

DRAFT NOTES on planning application 19/1556/FUL The Harlequin Shopping Centre, Paul Street, Exeter, EX4 3TT

Introduction

These notes have been commissioned by 'Save our Historic Exeter', a group of residents of Northernhay Street, Exeter formed to oppose a proposed development on the site of the Harlequin's shopping centre in Paul Street. The notes have been compiled from a heritage-based perspective to provide responses and suggestions to the heritage-assessment aspect of the application submitted so far. They are thus based on a thorough reading of the documents submitted as part of the 'Historic Environment Desk Based Assessment' (HEDBA) comprising the assessment itself (Gardner and Robinson Wild 2019, in two volumes), with the separately-authored appendixes assessing the archive of previous work (Meaton and Stubbings 2019), the archaeological evaluation (test trenching) carried out by Cotswold Archaeology in February 2019 (Sworn 2019), and the addendum on No. 42 Northernhay Street (Robinson Wild and Waite 2019). In addition I have read and incorporated information from relevant parts of the Planning Statement (JLL 2019) and the Design and Access Statement (anon. 2019), but the time available has not permitted a thorough scrutiny of these and other supporting documents in this extremely lengthy and complex application (amounting to some 177 separate files of documents and drawings). By and large I have avoided comment on the impact on listed buildings in the vicinity and other built-heritage matters (other than the city wall) as these have been covered in some detail by other responses (e.g. The Georgian Group; Historic England).

Organisation/plan of response

My notes are organised in two main sections; the first is concerned with specifically archaeological/cultural heritage-related matters; the second has some more general comments on the impact of the proposed development, particularly on the misleading nature of the photo-montages, but also including brief comments on other aspects of the proposals. The final concluding section offers a brief summary of these notes and attempts to draw out some suggestions.

Archaeology and Cultural Heritage

A number of relevant sources not cited

The authors do not seem to be aware that there is a specifically archaeological analysis of the stratification and development of the town defences at Paul Street in the shape of my report of 1988, which is freely available via the Archaeology Data Service (ADS) (Blaylock 1988). Another notable omission is the specific consideration of the crucial dating evidence recovered from the Paul Street excavations by Neil Holbrook and Paul Bidwell in their *Roman Finds from Exeter* (1991, 9–11). Other basic sources for the Roman and medieval defences of Exeter, which might have helped to set the scene, are not cited (e.g. Fox 1952; Burrow 1977; Bidwell 1980; Henderson 1984; Stoye 2003).

In the review of 'Previous Heritage and Archaeological Investigations' (pp. 31–35) the bulk of the interventions discussed antedate the construction of Harlequin's. But one more recent intervention has yielded relevant observations: a watching brief on the revetment, landscaping and soft capping of the wall to the rear of Harlequin's conducted by Mike Baldwin in 2009 (carried out by Marie Leverett under my supervision: Leverett 2009). This should have shown up in a search of the Historic Environment Record, but clearly did not. This exercise consisted of 5–600mm deep foundation trenches for new brick retaining walls immediately behind the wall fabric. Clay rampart layers were observed over much of the length investigated, but the trenches did not penetrate primary rampart layers (Leverett 2009, 6); which are generally distinguished by their clean, freshly-dug composition and absence of volcanic stone fragments (which only appear once construction of the stone wall has commenced). This suggests that the preservation along the rear of the wall in this area will be significant and could see at least 1.5m, possibly more, of standing rampart material.

Neither Gardner *et al.* (2019, 31–35; fig. 23) nor Cotswold Archaeology (e.g. Meaton and Stubbings 2019, 2–4) appear to be aware of this work (the account of previous work given in the assessment appears to end in 1988: Gardner and Robinson Wild 2019, 35), which adds significantly to the corpus of knowledge of the wall and rampart, and represents an important series of observations of the post-Harlequin's configuration of the site. Comparison of the ground levels either side of the wall would also have helped with visualising the likely build-up of deposits inside the wall.

