheme will be secured in the S106 Agreement.</p>
S106 Obligations	<p>The following matters will be secured via a S106 legal agreement to make the development acceptable.</p> <p>DCC Highways - £600 per student room for improvements to the local cycle networks. £5,000 to cover any Traffic Regulation Orders required.</p> <p>NHS Integrated Care Board - £27,667 for expansion works to local GP surgeries.</p> <p>Local Energy Network - £19,564 towards implementation of a local low carbon energy supply.</p> <p>Management plan – Including student only occupation, managing of complaints and managing of moving in and out of the site.</p> <p>The following matters were requested but have not been agreed:</p> <p>ECC Public and Green Spaces – Requested a contribution towards local park improvements. The previous schemes did not require this, and other PBSA in the city has not been required to. Student occupants have access to facilities on campus.</p> <p>NHS Foundation Trust – Requested £26,842 for acute service provision. The Council is not currently accepting ‘gap’ funding requests.</p>

5.0 Description of site

The application site is a 0.48-hectare brownfield site located in Exeter City Centre.

The plot previously contained a public house which, following approval for redevelopment as Purpose Built Student Accommodation (PBSA), was demolished to base level and is currently fenced off from public access. There is a historic use of part of the site as a vehicle repair garage, with this part having been previously demolished.

The site is adjacent to the crossroads of Longbrook Street, New North Road, and Bailey Street. The primary frontage faces west onto Longbrook Street and the rear faces east onto a service yard accessed from King William Street.

The ground is sloped, with a level change within the site of 1-1.5 metres declining from south to north.

The site is adjacent to the tall John Lewis building, sited to the south-east, which is at a higher ground level due to the sloping topography. To the north are 3-storey terraced buildings in a mixed use of ground floor retail and upper floor flats. To the north-west, across Longbrook Street, is a 6-storey building comprising PBSA and to the south, across New North Road, are a range of large 3, 4 and 5 storey commercial buildings.

The site is within an Area of Archaeological Importance and is close to the Exeter Underground Passages, a Scheduled Monument, which are located to the south-west of the site boundary. Within the site is a partially demolished medieval wall that does not have any national or local listing.

The site is positioned close to the Longbrook Conservation Area and the St Davids Conservation Area, and the proposal will be visible from within them.

The site is adjacent to an Air Quality Monitoring Area that runs along Longbrook Street and New North Road. The site is identified as having a high risk of contamination due to former use as coach garage and there is a higher-than-average risk of radon.

The site is within the area covered by the St James Neighbourhood Plan.

6.0 Description of development

New building comprising 8 levels purpose-built student accommodation (sui generis) with 108 self-contained studios, ancillary spaces at ground, first and eighth floor, and ground floor commercial unit (Class E(b)).

The ground floor will consist of a 73sqm commercial unit (class E(b)), student housing reception and communal area, bin and bike stores and plant rooms.

The 1st to 7th floors are solely student rooms, with the 8th floor being a mix of accommodation and an additional social/common room.

The building itself is a single block with a staggered roof profile ranging from 6 to 9 stories, with the tallest part of the building adjacent to the existing tall John Lewis building.

7.0 Supporting information provided by applicant

- Covering Letter 1565/IG/1.1 (dated 13 March 2025)
- Noise Impact Assessment 11193A/GK (dated 19 February 2025)
- Contaminated Land Ground Investigation, Risk Assessment and Validation Report 18327/GI/R1 (dated 18 May 2023)
- Phase 1 Environmental Desktop Report 13839/R2 (dated 26 July 2017)
- Combined Phase 1 Environmental Desktop and Phase II Ground Investigation Factual and Interpretive Report 12035 (dated 14 January 2015)
- Phase III Remediation Strategy Report 12035 (dated 14 January 2015)
- Derwentside Environmental Testing Report 24-14362 (dated 05 December 2024)
- Planning Statement 1565/GS/IG/3.1 (March 2025)
- Design and Access Statement (March 2025)
- Preliminary Ecological Appraisal (12 March 2025)
- Fire Statement Form
- Transport Statement (dated 11 March 2025)
- Sustainable Travel Plan
- Sustainability and Ventilation Statement
- Waste Classification Report 24-14362.1 – Exeter King Billy – E5925R
- Statutory Biodiversity Metric (dated 11 March 2025)
- Heritage Statement ACD2826/2/1 (dated December 2023)
- Written Scheme of Archaeological Work ACD2826/1/0 (dated November 2022)
- Project Design for a Programme of Archaeological Work ACD2826/1/1 (dated October 2024)
- Results of an Archaeological Trial Trench Evaluation ACD2826/3/0 (dated November 2024)

Received 06 May 2025

- Preliminary Ecological Appraisal v2 (dated 02 May 2025)

Received 12 May 2025

- Foul and Surface Water Drainage Strategy P0050-FE-XX-XX-RP-C-0001 Rev P01 (dated 07 May 2025)

-

Received 28 May 2025

- Ecological Impact Assessment (dated 27 May 2025)

Received 26 June 2025

- Bailey Street View IMG1 Rev A
- Lbrook Street View IMG2 Rev A

Received 07 July 2025:

- Heritage Statement PR0324 (dated 30 June 2025)

Received 11 August 2025

- 1565-ROK-ZZ-RP-Z-Summary Student Need Assessment (dated July 2025)
- P0050-FE-XX-XX-LT-S-0001 - Response to Historic England (dated 08 August 2025)

8.0 Relevant planning history

Reference	Proposal	Decision	Decision Date
15/0645/FUL	Construction of a six-storey building for student accommodation (25 studio units).	PER	18.03.2016
17/0750/FUL	Demolition of the King Billy pub to build a mixed-use development scheme comprising of ground floor commercial units (Use classes A1, A3 and A4) with 108 bed space student accommodation above over 6 and 7 storeys	PER	27.04.2018
20/1769/FUL	Demolition of the former King Billy pub to build mixed-use development scheme comprising of ground floor commercial units (Use classes A1, A3	PER	17.06.2021

and A4) with 108 bed space student accommodation above over 6 and 7 storeys (Renewal of unimplemented planning permission 17/0750/FUL)

22/0507/NMA	Revised proposal for 97 bed scheme that includes a mix of 1 bed studio, 4, 5 and 7 bed flats, incorporating en-suite rooms and accessible units, with changes to internal layout and fenestration on east and west elevations (non-material amendment to 20/1769/FUL)	PER	31.05.2022
23/0017/DIS	Discharge of Condition 5 (Contamination Report) of approval 20/1769/FUL	CPA	25.01.2023
23/0018/DIS	Discharge of Conditions 4 (Construction Environmental Management Plan), 7 (Proposed Cycle Store) and 13 (Drainage) of approval 20/1769/FUL	CFD	09.02.2023
23/0069/NMA	Non-material minor amendment to rationalise floor plans including bin store, flat layouts, and roof terrace of approval 20/1769/FUL and 22/0507/NMA.	PER	23.01.2023
23/0136/NMA	Non-material amendment to vary trigger points of Conditions 6 (Archaeology), 12 (SAP calculations) & 14 (acoustics) of approval 20/1769/FUL	PER	09.02.2023

23/1215/VOC	Variation of Condition 2 of permission 20/1769/FUL to enlarge the 6, 7 and 8 floor levels and introduce an additional floor in the commercial space, change the ground floor commercial space to a Student Amenity area, change to 100% Studio Bedrooms, make changes to the external appearance and relocate the cycle store and plant buildings.	PER	16.02.2024
23/1331/NMA	Change the original description of approval 20/1769/FUL to "Mixed used development comprising of student accommodation for up to 97 beds, with communal areas and cafe (Use class E) on the ground floor".	PER	02.11.2023

9.0 List of constraints

The following constraints have been identified:

- Within an Area of Archaeological Importance.
- Within an area with higher levels of radon.
- Adjacent to Air Quality Monitoring Area.
- Adjacent to St Davids Conservation Area and Longbrook Conservation Area.
- Medieval wall within the site.
- Within St James Neighbourhood Plan area.
- Within the Zone of Influence for Exe Estuary

10.0 Consultations

All consultee responses can be viewed in full on the Council's website.

DCC Highways – No objection to proposal.

- Car free development is acceptable in this sustainable location and that suitable bike storage can be provided.

- There is a delivery bay opposite the site to prevent impacts on the public highway. There are existing dropped kerbs at the site will need to be reinstated as part of the development.
- A travel plan has been submitted and will promote sustainable transport measures.
- A contribution was requested of £64,800 towards local cycle and walking network improvements.

DCC LLFA (Drainage) – Originally raised an objection due to lack of information on surface water drainage management. Following discussions the objection was withdrawn. The development will connect into an existing combination foul and surface water sewer, and this was found to be acceptable.

DCC Waste Planning – No objection to proposal subject to a pre-commencement condition requiring a Waste Audit Statement.

ECC Building Control – Advised no comment as height of building requires consultation with the Building Safety Regulator.

ECC Ecology – Originally raised an objection due to potential for bat roosts in adjacent buildings and the need for an emergence survey to be undertaken. This was withdrawn following submission of a survey which advised no bats were recorded.

- The site will result in loss of all onsite habitats and the 10% BNG will be met by purchasing units from a local habitat bank. It is acknowledged that there is limited scope to deliver any on-site.
- Conditions were recommended to secure the mitigation measures set out in the submitted EcIA.

ECC Environmental Health – Raised no objection to the proposal subject to conditions regarding contaminated land remediation, reporting of unexpected contamination, plant noise, acoustic verification, and a Construction Environmental Management Plan.

