



Historic England

Mr Matthew Diamond
Exeter City Council - City Development
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Direct Dial: 0117 975 0725

Our ref: L01466073

23 August 2022

Dear Mr Diamond

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ROYAL CLARENCE HOTEL, CATHEDRAL YARD, EXETER, DEVON, EX1 1HD
Application Nos 22/0237/LBC & 22/0236/FUL**

Thank you for your letters of 2 August 2022 regarding further information on the above applications for listed building consent and planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the applications.

Historic England Advice

Historic England has provided a comprehensive response on the proposal for the regeneration of the former Royal Clarence Hotel site in our letter dated the 25 March 2022. This letter should be read and considered in conjunction with our previous correspondence, as some of the points remain extant. The response also includes a detailed assessment of significance.

Within the letter, we set out that although Historic England strongly supported the principle of the sensitive redevelopment of the site, without the requested further information we were not in a position to endorse the scheme.

These aspects of work related primarily to the justified for the loss of No. 6 Martin Lanes and the further details in respect of the structural works to the Well House and steel frame. However, there are also aspects of design that could be improved to assist in the presentation of the building overall.

Additional information has been provided in response of these proposals and we would like to provide the following advice to assist the council in their determination of the application.



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Demolition of No. 6 Martin's Lane

The Supplementary Planning and Heritage Statement (Avalon, July 2022) provides a more robust and balanced assessment regarding the loss of No. 6 Martin Lane. This recognises the loss of the building will result in a high level of harm; however, it balances that harm against the opportunities and wider benefits brought forward by the scheme in terms of reducing the scale and mass, allowing the scheme to more sensitively respond to its surroundings.

We would concur that the loss of No. 6 Martin Lane would result in considerable harm to the significance of the complex. However, as shown through the various alternatives presented within the report, the loss of the building allows for the new development to have a more sensitive silhouette, responding to the surrounding historic townscape that includes numerous highly graded heritage assets including the cathedral. The site is also open to the elements, showing signs of decline as well as facing a number of challenging constraints, and it is recognised that the proposed scheme offers a pragmatic solution for its regeneration.

If the council is minded to approve the scheme then they should seek a detailed method statement for the demolition of the site to ensure that suitable safeguards are in place to protect the other buildings on site.

New steel frame in the main section of the site

Although the submitted Structural Assessment Report (X Consulting Engineering - July 2022), provides broad comments on how the works will be undertaken as well as some details. Historic England is not averse to the principle of a steel frame but would highlight that this is a particularly important as the site does fall within Exeter's Area of Archaeological Importance. Therefore, we would strongly encourage the re-use of the existing foundations throughout the project in order to minimise the impact on the below ground archaeology including the medieval basements that survives.

Any discussion regarding new piles as well as changes to the existing piles, should be undertaken through consultation with the council's own heritage specialist and be secured through a suitably worded condition.

Structural repairs to the Well House

The Well House is the most intact aspect of the site and therefore the treatment of the structural works should differ from the approach sought on the rest of the site. It is disappointing following our previous advice that detailed drawings have not been provided to support the proposals set out within the report as well as consideration given to the points raised in our previous response.





With that in mind, the following points remain extant -

- Clarity on whether a steel frame is being proposed within this building as is being proposed elsewhere within the site, this is not clear through the structural report.
- Details of the proposed treatment for the end of the Primary Beams needs to be provided
- We would encourage the use of a flitch plate rather than steel PFC in cases of sufficient deflection.
- We would encourage further information to be found on the previous repairs and whether it is necessary to replace or undertake further works if they have sufficient capacity. This will avoid the need for further intervention into historic fabric.
- The strengthening of the spine wall requires further details, which we want to see. Although we are not averse to the principle of using a new timber wall alongside the existing to provide additional stiffness.
- In terms of disproportionate collapse, we would want to have confirmation this approach has been agreed with Building Control. If any works are needed, then it is better to understand the level of impact at this stage rather than to retrofit later in the process.

We would also like to raise one further point about the removal of existing structural trusses, in particular to the rear of the Well House at ground floor (Section 5.1). It is not clear why this needs to be removed and we would have concerns about the potential impact this could have by trying to replace it.

