

Planning Committee Report 25/0098/FUL and 25/0099/LBC

1.0 Application information

Number:	25/0098/FUL and 25/0099/LBC
Applicant Name:	Roger Ball, University of Exeter
Proposal:	Partial demolition of the existing garden walls and workshops and construction of a part two, part three storey educational building for teaching and research use and associated landscaping, including temporary enabling works (revised).
Site Address:	Former Walled Garden Adjacent To Reed Mews Mardon Hill Exeter
Registration Date:	29 January 2025
Link to Applications:	25/0098/FUL 25/0099/LBC
Case Officer:	John Douglass
Ward Member(s):	Cllr Kevin Mitchell, Cllr Michael Mitchell, Cllr Tammy Palmer

REASON APPLICATIONS ARE GOING TO COMMITTEE

The Head of City Development considers the applications to be significant applications that should be determined by the Planning Committee in accordance with the Exeter City Council Constitution.

2.0 Summary of recommendation

GRANT permission subject to conditions as set out in report.

3.0 Reason for the recommendation:

Following significant revisions to the design of the proposals, and taking into account the public benefits of the proposal itself, together with a package of environmental benefits to the adjacent buildings and gardens, the less than substantial harm to heritage significance that will arise from the proposals is considered justified and outweighed by public benefits. As such, approval is recommended subject to a suite of conditions, many of which are considered essential to mitigate heritage harm and secure the public benefits that will outweigh it.

4.0 Table of key planning issues

Issue	Conclusion
Principle of Development	Whilst the University of Exeter Streatham Campus SPD envisages small scale development 'of exceptional quality' in this area, the proposed development is considered acceptable taking into account the public benefits it will deliver and the improvements to the design.
Economic and Social Benefits	Significant benefits to University, city and region are envisaged.
Access and Transport Considerations	No objections raised. The primary issues relate to pedestrian access into and across this site given that it lies at a nodal point on the campus and will experience even greater footfall once the West Park development is constructed and occupied. The new N-S route across the 'park/garden' will deliver significant accessibility benefits.
Design and Impacts on Heritage and Landscape	While some listed buildings and fabric will be lost, the Conservation Officer considers the overall harm to heritage assets to be 'less than substantial' and well below 'substantial' in accordance with the NPPF tests. The public benefits of the scheme are considered to outweigh the level of harm caused. Conditions are needed to secure detailed recording before loss, to ensure that demolition is only in association with redevelopment as proposed, and to secure the reuse of reclaimed materials in the redevelopment as proposed.
Impacts on Trees, Ecology and Biodiversity Net Gain	Impacts on trees and protected species are acceptable given that a compensatory bat roost has already been consented and constructed. BNG is predominantly off-site but this is acceptable given the other site constraints faced by the development. Delivery and maintenance of on-site BNG is to be secured by condition.

Issue	Conclusion
Sustainability	Subject to conditions the development will be highly sustainable. It will secure Passivhaus accreditation, be 'Net Zero Ready' and will be compatible with the District Heat Network.
Amenity Impacts	Subject to a condition to control noise from roof mounted plant, no objections are raised.
Heritage and Planning Balance	Reflecting the economic and social benefits that the building is expected to bring alongside a package of environmental works to the listed gardens and adjacent buildings, the harm to heritage significance is considered outweighed by public benefits (NPPF 215). As the proposal is acceptable in other respects, approval is recommended subject to conditions.

5.0 Description of site

The site is a walled, terraced garden with brick boundary and retaining walls. It occupies land that slopes relatively steeply from north to south and west to east. It forms part of the curtilage of the adjacent Reed Hall and as such is Grade II Listed. The site was historically the productive garden of Reed Hall (which was known as Streatham Hall until it was gifted to the University by Alderman Reed in 1922 and renamed in his honour). The Heritage assessment points out that some of the structures around the site (particularly the former productive walled garden that adjoins the site to its east) date from the late 18th Century Duryard Lodge which was replaced by Streatham Hall after its sale in 1866/67. During the subsequent development of the Streatham Hall estate, an arboretum and Italianate ornamental gardens surrounding the mansion were laid out by Robert Veitch of Veitch Nurseries, who were famous for their pioneering work in horticulture and plant hunting during the 19th and early 20th centuries, and introduced hundreds of new plant species to Europe.

The site is currently identified as the Diamond Jubilee International Garden, with information boards and landscaping carried out in 2016 referencing its history. It retains brick potting sheds, evidence of former glasshouse bases and pipework, with cobbled paths between them, and an arched vault beneath the garden (including an iron furnace) which would have served as a boiler room for the glasshouses (of which there were at least 6). Whilst much of the site appears to have been laid out from 1866, it seems likely that it extended the technological approach of heated

glasshouses started in the gardens to the pre-existing Duryard Lodge by its owner Samuel Kingdon. "Iron Sam Kingdon" was a prominent local businessman and former Mayor of Exeter whose iron works specialised in the design and fabrication of glasshouse heating systems, including boilers and pipework. There is circumstantial evidence that Kingdon's firm may have designed and installed the glasshouse heating systems for the new mansion and garden after his death.

The site abuts Mardon Hill to the north, with Mardon and Holland Halls beyond, and the Institute of Arab and Islamic Studies (IAIS) building to the north east. Retained historic brick potting sheds adjoin Mardon Hill along the full extent of the northern boundary. Two of these buildings are accessible from Mardon Hill. The third sits below Mardon Hill as it climbs up to the level of the IAIS building. The potting sheds have been used as Theatre workshop buildings but are no longer in use, but a more modern building (c.1946) built against the potting sheds within the gardens continues to be in use as such. The third potting shed is accessed from within the garden via a passage between the Theatre Workshop building and the IAIS retaining wall.

The north eastern boundary of the site comprises of a historic brick retaining wall of 5.5-6m high (plus balustrade), above which there is a terraced area serving as one of the entrances to the IAIS building.

Land to the east, south and west is all part of the Reed Hall historic curtilage. To the east the former productive garden dating from Duryard Lodge adjoins the site. This land currently serves as a small 'park' through which a key pedestrian route identified as a 'Lit Path' passes. A significant number of specimen trees of various species, size and maturity have colonised this area giving it a more informal/romantic character more closely aligned with that of the wider historic arboretum than that of its historic use as a working productive garden. The historic enclosing walls to its north and east are retained, along with the retaining walls to the terracing to the west but the southern boundary wall has been removed such that there is no longer any demarcation between the former walled productive garden and the rest of the Italianate gardens. The Lit Path drops down into the site via historic terraces, and since the closure of steps leading down into the Mews, passes through the site exiting to Mardon Hill via a small covered passage between the potting sheds.

South of the site, the land sits much lower at the level of Reed Hall. Immediately south is a courtyard serving an unsympathetic 1970s extension to Reed Hall, in which the catering functions for conferences and events held at Reed Hall are accommodated. With the exception of the historic walls (stone with brick above) retaining the application site and gardens, and the Mews buildings that enclose it to its north side, this part of Reed Hall retains little historic character. The surface is finished in tarmac and provides servicing and car parking for the building.

The area that adjoins the site to its west is much more sensitive in historic terms. It comprises of former stable and servicing buildings known as Reed Mews, which are

used as a Health and Wellbeing facility for the University. Although their composition is simple, and their design more utilitarian than that of Reed Hall, the two facing mews buildings and their enclosing walls form an attractive cobbled courtyard. The eastern wall to their courtyard retains the application site at its western boundary. Two heritage fig trees climbing the retaining wall add to the historic character, as does a historic flight of steps that lead up to Lit Path via the application site, albeit that these are currently closed for safety reasons. There is also a pedestrian access to the vault beneath the site. A further, more generous, access to the vault is via the lightwell between Mardon Hill and the north of the Mews buildings. A view into the vault is available from Mardon Hill, and it is notable that a number of utilitarian pieces of plant (A/C condenser units) and a portacabin have been added to this area.

The site is known to accommodate a number of roosting bats that were found to be using the vaults and all of the potting sheds alongside Mardon Hill. A replacement compensatory bat roost is already under construction on land to the north (see planning history).

The biggest physical constraint to development of the site is its topography, which makes access challenging (Mardon Hill for example is 1:6). Heritage is the most significant policy constraint: as well as being within the curtilage of the Grade II listed Reed Hall, the grounds are within gardens on the Devon Gardens Trust local list (<https://www.devongardenstrust.org.uk/gardens/reed-hall-streatham-hall>) and as such are a locally designated Park & Garden (there are two entries for the University and the site is within both: Reed Hall gardens and also the University's Streatham campus as a whole). The site is relatively unconstrained in other respects. It is not at risk of flooding from fluvial or surface water sources, but is within a Site Of Local Importance For Nature Conservation subject to saved Policy L4 of the adopted Local Plan.

6.0 Description of development

The proposal is to construct a new teaching and research building on the site. The vision is for the scheme to be a world class learning and research facility that enhances the Institute of Arab & Islamic Studies (IAIS) and directly supports the delivery of the University's 'Strategy 2030'. The close links with the IAIS, which occupies a dedicated building immediately adjacent to the site to its north east, are a key driver for the construction of the building in this specific location.

The Design and Access Statement states that 'The scheme will act as a hub for intellectual engagement; facilitating scholarly research, helping to refine public discussion, and offering programmes for post-graduate study. It will provide a focal point for Exeter's community of talented and creative minds whose activities, partnerships and ways of working will create unique synergies that keep Exeter at the forefront of future advances. By engaging in global dialogues that shape the trajectory of worldwide development, this initiative will play a pivotal role in nurturing the next generation of distinguished graduates.'

The Overarching Project Theme (Academic Vision) is 'Sustainable Development Goals in the Global South'. It will be a Tri-faculty building supporting the Humanities, Arts and Social Sciences (HASS), Environment, Science and Economy (ESE), and Health and Life Sciences (HLS) faculties, with strong links to HASS due to the relationship with the neighbouring IAIS building. The Academic Vision covers the three Thematic Areas of: i/ Environmental & Climate Management, ii/ International Studies & Global Governance, and iii/ Global Development & Health and IAIS is cited as a Key Focus Area: 'A unique part of our vision will be the bringing together of various groups of the Institute of Arab and Islamic Studies to extend the dimensions of research into a consideration of the human consequences and policy implications of these challenges. This will bring a unique fusion and broaden the potential impact of our research in a way that we believe will make us a global leader.'

In order to construct a building in this location, existing buildings and structures must be demolished. Whilst utilitarian in nature, these buildings are all curtilage listed at Grade II as the majority were historically part of the productive garden of Streatham (now Reed) Hall.

Limited pre application discussions with the applicant did take place prior to the application but unfortunately the university were unable to undertake a full pre-application enquiry due to programme constraints and instead proceeded to the submission of a fully detailed application in January 2025. Following detailed assessment, officers advised in June 2025 that they were unable to support the submitted proposal due to its impacts on the adjacent listed buildings. However officers are mindful of the importance of the scheme to the University and of its wider economic benefits, and for this reason an officer team comprising Planning, Urban Design & Landscape, and Conservation Officers have supported the University through an intensive redesign programme over the course of the summer. The redesign coincided with the University appointing a new architect and contractor team to finalise the design at RIBA Stage 4 and deliver the building. Consequently, the officer team were able to negotiate improvements to the scheme while a degree of rationalisation was already being undertaken. A second review by the Exeter (Design West) Design Review Panel was also carried out before the scheme was comprehensively resubmitted on 11 September 2025.

The principal aspects of the redesign were a reduction in the footprint of the building (by 19%) to step it back further from the Reed Mews courtyard and from Reed Hall itself (see comparison images in presentation). Taken alongside the reduced excavation proposed (towards the IAIS building), this reduced the proposed floor area by 27% at level 00 and 13% at level 01. The revised scheme will now provide around 1750sq m compared to the 2000sq m previously proposed. The exposed concrete frame and Pergolas were also removed from level 02 to reduce the perceived scale and mass of the building. The overall height was also reduced by 1.3m and raising of the lowest level by 0.95m reduced the potential impacts on the

retained historic vault beneath. The elevational treatment and materials were also significantly revised to reduce the amount of concrete proposed and instead introduce historic brick reclaimed from demolished structures around the level 00 'plinth', with new brickwork in similar tones set within concrete frames within the pre-cast panels above to echo the architectural approach of Reed Hall.

The proposed building will provide accommodation at three different levels, plus plant space within an enclosure at roof level. As the building is sited on very steeply sloping land, two of its floors could be described as 'ground floor'. Hence the floor levels are referred to as 00, 01, 02 and roof. The building will have several entrances: the primary entrances being those from Mardon Hill at level 00 and from IAIS at level 02 (where the building will be entered via a colonnaded route aligned with the glazed facade of the IAIS building). Although the central entrance from Mardon Hill at level 01 leads directly onto the stairwell, it is intended primarily for servicing purposes and is therefore downplayed in design terms. The building can also be entered from the south at level 01 via an outdoor terrace accessed by climbing up a flight of steps from the landscaped garden at level 00. The only car parking proposed is a single disabled space which is being created to the north of the IAIS building such that users could access the building from the level 02 entrance without having to use the very steep (1:6) Mardon Hill. Cycle parking stands are also proposed in this area (4 stands providing 8 spaces), as well as between the Mardon Hill entrance and the social spaces adjacent the Mews Courtyard (3 stands providing 6 spaces).

The accommodation is summarised by floor as follows:

Level 00 (reduced footprint to minimise the excavation required): Air handling and plant room; small teaching area; large teaching area; breakout study area (also serving as a central circulation space); toilets; storage and access to stairwell.

Level 01: Large shared office workspace and breakout space, with access to 3x project/meeting rooms; large teaching area; breakout study area (also serving as a central circulation space); meeting room; toilets; storage/IT/LV rooms and access to stairwell.

Level 02: Café with outdoor terrace; large teaching area; breakout study area (also serving as a central circulation space); toilets.

Roof: Stairwell access; enclosed plant area; large rooflight; solar PV enclosed by a guardrail; and a green roof.

The landscaping scheme has also been significantly redesigned during the application. Setting back the southern wing away from Reed Hall has allowed for a more generous outdoor 'Courtyard Garden', in which reclaimed materials are to be

combined with new to create a formal quadrilateral garden inspired by the traditions of both Persian and Italianate gardens. It features a central water feature surrounded by four seating spaces, and will link to the existing 'lit path' via the existing steps. The courtyard will also lead up to the Level 01 terrace, which is effectively a remnant of the existing courtyard garden that is visible from the IAIS terrace, albeit that the ground level is to be increased. Users of the large teaching area and shared office workspaces at level 01 will be able to spill out directly into this space, and it will also include an informal link to the grassed area of the adjacent former productive garden (which slopes quite steeply at this point). To the west of the building, the Courtyard Garden will link to Mardon Hill via a level route incorporating social/breakout spaces against the retaining wall that rises from the Mews Courtyard. This route will enable the current 'lit path' route (which is heavily used as a route between West Park accommodation and the centre of the campus) to be maintained, and will also permit views towards Reed Hall from Mardon Hill.

Another important objective being addressed by the scheme is the provision of an accessible route from the heart of the campus to its north western part (including Mardon and Holland Halls and the c1700 new bedspaces now under construction as part of the West Park development). A new accessible path (max 1:21) is proposed from the IAIS terrace (via an existing gap in the historic wall), through the former productive garden to join the lit path closer to The Queens Drive.

To align with the University's own sustainability standards, the building is being designed to target Passivhaus certification (a globally recognised and rigorous standard for high energy efficiency, indoor air quality and comfort) and will utilise low embodied carbon materials and off-site construction methods where feasible.

10% Bio-diversity net gain is proposed, but due to the site constraints the majority of this is proposed off-site.

