

Planning Statement

The Harlequins Centre, Paul Street, Exeter, EX4 3TT



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1 Introduction

- 1.1 This Planning Statement has been prepared by JLL on behalf of the client, Curlew Alternatives Property LP, to provide support to a full planning application for the demolition and redevelopment of the existing Harlequins Centre, Paul Street, Exeter, EX4 3TT.
- 1.2 It should be read in conjunction with the application plans, elevations and supporting documents, which are listed in Appendix A.
- 1.3 The subject site is located within Exeter's city centre and falls within the administrative boundary of Exeter City Council (ECC). The full planning application provides for:

Demolition of existing Harlequins Shopping Centre and pedestrian bridge over Paul Street. Making good of the façade of the Guildhall Centre, after removal of the pedestrian bridge. Refurbishment of the upper floors of 21-22 Queen Street to provide Co-Living¹ (sui generis) accommodation. Erection of two blocks accommodating 298 Co-Living bedspaces and associated amenity areas, a hotel (Use class C1) with 114 bedrooms and associated space including bar and restaurant. In addition, a car park with 42 spaces, an interactive display space for the interpretation of the heritage of the site and surroundings, enhancement of the urban realm on the adjacent highways and on-site landscaping.

- 1.4 The site is an existing shopping centre, predominantly built in the 1980s as a covered shopping mall with a direct pedestrian link, across Paul Street, into the adjacent Guildhall Shopping Centre. In addition to the pedestrian link, a vehicular link is accessed from Paul Street, spirals through the Harlequins Centre and up to the car park located on top of the Guildhall. This ramp is the only vehicular link to that car park and as such needs to be retained in any development. Similarly, the site links through to Queen Street and includes Nos 21-22 which retain the original 18th Century façade, which will be retained during redevelopment.
- 1.5 The Retail Study prepared in considering the future of the site (Included as Appendix B) confirms that, in line with wider negative trends in retailing, the Harlequins Centre has declined in popularity and a number of units within the centre have been vacant for many years, even prior to potential redevelopment plans being raised. The popularity of the competing Princesshay shopping centre to the north and the convoluted layout of the Harlequins Centre itself have led to its decline as a shopping location.
- 1.6 Over the same period the need for residential accommodation of all kinds within the city has increased, as has the popularity of the city as a focus for tourism, whilst at the same time the council has increasingly struggled to deliver its supply of housing land.
- 1.7 It is therefore proposed to demolish the whole of the Harlequins Centre erected in the 1980s, whilst retaining the vehicular ramp to the Guildhall and the building at No21-22 Queen Street. In its place, it is proposed to erect two buildings which will accommodate two different forms of flexible residential accommodation. The first, a more traditional use, is for a hotel with residents bar and restaurant, which

¹ A sui generis flexible residential use that is a form of community housing where residents have their own bed rooms but share central purpose built communal kitchens, living rooms etc.

will provide 114 beds in a very sustainable location when applying the relevant policy criteria outlined in the National Planning Policy Framework (2019) (“NPPF”).

- 1.8 The second main element of the proposal is for 298 Co-Living units. This is a new approach to providing accommodation and this will be the first example of its kind in Exeter. The model provides independent living, where each resident has their own room with basic amenities including bathroom and often kitchenette, but they then share common spaces such as lounges, TV rooms, gyms etc... with the wider community living in the building. The product is targeted at freelance workers, people who are working away from home as well as young professionals who are looking for the next step from student life to “the real world” and would traditionally have sought a room in a shared house. It is open to all ages of people who are looking for good quality, flexible accommodation and is seen as an attractive alternative to traditional HMO style of accommodation.
- 1.9 The Harlequins Centre Co-Living scheme will provide 298 beds in total, across a number of apartments between the two separate buildings. In relation to the housing delivery test (Housing Delivery Test Measurement Rule Book July 2018), which the government calculates each year, this would equate to a total of circa 165 dwellings to be delivered within the city.
- 1.10 The Co-Living scheme will therefore provide a new form of flexible accommodation in high quality bespoke units that meet the needs of a specific sector of the local community, which will predominately be the young and others who are in a transition phase of their life and may, with good quality accommodation, be attracted to remain in Exeter city centre and thereby contribute to the local economy.

Environmental Impact Assessment

- 1.11 The Harlequins Centre lies within the centre of the city, with excellent transport links via all modes (Public transport, walking and cycling as well as the private car) and is a previously developed site. Therefore, the principle of its redevelopment would be in line with national and local policies. However, the development is in an area of known archaeological potential due to the historic uses of the site and the city wall (a scheduled monument) is located immediately to the west of the site. It is also within a Conservation Area and close to a number of listed buildings and the Scheduled Park and Garden at Northernhay.
- 1.12 This planning application is therefore supported by a full suite of environmental reports providing evidence of the impacts of development on the vicinity. A full list of this supporting material is included at Appendix A.
- 1.13 Given the scale of development the need for a formal Environmental Impact Assessment (EIA) has been considered due to the potential for the proposed development to meet the criteria set out in Schedule 2 of the 2017 Regulations.
- 1.14 A formal request for a Screening Opinion was sent to Exeter City Council on 8 October 2019, based on a scheme comprising two buildings with Co-Living accommodation (approx. 320 bedrooms) and hotel (approx. 120 bedrooms), together with associated parking, landscaping and public realm improvements on a site of 1.05ha. The council confirmed by letter dated 28th October 2019 that the scheme is not considered to fall within the scope of formal Environmental Impact Assessment (EIA).

- 1.15 The planning application actually comprises of 298 Co-Living bedspaces, and a hotel with 114 bedrooms on a site of 1.04ha; the application is therefore slightly smaller than the scheme which informed the screening process. It is considered that the EIA screening opinion is still valid for this application as the Council have considered the impacts of a scheme which was slightly larger than is finally submitted but is of a similar scale and the same character, on the same site. The Council confirmed this in email correspondence dated 01 November 2019. It is therefore considered that the submitted scheme does not constitute 'EIA development' and an Environmental Statement is not required.
- 1.16 As a result, a formal EIA has not been provided as part of the submission. However, a full range of documents and reports has been provided in order that the full impacts of development can be judged as part of the planning process.

Structure of Statement

- 1.17 This planning statement is presented in support of the application and draws on all of the evidence documents submitted with this application and listed in Appendix A.
- 1.18 The structure of this report includes a site description, key planning considerations for the development of the site, and is structured as follows:
- Section 2 – describes the site and surrounding area
 - Section 3 – sets out the development proposals
 - Section 4 – outlines relevant planning history
 - Section 5 - sets out planning policy relating to the proposals
 - Section 6 – provides an analysis of the planning considerations
 - Section 7 – sets out the conclusion

2 Site Context

The Harlequins Centre Location and Setting

- 2.1 The application site address is The Harlequins Centre, Paul Street, Exeter, EX4 3TT.
- 2.2 The site is shown edged red in the site location plan and extends to a total of just under 1.04ha. It is within the central area of Exeter city with a frontage to Queen Street, as well as Paul Street, which are main highways within the city centre.
- 2.3 The site is on the edge of the established primary shopping frontages of the city, which is dominated by High Street, which is approximately 200m from the site to the south east and Princesshay Shopping Centre, located at the northern end of High Street (circa 300m from the edge of the Harlequins Centre site).
- 2.4 To the north west, the properties are primarily residential, backing on to the application site and fronting on to Northernhay Street. A small pedestrian route, Maddocks Row, links through from the rear of the application site to Northernhay Street at its northern end.
- 2.5 Beyond the residential area around Northernhay Street, the area is dominated by the buildings of Exeter College, the Rougemont Hotel and Exeter Central Station, which is less than 150m to the west, along Queen Street. This is also a main bus route with a number of services linking to the city centre.
- 2.6 The site is therefore accessible by a variety of modes of transport, including rail, bus, foot and cycle, as well as the private car. The site itself has a car park for circa 90 cars, accessed from Paul Street, whilst there is a further car park, on top of the adjacent Guildhall Shopping Centre, where there are circa 440 spaces accessed via a ramp which crosses the Harlequins Centre site.
- 2.7 The vehicle ramp to the Guildhall Centre is accessed from Paul Street at the Harlequins Centre boundary and loops around, crossing the application site, but is owned by a third party and is to be retained as part of any proposals and has to be operational throughout any redevelopment phase.
- 2.8 In addition to the vehicular link, there is also a pedestrian link from the Harlequins Centre directly into the Guildhall Centre by way of an elevated walkway across Paul Street.

Site Description

- 2.9 The site is presently occupied by the Harlequins Centre which is a small shopping centre built between 1984 and 1986. The centre is generally of contemporary design, of red brick with tile roof and aluminium windows and doors.
- 2.10 The exception to the contemporary design from the 1980s is the facade which fronts on to Queen Street (Nos 21-22). The building was substantially rebuilt as part of the redevelopment of the Harlequins Centre in the 1980s. However, it appears that the façade to Queen Street was retained. The unit fronts on to Queen Street providing retail accommodation at the ground floor (previously occupied by Poundland) and ancillary accommodation above. This unit was subject of a recent change of use application (Ref 19/1070) for the relocation of a hearing centre from the Harlequins Centre into the ground floor following the closure of the Poundland. This application was approved on 13 September 2019.

- 2.11 The majority of the Harlequins Centre buildings are orientated parallel with Paul Street, which drops down along its length from its junction with Queen Street at the north east corner, down to the junction of North Street/Bartholomew Street East/Iron Bridge at the south west end. This fall means that the building at the main entrance at the north-east end of the site is at grade with the highway, but at the south-west end of the site the building has a basement car park and further levels of accommodation (currently occupied by a gym) below the main retail floor level.
- 2.12 The south-west end of the site is occupied by a surface car park, which shares a vehicular access from Paul Street with the basement car park which is under the main building and also the service yard, which wraps around the rear of the building.
- 2.13 The service yard provides access to the shopping centre and is dominated by hardstanding (pavers and tarmac). The only vegetation is found to the south west of the site, within the surface car park, and along the edge of the site with the adjacent city wall.

3 Proposed Development

The Harlequins Shopping Centre

- 3.1 An Exeter Retail Review was prepared as part of the evidence base for considering the future of the Harlequins Centre and is included as Appendix B to this Planning Statement.
- 3.2 The review concluded the Centre has performed poorly as a retail centre for many years and its future does not lie as part of the primary retail frontage, it also forms a very small percentage of the overall retail offer in the city. As a result, it is proposed to demolish the whole of the Harlequins Centre which was built in the early 1980s and the loss of this retail floorspace not have a material impact on the viability of the town centre (as discussed in Appendix B and Section 6.1).

Scheme evolution

- 3.3 A full description of the evolution of the scheme is provided in the submitted Design & Access Statement at Section 3. The applicant, Curlew Alternatives Property LP purchased the centre in mid-2018, and at the time of the site sale, a scheme was prepared by the previous owners to provide student accommodation in a single low block fronting Paul Street.
- 3.4 That scheme was submitted to the Council for a Pre-Application response and it was made clear that the officers had significant concerns regarding the proposed layout. Therefore, the Curlew design team undertook a thorough review of the existing site and very quickly identified that the scale of the existing building, with large blank facades to Paul Street, along with a similar brutalist approach of the Guildhall Shopping Centre on the opposite side of the road, created a very poor (canyon like) character for the important route.
- 3.5 Reflecting advice from the Council's officers, the initial focus for the redevelopment scheme was to maximize the external space created at the ground floor, so as to enhance the experience along Paul Street. As a result, the initial scheme options proposed two tall "towers" one either side of the Guildhall Shopping Centre access ramp, which was required to be retained.
- 3.6 This initial approach, of two tall (circa 20 storey) towers, was considered at a concept stage but the approach was subsequently amended to schemes of 18 and 13 storeys before a proposal which included two blocks of circa 11-12 storeys was arrived at. This initial layout provided for circa 320 student accommodation bedspaces, and a 170-bed hotel. This scheme was presented to the Design Review Panel in December 2018. The Panels comments are provided within the Design & Access Statement but in summary were broadly very positive and commended the approach taken.
- 3.7 The same material was also presented to Historic England as part of a formal Pre-Application process with them and was discussed at a site meeting held in early 2019. The written response from Historic England raised concerns regarding the impact of the proposed development on the setting of the City Wall, the Central and St David's Conservation Areas and historic buildings notably the Cathedral.
- 3.8 Consequently, the scheme was further amended, and the revised scheme was subject of public consultation during June 2019. At this time the proposals were presented to the City Council Planning Members' Working Group and resubmitted to Historic England. The presented scheme included a 10-

storey block accommodating 315 student beds and a second block of 9 storeys (plus basement parking) for a 140-bed hotel with 23 studios for student accommodation.

- 3.9 The key concerns expressed during the public consultation are discussed in the Statement of Community Involvement submitted with the application but can be summarised as focusing on the height of the buildings and the use of the northern block, at Queen Street, for student accommodation.
- 3.10 Further comments in regard of the scheme issued for public consultation were received from Historic England. This focused on the scale of the building and impacts on heritage assets. In response to these concerns an options document was presented, which is replicated in the Design & Access Statement section 3. This options document considered three broad approaches to the development of the site, Option 1 proposed two very tall towers, whilst Option 2 proposed a development of up to 4 storeys, whilst Option 3 reflected a midpoint with building of up to 11-12 storey in height.
- 3.11 The benefits of each option were considered in a tabular form and demonstrated that the tall option produced benefits at the ground level by creating space and opportunities for enhanced public realm. However, it had negative impacts in terms of views of key historic landmarks and on adjacent dwellings. Option 2, which was lower, extended the footprint of the building significantly in order to achieve the same floorspace. The result of this was that it became less prominent in wider views. However, the increased footprint resulted in greater impacts on Paul Street and immediate neighbours, as well as requiring development in previously undisturbed areas, potentially resulting in negative impacts on buried archaeology. The study therefore recommended a middle route, Option 3, which would be visible from some viewpoints but would provide for a good quality public realm and minimised impacts on immediate neighbours.
- 3.12 The representative for the statutory consultee, Historic England did not agree with the assessment and concluded that Option 2 would be (in its view) the only way of delivering the development. That scheme would involve a low building which would not be visible from any viewpoints and so have no impact on views of key landmarks such as the cathedral. However, this approach only benefits the consideration of historic views and does not adequately balance other important considerations. For example, it could have a detrimental impact on buried archaeology as well as having a negative impact on the amount of open spaces and the amenity of neighbours due to the proximity of built development to site boundaries.
- 3.13 Subsequent discussions with planning officers have confirmed that the approach, as set out in Option 2, of a low but high-density scheme, would not be acceptable and would not be supported due to the negative impact on neighbours and on the character of Paul Street. However, concerns over the height of the buildings as set out in for Option 3 were also identified and, as a result, a further 2 floors were removed from Block 2, and one full floor from Block 1, along and cutting back of Block 2 at its southern end. These further changes have all been actioned since the submission of the scheme to Historic England. This is documented in the Design & Access Statement at Section 3.

The Proposed Development

- 3.14 The proposed development involves the demolition of all of the existing Harlequins Centre which was built in the mid - 1980s, save for the retention of a small part of the existing building (Nos 21-23 Queen Street) which predates the more modern centre, and the proposed erection of two new blocks, fronting onto Paul Street.

