

10 December 2022

Dear Roger

Objection Re: Amended Plans for Planning Application 21/1014/FUL

Thank you for consulting with Exeter St James Community Trust (ESJCT / the Trust) over these revised proposals.

On behalf of the Trust I wish to draw attention to the document submitted by Exeter St James Forum in response to the original consultation over the proposals for this application, and reiterate the strong objections raised for the reasons set out in that response. The following comments are intended to add to and not replace that response.

The tweaking of the original plans has done little even to address the design concerns raised by the Forum, but it remains of immense concern within the local community that the proposal has been confirmed for use as student accommodation on this brownfield site such as Exeter St James Neighbourhood Plan (NP) Policy SD3 earmarks for '*affordable homes for local people or good quality private residential development*'.

This use is completely unacceptable and non-compliant with the NP as well as Local Plan H5b, mirroring the proposal for PBSA on the City Service Station site in Well Street (16/0603/03), which was refused by ECC. It is relevant, therefore, to point out that the Decision Notice for that application states:

The Local Planning Authority refuses planning permission for the above development for the following reason(s):-

1 The application site forms a significant part of an intact street (Well Street), which is characterised by traditional terraced and semi-detached properties. As such, the scale and function of the proposed development would therefore be contrary to, and would be prejudicial to the achievement of, the objectives as set out in Policy C2 (a) of the Exeter St James Neighbourhood Plan.

2 The use of the site for student housing would not be appropriate within the St James Ward as it would lead to a further concentration of this use in this particular area of the city, resulting in a further imbalance of population within the local community, contrary to Policy H5(b) of the Exeter Local Plan First Review 1995-2011.

We note the number of beds has been reduced from 28 / 29 to 26 in the revised proposals, but the NP defines any PBSA with 10 or more beds as large and hence Policy C2a is as relevant here as it was for the Well Street proposal. Howell Road is also an intact street characterised by traditional

terraced and semi-detached properties. There can be no doubt that *‘the scale and function of the proposed development would therefore be contrary to, and would be prejudicial to the achievement of, the objectives as set out in Policy C2(a) of the NP’*.

It is also the case that the second reason for refusal of application 16/0603/03, is even more applicable to this site in Howell Road; nothing has occurred to lessen the community imbalance since 2016, to the contrary it has considerably worsened, so it is logical to expect that the conclusion reached then by the LPA, will also be the decision reached regarding the current application.

The NP further built on the determination of the LPA demonstrated during the consultation prior to Article 4 Direction, to plan for the continuing sustainability of the community, with local residents, the University and the Students Guild all supporting the policies of the NP. Since then, however, student numbers have rocketed, with figures year on year far exceeding the predictions provided by the University to ECC.

Whilst it is appreciated that it has been unfair to expect the LPA to be able to plan effectively to accommodate the huge influx of students seeking to be accommodated, when the figures bear no relation to those predicted, the unfairness on the local residents of neighbourhoods adjacent to the campus, where the majority of students prefer to live, is felt far more intensely, as a lived-in experience that can only inadequately be imagined by those who live elsewhere.

While student numbers are so high that sustainability of thriving communities in the neighbourhoods adjacent to the campus is at serious risk, ECC must ensure the accommodation of our temporary student residents is spread across the City, so that positive impact of the vitality brought by a reasonable proportion of these young people may be experienced widely, and the serious negative impact that occurs where the proportion of temporary student to settled, local resident is above the nationally recognised tipping-point, is avoided. Strict compliance with existing planning policies that are designed to ensure adjustment towards acceptable community balance, must be maintained.

It would be a serious injustice, as well as a retrograde, reactive move, if respect for planning policies, introduced to address a perceived severe need over the past 15 years or so, should be disregarded in order to address the uncontrolled growth of the University and the financial incentives for developers to build student accommodation instead of the much-needed good quality and affordable accommodation required for those wishing to make St James their full-time, sole address. If the planning system is not robust enough to stand up for the communities being pushed relentlessly closer to the edge of sustainability, there will be grave questions to answer when there is no longer a settled population left that is able to sustain a community.

How would decisions that would further imbalance the community, square with the City's 2040 vision? It is worth repeating the point made in the Forum's response to the original consultation for this application:

'Whilst not a statutory planning document Liveable Exeter's vision is at the heart of what the city is seeking to achieve. Key to it is investment into communities and neighbourhoods as the key building block of the city. If the City Council is serious about Liveable Exeter it needs to start taking planning decisions that reflect what it is seeking to achieve, for example by providing new homes at the heart of communities such as St James which have been hollowed out by student housing over the past 2 decades. This application represents 'business as usual' planning rather than any positive step towards ensuring the sort of investment into communities of the type (the City Council) wants to see.'

The Trust notes ECC's Liveable Exeter initiative proudly claims:

'Exeter has a vision for growth as a connected city region consisting of thriving linked communities set within an exceptional environmental setting. This clear vision represents a commitment to strengthen neighbourhoods;'

On behalf of the community of St James, the Trust, appeals to the LPA to refuse this application and thereby demonstrate that the declared commitment to strengthen neighbourhoods is not simply rhetoric. It is vital that the reality of this commitment is shown while there remains a core of permanent residents still committed to the struggle towards achieving the NP's long term vision of a balanced and vibrant neighbourhood. It is a truism that a sustainable community depends on a settled community that exists and is willing and able to sustain itself. Planning decisions that would lead to further worsening of the existing severe community imbalance must not be allowed.

Kind regards

Robyn Connett

Chair

Exeter St James Community Trust