7.0 Supporting information provided by applicant

The application is supported by a comprehensive suite of documentation. The majority of this remains relevant despite the significant redesign. The agent sought to clarify the supporting information of relevance when submitting the revised scheme: the document entitled 'Guide to use of existing supporting documents in assessing revised proposal' clarifies which existing documents remain relevant, which are superseded/replaced, and which are subject to addenda. The package of relevant supporting documentation is therefore now as follows:

- 28/01/2025_Covering Letter - January 2025
- 28/01/2025_Planning Statement - January 2025, supplemented by:
- 11/09/2025_Covering Letter & Planning Statement Addendum - September 2025.pdf
- 28/01/2025_Design and Access Statement - Part 1 of 5 - Intro
- 28/01/2025_Design and Access Statement - Part 2 of 5 - Site and Context

- (DAS parts 3-5 remain of some relevance as background documents but primarily describe a superseded proposal)
- 11/09/2025_Design and Access Statement Addendum Report - Part 1 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 2 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 12/09/2025_Design and Access Statement Addendum Report - Part 3 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 4 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 5 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 6 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 7 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Design and Access Statement Addendum Report - Part 8 of 8_123442-ATRL-01-XX-RP-A-080010.pdf
- 11/09/2025_Archaeological Assessment & Heritage Statement_September 2025.pdf
- 11/09/2025_AQB Public Benefits Statement_v1.7 11.09.25.pdf
- 09/10/2025_Heritage Enhancement Strategy (Further Public Benefits).pdf
- 28/01/2025_Sustainability Statement RP-O-000021, supplemented by:
- 11/09/2025_Sustainability Statement_Stage_3_Addendum_123442-ATRL-01-XX-RP-PH-010002_P03.pdf
- 11/09/2025_123442-CUR-XX-XX-RP-C-92001-P02- SUSTAINABLE DRAINAGE STATEMENT - Part 1 of 2.pdf
- 11/09/2025_123442-CUR-XX-XX-RP-C-92001-P02- SUSTAINABLE DRAINAGE STATEMENT - Part 2 of 2.pdf
- 11/09/2025_123442-CUR-XX-XX-RP-C-92002-P01- OUTFALL APPRAISAL TECHNOTE (full).pdf
- 11/09/2025_DTS23.12039.5.AIA_Arboricultural Impact Assessment.pdf
- 11/09/2025_DTS23.12039.5.AMS_Arboricultural Method Statement.pdf
- 11/09/2025_DTS23.12039.5.TPP-2 Rev 4_Tree Protection Plan.pdf
- 11/09/2025_DTS23.12039.5.TPP Rev 5_Tree Protection Plan.pdf
- 19/09/2025_DTS24.14748.1.SCH - Schedule of (Tree) works
- 28/01/2025_RP-O-000004 Transport Statement
- 28/01/2025_RP-O-000004 Transport Statement Appendix A
- 28/01/2025_RP-OA-000002 Noise Impact Statement
- 28/01/2025_Geotechnical and Geo-Environmental Desk Study
- 28/01/2025_Geotechnical and Geo-Environmental Desk Study Appendix A
- 28/01/2025_Ground Investigation Report
- 28/01/2025_Land Stability and Ground Movement Assessment Report
- 28/01/2025_RP-O-000002 Air Quality Assessment

- 11/09/2025_123442-CUR-01-XX-CA-C-92001_Surface Water Drainage Calculations_P01.pdf
- 11/09/2025_123442-CUR-01-XX-CA-C-92002_Foul Water Drainage Calculations_P01.pdf
- 12/09/2025_2374-BNG1-AM-Biodiversity Net Gain Statement and Assessment.pdf
- 12/09/2025_2374-SM1-AM-The_Statutory_Biodiversity_Metric_Calculation_Tool_-_Macro_enabled_tool_AI Qasimi-10092025.xlsm
- 12/09/2025_2374-SM1-AM-The_Statutory_Biodiversity_Metric_Calculation_Tool_-_workbook_AI Qasimi-10092025.xlsx
- 12/09/2025_2374_EclA1_AM_Ecological Impact Assessment.pdf
- 03/10/2025_Reed Hall Gardens - Accessible Path (Post Planning Amendments)
- 23/10/2025_Agent Email with Clarifications (including future District Heat Connection)
- 30/10/2025_Academic Research Building Presentation M S-N 20_06_25

8.0 Relevant planning history

Wooded land to the north of the IAIS building:

Reference	Proposal	Decision	Decision Date
24/1485/FUL	Construction of standalone bat roost.	Permitted	03.02.2025

Land to the north west of the site (generally referred to as 'West Park')

Reference	Proposal	Decision	Decision Date
20/1684/OUT	Outline planning application to build student accommodation and ancillary amenity facilities (up to a maximum of 49,821 sq. metres) and external alterations and refurbishment of Birks Grange Village Blocks A-E; with associated infrastructure, demolition of existing buildings and landscaping (All Matters Reserved).	Permitted	17.09.2021
24/0184/VOC	Approval of reserved matters of access, appearance, landscaping, layout and scale in relation to outline permission 20/1684/OUT for student accommodation and ancillary amenity facilities, and external alterations and refurbishment of Birks Grange Village	Permitted	21.05.2024

	Blocks A-E, with associated infrastructure, demolition of existing buildings and landscaping (Variation of conditions 1 (approved plans) and 9 (landscape plans) of 22/1746/RES to introduce a phasing plan, to reduce shop area, increase bedspaces by 21no., reduce building height and associated amendments to Block CB and curtilage, and to remove lower ground floor of Block LP and other external changes including installation of external lift for wheelchair users).		
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9.0 List of constraints

- Within the airfield safeguarding area for all developments as well as for birds
- Within the Zone of Influence for Exe Estuary
- Within Land identified as being on the local register of Historic Parks and Gardens
- Within an Article 4 area for HMOs
- Covered by a Local Development Order: Local Energy Networks
- Identified in the (adopted) Local Plan as within the University Campus
- Identified in the (adopted) Local Plan as within a Site of Local Importance for Nature Conservation
- Within an Environmental Smoke Control Zone

10.0 Consultations

Below is a summary of the consultee responses. All consultee responses can be viewed in full on the Council's website.

Natural England: Consultation not required on the proposed development at this location.

Devon & Somerset Fire & Rescue Service:

(Equivalent comments received in response to first and second consultations):

It would appear (without prejudice) to satisfy the criteria we would require for B5 access under Building Regulations.

Access and facilities for the Fire Service are set out in detail in Approved Document B (Fire Safety) Volume 2: Buildings other than dwellings. The Fire and Rescue Authority is a statutory consultee under the current Building Regulations and will make detailed comments at that time when consulted by Local Authority Building Control (or a registered building control approver).

Exeter International Airport: Response awaited.

Police Designing Out Crime Officer:

No objection to the scheme and there's not much to consider from a crime prevention perspective. Makes the following points:

- I note the new route running through Reed Hall Gardens will be lit meeting 'the P4 criteria outlined in BS12301-2, which recommends 5 lux of horizontal illuminance on the finished path'. Apologies but I'm not familiar with this standard. If it is deemed that this will be a designated, well used pedestrian route, lighting comparable with BS 5489:2020 10-20 lux with a uniformity of 0.40 or similar could be considered.
- Planting abutting the path should be avoided so it cannot encroach and hamper lines of sight / surveillance opportunities or provide places for concealment.
- It is recommended that CCTV is installed throughout, with coverage to include the courtyard area, pathways, terrace, lobbies, stairwells, lift, café and any other relevant area identified by the University.
- Be mindful that the balustrading of the terrace does not have a flat surface which could encourage the resting of glasses and thus cause a risk to the people below.

South West Water:

The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable (with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):

1. Water re-use (smart water butts, rainwater harvesting, grey flushing toilets)
2. Discharge into the ground (infiltration); or where not reasonably practicable,
3. Discharge to a surface waterbody; or where not reasonably practicable,
4. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable,
5. Discharge to a combined sewer. (Subject to Sewerage Undertaker carrying out capacity evaluation)

No surface water strategy details were provided with this planning application. Please note that a discharge into the ground (infiltration) is South West Water's favoured method and meets with the Run-off Destination Hierarchy. Should this method be unavailable, SWW will require clear evidence to demonstrate why the preferred methods listed within the Run-off Destination Hierarchy have been discounted by the applicant.

For Highway run off please contact the Highway Authority to agree disposal method.

The Gardens Trust: No response received.

The Royal Society for the Protection of Birds:

Recommends the installation of a number of integral nest boxes proportionate to the size and design of the building, with a preference for Universal Integral Boxes designed for Swifts but suitable for other species. Notes that there appear to be a number of locations where clusters of 3/5 with each box approx. one metre apart could be installed.

Lead Local Flood Authority (Devon County Council):

Initially, whilst raising no objection in principle, the LLFA raised a series of queries regarding the proposal to discharge into a (private) combined sewer. Their objection was withdrawn following exchanges of information and a new drainage strategy with the revised proposal, subject to a pre-commencement planning condition.

In their observations, the LLFA continues to encourage the scheme to discharge to an alternative outfall, noting that 'Discharging into a combined sewer should only be done if no alternative is available (e.g. it is too expensive to discharge elsewhere).'

Local Highway Authority (Devon County Council):

No objection subject to conditions requiring:

- Construction Management Plan (CMP)
- Details of proposals to dispose of surface water such that none drains on to any County Highway [added to the condition requested by the LLFA]

Waste Planning Authority (Devon County Council):

No objection to the proposals provided that the development is carried out in accordance with the Waste Management Plan [Condition required].

Notes that the updated Waste Management Plan identifies measures to be taken to avoid all waste occurring and demonstrates the provisions to be made for the management of any waste generated to be in accordance with the waste hierarchy. The Plan estimates the amount of waste that will be generated during demolition, excavation and construction, set out by the type of material. The Waste Planning Authority is pleased to note that a minimal amount of waste is destined for landfill, and it's still advised that the waste disposal site is located as close to the proposed development site as possible to reduce the distance waste travels.

Arts & Events Team (ECC): No response received.

Ecologist (Dorset Council Natural Environment Team):

No objection to the revised proposals subject to conditions to secure all outlined non-BNG mitigation measures regarding roosting bats and nesting birds, and compensation measures for the destruction of on-site bat roosts, as well as the proposed enhancement measures for bats and birds on site.

Notes that a European Protected Species (EPS) License for bats is required to avoid unlawful harm to species protected under the Conservation of Habitats and Species Regulations (2017) (as amended). Further notes that the compensatory bat house consented by planning permission (24/1485/FUL) must be completed prior to the commencement of works, and to meet the criteria of the EPS licence.

In respect of the BNG proposals, questions whether there may be scope to include more BNG activities on-site to reduce the net loss of biodiversity. Asks if it is possible to include more native habitat creation in place of urban vegetated habitats on-site, for example creating mixed scrub or any feasible medium distinctiveness habitat on-site as post-development to reduce the amount of offsetting through a 3rd party habitat bank and fall more in line with the BNG hierarchy. Requests justification if this is not possible.

Environmental Health (ECC):

No objection (to either the initial or the revised proposal) subject to conditions covering the following:

- Contaminated Land
- Plant Noise (including Air Source Heat Pumps)
- Construction and Demolition Environmental Management Plan (CEMP)

Conservation Officer (ECC):

Initially, the Heritage Officer was unable to support the proposals due to their harmful impact on the setting the Grade II listed Reed Hall and its curtilage listed structures, their harmful impact on the character of the historic gardens to Reed Hall, and due to their conflict with the adopted SPD for the university campus. However, the improvements secured through negotiation are recognised, and as such, the comments are no longer presented as an outright objection. The proposal no longer to use the Mews Courtyard as a construction access is particularly welcomed, and the revised proposal considered acceptable.

Comments on the 'Site Description/Context/Significance' are as follows:

- Reed Hall is a very substantial late 19th Century villa. There is very good survival of its high quality interiors, including decorative plasterwork. Its use as a university building has largely preserved the character of its interiors and also its direct functional links to its historic service buildings and impressive gardens.

- The spatial and functional relationship between the principal building, the service buildings including the stable courtyard, the formal structures within the gardens, and the layout and design of the gardens have survived well and make an important contribution to the significance of the heritage asset as a whole.
- Importance of gardens and grounds in historic context : the gardens surrounding Reed Hall originated as a 19thC botanic gardens of possibly international importance at the time, with species imported by plant hunters employed by the prominent company Veitch's.
- The gardens and the glasshouses within them were laid out to grow rare species newly identified and imported from across the world, with several specimens understood to be the only example in the UK / Europe at the time
- The application site is the site of the functional glasshouses where it's likely that some of the specialised horticultural work of caring for the rare species took place. It is very likely the glasshouses within the application site were heated, with heat generation taking place in the vaults below the glasshouses.
- The large area for glasshouses complemented the microclimates elsewhere in the gardens.
- The glasshouses within the application site were additional to the more usual productive glasshouses which were against the walls of the large kitchen garden to the west of the site.
- The application site has historic significance in relation to its past function and role in the development of the gardens. It's particularly significant for its working class history – the skilled gardeners who actually carried out the work that resulted in the survival of rare imported plants and seeds. It's also significant for its technological history, with good survival of evidence for the heating systems that warmed the glasshouses.
- It is important to recognise the heritage significance of sites of working class historic significance within historic estates. While the working areas may not be of architectural significance, they are nevertheless of historic and cultural significance.
- The walls, cobbled surfaces and structures in the glasshouse courtyard are curtilage listed.
- The mews and stable yard to Reed Hall are curtilage listed. They are delightful, formally designed buildings set around a cobbled courtyard.
- The site of the former glasshouses has a really strong material character, with historic stone cobbles, brick walls, historic mortar contributing to its character.

The MAIN ISSUES are identified as:

- Impact on the significance of listed buildings
- Impact on the setting of listed building
- Impact on the significance of non-designated heritage asset (locally registered Park and Garden)

In the interests of completeness given the importance of heritage to this application, the Heritage Officer's comments on the proposals themselves are included in full:

'DEMOLITIONS AND SITE ACCESS

I am really pleased that the original proposals relating to site access and site compound have been completely altered following my earlier objection. I am satisfied that the site access and site compound as now proposed will not have a harmful impact on the significance of heritage assets.

Consent is sought for the demolition of curtilage listed service / functional garden buildings and the lifting of historic paving and surfacing within the development site. The buildings proposed for demolition are simple functional outbuildings and while they have historic and evidential value, their overall contribution to the significance of the heritage asset is not high. Nonetheless, they make a moderate contribution to one's understanding of the activities that took place in the glasshouses and service areas of the gardens.

As decision maker, you will need to weigh up the heritage harm arising from the total loss of these service buildings against any public benefits arising from the development. My advice is that since their significance lies primarily in the contribution they make to understanding of past uses of the site, rather than in the significance of their architecture or physical fabric, the loss of these buildings may be justified by clear public benefits. Provided that understanding can be furthered by appropriate recording prior to / during demolition and the publication of findings, you would not be unreasonable to conclude the loss may be justified.

I am very pleased to see that extensive re-use of the historic bricks and paving materials is proposed within the revised development. The incorporation of re-used historic materials in the design of the new building will help to anchor the new building in its historic context and is positive from my perspective.

IMPACT OF THE DEVELOPMENT ON SETTING OF HERITAGE ASSETS

The application site was historically the site of the many glasshouses that were an integral functional part of the gardens at Reed Hall. As a functional area, it was not part of the designed landscaping of the gardens, and formal planned views out from the house were not directed to look directly at this area.

The height and scale of the proposed new building means the delicate balance between intended views and vistas and the more recessive practical area of the garden will be disrupted. However, since my original comments the building design and layout within the site has been amended. I am confident that the impact on views from within the garden immediately south-east of Reed Hall has been reduced by the design amendments. While there will still be some unavoidable impact, the level of harm when viewed from the south-east has been reduced. It is for you as decision-

maker to weigh up the moderate level of harm when viewed from the south-east against the public benefit of the proposal.

However, despite the design revisions, it remains inevitable that there will be a harmful impact on the setting of Reed Hall and its stable courtyard when viewed from the west and south-west. The scale of the proposed new building alongside its proximity to the stable courtyard means that harmful impact on setting is unavoidable if the principle of development at the desired scale is accepted.

The existing historic buildings of the stableyard will be dwarfed by the height and scale of the proposed building. Their setting will unavoidably altered, and the level of harm will be at the higher end of “less than substantial” harm – there will be no direct impact on historic fabric in the courtyard but the experience of the historic character of the space will be considerably altered, particularly when experienced from within the courtyard. The level of harm will fall well below the level of substantial harm.

There is a formal pedestrian approach to the principal entrance elevation of Reed Hall up a series of formal stone steps. This approach offers planned views of Reed Hall, revealed as one ascends closer to the house. Due to the scale and massing of the proposed new building, it will appear clearly noticeable in the background of views on this approach to Reed Hall. The same will be the case using the vehicle approach up Streatham Drive. This will result in harm to the setting of Reed Hall. As with the impact on the setting of the stable yard, the level of harm will fall below the level of substantial harm. However, because the impact will be on the setting of the principal elevation of the principal listed building and the impact is likely to be long-lasting in duration, the level of harm to this element of the building’s setting will be at the higher end of “less than substantial” harm. As decision-maker you will need to satisfy yourself that there is clear and convincing justification and sufficient public benefit to outweigh the harm.

MITIGATION

The applicant has offered a package of enhancement works to historic structures and pedestrian routes within the garden, within the setting of the proposed development. The enhancements are welcome and will help to better reveal the legibility of the historic garden layout and structures.

The applicant has also proposed re-using reclaimed historic materials which will be recovered from the demolitions on the development site. Specifically: the granite setts will be re-used within the design of the outdoor space around the proposed new building, and the brickwork of the demolished service buildings will be re-used to face the external entrance façade and lower wall of the building facing onto Mardon Hill. This proposal is also welcome and will go some way toward helping to integrate the new building within its historic setting.

The garden history of Reed Hall is an important element of its significance. A positive element of the proposed development is the focus on creating garden spaces around the new building that reflect and respond to the garden history of the site. During the course of design revisions the garden spaces have become better linked to the existing garden, which again is positive.

OVERALL

Overall, taking all the elements of the scheme into account including the mitigation measures proposed including detailed recording of the buildings to be demolished, my conclusion is that the level of harm to the overall significance of Reed Hall (including all its curtilage listed structures and its garden setting) will fall fairly centrally within the “less than substantial” level of harm. Similarly, the level of harm to the locally-registered Park and Garden (non-designated heritage asset) falls within the “less than substantial” level of harm. It is for you as decision-maker to weigh the planning balance and determine whether the public benefits of the development outweigh the harm to heritage assets.

