



Historic England

Mr Matt Diamond
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Our ref: P01128814

22 JUne 2020

Dear Mr Diamond

**T&CP (Development Management Procedure) (England) Order 2015
THE HARLEQUIN CENTRE, PAUL STREET, EXETER, DEVON, EX4 3TT
Application No. 19/1556/FUL**

Thank you for your letter of 18 May 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's Advice

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. We provided a comprehensive response to the above application on 19 December 2019 raising a number of issues with regard to the development and its impact on the significance of Exeter's Historic Environment.

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 legislation and policy.

We welcome the most recent amendments which have sought to address our previous concerns. Nevertheless we consider that it is possible to achieve further reduction in the level of harm to Exeter's important historic environment. In order to assist in this regard we have identified a number of constructive solutions that would in our opinion reduce the harm caused in heritage terms. These would contribute to delivering a more successful version of the current scheme through a more sensitive response to the historic environment on and around the site. If all the changes we



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have suggested were to be made, then this would enable us to withdraw our concerns.

Our advice below reflects the changes made to the scheme subsequent to our advice of December 2019. This letter should be read alongside our earlier correspondence.

Significance

The redevelopment of the Harlequin site would affect a range of heritage assets in Exeter. Our earlier response contains a detailed explanation of their significance. We will not reiterate the whole of 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 to the proposed development have sought to respond to our previous advice. Historic England objected to the original proposals due to the following issues - massing, scale, modulation and design as well as the potential impacts on the city wall and within its setting, above and below ground. We identified that further consideration was required of these elements to enable the proposed development to respond more positively to the significance of the designated heritage assets referred to above.

In response to those comments, the applicants have provided the following revisions-

- a reduction in height of the proposed north-east range of both blocks reducing them from 8 to 7 storeys;
- the loss of a further storey from the south-west range of block 1 to 4 storeys set over a 2 storey colonnade;
- revisions to the treatment of the elevations to provide greater modulation within the design and materials;
- the removal of the glazed box.

Impact on designated heritage assets

Our advice focuses on how the proposal's response to the historic environment could ultimately assist the council and the applicant in achieving their aspirations for major redevelopment through a less harmful scheme in heritage terms.

We acknowledge that the scheme presents local benefits through the works along Paul Street to enhance the conservation area as well as the proposed landscaping along the city wall. However, we would still like to see the buildings respond more positively to their wider setting by taking further steps to reduce their impact. A series of recommended steps are set out in our advice below.



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Recommended Steps in relation to Massing, Scale and Modulation

The reduction in height of both blocks has reduced the overall scale of the development, which is positive. The conspicuous nature of the development within the conservation area could be further reduced through a gradual decrease in height across the site in line with its topography (Illustrative Viewpoint 3, 5 and 6 - LHC design Landscape Visual Impact Assessment May 2020). The revised profile could also address any visual interruption caused by the proposed development in views of the cathedral towers (Illustrative Viewpoint 3).

The following steps would in our opinion achieve this more positive result-

- Further reduction in height by approximately a storey of the north-east range of Block 2. It may be that a sufficient reduction can be made by reviewing and reducing the floor to ceiling heights. A more gradual decline in the scale of the development across the site will help to address the conspicuous nature of the development on the skyline. Importantly this change would also avoid potential visual impact on the cathedral tower, a spiritual reference point within the city, which would represent a significant improvement.
- The short range to the south-west of Block 1's north-east range, close to the city wall, creates a prominent feature above the existing buildings when viewed from the north-west, along Queen Street. We would encourage the applicant to remove a storey from this section of Block 1 in order to reduce its massing and bulk projecting into views along Queen Street. It may also help achieve a more successful transition between the Central and St David's Conservation Area.

Recommended Steps in relation to Treatment of Elevations

Our previous advice identified the need for the design to better reflect the character of the conservation area. The revised treatment of the elevations in the latest proposals has implemented different architectural approaches for each block to create individual buildings but with a cohesive visual appearance across the site. The amendments have also sought to address our comments by removing the glass box, which formed an overly conspicuous element of the previous design. Also we consider that the choice of materials now better reflects the architectural palette of the conservation area.

The Central Conservation Area (Area 3: High Street and Guildhall) is characterised by established civic buildings. These buildings have a cohesive architectural appearance using a limited number of materials in their construction. The vertical breaks between the buildings help to define the historic plots within the conservation area. The windows and openings form a regular pattern across the elevations of the buildings, often decreasing in size vertically which creates a sense of hierarchy within the facade looking up the building. By utilising characteristics from the surrounding architecture as well as creating a more active frontage, the proposed development, which represents a considerable new addition to the Central Conservation Area, would better respond to its character and appearance.