ECC Heritage Officer – Originally raised objection due to lack of information on the wider impacts on historical fabric. Following submission of additional information the objection was withdrawn.

- The submitted archaeology report demonstrated 17th and 18th century deposits, and the consultation response recommended a further Archaeological Watching Brief due to the risk of additional deposits being found.
- The boundary wall to the site has seen partial demolition due to safety concerns and this is accepted. A condition is recommended for recording and conservation of the remaining section.

- Following concerns over vibration impacts on the Exeter Tunnel a report was submitted that demonstrated negligible impacts. A condition was recommended for monitoring during the construction phase to ensure this is the case.

ECC Parks and Green Spaces – Noted that no outdoor spaces are provided and proposal will increase demand on local public parks. A contribution for public open space, off-site outdoor leisure facilities and off-site playing fields was requested.

ECC Urban Design – Raised no objection to proposal. Comments were originally submitted querying amenity space and the quality of circulation spaces, changes to exit routes and door height designs, recommendations on elevation colours and detailing, improvements to public realm to the south and further details on materials. Further details were submitted to resolve these matters.

Building Safety Regulator – Raised no objections to proposal. Noted two areas of improvement in relation to fire alarm and evacuation alert systems and ensuring the lockable rear gate would allow emergency use at all material times. These matters are subject to later scrutiny, and it was stated that it 'is unlikely affect land use planning considerations'.

Designing Out Crime Officer – No objection to scheme. Recommendations were made in relation to CCTV, installation of a rear gate, façade designs to remove unwanted congregation, access controls, staffing levels, door locking system and management plan.

Devon Archaeological Society –Advised that further information is required. These include the wider visual impacts, as well as potential archaeological impacts on the line of the City's Mediaeval water supply.

Devon and Somerset Fire and Rescue Service – Advised that Building Safety Regulator would provide comments on the proposal.

Exeter Airport – No objection on safeguarding grounds. Advice notes provided on cranes and other construction issues.

Exeter Civic Society – Welcome the proposal to redevelop the site and do not object to the proposal. Concerns raised regarding detailing of the materials, plinth location, entrance door positioning, height of door heads and the need for active frontage. Did not consider that adequate amenity space has been provided and raised concerns over conflict accessing the bike stores and the level of cycle storage. It was noted that Transport Statement appears to be inaccurate with some distances and that public space enhancements to the south of the building would be welcomed.

Exeter St James Community Trust -

- Queried street address used on application form.
- Commented that a single commercial unit was not appropriate for the city centre location and that PBSA is no longer appropriate in this area.
- Application is ‘hugely retrograde’ when compared to the previous application.
- Proposal fails to provide a balanced and diverse community and will create overconcentration of PBSA in this area.
- The scale and massing are not broadly like that of Longbrook Street and do not respect its role in the backdrop for the Longbrook Conservation Area.
- Poor quality of amenity for occupants with cramped rooms and poor social spaces.
- Lack of adequate cycle parking.
- Lack of funding to improve Queens’ Crescent Garden.

Historic England – Originally raised objection due to lack of information on the impacts on the wider area and historical fabric. Following submission of additional information, the scheme was found to be acceptable.

- Concerns were raised over vibration impacts on Exeter Tunnels Scheduled Ancient Monument; however, following submission of a statement it was found that there would likely be negligible impacts and a pre-commencement condition requiring monitoring would be suitable.

Natural England – Noted that the site has potential for a harmful effect on Designated Sites and that an Appropriate Assessment should be undertaken and appropriate mitigation taken through the strategic solution in situ.

NHS Integrated Care Board – Requested contribution of £27,667 to mitigate for increase in demand on oversubscribed GP surgeries in the surrounding area.

Royal Devon University Healthcare NHS Foundation Trust – Requested contribution of £26,842 towards funding gap.

RSPB – No objection subject to a minimum of 12 General Purpose Integrated Boxes for birds, ideally on the East Elevation.

South West Water – Advised that the development meets the ‘Run-off Destination Hierarchy.’ There is a sewer in Longbrook Street that can be connected into and separate application to SWW will be required to secure this. Foul waste can be connected and clean potable water provided.

Wales and West Utilities – Advised that pipes are in the near vicinity of the site and safe digging practices should be adopted.

11.0 Representations

Nine objections have been received relating to this proposal raising the following matters:

- Site does not 'fit' with the surroundings.
- Too large, too tall, too ugly, and out of place in the context.
- There is already a surplus of student accommodation in the Longbrook Street area.
- Increase in litter, vomit, and occasional vandalism.
- Students should not be housed in such numbers that dominate the rest of the population.
- Too many PBSA buildings in the area
- Overbearing impact on Longbrook Street due to scale.
- No evidence of further demand for PBSA.
- Alternate use would help community imbalance caused by current high level of transient population.
- St James has disproportionately high levels of students, increased by over 60% in the last ten years.
- Demographic increase in 18-year-olds in the UK will peak in 2030, suggesting that home undergraduate numbers will become unsustainable after this point.
- Forecast for US economic growth for this year has been given biggest downgrade among advanced economies by the International Monetary Fund due to uncertainty caused by trade tariffs. It is likely that student numbers, and therefore demand for accommodation, will be affected by the potential negative impact of tariffs on global trade given that modern supply chains are so interlinked.
- Site should be affordable accommodation for local people rather than students
- Site is a significant gateway to city centre and will not be enhanced by this development.
- Site is close to residential homes in Longbrook Street and will impact on residents right to enjoy their homes.
- High number of delivery vehicles that will impact on the busy junction.
- Contrary to Local Plan policy H5(b) that states the development of student housing will be permitted provided that, "the proposal will not create an overconcentration of the use in any one area of the city which would change the character of the neighbourhood or create an imbalance in the local community".
- Contrary to Exeter St James Neighbourhood Plan which states at 5.1, "The Neighbourhood Plan seeks to ensure that St. James is a vibrant neighbourhood with a balanced and diverse community.
- Harm to important medieval wall.
- This is a new application and should be treated as such.
- PBSA developments have not led to increase in residential housing stock.
- Lack of infrastructure, e.g. dentists, GPs, and hospital.
- Impact on infrastructure due to community imbalance, such as local schools under threat.
- Impact on historical features in the Conservation Area, the Castle, the Cathedral, City Walls, underground passages, and archaeology.

- No outdoor amenity space for occupants.
- Impossible to enforce car-free occupation.
- Impact on the key road into the city centre during construction.
- Impact on pedestrian crossings during construction.
- Queens Crescent Gardens should be included in the contribution to green spaces.
- HMOs do not revert to family housing due to PBSA.
- Area is a ghost town outside of term time, with businesses closed.
- Management of drop-off/collection at each academic year.
- Concerns over deliveries to the site.

12.0 Relevant policies

National

National Planning Policy Framework

Planning Practice Guidance

National Design Guide

Adopted Development Plan

Exeter Local Plan First Review (adopted 2005)

Exeter Local Plan First Review saved policies:

AP1 – Design and location of development

AP2 – Sequential approach

E3 – Retention of Employment Land or Premises

H1 – Search Sequence

H2 – Location Priorities

H5 – Diversity of Housing

H7 – Housing for Disabled People

S1 – Retail Proposals/Sequential Approach

S5 – Food and Drink

T1 – Hierarchy of Modes

T2 – Accessibility Criteria

T3 – Encouraging Use of Sustainable Modes

T5 – Cycle Route Network

T9 – Access to Building by People with Disabilities

T10 - Car Parking Standards

T11 – City Centre Car Parking Spaces

C1 – Conservation Areas

C2 – Listed Buildings

C3 – Building of Local Importance

C5 - Archaeology

LS2 – Ramsar/Special Protection Area
LS4 – Local Nature Conservation Designations/RIGS
EN2 – Contaminated Land
EN3 – Air and Water Quality
EN4 – Flood Risk
EN5 – Noise
DG1 – Objectives of Urban Design
DG2 – Energy Conservation
DG3 – Commercial Development
DG4 – Residential Layout and Amenity
DG7 – Crime Prevention and Safety

Core Strategy (adopted 2012)

Core Strategy Policies:

CP1: Spatial Strategy
CP2: Employment
CP3: Housing
CP4: Density
CP5: Meeting Housing Needs
CP8: Retail
CP9: Transport
CP10: Meeting Community Needs
CP11: Pollution
CP12: Flood Risk
CP13: Decentralised Energy Network
CP14: Renewable and Low Carbon Energy
CP15: Sustainable Construction
CP16: Green Infrastructure
CP17: Design and Local Distinctiveness
CP17: Design and Local Distinctiveness
CP18: Infrastructure

Devon Waste Plan

Policy W4

St James Neighbourhood Plan

St James Neighbourhood Plan policies:

EN6: Biodiversity
DG1: Good Quality Design
D2: Retail and Commercial Frontages
C2: Large-Scale Purpose-Built Student Accommodation
SD3: Infill/Windfall Sites
SD4: Adapting to Climate Change
H1: Heritage

T1: Sustainable Transport
T5: Accessibility for all

Other material considerations

Exeter Plan (Regulation 19 Version, December 2024)

Exeter Plan policies:

S1: Spatial strategy
S2: Liveable Exeter principles
CC1: Net zero Exeter
CC3: Local Energy Networks
CC5: Future development standards
CC6: Embodied carbon
CC7: Solar-ready development
CC8: Flood risk
CC9: Water quantity and quality
H1: Housing requirement
H2: Housing allocations and windfalls
H3: Regeneration opportunity areas
H10: Purpose built student accommodation
H15: Housing density and size mix
H16: Residential amenity and healthy homes
EJ2: Retention of employment land
RFC1: The future of our centres
RFC2: Development in, and affecting, our centres
STC1: Sustainable movement
STC2: Active and sustainable travel in new developments
STC3: Supporting active travel
STC4: Supporting public transport
STC5: Supporting new forms of car use
STC6: Travel plans
NE3: Biodiversity
NE4: Green infrastructure
NE6: Urban greening factor
NE7: Urban tree canopy cover
HH1: Conserving and enhancing heritage assets
HH2: Conservation Areas
HH3: Archaeology
D1: Design principles
D2: Designing-out-crime
HW1: Health and wellbeing
HW2: Pollution and contaminated land
IF1: Delivery of infrastructure
IF3: Community facilities
IF4: Sport, recreation, and allotment space in new development

Planning Obligations Supplementary Planning Document (2014)

Sustainable Transport Supplementary Planning Document (2013)

Trees in Relation to Development Supplementary Planning Document (2009)

Public Open Space Supplementary Planning Document (2005)

Residential Design Guide Supplementary Planning Document (2010)

University Supplementary Planning Guidance (2007)

Longbrook Street Conservation Area Appraisal and Management Plan

St Davids Conservation Area Appraisal and Management Plan

13.0 Human rights

Article 6 - Right to a fair trial.