The archive: has it all been examined?

Neither Triskelion nor Cotswold Archaeology seem to have had access to all the material relating to previous archaeological work on the site, and the assessment seems to me to be particularly weak in this area. It is not clear whether this is because the archive material deposited in Exeter Museum is incomplete (CA mentions seeing seven boxes of the archive on the 1982–85 excavations at Paul Street and one on the 1978 North Gate excavation from the RAMM: Meaton and Stubbings 2019, para. 1.10), or whether the material has failed to survive in a form that can be readily consulted (much primary material from Exeter Archaeology is known to have been scanned in c.2015, and the originals subsequently discarded).

In their assessment of the archive Cotswold Archaeology are less than complimentary about the standards of recording by Exeter Museums Archaeological Field Unit (EMAFU) in 1982–85. While this may well reflect a discrepancy between the standards of today and those of forty years ago, it also seems possible that they may not have had access to the archive report file which contains typescript archive- and stratigraphic-reports, original copies of drawings and synthetic information. For example, much stress is laid on the absence of easily accessible level information, and the failure routinely to reduce levels to absolute heights (Meaton and Stubbings 2019, 1.14); this information would have been recoverable from the temporary bench mark data I know to be in this file (because I compiled them!). The description given in the archive review suggests that synthetic material of this nature was not examined in 2019: 'All the available material contained within the archive boxes was reviewed, including sections, plans, context sheets and recording registers. Relevant height

data and context information was derived, with additional data drawn from unpublished and published excavation reports/summaries [...]' (Meaton and Stubbings 2019, para. 1.11).

Nowhere is there an illustration based on one (or more) of the EMAFU 1982–85 section drawings through the defences which clearly show the sequence of ramparts and stone wall, plus the metallised street surface to the rear. Again, these were all drawn up and the primary (bromide print) copies were contained in the Paul Street archive file just mentioned. In addition most of the key section drawings were included in the synthesis of work on the Roman defences mentioned above (Blaylock 1988, figs 6–10; 12–14). I suppose it is not impossible that this file will have been discarded as has happened which much of the EMAFU/EA *nachlass* that was deemed to be 'secondary'. Another informative drawing that could well have illustrated the assessment is a reconstruction drawing of the wall and rampart, based on the excavated evidence from Paul Street and published in a number of places (Blaylock 1998, 2; Henderson 1984, fig. 20; xxxxxx [EMAFU Annual Report 1983, fig. xx, **ref. to obtain**]).

Map regression

The map regression (Gardner and Robinson Wild 2019, vol. 1, figs 7–17; see also pp. 3 and 14–15), omits two of the most important Exeter maps: (i) Rocque 1744, the first attempt at a newly surveyed map of the city, which was much more accurate than the preceding efforts of Fairlove, Stukeley and the like, and which forms an important staging point in all topographical considerations of the city's development; and (ii) the 1:500 Ordnance Survey town plan of 1876 onwards (the relevant area falls on two sheets Devon LXXX.6.12 (north) and LXXX.6.17 (south) resurveyed in 1888 and published in 1891), the largest scale survey ever made, and therefore (a) the most accurate and (b) an enormously informative source for the late 19th century appearance of the town, showing the plans of individual buildings and naming the various courts and closes running back from Paul Street. These maps ought to be illustrated as far more detailed and informative than the second edition 1:2500 scale maps that actually are (as figs 15 and 16).

In general the review of the map evidence (p. 14; figs 7–17) is selective and omits some of the more informative map sources while dwelling on less-informative ones (e.g. Braun and Hogenberg's map of 1618 shows little different to Hooker's earlier (1587) map because the one is cribbed from the other, and is unlikely to contain additional topographical information of any accuracy or significance. Conversely other significant maps are missing, such as the Coles/Fairlove map, of 1709, which was the first attempt to improve upon the much imitated and debased cartographic format ultimately deriving from Hooker (the prevalent form of 17th century mapping), and which was cribbed by William Stukeley, whose map *is* illustrated (fig. 9), in 1723.