- 3.15 The building fronting Queen Street (Nos 21-22) will be the only existing building to be retained. The change of use application (Ref 10/70) to allow for the relocation of Chime, a hearing centre, to the ground and part first floor of the amended building was approved on 13 September 2019.
- 3.16 Nos 21-22 Queen Street comprises a total of three storeys with the two upper floors not to be occupied by Chime and are included in the wider redevelopment of the site, with the new uses extending into this building to provide access to these upper floors.
- 3.17 The wider proposal seeks to introduce a mix of uses across the site with purpose-built Co-Living accommodation in one building and a combination of hotel and Co-Living accommodation in the other. The two buildings will be split either side of the Guildhall Car Park access ramp, which has to be retained in order to provide access to the adjacent car park.
- 3.18 The comprehensive redevelopment of the site will improve the efficiency and density of development available on the brownfield site, as well as creating benefits in regard of the character of the vicinity, notably Paul Street.

Building One – Co-Living

- 3.19 Building One is situated to the northeast of the site and is proposed to provide 277 Co-Living bedrooms, split across 17 accessible bedrooms, 75 studio bedrooms and 185 cluster bedrooms. Co-Living (sometimes referred to as Purpose Built Shared Living space (PBSL)) is an emerging hybrid living model and as such, there is no formal definition of this within planning legislation such as the *Town and Country Planning (Use Classes) Order 1987* or the National Planning Policy Framework (NPPF) (2019) and this would be the first example of its kind in Exeter.
- 3.20 Co-Living schemes are described further in a separate briefing note submitted with this application and the characteristics of this scheme are illustrated in the Design & Access Statement but in brief the use provides a purpose-built living space, designed to deliver quality serviced accommodation in convenient urban locations.
- 3.21 Co-Living schemes are designed for mobile young professionals, freelancers or people working on short-term contracts, and can be used as a steppingstone between temporary rented accommodation and a more permanent home.
- 3.22 The unique element of Co-Living is that it is a form of shared housing that combines smaller private living spaces with larger shared communal facilities. Each resident will have a lockable private room with an en-suite, however the other areas such as a kitchen or lounge area are generally shared dedicated amenity areas. Co-Living schemes also usually incorporate additional facilities and amenities setting them apart from standard residential schemes.
- 3.23 The shared spaces are designed to facilitate communal activities organised by the residents which promote relationship building and social engagement between them. This then forms a sense of community for residents and has well-being advantages, in addition to the networking opportunities and increased engagement and interaction.

- 3.24 The whole of Building One will be designed and dedicated for Co-Living, with a mix of studio apartments and individual bedrooms clustered into “residential units” with shared facilities that then benefit from wider communal amenity space.

Building Two – Hotel and Co-Living

- 3.25 Building Two, situated to the south of site, will be occupied by a 114-room hotel with a further 21 Co-Living bedrooms, split across 18 studio bedrooms and 3 accessible bedrooms. The two uses would have separate access points fronting onto Paul Street and the residents in the Co-Living units would benefit from the communal facilities provided within Block One, as well as the amenity spaces within their own apartments.
- 3.26 Within Building Two there will be a restaurant and bar for use pre-dominantly by the hotel residents].

Car Parking and Servicing

- 3.27 Vehicular access to the site will be limited to cars, utilising an access point at a similar location to the existing, which will serve a basement car park which will accommodate 42 car parking spaces. These spaces will include 2 Electric Vehicle Charing Points and 4 disabled spaces. Within the car park, up to 10 spaces will be dedicated to a local business which currently has spaces within the site and which need to be re-provided as part of the proposed scheme and 6 cycle parking spaces which will be available for hotel users and staff.
- 3.28 Cycle parking for residents of the Co-Living accommodation will be provided on the ground floor of Block One. A total of 174 spaces will be provided within the building, with 6 additional spaces for guests, located outside and a further 16 spaces located on Paul Street.
- 3.29 Servicing of the buildings will be via two dedicated laybys off Paul Street, which will be created through the widening of the pavement and thereby the reduction in carriageway width for the length of the road. Bin stores for waste and recycled material will be provided close to the servicing bays and waste collection regimes have been discussed with and agreed by officers of the City Council. Weekly bin collections will be made, utilising the on-street parking bays provided.

Energy and sustainability

- 3.30 The scheme has been designed in line with the basic principles of the Energy Hierarchy which are “Be Lean, Be Clean, Be Green’. In order to achieve this and in line with this hierarchy, schemes should use less energy in the first instance, then seek to use the energy that is required efficiently and then use renewable energy to supplement the former points.
- 3.31 Both the Co-Living spaces and the hotel are anticipated to have near constant demands for domestic hot water, and Combined Heat and Power Units (CHP) systems are well suited to buildings that have such an energy demand. Gas-fired high efficiency boilers with CHP serving radiators are proposed for heating for the Co-Living elements of Block 1 and 2, whilst direct gas-fired hot water cylinders with CHP will be used for domestic hot water supply in both the Co-Living and Hotel schemes.
- 3.32 Block 2 will incorporate solar Photovoltaic (PV) panels to offset the electricity consumed on site and reduce part of the carbon emission associated with the development.

- 3.33 Given this hierarchy and reflecting the highly sustainable nature of this location and the characteristics of the proposed buildings and landscaping, a BREEAM pre-assessment has been undertaken and a score of Excellent has been achieved for both buildings. This assessment will continue through the life of the project, in order that the scheme does achieve this Excellent Rating.

Landscaping and public realm

- 3.34 The proposal looks to improve the existing streetscape and highways along Paul Street and Queen Street with a focus on shared surface and improved pedestrian permeability and active frontage. In addition, the land at the junction of Paul Street and Iron Bridge is proposed to be laid out as a “pocket park” removing the former car parking and increasing the level of planting and informal recreation space.
- 3.35 The proposal looks to introduce several new high-quality public realm spaces and to enhance pedestrian access and experience of the existing City Wall. This includes the landscaping of external areas around and between the buildings and also the creation of a small exhibition space within the public area where interpretation material will help individuals to understand the history of the site and notably the City Wall.

4 Site Planning History

- 4.1 The planning history records in Table 1 show that the site has been used as a shopping centre since it was first constructed in the 1980s. A search of Exeter City Council's statutory planning register revealed that there have not been any applications for alternative uses at the site since the original permission, and all of the applications are in line with the retail use.
- 4.2 Application no1. (ref 19/1070/FUL) relates to the relocation of Chime, the current occupiers of Unit 16 within the Harlequins Centre.
- 4.3 Chime provide NHS Audiology Services for NHS Devon - Mid, East and the Exeter areas, and have a long lease within the Harlequins Centre. In order to facilitate their continued operation, Chime have been offered an alternative location on the adjoining street, Queen Street. Unit 21-22 fronts on to Queen Street and provides retail accommodation at the ground floor (previously occupied by Poundland) and ancillary accommodation above.
- 4.4 This unit was identified as a suitable replacement unit for Chime, however change of use of the unit was required as it is currently in retail use (Class A1) whilst the hearing centre is considered a D1 use. The planning application also allowed for internal changes and amendments to the frontage.
- 4.5 The application (ref 19/1070) was granted on 13 September 2019 subject to conditions, including a pre commencement condition stating that no development related works shall take place within the site until a written scheme of archaeological work has been submitted to and approved in writing by the Local Planning Authority , and that the flat roof area to the rear of the property shall not be used for any purpose other than for access to maintain the building, plant and machinery.

Table 1 – Planning history records for subject site

No.	Reference	Site Address	Description of Development	Decision
1.	19/1070/FUL	21-22 Queen Street, Exeter, Devon, EX4 3SH	Change of use of building from Retail (Use Class A1) to a hearing test centre (Use Class D1) including division of existing retail unit, internal refurbishment and change to shop front	Granted 13 September 2019
2.	16/1784/FUL	The Emporium, The Harlequin Centre, Paul Street, Exeter, EX4 3TT	Change of use of 5 no. retail units (A1 use) and communal access area to create 326 sqm. gymnasium (D2 use)	Granted 7 October 2016
3.	15/0783/FUL	20A The Harlequin Centre Paul Street Exeter EX4 3TT	Change of use to clothing retail and tattoo studio (Suis Generis)	Granted 26 August 2015
4.	13/4157/FUL	1 Paul Street, The Harlequin Centre Exeter EX4 3TT	Installation of shopfront, one air conditioning unit and two satellite dishes	Granted 24 October 2013
5.	13/4155/ADV	1 Paul Street, The Harlequin Centre Exeter EX4 3TT	Four internally illuminated signs	Granted 18 November 2013
6.	04/0559/ADV	The Harlequins Centre, Paul Street, Exeter, EX4 3TT	Internally illuminated hanging entrance signs	Granted 28 May 2004
7.	03/1725/FUL	Emporium, The Harlequin Centre, Paul Street, Exeter, EX4 3TT	Change of use from retail (Class A1) to food and drink (Class A3) on lower ground floor	Granted 17 December 2003
8.	97/0754/FUL	12 The Harlequin Centre Paul Street Exeter EX4 3TT	External air conditioning units on rear elevation	Withdrawn 24 November 1997
9.	93/0219/ADV	Food Court, The Harlequin Centre, Paul Street, Exeter, EX4	Display of two internally illuminated and one non-illuminated signs	Withdrawn 25 August 1993
10.	93/0114/FUL	Food Court, The Harlequin Centre, Paul Street, Exeter, EX4	Alteration and change of use of food court kiosks and shops to restaurant/bar (lower ground floor)	Withdrawn 25 August 1993
11.	93/0360/FUL	The Harlequins Centre, The Harlequin Centre, Paul Street, Exeter, EX4	Alteration of existing staircase, construction of new staircase to connect lower ground car park to lower food hall and alterations to car park	Granted 6 July 1993
12.	93/0327/FUL	The Harlequins Centre, Paul Street, Exeter, EX4	Construction of an external fire escape on north side of centre to facilitate the use of the lower ground floor as a restaurant	Granted 7 June 1993
13.	92/0924/FUL	The Harlequins Centre, The Harlequin Centre, Paul Street, Exeter, EX4	Change of use and alterations of Food Court kiosks and shops to restaurant/bar	Refused 4 February 1993
14.	87/0186/ADV	Unit 1, The Harlequin Centre, Paul Street, Exeter, EX4 3TT	Two illuminated signs	Granted 14 April 1987

5 Planning Policy

- 5.1 This section provides an overview of the relevant planning policy framework in which any proposed scheme would be assessed. All development should be in accordance with the statutory development plan unless material considerations indicate otherwise as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 5.2 The National Planning Policy Framework (NPPF) must be taken into account in preparing a development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 5.3 The statutory development plan, against which any application would be considered by Exeter City Council, comprises the following:
 - Local Plan First Review 1995-2011; and,
 - Core Strategy Development Plan Document.
- 5.4 The Local Plan First Review 1995-2011 was adopted by ECC on 31 March 2005.
- 5.5 The Core Strategy Development Plan Document (DPD) was formally adopted on 21 February 2012. However, this only partially replaced the policies of the Local Plan and the council embarked on the preparation of a replacement development management focused document, the Development Delivery DPD which reached publication stage in July 2015. However, the DPD has not been submitted to the Secretary of State. The process was halted due to proposals to prepare a wider strategic plan for the sub region, the Greater Exeter Strategic Plan (GESP). The Council consider that, whilst the Development Deliver DPD has not yet been adopted, the publication version represents a material consideration that should be given some but limited weight in the determination of applications as it has reached an advanced stage of preparation.
- 5.6 It was intended that the GESP would provide the strategic planning framework for Exeter and its sub region (Including East Devon, Exeter, Mid Devon and Teignbridge District councils (excluding Dartmoor National Park), setting the housing numbers and distribution as well as identifying strategic development locations. An initial Regulation 18 consultation was held in early 2017 and a first draft plan was intended to be issued in summer 2019. However, this plan has also recently stalled, and it is now proposed that a draft plan will not be prepared until late 2020.
- 5.7 In the meantime, the Secretary of State has confirmed that the majority of the Local Plan First Review policies have been saved until they are replaced, and these policies, along with the Core Strategy, continue to form the relevant statutory development plan documents, until replacement documents are adopted. In addition, the Council considers that the policies of the Development Delivery DPD have some (although limited) weight in decision making as the plan reached an advanced stage of preparation even though it has not been adopted. Given the age of the applicable Development Plan documents, the policies within the National Planning Policy Framework (NPPF) provide the most up to date statement of policy and is a material consideration that carries more weight in any decision making.
- 5.8 More recently the Council has issued its “Liveable Exeter” vision. This was launched in spring 2019 and sets out a vision for the future of the city which includes the redevelopment of a number of key sites,

including the Harlequins Centre. The document is not, however, a planning policy document and the Council made this clear in its announcement. It has no planning status and therefore is not included within the Development Plan. It does however show the Council's "direction of travel" and aspiration and it will, no doubt, inform part of any future Local Plan. However, it currently does not have any planning status and cannot be given any weight in a determination.

National Planning Policy

- 5.9 The current national planning policy for England consists of the revised NPPF, which was published in February 2019, and sets out the central Government's planning policies for England and how these are expected to be applied. This supersedes previous versions of the NPPF.
- 5.10 As previously stated the (NPPF) must be taken into account in preparing the development plan and is a material consideration which must be taken into account and given appropriate weight when determining planning decisions.

Sustainability

- 5.11 At the heart of the NPPF is the presumption in favour of sustainable development, which the NPPF states in paragraph 11 should be applied to all plan-making and decision-taking process. It goes on to specifically notes that:

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or,

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 5.12 In paragraph 8, the NPPF outlines that there are three overarching objectives to sustainable development '*which are interdependent and need to be pursued in mutually supportive ways*'. These are economic objectives, social objectives and an environmental objective. These are defined as follows:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and,

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.13 The proposed scheme promotes the relevant policies contained in paragraphs 8 and 11 of the NPPF.
- 5.14 Paragraph 117 states that the use of previously-developed or brownfield land should be maximised, and paragraph 118 states that planning decisions should ‘*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*’.
- 5.15 Paragraph 118 also supports the development of under-utilised and which can be used more effectively, and paragraph 122 states that decisions should support development that makes efficient use of land. The proposed scheme is a brownfield development that optimises a potential sui generis residential and hotel use making a more effective use of the land than currently exists in its inefficient retail form.
- 5.16 Exeter is experiencing a shortage of land for meeting identified housing. Where this is the case, the NPPF paragraph 123 states that ‘*it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site*’. The development proposal has made optimal use of its site that will free existing capacity of the current housing stock within Exeter and therefore providing a positive contribution to the supply of housing.
- 5.17 Planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner as per paragraph 178 of the NPPF. The development proposal will, despite its historic use prior to the retail use it has had for the last 35 years, will be provided on a safe site as any contamination will be effectively mitigated by the developer.

Design

- 5.18 Paragraph 124 highlights the importance of design by stating that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve as good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. The applicant has undertaken a collaborative process with the relevant stakeholders to ensure that the design is of sufficient quality, providing an improvement on what is currently located on the site.
- 5.19 Paragraph 127 states that developments should deliver the following:
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and,*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

- 5.20 Engagement is critical to good design as outlined by paragraph 128 which states that applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community, and early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important. The applicant has undertaken detailed consultation so as to engage and take account of relevant views, as documented in the Statement of Community Involvement submitted with this application.
- 5.21 In determining applications, great weight should be given to innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings as per paragraph 131. The applicant has sought to achieve a sustainable development, for example by reducing and discouraging reliance on car travel and ensuring that the scheme will be BREEAM rated as “excellent”.