Article 8 - Right to respect for private and family life and home.

The first protocol of Article 1 Protection of property

The consideration of the application in accordance with Council procedures will ensure that views of all those interested are considered. All comments from interested parties have been considered and reported within this report in summary with full text available via the Council's website.

It is acknowledged that there are certain properties where they may be some impact, but this can be mitigated using conditions. However, any interference with the right to a private and family life and home arising from the scheme as a result of impact on residential amenity is considered necessary in a democratic society in the interests of the economic well-being of the city and wider area and is proportionate given the overall benefits of the scheme in terms of provision of housing and retail employment.

Any interference with property rights is in the public interest and in accordance with the Town and Country planning Act 1990 regime for controlling the development of land. This recommendation is based on the consideration of the proposal against adopted Development Plan policies, the application of which does not prejudice the Human Rights of the applicant or any third party.

14.0 Public sector equalities duty

As set out in the Equality Act 2010, all public bodies, in discharging their functions must have "due regard" to the need to:

- a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard in particular to the need to:

- a) removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of other persons who do not share it
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Whilst there is no absolute requirement to fully remove any disadvantage the Duty is to have “regard to” and remove OR minimise disadvantage and in considering the merits of this planning application the planning authority has had due regard to the matters set out in section 149 of the Equality Act 2010.

15.0 Financial issues

The requirements to set out the financial benefits arising from a planning application is set out in s155 of the Housing and Planning Act 2016. This requires that local planning authorities include financial benefits in each report which is: -

- a) made by an officer or agent of the authority for the purposes of a non-delegated determination of an application for planning permission; and
- b) contains a recommendation as to how the authority should determine the application in accordance with section 70(2) of the Town and Country Planning Act 1990.

The information or financial benefits must include a list of local financial considerations or benefits of a development which officers consider are likely to be obtained by the authority if the development is carried out including their value if known and should include whether the officer considers these to be material or not material.

Material considerations

Contributions to health care and cycle/pedestrian improvements.
Employment servicing the PBSA block.

Employment in the café/restaurant.

Non-material considerations

CIL contributions

The adopted CIL charging schedule applies a levy on proposals that create additional new floor space over and above what is already on a site. This proposal is CIL liable.

The rate at which CIL is charged for this development is £153.94 per sq. metre plus new index linking. Confirmation of the final CIL charge will be provided to the applicant in a CIL liability notice issued prior to the commencement of the development. All liability notices will be adjusted in accordance with the national All-in-Tender Price Index of construction costs published by the Building Cost Information Service (BCIS) of the Royal Institute of Chartered Surveyors for the year when planning permission is granted for the development. Full details of current charges are on the Council's website.

The proposal will generate business rates for the retail/café use.

16.0 Planning assessment

1. Two previous approvals at this site for Purpose Built Student Accommodation (PBSA) have been granted under references 17/0750/FUL and 20/1769/FUL. These included Design Review Panel (DRP) discussions and the 20/1769/FUL was lawfully commenced through the demolition of the King Billy Public House.
2. This application has been subject to a pre-application, 24/1095/MP, which included Design Review Panel (DRP) assessment, and has seen several revisions made in response to the comments.

Principle of Development

Policies

3. Local Plan (LP) saved policy AP1 states that development should be designed to raise the quality of the urban and natural environment and reduce the need for car travel. The design of the development will be discussed later in this report; however, the proposal will be car free development.
4. LP saved policies AP2 and H1 state that priority is given to development on previously developed land and within existing centres. The site is brownfield and therefore meets the policy requirement.

5. LP saved policy H2 sets out a sequential search sequence for development. This includes development within the city centre and car-free city centre development, and the proposal meets this requirement.
6. Core Strategy (CS) policy CP1 seeks 12,000 dwellings within the plans lifetime, with 200 of these being within the City Centre. PBSA is now included within the Council's 5-year housing supply, and the proposal supports this.
7. LP saved policy H5 states that student housing must be located to limit the need to travel to the campus by car, not create an overconcentration in an area and will not harm the character of the building and locality. The proposal is for car-free development and is in the City Centre on sustainable transport routes and within walking distance of the university. It meets the policy requirements in principle, with the details assessed further in this report.
8. CS policy CP5 states that 'purpose-built student accommodation should be provided to meet the housing need' and this proposal meets this requirement. The supporting text for CP5 also states that PBSA should be located on, or close to the university campuses, at sustainable locations at or near major transport routes or in the City Centre. This proposal is in the City Centre and is a suitable, sustainable location.
9. St James Neighbourhood Plan (NP) seeks appropriate new development in suitable locations. Policy C2 states that large scale PBSA should be in locations that are not predominantly characterised by intact terraced streets and 2-3 storey development and where the scale and massing will be broadly like that of surrounding buildings. The site is in the City Centre and adjacent to tall buildings and the principle therefore meets the policy requirements.
10. Emerging Exeter Plan policy H10 states that developments for PBSA will be supported where they are on the campus, a sustainable location or in the city centre. This is subject to suitable amenity, active travel provision, and management. This proposal is within the city centre and is a sustainable location. The other matters will be considered later in this report.

Site history

11. There is a level of acceptability for PBSA in this location, with previous planning approvals for PBSA granted under references 17/0750/FUL and 20/1769/FUL. Approval 20/1769/FUL has lawfully commenced through the demolition of the King Billy public house. However, it has been acknowledged by the applicant that the approved scheme could not be delivered in its current form as it would not meet the latest building safety requirements.

Scale and massing principles

12. The proposal is a 9-storey building and the St James NP policy D1 requires development to respect the scale and character of the surrounding area. LP saved policy DG1 also requires height to be appropriate to the surrounding townscape and relate to adjoining buildings, spaces, and human scale.
13. The proposal is adjacent to the tallest building in the city, John Lewis, and a range of other large buildings. The principle of a tall building in this area is therefore acceptable in principle, subject to the material assessment undertaken in the 'Design' section of this report.

Principle of PBSA

14. CS policy CP5 states that 'Purpose built student accommodation should be provided to meet the housing need.' This is supported by the University Supplementary Planning Guidance that identifies 9 principles for the Council which include 'supporting the intention of the University to expand' and seeking 'the provision of as much purpose-built student accommodation as possible to reduce the impact on the private housing market.' The emerging Exeter Plan policy H10 also states the city centre as a suitable location for the siting of PBSA. LP saved policy H5 states that development will not create an overconcentration in an area.
15. PBSA in this location is therefore acceptable in principle, subject to assessment of the overall levels in the surrounding area later in this report.

Principle of commercial use

16. The proposed ground floor commercial unit is for Use Class E(b), sale of food and drink for consumption (mostly) on the premises. LP saved policy S5 states that food and drink premises should be within the City Centre, district centres, or local centres. In addition, the commercial use supports CS policy CP17 by helping create a viable city centre and encouraging visitors to the area.
17. The site immediately adjoins the secondary shopping area identified in the LP. Whilst outside the identified shopping areas, a cafe/restaurant use in this location would be acceptable, helping to support the wider retail function of the city centre and provide an active frontage. It is therefore acceptable in principle.

Principle Conclusions

18. The development is acceptable in principle, subject to the material considerations detailed in the following parts of this report.

Purpose Built Student Accommodation

Housing Land Supply

19. The national planning policy guidance (PPG) for Housing Supply and Delivery notes that student housing ‘...can in principle count towards contributing to an authority’s housing land supply based on:
 - a. The amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and/or
 - b. The extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.’
20. Exeter has previously been unable to include PBSA within its five-year housing supply calculations due to issues with evidence and wording of an older version of the PPG. This has since changed and PBSA can now be included (detailed in full in section 4 of the Council’s Five-Year Housing Land Supply Statement, May 2025). The delivery of this PBSA scheme will therefore help with meeting the overall housing targets.
21. Paragraph 11(d) of the NPPF states that where the housing supply target cannot be met there is a tilted balance in favour of development. The Five-Year Housing Supply Statement concludes that Exeter can currently demonstrate a supply of 4 years and 3.2 months, therefore the tilted balance is in effect.
22. It is relevant to note the tilted balance had not previously applied to PBSA proposals within Exeter. However, as PBSA is now included within the housing land supply figures it is now applicable to this type of proposal.

