From: Rachel Broomfield <rachel.broomfield@spab.org.uk>

Sent: 06 April 2022 14:03
To: Michael Higgins

Cc: Rhiannon Rhys (Rhiannon.Rhys@HistoricEngland.org.uk)

Subject: Re: Royal Clarence Hotel, Cathedral Yard, Exeter, EX1 1HD (application: 22/0237/LBC),

our ref: 174124

Importance: High

Re: Reconstruction and extension of building (including partial demolition and repair of remaining building fabric) following extensive fire damage to create commercial food and beverage units at ground floor and residential units from first to fifth floor.

Dear Michael

Thank you for consulting the SPAB regarding the application for the proposed works to the Grade II listed Royal Clarence Hotel, the adjacent Well House (No 17) and No 16 within Cathedral Yard, Exeter. We appreciate the extension of time which allowed us to take this application to our Casework Committee yesterday. We are now in a position to be able to provide you with the Committee's comments.

Following the devastating fire in October 2016 and a period of stabilisation and clearance works, the SPAB were consulted on the subsequent proposals to rebuild the site as a hotel in October / November 2017. We understand that consent was granted and that work started on site in 2018 but ceased in 2019 with much of the work having not been undertaken. In 2020 the site was sold to the current applicant and there have been ongoing pre-application discussions with the local authority, the owners and Historic England since which have led to this application being submitted. We have not been party to these pre-application discussions. It is also understood that recently consent has been granted for a new hotel on the High Street in relatively close proximity to this site, which has potentially had an impact on its viability as a hotel.

The Committee fully supports the principle of redeveloping this site given its sensitivity and position within Exeter. However, there were some concerns expressed regarding the proposals as submitted.

Proposed demolition of No 6 Martin's Lane (Zone 6)

In many areas little remains due to the fire, water damage and subsequent clearance / stabilisation works. We therefore feel very strongly that as much of the surviving historic fabric should be retained as possible, and that any further loss will require 'clear and convincing justification' (NPPF, 2021, 200).

With regard to the proposals to totally demolish the remains of No 6, the Committee were somewhat confused as the documents contradicted themselves. The Timber Survey Re-Assessment made it clear that given time to dry out, some of the timber work could be retained, repaired and reused. However, other reports referred to the condition of No 6 as being so bad that it has to be demolished. The demolition and removal of the surviving fabric here would clearly cause harm to our understanding of the site and at this time the Committee do not feel that adequate justification has been provided for us to support the proposed demolition.

Proposed structural works

Our Conservation Accredited Structural Engineer felt that the use of a steel frame to build off was probably a sensible solution given the fragility of what remains in many areas, but that it would need to be done with great care. It should also be born in mind that it is very difficult to get the steel frame close to the surviving historic walls so it is not clear how the new frame will relate to the historic fabric and how the two will be tied together. The survival of the timber frame in the Well House (No 17) and No 16 looks to be reasonably good but is it capable of load bearing? Are the proposals to install a steel frame here as well – we would much prefer to see the existing frame retained and repaired.

A significant amount of additional information is required to show how the frame will be positioned, fixed to the surviving fabric and also the foundations required to support it. Can the existing piles be reused, will more need to be inserted, and if so where and what are the archaeological implications of this? Another Guardian asked exactly how the new walls and floors would fit with the frame and surviving fabric.

Detailed repair specification

Where historic fabric has survived, there is very little detail on how this will be repaired. This will primarily relate to the Well House (No 17) and No 16 as we understand that the level of survival here is much better. The Committee felt that leaving this level of missing information to be conditioned was not appropriate and would be very difficult to manage. Detailed repair specifications are required prior to any decision being made.

Increase in roof height

The Committee were not unduly concerned by the increase in roof height, although it should be noted that it will be extremely visible from the Cathedral roof where public tours are now available. There were some concerns that the flat roof and balcony did not sit well with the gabled roofs of the Well House (No 17) and No 16, and that aluminum cladding with standing seams may not be the most appropriate treatment for the walls here – hanging slate could be considered as a potential alternative.

Change of use and density of the development

Some Guardians were concerned by the proposed change in use given that the buildings must have been insured and are listed. Has this been accepted now as part of the pre-applications discussions? We understand that reinstating the Royal Clarence as a hotel is no longer felt to be viable given that a new hotel on the High Street has just been granted consent. However, has consideration been given to a more mixed development – a smaller boutique hotel benefitting from the wonderful views to the Cathedral, with less but larger apartments on the upper floors?

There was also concern over the density of the proposed development on floors one to five and the resulting lack of natural daylight. The heavy subdivision of the spaces and the repositioning of floors means that the legibility of the listed buildings is considerably reduced and detail will be lost. There was a general feeling that the 'one-size fits all' approach to the various buildings should be replaced with a more individual and conservative approach in order to retain the historic fabric which survives on each floor and within each building. It was felt that the number of flats should be reduced so there are less but they are larger to improve the legibility of the spaces.

The Well House (No 17) and No 16

At present there is not enough information on these buildings, although the survival of historic fabric appears to be reasonably good. A survey of both timber frames should be undertaken to determine whether they are capable of load bearing and (if not) whether they can be repaired and strengthened without the need to insert a steel frame, which the Committee felt would be particularly disruptive. It will be important that every effort is made to retain as much of the surviving historic fabric as possible. Far more detail is required over how these buildings would be repaired and conserved and this should not be left to be conditioned. A detailed Repair Specification should be provided and this should be reflected in accompanying drawings. This should include a report from an appropriately accredited conservator regarding the works to the painted timber screen.

Summary

While the Committee were supportive of the principle of redeveloping this site and bringing the buildings back into use, they felt that at present more information was required for the application to meet the requirements of the NPPF, 2021, chapter 16. The Committee would like to see further information on:

- Justification for the proposed demolition of Zone 6 (No 6 Martins Lane)
- The proposed structural works in terms of the steel frame, linking this to the surviving fabric, the foundations, and the positioning of the new floor and walls
- A detailed repair specification for the surviving historic fabric
- A survey of the timber frame for the Well House (No 17) and No 16
- More information on the viability of the site as a hotel and whether consideration has been given to a more mixed use development.

The SPAB would be very happy to discuss this application again at Committee when further information is available.

We hope these comments are helpful to you.

Regards, Rachel

Rachel Broomfield
Caseworker (working days Monday to Thursday)
Tel: 01752 270409

Mob: 07840 974264

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The Society for the Protection of Ancient Buildings 37 Spital Square, London E1 6DY

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