There are other notable maps that could also have been included (compare Gray 2006; Bennett and Batten 2011 for printed maps), even before manuscript maps and plans are brought into consideration. The Exeter Chamber Map Book of 1758 is cited and one map is illustrated (HEDBA vol. 1, fig. 10), but this is the map that covers the area outside the wall in Northernhay: there is an equivalent showing chamber (i.e. city) property inside the wall, which would be much more relevant to this study and which shows very clearly the strip of

land inside the wall representing the rampart/rampart walk. This remained in the ownership of the city long after it ceased to be used in the city's defence; and the map clearly shows this feature running from the castle to the North Gate, albeit split up into numerous separate properties by the mid.-18th century.

Playing down of potential survival

Despite the statement that buried archaeological deposits on the site are all considered to be of national importance (HEDBA, vol. 2, p. 12), and other similar statements elsewhere, one notices a recurring tendency in the assessment to play down the possible extent of survival (*ibid.* vol. 1, pp. 31; 45; 46; etc.). I would contend that the potential for survival is not so bleak, that what we know of the surviving archaeology of the site shows that there is evidence that significant depths of rampart (and possibly other deposits) will survive (e.g. Leverett 2009; the 2019 evaluation trench 1); and that although we know little of the extent of destruction caused by the construction in the 1980s (for reasons that are noted elsewhere), the presumption should be that some archaeological deposits will survive on the site. Survival will depend on the inter-relationship of the underlying natural topography/gradients and the modern interventions, particularly the lower storeys of Harlequin's, which undoubtedly will have terraced into the slope (and this is possibly why the 2019 trench 2 encountered no rampart deposits). But outside of the building footprint and possibly also within it in pockets, there is some chance that archaeological deposits will survive, and will be encountered during any new construction work on the site.

Scheduled Ancient Monument status and Area of Archaeological Importance

'[...] the site of a monument includes not only the land in or on which it is situated but also any land comprising or adjoining it which appears to the Secretary of State or a local authority, [...] to be essential for the monument's support and preservation.' (Ancient Monuments and Archaeological Areas Act 1979, s. 61(9)).

'Extent of a scheduled monument: Most scheduled monument entries contain a map. Protection is offered to everything that forms part of the land and buildings within the map boundary unless expressly excluded, as some features are, such as modern-day road surfaces.

'The protection extends not just to known structures or remains but also to the soil under or around them. This is in order to protect any archaeological interest in the site, but the extent of the protection is not dependant on there being such an interest.'

(<https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/>, accessed 16.i.20).

The Exeter City Wall is unusual inasmuch as it is a linear monument and cannot easily be delineated with precision on a map, usually at quite a small scale (scheduled monument 'maplets' are usually at a scale of 1:2500 or 1:10,000).

Conventionally it has been said that Scheduled Monument Consent (SMC) would be required for works in the immediate vicinity of a Scheduled Ancient Monument (say within 2–3m). I have enquired of Historic England regarding an up to date view on this matter [**enquiry pending 27.i.20**]. Nevertheless it could be safely assumed that SMC would be required for works in close proximity to the wall and certainly within the 500mm cited in the

application as the limit within which new interventions will not intrude (*Planning Statement* para. 6.50, which states that because of this margin SMC will not be required).

In my 1995 report I wrote the following on the scheduled status of the city wall (composed in close consultation with, and the agreement of, English Heritage, as it then was): '*Statutory Protection*: The city wall is scheduled as an ancient monument of national importance (Devon No. 136), and as such enjoys the protection afforded by the Ancient Monuments and Archaeological Areas Act of 1979 (below, p. 105). The monument was scheduled a long time ago and the status of certain areas of the wall itself is uncertain. Most, if not all, of the standing fabric of the wall, i.e. the masonry structure, is scheduled; but very little of the associated areas, such as the bank behind the wall, still less the areas occupied by ditches and earthwork defences outside the wall, enjoys statutory protection. At the time of writing a revision of the scheduling is under consideration and it is hoped that this matter will be clarified, and statutory protection extended to the full area of the defences, in due course.' (Blaylock 1995, 5).