Policy requirements

23. CS policy CP5 states that ‘Purpose built student accommodation should be provided to meet the housing need.’ This is supported by the University Supplementary Planning Guidance that identifies 9 principles for the Council which include ‘supporting the intention of the University to expand’ and seeking ‘the provision of as much purpose-built student accommodation as possible to reduce the impact on the private housing market.’
24. Alongside this is LP saved policy H5, which states that student housing must not create an overconcentration in an area and will not harm the character of the building and locality. It is acknowledged that other PBSA developments have been delivered and approved since the previous permission 20/1769/FUL on this site and therefore consideration must be given to this aspect.
25. The Greater Exeter Student Housing Needs Assessment (November 2024) (SHNA) has recently been produced as part of the emerging Exeter Plan evidence base. There are several important aspects raised by this document when considering PBSA that will be considered through this section of the report.

26. Planning permission 20/1769/FUL has lawfully commenced. Whilst it is noted that it is no longer possible to build that exact scheme due to changes in building safety requirements, it does still set a precedent of acceptability for PBSA in this location.

Student Numbers

27. Based on the latest figures available to the Council there is a continued increase in the student population and therefore an associated need to provide suitable housing.
28. The 2018 SHNA estimated an increase of around 229 students per annum in the period 2017 to 2021, a total of 1,143 additional students.
29. The 2024 SHNA states that in practice the growth was much higher through this period, with an average rate of 886 per annum, a total of 4,428 additional students. The table below (Figure 1), extracted from the 2024 SHNA demonstrates the growth and predicted futures levels. It relevant to note that the high figure of 2,474 students added in 2021/22 was likely due to students not being accounted for in census results due to the pandemic.

Past student numbers studying at the University of Exeter (Exeter campuses only)					
Year	Student FTE (inc. inter- national)	Less part time	Less live at home (assumed 3.5%)	Annual increase	Cumulative increase
06/07	11,170	10,639	10,267		
07/08	12,285	11,754	11,343	1,076	1,076
08/09	13,324	12,633	12,191	848	1,924
09/10	14,852	14,236	13,738	1,547	3,471
10/11	15,333	14,828	14,309	571	4,042
11/12	15,987	15,529	14,985	676	4,719
12/13	15,852	15,360	14,822	-163	4,556
13/14	16,512	16,017	15,456	634	5,190
14/15	17,354	16,913	16,321	865	6,054
15/16	18,459	17,964	17,335	1,014	7,069
16/17	19,430	18,841	18,182	846	7,915
17/18	20,058	19,527	18,844	662	8,577
18/19	20,809	20,217	19,509	666	9,243
19/20	22,360	21,546	20,792	1,282	10,525
20/21	24,586	23,430	22,610	1,818	12,344
21/22	27,276	25,994	25,084	2,474	14,818

Figure 1: Annual Student Numbers for the University of Exeter (Source: University and Exeter City Council Records) – Taken from Figure 1 of the SHNA (2024).

30. There is therefore an identified increase in student housing requirements to meet the growing numbers at the university that must be accommodated within the city.
31. The SHNA notes that there is a level of uncertainty over national student numbers, a matter also raised in public comments. The SHNA does consider that a decrease would go against the recent trends for rapid expansion of universities. At the time of this report no decrease has been demonstrated to be occurring in Exeter. In the interests of future-proofing the development, and considering EP policy H10, alternate long-term uses of the building has been discussed with the applicant. It has been demonstrated that should the PBSA market significantly decrease the building could be adapted to provide apartments in a variety of unit sizes. Any such change would require separate planning permission from the Council.

City-wide PBSA levels

32. The supporting text for CS policy CP5 states that '75% or more of additional student numbers should be accommodated in purpose-built student housing. It is relevant to note that this level is not included within the CP5 policy wording itself and, as demonstrated by national caselaw (*R (Cherkley Campaign Ltd) v Mole Valley DC*) the supporting text cannot be used to require a specific compliance. The 75% minimum level is also stated as one of the nine principles within the University SPG.
33. The policy wording recommends that 75% or more of additional student numbers be within PBSA (emphasis added for this report). This is a minimum level only and applies solely to the increase in additional student numbers as the university has continued to grow. It should therefore be a base level target with the aim being to exceed it, with any additional supply reducing HMO demand and potentially releasing existing HMOs into the housing market.
34. The Council's latest calculations identified 12,908 PBSA bedspaces in the city. Based on the figures since 2006/07 this would demonstrate that 103% of the total additional student numbers have been accommodated within PBSA. Due to delivery times and the nature of the planning system this is the overall delivery for this period, with some years failing to deliver the 75% and others exceeding that level.
35. The future growth of the university is also of relevance, with planning permission granted for a further 1,664 additional PBSA bedspaces, creating a total of 14,572 bedspaces in the city. Based on the projected student numbers this would see a total supply of 92% bedspaces for additional students in the period 2006/07 to 2028/29. This demonstrates the fluctuating nature of PBSA delivery and the need for continued provision of PBSA to support the university's long-term continued growth.

PBSA Levels and 'Overconcentration'

36. Public comments raised a potential issue of overconcentration of student housing in the Longbrook Street area.

37. LP saved policy H5 refers to these matters; however, the policy wording does not include any definition stating at what level there is an overconcentration.
38. The applicant has submitted a Summary of Student Need Assessment which demonstrates a 27% increase in student numbers since 2017/18 and a level of 2 students in the city for every PBSA bed available.
39. The Council has also undertaken its own research into this matter. Whilst there are some variations between the figures provided by the applicant and the Council's calculations the overall conclusions are the same, that there is an identified increasing demand for PBSA housing within the city. The Council's assessment is set out below.
40. Several PBSA blocks have been delivered since 2011 with census records demonstrating an overall increase of PBSA bedspaces from 4,433 in 2011 to 8,129 in 2021. The 2024 SHNA notes that if the PBSA stock had not grown along with the student population, an additional 1,000 private dwellings would have been required to accommodate the increased levels.
41. In considering LP saved policy H5 it is important to recognise that the definition of 'student housing' includes both Houses in Multiple Occupation (HMOs) and PBSA. These are very different uses and, as noted in the PPG and 2025 SHNA, the provision of PBSA helps in limiting the additional demand on dwelling houses to be converted to additional HMOs to accommodate the student population, as well as allowing the return of existing HMOs to market dwellings.
42. HMO levels are already controlled through the Article 4 Direction and should be reduced by providing PBSA and therefore the focus should be on whether there is an overconcentration of PBSA within this area, rather than just students in general.
43. A recent allowed appeal at another PBSA site (21/1014/FUL – 68-72 Howell Road) is of significance in considering the PBSA levels. The Inspector noted in the decision letter that 'area of the city,' 'over concentration' and 'imbalance in the local community' are not defined in LP saved policy H5. In reference to that appeal, which is not within an identified suitable location, the Inspector noted that four PBSAs plus the appeal proposal within 250 metres would not demonstrate an overconcentration.
44. The St James Neighbourhood Plan (NP) notes within the supporting text on page 25 that appropriate housing should be provided to improve the social balance of the ward, with a currently imbalanced level of HMOs and other forms of residential properties. However, NP policy C2 (Large Scale PBSA) does not specifically refer to 'balanced communities' with this only referred to in policy C3 (Small Scale PBSA). This is of particular significance, with the Inspector on the Howell Road appeal stating that 'whilst it may be unexpected that such considerations apply to small scale PBSA and not large scale PBSA, they are not stated as applying to large scale PBSA and

policy C3 is not a relevant policy in relation to the current appeal'. The same circumstances apply to this scheme and therefore the NP does not require consideration of 'balanced communities' as it is not stated as a requirement by policy C2. Therefore, the NP policies are not applicable in assessing this matter.

45. There is still a requirement to consider overconcentration and imbalance due to LP saved policy H5. To do so it is necessary to understand the overall levels of PBSA and other dwellings in the surrounding area to identify whether there would be an imbalance created in line with LP saved policy H5.
46. As stated above there is no specific definition of 'area of the city' or stated measure to assess what imbalance would be. A broad exercise has been undertaken, based on previous experience of assessing schemes. To do this a circle was drawn with a radius of 250 metres from the centre of the site and the use of each property identified. This demonstrated that there are 7 PBSA blocks are within 250 metres of the site. When examined further, this identifies 5 PBSA blocks within 150 metres. However, these figures do not demonstrate an imbalance on their own and the context of them must be considered.
47. PBSA blocks are not the sole land use in the surrounding area, which includes commercial uses in Sidwell Street, Princesshay and the High Street, as well as on surrounding streets. In addition, there are significant amounts of non-PBSA housing including terraced housing on Longbrook Street and Longbrook Terrace, primarily converted to flats, as well as other dwellings on New North Road, King William Street and in Princesshay. The level of non-student occupation is noted in public comments on the scheme, stating that 'This site is very close to residential homes in Longbrook street - we still have many permanent residents living on the street or the surrounding streets.'
48. The level of PBSA must be considered alongside policy and guidance, which identifies the city centre as a preferred location for this type of development. The supporting text for CS policy CP5 states that 'New purpose-built student housing should be located on, or close to, the University Campuses, at sustainable locations at or near to major transport routes, or in the City Centre.' The city centre location is also in accordance with the policy wording of LP saved policy H5(d) which requires that 'Student accommodation is located so as to limit the need to travel to the campus'. In addition, the University SPG identifies that the Council will favour student accommodation within the city centre, and the emerging Exeter Plan policy H10 states that PBSA will be supported when located in the city centre.
49. It is clearly demonstrated in policy and guidance that the city centre is a preferred location for PBSA and a significant level of them should therefore be expected in this area. Whilst there are PBSA blocks within the surrounding area it is also surrounded by a mix of commercial uses and other housing, including flats, houses and HMOs creating a mix of use types. It is therefore considered, on balance, that there is no

demonstrable imbalance or overconcentration of PBSA within this part of the city and it would not be reasonable to refuse the application on these grounds.

