



Historic England

Mr Matthew Diamond
Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1NN

Direct Dial: 0117 975 0725

Our ref: P01128814

18 September 2020

Dear Mr Diamond

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**THE HARLEQUIN CENTRE, PAUL STREET, EXETER, DEVON, EX4 3TT
Application No. 19/1556/FUL**

Thank you for your letter of 2 September 2020 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

As a result of positive engagement with the council and the applicant since we last advised on this scheme, additional information has been submitted that answered our outstanding queries regarding the archaeological remains within the Area of Archaeological Importance. We are now able to confirm that if appropriate conditions applied to ensure that a programme of targeted archaeological work would be conducted in the event the scheme were to be granted permission by the council, this would satisfactorily address our remaining concerns.

The Proposal

The proposal is for the replacement of the current Harlequin Centre, a low rise 1980s shopping centre, with two substantial blocks that will provide co-living accommodation and a hotel with bar and restaurant facilities.

As stated in our previous advice Historic England recognises that the Harlequin Centre is an important city centre site which presents a major opportunity for redevelopment. We have explained why the site and its surroundings are key components of Exeter's historic environment, a valuable and finite resource.

Area of Archaeological Importance



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Since we last advised the council on this scheme we have had opportunity to discuss our remaining concerns with both the council and the applicant. We have welcomed the applicant's wish to engage with our advice regarding the belowground archaeological remains on the site. Their continued engagement with us has allowed us and the council to gain a better understanding of the sequence of events that will affect the Area of Archaeological Importance which also forms part of the setting of the scheduled city wall. This has enabled us to advise further in relation to these issues.

Historic England provided comprehensive responses to the application on the 19 December 2019, 22 June and 28 August 2020. In our last letter we requested a series of additional technical information to be provided in order to clarify outstanding questions about the below ground archaeological remains on the site.

The following documents were provided in response to our letter of 28 August 2020:
Preliminary Geoenvironmental and Geotechnical Assessment (July 2019, Tweedie Evans Consulting)
Geoenvironmental assessment (February 2020, Tweedie Evans Consulting)
Letter from Terrafirma on the 25 January 2018, regarding Preliminary Geotechnical Ground Investigation: Harlequin Centre, Exeter.

Historic England's Position

Submission of the additional information has clarified the extent and date of geotechnical investigation works undertaken which we had previously queried. The new reports submitted confirm Historic England's view that additional targeted archaeological work will be required in order to inform the detailed design (and approval thereof) of the foundations for the new buildings in the event consent for this scheme is granted.

However we remain of the opinion that this work could be secured through a suitably worded pre-commencement condition drafted in consultation with your heritage specialist. We would recommend that this allow for the conclusions of the conceptual model to be tested and to directly inform the detailed design of the scheme. Our advice remains that this can be achieved through a stepped approach as follows -

Geoarchaeological Desk Based Assessment undertaken by a suitably qualified and experienced Geoarchaeologist, drawing on the existing archive review, existing borehole data and the recent Geoenvironmental and Geotechnical Survey results. This will enable the identification of areas to sample to refine the desk based deposit model;

Geoarchaeological borehole survey across the site with geoarchaeologist in attendance and contingency for sampling if appropriate;

Reporting and integration of new results into a geoarchaeological deposit model using appropriate software in accordance with Historic England guidance.



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We would welcome the opportunity to have a joint conversation with the city's heritage specialists about how the programme of archaeological work could be managed such as in relation to the detailing of a written scheme of investigation (WSI), in order to satisfy the requirements of the NPPF as well as following Historic England's published Piling and Archaeology (2019) and Preserving Archaeological Remains (2016) guidance.

Consequently, provided appropriate conditions to ensure that the above work is undertaken post consent, Historic England would be able to remove our outstanding concerns in respect of the impact of the proposals on the area of archaeological importance.

Recommendation

Historic England previously advised that we had concerns regarding the application on heritage grounds. At this stage, following productive discussions with the applicant and the council these have largely been addressed to our satisfaction. The remaining issues would, in our view, be addressed if appropriate safeguards, including as outlined above and in our previous responses, are put in place and secured by the council through the planning process. On this basis we would be satisfied that our concerns have been addressed.

We consider that it is now for the council to determine the application in line with national legislation as well as national and local planning policy. In so doing, the council should give great weight to any affected heritage asset (NPPF, Para 193,). Any harm should be weighed against the public benefits offered by the scheme (NPPF, Para 196). The council should ensure that any archaeological remains associated with the Area of Archaeological Importance should be appropriately treated (NPPF, Para 199) and the proposed works to enhance the Roman City Wall are secured (NPPF, Para 200).

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Rhiannon Rhys

Inspector of Historic Buildings and Areas

E-mail: Rhiannon.Rhys@HistoricEngland.org.uk



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Historic England

cc:

Andy Pye, Exeter City Council

Owen Cambridge, Exeter City Council



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