Conservation Officer (ECC):

(Follow up comment in respect of building recording):

My view is that a level 4 analytical record will be needed of the development area. This is because the total loss of all historic structures and features within the development footprint must be mitigated by recording that is sufficient to capture all the information the site holds, and make it available for future researchers.

In addition to full measured survey of the standing buildings and structures, and a full measured survey of the extant surface features, it is highly likely that industrial archaeology will be revealed within the ground surfaces and the vaults below. There is likely to be at least some evidence of the technology used to control the temperature (and possibly also humidity) of the glasshouses and propagating areas. It will be necessary to make an analytical record of all these elements, to capture as much information as possible on the technology in use at the time and how it contributed to the use of the site. Depending on what survives, this might include detailed analytical drawings of hydraulic or heating systems.

All will need to be written up as a full report, including documentary research and analysis of what is recorded. Some of the initial work has already been done in preparing the submitted heritage statement, but I would hope more documentary research could be carried out specifically on the horticultural and technological aspects of the heritage of this site.

Net Zero Team (ECC): No response received.

Tree Manager (ECC):

Raises no objection to the proposed tree removals given that they are primarily young trees with two mature malus unsuitably located at the top of a wall (there are some uncommon specimens but nothing of particularly high value). Confirms that none of these trees fall into the TPO recommendation value using the TPO evaluation scoring system.

Suggests that some of the trees to be removed may be suitable for relocation and suggests that this be advisory (informative) rather than a condition requirement.

Confirms that the tree protection measures proposed appear adequate and that the minor pruning required is of minor consequence.

Urban Design and Landscape Officer (ECC):

Supports the application in principle, acknowledging that improvements have been made since the initial submission. Considers there to be some residual harm due to the scale of the development, which is greater than anticipated by the SPD, but acknowledges that further reductions in the building's massing are unrealistic without compromising the project's brief and intended outcomes. Offers qualified support to the application subject to a package of wider improvements [to land immediately surrounding the site] which are considered necessary to balance the residual harm, along with several conditions which are considered essential to ensure that relevant parts of the scheme are of the quality necessary for this sensitive location.

The Urban Design and Landscape Officer's comments point out that the Streatham Campus Masterplan SPD (2010) did not anticipate major development in this area, instead envisaging only smaller, sensitive interventions. They state as a consequence that any new building should be of exceptional design quality and should respect the historic landscape.

Their numerous detailed comments on the design quality are summarised as follows:

- The design has improved following feedback, particularly by:
 - reducing the length of the wing that projects towards Reed Hall allowing for more landscaping and tree planting;
 - rationalising and simplifying the southwest elevation which will remain visible from the Mews Courtyard below, and
 - improving the relationship between the building and the former productive garden, by adjusting both the language of the southern façade (including improved fenestration) and the posture of the building, and by creating a physical connection between the terrace and the adjacent landscape.
 - improving the covered walkway/loggia at upper level 02 [which links the IAIS building to the building at the level of the café]

- improving the Mardon Hill entrance and pulling the cantilevered deck on which it relies further back away from the gable end of the adjacent mews building
 - revising the material strategy for the building and the landscaping
- At the time of writing, two aspects of the proposal were noted as remaining unresolved: revisions have been requested to:
 - the placement of dividing screens on the SW façade (which need better coordination with both the historic and new elements), and
 - the design of the ‘dwell point’ on the proposed new path, which ought to mark a change in character along the path through the former productive garden, whilst creating a memory of the original wall.
- Subject to the final detail of the ‘dwell point’ mentioned above, and to any changes to the existing access from the IAIS terrace, the proposed accessible path is considered acceptable. However the lighting must be carefully designed, and ideally lighting (and seating) to the existing ‘Lit path’ would also be upgraded to match

They consider that planning approval should be conditional on securing the following additional information:

- Submission of material samples for approval.
- Details of artificial lighting for new and existing pathways.
- Submission of a Landscape Environmental Management Plan (LEMP).
- Wider landscape/heritage improvements, which ought to include rationalisation of existing plant/apparatus in the vicinity of the vaulted undercroft, upgrades to the existing ‘Lit Path’ and some improvement to the existing railings on the south side of Mardon Hill which protect users from the retaining wall to the lightwell to the Mews building, but currently detract from its setting.

Exeter Civic Society: No response received.

Exeter Cycling Campaign: No response received.

Living Options Devon: No response received.

11.0 Representations

Two full rounds of publicity have been undertaken, each consisting of advertisement in the press, weekly list and notices erected on site. No public representations were received.

12.0 Relevant policies

National Planning Policy and Guidance

National Planning Policy Framework (NPPF) (2025) - in particular the following sections/paragraphs:

2. Achieving sustainable development

8 – Achieving Sustainable Development

4. Decision-making

39 – Positive and creative decision-making working proactively with applicants

40-43 Pre-application engagement

48 – Determining applications for planning permission in accordance with the development plan, unless material considerations indicate otherwise

56-57 – Planning Conditions

6. Building a strong, competitive economy

85 – Placing significant weight on the need to support economic growth and productivity... The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

8. Promoting healthy and safe communities

96 – aiming for healthy, inclusive and safe places, which (a) promote social interaction, (b) are safe and accessible... – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and (c) enable and support healthy lives...

102 - promote public safety and take into account wider security... requirements

105 - enhance public rights of way and access, including taking opportunities to provide better facilities for users...

9. Promoting sustainable transport

109 - identify transport solutions that deliver well-designed, sustainable and popular places.

117 – (a) give priority first to pedestrian and cycle movements... and second – so far as possible – to facilitating access to high quality public transport, (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) create places that are safe, secure and attractive... and...(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations

11. Making effective use of land

124 - promote an effective use of land in meeting the need for homes and other uses

125 – (c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, (d) promote and support the development of under-utilised land and buildings,
128 - support development that makes efficient use of land, taking into account: d) the desirability of maintaining an area's prevailing character and setting ...; and e) the importance of securing well-designed, attractive and healthy places

12. Achieving well-designed places

131- the creation of high quality, beautiful and sustainable buildings and places

135 – (a-f) requiring good design from development

136 – trees

137 – Consideration of design quality throughout the evolution and assessment of individual proposals

139 – refusal of development that is not well designed

140 – planning conditions securing good design, and ensuring that the quality of approved development is not materially diminished between permission and completion

14. Meeting the challenge of climate change, flooding and coastal change

161 - supporting the transition to net zero by 2050

166 – expect new development to (a) comply with any development plan policies on local requirements for decentralised energy supply... and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

182 – Sustainable Drainage Systems

15. Conserving and enhancing the natural environment

187 - contribute to and enhance the natural and local environment by... (d) minimising impacts on and providing net gains for biodiversity, including by... incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

196 – ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination

16. Conserving and enhancing the historic environment

202 – Heritage assets... are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

207 – applicants should be required to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance

208 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

210 - In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

212 - when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

213 - any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

215 - where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

217 - Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

218 - Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible

219 - Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Planning Practice Guidance (PPG):

Biodiversity net gain

Climate change
Design: process and tools
Effective use of land
Historic Environment
Land affected by contamination
Natural Environment
Noise
Use of planning conditions

National Design Guide (MHCLG, 2021)

GPA3 – The Setting of Heritage Assets (Historic England, December 2017)

GPA2 - Managing Significance in Decision Taking (Historic England, March 2015)

HEAN 2 – Making Changes to Heritage Assets (Historic England, February 2016)

Understanding Historic Buildings: A Guide to Good Recording Practice (Historic England, May 2016)

Manual for Streets (CLG/TfT, 2007)

Cycle Infrastructure Design Local Transport Note 1/20 (DfT, July 2020)

Protected species and development: advice for local planning authorities (Natural England and DEFRA, 7 January 2021)

Development Plan

Core Strategy (Adopted 21 February 2012)

CP1: Spatial Strategy
CP2: Employment
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

The Exeter Local Plan First Review (Adopted 31 March 2005) – Saved Policies:

AP1 Design and Location of Development
AP2 Sequential Approach
E4 Exeter University Campus
T1 Hierarchy of Modes

T2 Accessibility Criteria
T3 Encouraging Use of Sustainable Modes
T9 Access to Buildings by People with Disabilities
T10 Car Parking Standards
C2 Listed Buildings
C4 Historic Parks and Gardens
C5 Archaeology
LS1 Landscape Setting
LS4 Local Nature Conservation Designations/RIGS
EN2 Contaminated Land
EN3 Air and Water Quality
EN4 Flood Risk
EN5 Noise
EN6 Renewable Energy
DG1 Objectives of Urban Design
DG2 Energy Conservation
DG7 Crime Prevention and Safety

Devon Waste Plan 2011 – 2031 (Adopted 11 December 2014) (Devon County Council)

W4 – Waste Prevention
W21 – Making Provision for Waste Management

Other Material Considerations

Emerging Exeter Local Plan (Regulation 19, Submitted for Examination September 2025)

S1: Spatial strategy (Strategic policy)
CC1: Net zero Exeter (Strategic policy)
CC2: Renewable and low carbon energy
CC3: Local energy networks (Strategic policy)
CC5: Future development standards (Strategic policy)
CC6: Embodied carbon
CC7: Development that is adaptive and resilient to climate change
CC8: Flood risk (Strategic policy)
EJ1: Economic growth (Strategic policy)
STC1: Sustainable movement (Strategic policy)
STC2: Active and sustainable travel in new developments (Strategic policy)
STC3: Supporting active travel (Strategic policy)
STC5: Supporting new forms of car use
NE3: Biodiversity (Strategic policy)

NE6: Urban greening factor
NE7: Urban tree canopy cover
HH1: Conserving and enhancing heritage assets (Strategic policy)
HH3: Archaeology
D1: Design principles (Strategic policy)
D2: Designing Out Crime
HW2: Pollution and contaminated land

Exeter City Council Supplementary Planning Documents:

University of Exeter Streatham Campus Masterplan Framework SPD (2010)
Sustainable Transport SPD (2013)
Trees in relation to development SPD (2009)

Devon County Council Supplementary Planning Documents:

Minerals and Waste – not just County Matters Part 1: Waste Management and Infrastructure SPD (July 2015)

Net Zero Exeter 2030 Plan (Exeter City Futures, April 2020)
Archaeology and Development SPG (November 2004)

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.

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.

Due to the location of the site within the University Campus (and away from its public boundaries), no such issues have been flagged or need to be considered in detail.

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.

Equalities issues have been considered during the course of the assessment. Particular care has been given to try to ensure that access for those with protected characteristic ‘disability’ has been catered for. Despite the challenging topography, a disabled parking space is provided and from here building users will be able to access all parts of the building and its outdoor spaces via the level 02 access and lift. A wider benefit brought by the scheme will be improved access for disabled persons into and across the gardens immediately south of the site (currently only accessible via steps to the north west).

User safety is also a particular consideration when crossing the campus, and is of particular relevance to protected characteristic ‘sex’ given the need to take particular care to ensure women’s safety. Although improvements are being sought to the existing ‘Lit Path’ lighting, safety will be critical in making any changes. Subject to conditions, planning and ecology officers also consider that it will be possible to light the new path to ensure user safety despite the uses of the site by protected light averse Bat species.

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 on 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

The main financial considerations relate to the benefits the development will bring to the university, and the wider benefits that the facility will bring to the city through inward investment, research funding, and the economic benefits brought to the city by both domestic and international students. These benefits have been set out in one of the submitted documents (11/09/2025_AQB Public Benefits Statement_v1.7 11.09.25) to enable them to be weighed against any heritage harm arising in accordance with the heritage balance to be carried out to satisfy NPPF paragraph 214. Within the document it is explained that the development is being facilitated by a significant capital donation from a PhD graduate of the University.

Given its proposed educational use, no planning obligations are required.

Non material considerations

CIL: The scheme will not deliver housing or retail space and as such no CIL is payable.

16.0 Planning assessment

The key issues are:

1. Principle of Development
2. Economic and Social Benefits
3. Access and Transport Considerations

4. Design and Impact on Heritage and Landscape
5. Impact on Trees, Ecology and Biodiversity Net Gain
6. Sustainability (including Surface Water Drainage)
7. Amenity Impacts
8. Heritage and Planning Balance

1. Principle of Development

The proposal is for an educational use within the University Campus. Saved Local Plan Policy E4 states: *The development of education uses, student housing and research and development initiatives, including ancillary production, will be permitted on the University of Exeter campus provided that the character and setting of the campus is protected.* The use is therefore acceptable in principle subject to other issues including the preservation of the character and setting of the campus.

The campus is also the subject of an SPD (December 2010) which sets out a Master Plan Framework for the campus. Whilst it is notable that the SPD does not propose any major development in this ('Reed Hall') area (paragraph 8.6.4), nor does it explicitly prevent it. The stated objectives for this area are as follows:

The existing character of Reed Hall and its landscape should be retained. No major development is proposed but smaller scale, sensitive development could be appropriate to replace the 1970s catering block to the rear of Reed Hall and the theatre workshop buildings to the north of Reed Hall.

Under the heading 'Potential for redevelopment', it states: *Smaller scale sensitive development could be appropriate to replace the 1970s catering block to the rear of Reed Hall and the theatre workshop buildings to the north of Reed Hall.*

It is also worth noting that the site lies within the Curtilage of Reed Hall, which is a Grade 2 Listed Building, and that the land in this area is a locally designated Historic Park & Garden: There are two entries for the university campus on the Devon Gardens Trust website: Reed Hall gardens and also the Streatham campus as a whole. The site lies within both.

Overall therefore, whilst the introduction of new educational floorspace is acceptable in principle in this campus location, the site is heavily constrained in terms of heritage and character, and the SPD envisages only small scale development. Detailed consideration is therefore required to ascertain whether the development can be found to be acceptable in this location.

As explained earlier in this report, the proposal before members has undergone a rigorous redesign in conjunction with officers and the Design Review Panel. At the outset of this process, officers questioned whether the application site was capable of

accommodating a significant building that can fulfil the University's brief (given its highly constrained nature in heritage terms). Officers therefore asked whether alternative locations for the facility could be found on the campus. However, officers came to understand that the adjacency of the building to the IAIS building is critical to its success due to its aligned academic vision. Furthermore, officers have also accepted that there is a minimum floorspace requirement for a building of this type given the need for it to fulfil a number of flexible requirements. The University has advised through the process that there is no scope to further reduce the floorspace. Officers have therefore worked with the University's team on the design of the building and on its integration into its heritage and landscape setting to minimise the harm caused to its sensitive historic context whilst maintaining the floorspace sought. Later in this report, officers explain the heritage balancing process that is required to address paragraph 214 of the NPPF, whereby public benefits arising from a proposal can be balanced against harm to heritage assets. In anticipation of this, officers have sought to identify benefits as well as harm from the proposal in each of the key policy areas.

2. Economic and Social Benefits

Reflecting the need to outweigh harm arising from the proposal, officers requested that the public benefits of the proposal be clearly outlined alongside the redesigned and resubmitted proposal. Two separate statements have been submitted.

The first document '[AQB Public Benefits Statement v1.7 11.09.25](#)' outlines the benefits that the University anticipate will arise from the proposal, summarised under the following 5 headings:

1. Educational and Research Benefits
2. Community and Cultural Engagement
3. Environmental Sustainability
4. Economic and Social Contribution
5. Design Quality and Heritage Context

To ensure that the benefits are not underplayed or miscommunicated in an officer summary, Members are encouraged to read the document in full.

Whilst officers accept that it is difficult to quantify the economic benefits that will arise from a specific proposal, the benefits of the University to the City and the wider region are fully understood. The document sets out that:

An independent economic impact study launched by the University found that the university contributes almost £1.6 billion of output to the UK economy and supports 15,500 jobs through its economic activities and the impact of student and visitor spending:

- £951.4m of output for the Heart of the Southwest Local Enterprise Partnership area, with £582.5m GVA, and 12,300 jobs.
- £915m of output for the county of Devon, equating to £563.4 GVA, and 11,920 jobs.
- £816.3m of output for the city of Exeter, totalling £509.4m GVA and 9,750 jobs – equivalent to 9% of the city's total, making it the second largest employer in the city.

Separately, a University representative advised officers that the building will specifically facilitate an increase in International Post Graduate Teaching annualised income of £6.7m, and research income of £2.0m. Given the focus of the facility on the Academic Vision of 'Sustainable Development Goals in the Global South' it seems likely that the building will help to attract international students. The statement quotes Universities UK, who found in 2023 that - for the 2021/22 cohort -international students alone contributed £140.7m to the Exeter economy.

The potential of the building to support the enhancement of the University's global and national reputation by building on existing strengths relating to the United Nations 'Sustainable Development Goals in the Global South' will also be supplemented by more typical economic benefits. For example, the statement confirms that the construction phase will support several local based businesses involved through subcontractor arrangements and provision of support services estimated to be in the region of £7.5 - £8.0m over the two year construction period. Following occupation the building will also support approximately 80 academics as well as employment associated with the management and maintenance of the building (including roles relating to the café, catering and cleaning, landscaped gardens, and servicing PV panels, lifts and other hardware).

The building will also support wider objectives of the University, by addressing shortfalls in its teaching floorspace and supporting its Access and Participation Plan 2025- 2029. The statement explains that the University is committed to enabling social mobility through education, and the facility will support its outreach activities (including school and community visits) and increase the fully accessible floorspace availability to students with disabilities.