Transport

- 5.22 Paragraph 102 relates to sustainable transport and states that opportunities to promote walking, cycling and public transport use are identified and pursued, and patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. The applicant has sought to do that with the design of the scheme.
- 5.23 Development should be focussed in locations already or are able to be served by a choice of transport modes and are served by a range of services thus limiting the need and frequency to travel. This can not only help to reduce congestion and emissions but can also have a positive impact by and improving air quality and public health and well-being as per paragraph 103 of the NPPF. The site of the proposed scheme is ideally located for different types of public transport.
- 5.24 When assessing applications, paragraph 10 of the NPPF states that the following points should be considered:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and,*

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Town Centres

- 5.25 Paragraph 85 of the NPPF outlines how planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Council's should seek to promote their long-term vitality and viability *'by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters' and 'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites'.*
- 5.26 Within the Glossary, the NPPF defines main town centre uses as the following *'Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)'.*

Residential Development

- 5.27 Paragraph 59 outlines the Government's objective to significantly boost the supply of homes and emphasises the importance of delivering the amount and variety required, whilst ensuring that the needs of groups with specific housing requirements are addressed. Paragraph 61 echoes this, stating that within this context the size, type and tenure of housing needed for different groups should be considered. The proposed scheme is clearly increasing the supply of housing by freeing up existing capacity and providing flexible housing options that meet the needs of a group of people struggling to access the housing market.
- 5.28 Paragraph 91 outlines the role planning policies and decisions have in creating healthy, inclusive and safe places. These places should promote social interaction *'for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages'*, are safe and accessible *'for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas' and enable and support healthy lifestyles.*
- 5.29 The NPPF states at paragraph 92(a) that the necessary social, cultural and recreational facilities to serve the community are in place, and the policies and decision should *'plan positively for the provision and use of shared spaces, community facilities ... and other local services to enhance the sustainability of communities and residential environments'.*

Heritage

- 5.30 Paragraph 184 of the NPPF states that heritage assets are *'an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.* The City Wall is located adjacent to

the site and is a scheduled monument, which the scheme does not impact on directly but does seek to enhance its setting through high quality design.

- 5.31 The NPPF provides guidance as to how proposals affecting heritage assets are to be assessed. Paragraph 189 states that in determining applications, *‘local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’*. The site is located within a Conservation Area and adjacent to a Scheduled Monument (The City Wall) as such a Heritage Statement has been prepared which has described all assets known within and adjacent to the site and assessed the impact of development on those assets.
- 5.32 Paragraph 192 states that LPA’s should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and,*
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.*
- 5.33 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, as per paragraph 195. This test is a central element of the Heritage Impact Assessment included with this application and confirms that the impact will be less than substantial.
- 5.34 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use as per paragraph 196. This a key test in assessing this scheme and one which is addressed further in the Heritage Impact Assessment and at section 6, below.
- 5.35 Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably and the Design and Access Statement illustrates how the setting of the Scheduled Monument (The City Wall) will be preserved and access to it, enhanced through the proposals.

Local Planning Policy

- 5.36 The site is within the administrative boundary of Exeter City Council. The Local Plan within Exeter comprises two documents:
- Local Plan (LP) First Review 1995-2011 (Adopted 31 March 2005);
 - Core Strategy Development Plan Document (Adopted 21 February 2012).

- 5.37 The Council has embarked on the preparation of the Development Delivery DPD and though this has not yet been adopted and does not formally form part of the Local Plan, it has progressed to a significant point that the Council consider that it carries some limited weight in the decision-making process. As such, it is a material consideration and will be taken into account when determining a planning application.

Retail

- 5.38 The site is located within the Primary Shopping Area where Local Plan Policy S3 states that the change of use of ground floor retail (Use Class A) premises '*will not be permitted in the primary ... shopping areas of the city centre and in the district and local centres if it would harm the vitality and viability of the centre*'. It can be seen that this policy does not prevent the proposed scheme from being approved as vitality and viability of the city centre will be increased as a result of the outdated, debilitated retail use being replaced by more effective and viable uses. Maintaining the retail use will, if retained, more likely harm the vitality and viability of the centre.
- 5.39 The supporting text at paragraph 5.32 states that proposals will be assessed to determine whether they are likely to cause harm to the vitality and viability of existing centres, and the circumstances in which harm may be caused are:
- (a) the change of use of groundfloor Class A uses (shops, financial and professional services and food and drink) to other uses outside Class A;*
 - (b) the change of use of ground floor shops (Class A1) to food and drink (Class A3) if, following implementation of the proposal and existing permissions, less than 50% of the separate ground floor Class A premises within the same shopping frontage will be in Class A1 shopping use;*
 - (c) the change of use of groundfloor shops (Class A1) to financial and professional services (Class A2) if, following the implementation of the proposal and existing permissions;*
 - (i) less than 80% of the separate ground floor Class A premises within the same shopping frontage will be in Class A1 shopping use in the primary shopping area;*
 - (ii) less than 50% of the separate ground floor Class A1 premises within the same shopping frontage will be in Class A1 shopping use in the secondary shopping areas, district centres and local centres.*

Hotel

- 5.40 Paragraph 6.9 of the LP states that 'tourists staying in the City Centre are more likely to use local services and facilities, maximising the benefits of increased tourist spending to the economy' whilst city centres are also accessible by public transport, thus reducing the traffic generated by such developments.
- 5.41 LP Policy TM1 is the only policy within the development plan which specifically refers to hotel accommodation and outlines that hotel development will be permitted in the city centre. It specifically relates to development on land allocated for offices or through the conversion of an office building, and at the quayside. However, the principle is accepted, that hotels may be provided within the city centre.

Residential

- 5.42 CS Policy CP1 states that over the plan period 2006-2026 provision is made within the city for at least 12,000 dwellings. Local planning authorities should ‘*identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies*’ as per paragraph 73 of the NPPF. The Council are unable to demonstrate the required 5-year housing land supply, and a recent appeal case at Land to the west of Clyst Road, Topsham, Exeter, Devon (Ref: APP/Y1110/W/18/3202635 ref. 17/1148/OUT) stated (para 40) that ‘*it is common ground that the Council cannot demonstrate a five-year supply of deliverable housing sites.... In line with footnote 7 of the Framework, this would normally engage the balance set out in the Framework’s paragraph 11(d) in respect of the presumption in favour of sustainable development*’.
- 5.43 As such, in absence of a five-year housing land supply, the Council’s housing policies may be considered to be out of date and when determining applications for residential development such as the proposed scheme. Accordingly, the Council should revert back to national policy and determine the application based on its merits as per the sustainable development criteria. However, some of the housing policies within the Development Plan do reflect the wider principles of delivery of housing which may be considered applicable.
- 5.44 LP Policy H1 states that proposals for housing development on previously developed land such as the Harlequins Centre, conversions and infill within the urban areas will be given the highest priority and this is in line with the NPPF.
- 5.45 LP Policy H2 states that development should be permitted at the highest density that can be achieved ‘*without detriment to local amenity, the character and quality of the local environment and the safety of local roads, whilst having regard to the need to provide a variety of housing provision which is accessible to a range of employment, shopping, education, health and social care, leisure and community facilities*’. The Design & Access Statement demonstrates how the scheme avoids significant impacts on neighbouring properties whilst providing development within the central, sustainable, location.
- 5.46 CS Policy CP4 echoes this stating that ‘*residential development should achieve the highest appropriate density compatible with the protection of heritage assets, local amenities, the character and quality of the local environment and the safety and convenience of the local and trunk road network.*’ And this remains consistent with the NPPF.
- 5.47 LP Policy DG4 relates to the design of residential development and states that proposals should:
- (a) be at the maximum feasible density taking into account site constraints and impact on the local area...;*
- 5.48 The design of the proposed scheme has in our view achieved that policy aim.
- 5.49 As per LP Policy DG6, in providing for vehicle circulation and car parking in new residential development the design of the scheme should:
- (a) ensure that parking provision is arranged so that urban form may be created without vehicles dominating the street scene;*

- (b) provide permeable highway systems linked to adjoining roads;*
- (c) ensure that the means of calming traffic do not detract from the character of the townscape;*
- (d) provide safe and secure parking that is subject to clear surveillance by local residents’.*

Sustainability

- 5.50 CS Policy CP13 relates to Decentralised Energy Networks and states that they ‘*will be developed and brought forward*’. However, there are no such systems within the centre of the city and therefore it is not possible to comply with this policy at this time.
- 5.51 CS Policy CP14 states ‘*new development (either new build or conversion) with a floorspace of at least 1,000 sq. metres, or comprising ten or more dwellings, will be required to use decentralised and renewable or low carbon energy sources, to cut predicted CO2 emissions by the equivalent of at least 10% over and above those required to meet the building regulations current at the time of building regulations approval, unless it can be demonstrated that it would not be viable or feasible to do so*’. The Council have confirmed that they no longer apply Policy CP14 as it has become outdated. Instead, on residential schemes they seek a 19% reduction on 2013 Building Regulations (or 44% over 2006 Regs) and on non-residential they will seek a scheme which achieves BREEAM Excellent (as set out in Policy CP15). The proposed development scheme will achieve an “Excellent” BREEAM rating.
- 5.52 CS CP15 states that proposals for development are expected to demonstrate how sustainable design and construction methods will be incorporated. All development must be resilient to climate change and optimise energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials, and by using technologies that reduce carbon emissions. All non-domestic development will be required to achieve BREEAM ‘Excellent’ standards from 2013, and non-domestic buildings are expected to be zero carbon from 2019. These requirements are addressed in the design approach, as documented in the Design & Access Statement and the Energy Statement submitted with the application.
- 5.53 CS Policy EN2 states that where development is proposed on or near a site where there is contamination (or good reason to believe that contamination may exist) the developer should carry out a site assessment to establish the nature and extent of the contamination. Development will not be permitted unless, in relation to the specific use for which permission is being sought, practicable and effective measures are to be taken to prevent unacceptable risks to human health or the environment. Remediation measures must ensure that the proposal will not:
- (a) expose the occupiers of the development and neighbouring land uses to unacceptable risk;*
 - (b) threaten the structural integrity of any building built, or to be built, on or adjoining the site;*
 - (c) lead to the contamination of any watercourse, water body or aquifer;*
 - (d) cause the contamination of adjoining land or allow such contamination to continue.*
- Contamination should be treated on site if possible. Any permission for development will require that the remedial measures agreed with the authority must be completed before the development is occupied’.*
- 5.54 The Preliminary Geo-environmental and Geo-Technical Assessment submitted with this application considers the opportunities for ground contamination and it is anticipated that further investigations

and remediation will be required as part of developing the site, controlled through appropriate conditions imposed on a permission (if it were granted).

Design

- 5.55 The LP seeks to promote good design in all development proposals and LP Policy DG1 states that development should:
- (a) be compatible with the urban structure of the city, connecting effectively with existing routes and spaces and putting people before traffic;*
 - (b) ensure that the pattern of street blocks, plots and their buildings (the grain of development) promotes the urban character of Exeter;*
 - (c) fully integrate landscape design into the proposal and ensure that schemes are integrated into the existing landscape of the city including its three-dimensional shape, natural features and ecology;*
 - (d) be at a density which promotes Exeter's urban character, and which supports urban services;*
 - (e) contribute to the provision of a compatible mix of uses which work together to create vital and viable places;*
 - (f) be of a height which is appropriate to the surrounding townscape and ensure that the height of constituent part of buildings relate well to adjoining buildings, spaces and to human scale;*
 - (g) ensure that the volume and shape (the massing) of structures relates well to the character and appearance of the adjoining buildings and the surrounding townscape;*
 - (h) ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape;*
 - (i) use materials which relate well to the palette of materials in the locality and which reinforce local distinctiveness'.*
- 5.56 *This is addressed throughout the Design & Access Statement submitted with this application and the associated Landscape and Visual Assessment.*
- 5.57 The layout of new development and the design of buildings should contribute to the conservation of energy and LP Policy DG2 states that new development *'should be laid out and designed to maximise the conservation of energy. proposals should:*
- (a) retain and refurbish existing buildings on site except where retention is unviable or the buildings are detrimental to the character of the site or would prejudice the best use of land;*
 - (b) aim to gain maximum benefit from solar gain;*
 - (c) be subject to landscape schemes which provide landform and planting that acts as a shelter for buildings'.*
- 5.58 CS Policy CP11 states that development should be located and designed so as to minimise and if necessary, mitigate against environmental impacts. Within the Air Quality Management Area measures

to reduce pollution and meet air quality objectives, that are proposed by the Local Transport Plan and the Air Quality Action Plan, will be brought forward.

- 5.59 CS Policy CP15 also states that *‘all development must be resilient to climate change (particularly summer overheating) and optimise energy and water efficiency through appropriate design, insulation, layout, orientation, landscaping and materials, and by using technologies that reduce carbon emissions’*.
- 5.60 CS Policy CS17 echoes this, stating that proposals *‘will exhibit a high standard of sustainable design that is resilient to climate change and complements or enhances Exeter’s character, local identity and cultural diversity’*. The policy then provides more detail. And states that *‘Development in the City Centre...will:*
- *enhance the city’s unique historic townscape quality;*
 - *protect the integrity of the city wall and contribute positively to the historic character of the Central and Southernhay and Friars Conservation Areas;*
 - *create places that encourage social interaction, utilising public art as an intrinsic component of a high quality public realm;*
 - *enhance and expand the city’s retail function to improve Exeter’s draw as a regional shopping centre;*
 - *include residential development in a mix of uses that encourage vitality and establish a safe and secure environment;*
 - *create a City Centre that is vital and viable and presents a positive experience to the visitor;*
 - *enhance the biodiversity of the City Centre and improve the links to the green infrastructure network;*
 - *contribute to the establishment of a decentralised energy network’*.
- 5.61 LP Policy DG7 outlines that the design of all development should seek to provide a safe and secure environment for users. In order to achieve this, *‘proposals should:*
- (a) ensure pedestrian routes and public spaces are overlooked and subject to natural surveillance;*
 - (b) provide enclosure of properties, so that private spaces are well defined and fulfil the role of defensible space;*
 - (c) ensure that lighting is located and designed in such a way as to deter and reduce the fear of crime;*
 - (d) ensure that schemes for landscape design, including new planting, do not create opportunities for crime and that, where appropriate, species of plants are used to deter criminal or anti- social behaviour;*
 - (e) integrate crime prevention measures in an unobtrusive manner, such that the fear of crime is not raised, and that there is no detrimental effect upon townscape and amenity.*
- 5.62 In relation to design, emerging DPD policy DD25 outlines design principles and states that permission will be granted for development that addresses, where relevant, the following factors:

- a) creates high quality distinctive places;*
- b) ensures the location, layout and built form complement the surroundings;*
- c) includes a robust and long-lasting landscape framework which takes advantage of existing landscape features;*
- d) contributes to the provision of a compatible mix of uses which work well together to create vital and viable places;*
- e) retains and refurbishes existing buildings of good townscape value;*
- f) integrates measures to address climate change in ways which contribute to the character and appearance of the scheme;*
- g) contributes to the delivery of the Exeter Green Infrastructure Strategy;*
- h) creates or maintains a high-quality public realm and makes provision, where appropriate, for public art as an integral part of the design;*
- i) ensures that the scale, massing and height of buildings, extensions, and other structures relate well to the site, the surroundings and to human scale;*
- j) adopts contemporary and innovative design solutions where appropriate;*
- k) is visually attractive as a result of good architectural detailing and landscaping;*
- l) uses high quality materials which relate well to materials in the locality;*
- m) retains and protects existing trees of good arboricultural and amenity value and supports the planting of native trees in appropriate locations; and,*
- n) integrates all service, utility, extraction systems and refuse facilities so that they complement the scheme’.*

- 5.63 All of these various aspects of design approach have been carefully considered and addressed through the design approach, with the building scale, use and appearance changing through the process to reflect comments received and to meet the stated policy objectives.