PBSA Conclusions

50. As demonstrated above, both existing policy and guidance and the emerging Exeter Plan state the city centre as a preferred location for PBSA blocks to meet identified demand generated by the university's growth. NP policy C2 does not state preferred PBSA locations; however, it does look for large scale PBSA to be sited where the scale and massing is like surrounding buildings which would be met by this city centre location.
51. LP saved policy H5 notes that PBSA should not create an overconcentration in an area but does not provide details on what is 'overconcentration', 'imbalance in the community' or what an 'area of the city' should be defined as. There are 7 PBSA blocks within 250 metres of the site, 5 of which are within 150 metres, alongside a range of flats, houses, and commercial dwellings. The PBSA blocks are not considered to create a demonstrable significant imbalance or overconcentration when taking into account that the city centre is an area identified as suitable for PBSA and would therefore be expected to have higher levels of such development.
52. Whilst not a policy requirement, there is an agreement between the University and the Council to accommodate 75% or more of additional student numbers in PBSA as stated in the supporting text for CS policy CP5 and the University SPG. It can be demonstrated that since 2006/07 a level of 103%, has been delivered. Forecasting work shows this as decreasing to a level of 92% by 2028/29. It is key here that the 75% is a minimum target and that any level exceeding this would assist in the release of HMOs back into the private housing market and preventing further homes being converted.
53. It is therefore concluded that due to the policy stated acceptability for PBSA in the city centre, the precedent set by the previous approvals and the range of non PBSA housing in the surrounding area, there would not be an overconcentration or community imbalance created by this proposal.

Design

54. LP saved policy DG1 states that development should:
 - a. Be compatible with the urban structure of the city, connecting with existing routes and spaces and putting people before traffic.
 - b. Ensure the building grain promotes the urban character of Exeter.
 - c. Fully integrate landscape designs into the proposal.
 - d. Be at a suitable density.
 - e. Contribute to a compatible mix of uses.

- f. Be of an appropriate height to the surrounding townscape and that the constituent parts of buildings relate well to adjoining buildings, spaces, and human scale.
 - g. Ensure the massing relates well to the character and appearance of the townscape and surrounding buildings.
 - h. Ensure local distinctiveness and contribute positively to the visual richness and amenity of the townscape.
 - i. Use materials that relate to the palette of materials in the locality and reinforce local distinctiveness.
55. LP saved policy DG2 states that development should maximise conservation of energy, including best use of land, maximising solar gain and suitable landscaping schemes.
56. LP saved policy DG4 relates to residential development and requires the maximum feasible density, quality of amenity and contribution to the townscape.
57. LP saved policy DG7 requires a safe and secure environment including overlooking of public spaces, integrated crime prevention measures and deterring and reducing fear of crime.
58. LP saved policy T9 requires development for non-domestic buildings to ensure safe and convenient access by people with disabilities.
59. CS policy CP4 requires residential development to be at the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network.
60. CS policy CP17 states that development must exhibit a high standard of sustainable design that is resilient to climate change and complements or enhances Exeter's character, local identity, and cultural diversity.
61. St James NP policy D1 requires good quality design that respects the scale and character of the surrounding area, building lines, use of materials, meeting 'Secured by Design' standards, adopting sustainable urban drainage and achieving low carbon sustainable design.
62. St James NP policy D2 requires that new shop frontages be of a high-quality design and should complement the rest of the building and improve the character of the local environment.
63. As stated previously, there is a precedent set for a tall PBSA building in this location through the previous approvals 17/0750/FUL and 20/1769/FUL. The number of

bedrooms, 108, is the same as previously approved under 20/1769/FUL and the maximum height in comparison to the neighbouring John Lewis building is identical. The primary change is an increase in massing of the upper floors, in part to accommodate the fire safety requirements.

64. The pre-application process considered the height and the importance of the views along Longbrook Street, with the need to present a strong elevation, particularly on the more visible top floors. This has been addressed through a stepped back approach to the upper aspects, with window, elevation design and materials creating a further visual 'step.' The DRP welcomed the three plans of punctured elevation, and revisions were made to floor levels and elevations to meet their request for stronger horizontal elements to tie in with the John Lewis façade, including a ground floor plinth. The more distinct upper floor area was welcomed by the DRP and the Council's Urban Designer, with further changes made to improve the window banding and design of the upper floors, including revisions on the northern elevation to create a stronger appearance when viewed from a distance.
65. The site itself is very constrained with no external amenity space possible. The front, west, elevation abuts Longbrook Street and includes the café and student entrances, as well as protected fire access points and access to the plant room and bike store. There is a risk of conflict with pedestrians and bike store users, and a condition is proposed to ensure the doors are inward opening and key fob activated, to minimise waiting times on the pavement area.
66. The south-west elevation is adjacent to a public space by John Lewis. This is currently an open space with no landscaping, seating, or other public enhancements. It has been agreed with the applicant to improve this area through provision of a tree with seating area around it. This is a welcome improvement to this area, and a condition is recommended for technical details, maintenance, and delivery prior to first occupation.
67. The eastern side has been pulled away from the medieval wall and the only access to this area is for access to the rear of the commercial unit, commercial bin store and for collection of the resident bin store. Access for bin collection will be via the John Lewis service yard and King William Street.
68. Internally the building consists of a small café unit on the ground floor. Comments have been made regarding the size and overall provision of commercial units in comparison to the previous scheme. Internal space has had to be given over to fire safety routes and ground floor space has been utilised to create amenity space and a reception area for the PBSA. The site is within the city centre, but not within a primary or secondary shopping area, as identified in the LP. Therefore, a lower level of commercial ground floor use is acceptable. Active ground floor use will occur through the café use and the student reception/amenity space which is considered

acceptable for this location. The provision of facilities within the café will form part of their licensing requirements, separate from any planning approval.

69. The 1st floor will be student studio rooms, including an accessible room, as well as a laundry room for occupants. The 2nd to 7th floors are student rooms, with an accessible room on each floor and the 8th floor is student rooms and a second amenity space.
70. In terms of occupant amenity, it is noted that the bedrooms do not meet the Nationally Described Space Standards, and no external amenity space is provided. This is common for PBSA development in the city, with mitigation through the students having access to a range of facilities at the university campuses.
71. The Council's Parks and Green Space team requested a financial contribution towards public spaces and parks. Whilst this is acknowledged, the students have access to a range of university facilities that would limit the level of impact on the public spaces. This is a standard approach to PBSA schemes within the city, and it is not considered that this site would be any different. The scheme is also subject to Community Infrastructure Levy payments which includes a general contribution to public spaces.
72. Comments raised the possibility of decreasing student numbers within the city. As discussed previously this has not been demonstrated; however, the need to 'future-proof' the development was discussed at pre-application and is relevant to the design of the building. The layout of the building is suitable for conversion into flats of a variety of sizes if required.
73. As the building is over 7 storeys in height the proposal must be assessed by the Building Safety Regulator. The first stage of this, Gateway One, has been undertaken as part of this planning application. The response raised no objections on land use planning matters, with suitable staircase numbers, location and emergency route provided. It noted two issues for the next stage, in relation to the type of alarm system and ensuring a rear gate still has emergency access. These are matters that will be picked up through the fire safety process outside the planning system. It is therefore not necessary to resolve them here.
74. In conclusion, the overall design, massing, and layout of the proposal is acceptable for this development. A precedent has been set through the previous approvals and the number of student rooms, and the maximum height is the same as previously approved. The commercial unit and student reception/amenity create an active ground floor level and suitable internal amenity has been provided. The design of the building has been through pre-application and DRP and has the revisions put forward have been adopted into the final scheme.

Heritage Considerations

75. LP saved policy C1, C2, C3 and C4 require that development in or affecting a Conservation Area, Listed Building, building of local importance or a park and garden of special or historic interest must have regard for character and setting of each relevant historic feature.
76. LP saved policy C5 requires that assessment and either preservation or recording works occur on sites of national archaeological importance.
77. St James NP policy H1 requires development affecting heritage assets to pay special regard to the need to conserve and enhance their settings.
78. The site does not contain any nationally or locally listed structures within it; however, it is adjacent to a Scheduled Ancient Monument (Exeter Tunnels) and is adjacent to the Longbrook Street Conservation Area and St Davids Conservation Area. In addition, the height of the building has the potential to impact on wider heritage assets such as the Cathedral.
79. Within the site there is a rear wall which has been confirmed as medieval in origin, albeit extended and repaired in places. This wall has no national or local designation; however, it is considered of local historic interest. During the demolition works under the previous approval 20/1769/FUL it was found that the wall was collapsing, and it was agreed with the Council that emergency work to remove the dangerous aspects could be undertaken. Since that occurred, and through the pre-app process, the applicant has worked with the Council to identify the best way of preserving the remains of the wall. The submitted scheme moves the building away from the historic wall, with the top part remaining visible from the rear yard. The Council's Heritage officer accepted the need for the partial demolition for safety reasons and the redesign of the scheme to preserve the remaining section is welcomed. A condition is recommended for recording and conservation of the remaining element.
80. With regards to the wider historical impacts, an updated Heritage Statement was submitted during the application process. This identified potential impacts on several historical features in the surrounding area, through indirect impacts of views from the surrounding area. These views were primarily obscured by intervening trees and buildings, with the John Lewis building sitting taller. Historic England specifically noted the potential impact on longer views from Cowick Barton Recreational Ground, however due to the positioning adjacent to John Lewis and the separation of the site from other visible buildings, specifically the Cathedral, it is acceptable.
81. In relation to the Conservation Areas, the submitted Heritage Statement notes that this part of the city centre is not in keeping with them, being of much more modern design. It was considered that the wider views from and of the Conservation Areas

would not be significantly impacted and there will be masking of the dominance of the John Lewis building. It was concluded that there would be negligible effect from the development.