See also my recommendations about improving the level of statutory protection (Blaylock 1995, 123). Although this was under active consideration in the mid.-1990s, nothing ever seems to have come of it.

The significance of archaeological deposits is judged to be 'high' by the documentation submitted (HEDBA vol. 2, p. 12, *inter alia*), although in places rated as unlikely to survive. The provisions of the Area of Archaeological Importance should be invoked to provide for monitoring of all demolition and ground disturbance on the assumption that some archaeological deposits will be encountered. So little is known about the impact of the 1980s development, and so much of the site remains unexplored by excavation, that the assumption must be that some deposits survive on the site, until proven otherwise.

A monument 'at risk'

In November 2018 Exeter city wall was listed among the 'Monuments at Risk' by Historic England (<https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/43917>, accessed 17.i.20), reflecting an increasing neglect of the inspection and maintenance of the wall. The justice of this move was amply demonstrated within just a couple of months when a section of the wall backing onto the yard of the City Gate public house (formerly the Crown and Sceptre) at North Gate collapsed suddenly in January 2019. This had been one of the best sections of Roman facework masonry to survive on the north-west side of the city and had been under observation as a repair priority for some years up until 2010, after which regular maintenance inspections seem to have ceased. The immediate problems that led to the collapse may have originated in a period of exceptionally wet weather, but they may have been exacerbated by factors arising from the structural history of the monument, as the main fabric of the wall in this section had been underpinned by successive reductions in ground level outside the wall (mainly connected with the pub yard and other terracing activities).

Other comments on aspects of the assessment

[page numbers refer first to those of the pdf file/second as paginated]

p. 8/5 Geology: we know that Permian lavas form bedrock in the middle of Queen Street/the Rougemont Hotel area, although not how far they extend beyond that. The natural subsoil observed during the 1982–85 excavations was nearly all purple Culm clays on shale. This is accurately described in the evaluation report (Sworn 2019, para. 1.5).

p. 12/9 A stage is omitted in the development of the defences, in which we move straight from a settlement within the fortress defences to cutting away of the front of the bank to build the stone wall (para. 1). This may have arisen from misunderstanding of the sequence; or may be just an oversight, but the early bank on the line of the subsequent stone wall/higher rampart ought to be represented here.

p. 17/14 The front of the Pennington's tenement on the street frontage did not 'remain unexcavated' it had been removed by later cellars.

p. 21/18 Figure 9: the 1723 map of Exeter is by *William* Stukeley (not John!). The error is compounded in Sworn 2019, para. 2.20, where Stukeley becomes 'John Stukeley'. To be fair this error (which ought to have been obvious to most archaeologists: Stukeley is one of the great antiquarians) may be the result of repeating an error in Todd Gray's book of Exeter maps (Gray 2006, 6), where it is also found (although the reproduction of the map [*ibid.*, 15] clearly shows his name as 'W. Stukeley, *del.*').

p. 34/31 The description of the data inadequacies relating to the 'top of archaeology' and Roman and post-Roman details suggest that they did not have access to drawn sections through the rampart and other features of the defences (which certainly exist). As a result the description of the archaeology given here is inadequate in a number of ways.

p. 34/31 para. 4 concludes 'survival of Roman and post-Roman stratigraphy is unlikely to be extensive.'

p. 35/32 para.3, it is not true to say that the bank had been entirely covered over before excavation: the one section of visible bank on this side of the city (there are more around the castle, and in the Cathedral Close area) was on the site of the Pennington's tenement, where it survived as a (rather overgrown) earthwork above ground.

pp. 38–39/35–36 The general description of the wall on these pages is confused and repetitive, and would benefit from editing and re-organisation.

