Trust commentary: application 23/1161/FUL

The site

Although the site has been used for many years as a <u>revenue-generating car park</u>, there is no evidence of any application, let alone permission for, a change of use from the original rear gardens of 67 and 69 Longbrook Street.

This location means the site is concealed from Longbrook Street, but is prominent within Old Park Road, to and from which access and egress is proposed.

The site is within the <u>Longbrook Conservation Area</u>. The important terrace including 67 and 69 Longbrook Street is recognised as comprising buildings that each make a positive contribution to the character of the area. These two properties at the end of the terrace are directly opposite the Grade II listed Harry Hem's Studio (now Harry's restaurant and Hem's Buildings), a visually distinctive building that makes a particularly positive contribution as a grand Victorian statement that helps to create a sense of place.

In 2005 the original Conservation Area was amended and Old Park Road was specifically included, with the recognition that the Victorian cottages are contemporary with the remainder of the Longbrook area and as a whole, make a positive contribution to the character of the area.

If the designation as a conservation area means anything, surely no proposal should be permitted unless it enhances the area, conserving not detracting from the special character?

Heritage Matters:

NP Heritage policy H1 states:

Development affecting heritage assets within St James must pay special regard to the need to conserve and enhance their settings and any special architectural or historic features of significance.

If you agree that this proposal neither enhances the setting or historic character of 'host' properties of 67 and 69 Longbrook Street, nor of Old Park Road, you may like to consider citing this policy as a reason for your objection.

Design Matters:

In conservation areas even higher standards of design should be demanded than elsewhere.

We suggest you consider the proposal in the light of the following design aspects included in Neighbourhood Plan's Design Policy 1 (NP D1), which requires overall that new development must respond to and integrate with the existing built environment and take opportunities available for improving the local character of the area.

Does this development achieve this, or does it fail to meet NP Design expectations? Would it represent over-development of the site and deny 67 and 69 Longbrook Street the garden space these properties should be afforded? Would it present as an overbearing development ruining the outlook from the rear of these properties, resulting forever in removing the chance of returning these properties as elegant, well-balanced high quality residences?

More specifically:

Does the design respect the scale and character of existing and surrounding buildings? If not, it fails to comply with NP D1a.

Does the proposal relate to established plot widths within the Longbrook Street terrace and Old Park Road, particularly where they establish a rhythm to the architecture? If not it fails NP D1c.

Community Balance Issue:

You may with good reason be concerned that the driver behind this application is the demand for more student accommodation, but objecting on the ground of worsening community balance may not be the most effective approach in this instance.

As the application is careful not to suggest in any way that the flats are expected to meet the demand for student accommodation, the planning officers, focused on objective facts and planning policy and ignoring speculation, are likely to conclude that as configured the proposed accommodation lends itself as homes for working people, single or couples, small families or retirees looking to downsize, and hence having the potential to *improve* community balance.

By all means express your grave concern that on this site the occupants of the flats would almost certainly be students, worsening the balance and contrary to the key aim of the NP, but for the reason above, we strongly suggest you do not confine your objection to community balance which the officers may well dismiss. It is important to provide them with one or more reasons that avoid speculation, however wise, instead stating reasons which stand up better to scrutiny as being contrary to planning policy and which can't be dismissed so easily. The design and / or heritage issues offer suitable examples.

The most important point to remember is that each response that is submitted, either via the online planning portal, or by email to <u>zulema.nakata@exeter.gov.uk</u> copied to <u>consultations@exeter.gov.uk</u>, will be counted, and the more responses submitted that are clearly objections (always wise to label your response 'Objection'), however much or little you choose to write, the more likely our ward councillors will be able to push for the matter to be decided by Planning Committee should officers be minded to use their delegated powers to grant consent.

Deadline for responses - midnight on Sunday 29 October.