82. The site also had the potential for archaeological remains, and a scheme of investigation was undertaken prior to this application. The submitted report noted pockets of low significance 17th and 18th century layers. The ECC Heritage Officer advised that there is still the potential for further archaeological deposits and recommended a condition for a watching brief in areas not already assessed by the submitted evaluation.
83. Historic England raised concerns that the construction works could generate vibration impacts on the Exeter Tunnels Scheduled Ancient Monument. A report was submitted in response to this which identified that the proposed works would have a negligible impact on them. The ECC Heritage Officer, in consultation with Historic England, consider that as there is still, an admittedly small, risk that there is need for monitoring. Recent surveys have been undertaken of the tunnels, and it has been agreed that monitoring equipment could be installed in the tunnels. A condition is therefore recommended for a monitoring program prior to commencement on site.

Occupant Amenity

84. LP saved policy DG4 states that residential development must ensure a quality of amenity which allows residents to feel at ease within their homes and gardens.
85. The room and amenity spaces have been considered in the Design section of this report and will not be repeated here.
86. There is a risk of noise impacts from the use of plant, both from the café and the roof plant, as well as noise from the4 neighbouring highway. The Council's Environmental Health team raised no objections to the proposal subject to conditions relating to plant noise, and an acoustic installation report.
87. A management plan will be secured within the S106 Agreement to ensure suitable management for occupants.

Neighbour Amenity

88. LP saved policy H5 states that development should not harm the amenity of neighbouring occupiers.
89. LP saved policy EN5 requires that noise generating development do not adversely increase the noise experienced by existing and proposed users.

90. The positioning of the building is such that it is not considered to create any significant loss of light or privacy to neighbouring properties. The Council's Environmental Health team raised no objection, recommending a condition for details of plant to ensure noise levels do not significantly increase in this area.
91. Concerns were raised regarding the risk of anti-social behaviour from a high level of students. A management plan will be secured through the S106 legal agreement, which will need to be submitted and approved by the Council prior to first use. Using such a measure it is considered that amenity impacts can be appropriately managed.
92. A Construction Environment Management Plan was submitted with the application. This was as agreed for the previous scheme and is acceptable. Compliance is recommended to be secured via condition to minimise the impacts on the surrounding area.

Highways

93. LP saved policy T1 states a hierarchy for transport modes, with sustainable measures such as walking and cycling above public transport, with cars being at the lowest level. This is read alongside saved policy T2 which requires development to be within walking distance of a food shop and other facilities.
94. LP saved policy T3 requires development to safeguard existing walking and cycling routes.
95. LP saved policy T11 requires that City Centre development does not create a significant change in the number of off-street parking spaces. There are none impacted by this scheme.
96. LP saved policy H5 states that student accommodation should be located to limit the need to travel to the campus by car.
97. St James NP policy T1 requires proposals to enhance the attractiveness of walking, cycling and public transport.
98. A Transport Statement was submitted with the application, and it is noted that there some errors within it in relation to the closest entrance to Central Station and the location of the nearest convenience retail store. Whilst these errors are noted, the overall conclusions of the document are correct, and the site is a sustainable location suitable for car free development and that there will be no unacceptable impacts on highway safety.
99. The development is car-free and therefore meets the transport hierarchy of LP saved policy T1 and is within the City Centre with access to a wide range of facilities in the

surrounding area, meeting the requirements of LP saved policy T2. It is within walking/cycling distance of the main university campus meeting LP saved policy T3.

100. The PBSA reception, bike store, and plant rooms all directly abut the pavement of Longbrook Street. This is a busy stretch of road, and it is considered appropriate to place a condition that these doors open inward only and have quick access measures for occupants to prevent any blocking of the flow of pedestrian movements.
101. The level of cycle parking is based upon average use but falls below the SPD recommended levels. The Local Highway Authority raised no objection to this scheme, noting that monitoring of the cycle store was proposed and that there is scope for additional cycle parking to be provided within the site if required. In this instance it is acceptable, with a requirement for monitoring and further spaces if needed.
102. Public comments raised the risk of a high number of delivery vehicles visiting the site. There will be a central reception for deliveries, and the submitted Transport Statement notes that each delivery company will bundle packages together for ease. There is a loading bay on Longbrook Street, opposite the site on for deliveries, and this will be suitable for deliveries and will minimise impacts on the public highway. Following discussions with operators at similar buildings it was found that the delivery companies take notes on delivery requirements for buildings such as this and would advise drivers on the necessity of using the appropriate stopping point.
103. Comments were also submitted in relation to management of student drop-off collections. In line with the previous approval, this would be through a management plan that would be agreed with the Council, in consultation with the Local Highway Authority, to limit the impact of moving in or out on the wider highway network.

Biodiversity

104. LP saved policy LS2 states that development that harms the integrity of a RAMSAR site, Special Protection Area or Special Area of Conservation will not be permitted.
105. LP saved policy LS4 states that development that would harm a site of nature conservation importance or landscape features that are of importance for wild fauna or flora or wildlife corridors will only be permitted with a balanced assessment and suitable mitigation.
106. CP policy CP16 requires protection and enhancement of environmental assets, including the Exe Estuary, East Devon Pebblebed Heaths/East Devon Heaths, and the Dawlish Warren European sites.

107. St James NP policy EN6 states that 'proposals which result in a loss of biodiversity will not normally be permitted' and that appropriate mitigation is required where a direct or indirect adverse impact occurs.
108. The development will be subject to the national mandatory 10% biodiversity gain requirement. There is very limited opportunity to deliver the net gain on site, and it is proposed that off-site habitat units will be purchased. This is an allowed route and has been found acceptable by the Council's ecologist.
109. The submitted Preliminary Ecological Appraisal noted the potential for bat roosting on adjoining buildings and the Council's ecologist required this information to provide a full response. The survey was undertaken and confirmed there were no bats emerging from the potential roosts and that harm to bats is unlikely.
110. The site is within the zone of influence for the Exe Estuary, and an Appropriate Assessment has been undertaken under Habitat Regulation Assessment requirements. This identified recreational impacts on this protected area and that mitigation is required. A strategy is in place that top-slices from Community Infrastructure Levy (CIL) contributions to pay for this. This site is liable for CIL and therefore this route is appropriate.
111. The Council's ecologist raised no objection to the proposal, subject to a condition requiring the mitigation measures set out in the Ecological Impact Assessment to be followed.

Contamination

112. LP saved policy EN2 requires sites where there is contamination or a good reason to believe contamination exists to undertake surveys and remediation if necessary.
113. CS policy CP11 requires development to minimise and if necessary, mitigate against environmental impacts.
114. There is an identified contamination risk on the site and remediation measures have been proposed to deal with them. The Council's Environmental Health team confirmed that the remediation measures are acceptable subject to a condition requiring a verification report to be undertaken and submitted prior to first occupation.
115. A condition is also recommended for handling of any unexpected contamination found during the development.

Air Quality

- 116. LP saved policy EN3 states that development that would harm air quality will not be permitted.
- 117. CS policy CP11 requires development to minimise and if necessary, mitigate against environmental impacts. Within Air Quality Management Areas measures to reduce pollution and meet air quality objectives will be brought forward.
- 118. The site is adjacent to an Air Quality Management Area (AQMA) on Longbrook Street and New North Road. CS policy CP11 requires that proposals minimise and mitigate environmental impacts.
- 119. The proposal is for car-free development and is considered to have a minimal impact on the AQMA. A Travel Plan has been submitted with the proposal and the measures identified within it will promote sustainable transport measures. There is no significant conflict with the policy requirements.

Drainage

- 120. LP saved policy EN3 states that development that would harm water quality will not be permitted.
- 121. LP saved policy EN4 states that development must not increase flooding risks or be at risk from flooding.
- 122. CS policy CP12 requires all development to mitigate against flood risk by using sustainable urban drainage where feasible and practical.
- 123. The site is within Flood Zone 1 and is at low risk of flooding.
- 124. The existing site connects to a combined surface water/foul waste sewer, and it is proposed to do the same for this site. Whilst infiltration or connection to a water source is preferred for surface water drainage it has been demonstrated that this is not possible in this location. The Lead Local Flood Authority raised no objection to this approach, subject to a condition on handling of surface water drainage during construction.

Sustainability

- 125. CS policy CP13 requires new development to connect to existing or proposed Decentralised Energy Networks unless it can be demonstrated that it would not be viable or feasible to do so. In those instances, alternative solutions should be explored and implemented.

126. There is not currently a district heating system in this area; however, there are long-term plans for one. Considering this the development has been designed to allow for a future connection, meeting the requirements of CS policy CP13. A planning obligation has been agreed to help fund the future district heating delivery.