Transport

- 5.64 LP Policy T1 states that development should facilitate the most sustainable and environmentally acceptable modes of transport, having regard to the following hierarchy:
1. Pedestrians
 2. People with mobility problems
 3. Cyclists
 4. Public transport user
 5. Servicing traffic

6. Taxi users
7. Coach borne visitors
8. Powered two wheelers
9. Car borne shoppers
10. Car borne commercial/ business users
11. Car borne visitors
12. Car borne commuters.

5.65 LP Policy T2 states that in accordance with the accessibility criteria set out in schedule 1, *‘residential development should be located within walking distance of a food shop and a primary school and should be accessible by bus or rail to employment, convenience and comparison shopping, secondary and tertiary education, primary and secondary health care, social care and other essential facilities. Nonresidential development should be accessible within walking distance and/or by bus or rail to a majority of its potential users’.*

5.66 LP Policy T3 seeks development laid out and linked to existing or proposed developments and facilities in ways that will maximise the use of sustainable modes of transport. The Policy states that proposals should ensure that:

- (a) all existing and proposed walking and cycle routes are safeguarded or that alternative reasonably convenient routes are provided;*
- (b) suitable cycle parking provision is provided in accordance with the standards set out in schedule 2;*
- (c) where more than 20 people are employed facilities for showering and changing are provided;*
- (d) full account is taken of the needs of bus operation through and alongside new development by the provision of lay-bys, roads and other associated facilities;*
- (e) where appropriate, pedestrian and cycling links are provided to existing or proposed rail stations;*
- (f) the particular needs of people with disabilities are taken into account’.*

5.67 Emerging DPD Policy DD20 seeks to exploit opportunities for the use of sustainable transport modes and aims to ensure that throughout all stages of the development process attention is given to minimising the need to travel and reducing the dependence on the car. The Policy states that *‘development, as appropriate to its location, scale and form, should:*

- A) give priority to the needs of pedestrians, cyclists and users of public transport over private motorised vehicles;*
- B) avoid prejudicing the delivery of, and where appropriate contribute to development or improvement of, the primary cycle routes and key local cycle/pedestrian links;*
- C) provide safe, sufficient and convenient means of access to existing and proposed transport networks, without conflicting with the existing function or safety of those networks;*

D) be phased so that early development is as close as possible to existing public transport services, walking and cycle routes, then progress in such a way that bus, walking and cycle routes can be extended into the development as it becomes practical and viable to do so; and,

E) be supported by a travel plan and appropriate travel planning incentives that encourage the use of sustainable forms of movement.

- 5.68 LP Policy T10 states that development will not be permitted with more parking than the standards set out in schedule 3 except as part of a phased development, guided by a travel plan and incorporated into a legal agreement. The policy also states that car parking provision should be made for people with mobility problems in accordance with the standards set out in schedule 4, which will be applied throughout the city.
- 5.69 Emerging DPD Policy DD21 states that development should:
- (a) provide an amount of car parking appropriate to the proposal and its location, and make appropriate provision for the parking of motorcycles and for the charging of electric vehicles;*
 - (b) integrate parking provision into the overall design of the development and ensure an appropriate ratio of allocated to unallocated parking, so as to avoid the creation of a car dominated environment which is unsafe for pedestrians and cyclists;*
 - (c) provide safe and secure parking facilities that are subject to natural surveillance, with safe and convenient pedestrian links to their surroundings; and,*
 - (d) make safe, secure, sufficient and convenient provision for cycle parking and storage in all development and providing showers, lockers and drying space where possible, and in any event where more than 20 people are employed.*
- 5.70 The cycle standards for hotel development are set out as 1 staff space per 10 bedrooms and 1 visitor space per 10 bedrooms.
- 5.71 The cycle standards for residential development without a garage are 1 space per 1 – 2 bed dwelling, or 2 spaces for dwellings of 3 or more beds. Where there is a garage, the spaces are as above, however these can be accommodated within the garage and no separate additional provision is required.
- 5.72 The cycle standards for multi-occupation/bedsit/student development are set out at 1 space per unit for the first 10 and thereafter 1 space per two bedrooms.

Heritage Conservation

LP Policy TM5 states that development on sites adjacent to the City Wall will be permitted where the *proposals:*

- (a) preserve or enhance the setting of the city wall through high quality design;*
- (b) where feasible provide public access to the circuit of the city wall;*
- (c) provide relevant interpretation of the city wall, together with signing and lighting where appropriate’.*

- 5.73 The application proposals specifically address these criteria in detail, with proposals specifically avoiding any direct impacts on the scheduled monument itself. Access to the wall is enhanced through

the setting of buildings and landscape detailing, whilst a specific interpretation building is proposed to enhance the experience of visiting this important asset.

- 5.74 Paragraph 10.6 of the LP states that the Central and Riverside areas are pre-eminent, containing many important monuments, buildings and spaces and LP Policy C1 states that development within a conservation area *‘must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area’*.
- 5.75 There are many Listed Buildings within the vicinity of the site and LP Policy C2 states that development (including changes of use, alterations and extensions) which affects a listed building must have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. LP Policy C3 relates to buildings of local importance and states that development (including changes of use, alterations and extensions) which affects a building of local importance will not be permitted *‘where it harms the architectural or historic value of the building.’*
- 5.76 Exeter's historic core has been designated as an Area of Archaeological Importance covering much of the City Centre, including the subject site. LP Policy C5 states that development will not be permitted *‘which would cause harm to a site, monument or structure of national archaeological importance, whether scheduled or unscheduled, or which would cause harm to its setting. Proposals should preserve nationally important archaeological remains in situ and, where appropriate, make arrangements for their enhancement and display. Where the proposal will affect remains of regional or local importance, the desirability of preserving the remains in situ will be weighed against the need for the development. If preservation in situ is not feasible or appropriate the developer must undertake archaeological recording works in accordance with a scheme to be agreed in advance’*.
- 5.77 Emerging DPD Policy DD28 relates to heritage assets and states that development that affects the historic environment will be allowed provided it meets the following criteria,
- a) A development proposal that affects a designated heritage asset must conserve its particular significance, in the form of fabric, setting, character or appearance, and any features of special architectural or historic or archaeological interest that it possesses; and,*
- b) For development that affects non-designated heritage assets, including buried remains and those on the List of Locally Important Heritage Assets, the presumption will be that the particularly significant elements of these assets, including physical form and setting, will be conserved and enhanced.*

Contributions

- 5.78 CS Policy CP18 outlines how developer contributions will be sought to ensure that the necessary physical, social, economic and green infrastructure is in place to deliver development. Contributions will be used to mitigate the adverse impacts of development (including any cumulative impact). Where appropriate, contributions will be used to facilitate the infrastructure needed to support sustainable development.

Community Infrastructure Levy

- 5.79 Exeter City Council introduced their CIL on 1 December 2013. This relates to new development which creates additional floorspace and is charged on development at a rate per square metre which is index linked from the original (2103) rate, as per the table below:

Use	Levy 2103 (per sq m)	For schemes approved 2019
Residential (excluding Use Class C2)	£80	£113.57
Student housing whose occupation is limited by planning permission or planning obligation	£40	£56.79
Retail (includes Use Classes A1–A5) outside city centre	£125	£177.46
All other development	Zero	£0

6 Planning Analysis

This section considers the proposals for the redevelopment of the Harlequins Centre, as set out in Section 3, in the light of the Development Plan policies and material considerations, as set out in Section 5, providing an analysis of how the proposals align with the policies of the Council, where relevant.

Loss of Retail Use

- 6.1 LP Policy S3 states that the change of use of ground floor retail (Use Class A) premises '*will not be permitted in the primary ... shopping areas of the city centre ... if it would harm the vitality and viability of the centre*'.
- 6.2 The Harlequins Centre has struggled to maintain commercial viability for several years. The Retail Report which accompanies this application (Appendix B) reconfirms that The Harlequins Centre has not been able to attract good quality occupiers and has increasingly had vacant units over a significant period of time. Whilst it is noted that recently this is in part due to the prospect of redevelopment, it is important to note that the GOAD plan contained in the EWEED Retail Study dated 2015 shows 7 out of the 24 units in the Harlequins Centre were vacant. This equated to a 29% vacancy rate (the national average for a city centre is 11.5%). This reconfirms that the Harlequins Centre at that point in time was not fulfilling its role as a Primary Shopping Area and the Council acknowledged at that time that the future of the centre would be away from A1 retail uses.
- 6.3 LP Policy S3 states that the change of use from retail will not be permitted if it would harm the viability of the area, however, as set out in the Retail Study included as Appendix B, the Harlequins Centre represents only 3.3% of the city centres retail commercial floorspace, and given the tenant mix, represents a much small proportion of the overall turnover, at under 0.4%. The loss of this floorspace will therefore not have any material impact on the health and function of the city centre and its redevelopment for an alternative (flexible residential and hotel) use would increase footfall in the locality, thus strengthening the other retail units and adding to the overall vitality and vibrancy of the centre.
- 6.4 Overall, this proposal should therefore be seen as a positive investment into the city centre, driving footfall and leisure uses. The loss of the retail floorspace will have no significant impact on the health of the city centre but rather help bring the focus for retailer demand into the core retail area.

Principle of Alternative Use: Hotel

- 6.5 Hotel use is an identified city centre use as per the Glossary in the NPPF and LP Policy TM1 outlines that hotel development will be permitted in the city centre and this is reiterated in Emerging DPD policy DD17.
- 6.6 A market snapshot report (Included as Appendix C) has been produced for Exeter and shows the period since 2016 the occupancy rate of the existing hotels in Exeter has continued to grow, moving up on average from 81% in 2016, to 83% in 2018. The peak months July to September regularly being above 90%. At the same time Revenue per available room (RevPAR) has experienced an upward trend as 2017 saw RevPAR grow by 3.9% on the previous year. This demonstrates a continuing buoyant hotel market in the city and the location of this site, positioned between Exeter Central station and the city centre, means it is perfectly situated to be attractive as a hotel.

- 6.7 All of Exeter's major attractions are easily reachable from this destination directly or indirectly and the provision of a hotel will support the local economy, attracting additional tourists, business people, and those looking to visit friends and relatives in the city.
- 6.8 As such, it is considered that, in principle, a hotel use in this city centre location would be in conformity with local and national planning policy.

Principle of Alternative Uses: Co-Living

- 6.9 Co-Living is a new and emerging form of high-density accommodation, which has characteristics similar to other uses, including Build To Rent accommodation. However, it has specific characteristics which means that it is not an identified use class within relevant legislation (e.g. Town and Country (Use Classes) Order) 1987 (as amended) or in planning policy such as the National Planning Policy Framework (NPPF) (2019). As such, the use does not fall within the normal categorisation of residential uses; C2 Residential Institutions, C3 Dwelling houses or C4 Houses in Multiple Occupation. As such the use is therefore considered to be a "Sui Generis" use.
- 6.10 Understandably the Development Plan does not make reference to this innovative form of housing. There are no allocations for this use, nor are suitable locations specified in policy. However, as a high-density residential use, it is proposed that it should be accepted in principle within a city centre location.
- 6.11 Paragraph 85 of the NPPF states that Council's should seek to promote the long-term vitality and viability of town centres *'by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters'*. The retail offering within the Harlequins Centre has changed and residential development in this location would increase footfall and contribute to the vitality of the centre.
- 6.12 The approval of this scheme would also help to alleviate the pressure currently placed on family homes which have been lost through conversion to HMOs, as it will deliver purpose-built accommodation designed to meet the needs of that part of the population that traditionally occupy HMOs. It will therefore free up these homes to allow families to live there, rebalancing the mix of communities in the area.

Housing Delivery Test

- 6.13 The Co-Living element of the scheme will provide residential accommodation but not within a standard residential C3 Use Class. In these circumstances, it is acknowledged that the contribution towards housing delivery will not be 1:1 and this will be reflected in the Governments calculation of housing delivery.
- 6.14 The Housing Delivery Test Measurement Rule Book (July 2018) sets out the method for calculating the number of net homes delivered against the number of homes required within a local authority area. The rule book states that the ratio applied for 'other communal accommodation' is based on the national average number of adults in all households in such accommodation. At present this equates to a ratio of 1.8. The Harlequins Centre scheme comprises 298 rooms in total, therefore when the ratio of 1.8 is applied, the scheme will contribute 165 additional dwellings to the Council's housing delivery figures, to meet the requirement of delivering at least 12,000 dwellings over the plan period, as per CS Policy CP1.

Community balance

- 6.15 A key consideration arising from consultation in regard of this scheme has been the potential impact of additional student accommodation and the terms of Adopted Local Plan Policy H5. That policy seeks to limit developments such as student accommodation, particularly where it would result in an *“overconcentration of the use in any one area of the city which would change the character of the neighbourhood or create an imbalance in the local community”*.
- 6.16 The provision of student accommodation in the city centre and notably in the St David’s Ward has been evident for some time and resulted in the Article 4 Direction which limits change of use to HMOs around the Harlequins Centre site.
- 6.17 The implication of additional student accommodation has been a significant point of debate during the preparation of this scheme and was a key element in the consideration of application 19/0560/FUL for the site at Beech Hill House, Walnut Gardens, Exeter. This application was refused at Planning Committee on 2 September 2019 and one of the reasons for refusal was that *‘the proposal would result in the overconcentration of student accommodation on the site to the detriment of nearby existing residents amenities to the extent that it would change the character of the area and exacerbate existing problems of imbalance in the local community’*.
- 6.18 The Harlequins Centre project team has been very aware of the issues around Policy H5 and notably community imbalance and this was a key element in the decision to adopt a more open, Co-Living, use for the Harlequins Centre site
- 6.19 The characteristics of the scheme, as set out in the Management Plan and Design & Access Statement prepared for this application, are targeted to attract a younger demographic, who are looking for flexible residential accommodation as they embark on the world of work. However, it will be open to everyone who is looking for high quality, well managed, centrally located, accommodation and this reflects the NPPF instruction to provide housing to meet the needs of groups with specific requirements (Para59).
- 6.20 As such, the delivery of the Harlequins Centre development as proposed will provide an alternative form of housing, for a range of individuals which will not exacerbate current perceptions of an imbalance in the local community of St David’s and will provide some rebalancing by attracting a wider demographic.

Community Infrastructure Levy (CIL)

- 6.21 The Council adopted its CIL in 2013 and this applies to all developments which deliver more than 100sqm of new accommodation. The levy is applied at different rates depending on the use and is index linked.
- 6.22 Both the Hotel and the Co-Living element of the scheme fall within the ‘All other development’ category of the charging schedule where the CIL liability is zero.

Scale

- 6.23 Adopted Local Plan Policy DG1(f) states development must be of a height which is appropriate to the surrounding townscape and ensure that the height of constituent part of buildings relate well to adjoining buildings, spaces and to human scale and (g) ensure that the volume and shape (the massing)

of structures relates well to the character and appearance of the adjoining buildings and the surrounding townscape.

- 6.24 The design and scale of development has been one of the key considerations of the development due to the site's location within the city centre, proximity to designated heritage assets (which is addressed further in the next section) and the amenity of the nearby residential occupiers (discussed further below). This has resulted in pre-application consultation and discussions with local residents, councillors, Historic England and the Design Review Panel to ensure an acceptable scheme.
- 6.25 The scale of the buildings has been considered at each stage of the design process and this is documented in Section 3 of the Design and Access Statement. Over the course of the design development, the height of buildings has significantly been reduced, reflecting consultation responses.
- 6.26 The impact of the development has been fully tested through a Landscape and Visual Impact Assessment (LVIA) which has been a key element of the design process and the final assessment is submitted with this application and concludes that *'although a significant development the proposed development will have a small and localised impact on the overall character of the city centre, largely restricted to the immediate townscape and streets'*.
- 6.27 The scheme will improve views along Paul Street and opening the *'canyon like character of Paul Street which is identified as a negative space in the Central Conservation Area Appraisal'* and creating natural surveillance. The LVIA describes the scheme as a *'high quality mixed use development with active frontages, human scale and public spaces that enhance the setting of these spaces'- improving the quality of the townscape in these areas'*.
- 6.28 The LVIA confirms that there will be no significant impacts on key views in and out of the site as a result of the development following scheme evolution and changes to lessen the scheme's impact on the surrounding context, and the scheme is assessed as having a moderate to major beneficial effect on the character of the Harlequins Centre Site therefore meeting the terms of Adopted Policy DG1.

