

Victoria Street Co-living: further information and commentary

Formal refusal of application [23/0949/FUL](#) for a 101 bed co-living development had seemed inevitable in the light of the overwhelming and unequivocal objections, not just by local residents and Exeter St James Community Trust, but by other bodies including Exeter Civic Society, the Police and perhaps especially by the Council's own planning officer with specific expertise and role as the Urban Design and Landscape Officer.

However, it was never expected that this would be the last we would hear of the matter; it was anticipated that the applicant would appeal and, if the Inspector were to uphold the refusal decision, submit a brand new application, hopefully for a much more appropriate scheme. In this regard, the following comments taken from the [response](#) of the Council's Urban Design and Landscape Officer might have seemed sensible for the applicant to consider:

'we have identified many concerns and the optimum use of this brownfield site is likely to be found by exploring a different type of residential development that can more successfully respond to the many constraints'

'Residential use is not contentious on this site although the proposals for a co-living form of development is not certainly proven to be feasible, nor demonstrated to be a suitable type in this location – as evidenced by the other points noted here.'

'Perhaps an apartment typology with external shared amenity space and some dedicated parking could begin to generate a more feasible brief for this site.'

He concluded: *'the project represents a poor response to the context and setting and has many other design failings – therefore we must OBJECT to the application.'*

Devon and Cornwall Constabulary 'Designing Out Crime' Officer raised serious concerns regarding safety, anti social behaviour and specific issues he anticipated with the co-living model. He has already [responded](#) to the revised proposals and his position has not changed.

Now 6 months after the published deadline for a decision, the planning officer colleagues of the Urban Design and Landscape Officer have, inexplicably in our view, further postponed the determination, and have accepted revised plans without requiring submission of a brand new application even though the new proposal no longer conforms to the unrevised application description (the number of studios has reduced from 101 to 89 – still potentially 178 occupants!)

The revised documents attempt to overcome some issues of unacceptable design raised by officers but, in our view, this tinkering doesn't alter the fact that the density and massing of the resulting built form would still be wholly out of character with the existing area. Moreover, there is silence on the many concerns raised about the proposed use as co-living. Still no consideration has been given to any other typology, whereas there is further implicit convincing evidence in the new documents that students are envisaged as the principal, if not exclusive, occupants. It would be tantamount to purpose-built student accommodation.

Confusion over consultation end-date

When the Trust was notified as a consultee on 2 April that revised plans would soon be available to view, we were invited to send in any further comments *'by 19 April at the latest'*. Assurance was subsequently obtained that *all* who had submitted responses would be alerted and invited to

comment, and once the documents had been made accessible [online](#), it was noted that this date may have been extended accordingly.

A date for advertisement in the local press had been set for 11 April, but also, confusingly two differing expiry dates were given – 30 April and 5 May! When we asked the case officer for clarification we were told that the re-consultation had indeed been extended '*to allow for letters to be sent out and responses received*' but which of the two later expiry dates would apply remained to be confirmed.

On 11 April a letter was finally emailed out to previous respondents as promised, but these set 25 April as the deadline for comments! The re-consultation was advertised the same day in the Council's '*weekly list*', advising that comments should be submitted '*before the Expiry Date shown on the 'Important Dates' screen*' on the application's website page; here the two previously noted dates, 30 Apr and 5 May, remain! With this confusion it would seem that comments will have to be accepted until the furthest date, 5 May. We shall continue to seek clarification and post this on the website as soon as finally agreed and confirmed.

All Members are urged to respond in defence of the Neighbourhood Plan which was created to protect St James from inappropriate development of poor design and which would not help to create the balanced and sustainable community.

We would like to encourage all Trust Members to use this new window of opportunity to make their views count on this highly significant application for St James, whether or not they submitted an individual response last August / September.

The importance of this can't be over-estimated; we mustn't allow the frustration we all feel at the developer's continuing contemptuous disregard for local residents' views and the serious and valid public objections, to lead us to throw in the towel. Remember that the total number of individual responses is always significant and those which comprise a single sentence explaining one aspect of concern and are clearly marked 'objection', are counted in the same way as the very helpful more detailed responses others may have time and inclination to submit.