p. 48/45 'Assessment of significance': 'potential for important archaeological strata to survive in good condition on the site is considered not to be high.' *but* the potential is there and it does exist, at least in pockets, as has been shown.

p. 49/46 Para. 1 (below table) acknowledges the 'national and regional significance' of the 'the known and suspected archaeological non-designated heritage assets within the site'. Para 2, on dating evidence, should have had a reference to the discussion of the dating evidence by Holbrook and Bidwell (1991, 9–11), a publication of which they are unaware.

p. 50/47 'Setting'. I would argue that 'setting' for the wall as a monument includes the linear plots that represent the rampart (often referred to as 'the barbicans' in the medieval and early modern period). These survived as physical entities until relatively recently (they are all visible on the mid C18th Chamber Map Book [though sadly not on the maps chosen to illustrate this assessment], for example. Some sense of this can also be gleaned from the standing ramparts on the south-east side of the city: 14 and 15 The Close, Bishop's Palace, Convent). Although sometimes encroached upon by buildings this phenomenon is still clear on in the Paul Street area on the 1:500 OS map, consisting of gardens and separate structures immediately behind the wall.

- p. 51/48 Suggests that the Harlequin centre detracts from, and the proposed development will enhance, the setting of the wall (and with the provision of the proposed interpretation centre). Also here other archaeological assets are considered to be of national importance (the fortress rampart, ditches, road) so why not the rampart of the city wall (see also the general statement above, p. 49)?
- p. 53/50 Harlequin's is said to be 'intrusive' from Northernhay Street: but nowhere near as intrusive as the proposed development will be.
- p. 62/59 Figs 47, 48, etc. the captions could mention that we are looking at the city wall in these images.
- p. 68/65 Figs 59–61, ditto: we are looking at the above-ground remains of the wall, but no mention is made of them (this is mentioned briefly in the caption to fig. 62, but more could be made of this to help to indicate the current setting of the monument).
- p. 72/69 Viewpoint analysis: This is pretty faulty, notwithstanding the fact that 'The key views were discussed with and incorporate the suggestions of the Exeter City Archaeology and Conservation Officer' (see also below).

General comments on the impact of the proposed development

The 'illustrative photomontages'

These 47 photomontages (LHC 2019: 'Harlequins–Landscape and Visual Impact Assessment: Illustrative Photographic Views') are often misleading, if not downright disingenuous, consisting either of very distant views in which the outline of the development is barely distinguishable (e.g. views 1–6), or of close-ups, such as the view from St David's Church/Hele Road (view 12), which claims that the development is not visible from this view point. In fact this is because the view is entirely filled with the church in the foreground; no doubt the development would be visible had a view point been chosen slightly further to the east or west! Similarly, there is absolutely no possibility of the development being seen from the selected viewpoint in St David's Hill (view 11), as the foreground is dominated by rising ground and tall buildings! Another example would be the view from Mount Dinham (view 16) which is positioned so far down the slope to the west of St Michael's church as to eliminate any view of the development; when it is taken from beside the church, a little further to the south-east it is a different matter (compare view 15). The only straightforward 'as proposed' views among these are those showing the development from Bartholomew Street (views 22 and 23) and Queen Street (views 26; 28–29); the other views from Queen Street employ low view points immediately in front of large buildings (the Rougemont Hotel and Exeter College in the case of view 25; the Dispensary and Elim Chapel in the case of view 27). In fact one suspects that in view 27 the mass of the proposed building has simply been omitted or forgotten (compare view 36, taken from further north-west along Queen Street, which does show the proposed building above the Dispensary building; moving south-east to the view point for view 27 must show more of this, not less; equally compare view 42, from which the proposed building will be 'not visible'; if this is so it can only be because of an extremely low view point). One of the views from Northernhay Gardens gives some idea of the massing (view 33), but elsewhere the artful placing of trees is used to minimise glimpses of the building (views 34; 41). As for Northernhay Street/Northernhay Square

(views 38; 42–45; 47) no amount of foreshortening can disguise the massive impact of the proposed buildings, towering over the houses and the city wall.