Solar Shading

- 6.29 A key concern of local residents during the consultation stage of this development has been the impact of proposed buildings on light received into neighbouring dwellings. A Solar study has therefore been undertaken in parallel with the design process to assess the impact of the scheme upon the surrounding area.
- 6.30 The scheme has been orientated to the north-west and south-east in a way which minimises overshadowing both with and upon the properties adjoining the site. The study found that overshadowing in the spring and summer months is mainly over the existing vehicle ramp with the central courtyard and rear of the site receiving good levels of daylight through-out the day, and the orientation towards Paul Street to the east has further reduced overshadowing to the neighbouring properties along the City Wall
- 6.31 During winter months, the level of shading remains similar to that experienced to date due to the scale of the existing Harlequins Centre and the adjacent Guildhall and this is illustrated on the Solar shading presented in Section 3 of the Design and Access Statement.

- 6.32 Emerging policy DD13 relates to amenity and states that development will be permitted provided that it does not result in unacceptable harm to the amenity of neighbouring residents and, where new residential development is proposed, provides good living conditions and standards of amenity. The solar study demonstrates that the scheme is in accordance with this Policy along with LP Policies DG4 and H2, and CS Strategy CP4 as the scheme has sought to reduce negative impacts upon neighbours and the surrounding area.

High Quality Design

- 6.33 National and local planning policy seeks high quality design in new development that responds to the surrounding built environment and contributes to the character of the area.
- 6.34 The Adopted Local Plan seeks to promote good design in all development proposals and Policy DG1 states that development should contribute to the provision of a compatible mix of uses which work together to create vital and viable places and ensure that all designs promote local distinctiveness and contribute positively to the visual richness and amenity of the townscape. This is then brought forward through emerging DPD policy DD25.
- 6.35 The site is located within Exeter's city centre where there is a rich diversity of architectural styles which define the character of the area in and around the Harlequins Centre. As such, the elevations have been developed to present a contemporary building which establishes a bold approach, and the result is a high-quality architectural approach which enhances Paul Street and the setting of the city wall and creates a consistent well-balanced built form.
- 6.36 The proposed materials palette for the development takes its cues from local buildings with glass, brick and stone seen as an appropriate response for a building of this scale and character and the landscape approach provides a quality setting for the buildings with enhancements to the public realm, particularly along Paul Street, which will enhance the quality of the city centre. As such is it considered that the building represents a high-quality approach to the site and its surroundings, in line with national and local planning policy and enhances the site in terms of quality design when comparing it to the buildings currently on the site.

Historic Environment

- 6.37 The application site lies within the historic centre of the city and consideration of the heritage impacts of the proposals have been at the forefront of the design process. At the outset of the project a Baseline Historic Environment Desk-Based Assessment (HEDBA) was prepared which set out the character of the site and the heritage assets within and near to the site. Given the importance of buried archaeology a preliminary Archaeological Impact Assessment was included in the initial Baseline Report and subsequently discussed with officers of the Council and Historic England.
- 6.38 In understanding the site and the previous works a detailed analysis of the archive of previous site investigations was undertaken and two new archaeological trenches investigated in order to supplement the existing information. In regard of the above ground heritage assets, the Harlequins Centre is located within Exeter's Central Conservation Area and borders Exeter St David's Conservation area. The City Wall, a scheduled monument, lies immediately to the west of the site and there are a number of listed buildings and structures around, but not within, the site. Northernhay Gardens (a

registered Park and Garden) lies to the north of the site and there are views of heritage assets such as the Cathedral Church of St Peter and St Michaels at Mount Dinham from the site and surroundings.

- 6.39 Adopted Local Plan Policy C1 states that development within a conservation area ‘*must pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area*’ and Policy C2 states that development which affects a listed building must have special regard to the desirability of preserving the building or its setting.
- 6.40 The extent to which the proposals *preserve . . . the character of the conservation areas* can be judged by balancing the benefits and dis-benefits of effects as set out in the Heritage Impact Assessment. The proposal has taken great care to minimise adverse impacts to the greatest extent possible and has thus complied with the *desirability* of preservation. The extent to which the proposals *enhance . . . the character of the conservation area* is a judgement that is outside of a purely heritage impact assessment and depends largely upon the quality of architectural design. The proposed scheme has made use of both the locally dominate palette of materials and incorporated design elements to the facades to minimise apparent height and mass, working around the imposing bulk of the car-park ramp to create a street scene that is visually interesting and arresting and provides much greater access to and appreciation of the surviving element of the historic environment within the site – The City Wall.
- 6.41 The, more recent, NPPF states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, as per paragraph 195.
- 6.42 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use as per paragraph 196.
- 6.43 In order to consider these tests, the final scheme has been subject of a HEDBA Impact Assessment which has been prepared to consider the likely and significant effects of development on historic assets and the methodology is based on an approach recently utilised in the assessment of a new bridge at Tintagel Castle on behalf of English Heritage and agreed with Historic England.
- 6.44 The Impact Assessment considers the significance of each asset and assesses the magnitude of impact of the development on that asset, before and after mitigation. This is acknowledged to be a process which is based on professional judgement of the impacts and the assessment for the NPPF is not the same as that which may be used in EIA assessments, as the terminology is different. However, the key is the impact on the heritage significance of the asset.
- 6.45 Paragraphs 132 and 133 of the NPPF make it very clear that substantial harm amounts to the total or near complete loss of significance of a designated heritage asset. The NPPF use of ‘substantial harm’ sets a high threshold for significance of effect.
- 6.46 The Impact Assessment considers buried archaeology and built heritage assets separately, reflecting the different characteristics of the two.
- 6.47 The NPPF states that impacts to significant buried archaeology should wherever possible be avoided and impacts to nationally important remains ‘should be wholly exceptional’ (NPPF para 194). Where impacts cannot be avoided, then appropriate mitigation by investigation would be appropriate

- 6.48 Thorough research into the history of the site, and notably the construction process used for the Harlequins Centre indicates that it involved a very significant reduction in ground level for mass concrete foundations. Consequently, the likelihood of archaeological deposits surviving under the majority of the existing building footprint is considered to be very low.
- 6.49 As a result, the footprint of the proposed building has been largely contained within the existing footprint of the building except for two small areas (shown in Figure 9 of the Heritage Impact Assessment). These areas are only affected by a small number of piles and bases supporting columns and therefore are judged to represent a quite small magnitude of impact. In addition, investigations indicate that remains in these areas are likely to be poorly preserved due to modern disturbance.
- 6.50 All new works have also been kept to a minimum of 500mm from the line of the City Wall and its supporting structures which, it is judged, will minimise likelihood of significant direct impacts on the scheduled monument and means that Scheduled Monument Consent is not required.
- 6.51 The effect of development on the significance of the setting of heritage assets is a material consideration in determining a planning application and the Impact Assessment describes the setting for each significant heritage asset and provide a measure of the contribution that the setting plays in the value of the asset. It seeks to consider the degree to which the setting contributes to the significance of the asset and the effect of the proposed development on that significance or the ability to appreciate it.
- 6.52 This process has been undertaken through the design process, so that the final design has been influenced by this assessment and this is documented in the Design & Access Statement (Section 3). In support of this process viewpoints were agreed with officers of the Council, Historic England and local residents and are incorporated within the Landscape and Visual Assessment (LVIA) which is submitted with this application.
- 6.53 The assessment of impact and significance of effects is presented in the Impacts Assessment and provides a clear assessment of the likely impacts of development on each of the heritage assets. These impacts range from Moderate Adverse to Neutral. None of the impacts are considered to be Substantial Adverse according to the conclusion of the Heritage Impact Assessment which accompanies this application.
- 6.54 The output is a table which provides a magnitude of impact, ranging from Substantial to Neutral. This is then, in turn, used to consider the significance of any impact, in the terms set in the NPPF and it is concluded in the assessment that the impact of the proposal will lead to less than “substantial harm” to the significance of any heritage asset. Therefore, it is for the decision maker, Exeter City Council, to weigh this harm against the public benefits of the proposal including, where appropriate, securing its optimum viable use as per paragraph 196 of the NPPF.

Ground contamination

- 6.55 The site lies within the city centre and has been known to be developed for nearly two thousand years. As such there have been a number of previous uses on the site including as a bell foundry and more recently as a bus and coach station. As such there is the potential for contamination to be present and Policy EN2 states that where development is proposed on or near a site where there is contamination, the developer should carry out a site assessment to establish the nature and extent of the contamination.

- 6.56 As the site is developed and remains in operation, the opportunity for significant on-site investigations have been limited. However, a Preliminary Geo-environmental and Geotechnical Assessment has been undertaken and has broadly found limited areas of contamination. However, evidence of some petroleum hydrocarbon contamination has been identified, it is thought from the previous use as a bus station.
- 6.57 The contamination is limited in its extent, but further investigations can be undertaken during the site clearance phase of any development. Given the proposed future site uses, it is assumed that a full remediation will be undertaken to secure a safe development in accordance with para 179 of NPPF and Core Strategy Policy EN2 and it is anticipated that this can be secured by condition.

Sustainability

- 6.58 The scheme aims to achieve BREEAM ‘excellent’ rating in line with the local policy requirements as per Policy CP15 and the BREEAM Pre-Assessment has been completed and confirms that this level has been achieved.
- 6.59 To ensure a holistic approach, the consideration of sustainability of this development has been included from the start of the project to ensure that the sustainability principles have been embedded into the scheme’s design, construction, operation and occupation.
- 6.60 The site itself is previously developed and as such the reuse of the land is a good starting point. In addition, it is in a highly sustainable location, with a range of transport modes available and the buildings and landscaping themselves have been considered in detail with sustainable features included within the design of the building and these include:
- Significant amount of glazed walling around entrance areas and stairwells - glass specification and orientation will minimise the impact of solar gain and glazing will also facilitate high levels of natural daylight minimizing use of artificial lighting;
 - Detailed design and interior fit-out will specify low energy lighting, fixtures and fittings together with low energy heating and ventilation systems;
 - General lighting will be achieved using LEDs with wherever possible automatic controls to detect occupancy and avoid energy wastage;
 - A+ rated energy labelled white goods to be included within the fitout;
 - Ecological enhancements supported by a robust and considered planting scheme – also achieves defensible space and amenity for residents;
 - Recyclable and non-recyclable waste facilities provided in secure, enclosed bin storage areas as part of the detailed development.

Occupier Amenity

- 6.61 LP Policy DG4 states that residential development should ensure a quality of amenity which allows residents to feel at ease within their homes and gardens and this is described in more detail in the Residential Design Guide Supplementary Planning Document. However, this relates to the concept of a more traditional housing model, which the Co-Living approach does not adhere to.

- 6.62 The Co-Living model seeks to attract a particular occupier who wants the privacy of an individual room and the convenience of a managed building, within a centrally located space. As such personal outside amenity space is not a requirement and residents utilise the wider city spaces for their informal recreation, rather than more traditional gardens.
- 6.63 The Co-Living building provides for shared amenity spaces in relation to kitchens, lounges and workspaces which are generally communal and reflect the aspiration to create a small community, or series of communities, within the wider Co-Living area.
- 6.64 Within the building individuals will have their own en-suite and some, within the studios, will have a small kitchenette. However, the majority will share a kitchen with others in their apartment and everyone will share the wider lounge areas and workspaces. A central laundry is provided for use by all residents.
- 6.65 The amenity spaces provided for those living within the Co-Living accommodation is therefore reflective of the needs of the occupiers and the community they live in.

Impact on Neighbours - Overlooking

- 6.66 Adopted Local Plan Policy H2 states that development should be permitted at the highest density that can be achieved ‘without detriment to local amenity’ and emerging policy DD13 relates to amenity and states that development will be permitted provided that it does not result in unacceptable harm to the amenity of neighbouring residents.
- 6.67 The proposed development is a high-density scheme, seeking to maximise the potential of this highly sustainable location within the city centre. As such the maximum benefit of such sites should be sought, in line with national and local policies. However, it is acknowledged that any scheme must respect the privacy and amenity of neighbours.
- 6.68 The scheme has therefore been carefully designed to consider the impacts on adjacent properties and previous sections have already discussed the issues of overall scale and solar shading. During the preparation of proposals, the scale of the overall buildings have been adjusted and significantly reduced in order to mitigate impacts on neighbouring properties.
- 6.69 Generally, the proposed building, in order to avoid impacting on buried archaeology (as described above) has been contained within the existing building footprint. This has generally resulted in the building not extending close to the site boundary and therefore to buildings on Northernhay Street.
- 6.70 The City Council adopted its Residential Design Guide SPD in 2010. This was prepared specifically to focus on residential housing developments, particularly those of the volume housebuilders on suburban estates. It was not specifically prepared to address redevelopment of dense urban sites, such as The Harlequins Centre. However, the principles applied in the SPD and the guidance set out, notably in regard to privacy and overlooking, have been considered during the design phases for the Harlequins Centre site.
- 6.71 In regard to Privacy, the SPD policy under para 7.16 indicates that a distance of 22 metres between habitable room windows should be adopted in order to minimise potential for overlooking.

- 6.72 For the majority of the development the distance is maintained at the very minimum and in most areas bettered. However, there are points where the hotel or Co-Living blocks do extend into this zone. In these areas the buildings have been specifically designed to avoid windows of habitable rooms overlooking each other. This is detailed in Section 4.11 of the Design & Access Statement where the various relationships are illustrated.
- 6.73 The DAS shows that the western end of the hotel block, facing to No42 Northernhay Street, will be within 22 metres of the dwellings and as a result the end façade will not have any bedroom or living space windows ensuring that any overlooking is avoided. The end of the building closest to the nearby dwellings is a stairway and as such does not have any habitable rooms. However, even so, the elevation has been carefully considered and earlier proposals which included significant elements of glazing have been amended in order to avoid any overlooking.
- 6.74 Within Block One, the Co-Living block, there are a small number of bedrooms which are within 22m of a neighbouring property (No 39 Northernhay Street) which has one-bedroom window that faces the application site. The Design and Access Statement at section 4.11 demonstrates how the windows in this location have been arranged on an angle so as to avoid any perception of overlooking from these rooms to the adjacent single bedroom window.
- 6.75 Through careful design it has therefore been possible to avoid direct overlooking of the dwellings adjacent to the Harlequins Centre site even in this high-density urban location.

Impact on Neighbours - Nuisance

- 6.76 It is accepted that neighbours may be disturbed by the activities of future residents of both the Hotel and the Co-Living block.
- 6.77 Initial proposals for the hotel building included a restaurant and bar at the ground floor level which had an outside dining area, fronting onto the public space between the buildings. This was identified as a point of concern by residents, worried about the impact of late-night dining and drinking in this area. As a result, the outside seating area for the hotel has been removed from the plans.
- 6.78 There will be the possibility for noise and nuisance to be generated by residents of the Co-Living accommodation and therefore a 7 day, 24 hour presence will be provided for the block by the operators. This is documented in the Management Plan which has been prepared for the site and is submitted with this application. This confirms that, during office hours, a manager or their deputy would be present on the site. Whilst at evenings and weekends security staff will be present and have access to the CCTV, which will cover the block and the external spaces, including the Pocket Park at the south end of the site in order to reduce the possibility of undue noise and nuisance.
- 6.79 In these ways the potential impacts of the development proposals on neighbouring properties have been mitigated.