S106 Obligations

127. CS policy CP18 states that new development must be supported by appropriate infrastructure in a timely manner. Developer contributions will be sought where necessary to mitigate adverse impacts to ensure the physical, social, economic, and green infrastructure is in place to deliver acceptable development.
128. The following matters are considered necessary to make the development acceptable in planning terms, to be directly related to the development, and fairly and reasonably related in scale and kind to the development meeting the tests set out in Regulation 122.
129. DCC Highways – Requested £600 per student room for improvements to local cycle networks identified in the Exeter Local Cycling and Walking Improvement Plan. Also requested £5,000 towards any Traffic Regulation Orders required as part of the development.
130. NHS Integrated Care Board – Contribution of £27,667 requested to expand oversubscribed GP surgeries at Barnfield Hill Surgery, Mount Pleasant Health Centre, St Leonards Practice and St Thomas Medical Group – St Thomas Health Centre.
131. Local Energy Network - £19,564 towards the implementation of a Local Energy Network scheme to provide district wide low carbon energy supply in the vicinity of the development.
132. A management plan for operation of the PBSA block to be submitted and approved in advance of first occupation. This will also set out student only restrictions, moving in and out controls and handling of any complaints that arise from the use.
133. The following matters were requested, but are not included within the S106 Agreement:
134. ECC Public and Green Spaces – Requested a contribution towards improvements to local parks. This was found not to meet the planning obligation tests. The extant scheme did not require a contribution in this manner and students have access to a wide range of facilities on the campus sites.

135. The NHS Foundation Trust requested a contribution of £26,842 for acute service provision. This is not accepted in relation to this scheme. This is based on a view that, among other matters, insufficient information has been provided of how this arises as new demand, what such contributions would be spent on, and whether such contributions meet the 'tests' for planning obligations specified in Community Infrastructure Levy Regulation 122(2) and NPPF 2024 section 58.

17.0 Conclusion

The site has a precedent of acceptability established through the existing planning consents for a similar height building and number of PBSA bedrooms. In comparison to previous approvals this scheme moves the building away from the rear of the site and will see preservation of the medieval wall.

The proposal has been through pre-application and DRP and the applicant has worked positively with the Council through both pre-application and application stages.

There is a continued, evidenced, demand for PBSA within the city and the city centre is identified as a suitable location in policy. Whilst there are other PBSA blocks in the surrounding area, this is to be expected within a policy identified PBSA location and there are a range of other dwellings in the vicinity. It is therefore not considered to create an overconcentration or imbalance of PBSA.

The massing has been increased in response to fire safety requirements; however, this is considered to give the opportunity for improvements on the previously approved scheme and has allowed for a stronger northern elevation facing Longbrook Street. The materials palette has been refined, with horizontal aspects linking better with the neighbouring John Lewis building and the introduction of a ground floor plinth.

Occupant amenity is considered acceptable, with two amenity areas and rooms of a comparable size to other PBSA blocks within the city. In line with other PBSA blocks it is accepted that the range of facilities available at the university campus will mitigate for this. There is no significant neighbour amenity impact identified, and the development would be subject to a management plan as well as conditions relating to noise levels from plant. The proposal will be car-free development and suitable cycle storage has been provided, alongside a Travel Plan to promote sustainable transport.

Having regard to the presumption in favour of sustainable development in paragraph 11 of the NPPF, and the specific need to deliver well-managed, purpose-built student accommodation in accessible city centre locations, the proposal is considered acceptable in principle. The scheme delivers a high-density form of development that responds to its context, is appropriately scaled, and includes sufficient mitigation to address potential amenity and management concerns. Subject to the planning

conditions set out at the end of this report and the completion of a S106 agreement to secure a student management plan, local energy network, transport and GP surgery contributions, the development is recommended for approval.

18.0 Recommendation

Dual recommendation to APPROVE subject to conditions and a S106 Legal Agreement, or REFUSE if that Legal Agreement is not finalised in timely manner

- a) DELEGATE TO THE SERVICE LEAD (CITY DEVELOPMENT) TO GRANT PERMISSION SUBJECT TO THE COMPLETION OF A LEGAL AGREEMENT UNDER SECTION 106 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) TO SECURE THE FOLLOWING:
- £600 per student room to Devon County Council for improvements to local cycle networks
 - £5,000 to Devon County Council for costs relating to Traffic Regulation Orders required as part of the development.
 - £27,667 for expansions of GP surgeries.
 - £19,564 to Exeter City Council for implementation of a Local Energy Network.
 - Management Plan agreed with Exeter City Council.

And the following conditions:

Time Limit for Commencement

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which this permission is granted.

Reason: To ensure compliance with sections 91 and 92 of the Town and Country Planning Act 1990.

Condition: Approved Plans

The development hereby permitted shall not be carried out otherwise than in strict accordance with the following submitted details received by the Local Planning Authority as modified by other conditions of this consent:

- EXE-RMI-PL-XX-DR-A-PL103- Proposed Site Plan
- 1565 EXE-RMI-PL-ZZ-DR-A-PL110B - Ground Floor Plan
- EXE-RMI-PL-XX-DR-A-PL111-First Floor Plan
- EXE-RMI-PL-XX-DR-A-PL112-Second to Fifth Floor Plan
- EXE-RMI-PL-XX-DR-A-PL113-Sixth to Seventh Floor Plan
- EXE-RMI-PL-XX-DR-A-PL114A-Eighth Floor Plan
- 1565 EXE-RMI-PL-ZZ-DR-A-PL115A - Roof Plan
- EXE-RMI-PL-ZZ-DR-A-PL301A-Proposed Section AA
- 1565 EXE-RMI-PL-ZZ-DR-A-PL201A - West Elevation
- 1565 EXE-RMI-PL-ZZ-DR-A-PL202A - South Elevation
- 1565 EXE-RMI-PL-ZZ-DR-A-PL203A - East Elevation

- 1565 EXE-RMI-PL-ZZ-DR-A-PL204A - North Elevation
- 1565-EXE-RMI-PL-ZZ-DR-A-Proposed Landscaping Rev A

Reason: To ensure compliance with the approved drawings.

Condition: Biodiversity Net Gain

Pre-commencement

In relation to statutory obligations on Biodiversity Net Gain (see Informative 3), a Biodiversity Gain Plan shall be prepared in accordance with the details set out in Section 5 of the submitted Ecological Impact Assessment (dated 27 May 2025) and Statutory Biodiversity Metric.

The development shall thereafter be carried out in accordance with a Biodiversity Gain Plan that has been submitted to, and approved by, the Local Planning Authority. The development shall not be brought into first use until the commitments in the Biodiversity Gain Plan have been undertaken and a report has been submitted to, and approved by, the Local Planning Authority demonstrating this to be the case.

Reason for pre-commencement condition: To ensure the development delivers a Biodiversity Net Gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 and will be maintained for a period of 30 years

Condition: Heritage Management Plan

Pre-commencement

No development related works shall take place within the site until a Heritage Management Plan has been submitted to and approved in writing by the Local Planning Authority.

The Plan shall include the following items:

1. Archaeological Watching Brief for all areas not assessed by the submitted document Results of an Archaeological Trench Evaluation (ACD2826/3/0 Version 1, dated 29 November 2024).
2. Conservation and recording for the medieval wall to the east of the site.
3. Program of monitoring of the Underground Tunnels Scheduled Ancient Monument to the south of the site. This shall include measures to monitor vibration impacts and methodology for handling of abnormal readings, including cessation of work, reporting to the Local Planning Authority and measures for remediation/mitigation.

The submission details for parts 1 and 2 shall include on site work, and off-site work such as the analysis, publication, and archiving of the results, together with a timetable for completion of each element.

Reason: To ensure that an appropriate protection or recording is made of archaeological evidence that may be affected by the development, in accordance with saved Policies C3 and C5 of the Local Plan First Review and paragraph 218 of the National Planning Policy Framework (2024).

These details are required pre-commencement as specified to ensure that the suitable heritage works are agreed and implemented prior to any preparatory and/or construction works that may impact them.

Construction Environmental Management Plan

Pre-commencement

No development (including ground works) or vegetation clearance works shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The Statement shall describe the actions that will be taken to protect the amenity of the locality, especially for people living and/or working nearby. It shall include as a minimum provision for:

- a) Construction working hours and deliveries from 8:00 to 18:00 Monday to Friday, 8:00 to 13:00 on Saturdays and at no time on Sundays or Bank Holidays.
- b) A noise and vibration management plan, including details of quantitative monitoring of noise and/or vibration to be conducted if deemed necessary by the LPA following justified complaints.
- c) All plant and equipment based at the site to use white noise reversing alarms or a banksman unless agreed otherwise in writing in the CEMP.
- d) No driven piling without prior consent from the LPA.
- e) A detailed proactive and reactive dust management plan, including details of quantitative monitoring of dust emissions.
- f) No emissions of dust beyond the site boundary so as to cause harm to amenity of the locality.
- g) No burning on site during construction or site preparation works.
- h) All non-road mobile machinery (NRMM) based at the site shall be of at least stage IIIB emission standard (or higher if stage IIB has not been defined for the type of machinery) unless agreed otherwise in writing in the CEMP.
- i) The site access point(s) of all vehicles to the site during the construction phase.
- j) The areas for loading and unloading plant and materials.
- k) The location of the site compound and details of how power will be provided to the compound (use of a generator overnight will not normally be considered acceptable).
- l) The location of storage areas for plant and materials. This should include the location of stockpiles of topsoil and sub soil.
- m) The erection and maintenance of securing hoarding, if appropriate. (Hoarding is to be kept free of fly posting and graffiti).
- n) Arrangements for communication and liaison with residents, including regular letter drops and a dedicated contact number for complaints.

The approved Statement shall be strictly adhered to throughout the construction period of the development.

Reason: In the interest of the environment of the site and surrounding areas. This information is required before development commences to ensure that the impacts of the development works are properly considered and addressed at the earliest possible stage.

Noise

Pre-commencement

Prior to commencement of any construction of the building hereby approved an Acoustic Insulation Implementation and Verification Plan shall be submitted and approved in writing by the Local Planning Authority. This plan shall include details of the insulation to be installed and describe how the installation shall be tested so as to demonstrate the achievement of suitable internal noise and thermal comfort levels.