NPPF paragraph 85 states that '*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.*'

Para 87 states that '*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:*

a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections)...

c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

Officers have no doubt that the University makes a very significant contribution to the City's economy, and it is clear that this building will bring significant further economic and social benefits. The NPPF extracts above make clear that the economic objectives are very important material considerations in decision-making, and it is clear in this case that the benefits that are expected to arise from this facility are to a significant degree dependent on its location adjacent to the IAIS building. Whilst officers must always bear in mind that the University could ultimately use the proposed floorspace for any University use, it seems very likely that this facility will enable it to strengthen its specialisms in this particular academic and research sector, and that these will bring significant economic benefits. Officers therefore consider that the likely economic benefits can be given significant weight in the decision-making process.

The second statement details localised benefits surrounding the site which are primarily heritage related. Whilst the site is currently subject to high levels of footfall as a transition space, it (along with surrounding spaces) has evidently been less productively used than other parts of the campus for a number of years. As such, some of its features have been neglected in terms of maintenance and have fallen into disrepair, despite all lying within the locally registered park/garden and the curtilage of the Grade II Listed Reed Hall. In bringing a new focus of activity to the area, officers consider that restoration and improvement works are justified in a number of locations surrounding the site. These are discussed in more detail below.

3. Access and Transport Considerations

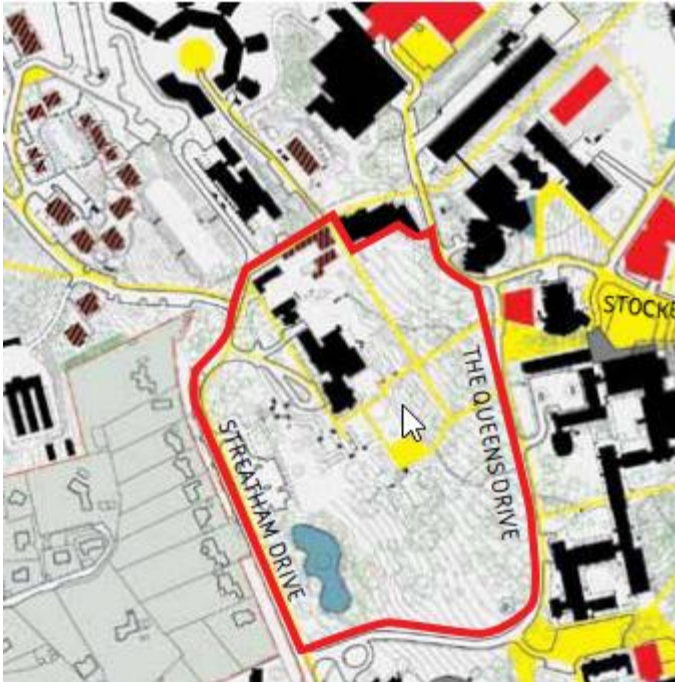
As a building within the existing campus, in which there is already an ongoing strategy to rationalise and ultimately reduce car parking provision, additional car parking is not proposed. Officers consider this acceptable, and do not consider any specific mitigation to be needed to prevent or manage additional car trips to the campus. One disabled car parking space is proposed, and officers support its inclusion. The challenging topography of the site are such that this must be located a short distance to the north east, between the IAIS building and the path that joins Mardon Hill to Stocker Road. This location will allow for easy access to the building via the Level 02 entrance, and will also link to the new path across the green space. The University have advised that it is not possible to provide an EV charge point with

this facility for insurance reasons given its proximity to buildings, but charge points are provided elsewhere on campus (including 30 charging bays in Car Park B).

As discussed elsewhere, the site currently serves as a key node in terms of pedestrian movements from the north and western parts of the campus to its heart. Students from the extensive complex of Halls known as 'Birk's Grange Village' to the west, as well as those from Clydesdale and Nash halls to the North West, pass through the site to access the 'Lit Path' that links Mardon Hill to 'Streatham Centre' (the heart of the campus) via the application site and the adjacent former productive garden. The 'West Park' project to redevelop the Clydesdale area (c1700 bedspaces) that has recently commenced will significantly increase these movements. Prior to COVID, the Lit Path could be accessed via two routes: the historic stone staircase that rises from the Mews Courtyard was closed at that time due to social distancing and has not been reopened, leaving only the route through the former potting sheds via the site itself. A key aspect of the design considerations has therefore been the degree to which the development facilitates those cross-site movements on an ongoing basis, and how the design of the building signals its main arrival points as well as accommodating and responding to movements through. These points are discussed as part of the design section of this report.

Related to the above, one aspect of the proposal that has been challenging in landscape and heritage terms is the proposed new N-S route across the former productive garden. This will lead from Mardon Hill at the north east corner of the site, between the proposed building (past the level 2 access) and the IAIS building via the gardens, and will join the existing Lit Path to the south of the site. Whilst part of the proposals, and important to the scheme in order to provide an accessible route to the building from the south (Mardon Hill itself being too steep for wheelchair users at 1:6), this route will also serve a wider function. The yellow routes in the SPD extract below (from the Reed Hall section at 8.6.4 but replicating a diagram from the access strategy in section 8.5) show a N-S route through this area, and under the heading 'Landscape and Public Realm' the SPD includes the aspiration '*Development of more direct pedestrian links between Holland & Mardon halls and heart of campus through IAIS / theatre workshops*'. The proposal is seeking to deliver these direct links through a greenspace in which there are multiple very clear desire lines that are not currently provided for as formal paths through the greenspace.

By following the contours, the path aims to provide an accessible (less than 1:12) route not only to serve the campus, but to link Holland Hall to the Heart of the campus via the N-S part of Mardon Hill.



Extract from Campus SPD Reed Hall section at 8.6.4 / Access Strategy section 8.5

Whilst it has been challenging to incorporate this route in a manner that respects both the historic layout and character of this former productive garden and the parkland arboretum landscape characteristics that it has developed over time, officers support the creation of an accessible route in this location and consider its successful inclusion to be a benefit brought by the development. It will provide an improved route from Holland Hall to the heart of the campus and will also facilitate wheelchair access into this green space.

In terms of cycle infrastructure, 14 cycle parking spaces are proposed. The Sustainable Transport SPD doesn't have a clear requirement for educational buildings of this type, although it requires 1 space per 4 FTE staff (plus 1 per 7 thereafter), for office uses assuming 1 FTE per 12.5sq m of office. This would generate a demand for 8 spaces based on the level 01 workspace alone (c340 sq m), and doesn't take account of staff for on-site facilities such as the café. For visitors the SPD states only (for educational establishments) '*Consider on an individual basis depending on age and other characteristics of students*'. Generally speaking, 14 spaces feels too few for the likely number of building users.

An equivalent concern is that none of the cycle parking is covered. Exposure of bikes to the weather will be a significant disincentive to regular and longer term use (such as by staff based at the building). This is something that is acknowledged by both national guidance (LTN1/20) and by Devon County Council's Cycle Parking Design Guidance to which the Sustainable Transport SPD cross-refers). It appears that it would be possible for the 8 spaces north of IAIS to be covered, and as such a condition requiring this is recommended.

Whilst officers would have preferred more, high quality covered and secure cycle parking for the facility, officers do acknowledge that the site is constrained in terms of the space available, and that its topography is also very challenging. Officers also acknowledge that students who cycle to the campus are likely to park their bikes centrally and then walk between buildings, and that there will be more suitable locations for secure and weatherproof student cycle parking. It is also understood that the University are reviewing the potential to add new cycle stores in various positions around the campus in line with the following actions, which are included within their own Sustainable Transport Strategy 2024-2030, which includes the following actions:

27 - Improve the quality of cycle parking and cycle maintenance facilities across our campuses, including residences, considering safety, accessibility and needs (medium term)

28 - Improve facilities for active travel, including showers, changing rooms, lockers and drying facilities. (Short term)

29 - Increase the availability of electric bicycle charging points. (medium term)

Ultimately, recognising the constraints of the site and its likely patterns of use, officers consider the cycle parking acceptable.

In terms of construction access, this will be a challenging site to construct given its highly constrained nature and steep topography. For reasons set out in the heritage section of this report, officers did not support the proposed use of the Mews Courtyard as a construction access/compound. It is therefore proposed to use the catering courtyard which is slightly closer to Reed Hall. Whilst access will be challenging, this will be a localised issue, the impacts of which will need to be carefully managed by the University to ensure student and staff safety. The aspects of construction management requested by the Highway Authority will be included in a suitably worded condition.

4. Design and Impacts on Heritage and Landscape

The design, heritage, and landscape matters together comprise the single biggest issue for this proposal and are so interrelated that it is difficult to separate them. Due to the more rigorous assessment framework that is established by its protection in law, this report will consider all these issues from a heritage perspective.

As set out in the site description, the site comprises part of the curtilage of the Grade II listed Reed Hall, such that the historic structures within it are curtilage listed. It is also within a locally registered park and garden. The demolition of listed structures that is necessary to clear the site requires Listed Building Consent, and Listed Building Consent is also required for many aspects of the works given that they will physically interact with the listed structures. For this reason, officers have agreed

that it is sensible for both applications to include the same scope of drawings etc, albeit that the planning file does include some additional documentation. Similarly, both applications are considered through this single committee report. Changes within the landscape setting must also be carefully considered not just because the immediate landscape has been historically altered during the construction of Duryard Lodge and subsequently Streatham (now Reed) Hall, but because the gardens themselves are identified as (non-designated) heritage assets by virtue of their inclusion on the local Gazetteer maintained by the Devon Gardens Trust. This reflects the fact that they were designed and formally laid out by the Veitch family to provide a fitting setting to the Italianate Reed Hall.

In considering whether to grant listed building consent for any works, the council must be mindful of its duty as set out in section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building, its setting and features of special architectural or historic interest which it possesses. Section 66 of the same act places the same duty on the council when considering whether to grant planning permission for development which affects a listed building or its setting. Importantly, when balancing any such impacts against other material considerations in the planning balance, the courts have established that the desirability of preserving listed buildings and their settings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when carrying out the balancing exercise (*Barnwell Manor Wind Energy Ltd v E.Northants DC*, *English Heritage, National Trust & SSCLG* [2014] EWCA Civ 137). This is because, unlike other material considerations, heritage assets benefit from statutory protection.

More recently *Mordue v Secretary of State for Communities and Local Government and others* [2015] EWCA Civ 1243 established that the paragraphs set out in the NPPF establish a reasonable framework for assessing such impacts.

From paragraph 207 onwards, the NPPF provides clear guidance on ‘Proposals affecting heritage assets’. In paragraph 207 it states ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.’. Officers consider that the submitted Heritage Assessment fulfils that requirement adequately.

In paragraph 208, the NPPF states ‘Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.’

In light of the legal and policy framework and the location of this site within the curtilage of a listed building, an understanding of the heritage significance of the site is considered to be an essential starting point for any consideration of design. The LPA's assessment of the significance is set out in full in the consultation response from the Conservation Officer. A summary of these comments is as follows:

- Reed Hall is a very substantial late 19th Century villa, the high-quality interiors of which and direct functional links to its historic service buildings and impressive gardens survive well as largely as a result of its use as a university building.
- The spatial and functional relationship between the principal building, the service buildings including the stable courtyard, the formal structures within the gardens, and the layout and design of the gardens have survived well and make an important contribution to the significance of the heritage asset as a whole.
- Importance of gardens and grounds in historic context – The 19th-century botanic gardens featured rare species imported by Veitch's plant hunters, with some specimens believed unique in the UK or Europe at the time.
- The application site was where specialised horticultural care for these rare species likely occurred, with glasshouses supporting the gardens' microclimates, distinct from the productive glasshouses in the kitchen garden to the west. It is historically significant for its role in the gardens' development, especially its working-class history relating to skilled gardeners, and its technological history due to surviving heating systems for the glasshouses. Sites of working-class historic value are often overlooked in favour of preserving high-status displays of wealth and power.
- The former glasshouse site retains strong material character through its historic stone cobbles, brick walls and structures, and mortar, all of which are curtilage listed.
- The mews and stable yard at Reed Hall are also curtilage listed, noted for their formal design and cobbled courtyard.

Considering firstly the impacts on the heritage significance of the site itself, officers are pleased that the revised scheme will reclaim and reuse significantly more historic materials from the site than the initial scheme. However, the arrangement of historic fabric at the site that allows its historic function and character to be understood will essentially be lost as a result of the proposal. Whereas a smaller building designed as a lightweight modern structure sat within the retained historic walled garden may have allowed more of the site's character to be preserved this building will occupy the site in a way that will eradicate much of that historic character. The retention of the vault (which will be less impacted following the revisions due to the raising of the basement floor level) with its cast iron furnace, the retaining wall to the Mews Courtyard, the terracing and retaining walls immediately south of the site, and in particular small remnants of the retaining wall between the site and the former productive garden and the IAIS building, will at least allow the relationship of the site to retained adjacent gardens to be understood. However officers consider that harm will arise to the

significance of the site itself as a result of the significant loss of buildings, fabric and character proposed.

Paragraph 214 of the NPPF states: *Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Officers acknowledge that the proposal is not for total loss of Reed Hall, but some of its curtilage listed structures will nevertheless be completely demolished. In this case, officers recognise under criterion (a) that efficient use of the site (including these utilitarian buildings) is challenging. With reference to criterion (d), officers do acknowledge that the benefits of bringing the site back into use will weigh against the harm arising. Whether the public benefits are considered substantial and sufficient to outweigh the harm is discussed elsewhere in this report.

If the loss is accepted, it must be in accordance with the requirements of NPPF paragraph 218 which states that *'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (footnote 76: Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.)'* Officers initially raised concern about the lack of survey work documenting existing listed structures to be demolished, and in response it has been agreed by the applicant that the site and its historic buildings will be recorded to a high level of detail prior to demolition. The Conservation Officer advises that a level 4 comprehensive analytical record is required in accordance with Historic England Good Practice Guidance. Officers recommend that this is secured through the archaeology conditions, which have been adapted to cover building recording alongside archaeology (full details will be agreed through the Written Scheme of Investigation required by the condition). Full recording of this type will ensure that although the structures themselves will be lost, detailed information about them will be captured and made publicly available. Conditions are also proposed to secure the reclamation of materials (notably bricks and stone landscaping materials, steps etc) from the site for reuse in the building and its landscaping. Reuse will go some way towards offsetting the harm associated with the proposed loss.

The Conservation Officer has also highlighted NPPF paragraph 217: *Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.* Whilst it is unlikely that this project would halt following demolition, it remains necessary to minimise this risk: the best available way to do so is to attach a condition which prevents demolition until such time as evidence can be provided of there being a contract in place for redevelopment. In the past, such conditions were frequently attached to 'Conservation Area Consent' permissions which permitted the demolition of buildings of merit within Conservation Areas.

Subject to the conditions set out above, and taking into account the public benefits of the proposal discussed elsewhere in this report which officers consider that it would be impossible to realise without a significant degree of loss of fabric from the site, the demolition is considered justified. Officers welcome the fact that the vault will be retained (including its furnace) and whilst it is unfortunate that its beneficial use has not been incorporated into the scheme, it will nonetheless remain in the interests of aiding future legibility of the site's function and historic character.

IMPACTS ON THE SIGNIFICANCE OF THE GARDENS AND THE SETTING OF THE LISTED BUILDINGS

Looking beyond the immediate site, the design of the gardens has been highlighted as being of significance. Although the locally registered nature of the park and garden are such that in itself it is considered a non-designated heritage asset (subject to NPPF paragraph 216), where it is part of Reed Hall's curtilage it can be given greater weight depending on the degree to which the setting of the specifically listed assets is affected (the Italianate terracing and steps to the west and east of the site are Grade II listed in their own right).

As well as the presence of exotic species of interest, the gardens were conceived and formally laid out alongside the house itself as a singular Italianate 'experience'. In considering the impact of the proposals on views, the applicant's agent states *'The key views which contribute to the significance of Reed Hall are those which allow for an appreciation of the wider topography and landscape of the Exe Valley. These views are principally from the front of Reed Hall and the steps and terraces around the entrance to Reed Hall. They allow for an appreciation of the original architectural design intent which uses the wider 'borrowed' landscape to extend from the designed, formal elements of the garden and surrounding park into the distant view. These views make a strong contribution to the significance of Reed Hall...'* (Archaeological Assessment & Heritage Statement 9.42).

Officers agree with this analysis, and agree that these views will be unaffected by the proposals. However, there are a number of other views available from various locations around the site that have the potential to be impacted by the proposed

building and to give rise to harm to the setting of Reed Hall and its associated curtilage listed buildings, as well as harm to the locally registered park/garden.

Six specific viewpoints were agreed and views of the building have been prepared from the architect's 3D model. Members should be aware that these are not 'verified' views of the type that would be expected in a Landscape or Townscape Visual Impact Assessment. Despite this they are considered helpful. They are presented in Section 6 of the Design and Access Statement Addendum, and replicated with commentary in Section 9 of the Archaeological Assessment & Heritage Statement. To allow for the potentially more impactful views that could be experienced without tree cover in winter, a version of each with transparent trees have been provided. The views are not considered in numeric order below, and instead broadly consider views from positions around Reed Hall moving in a clockwise direction from the gardens to its south east.