Accessibility

- 6.80 The site is within in a highly sustainable location and redevelopment is consistent with the principles of sustainable development, a key consideration as per paragraph 11 of the NPPF. The site is situated within the city centre on an important pedestrian route from the city's main railway station at St. David's

to the high street, less than 200m to the north east. The proximity to public transport nodes is further enhanced by the presence of Exeter Central Station and several bus stops, being located within 100-200m of the site.

- 6.81 Exeter Central provides connectivity to a number of local destinations including Exmouth, Newton Abbot, Paignton, Honiton and Barnstaple and more widely, via Exeter St. David's Railway Station, to the Midlands, Bristol, Cornwall and London Paddington.
- 6.82 The no. 56 bus service can also be accessed from the station which provides regular access to Exeter Airport. This is in accordance with paragraph 103 of the NPPF, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes and Policy T3 which seeks development laid out and linked to existing or proposed developments and facilities in ways that will maximise the use of sustainable modes of transport.
- 6.83 Exeter High Street and its main primary retail area comprising key stores and centres such as the Guildhall Shopping Centre are located within close proximity.
- 6.84 Southernhay and Dix's Fields, the major employment destinations within the area are both located within circa 10 minutes from the Harlequins Centre. Further employment opportunities, such as Devon County Council and numerous business in the Quay area are within a half an hour walk (circa 2km).
- 6.85 This demonstrates that the site is already within a highly sustainable and accessible location as many of the services and facilities necessary to support a residential development are within walking distance of the site, thus negating the need to drive. If residents wish to travel further, the local public transport facilities provide opportunities to do so in a sustainable manner and this therefore meets the requirements of Policy DD20 which seeks to exploit opportunities for the use of sustainable transport modes and aims to ensure that sufficient attention is given to minimising the need to travel and reducing the dependence on the car.
- 6.86 The proposed development seeks to further enhance the accessibility and walkability of the area through new high-quality public realm spaces which will be provided within the development, including a new 'pocket park' at the Paul Street/Iron Bridge junction and interpretive space around the City Wall. Pedestrian access will be also enhanced with a new footpath between Paul Street and Maddocks Row. The existing adopted footway will be extinguished via a stopping up order with a new footway offered for adoption under a Section 38 Agreement. This new route will be more direct for users and provide a far enhanced experience than the existing route, which crosses the service yard of the existing shopping centre.
- 6.87 In addition to general streetscaping which will be introduced as part of the scheme, a number of highways measures and improvements are proposed to Paul Street including the narrowing of the existing carriageway, the introduction of on-street servicing and delivery bays and the widening of the existing footway to create a shared foot/cycleway. This will enhance the experience for a pedestrian or cyclist, encouraging these alternative modes in this important city centre location.

Car Parking

- 6.88 The existing site has two car parks, the first under the building, the second external at the junction of Paul Street and Iron Bridge. This in total provides 92 car parking spaces, which are generally pay and display, operated by the city council. There are, within the site, 10 spaces dedicated to a local business who have a long lease on these spaces.
- 6.89 The Transport Statement (para 6.12) accompanying this application notes that there has been a steady decline in the use of the Harlequins car park from *92% capacity on Saturdays, and 70% capacity during weekdays in 2014 to 81% on Saturdays and 59% on weekdays in 2019.*
- 6.90 This reflects the decline in the shopping centre itself but also the wider pattern of use and the availability of alternative car parks and modes of transport in the city centre.
- 6.91 The development proposal reduces the number of car parking spaces to a total of 42, which will include 4 disabled spaces and 2 Electric Vehicle Charging Points. Within the 42 spaces, the dedicated spaces for the local business will also be retained, identified within the wider car park in a specific area.
- 6.92 The proposed buildings themselves will be car free, with no dedicated spaces for residents of the Co-Living building. This approach reflects the national and local policies to minimise car use and to encourage the use of alternative modes of transport.

Cycle Parking

- 6.93 The scheme proposes 174 cycle parking spaces to be provided within a store in the ground floor of the Co-Living building. These spaces will be accessed from the courtyard fronting Paul Street and have level access to the street.
- 6.94 A total of 6 cycle parking spaces will be provided for hotel users and staff, located within the car park area beneath the hotel building. In addition, 16 cycle parking spaces will be provided on Paul Street located within the middle of the frontage for residents, guests and the public.
- 6.95 A total of 230 cycle parking spaces will therefore be provided across the site in a range of locations and in different forms, reflecting user requirements and more than meeting the Council's cycle parking standards

Servicing

- 6.96 The existing shopping centre is serviced from a large yard at the rear of the site, which is adjacent to the City wall and neighbouring properties on Northernhay Street. It is proposed to remove all servicing from this area and this will have consequential benefits for residents who will not be disturbed by vehicle movements.
- 6.97 The proposed development will be serviced from Paul Street, with the creation of two new parking bays within what was previously the highway carriageway. Widening of the pavements will enhance the pedestrian experience of the street and also provide space for the creation of the servicing bays.

- 6.98 Building entrances and also bin stores are located in close proximity to these servicing bays so that movement of deliveries and bins is minimised, and discussions have already been undertaken with the Councils refuse team in regard to the collection of recycling and waste. Weekly bin collections will be provided in order to meet the requirements of occupiers.

Transport impacts

- 6.99 The Harlequins Centre is located in a sustainable city centre location and the redevelopment is intended to be car free in its delivery of two new buildings and uses. A Transport Assessment (TA) has been undertaken by Awcock Ward Partnership (AWP) in relation to the proposed development to demonstrate the highway impacts of the use and to consider the traffic implications of the proposals.
- 6.100 The Assessment notes that if the assumption is made that the demolition of the Harlequins Centre would remove all existing traffic associated with its use, then the addition of the traffic arising as a result of the proposed development would still result in the overall reduction in traffic on Paul Street and Queen Street, and furthermore approximately 2,202 trips per day could potentially be removed from the highway network compared to the fully occupied shopping centre.
- 6.101 The TA concludes that overall, the local highway network would satisfactorily accommodate the additional traffic arising from the proposed development and it is unlikely to have a perceivable effect on the day-to-day operation of Paul Street, Queen Street or the existing signalised junction.
- 6.102 The traffic impacts of the scheme are considered to be acceptable at this location given the requirements of paragraph 108 of the NPPF.

Economic Impact

- 6.103 An Economic Impact Assessment of the proposal to redevelop the Harlequins Centre is submitted in conjunction with this application. The assessment found that the proposed development has the potential to generate expenditure of £9.1m per annum, with investment and expenditure going to local businesses and supporting local job creation.
- 6.104 The construction investment, the operation of the Co-Living facilities and hotel, and spending by new residents and visitors could support nearly 122 jobs within the area, and 55 of those are estimated to be net additional jobs to the local economy. When measured in economic output using the gross value added to the local economy (GVA), is estimated to be £2.4m per year in increased output in Exeter.
- 6.105 Much of the employment linked to the scheme will likely be through providing tertiary jobs which are accessible to many residents thus increasing economic activity within Exeter and providing jobs currently sought by local unemployed residents.
- 6.106 The economic assessment also found no or limited negative impact on local community services, as the scheme proposes improved public realm and well-being around the vicinity, and there was also scope for achieving increased business rates.
- 6.107 The proposed development seeks to provide investment opportunities and support growth within Exeter which will attract further investment and increased local spending through the occupation of the scheme. As such, it meets with the aims of the NPPF through contributing to sustainable development.

Ecology

- 6.108 An ecological Phase 1 Habitat Survey of the site was undertaken in early 2019 and found that the habitats present were of low ecological value and there was no evidence of protected species residing on the site.
- 6.109 The construction of the development will result in the loss of three semi-mature sycamores, one cherry tree and associated ornamental shrubs. It will also result in the loss of potential nesting locations on the buildings and within trees and ornamental shrubs. However, the loss of these potential nesting habitats for common bird species is unlikely to significantly affect local bird populations and would be mitigated by the inclusion of bird boxes within the design of the new buildings.
- 6.110 Surveys were also undertaken to assess the potential for bats to utilise the existing site and concluded that there is no evidence of roosting within the buildings or trees.
- 6.111 Therefore, it is concluded that the existing site has a low ecological value and that the development represents an opportunity to create a net biodiversity gain.
- 6.112 A number of features to enhance biodiversity on the site are included as part of the scheme. These include a comprehensive landscape scheme for the site, the inclusion of brown and green roofs on each of the blocks including pre-seeding to ensure early establishment of vegetation and 'bug hotels'; a green corridor adjacent to the Roman Wall to provide a resource for pollinating invertebrates such as bees and butterflies; and shade tolerant planting beneath the existing car park ramp including ornamental and native plant species.
- 6.113 Upon the implementation of the proposed biodiversity enhancement features, there will be an overall net gain in biodiversity within the site in accordance with paragraph 175 of the NPPF and Policy CP16 of the Exeter City Core Strategy.

Trees

- 6.114 An existing tree survey and arboricultural impact assessment has been carried out by Aspect Tree Consultancy Ltd for the proposed development. This report considers the direct and indirect effects of the proposed development in relation to the existing trees; evaluates the magnitude and significance of arboricultural impacts and makes recommendations for control measures applicable throughout the construction stages of the project.
- 6.115 There are five trees proposed for removal, four of which are Category B trees as a group on the site and one Category C tree as an individual. None of these are the highest category (Category A) and they are generally considered to be of moderate quality or poorer.
- 6.116 The trees to be removed are locally visible from the public realm in close proximity to the site, due to the presence of surrounding buildings and inherent topography. The trees are not visible in the wider townscape. The proposed trees to be removed are of poor individual quality with a limited viability and the visual impact of tree removal is of a low magnitude. The retained trees will soften the loss of TG1 due to their strategic location on the site boundary and current screening value.

- 6.117 New planting is proposed resulting in a significant net gain in the quantity and quality of the tree cover, resulting in a long-term improvement to the site and locality.

Air Quality

- 6.118 An air quality assessment has been prepared by Kairus Ltd. The assessment has been carried out in accordance with the latest air quality planning guidance. Air quality in the vicinity of the Site is currently meeting the UK air quality objectives, although Queen Street has been designated an Air Quality Management Area due to past exceedances of the nitrogen dioxide objective.
- 6.119 The development would reduce queuing on the car park access ramp, thus reducing emissions. The scheme design would also widen and break up the existing facades on Paul Street, aiding dispersion of traffic related emissions. Overall the impact of the scheme would not be significant in air quality terms in accordance with Core Strategy CS Policy CP11 which states that development should be located and designed so as to minimize and if necessary, mitigate against environmental impacts, especially within Air Quality Management Areas.

Noise

- 6.120 The proposals have been amended following consultation to seek to minimise impacts on neighbours, including the removal of outdoor seating space for the restaurant/bar. In addition, the site will be managed 24 hours a day and this will serve to minimise disturbances which may otherwise arise from the activities of residents.
- 6.121 In order to support the application, Clarke Saunders Acoustics have undertaken a Noise Assessment of the proposed development.
- 6.122 Measurements have been made of the prevailing noise climate at the locations of the proposed development. The measured noise levels have been assessed in accordance with the National Planning Policy Framework with reference made to the relevant guidance set out in ProPG: Planning and Noise for new residential developments.
- 6.123 The noise assessment has considered the requirements for mitigation measures as appropriate for the proposed residential development, to achieve suitable internal and external noise levels, and acoustic specification requirements for proposed façade elements and other mitigation have been determined on the basis of the relevant guidance.
- 6.124 The potential for noise emissions from the proposed development have been considered and noise criteria have been proposed based on the requirements of BS4142:2014, and the intention for these criteria to form the basis of a BS4142:2014 assessment once the design development and plant selections have been finalised to minimise impacts on the neighbouring units and the proposed end users in accordance with emerging policy DD13 which relates to amenity and states that development will be permitted provided that it does not result in harm to the amenity of neighbouring residents.

7 Conclusion

- 7.1 This Planning Statement has been prepared to support an application for the redevelopment of the Harlequins Centre, Paul Street, Exeter. The statement has set out the background to the site and the proposals, the Development Plan and provided an assessment of the scheme against the relevant policies of the City Council and the NPPF.
- 7.2 The site is an existing shopping centre, but one which has struggled to provide a quality retail offering and has, for a number of years, had significant levels of vacancy and an increasingly secondary character. As such, the council's own study in 2015 anticipated uses other than A1 retail would replace the existing units.
- 7.3 Most recently, the Council's Liveable Exeter Vision (which is an aspirational statement of intent and not a planning document) proposed the redevelopment of the site for a mix of uses, including residential.
- 7.4 It is therefore considered that, despite the historic and anachronistic allocation of the site as part of the primary shopping frontage, there is support for the redevelopment of the Harlequins Centre for uses other than retail.
- 7.5 The initial proposals for the redevelopment of the site focused on a mix of uses including a hotel and student accommodation. A hotel is an acknowledged town centre use and evidence demonstrates a shortage of existing hotel rooms within the city centre. As such, the introduction of a hotel is considered to be in conformity with the development plan.
- 7.6 The submitted application seeks approval for a new form of housing provision, Co-Living. This is intended to meet a need arising generally from young professionals who are seeking good quality accommodation in a managed environment where there is a sense of community, but the terms are flexible. The proposed building will be managed by a central organisation who will have a presence on site 24 hours a day and will provide supervision for the building and external areas.
- 7.7 Given the nature of the two proposed uses and the clear difficulties with the existing use, it is therefore considered that the principle of the redevelopment of the Harlequins Centre from a retail mall to a mix of hotel and Co-Living accommodation is in line with the Development Plan. In addition, and in line with the calculations of the Housing Delivery Test Measurement Rule Book, the scheme would provide circa 165 dwellings against the City Council's annual housing target.
- 7.8 The layout and scale of the proposed development has been carefully considered and active dialogue with Exeter City Council, Devon County Council and Historic England has been undertaken through the evolution of the scheme.
- 7.9 The fundamental layout of the building blocks has been to focus redevelopment within the existing footprint of the Harlequins Centre so as to minimise any potential impacts on buried archaeology. In addition, no development is proposed within 500mm of the city wall, a scheduled monument which is located to the western boundary of the site. In these ways direct impacts on historic assets are being avoided and/or minimised.