The chosen view points look reasonable enough when presented on the inset maps included on each figure, but once relief is taken into account the disingenuousness really becomes apparent. It would seem that the choice of viewpoints has been carefully selected to minimise the view of these enormous structures; and in viewing the series one continually asks oneself the question 'what if this were moved a few metres to the left or right, or a little further back?', and the answer usually emerges that one would see significantly more of it. One wonders whether a model would not have been a much better (and more 'honest') way of demonstrating the impact of this proposal on the surrounding streetscapes.

Ground contamination

We had some experience of ground contamination (*Planning Statement*, para. 6.56) in 1982, trench 6, into which there was a constant seepage of diesel oil from former bus-station fuel tanks. I have no information on whether (or to what extent) this problem may have been addressed during the construction of Harlequin's, although I do know that the ground levels were reduced along the rear face of the wall to permit the access road to be made to the necessary gradient, so some of this is likely to have been encountered. Trench 6 lay mostly outside the footprint of the building, running back from the city wall along-side and to the north-east of Maddock's Row (Gardner and Robinson Wild 2019, fig. 23; Meaton and Stubbings 2019, fig. 2).

Notes on the Design and Access Statement (anon. 2019) and the Planning Statement (JLL 2019)

In the discussion of ecology and the like in volume 4 of the D&AS no allowance is made for the survival of Roman rampart behind the wall (compare above, *passim*).

The garden at 'C', NW of Block 1, occupies the area of the bell foundry but does not appear to be mentioned in the text; this area is potentially sensitive, but also potentially damaged or destroyed (or at least reduced in level) by the 1980s construction works.

The images of the 'urban oasis garden' (p. 16) appear entirely unrelated to this proposal, e.g. those in the centre showing ecclesiastical ruins – of what relevance are these supposed to be?

The discussion of stone is wildly inaccurate (p. 25), for example: 'Heavitree stone' for the Pocombe stone used in the RAMM; 'local red stone' for the Permian lava (usually seen as grey or purple) which is the predominant material in the city wall.

Parking: 42 spaces are proposed (as opposed to 90 at present [*Planning Statement*, para. 2.6]), of which ten will be privately leased according to existing arrangements. This is nothing for a development of this size,* and in practice will presumably be wholly taken up with hotel visitors (assuming the hotel element of the proposal comes to pass). As much is implicit, in fact, in the Planning Statement (para. 3.8). The residents of this scheme will have cars, like it or not, and reducing the on site parking will push this problem out elsewhere.

There is no question of it being 'car-free' as is stated elsewhere (*Planning Statement*, para. 6.92, for example).

*The proposal at present comprises 298 'co-living' bed spaces plus 114 hotel bedrooms. This has been reduced from 320 and 170 respectively in December 2018 when the developer approached ECC regarding an EIA (which was thought not to be necessary: *Planning Statement*, para. 1.14). Regarding size it should also be noted that the development was envisaged as two towers of 20 storeys each at 'concept stage', subsequently reduced to between 13–18 storeys and then still further to 11–12 storeys (*Planning Statement*, para. 3.6). By the time of the public consultation in June 2019 this had been reduced still further to one block of ten storeys containing 315 student beds and the second block of nine storeys containing a 140 bed hotel and 23 student studios (*ibid.*, para 3.8).

Heritage: 'The scheme does not impact on [the city wall] directly, but does seek to enhance its setting through high-quality design' (*Planning Statement*, para. 5.30). It certainly does impact directly on the wall, because of (a) its close proximity; (b) because of the remains of the buried rampart, which, as I have attempted to demonstrate and emphasise in all I have written about the wall (e.g. Blaylock 1995, 1; *idem* 1998, 1), is an integral element in the defensive ensemble, and is actually structurally indivisible from the wall fabric in places, in the sense that the two were constructed together and often merge together without a clear and distinct boundary or division, especially in the primary layers of the second (higher) rampart, which was built up layer by layer in tandem with the stone wall.