The following steps would in our view assist in facilitating that improvement -



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Block 1

- Simplification of elevational treatments – By simplifying the material palette and the number of openings, Block 1 would become less visually conspicuous. This could include -
 - Applying horizontal banding to the building's facade to create the appearance of a vertically decreasing hierarchy of levels up the elevation of the North East range.
 - A single vertical band to divide the brick panels along the south-west range. This would better reflect the former historic plot sizes of the conservation area. This vertical division could extend into the design of the roof, emphasising the visual divisions across the building.
 - Consideration should be given to consolidating the openings within the brick panels. The creation of a continuous section of vertical glazing, through the amalgamation of the windows and glazed panels, will again simplify the design.
 - Reduction in the number of materials used in the elevation.
- Creation of a more active ground floor frontage at the corner of Paul Street and the “urban oasis garden” (leading under the colonnade). A more engaging frontage would enhance the experience of entering the site and create a more attractive gateway into the newly landscaped area and the approach to the city wall.
- The choice of materials will be fundamental to the success of any design on this site. We advise that high quality materials should be selected and that they should reflect the colours and textures of the materials found within the historic buildings that characterise the conservation area. Historic England remains unconvinced at this stage that a green roof in this location would reflect the character and appearance of the conservation area.

Block 2

- A more active frontage along Paul Street. Although it forms the back of house area to the hotel and car-park, greater visual interest could be created along its length, possibly through the inclusion of public art or recessed false window openings.
- Again the choice of materials will be fundamental to the success of any design on this site. We advise that high quality materials should be selected and that they should reflect the colours and textures of the materials found within the historic buildings that characterise the conservation area.

Recommended steps in relation to below ground archaeological remains

No further information has been submitted in relation to the extent of survival of below ground archaeological remains. The conceptual model presented in the Historic Environment Desk Based Assessment Vol 2, concedes that it presents assumptions regarding the level of survival on the basis of the limited area of archaeological investigation conducted in a scientific manner. It also identifies that there are potential pockets of archaeological survival between the existing piles from the 1980s development. Consequently we remain of the opinion that there are likely



to be surviving archaeological remains within the development area of national importance and as a result that there is a need for additional targeted archaeological work. This will assist in understanding the potential below ground impacts, enabling sufficient steps to be taken to reduce the potential for unknown risks and to identify the most suitable foundation design with the aim of preserving archaeological deposits of national importance. This is in line with the NPPF (Para 189, 190 and 194, NPPF), and Historic England's published Piling and Archaeology (2019) and Preserving Archaeological Remains (2016) guidance.

Historic England considers that ideally this information should be submitted prior to determination. However, it will be for the council to decide in consultation with its own heritage specialist, whether they consider the additional targeted archaeological work should form part of the approach to the detailed design and approval of foundations in the event consent is granted. Regardless, this work should include the following stepped approach to assess the conclusions of the conceptual model (set out in our advice of 19 December 2019) -

- 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.

Recommended steps in respect of the scheduled wall

Physical Impacts

A robust assessment considering the potential impact of the proposed development on the condition of the wall should be provided. This is in order to understand the effect of environmental changes through overshadowing and movement of air. The assessment should include further detailed explanation to support any conclusions and specialist expertise should be used where required. At present this is not included in the Historic Environment Desk Based Assessment Vol 2. This information is requested to help inform opportunities to avoid and minimise any potential impact (Para 190, NPPF).

We would also highlight that early consideration will need to be given to the potential impact of vibration on the wall through the construction phase and appropriate safeguards included in the environmental management of the scheme. The recent collapse of a section of the city wall, on the opposite side of the Iron Bridge close to the application site, illustrates that the monument is fragile. The proposal includes a 500mm gap between the wall and any construction work. We advise that any such gap will need to ensure that access to the wall can be gained during the construction programme to enable it to be monitored and appropriately safeguarded.

Due to the proximity of the works to the wall, we would expect to see some conservation works proposed to consolidate its fabric. An existing project is currently



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under consideration by the Council and Historic England for the conservation of the entire scheduled monument. The council may consider it appropriate as an alternative therefore for S106 funding to make a contribution to this wider project since the intentions are aligned. Regardless we would expect the council to ensure that this positive consolidation work to the scheduled city wall within the development site is undertaken. Such works would require scheduled monument consent (SMC).