- 7.10 The site does lie within a conservation area and in close proximity to listed buildings, notably on Northernhay Street. There are also wider heritage assets notably Exeter Cathedral. The setting of these assets has been carefully considered through the design process and a full Landscape and Visual Impact Assessment (LVIA) prepared with which to judge the impacts from key viewpoints.
- 7.11 During the design process (and as documented in the Design & Access Statement) the scale of the buildings and the materials to be employed has evolved in order to address the concerns expressed by a range of consultees including local residents.
- 7.12 The Historic Environment Impact Assessment submitted with this application considers each of the heritage assets and the potential impact upon them. It is accepted that the scheme will have some negative impacts on assets and on neighbouring properties. However, the assessment has concluded that the overall impact of the scheme will be “less than substantial” and as such it is for the Council to balance any impacts that the scheme might have on the heritage assets, against the benefits of the scheme.
- 7.13 The proposed scheme will remove the Harlequins Centre, which it is accepted has a negative impact on the conservation area and creates a very poor environment on Paul Street. The replacement buildings will bring more activity and vibrancy to Paul Street, whilst also reducing the canyon like appearance. It will also support local tourism and understanding of a historic context of the area through the creation of a small interpretation centre within the site. This will include interpretative material for the history of the site and be a focus for walking tours of the city’s history.
- 7.14 The highway width within Paul Street will be reduced and the footpaths widened to encourage pedestrians and cyclists and to enhance the public realm through good quality materials and street furniture. Servicing of the buildings will be undertaken from bays on Paul Street, removing the need for large servicing areas to the rear of the building, adjacent to the historic city wall and in close proximity to neighbours. Deliveries to the buildings and the collection of waste and recycling will be provided from the servicing bays and bin stores are provided in close proximity to the bays in order to facilitate easy movement. Waste collection has been discussed and agreed with the relevant officers of the city council and weekly collections will be provided for the site.
- 7.15 The scheme will create new public spaces at ground floor level, with high quality landscaping and a new pocket park at the Paul Street/Iron Bridge junction. Resulting in a net gain for biodiversity across the site.
- 7.16 The buildings themselves have been designed to achieve BREEAM excellent, utilising high quality materials, green roofs and orientating the buildings to maximising the benefits of solar gain. Energy efficient boilers will provide heating and hot water across the buildings, supplemented by Photovoltaic Panels.
- 7.17 The scale of the buildings has been discussed and altered throughout the design process. Initial proposals for up to 20 storey buildings were well received by the Design Review Panel. However, concerns raised from Historic England and resulted in lower buildings being adopted. The LVIA submitted with the application demonstrates that the proposed buildings will not be prominent in views from around the city, and that views within closer proximity will be limited to gaps between dwellings.

- 7.18 The proposed scheme will be significant in its scale, which will maximise the use of this previously developed site in a location connected by a range of transport modes. Solar shading studies have been prepared which demonstrate that the orientation and location of the buildings will not have a significant impact on the light enjoyed by neighbouring properties, or indeed will not shade the city wall to the extent that it is permanently damp and therefore more prone to decay.
- 7.19 Opportunities for overlooking have been carefully judged and where the proposed buildings are located close to (within 22m of) adjacent dwellings, the facades have been treated so as to avoid overlooking.
- 7.20 The scheme, as submitted will provide nearly 300 bedspaces for local residents who are looking for a particular form of accessible accommodation, reducing pressure on traditional houses in the city and as a result contributing 165 dwellings to the housing delivery figures for the Council through reallocation of some residents moving from established dwellings to the scheme's Co-Living option. In addition, the scheme will generate 7 new jobs within the Co-Living space and possibly 29 within the hotel, as well as construction jobs associated with the new building.
- 7.21 It is therefore considered that the proposals are in line with the Development Plan and supported by relevant material considerations that therefore should be supported by the Council and approved.

Appendix A– Application Documents

Application Supporting Documents

Plans:

EHQ-LHC-EX-ZZ L01.01 – Existing Site Location Plan

EHQ-LHC-EX-ZZ-L01.02 Existing Block

Plans, Elevations, Cross sections (existing and proposed) as per Drawing Issue Sheet (Revision N) attached – (LHC Design)

Supporting Technical Documents:

Design and Access Statement – (LHC Design)

An Introduction to Co-Living – (JLL)

Air Quality Assessment – (Karius Limited)

Acoustic Design Statement - (Clarke Saunders Acoustics)

Arboriculture Impact Assessment Report – (Aspects Tree Consultancy)

Arboriculture Method Statement – (Aspects Tree Consultancy)

Tree Protection Plans – (Aspects Tree Consultancy)

Drainage Strategy – (Cambria Consulting Limited)

Ecological Assessment Report – (EAD Ecology)

Economic Impact Assessment – (Porter Planning and Economics)

Electrical Services and External Lighting Strategy – (Hydrock)

Energy Statement – (Hydrock)

External Light Impact Assessment – (Hydrock)

Flood Risk Assessment - (Cambria Consulting Limited)

Drainage Strategy – (Cambria Consulting Limited)

Preliminary Geoenvironmental and Geotechnical Assessment – (Tweedie Evans Consulting)

Historic Environment Desk-Based Assessment, Volume 1 and 2 – (Triskelion Heritage)

Lighting Impact Assessment – (Malcolm Hollis LLP)

Landscape and Visual Impact Assessment - (LHC Design)

Landscape and Visual Impact Assessment Table - (LHC Design)

Landscape and Visual Impact Assessment Study Area – (LHC Design)

Landscape and Visual Impact Assessment - Illustrative Photographic Viewpoint (LHC Design)

Management Plan – (Fresh Property Group)

Planning Statement – (JLL)

Statement of Community Involvement - (Redwood Consulting)

Transport Assessment - (AWP)

Issue Register Revision N

Project:	Project Ref:	Date Issued:
<u>17161 Harlequins Centre</u>	<u>17161</u>	<table border="1" style="width: 100%; height: 20px; border-collapse: collapse;"></table>
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File: 		
Title: 		

Project	Origin	Zone	Level	DR	A	File Name
EHQ	LHC	EX	ZZ			L01.01 Existing Site Location Plan
EHQ	LHC	EX	ZZ			L01.02 Existing Site Block Plan
EHQ	LHC	ZZ	XX	DR	AR	01.03 Existing Key Plan
EHQ	LHC	ZZ	XX	DR	AR	01.04 Existing Site Survey 1 of 2 (Sheet 1)
EHQ	LHC	XX	XX	DR	AR	01.05 Existing Site Survey 2 of 2 (Sheet 2)
79868-MHL-00-01-M2-G-10200-A7 Existing Level 1						
79868-MHL-00-02-M2-G-10200-A7 Existing Level 2						
79868-MHL-00-03-M2-G-10200-A7 Existing Level 3						
79868-MHL-00-04-M2-G-10200-A7 Existing Level 4						
79868-MHL-00-05-M2-G-10200-A7 Existing Level 5						
EHQ	LHC	ZZ	ZZ	DR	AR	03.01 Existing Site Section 1-1 and 2-2
EHQ	LHC	ZZ	ZZ	DR	AR	03.02 Existing Site Section A-A and B-B
EHQ	LHC	ZZ	ZZ	DR	AR	03.03 Existing Site Section C-C D-D E-E
EHQ	LHC	XX	XX	DR	AR	03.04 Footbridge Sections
EHQ	LHC	ZZ	ZZ	DR	AR	04.01 Existing South West/South East Elevation
EHQ	LHC	ZZ	ZZ	DR	AR	04.02 Existing North West/ North East Elevation
EHQ	LHC	EX	ZZ			01.10 Proposed Illustrative Coloured Site Plan
EHQ	LHC	EX	ZZ			01.11 Proposed Illustrative Roof Plan

1. Preliminary
3. Measurement
5. Construction

2. Design
4. Tender
6. Record

Data Status:

Issuer's Initials:

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P = Paper

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Block 1 (B1)												
EHQ	LHC	01	LGF	DR	A	02.01 B1 - Lower Ground Floor Plan	C02					
EHQ	LHC	01	GF	DR	A	02.02 B1 - Ground Floor Plan	C02					
EHQ	LHC	01	UGF	DR	A	02.03 B1 - Upper Ground Floor (Mezzanine)Plan	C02					
EHQ	LHC	01	01	DR	A	02.04 B1 - First Floor Plan (Sheet 1 of 2)	C02					
EHQ	LHC	01	02	DR	A	02.05 B1 - Second Floor Plan (Sheet 1 of 2)	C02					
EHQ	LHC	01	03	DR	A	02.06 B1 - Third Floor Plan	C02					
EHQ	LHC	01	04	DR	A	02.07 B1 - Fourth Floor Plan	C02					
EHQ	LHC	01	05	DR	A	02.08 B1 - Fifth Floor Plan	C02					
EHQ	LHC	01	06	DR	A	02.09 B1 - Sixth Floor Plan	C02					
EHQ	LHC	01	07	DR	A	02.10 B1 - Roof Plan	C01					
EHQ	LHC	01	01	DR	AR	02.11 B1 - First Floor (Sheet 2 of 2)	C02					
EHQ	LHC	01	02	DR	AR	02.12 B1 - Second Floor (Sheet 2 of 2)	C02					
EHQ	LHC	01	ZZ	DR	AR	02.13 B1 - Plan Regions	C01					
EHQ	LHC	01	ZZ	DR	A	03.01 B1 Section A - A	C01					
EHQ	LHC	01	ZZ	DR	A	03.02 B1 Section B - B	C01					
EHQ	LHC	01	ZZ	DR	A	03.03 B1 Section C - C	C01					
EHQ	LHC	01	ZZ	DR	A	03.04 B1 Section D - D	C01					
EHQ	LHC	01	ZZ	DR	A	4.01 B1 South - East Elevation	C01					
EHQ	LHC	01	ZZ	DR	A	4.02 B1 North East Elevation	C01					
EHQ	LHC	01	ZZ	DR	A	4.03 B1 North West Elevation	C01					
EHQ	LHC	01	ZZ	DR	A	4.04 B1 South West Elevation	C01					
EHQ	LHC	01	ZZ	DR	A	4.05 B1 S-E2 and N-W02 Elevations	C01					

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EHQ	LHC	ZZ	XX	DR	AR	01.10	Proposed Site Key Plan	C01						
EHQ	LHC	ZZ	ZZ	DR	AR	03.10	Proposed Site Section 1-1 & 2-2	C01						
EHQ	LHC	ZZ	ZZ	DR	AR	03.11	Proposed Site Section A-A and B-B	C01						
EHQ	LHC	ZZ	ZZ	DR	AR	03.12	Proposed Site Section C-C, D-D and E-E	C01						
EHQ	LHC	ZZ	ZZ	DR	AR	04.10	Proposed SE and SW Elevations	C02						
EHQ	LHC	ZZ	ZZ	DR	AR	04.11	North East / North West Elevation	C02						
EHQ	LHC	EX	ZZ			04.12	- Illustrative Coloured South / North East Elevation	C02						
EHQ	LHC	ZZ	XX	DR	AR	06.01	Comparative Solar Study	C01						
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EHQ	LHC	ZZ	ZZ	DR	AR	04.12	Site-Wide Indicative 3D Views	C02						
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EHQ	LHC	ZZ	ZZ			06.07	3d Computer Generated image	C02						
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Appendix B – Retail Report

Harlequins Centre Redevelopment Exeter Retail Study

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1. Retail Trends

- 1.1. The two principal issues which have arguably had the greatest impact on retailers and retail spaces and which will continue to do so going forward, are the uncertainty over Brexit and the influence of technology and the power that it hands consumers.
- 1.2. There are of course other issues from the general economic background and the housing market to business rates and the way retailers are taxed, but, the first two currently dominate the market.

Brexit

- 1.3. Although we cannot comment where this is heading, many commentators have blamed the uncertainty over Brexit for the slight weakening of retail sales growth over the last six months.
- 1.4. Mintel¹ provide the following commentary; *Retail sales have certainly slowed a little as the chart of year-on-year sales growth shows. Leaving aside the Easter-distorted months there has been a downward trend in growth since last spring, though recent growth has only been at the lower end of the range seen through much of 2017.*

FIGURE 3: Retail sales, excluding fuel, year-on-year growth, 2017-19



Source: Office for National Statistics/Mintel

- 1.5. Leaving aside the question of Brexit, Mintel reports that real incomes are rising, inflation has moderated. The only problems are the small increases in interest rates and the slowdown in the housing market.

¹ UK Retail Rankings April 2019

- 1.6. This is also reflected in advice provided by Experian² which states that the near-term outlook remains clouded by uncertainty around Brexit and fears of a potential no-deal outcome. These concerns are likely to keep businesses and households cautious and hence, growth in both investment and consumer spending is set to remain lacklustre.

Online

- 1.7. The days of consumers primarily browsing high street stores for their next purchase are long gone. Today, the decision-making process takes in multiple channels and many numerous sources, often simultaneously. But that does not mean that walking around retail spaces browsing products is over; it means it forms only a part of a much wider consumer experience.
- 1.8. This line of thought is reflected by Mintel who state that the impact of online has come from the increase in retail capacity, in the sense of the number of places people can buy. Retailers are responding to that by cutting prices to try to hold on to market share. But that is not enough. With increased choice the weaknesses of some players, especially those who have not, or have not been able to afford to, invest in their businesses have been exposed.
- 1.9. However, JLL believe that far from signalling the death of bricks and mortar, technology has arguably breathed new life into retail spaces, making appropriate retail as important as ever for landlords and retailers alike. But now that transactions can take place anytime, anywhere, consumers need more of a reason to visit a store.
- 1.10. For retailers, the key to keeping the consumer entertained is to integrate physical and digital experiences to provide an interactive and all inclusive in-store experience that is combined with excellent service. Innovative retailers are responding and adapting store formats to provide the interactive element that many consumers now desire.
- 1.11. It is not that online is a superior way of shopping, it has different advantages, and while people get used to them it is increasing its share. At some stage we will reach an equilibrium between stores and online.
- 1.12. The advantages of stores are being able to see and feel the product, the retail experience, service from knowledgeable staff and being able to walk out with the product. Online offers the convenience of being able to shop when and where one likes, having the product delivered to wherever suits one best and having a far wider range than a store could possible stock or display.
- 1.13. Experian forecast that, non-store retailing will continue to grow rapidly, outpacing traditional forms of spending. They retain their assumption that non-store retailing will increase at a faster pace than total retail sales well into the long term. Growth momentum will be sustained as new technology such as browsing and purchasing through mobile phones and the development of interactive TV shopping boost internet retailing. Experian expect the SFT³ market share to continue to increase over the forecast period, although the pace of e-commerce growth will moderate markedly after about 2022.
- 1.14. The current level of SFT from 2017 is 17% and Experian forecast that 2018 would be circa 18.9% with the SFT share of total retail sales reaching almost 23% by 2022, rising to around 27% by the mid-2030s.

² Retail Planner Briefing Note 16 December 2018

³ SFT Special forms of Trading – all retail sales not carried through a store so online, but also markets, car boot sales etc,

- 1.15. Expectations of how demand for retail floorspace will be affected by the rapid expansion of SFT remains a key issue. While it is undeniable that the challenge to traditional store-based shopping will continue to grow strongly, Experian identify a number of crucial factors that temper the threat;
- Many stores sell online but source sales from regular stores rather than warehouses, implying an increase in required store floorspace to cater for rising internet sales.
 - Even if non-store retailing outpaces store-based shopping as assumed over the next 20 years, store-based shopping is still expected to continue to expand at an annual average of 1.8% per annum in per capita terms to 2037.
 - It is probable that sales via the internet will begin to grow less rapidly at some point in the next few years.
 - This leaves click-and-collect as the key driver of current and future internet growth. But since this requires a bricks-and-mortar presence in easily accessible locations, this is largely space demand neutral.
 - Home delivery with the goods delivered sourced from warehouses is not space demand neutral in the way that click-and-collect is. It presents a major potential threat to future demand for retail floorspace in the high street.
 - A significant development is multi-channelling, where internet shopping actually drives demand for traditional outlets. An increasing number of retailers are using bricks-and-mortar stores as a showroom for products, a service location and collection/drop-off points for online orders. In-store product and services offer forms part of a co-ordinated multi-channel strategy and will continue to support demand for retail space.

Leisure Sector

- 1.16. In addition to the impact Brexit and Online retailing have had on the high street there are also significant changes in the leisure sector both in terms of food and drink outlets and entertainment such as table tennis/crazy golf etc,
- 1.17. For some consumers, time is a more precious commodity than money. Places need to be destinations in their own right and offer an experience beyond pure retailing to compete for our time. One impact of this new found consumer expectation on the physical environment is the growth, both in quantity and importance, of the food and beverage sector.
- 1.18. The amount of space dedicated to the food and beverage sector across the global retail landscape is certainly increasing each year, as the growth in online sales continues apace. The amount of space typically dedicated to gastronomy has grown from 5% ten years ago, to 10-15% now in Europe. Well configured and complementary dining and drinking provision can add real diversity and vitality to major city markets worldwide and can often boost consumers' shopping experience and dwell time, as well as giving consumers a reason to keep coming back. However, an increased quantity of restaurants and bars does not necessarily equate to success. The food and beverage industry is going through a period of rapid

change, and an evolving offer, understanding drivers of performance and embedding flexibility are crucial to the long-term resilience and success of places.