Views 1, 4 & 5 are all taken from the gardens to the south east of Reed Hall. View 1 is taken from a historic 'Arbor' seating position designed intentionally to sit and take in the views. Within this view the new building will be clearly visible as a new intervention behind the Billiard room and with Mardon Hall as a backdrop. While officers agree that built form already exists as a backdrop, in view 5 in particular the new building will be seen immediately behind the billiard room (in reasonably close proximity), where previously the silhouette would have primarily been seen against trees and the sky. The heritage impacts of the proposal have been reduced in these views by reducing the footprint, height and mass of the building, but officers nonetheless consider that some residual harm will arise to setting of listed structures and to the park/garden in these views. The Conservation Officer considers the harm to the significance of Reed Hall's setting in this view to be less than substantial, and described it as 'moderate'.

View 6 was requested in order to consider the impacts on the setting of Mardon Hall when approaching it from the terraced Italianate gardens via the separately listed formal steps to its west. The agent asserts that this view is already compromised by the lower quality service extension already carried out to Reed Hall, as well as by mature trees and that the IAIS building already features as a backdrop to these views. Whilst these factors may be true, the IAIS building is reasonably distant in these views, and the topography is such that the site would always be seen as part of the rising land from this view.

Although it would feature only in glimpsed views between other buildings that are part of Reed Hall and between trees, it would be visible from several positions around the top of these Grade II listed steps, and would be very noticeable in these views due to its height and proximity. It will become more prominent in the glimpsed views where it is visible on the route towards the two courtyards serving Reed Hall to its north. Whilst the Conservation Officer considers the harm in this view to be less than substantial, they consider it to be at the higher end of this by virtue of the fact that its

impact will be on the setting of the principal elevation of the principal listed building, and that the impact is likely to be long-lasting in duration.

Although the focus has been on the northern of the two courtyards, as the southern courtyard has already been heavily compromised by the 1970s catering block extension, there will nevertheless be impacts due to the prominence of the building in this location. It is notable however that the impacts on the southern courtyard have been particularly reduced by the scheme redesign, as its footprint no longer extends so far south meaning that it will be less imposing on this courtyard.

It is the impacts on the Mews Courtyard that officers have been most concerned about throughout the scheme development. The most frequently experienced view will be that from the entrance to the courtyard shown in View 7 (this was the route to the Lit Path before the steps up to the site were closed during COVID), but the building will also be visible when moving between the southern courtyard and the Mews courtyard. The focus on this space reflects not only the fact that this is the position within the curtilage of Reed Hall from which the building will be most prominent, but also the fact that the courtyard surfacing, enclosing walls and buildings that enclose it are very well preserved. Although these buildings are more utilitarian in design and materiality than Reed Hall itself, reflecting the fact that they would have been working (stabling) buildings along with the productive garden above them, they nonetheless have a charm as well as preserving an understanding of the working parts of the estate. The small curved door leads into the vaulted area in which the furnace would have heated the greenhouses above (to be retained below the proposed building). Members will be able to see - from the inclusion in the presentation of the initially submitted proposal for comparison purposes - that the harm arising has been reduced through the negotiated redesign. Officers would have preferred the building to be further set back, and similar comments were made by the Design Review Panel, but there is no scope to do so within the scope of the University's brief. While the numerous amendments here have reduced the harm, officers consider that the building will result in a significant degree of residual harm to the setting of these (curtilage listed) buildings. The Urban Design and Landscape Officer requested that the divider position be adjusted to more sympathetically align with the building's composition and fenestration, but the design team does not consider it appropriate to do so, and considers that their alignment with the functions of the building is more important.

The Conservation Officer's comment is as follows: *The existing historic buildings of the stableyard will be dwarfed by the height and scale of the proposed building. Their setting will unavoidably altered, and the level of harm will be at the higher end of "less than substantial" harm – there will be no direct impact on historic fabric in the courtyard but the experience of the historic character of the space will be considerably altered, particularly when experienced from within the courtyard.*

As the harm is considered to remain 'less than substantial', public benefits can be weighed against it. However, the Conservation Officer's analysis of these impacts indicates that a significant level of public benefit will be needed to outweigh the harm.

Before turning to other views, it should be noted that further revisions have been negotiated to reduce harm to this courtyard: in the initially submitted scheme it was proposed to use this courtyard as the primary construction compound for the delivery of materials etc into the yard. To do so it would have been necessary to demolish parts of the listed enclosing walls for HGV access, and despite proposals for protective ground coverings the Conservation Officer was very concerned about damage to the cobbled/setts surfacing. The desire to avoid the disruption to Reed Hall's catering facilities that would arise from the use of the less sensitive southern courtyard was not considered by officers to be sufficient justification (as required by NPPF para 213). The University has now agreed to use the southern courtyard instead, and conditions are proposed to prevent its use for construction purposes (except in exceptional circumstances with prior written approval).

In view 8 the building will clearly be much more prominent than the curtilage listed potting sheds that it will replace due to its great scale. Whilst the design of the building's north elevation is very important in streetscape terms, and there has been significant discussion over the design of the building entrances here, it is not considered to be a view which gives rise to significant harm to the setting of the listed buildings. The north elevation of the mews buildings are utilitarian and comprised by their proximity to the Mardon Hill carriageway in any case. However, there are opportunities in this area to make improvements which will better reveal the special architectural and historic interest of existing buildings. For example, there may be an opportunity to improve the railings on top of the retaining wall, and to rationalise the plant and inappropriate changes that have been made to the gable end of the mews building in its lightwell to tidy up this area and better reveal the vault which is visible here from Mardon Hill close to the building's proposed entrance.

View 3 is also a position where the building will be seen addressing Mardon Hill. From this position, the level 02 entrance will be visible and the close relationship with the IAIS building will be apparent. As the agent acknowledges, there will be some harm in this view, as the building will block the views of Reed Hall set against the landscape of the Exe Valley in which it was designed to sit. It is true, however, that the more utilitarian parts of Reed Hall lie between this viewpoint and its towers, and as such it is not the most important view of the building itself. There will however be some loss in legibility of the site itself from positions in this area as the IAIS terrace currently allows for views down into the site where its cobbled paths, retaining potted sheds, and former glasshouse bases can still be seen.

Finally, whilst view 2 (from the former productive garden adjacent to the site) will be significantly altered, the view itself is not of particular importance. Although some views into the site itself will be lost, as will views of some parts of the mews stables

from some positions in this garden, they are not of particular significance. Following negotiated revisions, the building will have a more positive relationship with this 'park', including an informal access which would allow for informal spill out into the gardens from the large teaching space and lobby/breakout study areas at level 01. During the course of the application there has been significant discussion about how the legibility of this former productive walled garden could be improved. Historic maps and photographs show that it currently featured paths serving the glasshouses against its perimeter, as well as cruciform paths crossing the square garden. Over time, these have been lost and many trees have grown in the area giving it a more pleasant character. The southern enclosing wall has also been lost, allowing for the gardens to blend into this former working garden. The position of the building overlooking this area (including its terraced lower slopes) creates an opportunity for the space to be overlooked, and with it the possibilities of reinstating some memories of its former function and character. Whilst the sloping topography and tree positions make this challenging, some interventions to better reveal the significance of this area by allowing for its interpretation have been agreed. Overall therefore, whilst there is a degree of harm to this view, it is this relationship that creates the greatest opportunities to better reveal the historic character of this locally registered historic park and garden (which is understood to pre-date Reed Hall itself).

Linking to more general design considerations, officers consider the revised approach to materials to be positive. The use of reclaimed brick, and new brick in a similar colour palette is positive. The design approach has sought to take cues from the design approach of Reed Hall, acknowledging that it will serve as a bookend and a counterpoint to the main Italianate mansion at the northern extent of its range of buildings: whereas previously the building was to rely on significant expanses of concrete that were considered an overly austere and assertive material, concrete is now used to create a framework comparable to the stone lintels etc of Reed Hall, which frames the buff/cream brickwork (as at Reed Hall). The design has also been simplified as far as possible to focus on quality and avoid the creation of an overly complex and assertive structure. Furthermore, it is intended to construct the panels for the main elevations offsite. This modern method of construction will help to maintain quality of finish as well as helping to minimise carbon emissions. A suite of conditions are required to ensure that the finish is of sufficient quality for this highly sensitive location.

It has clearly been challenging for the building to reconcile the need to respect its historic/Victorian setting with the Islamic influences that align well with its intended use. However, officers now feel that the design achieves this delicate balance well. Officers feel that the landscaping immediately around the building achieves this particularly well: the new Courtyard Garden to be created to the south of the building is inspired by the traditions of both Persian and Italianate gardens, and its formal quadrilateral layout also subtly recalls the former productive garden that once occupied the former productive gardens adjacent. Whilst new features with strong Arabic influences, such as the central tiled water feature, and the fretwork dividing screens acknowledge these Islamic influences, reclaimed historic materials from the

site will also be reused in the hard landscaping and street furniture. The dividing screens will feature the pattern of Parthenocissus, a notable climbing plant from the Veitch catalogue.

In reducing the building footprint it has been possible to increase the outdoor spaces, and these are designed as outdoor rooms that spill out of the building. Whilst conditions are required to ensure a high quality execution, officers consider that these spaces are likely to be very well used spaces that ought to contribute to the building's success. The café at level 02 will also feature a significant outdoor terrace which will allow for impressive views of the landscape to the south and west (in the spirit of the terraced gardens laid out around Reed Hall).

The final design issue relates to the proposed new route through the former productive garden. Significant use of the garden as a transition space is already evidenced by the existence of various desire lines across the grass, in addition to the heavily used 'Lit Path'. Strong concerns about the initial proposal were raised by the Urban Design and Landscape Officer, and the Design Review Panel described it as 'unsympathetic in scale and character'. Officers felt that the slightly curved route through the spaces, which would have also required significant earthworks to achieve the necessary levels, would have respected neither the current intimate parkland character of the space nor that of its historic function as a productive garden.

The path has been the subject of much discussion, and officers have encouraged the design team to explore the partial restoration of the historic character of the former walled gardens (as was initially proposed at the outset of pre-application discussions) through the reintroduction of paths. Ultimately, it has not been possible to do so given the need to achieve an accessible route (less than 1:12) across this sloping site, whilst also avoiding the numerous attractive mature trees and their Root Protection Areas. A solution has, however been agreed in principle, and is presented as a concept in the document 'Reed Hall Gardens - Accessible Path (Post Planning Amendments)' submitted on 03 October. It has been agreed that the path should comprise of a straight path from the IAIS building reflecting the former working character of the garden, but that this should change in alignment and character where it crosses the line of the demolished southern garden wall. Whilst officers consider that some further design work is needed to finalise a design for this the design team and officers agree that it would be beneficial to create a small transition space here (including a bench) in which to dwell. This gives an opportunity to mark the alignment of the former wall, potentially by reinstating a very small section of brick wall associated with a bench seat or similar. An intervention of this type would subtly improve the legibility of the former garden. Final details of this will be secured through the condition that is recommended to secure the package of environmental benefits. Officers have also encouraged the University to alter the existing 'Lit Path' to replicate this character where this path also crosses the pre-existing historic wall. Together these two interventions would further increase legibility to better reveal the significance of the historic garden. Changes to the existing lighting which is of a poor quality utilitarian design are also encouraged to match lighting to the new path, the

design and installation of which will be secured by condition. Subject to the provision of lighting which adequately ensures student safety whilst not causing harm to the Bats that are known to use this area, the delivery of the path will significantly improve access for disabled persons and will weigh in favour of the scheme.

In order to try to conclude on design/heritage/landscape related matters on this challenging site, and following an intensive process of negotiating revisions, officers consider it helpful to return to the SPD to compare the proposals to its objectives for this area. In section 8.6.4 under the heading Reed Hall, the SPD states the following for this area:

'Objectives:

The existing character of Reed Hall and its landscape should be retained. No major development is proposed but smaller scale, sensitive development could be appropriate to replace the 1970s catering block to the rear of Reed Hall and the theatre workshop buildings to the north of Reed Hall.'

As set out above, the development will result in significant change to the character of the application site and the Mews buildings/courtyard, both of which form part of Reed Hall, and in doing so will also bring a degree of harm to its Landscape (former productive garden) and setting.

Potential for redevelopment

Smaller scale sensitive development could be appropriate to replace the 1970s catering block to the rear of Reed Hall and the theatre workshop buildings to the north of Reed Hall.

The development significant exceeds what would be considered 'smaller scale development' and will result in cumulative harm over and above that already caused by the 1970s catering block. The development is therefore not in accordance with the SPD in this respect.

Building Form

Any development in the vicinity of Reed Hall should be of exceptional design quality.

The design quality of the proposals has increased very significantly as a result of the recent redesign process, and subject to conditions the proposed development is now considered to be of high design quality.

New buildings should ensure that they have clear fronts and backs with entrances that overlook the key public spaces.

The layout/arrangement of the building has been a significant point of discussion, with the position and design of the main staircase being seen by the Urban Design and Landscape Officer as a cause for many of the challenges experienced in reconciling the design of the building on a site with such challenging topography (the design team have advised that the staircase must be enclosed for fire safety reasons). The consequence is that the central entrance on Mardon Hill – which one would usually expect to be the main entrance – is downplayed in design terms to try to indicate that it should not be used as a main entrance and is primarily for servicing (catering) purposes). Whilst the building does front both the former productive garden, and the new semi-public gardens that it will create positively, its elevation facing the adjacent street (Mardon Hill) is essentially the back of the building. Its main entrances are at the north western corner from Mardon Hill (level 00) and the eastern side from IAIS (level 02). Whilst the design team have worked hard to overcome these challenges and have ultimately managed to do so, overall the building will not be especially legible to new users.

Landscape & public realm

Open up and improve the spatial structure of the woodland.

The proposal does not impact on the woodland.

Botanical interest, Veitch landscape and Arboretum to be retained and enhanced.

The impacts on the Landscape beyond the productive garden are limited.

Potential for restoration / repair of the historic gardens including walled garden and Italian balustrades.

Officers would have liked to see more sensitive restoration of the former productive (walled) garden, and continue to negotiate the final design of the new path to minimise its landscape and heritage impacts and secure a degree of restoration. The potential to reopen and restore the terraces of the walled garden (south of the site between it and Reed Hall) is being discussed as a potential public benefit to offset heritage harm.

Creation of new square west of theatre workshops (Mardon Hill) to link Holland and Mardon Halls through Reed Hall to heart of Campus.

This objective is not achieved by the development.

Development of more direct pedestrian links between Holland & Mardon halls and heart of campus through IAIS / theatre workshops.

The new N-S route will achieve this objective, and subject to final detailed design to address outstanding landscape and heritage matters, will deliver a significant benefit in accessibility terms to this part of the campus.

In summary on design matters, the proposal is for a building of much greater scale than envisaged by the SPD, and although its design quality has improved significantly through negotiation and is now considered high it result in residual harm to the significance of heritage assets through both loss and harm to setting. In accordance with NPPF paragraph 215 officers consider public benefits to be necessary to outweigh this harm before approval can be justified.

5. Impacts on Trees, Ecology and Biodiversity Net Gain

The Tree Officer has confirmed that the works to trees are acceptable: although it is proposed to fell fourteen trees (eleven from the site itself, two to create the new path, and one to the north of Mardon Hill to allow for surface water drainage attenuation), none are of such amenity value that they would warrant protection by way of a TPO. The majority are classified as 'C', with the highest quality to be lost being category 'B2' (2x Crab Apple, 1x Sweet Gum, 1x Field Maple and 1x Cherry). In accordance with the Tree Officer advice, an informative is however proposed to encourage the translocation of younger tree specimens if possible (bearing in mind the size of the University campus which is such that opportunities for this are likely to be available). Some of the tree works initially proposed will no longer be required as a result of the relocation of the construction compound from the Mews Courtyard. Although there remains some scope to cause harm to trees from the works needed to create the new path through the former productive garden, these works are considered in the submitted Arboricultural reports which will be subject to a planning condition. The Tree Protection measures proposed are considered acceptable and will be conditioned, and the recommended condition ensures that works are carried out in accordance with the approved Arboricultural Method Statement (or in accordance with an alternative equivalents where this is submitted and approved).

The University Campus is designated by saved Local Plan Policy LS4 as a site of local interest for nature conservation. LS4 states that development which would harm such sites will only be permitted where (a) the need for it outweighs nature conservation considerations, and (b) the extent of any damaging impact is kept to a minimum and appropriate mitigation and compensatory measures are implemented.

The Ecological Impact Assessment identified use of buildings on the site as bat roosts for three different species of bat (Pipistrelle, Lesser Horseshoe and Greater Horseshoe). All bat species are European protected species (EPS) protected under the Conservation of Habitats and Species Regulations 2017.

A licence is therefore required from Natural England before the development can go ahead. The submitted report acknowledges this. Following a court ruling in 2009,

LPAs are required to give advance consideration to the three 'derogation tests' which Natural England will use to process a licence application before planning permission is granted. The tests are that:

- the activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
- there must be no satisfactory alternative; and
- favourable conservation status of the species must be maintained

Whilst there are no public health and safety reasons for the roosts to be lost, the LPA acknowledges the benefits of the proposals to the University and to the city. As discussed elsewhere in this report, officers also accept the need for a facility to be on this site due to its relationship with IAIS. As such, criterion (a) of LS4 is considered met, as is the second of the derogation tests. Finally, ecologists have not raised any concerns about impacts on the Conservation status of the species in question.

