



Historic England

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

Direct Dial: 0117 975 0725

Our ref: P01128814

28 August 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 29 July 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

The recent amendments to the proposed Harlequin Centre scheme have taken positive steps to address the previous concerns raised by Historic England in our correspondence on the 22 June 2020. Our only remaining issues relate to the impact of development on the below ground archaeological remains that form part of the Area of Archaeological Importance. We have also set out those areas where we consider that robust conditions and a section 106 agreement will be required in order to safeguard the conservation of affected heritage assets and in so doing address our 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.

The Harlequin Centre is an important city centre site and Historic England recognises that it presents a major opportunity for redevelopment. The site and its surroundings are key components of Exeter's historic environment, a valuable and finite resource. Whilst this adds to the challenge of creating a building that will positively respond to this important environment, we continue to consider that it should be possible to design a scheme that would address the heritage sensitivities in line with relevant



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legislation and policy.

Historic England's Involvement

Following our comprehensive responses on the 19 December 2019 and 22 June 2020, Historic England has had further discussions with the applicant and the council to address our on-going concerns. We welcome the most recent amendments which have sought to address our previous comments to deliver a more successful version of the proposed development in response to the historic environment on and around the site. We do not intend to reiterate every previous points raised in our earlier responses. Therefore, this letter should be read in conjunction with those correspondence sent in 19 December 2019 and 22 June 2020.

Significance

The redevelopment of the Harlequin site would affect a range of heritage assets in Exeter. Our initial advice (19 December 2020) contains a detailed explanation of their significance. We will not reiterate that assessment here but rather highlight throughout our letter those elements of significance that will be particularly relevant to the council's consideration of the application, the changes made, and to explain our advice. The heritage assets our advice focuses on are the two conservation areas - Central and St David's, the scheduled city wall and Grade I listed Exeter Cathedral. Historic England's statutory remit does not include the impact of the proposals on individual grade II listed buildings. The council's own heritage specialist will assess these impacts and we refer you to their advice.

The revisions

The latest revisions have assisted in the development better responding to the underlying topography and the architectural character of the conservation area. These revisions include-

- Removal of western section of the top floor to block 1
- Removal of an entire floor of the tower element of block 2, down to 6 storeys
- Further amendments to the elevational treatment of both blocks
- Creation of an active frontage to Block 1 and 2

Additional information has also been provided. This includes the investigative work related to the scheduled city wall, archaeological assessment of the geotechnical work as well as updated visualisations and photomontages of the proposed development. The new documentation includes-

Ogden Conservation Exeter City Wall- Section between Northernhay Street and Paul Street: Condition Survey and Conservation Appraisal (July 2020)



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Mann Williams *Exeter City Wall, lying between Northernhay and Paul Street: Overview report of Structural Condition, relating to the harlequin Centre Redevelopment* (July 2020)

Tobit Curteis Associates LLP *Exeter City Wall, lying between Northernhay and Paul Street: Preliminary Assessment of the Environmental and Conservation Impact of the Development of the Harlequin Centre* (July 2020)

Cotswold Archaeology *Harlequin Centre, Paul Street, Exeter: Archaeological Addendum Report* (Aug 2020)

Impact on the designated heritage asset

The reduction in the scale and massing of the proposed building addresses our concerns regarding the impact of the scheme within the wider cityscape and on the skyline in relation to the cathedral towers. The amended elevational treatments respond better to the architecture of the surrounding conservation area. We are therefore now content to advise the council to carefully consider how to secure the high standard in terms of materials and the execution of the construction that development on this site requires.

Massing scale and modulations

The reduction in height of block 2 has allowed the development to more closely reflect the underlying topography by gradually decreasing the height of the blocks forming the building's profile. This will allow the development to sit more in line with the city's existing skyline and avoids potential conflict with the cathedral tower in longer range views (VP3, 5 & 6).

The reduction in block 1 has helped to reduce the bulk and mass of the upper floor in views from Queen Street. It has also made some modest steps to improve the transition between the scale of the new building and those existing structures within the Exeter St David conservation area. It helps the appreciation of the building in longer range views appear to better respond to the underlying topography and reduces the bulk of the tower element of Block 1.