Setting

Historic England supports the proposed improvements within the setting of the city wall through the creation of the new walk adjacent to the structure.

We recommend the following steps to maximise the intended enhancement to the setting of the scheduled wall. We consider that breaking up the expanse of blank wall on the north-west elevation of the perpendicular range of Block 2 through the incorporation of recessed panels or horizontal banding, to mirror the decreasing hierarchy of levels up the historic buildings within the conservation area, would improve this element of the design. The stairwell at the north corner of the north-east range also offers a further opportunity for inclusion of some carefully located openings to help create the more active frontage we have advocated for. We have some concerns about the success of a green wall and would therefore recommend that some architectural interest is added to the design so that in the event it does not establish well the wall would not revert to being a blank uninteresting façade. In our opinion, these steps would help to maximise the benefits offered by the improvements and enhancements proposed immediately around the wall in the interests of enhancing and better revealing the significance of the scheduled city wall (Para 200, NPPF).

National Legislation, NPPF and Local Policy

We have set out in more detail the relevant legislation and policy context in our letter of 19 December 2019. We would reiterate here the range of heritage assets affected by this application including a scheduled monument and Area of Archaeological Importance, a Grade I listed building, and conservation areas.

Our advice has focused on the opportunities to avoid and minimise harm through the proposed development (Para 190, NPPF). We have encouraged the maximisation of opportunities to enhance or better reveal the significance of the surrounding heritage assets (Para 200). In our view, the additional steps we have recommended will contribute to achieving a better balance in planning terms in relation to the historic environment.

Historic England's Position

Historic England appreciates that the site presents a major opportunity for redevelopment within Exeter's historic City Centre. In our view, a development can be delivered that responds positively to the sensitivities of the historic environment within the site and its surroundings.

With that in mind, we have recommended a series of further steps to amend the current design that we consider would address our outstanding concerns in heritage terms. With all developments in sensitive historic areas, it is important to try to



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identify the least harmful and most sensitive solution, while trying to maximise opportunities to reveal and enhance the significance of the heritage assets affected. If all the recommendations set out above were to be addressed then we can confirm that Historic England would be able to remove our concerns in respect of this application on heritage grounds.

However, we are aware from our continued discussions with the council that questions regarding financial viability may be raised in relation to amending the scheme. This is a matter for the council to address with the applicant. However, achieving a further meaningful reduction in height either through the loss of further rooms or through the revision of floor to ceiling levels, will provide the greatest improvement to the scheme in terms of its impact on the wider historic environment. It will be for the council to consider any questions regarding the viability of the scheme within the planning balance.

Notwithstanding the recommended further reduction in mass, steps to enhance the treatments of the elevations also remain important in responding sensitively to the surrounding heritage assets. The steps identified will allow the structures to better respond to the character and appearance of the conservation area and the setting of the scheduled wall.

Some areas of further information are required relating to the scheduled wall and to guide treatment and minimisation of impact on below-ground archaeological remains. It will be for the council to decide at what stage this information is necessary. These elements will assist the applicants and the council in minimising the unknown risks associated with the potential impact of the development on these nationally important heritage assets.

The council should also ensure that positive consolidation works are undertaken to the wall as part of the proposed development, regardless of whether they are achieved as an integrated part of the scheme or through S106 contributions.

Recommendation

Historic England welcomes the recent amendments to the scheme, but has some remaining concerns on heritage grounds.

Our advice above sets out the reasons for those remaining concerns in conjunction with constructive recommendations about how they could be addressed with further modifications. We have provided this advice in the interest of assisting the council and the applicant in achieving a more sensitive development in heritage terms.

We would recommend that the council discuss the proposed additional amendments with the applicant in the interests of minimising conflict between the historic environment and the significance of the heritage assets affected (NPPF 190) and maximising the potential to enhance and reveal significance (NPPF 200). They will need to ensure that great weight (NPPF 193) is given to the significance of the heritage assets affected in order to deliver a sustainable scheme that offers balance in Historic Environment terms to provide a sustainable development as outlined in the NPPF (Para 8).



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If these changes are implemented fully, then we recommend that this would address our outstanding concerns regarding the proposed scheme.

Historic England would be pleased to have the opportunity to continue to engage with the council and applicant to assist in achieving a solution for the site that provides it with a long term sustainable approach in relation to the historic environment.

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 and 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

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cc. Andy Pye, Exeter City Council



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