Critically, although the loss of roosts could be harmful to the site's nature conservation interest, the extent of damaging impacts can be limited in this case through the provision of appropriate mitigation and compensatory measures. As well as the measures proposed on the site itself, a standalone compensatory roost is also being provided. In order to prevent delays with the project this was subject to a separate planning application (see planning history), and the University have confirmed that the roost is already in place in the wooded area north of the IAIS building. They have further advised (verbally) that use of the roost by a bat has already been recorded. Despite this, officers consider a planning condition to be necessary to ensure that the building remains available for bat roosting as compensation for the loss that would be permitted through this application.

Ecologists recommend that all of the mitigation measures regarding roosting bats and nesting birds, and compensation measures for the destruction of on-site bat roosts, as well as the proposed enhancement measures for bats and birds on site are secure by condition so conditions to that effect are attached. The conditions have also been worded in order to encourage the advice from the RSPB (integrated Universal Swift boxes) to be taken on board. Subject to these conditions, officers consider that the relevant policies of the development plan, and the legal requirements relating to protected species will be met. It is also relevant to this site of local interest for nature conservation, that Biodiversity Net Gain is a statutory requirement for this development.

Amendments to the Environment Act 2021 and Town and Country Planning Act 1990 now make provision, through the approval of planning permission, for a mandatory 10% Biodiversity Net Gain when habitats are impacted within the site boundary. A Biodiversity Gain Plan is required under the statutory (deemed) condition attached to all permissions where BNG applies.

Paragraph 187 of the NPPF (2024) also sets out that decisions should contribute to and enhance the natural and local environment by, amongst others, d) minimising impacts on and providing net gains for biodiversity.

A metric and report have been submitted, and the planning permission, if granted, would be subject to the statutory biodiversity gain condition as it is a major development. The pre-development development biodiversity value of the on-Site habitat on the date of application is 0.74 units, and the value of the application site after the development will be only 0.52 units, with the remainder being purchased in the form of credits from an off-site habitat provider. As such, the on-line biodiversity value will reduce by 0.22 units (-29.52%).

Ecologists advising the LPA have queried whether it is possible to include more native habitat creation in place of urban vegetated habitats on-site, for example by creating mixed scrub or any feasible medium distinctiveness habitat on-site as post-development to reduce the amount of offsetting needed to deliver BNG through a 3rd party habitat bank. The applicant has submitted a statement in response. This states that:

- the building and landscape architecture respond carefully to this historic part of the campus, known for its historic significance related to the Veitch nursery, and the proposed species mix and structure pay homage to this important history
- introducing mixed native scrub along Mardon Hill (queried as a potential location for more native species) would have a high level of visual impact which would conflict with the design rationale.
- Species of the type that would address the ecologists comments (UoE refer to hawthorn, blackthorn, hazel, guelder-rose, and spindle) are deemed inappropriate due to the species being spikey and requiring regular pruning alongside this challenging stretch of road and therefore there are major concerns about the ongoing maintenance.

Having spent significant periods of time negotiating the landscaping scheme alongside the building design to seek to reconcile the many competing objectives of development on this heavily constrained site, officers accept that it would be challenging to deliver more native habitat on site and therefore accept the proposals as presented.

Biodiversity Net Gain is secured by way of a national planning condition, which was introduced through Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This does not need to be replicated on permissions locally, but is reflected in an informative.

The applicant will need to provide evidence of their purchase when applying to discharge the national Biodiversity Gain condition. Whilst the final amount will be determined when the applicant applies to discharge the condition, the submitted metric suggests that 0.29 additional units will be required to achieve the mandatory 10% BNG (total units 0.81).

In respect of the on-site habitat proposed, officers do consider the on-site habitat proposed to be 'significant'. This conclusion reflects the fact that the 0.52 units proposed do exceed the 0.5 unit threshold of local guidance provided by Devon and Dorset Councils. Other factors of relevance in the guidance include the degree to which the future on-site habitat will be medium or high distinctiveness (either retained or proposed new habitat). In this case, the urban trees and the proposed green roof do constitute medium distinctiveness habitat, and they will require maintenance in order that their biodiversity value will be maintained. Given the scale of the habitat proposed, however, officers consider that a planning condition (rather than a S106 agreement) will be sufficient to secure a Habitat Management and Monitoring Plan for this habitat as it will be relatively easy to monitor. Whilst a S106 agreement allows for the collection of fees for monitoring the habitat, officers consider that a regular monitoring report submitted by the University will be adequate in this case (officers suggest requesting a monitoring report every 5 years for the statutory 30 year period).

Finally, in respect of ecology matters, with reference to The Conservation of Habitats and Species Regulations 2017, this development has been screened in respect of the need for an Appropriate Assessment (AA) and given the nature and scale of the development it has been concluded that the proposal does not require an AA.

6. Sustainability (including Surface Water Drainage)

Sustainability is controlled through the adopted development plan by Core Strategy Policies CP13-15. The emerging local plan contains a suite of policies on sustainability matters under the heading 'Climate Change'. Whilst these are understandably more ambitious and as such more onerous, officers do not consider that the LPA can insist that developments meet these requirements until the policies have been through Examination and given support by the Planning Inspectorate acting for the Secretary of State. However, relevant policies will be referred to below in the interests of comparing this project to emerging standards.

It is also worth noting that the University adopted its own Design Guidance in 2021. The [Sustainable Design Guide \(SDG\)](#) explains that it '*has been developed in response to The Environment and Climate Emergency (E&CE) Policy Statement (agreed March 2022) that declared all campus activities and operations shall have a carbon net zero impact and/or result in environmental gain by 2030*'. The guide states '*This document is designed to cater for all Capital projects, with project teams encouraged to consider all carbon emissions associated with all scopes 1,2 and 3*'. It

also goes on to confirm that *'...projects will not be signed off if the design guide is not followed and a checklist process has been put in place to make sure this happens (throughout all RIBA design stages). If any derogations are required a full justification including the associated carbon and a life cycle costs assessment will be required to allow the university to make an informed decision'*.

Critically in respect of the assessment of University projects against the Councils Development Plan, it states that *'The University has now elected to promote the Passivhaus methodology to guide its projects and the design guidance in this document supports the delivery of the new framework change and summarises expectations'*. As a result of this, projects are not generally assessed under the BREEAM methodology/certification required by Core Strategy Policy CP15. Whilst this does give rise to some challenges, Passivhaus is a globally recognised and rigorous standard for high energy efficiency, indoor air quality and comfort. As such officers consider that this difference ought generally to give rise to more climate friendly outcomes.

CP13 requires that *'New development (either new build or conversion) with a floorspace of at least 1,000 square metres, or comprising ten or more dwellings, will be required to connect to any existing, or proposed, Decentralised Energy Network in the locality to bring forward low and zero carbon energy supply and distribution. Otherwise, it will be necessary to demonstrate that it would not be viable or feasible to do so.'*

There is no intention for the building to connect to the District Heat Network (DHN), despite the fact that the University is rolling out a network in conjunction with 1Energy. The University advises that this is because the heat network viability remains uncertain at present. However, the agent has confirmed that the plant has been future-proofed with the necessary ducting to enable a future connection to the DHN should this be a viable option. In their email dated 23 October 2025 they include a drawing extract which shows that a duct will be provided from the plant room close to the north western corner of the building into Mardon Hill. Subject to a condition securing this duct, and recognising that it is likely to be technically feasible to take heat from the DHN for use in the building as part of its proposed energy strategy, this is considered acceptable.

However, it is also relevant that CP13 goes on to say: *'...Where this is the case, alternative solutions that would result in the same or better carbon reduction must be explored and implemented, unless it can be demonstrated that they would not be viable or feasible'*

In this case, the energy strategy is to operate with a centralised mechanical ventilation system, which will recover heat from the extract air to preheat the incoming fresh air supply in colder periods, and use variable air volume (VAV) controls within the different spaces to optimise indoor air quality and thermal comfort

whilst reducing energy use. Heating and/or cooling for the system will be provided by roof mounted Air Source Heat Pumps (ASHP), with solar Photovoltaics (PV) generating electricity which will contribute to their electricity demand. The addendum states that the design of the proposed development is achieving >20% betterment of the latest Part L (Building Regulation) requirements.

CP14 requires that: 'New development (either new build or conversion) with a floorspace of at least 1,000 sq. metres... will be required to use decentralised and renewable or low carbon energy sources, to cut predicted CO₂ emissions by the equivalent of at least 10% over and above those required to meet the building regulations current at the time of building regulations approval, unless it can be demonstrated that it would not be viable or feasible to do so.'

Air Source Heat Pumps (ASHP) and solar PV are low carbon and renewable energy sources (respectively). The Addendum states that 'the PV system will allow export to the university network, with an estimated annual yield of 20.8 MWh. A minimum of 10% of predicted building CO₂ emissions will be offset by renewable energy generation, satisfying Policy CP14...'

Policy CP15 sets out more general sustainability requirements from development. It states:

Proposals for development are expected to demonstrate how sustainable design and construction methods will be incorporated. All development must be resilient to climate change (particularly summer overheating) and optimise energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials, and by using technologies that reduce carbon emissions... All non-domestic development will be required to achieve BREEAM... 'Excellent' standards from 2013. Non-domestic buildings are expected to be zero carbon from 2019.

The Sustainability Statement Addendum sets out the targets for the building in reasonable detail. It is being designed to target Passivhaus certification and will utilise low embodied carbon materials and off-site construction methods where feasible. Although it is not targeting BREEAM accreditation such that the CP15 requirement to achieve 'Excellent' will not be met, the addendum sets out where the design being pursued exceeds typical BREEAM requirements in accordance with the Exeter University Sustainability Design Guide (SDG) requirements (the majority of the themes exceed typical BREEAM requirements, with the exception of 'Waste' and 'Pollution', which are both in line with BREEAM requirements). The applicant has agreed to a condition that has been attached to previous permissions on the campus for the building to achieve Passivhaus certification in lieu of BREEAM Excellent, and this is attached in a slightly adapted form.

In respect of the requirement to be zero carbon, the building is deemed 'Net Zero Carbon ready'. Effectively this means that, by virtue of being an all-electric, low consumption building with renewable energy generation, the building will benefit from the continuous decarbonisation of the electricity grid in the UK and will operate as 'Net Zero' whenever the UK Grid operates as such.

Despite the fact that the development will not be connected to the District Energy Network or be certified BREEAM Excellent, officers consider the proposal to have very high environmental credentials. Comparing it against emerging policy it is apparent that the project will be heated by way of a heat pump (CC5), will feature around 12.5% coverage by solar (CC5 requests 40%), will address emerging policy CC6 by undergoing whole life carbon assessments at each design stage and contains many features of adaptive and resilient climate change design (CC7).

Subject to conditions securing construction in broad accordance with the submitted sustainability statement (as amended by the sustainability statement addendum) (or in accordance with an alternative strategy which will achieve similar climate benefits when compared to policies CP13-15, where this is first submitted to and approved in writing by the local planning authority), and to a Passivhaus condition, the scheme is considered acceptable in sustainability terms.

In respect of surface water drainage, a drainage strategy has been submitted. This sets out that surface water will be drained via the green roof and via permeable hard surfaces with perforated pipes below. Both of these features provide some attenuation. Surface water will then be directed under Mardon Hill, where attenuation crates will store water under the green space directly opposite to enable flows to be limited to a maximum of 2.5l/s. The system will ultimately drain to a combined sewer, but reflecting the drainage hierarchy referenced in their response by SWW, officers have encouraged the applicant to connect to a surface water drainage system which is higher up the hierarchy. The West Park scheme to the north west, for example, will drain (westwards) via a surface water drain, but the University advise that it could be challenging to link into this system due to congestion in parts of Mardon Hill, as well as contractual reasons resulting from the fact that West Park is being delivered by a third party. A technical appraisal which considers alternative options has therefore been submitted. This concludes that an attenuated connection to the combined sewer north of Mardon Hill remains the preferred option but sets out further investigations needed and allows for a strategy further up the hierarchy if feasible. The LLFA have recommended a condition which requests a full strategy and as such it would be possible to pursue alternative options if these are concluded to be feasible following further investigations. The highways request to prevent flows onto the highway has been added to this condition.

7. Amenity Impacts

As a result of the site's location at the north western side of the heart of the campus, it is located some distance away from residential uses. The closest is student accommodation within Mardon Hall, parts of which are 25-35m away to the north. Additional student accommodation will be sited around 50m west of the site (in place of the existing tennis courts) following the completion of the West Park development that is now under construction. However, there is no reason to suspect that the building would give rise to unacceptable amenity impacts. The plant proposed at roof level will be fully enclosed by a screen and this will limit noise outbreak as well as preventing a visual link to the accommodation. Environmental Health have requested a condition to manage this. Environmental Health have also requested a condition to secure a Construction and Demolition Environmental Management Plan which would be needed to manage construction stage impacts, including noise and dust.

Subject to these conditions, no objection is raised on amenity grounds.

8. Heritage and Planning Balance

NPPF paragraph 215 states: *Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

Officers conclude in this case that whilst harm to significance will arise, it is less than substantial and as such may be weighed by public benefits in accordance with paragraph 215.

The package of public benefits may be summarised into three categories as follows: Firstly it is clear that the investment will bring economic benefits to the University, and that in turn the development will deliver further economic benefits to the city and the region, helping to reinforce and enhance the numerous and significant economic and social benefits already arising from the presence of the University in the city. These benefits have been set out by the University in the document '[AQB Public Benefits Statement v1.7 11.09.25](#)' and are summarised elsewhere in this report. Whilst officers consider that these benefits are likely to be very significant, it is challenging to quantify these. Furthermore, while the academic vision and association with IAIS give significant confidence that the benefits will be very significant, the ('land use') planning system is not capable of ensuring that the occupation of the building will deliver any particular output, and therefore it could be argued that the weight to be given to the likely economic benefits associated with research income etc ought to be caveated (to be equivalent to any University teaching floorspace) for the purposes of weighing against heritage harm. Other economic benefits, such as those in construction jobs and supply chain are not subject to these uncertainties and can be afforded modest weight.

Secondly, the scheme itself will bring other public benefits: the creation of an accessible route through the former productive garden to improve campus accessibility for user with mobility challenges is the most obvious, but the creation of a café terrace with outstanding landscape views would be another.

Whilst recognising the significant benefits above, officers have considered it necessary to pursue further tangible benefits from the scheme that relate to its immediate setting within the curtilage of Reed Hall. There are a number of areas of the site and gardens that have been subject to inappropriate development in the past and/or are in need of restoration to ensure their long term optimum viable use. Such benefits also reflect the fact that, in securing a long term optimum viable use for the site itself, the development will bring additional pressure on its immediate environment through increased use. Officers have therefore sought to negotiate a package of restoration and enhancement measures which will help to better reveal the significance of Reed Hall and its associated gardens. This package was discussed with University as part of discussions about redesign, and the package offered by the University is discussed in their submitted document: [Al Qasimi – Heritage Enhancement Strategy](#). The package that officers consider necessary and intend to secure by condition, is summarised into the following work areas, and a similarly worded condition is recommended. The majority of these have been agreed by the University in their submission of 09 October, but officers have added some aspects below, and have minor revisions to wording in some cases to reflect the fact that consider stronger commitments are considered necessary on some elements of the work. Each is expected to conclude prior to occupation of the building unless otherwise stated/agreed.

1. The terraces at the southeast corner of the 18th century walled garden,
 - a. Removal/management of vegetation across the three terraced levels
 - b. Removal of existing barriers to accessing the lowest terrace level and re-instating the route through from the former Billiard room to the Lit Path steps adjacent the site
 - c. Installation of more appropriate fence/barrier (if required at all) to any unsafe sections of the terrace
 - d. Implement additional structural surveys of the unsafe wall sections and a costed plan for repair
 - e. LEMP to secure ongoing maintenance to prevent further deterioration through encroachment of vegetation
2. Restoration and reopening of the historic steps between the mews courtyard and the site
3. Improvements to the railings to Mardon Hill on the northwest side of the site to reduce their harm to the setting of the curtilage listed Mews buildings
4. Rationalisation/removal of plant and other equipment from the entrance to the vaults at the north facing gable of the stable mews. Notwithstanding the detail shown on approved plans, the scheme shall rationalise this area as far as possible, including removal/reduction/other improvement to the clad enclosure attached to the gable end (subject to feasibility)

5. Inclusion of a sensitively designed intervention as part of the proposed new footpath link where it crosses the demolished historic southern garden wall. As well as providing a resting point for users to dwell, the intervention should seek to improve the interpretation of the design of the former productive garden, most likely by reinstating a small section of historic wall.
6. Improvements to the existing Lit Path to match the intervention on the new path as far as possible, and to replace existing inappropriate lighting with lighting of a more suitable design
7. Further means of allowing for additional interpretation of the history of the gardens, which could include an interpretation board or similar in an appropriate position.
8. Restoration of northern arm of eastern steps/balustrade (east of Reed Hall)

These improvements are all considered to be necessary to ensure the ongoing preservation of the heritage assets and to better reveal their heritage significance in accordance with NPPF paragraph 219:

Local planning authorities should look for opportunities for new development ... within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

It is also worth noting that the campus SPD includes as one of its aspirations: 'Potential for restoration / repair of the historic gardens including walled garden and Italian balustrade'

Officers consider that these measures constitute public benefits and as such they may be weighed against the heritage harm arising from the proposal. Together with the economic benefits expected to arise from teaching and research activities in the new facility, time limited benefits such as construction and supply-chains jobs, and accessibility benefits brought by the new path, officers consider the public benefits of the proposal to be sufficient to outweigh the heritage harm arising.