Active frontages

It is proposed that interest will be created along the southern corner of Block 1 and the south east elevation of Block 2 through the use of perforated screens showing historic images. It is acknowledged that the internal layout and the need for accessible service areas makes it difficult to accommodate an active frontage in these locations through the inclusion of windows and openings. The proposed screens will create a less austere appearance to these sections of the elevations and we therefore welcome this amendment to the detail of the scheme.





Block 1 elevational treatments

The elevational treatments have been simplified with the creation of slots of windows to reduce the number of openings. Banding has also been applied which helps to provide greater rhythm to the colonnade section of Block 1. The addition of the horizontal banding has also broken the vertical emphasis of the elevations on the tower element creating a more defined sense of hierarchy to the facades. The proposed green roof introduces a less traditional feature into the conservation area and the council will need to be confident that it will be sustainable in this urban environment. In respect of the proposed green wall to Block 2, we would encourage the council to ensure that provision is made for the on-going maintenance and management of the green wall with an agreed contingency should it fail.

The success of the proposed design will depend upon the quality of the materials used as well as a high standard of execution. Due to the amended information provided, we are now content for the council to secure this aspect of the scheme through appropriately worded conditions.

Physical Impact on the scheduled wall

Historic England has been pleased to review the three reports from Ogden Conservation, Mann Williams and Tobit Curteis Associates. We welcome the commitment from the applicant to addressing our concerns in relation to the scheduled wall and the quality of the initial assessments commissioned. In our view, this forms a significant benefit offered by the redevelopment of the site. The reports jointly provide a comprehensive basis for informing future discussions regarding the conservation of the wall, the extent of suitable protection during construction as well as on-going maintenance and management of the scheduled monument once the site is in operation. The council will need to be confident that sufficient resources are allocated to the wall's conservation based on an accurate estimate of the work. Thereafter, these conservation works will need to be tied into the programme of works on the site should the application be approved.

The reports confirm that the scheduled wall is in a poor condition resulting from structural instability, deterioration of the stone and the loss of mortar and the ingress of water. The redevelopment of this site presents an opportunity for a comprehensive scheme to stabilise and secure its future presentation as an integral element of the proposals.

We would strongly encourage the council to ensure that all the recommendations are secured through the planning process as part of a S106. Due to the sensitivity of the wall some steps should be undertaken prior to work commencing on site. This will assist in minimising the risk that construction works on site could result in any areas of additional deterioration or, at worst, collapse.





We understand that there has been discussion regarding the provision of a lump sum from the applicant to the council for the necessary repairs to the wall. We would encourage that any lump sum is based on a detailed understanding of the extent of works and that this is used to inform the value and costs related to the scheme. This will allow the council to be assured that the estimate is accurate for the extent of work required. We note from the documents that they recommend that further structural assessment is undertaken. It would seem appropriate to ensure that this detailed assessment is undertaken initially to inform any detailed costed specification on which basis a final sum can be agreed.

Regardless of this the necessary conservation works will need to be tied carefully into the programme of construction on site as some of these works may be required before work commences on site to ensure that appropriate safeguards are in place given its structural instability.

We recommend that as part of any approved scheme a construction management plan should be a pre-commencement requirement. Since these works will require scheduled monument consent, Historic England will be pleased to offer further advice in consultation with the applicant's specialists. Subject to the above issues being secured through the planning process, we are also pleased to confirm that this would address our concerns related to the physical impact on the scheduled wall.

Below ground archaeological remains

One final element of the scheme on which we have previously indicated our concern is the impact on and treatment of archaeological remains within the designated Area of Archaeological Importance. Unfortunately the submitted reports have not addressed our concerns in this regard and we would welcome the opportunity to discuss this element further in order to find a resolution.

We again welcome the applicant's wish to engage with the belowground archaeological impacts on the site through the commissioning of the Cotswold Archaeology archaeological addendum report.