The proposed development is said to be contained wholly within the footprint of the present building (*Planning Statement*, para. 6.49), (Gardner and Robinson Wild 2019, vol. 2, fig. 9 appears to be the only plan to show this relationship). Furthermore the Harlequin's construction is said to have been likely to have destroyed what was left of the archaeology, and the probability of archaeological deposits surviving beneath the existing footprint is said to be 'very low' (*ibid.*, para. 6.48). I think this is far from certain; although one can see the lower part of the site having been terraced-in quite deeply for the service areas and the basement car park, for example, more may survive further up the site to the north-east and to the rear of the present building. I have no direct knowledge of this as we were excluded from the site during the development (I remember doing my best to keep track of what was going on by taking photographs from the top storey of the Guildhall car park [which should survive in the EA archives], but that was as much as was possible).

Unbelievably, new works are said to be going to be kept *500mm* [my italics, namely just 50cm or half a metre] from the line of the city wall (whatever that means) and 'will minimise likelihood of significant direct impacts on the scheduled monument and means that Scheduled Monument Consent is not required' (*Planning Statement*, para. 6.50). Quite apart from the problem of where one draws the line of the limit of the city wall masonry (is it the visible fabric above ground? does it allow for stepping out below ground? and so on and so forth) the zone of transition from masonry fabric to clay bank was often at least 500mm. This will certainly need SMC (see also above).

Conclusions

As these notes have become lengthy, it may help, by way of conclusion, briefly to summarise the main points to have emerged from my reading of the application.

Several quite fundamental archaeological sources have been overlooked. Inclusion of these would permit a more rounded and informative assessment of the site.

The assessment of previous archaeological work is thin in places, perhaps because the whole archive has not been accessible.

Illustrations that could have informed and explained the assessment (such as sections through the wall and rampart, and a reconstruction drawing of the Roman defences) have not been included.

The sequence of historic maps omits some key maps and places emphasis on others of lesser relevance.

The potential survival of archaeological deposits is played down. As a result the need for further archaeological work on the site is underestimated.

It follows that more archaeological information is needed, both from the archive of previous work and in attempting to predict what survives and is likely to be encountered in any redevelopment of the site.

Scheduled Monument Consent will certainly be needed for works impinging so closely on the fabric of the wall.

Locally, survival will depend on the interaction of natural underlying topography/gradients and modern interventions. There is evidence that significant depths of rampart material (and possibly other archaeological deposits) survive on the site.

The visual material presented in explanation of the impact of the proposed scheme is not straightforward and is often open to challenge, particularly the 'illustrative photomontages'.

The buried archaeological deposits on the site are judged of national significance, and this is supported by the provisions of the Area of Archaeological Importance, and the adjoining Scheduled Ancient Monument. The assumption should be that more survives rather than less until demonstrated otherwise.

Bibliography and references

Ancient Monument and Archaeological Areas Act, 1979.

anon. 2019 *The Harlequins Centre, Exeter: Design and Access Statement (17161, 15th October 2019, Revision C02)*, four parts, place of publication and publisher not stated.