17.0 Conclusion

In final conclusion, officers recognise the benefits of the proposal and the need for its adjacency to IAIS. Given the complexities of the site and the challenges with building on it, officers also accept that the University have a minimum floorspace requirement and functional requirements and that it is therefore not possible to reduce the building further. Together these factors provide the justification for loss and harm to heritage significance that is required by NPPF paragraph 213. Full, detailed recording is required, materials are to be reused where possible, and the wider package of environmental enhancements is expected to help mitigate heritage harm by aiding interpretation of the historic function and arrangement of the site. A condition is

necessary to satisfy NPPF paragraph 217 to ensure that demolition works go ahead only in association with the full redevelopment.

Whilst the building exceeds the scale envisaged by the SPD, following significant revisions the design quality is considered to be high. Despite this, officers conclude that harm to heritage significance will result from the loss of curtilage listed buildings/features on the site, as well as from harm to the setting of listed buildings. There will be harm to the setting of the Mews Courtyard buildings, to the setting of Reed Hall itself, and to the setting of Reed Hall's Italianate terraces/steps. Harm which is also expected to arise to the undesignated (locally registered) park/garden and has been considered against NPPF paragraph 216. Critically, however, officers conclude that the overall heritage harm falls firmly within the 'less than substantial' category, and as such it is to be weighed against the public benefits of the proposal in accordance with NPPF paragraph 215.

The functions that will be facilitated by the building itself will deliver significant economic and social benefits, and together with construction-related economic benefits, the accessibility benefits brought by the new path, and a package of other environmental/heritage restoration and improvements works, the public benefits overall are considered sufficient to outweigh the harm to the significance of the heritage assets that is expected to arise.

Subject to conditions securing the protected species mitigation, including that which is already in place (bat house), and statutory Biodiversity Net Gain (part on, part off-site), and to a suite of conditions to protect trees, amenity, and to ensure appropriate detailed design quality (including the reuse of reclaimed historic materials), officers consider it appropriate to recommend both the planning and the listed building consent application for approval.

18.0 Recommendation

Grant Planning Permission and Listed Building Consent subject to conditions as set out below.

Conditions 1 and 2: 25/0098/FUL:

1) 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.

2) The development hereby permitted shall be carried out in complete accordance with the approved plans listed below, unless modified by the other conditions of this consent:

Received 28th January 2025:

28/01/2025_DR-A-000150 P01 Existing P-SE3 Sections and Elevations - Proposed Removals

Received 11th September 2025:

123442-ATRL-01-XX-DG-A-080001_SITE LOCATION PLAN_P01

123442-ATRL-01-XX-DG-A-089001_EXISTING SITE PLAN - PROPOSED REMOVALS 1- 250_P01

123442-ATRL-01-XX-DG-A-089002_EXISTING SITE PLAN - PROPOSED REMOVALS 1-100_P01

123442-ATRL-01-XX-DG-A-089003_PNE1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089004_PNE2 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089005_PNW1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089006_PSE1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089007_PSE3 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089008_PSW1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089009_PSW2 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089010_PSW3 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-081000_PROPOSED SITE PLAN_P03

123442-ATRL-01-00-DG-A-081001_PROPOSED LEVEL 00 GENERAL ARRANGEMENT PLAN_P03

123442-ATRL-01-01-DG-A-081002_PROPOSED LEVEL 01 GENERAL ARRANGEMENT PLAN_P03

123442-ATRL-01-02-DG-A-081003_PROPOSED LEVEL 02 GENERAL ARRANGEMENT PLAN_P03.pdf

123442-ATRL-01-R1-DG-A-081004_PROPOSED ROOF LEVEL 1 GENERAL ARRANGEMENT PLAN_P03

123442-ATRL-01-R2-DG-A-081005_PROPOSED ROOF LEVEL 2 GENERAL ARRANGEMENT PLAN

123442-ATRL-01-B1-DG-A-081006_PROPOSED BASEMENT LEVEL GENERAL ARRANGEMENT PLAN_P02

123442-ATRL-01-XX-DG-A-082001_PROPOSED GENERAL ARRANGEMENT NE
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082002_PROPOSED GENERAL ARRANGEMENT NW
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082003_PROPOSED GENERAL ARRANGEMENT SE
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082004_PROPOSED GENERAL ARRANGEMENT SW
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082005_PROPOSED GENERAL ARRANGEMENT SE
SECTION-ELEVATION_P02
123442-ATRL-01-XX-DG-A-082006_PROPOSED GENERAL ARRANGEMENT SW2
ELEVATION_P02
123442-ATRL-01-XX-DG-A-083001_PROPOSED GENERAL ARRANGEMENT
SECTION 1_P03
123442-ATRL-01-XX-DG-A-083002_PROPOSED GENERAL ARRANGEMENT
SECTION 2_P03
123442-LDA-01-XX-DG-L-0001_Landscape General Arrangement Plan LEVEL 00 #
01 # 02_SHEET 1 OF 4_P05
123442-LDA-01-XX-DG-L-0002_Landscape General Arrangement Plan LEVEL 00 #
01 # 02_SHEET 2 OF 4_P05
123442-LDA-01-XX-DG-L-0003_Landscape General Arrangement Plan
ACCESSIBLE PATH_SHEET 3 OF 4_P05
123442-LDA-01-XX-DG-L-0004_Landscape General Arrangement Plan ROOF
LEVEL_SHEET 4 OF 4_P04
123442-LDA-01-XX-DG-L-0005_Landscape General Arrangement Overview
plan_P02
123442-LDA-01-XX-DG-L-0104_Tree Removal Plan_P03
DTS23.12039.5.AIA_Arboricultural Impact Assessment
DTS23.12039.5.AMS_Arboricultural Method Statement
DTS23.12039.5.TPP-2 Rev 4_Tree Protection Plan
DTS23.12039.5.TPP Rev 5_Tree Protection Plan
DTS24.14748.1.SCH - Schedule of (Tree) works

Received 23 October 2025:

Agent Email with Clarifications (including future District Heat Connection)

Received 30 October 2025:

123442-ATRL-01-XX-DG-A-82007 Planning Elevations AOD Mark-up

Reason: In order to ensure compliance with the approved drawings.

Conditions 1 and 2: 25/0099/LBC:

1) The works to which this listed building consent relate must be begun not later than the expiration of three years beginning with the date on which this consent is granted.

Reason: To comply with Section 18 of the Planning Listed Building and Conservation Areas Act 1990 as amended.

2) The development hereby permitted shall be carried out in complete accordance with the approved plans listed below, unless modified by the other conditions of this consent:

Received 28th January 2025:

28/01/2025_DR-A-000150 P01 Existing P-SE3 Sections and Elevations - Proposed Removals

Received 11th September 2025:

123442-ATRL-01-XX-DG-A-080001_SITE LOCATION PLAN_P01

123442-ATRL-01-XX-DG-A-089001_EXISTING SITE PLAN - PROPOSED REMOVALS 1- 250_P01

123442-ATRL-01-XX-DG-A-089002_EXISTING SITE PLAN - PROPOSED REMOVALS 1-100_P01

123442-ATRL-01-XX-DG-A-089003_PNE1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089004_PNE2 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089005_PNW1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089006_PSE1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089007_PSE3 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089008_PSW1 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089009_PSW2 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-089010_PSW3 SECTIONS AND ELEVATIONS - PROPOSED REMOVALS_P01

123442-ATRL-01-XX-DG-A-081000_PROPOSED SITE PLAN_P03

123442-ATRL-01-00-DG-A-081001_PROPOSED LEVEL 00 GENERAL ARRANGEMENT PLAN_P03

123442-ATRL-01-01-DG-A-081002_PROPOSED LEVEL 01 GENERAL ARRANGEMENT PLAN_P03

123442-ATRL-01-02-DG-A-081003_PROPOSED LEVEL 02 GENERAL ARRANGEMENT PLAN_P03.pdf

123442-ATRL-01-R1-DG-A-081004_PROPOSED ROOF LEVEL 1 GENERAL
ARRANGEMENT PLAN_P03
123442-ATRL-01-R2-DG-A-081005_PROPOSED ROOF LEVEL 2 GENERAL
ARRANGEMENT PLAN
123442-ATRL-01-B1-DG-A-081006_PROPOSED BASEMENT LEVEL GENERAL
ARRANGEMENT PLAN_P02
123442-ATRL-01-XX-DG-A-082001_PROPOSED GENERAL ARRANGEMENT NE
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082002_PROPOSED GENERAL ARRANGEMENT NW
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082003_PROPOSED GENERAL ARRANGEMENT SE
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082004_PROPOSED GENERAL ARRANGEMENT SW
ELEVATION_P03
123442-ATRL-01-XX-DG-A-082005_PROPOSED GENERAL ARRANGEMENT SE
SECTION-ELEVATION_P02
123442-ATRL-01-XX-DG-A-082006_PROPOSED GENERAL ARRANGEMENT SW2
ELEVATION_P02
123442-ATRL-01-XX-DG-A-083001_PROPOSED GENERAL ARRANGEMENT
SECTION 1_P03
123442-ATRL-01-XX-DG-A-083002_PROPOSED GENERAL ARRANGEMENT
SECTION 2_P03
123442-LDA-01-XX-DG-L-0001_Landscape General Arrangement Plan LEVEL 00 #
01 # 02_SHEET 1 OF 4_P05
123442-LDA-01-XX-DG-L-0002_Landscape General Arrangement Plan LEVEL 00 #
01 # 02_SHEET 2 OF 4_P05
123442-LDA-01-XX-DG-L-0003_Landscape General Arrangement Plan
ACCESSIBLE PATH_SHEET 3 OF 4_P05
123442-LDA-01-XX-DG-L-0004_Landscape General Arrangement Plan ROOF
LEVEL_SHEET 4 OF 4_P04
123442-LDA-01-XX-DG-L-0005_Landscape General Arrangement Overview
plan_P02

Reason: In order to ensure compliance with the approved drawings.

Conditions to be attached to both 25/0098/FUL & 25/0099/LBC:

3) ARCHAEOLOGY 1:

No development shall take place until the implementation of a programme of building recording and archaeological works has been secured in accordance with a written scheme of investigation (WSI), which has previously been submitted to and approved

in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme.

Reason: To ensure that an appropriate record is made of archaeological evidence that may be affected by the development, in accordance with saved Policy 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 archaeological works are agreed and implemented prior to any disturbance of archaeological deposits by the commencement of preparatory and/or construction works.

4) RECLAMATION AND REUSE OF EXISTING MATERIALS - PRIOR TO DEMOLITION

No demolition works shall be commenced until a strategy for the proposed reclamation of historic building materials from the site has been submitted to and approved in writing by the local planning authority. The strategy shall include:

- a) details of the materials to be retained for re use (which shall be in broad accordance with the demolition plans hereby approved),
- b) the method of demolition of structures expected to feature materials with potential for reclamation and reuse
- c) the method by which materials will be assessed for suitability for reuse, stored, cleaned and prepared for reuse

Reason: to preserve existing historic materials from the site as far as is possible in the interests of minimising harm to the significance of the heritage assets at the site.

5) DEMOLITION ONLY IN ASSOCIATION WITH REDEVELOPMENT

No demolition works shall be commenced until evidence of a contract for the construction of the replacement building has been submitted to and approved in writing by the Local Planning Authority.

Reason: In order to minimise the risk of demolition and site clearance works taking place independently of the wider redevelopment which provides a justification for loss of heritage assets and delivers public benefits weighed against the harm arising (in order to satisfy NPPF paragraphs 215-217).

6) METHOD STATEMENT CONDITION - VAULT

Prior to the commencement of any works of repair or strengthening of the existing vaulted structure a detailed schedule of works and method statement setting out full details of the proposed repair or structural intervention shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out only in full accordance with the approved schedule of works / method statement and shall be fully completed prior to the first occupation of the building. Details shall

include a full and detailed specification of all materials to be used in the works and plans and drawings as necessary to describe the proposed intervention.

Reason: To ensure that the structural integrity of the historic fabric is conserved and maintained in the interests of minimising harm to the Reed Hall's heritage significance.

7) CONSTRUCTION ENVIRONMENTAL (AND TRAFFIC) MANAGEMENT PLAN (CEMP)

No development (including ground works) or vegetation clearance works or demolition shall take place until a CEMP (or CEMPs) have been submitted to and approved in writing by the Local Planning Authority. The CEMP(s) shall describe the actions that will be taken to protect the amenity of people living and/or working nearby, to ensure highway (including pedestrian) safety, and to minimise disruption to movements in the locality. It shall include as a minimum, provisions for:

General/Highways:

- (a) The timetable of the works;
- (b) Construction working hours, which shall be limited to the hours of 8:00 to 18:00 Monday to Friday, 8:00 to 13:00 on Saturdays and shall occur at no times on Sundays or Bank Holidays.
- (c) Hours during which delivery and construction traffic will travel to and from the site, which shall be limited to the hours of 8:00 to 18:00 Monday to Friday, 8:00 to 13:00 on Saturdays and shall occur at no times on Sundays or Bank Holidays.
- (d) hours during which no construction traffic will be present at the site;
- (e) any road closures;
- (f) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (g) The proposed route of all construction traffic exceeding 7.5 tonnes.
- (h) The site access point(s) of all vehicles to the site during the construction phase
- (i) 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;
- (j) the compound/location(s) where all building materials, finished or unfinished products, parts, crates, packing materials, waste, and stockpiles of topsoil and sub soil will be stored during the demolition and construction phases, and where construction staff welfare facilities will be provided.
- (k) details of wheel washing facilities and obligations
- (l) Photographic evidence of the condition of adjacent public highway prior to commencement of any work;
- (m) the means of enclosure of the site during construction works (Hoardings are to be kept free of fly posting and graffiti).

- (n) Details of the amount and location of construction worker parking.
- (o) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site
- (p) details of any footpath diversions required, including alternative routes and signage

Environmental Protection Measures:

- (q) 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.
- (r) 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.
- (s) No driven piling without prior consent from the LPA.
- (t) A detailed proactive and reactive dust management plan, including details of quantitative monitoring of dust emissions.
- (u) No emissions of dust beyond the site boundary so as to cause harm to amenity of the locality.
- (v) No burning on site during construction or site preparation works.
- (w) 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.
- (x) Arrangements for communication and liaison with local residents, including regular letter drops and a dedicated contact number for complaints.
- (y) Details of how power will be provided to any compounds, storage areas, welfare and temporary parking facilities (use of a generator overnight will not normally be considered acceptable).
- (z) Details of any works needed to any historic structures (which may need separate Listed Building Consent).

The approved CEMP(s) shall be strictly adhered to throughout the construction period of the development, unless a specific temporary exemption/alteration has been agreed in writing by the LPA in advance.

Reason: To protect the amenity of the locality, especially for people living and/or working nearby, to ensure highway (including pedestrian) safety, to minimise disruption to movements in the locality, and to ensure that works required to manage construction activities preserve the special architectural and historic interest of the Grade II listed Reed Hall (including its curtilage listed structures).

8) TREE PROTECTION MEASURES

No materials shall be brought onto the site or any development commenced (including demolition works), until the developer has erected tree protection fencing in accordance with BS5837:2012 around all trees or shrubs to be retained, in

accordance with the approved Arboricultural Impact Assessment (AIA), Tree Protection Plans and Arboricultural Method Statement (AMS) (or in accordance with alternative equivalents where these have first been submitted to and been approved in writing by the Local Planning Authority). The developer shall maintain such fences to the satisfaction of the Local Planning Authority until all development the subject of this permission is completed, and in other respects all works shall be carried out only in accordance with the approved AIA and AMSs.

Reason: To ensure the protection of trees on and adjacent to the site during the carrying out of the development.

9) BIODIVERSITY NET GAIN - HABITAT MANAGEMENT AND MONITORING PLAN

The development shall not commence until a Habitat Management and Monitoring Plan for the on-site habitat (the HMMP), prepared in accordance with the Biodiversity Gain Plan required by the statutory biodiversity gain condition and including:

- (a) a non-technical summary;
 - (b) the roles and responsibilities of the people or organisation(s) delivering the [HMMP];
 - (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
 - (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
 - (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,
- has been submitted to, and approved in writing by, the local planning authority.

The on-site habitat specified in the approved HMMP shall thereafter be delivered and completed in accordance with the details approved by the Biodiversity Gain Plan prior to the occupation of the development hereby approved, or in accordance with an alternative timetable where this has first been agreed in writing by the Local Planning Authority.

The on-site habitat shall thereafter be managed and maintained in accordance with the approved HMMP for a period of 30 years from the completion of the development.