Prior to the occupation of the building hereby approved an Acoustic Installation Verification Report shall be submitted. This report shall document the successful completion of the acoustic insulation work and post-installation testing.

Reason: To protect the amenity of the locality, especially for people living and/or working

nearby. This is required prior to commencement to ensure the required measures are included within the construction of the structure.

Construction Drainage

Pre-commencement

No part of the development hereby permitted shall be commenced until the detailed design of the proposed surface water drainage management system which will serve the development site for the full period of its construction has been submitted to, and approved in writing by, the Local Planning Authority in consultation with Devon County Council as the Lead Local Flood Authority. This temporary surface water drainage management system must satisfactorily address both the rates, volumes, and quality, of the surface water runoff from the construction site.

Reason: To ensure that surface water runoff from the construction site is appropriately managed so as to not increase the flood risk, or pose water quality issues, to the surrounding area.

This is required prior to commencement to ensure suitable measures are in place during the construction phase.

Construction Management Plan

Pre-commencement

Prior to commencement of the development hereby approved a Construction Management Plan (CMP) shall be submitted to, and be approved in writing by, the Local Planning Authority. The CMP shall include the following information:

- (a) the timetable of the works;
- (b) daily hours of construction;
- (c) any road closure;
- (d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;

- (e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;
- (g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;
- (h) hours during which no construction traffic will be present at the site;
- (i) the means of enclosure of the site during construction works; and
- (j) details of proposals to promote car sharing amongst construction staff to limit construction staff vehicles parking off-site
- (k) details of wheel washing facilities and obligations
- (l) The proposed route of all construction traffic exceeding 7.5 tonnes.
- (m) Details of the amount and location of construction worker parking.
- (n) Photographic evidence of the condition of adjacent public highway prior to commencement of any work;

CCTV

Pre-above Ground Works

Prior to any above ground works, details of any CCTV coverage shall be submitted to, and be approved in writing by, the Local Planning Authority.

The submitted details shall include the design of the CCTV cameras, locations and identified coverage areas that include the PBSA entrance and exit points, reception area, bin and bike stores, stairwells, landings and the café entrance, bin store, and the external area to the south.

Reason: In the interest of crime prevention and to improve the safety of occupants and visitors to the site.

Materials

Pre-external materials

Prior to any external finishes being installed details of all external facing materials shall be submitted to and approved by the Local Planning Authority. The materials used in the construction of the development shall correspond with the approved details.

Reason: To ensure that the materials conform with the visual amenity requirements of the area.

Plant Noise

Pre-installation

Prior to the installation of any new plant on the site, details of the plant (Including extraction, ASHPs and MVHR equipment) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include location, design (including any compound), and noise specification. The plant shall not exceed a maximum sound level of 5dB below the 'contextual' calculated noise level (53dB) as set out in Table 3 of the submitted Plant Noise Assessment Ref: 11193B/GK.

If the plant exceeds this level, mitigation measures shall be provided to achieve this in accordance with details to be submitted to and approved in writing by the Local Planning Authority. (All measurements shall be made in accordance with BS 4142:2014).

Cycle Parking

Pre-occupation

The development hereby permitted must not be occupied or utilised until a scheme showing precise details of the proposed cycle parking facilities for at least 34 bicycles is submitted to the Local Planning Authority. Any such scheme requires approval to be obtained in writing from the Local Planning Authority and must be constructed before the development is occupied and, thereafter, must be maintained, kept free from obstruction and available for the purpose specified.

Reason: To ensure suitable sustainable transport facilities are provided for occupants.

Travel Plan

Pre-occupation

The submitted Travel Plan (1232-TP Rev v1 – dated 11 March 2025) shall be brought into use at first occupation of the development hereby approved and operated in accordance with the document at all times thereafter.

Reason: To promote sustainable transport opportunities for occupants of this car-free development.

Birds

Pre-occupation

Prior to occupation of any dwelling hereby approved, details of provision for nesting swifts shall be submitted to and approved in writing by the Local Planning Authority in consultation with the RSPB. Upon written approval of the details, the scheme shall be fully implemented as part of the development and retained thereafter.

Reason: In the interests of preservation and enhancement of biodiversity in the locality.

Café impacts

Pre-occupation

Before the Class E(b) unit hereby approved opens, details of equipment to control the emission of fumes and smell from the shall be submitted to, and approved in writing by, the Local Planning Authority.

The approved details shall be implemented as agreed and operated and always maintained thereafter in accordance with the manufacturer's instructions.

Reason: To protect the amenity of nearby occupants.

Rear Gate and Bin Stores

Pre-occupation

Prior to first occupation or use of the development hereby approved the lockable gate shown on the approved ground floor plan shall be installed and locks installed on the outer doors of both the commercial and residential bin stores. The locks shall always remain in situ thereafter.

Reason: To prevent fly tipping and unauthorised access to areas of the building.

External Landscaping

Pre-occupation

Prior to first occupation or use of the development hereby approved details of external area to the south-east of the development site shall be submitted to, and be approved, in writing by the Local Planning Authority.

The details shall be based on the submitted drawing 1565-ROK-00-DR-A-Proposed Landscaping Block Plan (dated 07 August 2025) and include materials, planting types, and maintenance.

Reason: To provide external amenity improvements for both occupants and public as well as visual improvements to the site.

Contaminated Land

The development shall be remediated in accordance with the details set out in Section 9.0 of the submitted Contaminated Land Ground Investigation, Risk Assessment and Validation Report (18327/GI/R1 – Dated 18 May 2023).

Prior to first occupation or use of the development a verification report confirming that no unacceptable risk remains shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure appropriate protection measures are taken during construction and for future occupants/users of the development.

Unexpected Contamination

If, during development, contamination posing unacceptable risks is found, which has not been identified in the site investigation, additional measures for the remediation of this shall be submitted to and approved in writing by the Local Planning Authority. The remediation of the site shall incorporate the approved additional measures, and a verification report shall be submitted to and approved by the Local Planning Authority before any part of the development is occupied.

Reason: To ensure appropriate protection from risks during construction and for future occupants/users of the development.

Ground Floor Doors

All ground floor doors shall always be inward opening only and the PBSA bike store lock shall be key fob accessible.

Reason: To prevent blocking of the adjoining public highway.

Drainage

The surface water drainage system shall be installed in accordance with the proposals set out in the submitted Foul and Surface Water Drainage Strategy P0050-FE-XX-XX-RP-C-0001 (dated 07 May 2025).

Reason: To ensure suitable drainage is provided on-site to reduce flooding risk.

Ecology

The development shall be undertaken in accordance with the mitigation measures set out in Section 4 of the submitted Ecological Impact Assessment (Rev 1, dated 27 May 2025) at all times.

Reason: To ensure suitable protection and mitigation for ecological and biodiversity features.

District Heating

The residential accommodation shall be constructed with centralised space heating and hot water systems that have been designed and constructed to be compatible with a low temperature hot water District Heating Network in accordance with the CIBSE guidance "Heat Networks: Code of Practice for the UK". The layout of the plant room, showing provision for heat exchangers and for connection to a District Heating Network in the Highway shall be submitted to and approved in writing by the Local Planning Authority and the approved details shall be implemented on site unless otherwise agreed in writing.

Reason: To ensure that the proposal complies with Policy CP14 of Council's Adopted Core Strategy and in the interests of delivering sustainable development

Informative: Highway Works

A suitable legal agreement or licence with the Highway Authority to secure the construction of the highway works necessary as part of this development. It is recommended to contact Devon County Council Highways as early as possible to secure this prior to commencement of development.

Should the approved works impact upon any existing services and utility apparatus that requires them to be diverted, lowered, or protected then the works themselves will have to meet the requirements of both the relevant Statutory Undertaker and the Highway Authority. Drawings will need to be provided at the detailed Highway design stage showing the location and depth of all public and private services affected by the works. No works will be allowed to commence until such a time as the Highway Authority are satisfied that all necessary works have been secured.

Informative: CCTV

The following advice is given in respect of any CCTV installed:

- A Passport for Compliance Document, including an Operational Requirement (OR) should be drawn up prior to installation to ensure any system will be fit for purpose.
- Cameras, wiring and recording or monitoring equipment should be secured.
- CCTV should be designed in co-ordination with external lighting and landscaping.
- The CCTV must have a recording format that is acceptable to the Police.
- Recorded images must be of evidential quality if intended for prosecution.
- Any CCTV is advised to be installed to BS EN 50132-7: CCTV surveillance systems for use in security applications.
- CCTV systems may have to be registered with the Information Commissioners Office (ICO) and be compliant with guidelines in respect to Data Protection and Human Rights legislation. Further information is available via www.ico.gov.uk

For guidance on the use of CCTV images as legal evidence see also BS 7958:2005 CCTV Management and Operation Code of Practice.

Informative: Biodiversity Net Gain

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that this planning permission is subject to the condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan in respect of this permission, is Exeter City Council.

The Biodiversity Gain Plan must include:

- (a) information about the steps taken, or to be taken, to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- (b) the pre-development biodiversity value of the onsite habitat;
- (c) the post-development biodiversity value of the onsite habitat;
- (d) any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- (e) any biodiversity credits purchased for the development; and
- (f) any such other matters as the Secretary of State may by regulations specify.

- b) REFUSE PERMISSION FOR THE REASONS SET OUT BELOW IF THE LEGAL AGREEMENT UNDER SECTION 106 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) IS NOT COMPLETED BY 08 MARCH 2026 OR SUCH EXTENDED TIME AS AGREED IN WRITING BY THE SERVICE LEAD (CITY DEVELOPMENT)