Let's ensure it is impossible for neither the developer nor planning officers to conclude that opposition is falling away, as they might fewer than the original 130 responses are submitted this time round!

Responses can be made online following the instructions from the planning application [comments page](#), or sent by email to christopher.cummings@exeter.gov.uk. For good measure you may like to cc planning@exeter.gov.uk

Examples of Unresolved Concerns

We suggest that the following matters are amongst the many valid planning concerns that remain unresolved; you may have other pressing reasons to object, but, if you want to object but are not sure what to focus on, you may like to consider these suggestions. A sentence mentioning one or more that particularly concern you, would suffice for your individual response. Make sure you stress you are objecting – unless, of course, you have decided you wish to support the proposal!

Use

- Co-living use with its focus, according to the architect's description in the Design and Access Statement, of '*catering for the mobile generation*', is not what St James needs – the

Neighbourhood Plan (NP) aims ‘*to make St James a neighbourhood where people of all ages are confident to invest in for the long term, rebalancing the community*’.

- The *intended*, as opposed to *proposed* use, primarily as student accommodation, is made clear by many references in documents commissioned, approved and submitted on behalf of the applicant, to students.

For example:

- the Transport Statement states ‘*There will be no parking for residents on site (in line with university policy)*’, health and leisure facilities are available nearby ‘*on campus*’, and that ‘*It is envisaged that a move in / out strategy akin to the City’s student residences will be conditioned for approval prior to occupation*’.
- The Townscape Analysis actually identifies planning policies of relevance to the proposal, the majority of which relate to student accommodation, including NP Community Policy C2: Large-scale Purpose Built Student Accommodation.

Design

- **Mass and scale** of the proposal remains completely out of character within the site’s residential setting.
- **Overbearing and oppressive outlook for neighbouring properties.** The outward-facing walls on north east (Prospect Park) and north west (Culverland Road) elevations (attempting to meet technical requirements for neighbours’ privacy) are windowless – blank walls presenting a disagreeably overbearing and oppressive outlook.
- **Unacceptable impact of light reduction on neighbouring properties.**

Although the study commissioned to support the application identified that light levels currently experienced by a handful of neighbouring properties would be reduced to aa level below the desired minimum according to RICS guidelines, the conclusion was that such instances are to be expected and that overall the impact is satisfactory in order that the density of the proposed development to ensure the most efficient use of the site.

Would the applicant be happy to accept this conclusion if his living room happened to be one where the reduction of light fell into the high impact classification as is the case with one of the adversely impacted properties? Would you?

- ‘**Active frontage**’ of the main entrance block.

The proposed 4 storey South Block, a looming presence over the modest 2 storey properties on narrow, one-way, South Lawn Terrace and adjacent properties around the corner in Victoria Street, is now more clearly defined as the main entrance / exit for the entire development not only for pedestrians but for the anticipated 160 resident cyclists (clearly the plan is to permit double occupancy of the 89 rooms).

In addition to the main entrance, a 45sqm ‘amenity space’ is now proposed in this block at street level with two glazed double-doors opening directly onto a small paved area contrasting with the adjoining the public realm, and extending a short distance down South View Terrace apparently providing a further amenity space. (see below)



Outdoor amenity area outside the pair of double glass doors of internal amenity space on ground floor of South Block, inviting private parties to spill out and linger, with likelihood of noise disturbance and not just for immediate neighbours.

It borders the railway cutting renowned for amplifying sound and deflecting it far from the source.

The two rooftop amenity spaces seen in this visual, would similarly be a likely cause of noise nuisance as a result of proximity to the railway.

Although such an active frontage might seem far more appropriate when considered from the perspective as a welcoming main entrance to the large accommodation block, how appropriate is it when considered in relation to its setting at the corner of two narrow residential streets?

The pair of double glass doors would serve to encourage gatherings inside to spill outside, and as the majority of St James' residents are painfully aware, many socialising students seem unable to moderate the volume of their voices, laughter, screams, singing, swearing and shouts whether during a summer's day, or in the evening / night, even till 5am.