Monitoring reports shall thereafter be submitted to the local planning authority in writing for the 30 year period in accordance with the methodology and frequency specified in the approved HMMP.

Reason: To ensure that the on site habitat is secured such that the development delivers the required 10% biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act 1990.

10) CONTAMINATED LAND

The recommendations given in the Geoenvironmental Risk Assessment Technical Note, Dated 12 September 2024 of Ground Investigation Report Reference: 123442-ARUP-ZZ-ZZRP-G-000001 P01.1 - 25 November 2024 are to be adhered to:

- o Human Health Risk Assessment (Section 4);
- o Controlled Waters Risk Assessment (Section 5);
- o Waste Disposal (section 7)

The building(s) shall not be occupied until the recommendations detailed in the above Technical Note Sections have been implemented/adhered to and a remediation/verification statement submitted to the Local Planning Authority detailing how the recommendations were complied with, together with confirmation that no unacceptable risks remain.

Unsuspected Contamination:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for an investigation and risk assessment and, where necessary, a remediation strategy and verification plan detailing how this unsuspected contamination shall be dealt with.

Following completion of measures identified in any approved remediation strategy and verification plan and prior to occupation of any part of the permitted development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite, reflecting the fact that any unexpected contamination that is uncovered during remediation or other site works is dealt with appropriately.

11) SURFACE WATER DRAINAGE

No development hereby permitted shall commence until the following information has been submitted to and approved in writing by the Local Planning Authority:

- (a) A detailed drainage design based upon the approved Flood Risk Assessment and Drainage Strategy.
- (b) Detailed proposals for the management of surface water and silt runoff from the site during construction of the development hereby permitted.
- (c) Proposals for the adoption and maintenance of the permanent surface water drainage system.
- (d) A plan indicating how exceedance flows will be safely managed at the site.
- (e) If required, a detailed assessment of the condition and capacity of any existing surface water drainage system/watercourse/culvert that will be affected by the proposals. The assessment should identify and commit to, any repair and/or improvement works to secure the proper function of the surface water drainage receptor.
- (f) If required, evidence there is agreement in principle with the sewer/drain/watercourse owner to connect into their system.
- (g) Details to demonstrate that that no surface water will drain on to any County Highway

No building hereby permitted shall be occupied until the works have been approved and implemented in accordance with the details under (a) - (f) above.

Reason: The above conditions are required to ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in line with SuDS for Devon Guidance (2017) and national policies, including NPPF and PPG. The condition must be pre-commencement since it is essential that the proposed surface water drainage system is shown to be feasible before works begin to avoid redesign / unnecessary delays during construction when site layout is fixed.

12) ECOLOGICAL MITIGATION AND ENHANCEMENT

The development shall be implemented in full accordance with the mitigation and enhancement measures set out within the submitted Ecological Impact Assessment (Bats and Birds) (GE, 12 September 2025). For the sake of clarity, these include that no development shall take place or access to existing roosts prevented until the replacement bat roost consented by permission 24/1485/FUL has been constructed and made fully operational. The following ecological mitigation/enhancement measures shall be provided, in accordance with full details which shall first be submitted to and be approved in writing by the LPA, prior to the occupation of the building hereby approved.

- o 2no tree mounted bat boxes to be installed in the adjacent former productive walled garden (as recommended by submitted report)
- o 2no tree mounted bird boxes to be installed in the adjacent former productive walled garden (as recommended by submitted report)
- o 2no. integrated bee bricks to be installed as part of the new building (as recommended by submitted report)

- o No less than 5 integrated Universal Swift nesting boxes to be installed as part of the new building (as requested by the RSPB)

All ecological enhancement measures ecological mitigation/enhancement measures shall thereafter be retained in accordance with the approved details.

Reason: In order to ensure that protected species are prevented from harm and that ecological mitigation and enhancements are secured.

13) SUSTAINABILITY (INCLUDING PASSIVHAUS CERTIFICATION)

The development shall be designed and constructed in accordance with the details set out in the submitted Sustainability Statement (as amended by the Sustainability Statement Addendum received 12 September 2025) or in accordance with an alternative equivalent where this has first been submitted to and been approved in writing by the Local Planning Authority, including pursuing Passivhaus certification. Prior to occupation, or as soon as practicable thereafter, evidence of Passivhaus certification shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that the proposal is in accordance with the aims of Policies CP13-15 of the Adopted Core Strategy and in the interests of delivering sustainable development (recognising that the University has decided to pursue alternative sustainability standards to the BREEAM Excellent which is otherwise required by policy CP15).

14) DISTRICT HEAT NETWORK READINESS

The development hereby permitted shall be constructed to include ductwork (sufficient in size and specification to accommodate a District Heating connection) from Mardon Hill into the Mechanical Plant/ Dry Riser area as shown on drawing extract submitted by email on 23 October 2025. The ductwork shall thereafter be maintained in readiness for any future District Heat Network connection to the site.

Reason: In order to ensure that the building is District Heat ready as required by Core Strategy policy CP13.

15) WASTE MANAGEMENT PLAN

The development hereby approved shall be implemented (and thereafter operated) in full accordance with the approved Waste Management Plan set out on page 102 of the submitted Design and Access Statement Addendum Report received 11 September 2025 (within Part 8 of 8 reference 123442-ATRL-01-XX-RP-A-080010), or in accordance with an alternative equivalent where this has first been submitted to and been approved in writing by the Local Planning Authority in liaison with the Waste Planning Authority.

Reason: To minimise the amount of waste produced and promote sustainable methods of waste management in accordance with Policy W4 of the Devon Waste Plan and the Waste Management and Infrastructure Supplementary Planning Document.

16) NO USE OF MEWS COURTYARD FOR CONSTRUCTION PURPOSES

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), the cobbled 'mews' courtyard adjoining the site to its south west shall not be used for any purposes related to the construction of the development at any time, except where the full details of the intended use (including timetable) have first been submitted to and approved in writing by the Local Planning Authority.

Reason: to protect this part of the curtilage to the Grade II Reed Hall from harm which officers would expect to arise from its use as a construction compound in the interests of minimising harm to Reed Hall's heritage significance.

17) RECLAMATION AND REUSE OF EXISTING MATERIALS - PRIOR TO REUSE

No construction works above ground level (proposed level 00 finished floor level) shall be commenced until a strategy for reuse of reclaimed historic building materials from the site has been submitted to and approved in writing by the local planning authority. The strategy shall include:

- a) The quantities of materials reclaimed by type
- b) Proposals for reuse (with reference to design details subject to separate condition(s))
- c) Proposals for the storage (and/or alternative reuse) of excess reclaimed materials (if any), as well as proposals to address any shortfalls arising in particular types of reclaimed materials.

Reason: to optimise the reuse of reclaimed historic materials from the site in the interests of minimising harm to the significance of the heritage assets at the site.

18) DESIGN DETAILS - PROPOSED BUILDING

No construction works above ground level (proposed level 00 finished floor level) shall be commenced until large scale details of the building design have been submitted to and approved in writing by the Local Planning Authority. The details shall include key aspects of the construction which affect the external appearance of the building design (showing the typical articulation of parapets, copings, sills, drips, mouldings, the depth of reveals, special brickwork bonding, joints between elements/components of dissimilar materials, specialist metalwork and other fabrications, etc.) and shall highlight where any reclaimed historic materials are to be reused.

Reason: In order to ensure high quality building design and detailing to deliver a high quality building and to minimise harm to Reed Hall's heritage significance.

19) MATERIALS SAMPLES - PROPOSED BUILDING

No construction works above ground level (proposed level 00 finished floor level) shall be commenced until samples of the materials to be used in the building design have been approved in writing by the Local Planning Authority. Ideally, sample panel(s) shall be erected on site (accompanied by a written specification submitted to the Local Planning Authority) to enable the different materials to be viewed alongside each other. Sample panels of proposed brickwork (including reclaimed brick) shall illustrate the bond, mortar mix and mortar finish proposed.

Reason: In order to ensure high quality building design and detailing to deliver a high quality building and to minimise harm to Reed Hall's heritage significance.

20) HARD AND SOFT LANDSCAPING SCHEME

No construction works above ground level (proposed level 00 finished floor level) shall be commenced (unless an alternative timetable is agreed in writing by the Local Planning Authority) until a Detailed Landscaping Scheme for the site has been submitted to and been approved in writing by the Local Planning Authority. The scheme shall include details of all hard and soft landscaping.

Hard landscaping details shall include all boundary treatments and works to any new/revised retaining structures, and any street furniture, and shall highlight where any reclaimed historic materials are to be reused. Samples/sample panels may be required as necessary.

Soft landscaping details shall include details of tree and plant species, specifications, planting densities and methods of planting.

The hard landscaping shall be constructed as approved prior to the occupation/use of the development. The soft landscaping shall be planted in the first planting season following the occupation/use of the development or completion of the development, whichever is the sooner, or in earlier planting seasons wherever practicable, and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: In order to ensure high quality landscape design and detailing to deliver high quality spaces surrounding the building in accordance with Policy DG1 of the Exeter Local Plan First Review, and to minimise harm to Reed Hall's heritage significance.

21) PLANT NOISE

Prior to the installation of any new plant including Air Source Heat Pumps on the site, details of the plant shall be submitted to and approved in writing by the Local

Planning Authority. The details shall include location, design (including any compound), noise specification and cumulated noise rating assessment. The plant shall not exceed 5dB below the existing background noise level at the nearest receptor. 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).

Reason: To prevent noise pollution in the interests of preventing harm to sensitive receptors in the vicinity of the site.

22) HERITAGE AND ENVIRONMENTAL ENHANCEMENTS

The building shall not be occupied (unless an alternative timetable for the implementation/completion of specific measures has been submitted to and been approved in writing in advance by the Local Planning Authority) until the following restoration and enhancement measures have been carried out to the gardens and structures within Reed Hall's curtilage, in accordance with further details which shall first be submitted to and be approved in writing by the Local Planning Authority:

1. Works to the terraces at the southeastern corner of the 18th century former walled/productive garden, comprising of:
 - a. Removal/management of vegetation across the three terraced levels;
 - b. Removal of existing barriers to accessing the lowest terrace level and re-instating the route through from the former Billiard room to the Lit Path steps adjacent the site;
 - c. Installation of more appropriate fence/barrier (if required at all) to any unsafe sections of the terrace;
 - d. Implementation of additional structural surveys of the unsafe wall sections, and production of a costed and programmed plan for repair;
 - e. Submission of a Landscape Environment Management Plan (LEMP), which shall thereafter be implemented in perpetuity in accordance with the approval details to secure ongoing maintenance of this area to prevent further deterioration through encroachment of vegetation.
2. Restoration and reopening of the historic steps between the mews courtyard and the site.
3. Improvements to the railings to Mardon Hill on the northwest side of the site to reduce their harm to the setting of the curtilage listed Mews buildings.
4. Rationalisation/removal of plant and other equipment from the entrance to the vaults at the north facing gable of the stable mews. Notwithstanding the detail shown on plans hereby approved, the scheme shall rationalise the equipment in this area as far as possible, including removal/reduction/other improvement to the clad enclosure attached to the eastern gable end of the northern Mews building (subject to feasibility).

5. Inclusion of a sensitively designed intervention as part of the proposed new footpath link where it crosses the demolished historic southern garden wall. As well as providing a resting point for users to dwell, the intervention should seek to improve the interpretation of the design of the former productive garden, most likely by reinstating a small section of historic wall.

6. Improvements to the existing Lit Path to match the intervention on the new path as far as possible, and to replace existing inappropriate lighting with lighting of a more suitable design.

7. Further means of allowing for additional interpretation of the history of the gardens, which could include an interpretation board or similar in an appropriate position.

8. Restoration of damaged balustrade to the short arm extending northwards from the Grade II listed steps that lead eastwards from Reed Hall towards The Queens Drive (part of List Entry Number 1266950)

Reason: The development itself is considered to give rise to less than substantial harm to the significance of the Grade II Listed Reed Hall (including its gardens and setting). These works are considered necessary as public benefits associated with the proposal (in addition to those public benefits expected to be brought by the building itself) in order to outweigh the harm arising and allow the grant of planning permission and listed building consent.

23) ARCHAEOLOGY 2:

The development hereby permitted shall not be occupied/brought into use until a post investigation assessment has been submitted to and approved in writing by the Local Planning Authority, in accordance with the archaeological written scheme of investigation (WSI). The post investigation assessment shall provide details of the analysis, publication and dissemination of results, including archive deposition where applicable.

Reason: To accord with paragraph 218 of the National Planning Policy Framework (2024), which requires developers to record and advance understanding of the significance of heritage assets, and to ensure that the information gathered becomes publicly accessible.

24) CYCLE PARKING

The building hereby approved shall not be occupied until secure cycle parking facilities for building users has been provided in accordance with full details that shall first have been submitted to, and approved in writing by, the Local Planning Authority. The details shall be in broad accordance with those shown on the plans hereby approved, except that no less than 50% of the 14 spaces proposed shall be covered to provide weatherproofing for workplace users. Where Sheffield Stands are used, these should be positioned and spaced in accordance with the guidance set out within Devon County Council's Cycle Parking Design Guidance. Thereafter the

said cycle parking facilities shall be retained and kept clear for that purpose at all times.

Reason: To ensure that cycle parking is provided, in accordance with Exeter Local Plan Policy T3, the Sustainable Transport SPD (Adopted 2013), and Devon County Council's Cycle Parking Design Guidance referred to within the SPD.

25) EXTERNAL LIGHTING

The building hereby approved shall not be occupied until external artificial lighting has been installed in accordance with details which shall first have been submitted to and been approved in writing by the Local Planning Authority (including location, type and specification to include brightness and colour temperature). The details shall demonstrate how the lighting has been designed to minimise impacts on local amenity and wildlife (including isoline drawings of lighting levels and mitigation if necessary). The details shall include existing lighting where this is to be upgraded/replaced.

Reason: To ensure lighting is well designed to deliver a high-quality environment in which user safety is ensured (reference should be made to the consultation response from the Police Designing Out Crime Officer), harm to light averse bats known to use the site is prevented, and harm to Reed Hall's heritage significance is minimised.

26) SECURITY MEASURES

The building hereby approved shall not be occupied until security measures have been installed in accordance with details which shall first have been submitted to and been approved in writing by the Local Planning Authority.

Reason: To ensure the safety of users of the site taking into account comments made in the consultation response from the Police Designing Out Crime Officer.

27) LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

Prior to the first occupation or use of the development hereby permitted, a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall be prepared in accordance with the specifications in clause 11.1 of BS 42020:2013 (or any superseding British Standard) and shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five year period).

- g) Details of the body or organisation responsible for implementation of the plan.
- h) On-going monitoring and remedial measures for biodiversity features included in the LEMP.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(s) responsible for its delivery. Where it relates to soft-landscaping which contributes to on-site habitat for the purposes of calculating the Biodiversity Net Gain to be delivered by this development, the LEMP shall be consistent with the Habitat Management and Monitoring Plan approved as a requirement of the relevant condition attached to this permission.

All post-construction site management shall be undertaken in accordance with the LEMP.

Reason: In the interests of biodiversity and good design in accordance with Policy CP16 of the Core Strategy, Policies LS4 and DG1 of the Local Plan First Review.

28) BIODIVERSITY NET GAIN - COMPLETION OF ON-SITE HABITAT

Notice in writing shall be given to the Council when the on-site habitat approved as a requirement of the Biodiversity Gain Condition and as set out in the Habitat Management and Monitoring Plan (HMMP) have been completed.

Reason: To ensure that the on site habitat is secured such that the development delivers the required 10% biodiversity net gain in accordance with Schedule 7A of the Town and Country Planning Act 1990.

INFORMATIVES

1) POSITIVE AND PROACTIVE WORKING

In accordance with Paragraph 39 of the National Planning Policy Framework the Council has worked in a positive and pro-active way with the Applicant and has negotiated amendments to the application to enable the grant of planning permission.

2) POTENTIAL TREE TRANSLOCATIONS

Please note, before removing any trees to facilitate this development, that the Council's Tree Officer considers that some of the younger trees to be felled may be suitable for translocation. You are therefore encouraged to explore the possibility of translocation before felling any trees.

3) LISTED BUILDING CONSENT

Your attention is drawn to the fact that this planning permission relates to works to a building included on the Statutory List of Buildings of Architectural or Historic Interest (Grade II). These works also require listed building consent. In this case Listed

Building Consent has been given through concurrent application 25/0099/LBC. In the event that minor changes are required or that you are not sure whether the listed building consent covers particular works which become necessary during the implementation of this permission, you are advised to contact the planning case officer. Under no circumstances should work be undertaken without listed building consent as it is an offence under Section 9 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to carry out any works requiring listed building consent without first obtaining such consent.

4) BIODIVERSITY NET GAIN

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)", which is worded as follows:

'Development may not be begun unless:

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

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) such other matters as the Secretary of State may by regulations specify.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan would be Exeter City Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. However, based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Please note that the Local planning authority would consider the completion of development to be the date that the on-site habitat measures are completed as advised in the notification required by the condition attached to this permission.

Please also note that Exeter City Council would anticipate requiring a monitoring report every 5 years.