The report comprises an archaeological assessment of the results of geotechnical investigation (GI) on the site. It would be extremely helpful if the applicant were able to provide copies of the GI reports for comparison with the archaeological addendum. The addendum has not been produced by a geoarchaeologist and consequently some elements of the conclusions have been difficult for us to interpret. Furthermore, we are unclear when the GI works were conducted but the report indicates that some elements of these transected previously excavated areas of archaeological work from the 1980s investigation of the site (Trench 1). We note reference to geotextile being identified within the two trenches and would like to understand better if this is an





indication that any of the GI work was conducted in areas where geotextile may have been laid in areas where archaeological remains were retained in situ following the 1980s excavations. Without access to the GI reports we have been unable to form a final conclusion on this basis. Ideally we would expect a geo-archaeologist to be present during the full extent of the investigation and for all archaeological work in areas where remains had previously been recorded to be undertaken with appropriate archaeological supervision. It would be helpful to understand better the sequence of events so that we can advise further in relation to the Area of Archaeological Importance and those archaeological remains within the setting of the scheduled city wall.

Setting of the scheduled wall

We are pleased to note that the amendments have achieved improvements within the setting of the scheduled wall and could be further enhanced through the landscaping scheme for the site.

The proposed landscaping along the wall is also a benefit in heritage terms. In the Tobit Curteis Associates report this was however identified as an area of possible concern due to liquid water exposure from surface run off. We would encourage the applicants to review their landscaping plan with their specialist advisor to identify if there are opportunities within the design through which this identified risk can be minimised. This will ensure that the wall's physical conservation is not undermined by the otherwise positive aspect of the scheme.

Historic England's Position

Historic England appreciates that the site presents a major opportunity for redevelopment within Exeter's historic City Centre. In our letter dated 22 June 2020, we set out the steps that needed to be undertaken to enable Historic England to remove the concerns we previously identified.

We welcome the applicant's positive commitment to address our concerns. The reduction in the scale of the development and the amendments to the elevational treatments will assist in the building responding better to its historic surroundings (Para 192(c), NPPF).

The reports setting out the condition of the scheduled wall form an excellent basis on which to secure its future conservation. We continue to consider this one of the significant heritage gains from the scheme. Since works to the wall would require scheduled monument consent we would welcome the opportunity for further discussion regarding the scope, cost and necessary timing of such works to inform discussion regarding a section 106 agreement and the approach to the Construction Management Plan (Para 190, NPPF).





The one outstanding area on which we would welcome further discussion is the impact on the below ground archaeological remains. We again appreciate the applicant's commitment to this aspect of the scheme through the additional report produced and GI works that were undertaken. We would welcome the opportunity for further discussion to resolve the remaining issues and clarification identified in our letter (Para 189, NPPF). We would welcome continued involvement in this aspect of the scheme given the Area of Archaeological Importance the contribution of remains to the significance of the nationally important scheduled city wall in conjunction with the council's own archaeological advisor. Historic England's Science Advisor is well placed to engage with the development of sampling strategy for the site and approach to archaeological mitigation (Para 190, NPPF). We would appreciate sight of the borehole logs and report on the GI trial trenches initially.

Notwithstanding the above, we are pleased to confirm that the proposed amendments have assisted in providing a better balance between the development and the historic environment in planning terms. We consider that in the main the amendments have addressed the steps set out in our previous letter (dated 22 June 2020). We look forward to further targeted discussion to resolve the remaining issues highlighted above.

Recommendation

Historic England can confirm that the majority of the concerns we outlined in our previous advice on heritage grounds have been satisfactorily addressed by the latest amendments. Our outstanding concerns are related to the impact of the scheme on the below ground archaeological remains and are explained in detail above. We hope that these can also be resolved through collaborative discussion.

We have also identified above those elements of the scheme where with application of appropriate safeguards by condition by the council, we are content to indicate that our concerns have been addressed.

The council should seek to resolve these issues through a series of robust conditions and S106 agreement on the basis of our advice above.

In determining this application you should bear in mind the statutory duty of section 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. You should also bear in mind the statutory duty to consider section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, ensuring that special attention is paid to the desirability of preserving or enhancing the character or appearance of conservation areas.



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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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cc:

Andy Pye, Exeter City Council



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