Traffic and Parking

- **Traffic generation**

The Transport Statement makes the extraordinary claim at 4.6. that '*It is noted that resultant of the development proposals, traffic generation associated with the site will, to the benefit of highway safety be reduced to nothing*'.

Is this credible? The site may be designated 'car free', but even if the residents respected this, ask any white-van type courier about the number of deliveries to student accommodation, and they will confirm the very high volume. Similarly the moped, cycle or van deliveries of ready-prepared meals are frequently to be seen delivering to the generation of students and other transient residents.

Taxis are also frequently observed collecting or depositing their fares outside all forms of student accommodation – no doubt even more by those who do not have access to their own car.

The revised documents explain that white-van type deliveries may be made on site, via the Victoria Street entrance, though larger deliveries will be at the roadside. This is likely to result in considerable congestion with passing impossible.

The arrangements for the refuse lorry have been revised as shown by tracking diagram, so that it will now drive down Victoria Street, just past the vehicular entrance at the rear of the

Culverland Road properties, before reversing into this entrance, and exiting in forward gear after collecting the waste.

An emergency fire appliance is able to drive further into the site and further tracking shows that it would be able to turn on-site.

- **Unsuitability of local streets**

The constraints associated with the narrow residential streets, many in the vicinity of the site heavily-parked on both sides, or just one if this is all that the width allows, characterised by tight junctions sometimes separated only by short lengths of road, present considerable difficulties.

Initially construction vehicles as well as the large vehicles that would be required to service the completed development, including the refuse lorry and emergency fire appliances, would struggle, and as tracking indicates, on-street parking would not be possible in the vicinity of the vehicular entrance.

- **Loss of high demand on-street residents' and limited parking bays**

The application's Design and Access Statement explains that '*Any fire engine needing access to the site can enter either from the north via Culverland Road or from the south east via South View Terrace*'.

This second option would only be possible if fire engines were made exempt from the current one-way system, and as even the desperate measure of shunting the parked cars would not make way for the appliance, as the cars, piled up against the houses, would continue to prevent passage, the residents' and limited on-street parking bays would have to be removed along the entire length and around the corner onto Victoria Street, completing the loss of bays up to the junction with Culverland Road.

The lack of transparency regarding removal of existing parking space is troubling. The applicant must have realised that such a measure would face fierce opposition from all who hold a Resident's Parking permit for Zone G, but as the development is shown to be reliant upon this, is he presuming approval of the necessary Traffic Regulation Order is a foregone conclusion should planning permission be granted?

With some 1400 eligible properties in Zone G, each with an allocation of up to two permits available to purchase, the applicant should expect the TRO to be met with enormous opposition if this application were to be approved!

Complete disregard by the applicant / agent for the views of local residents

The applicant and agent chose from the outset not to consult in any meaningful way with those who live in the immediate vicinity of the site and now the agent's letter submitted with the revised documents pointedly omits any reference to the consultation responses submitted by the local residents, resident associations and the Trust, explaining only that '*The changes now proposed are intended to address the Council's specific concerns as well as a number of technical comments made by consultees to the scheme.*'

Consultation with owners and residents of adjacent properties is an explicit expectation of Neighbourhood Plan Policy SD3. Not only has the applicant failed in this regard, but the revised

proposals that have been submitted are clearly still contrary to clauses a) and c) of this policy as indicated below in bold.

The preamble and policy wording of SD3: Infill / Windfall Sites state:

*St James has few opportunities for large scale housing development. However throughout the ward there are a number of small infill sites or sites that may arise due to the closure of commercial uses that may be suitable for development. **Proposals should be informed by consultation with the owners and residents of adjacent properties. The community will support the development of such sites for affordable homes for local people or good quality private residential development.***

SD3: Infill / Windfall Sites

*Proposals to develop small infill/windfall sites for **affordable homes for local people or good quality private residential development** will be supported where they:*

a) have a scale and form which would be complementary to surrounding properties and would not result in the loss of amenity for existing residents;

b) would achieve high standards of sustainable and low carbon design;

c) would be accompanied by appropriate provisions for parking, access and storage of waste

The Trust expects that this application will be taken to Planning Committee for the final decision and this is one policy reason on which grounds the Trust will urge Members to refuse the application.