- Bennett, Francis and Batten, Kit 2011 *The Printed Maps of Exeter: City Maps, 1587–1901*, Exeter: Little Silver Publications.
- Bidwell, P.T. 1980 *Roman Exeter Fortress and Town*, Exeter: Exeter City Council.
- Blaylock, S.R. 1988 *Exeter City Defences: Excavation and Survey on the City Walls from the North Gate to the Castle, 1978-88, Part I: Roman*, Exeter Museums Archaeological Field Unit Report **88.13**. [also available online via ADS: https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1950-1/dissemination/pdf/City_Wall/City_Wall_Reports/88_13-Survey_of_the_Defences_1978-88.pdf].
- Blaylock, S.R. 1993 *Exeter City Wall: Fabric Recording at No's 43-49 Northernhay Street, 1992*, Exeter Museums Archaeological Field Unit Report **93.69**.
- Blaylock, S.R. 1995 *Exeter City Wall Survey*, Exeter: Exeter Archaeology, Exeter City Council and English Heritage. [also available online via ADS: https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1950-1/dissemination/pdf/City_Wall/City_Wall_Reports/Exeter_City_Wall_Survey.pdf].
- Blaylock, Stuart 1998 *Exeter City Wall*, Field Guide No. **12**, Exeter: The Devon Archaeological Society.
- Blaylock, S.R. 2014 *Exeter City Wall: Introduction to the Series of Exeter Archaeology Reports*, on the ADS website https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1950-1/dissemination/pdf/City_Wall/City_Wall_Reports/Exeter_online_archive_City_Walls_Introduction.pdf [comprises an overview of the project and some comment on more recent work, after 1995].
- Burrow, I. 1977 'The Town Defences of Exeter', *Report and Transactions of the Devonshire Association* **109**, 13–40.
- Fox, A. 1952 *Roman Exeter (Isca Dumnoniorum): Excavations in the War-Damaged Areas, 1945-1947*, Manchester: Manchester University Press.
- Gardner, Liz and Robinson Wild, Esther 2019 *Harlequins Centre, Paul Street, Exeter: Historic Environment Desk-Based Assessment* (Triskelion Heritage Report No. 18-8, October 2019; 3 volumes); place of publication not given.
- Gray, T. 2006 *Exeter Maps*, Exeter: The Mint Press.
- Henderson, C.G. 1984 'The Roman Walls of Exeter' *Devon Archaeology* **2**, 13–25.
- Holbrook, N. and Bidwell, P.T. 1991 *Roman Finds from Exeter*, Exeter Archaeological Reports **4**, Exeter: Exeter City Council and The University of Exeter.
- JLL 2019 *Planning Statement: The Harlequins Centre, Paul Street, Exeter, EX4 3TT*, Exeter: Jones Lang LaSalle IP, Inc.
- Leverett, M. 2009 *An Archaeological Watching Brief at Exeter City Wall, Maddocks Row, Exeter*, Exeter Archaeology Report **09.73**.
- LHC 2019 *Harlequins–Landscape and Visual Impact Assessment: Illustrative Photographic Views*, Exeter/Plymouth/St Austell: LHC Design.
- Meaton, Clive and Stubbings, Parris 2019 *Harlequins Centre, Paul Street, Exeter: Historic Archive Review* (CA Report: 880400.1, March 2019), Exeter: Cotswold Archaeology.
- Robinson Wild, Esther and Waite, Gerry 2019 *The Harlequins Centre, Paul Street, Exeter: Historic Environment Desk-Based Assessment, Volume 2: Addendum Impact Assessment For No. 42 Northernhay Street*, place of publication not given: Triskelion Heritage.

Stoyle, M. 2003 *Circled with Stone: Exeter's City Walls 1485-1660*, Exeter: University of Exeter Press.

Sworn, Simon 2019 *Harlequins Centre, Paul Street, Exeter: Archaeological Evaluation* (CA Report: 880385_1, April 2019), Exeter: Cotswold Archaeology.

On-line sources

Archaeology Data Service (ADS) digital repository for excavated archaeological sites in Exeter: https://archaeologydataservice.ac.uk/archives/view/exeter_parent_2015/.

ADS specific archive for Paul Street excavations (site no 76) of 1982–1986: https://archaeologydataservice.ac.uk/archives/view/exeter_76_2015/index.cfm.

ADS specific archive for Exeter City Defences, including links to reports cited here as Blaylock 1988; Blaylock 1993; Blaylock 1995; and numerous others: https://archaeologydataservice.ac.uk/archives/view/exeter_parent_2015/downloads.cfm?archive=Text&text=City_Wall.

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