Due to the sensitivity of this part of the site and a lack of detail drawings within the proposals, our preference would be for this information to be provided at an early stage to avoid issues once work has commenced on-site. However, if a more pragmatic solution is being sought the council may wish to consider apply robust and enforceable pre-commencement conditions. This should ensure that any structural works are supported by provision of detailed drawings, showing the location of the works and the proposed details for agreement in consultation with HE. These should cover the points raised above.

Redevelopment of the remains of the Royal Clarence and the Bank Building

a. New door

Further information is still required in terms of the external treatment, in particular the design of the new door. The former door opening, still requires evidencing and we would continue to encourage a simpler design treatment, such as a simple expressed frame and traditional door to help retain the sense of hierarchy between the existing openings within the façade.





b. Quality of materials

The quality of materials will also be key to the success of any scheme. These should be traditional and natural, with poor quality proprietary alternatives avoided. Samples of materials should be provided.

c. Opportunities

There are opportunities within the design treatment of the elevations that could assist in reinstating the lost character of the properties following the fire but also through unsympathetic 20th century changes. This should be based on historical evidence such as old photographs etc. Works could include -

- Reinstatement of the glazing bars where they have been lost, for examples in the Well House as well as the Exeter Bank.
- Reinstatement of the iron railing to the front of the Clarence to elevate its external setting.
- Reinstatement of the banding to the main building
- Realignment of the windows on the 2nd floor of the Bank Building and reinstatement of the missing moulding around the Diocletian window
- Careful consideration of the decorative treatment to enable the 4 facades to be treated differently.
- Following the fire, Flemish glass was removed from the Bank Building and stored. Steps should be taken to locate the glass and incorporate it into the scheme.

Historic England's Position

Historic England recognises that this is an important city centre site badly in need of regeneration. Identifying a sustainable development for the site, which responds to the various competing heritage sensitivities within the complex itself and within its setting has been a significant challenge.

It is recognised that the loss of No. 6 Martin's Lane will result in harm, but that the scheme does also bring forward some important heritage gains in respect of the presentation of the building and its relationship to the adjoining highly graded heritage assets. There are other opportunities where gains could be made through the external treatment of the buildings, its detailing and the reinstatement of certain features lost during the 20th century. The council should identify means by which to secure these gains and to address points previously raised regarding the presentation of the building.

There remain a number of outstanding points regarding the structural engineering proposals including the need for detailing drawings in order to better understand the extent of impact and the rationale for the proposals. If the council is minded to approve the scheme, then they will need to ensure that robust and enforceable pre-commencement conditions, requesting sufficient detail are provided to justify the





structural works and to ensure that any adverse harm is avoided and minimised (NPPF, Para 195). The final solution should be agreed in conjunction with Historic England and the council covering the points raised above.

In considering the application, the council will need to be convinced that the potential harm has been clear and convincingly justified and opportunities taken avoid and minimise any conflict (NPPF, Para 195 and 200). The scheme does offer potential heritage gains and there are others that have been identified above about the presentation of the facades. In considering the scheme any harm identified will need to be shown to be decisively outweighed by the benefits offered by the scheme including heritage gains (NPPF, Para 202).

Due to the complex historic environment and the multiple designations that could be impacted upon by the proposed development, the council will need to ensure the greatest weight is given to the conservation of the affected designated assets (NPPF, Para 199).

Recommendation

Historic England remains supportive of the principle of redevelopment of the Royal Clarence site, and we recognise the positive steps that have been taken regarding the scale and mass of the development as well as the incorporation of fabric and features in the Well House, Royal Clarence and Exeter Bank.

It should be acknowledged that considerable harm will be caused through the modest increase in height, some minor demolition as well as the loss of No. 6 Martin's Lane. The council will need to be satisfied by the proposed justification of the scheme in particular No. 6 Martin Lane. They should also seek additional improvement to the presentation of the building as set out above. In considering the proposals, the council need to ensure that any harm caused can be demonstrably shown to be decisively outweighed by the public benefits provided by the development including the heritage gains (NPPF, Para 202).

Due to the lack of information regarding the structural works proposed within the Well House, if the council is minded to approve the scheme, you will need to apply robust and enforceable pre-commencement conditions in respect of the proposed structural works in both the Wells House and the rest of the site. Historic England would welcome the opportunity to comment on this aspect of the scheme in further detail.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the applications to meet the requirements of paragraphs 195, 199, 200 and 202 of the NPPF.

In determining these applications you should bear in mind the statutory duty of



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sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Also to take into consideration section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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

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