- 1.19. Food halls, indoor markets dedicated to local food sellers and artisans, are on the rise with a surge of projects that have opened over the last few years and plenty more on the way. Many new developments offer a stylish way to both shop and eat-in by combining a multitude of restaurants, artisan products, and shared dining spaces under one roof. Food halls capitalise on a number of trends, such as local sourcing and social dining, and have proven to act as a successful anchor for shopping centres or to breathe new life into derelict but architecturally exciting space, such as former factories, warehouses, office buildings and market places.

Residential and Retail

- 1.20. Another trend emerging, with today's consumers looking to have a range of amenities on their doorstep, is that of retail and residential developments being built in ever closer proximity.
- 1.21. In the UK, some apartment schemes are now following in the footsteps of US developments and rising up alongside large-scale urban shopping centres.
- 1.22. European malls owner, Unibail-Rodamco-Westfield is venturing into rental living, backing a £670 million residential scheme next to its shopping centre in east London. Retail property group Intu, which owns the likes of Manchester's Trafford Centre as well as malls in Bristol, Nottingham and Glasgow, last year said it had identified enough land at its six UK centres for 5,000 homes and 600 hotel rooms.
- 1.23. Boosting the population of the immediate vicinity is a footfall driver. For tenants, the appeal of living close to a centre lies in convenience.

Investment Market

- 1.24. The high street sector witnessed a sizeable drop in transaction volumes during the final quarter of 2018 with volumes totalling £0.6bn, a 50% fall compared to the same period in 2017. Annually transaction level totalled £2.5bn, 30% down on 2017.
- 1.25. However, demand for prime high street assets remains healthy, as investors continue to focus on core assets and occupier resilience. It is the secondary stock that is struggling with increased focus on stock selection within the secondary market continuing to widen the divide in yield between better and poorer quality secondary stock.
- 1.26. Annually Shopping Centre investment volumes were down by 57% at £958m. The uncertainty surrounding Brexit continue to impact investor decision making, with particular nervousness from overseas investors who are adopting a 'wait and see' approach.
- 1.27. Looking ahead, we expect that where possible, REITS will take the opportunity to reshape their portfolios whilst the institutions will continue to dispose of smaller lots and focus on large, prime dominant retail assets. The increasing cost of financing (and restrictions on the availability of debt) and outward movement in valuations are key contributing factors to the closer alignment of vendor and purchaser pricing aspirations in the secondary market.

2. Exeter

- 2.1. Reviewing recent GOAD data for Exeter reveals that despite the current uncertainty and challenges in the market the centre is performing well.
- 2.2. If we compare this to the Exeter West End of East Devon Retail Study published in 2017 (EWEED) we can see that the city centre has been performing well for a number of years. This study uses historic GOAD data from April 2007 to provide a comparison of uses within the city centre.
- 2.3. Below we provide a comparison of the uses within the centre and how these have changed over time;

	April 2007			July 2009			November 2012			October 2015			November 2018		
	No.	%	UK	No.	%	UK	No.	%	UK	No.	%	UK	No.	%	UK
Convenience	36	5.7	9.6	34	5.4	9.5	40	6.2	8.7	39	5.9	8.8	52	7.3	9.2
Comparison	358	57.1	45.0	343	53.9	43.0	319	49.1	41.2	311	47.0	40.9	263	36.9	29.8
Service	182	290.0	33.5	191	30.0	34.0	221	34.0	36.3	264	39.9	36.5	329	46.1	49.2
Other	9	1.4	1.3	7	1.1	1.2	5	0.8	1.2	5	0.8	1.2	0	0	0.1
Vacant	42	6.7	10.9	61	9.6	12.2	65	10.0	12.6	43	6.5	12.6	69	9.7	11.5
Total	627	100	100	636	100	100	650	100	100	662	100	100	713	100	100

April 2007-October 2015 taken from Exeter West End of East Devon Retail Study

November 2018 taken from recent GOAD centre report.

- 2.4. The GOAD plan and report attached at Appendix 1 illustrate the main uses within the centre and a second plan shows where the vacant units are concentrated.
- 2.5. To note the Service category includes food/drink and leisure as well as financial and retail, we provide a breakdown of these uses below and a commentary on the outlets they include;

Sector	Total Number of Outlets	Experian Index (out of 100)
Retail Service	97	91
Leisure Service	173	100
Financial & Business Services	59	83

- 2.6. Within the retail service sector, there are a total of 97 outlets in Exeter City Centre. Retail Service Outlets include photo processing, health and beauty, dry cleaners, post offices travel agents etc
- 2.7. In total the retail service in Exeter City Centre is just below the UK Average with an index of 91. (100 being the UK average benchmark figure)
- 2.8. There is a total of 173 outlets offering leisure services in Exeter City Centre. Leisure services include bars restaurants, cinemas nightclubs etc, The GOAD report find that the city centre has an above average number of Disco, Dance & Nightclubs (index 208); Bars & Wine Bars (index 186); Cinemas, Theatres & Concert Halls (index 153) and Restaurants (index 146). Categories which are underprovided in Exeter City Centre include Public Houses and Hotels/Guest Houses. In relation to the number of hotels, the goad data collected in November 2018 identified only 3 hotels within the city centre which at 0.45% is almost half the national average of 0.75%.

- 2.9. There is a total number of 59 outlets offering Financial & Business Services within Exeter City Centre. This includes Legal and Financial Services, Printing & Copying and Employment & Careers. In total the financial and business service in Exeter City Centre is below the UK average with an index of 83.
- 2.10. The above breakdown broadly reflects some of the retail trends we have discussed in Section 1, with the number of retail service uses increasing as well as food and drink and leisure. Whilst there has been a small decline in comparison outlets it is still above the national average.
- 2.11. A key indicator of the health of centre is the number of vacant units and although we can see this has increased, the number of vacancies is still below the national average. We attach at Appendix 1 a plan illustrating where the vacant units are located within the centre and from this it can be seen that there are two noticeable clusters, the Harlequins Centre and Sidwell Street/around the bus station. Given that both these sites are subject to redevelopment proposals, and in very much secondary locations within the centre, it is likely that the number of vacancies reflect this rather than the overall health of the city centre. This is further reflected in the small cluster of vacancies which are found within the centre of the high street, which relate to the former Royal Clarence Hotel, which was destroyed by fire in October 2016. This impacted on the neighbouring retail units, three of which remain vacant but this is due to the physical impacts of the fire, rather than necessarily the health of the city centre market.
- 2.12. The EWEED Retail Study identified that the range of comparison goods stores in Exeter city centre is broad with many of the main national multiple retailers present. The recent GOAD survey also reflects this identifying representation from nearly all of the major national retailers.
- 2.13. Although the investment into Exeter by John Lewis and the success of the Princesshay scheme is a positive boost for the city centre it is important to note the problems being faced by the large department 'anchor' stores on a national level.
- 2.14. Debenhams struggled again in the year to August 2018, with like-for-like sales down 2.3%. In November 2018 Debenhams announced plans to close up to 50 stores after it reported the biggest loss in its 240-year history. The department store said it could close up to 50 underperforming stores out of its 165-strong store network in the next three to five years, leading to the loss of around 4,000 jobs. In April 2019 the first 22 stores to close were named, Exeter was not named within this first closure.
- 2.15. House of Fraser was taken over by Sports Direct in August 2018 after it very briefly went into administration. At the time of the acquisition Sports Direct's owner, Mike Ashley, said he intended to transform House of Fraser into the "Harrods of the high street". Subsequent to this a small number of stores have been identified for investment and a focus for designer brands. However, the House of Fraser store in Exeter is set to close.
- 2.16. For the 13 weeks to 29 December 2018 Marks & Spencer saw a 2.1% like-for-like drop in non-food sales. The company said the drop in clothing and home sales was as a result of fewer people visiting its stores due to several shop closures (21 full-line stores were closed in H1 2018/19 as well as three Outlets). Meanwhile, online sales grew by 14% in the category due to improvements made to the retailer's online operations and propositions. Mintel estimates that 84% of M&S' non-food sales come from clothing and footwear. Other categories, like homewares and beauty, are thought to be holding up M&S' non-food sales.

- 2.17. John Lewis reported total sales up 0.7% in the year to January 2019, but like-for-likes fell 1.4%. In September 2018 John Lewis took the decision to rebrand itself as John Lewis & Partners, while its sister fascia, supermarket chain Waitrose became Waitrose & Partners. The change is intended to highlight the partnership business model and culture which differentiates the group from its main competitors. The group opened a new store in Cheltenham in November 2018. In January 2019 the group announced that its Knight & Lee store in Southsea, Hampshire would close in the summer of the same year.
- 2.18. Overall, Exeter city centre has good levels of vitality and viability and remains a healthy centre. The EWEED also recognises that the city centre is healthy stating that *The key attributes of the city centre are its wide range of comparison and convenience goods retailers, its growing service use offer and falling vacancy rate. Notable positive changes since the previous retail study are the arrival of John Lewis and the growing number of service uses, bring the city centre back in line with the national average. Whilst not a physical change since the previous study, the Princesshay shopping centre continues to be very successful.* (EWEED retail study)
- 2.19. Overall the centre is healthy which means it is better able to sustain any impacts either from new development diverting trade from the centre or the loss of retail floorspace.

3. Proposal

- 3.1. The Harlequins Shopping Centre lies adjacent to Queen Street, with direct pedestrian access from Paul Street and also, via its upper floor, from the Guildhall Shopping Centre. It is, for the most part, a covered indoor shopping mall, along with a small outdoor area adjacent to Paul Street.
- 3.2. The existing amount of retail and leisure space is 4865 sq. m. All bar 195 sq. m (Hyde and Seek gifts) will be demolished. (4670 sq m).
- 3.3. According to the latest GOAD data the total amount of retail and leisure floorspace in Exeter city centre is 143,108 sq m and so this loss represents just **3.3%** of the total commercial floorspace.

Turnover

- 3.4. If we look closely at the current configuration and tenants of the Harlequins Centre, it provides us with the following picture;
 - The largest units which are and were occupied by national retailers are Poundland at 1241 sq. m and the former Multi York furniture store at 406 sq. m.
 - 490 sq. m of the floorspace is occupied by a gym
 - The remainder of the units are or were predominantly occupied by independent retailers and the unit sizes range from 18 sq. m up to 290 sq. m.
 - The centre currently has a high vacancy rate, this is in part due to the development proposals but it is important to note the GOAD plan contained in the EWEED retail study dated 2015 shows 7 out of the 24 units in the Harlequin Centre were vacant equating to a 29% vacancy rate (the national average for a city centre is currently 11.5%). Demonstrating that the centre has struggled over the last few years to attract tenants.
- 3.5. Given the tenant schedule, even if we were to assume some of the vacant units were occupied, the retail turnover of the centre is likely to be low.
- 3.6. We can make some assumptions on the retail turnover, it is however important to note that turnover figures are only available for A1 retail uses and therefore only A1 turnover can be estimated;
- 3.7. Hyde and Seek is being retained so the existing floorspace lost is 4670 sq. m. If we allow for circa 289 sq. m of new floorspace in the proposed scheme, then overall there is a reduction in of 4381 sq. m gross commercial floorspace.
- 3.8. We can then apply sales density figures to the floorspace being lost.
- 3.9. We look at Poundland separately as we have the sales density and floorspace figures for this unit and it represents a key anchor for the site.
 - Poundland sales density £1444 per sq. m (taken from Mintel Retail Rankings 2019).
 - Gross floorspace 1241 sq. m, net sales area 931 sq. m (this allows for 25% floor area for staff rooms, offices, stock etc which is typical for a store of this size)
 - Total turnover 2017 prices £1.34m

- 3.10. The remainder of the centre equates to 3140 sq. m gross. If we assume 10% vacancy rate, then there would be 2826sq m of gross floorspace trading at any given time. Some of this is food and drink/retail services use which we do not have turnover figures for, we therefore make a small deduction of 400 sq. m to account for these uses.
- 3.11. This leaves a gross floorspace of 2426 sq. m. Once netted down to sales area (this allows 20% of the floor area for stock, staff rooms, offices etc reflecting the smaller unit size) this would equate to 1941 sq. m.
- 3.12. We then look at the type of tenant within the centre and their sales density. We cannot be accurate as many of the tenants are independents and there is only data available on the national chains however we can provide a comparison as follows (in brackets indicates the retailer whose sales density we have used);

- Multi York £833
- The suit company (moss bros) £1038
- Sportswear (myleta sports) £434
- Phones (EE) £441
- The cook shop (pro cook) £781

If we average these out we get a sales density of £705.

This generates a turnover of £1.37m

When added to Poundland it would be a loss in retail turnover in 2017 prices of £2.71m.

- 3.13. Although not a direct comparison as this is in 2017 prices as opposed to the 2015 price year used in the EWEED retail study, it is still useful to place this in context that the EWEED Retail Study, identified that the comparison retail turnover of the city centre in 2016 was £757.6m, rising to £865.2m in 2021 (tables 7a and 7b appendix B). The loss in turnover from the Harlequin Centre therefore equates to less than 0.4% of the total comparison retail turnover of the city centre.
- 3.14. If we include the convenience turnover of the city centre within this, (£59.3m 2016 (table 5a) £61.6m 2021 (table 5b)) then the percentage figures drops further to 0.3%.
- 3.15. The loss of the Harlequins Centre equates to a small loss in floorspace of 3.3% of the total city centre floorspace, and when looking at the types of retailers and composition of the centre it represents a much smaller percentage loss in turnover for comparison goods in the city centre of less than 0.4%.
- 3.16. Given we have found the centre to be healthy the loss of less than 0.4% of the centre turnover will have no impact on the vitality or viability of the centre as whole, in fact as we discuss further on the proposal could help strengthen the retail core and drive increased footfall in the centre.

4. The Role of the Harlequins Centre

- 4.1. The adopted Core Strategy is from 2012 and therefore in terms of retail policy is somewhat out of date. We note that within this the Harlequins Centre is within the Primary Shopping Area, albeit very much on the edge of this.
- 4.2. More relevant are the findings of the EWEED retail study which we touch upon above.
- 4.3. The EWEED Retail Study finds a need to provide and plan for additional comparison floorspace within the city centre and in doing so reviews a number of potential sites. The Harlequins Centre is one of the sites under review.
- 4.4. The Retail Study identifies that the Harlequins Centre generally contains local independent traders and has a tired and dated appearance. Despite the busyness of Queen Street and the Guildhall centre the Harlequins centre has much lower levels of accessibility and does not appear to take advantage of the opportunities presented by this passing trade.
- 4.5. The Retail Study recommends that rather than remaining in the Primary Shopping Area a change to a secondary shopping area classification may offer some more appropriate opportunities for diversification. Such diversification may also be aided by the on-going refurbishment of the Guildhall Centre. The Retail Study recommends that the diversification could introduce residential uses on the upper floors.
- 4.6. We would concur with these findings. The centre is outdated and in the wrong location to attract typical high street retailers. Whilst it has a function in providing space for independents this is not enough to sustain its commercial viability. As noted above investment is being focused on prime assets in centres and the gap between the attainable yield in prime and secondary locations is growing
- 4.7. As can be seen from the GOAD plan the Harlequin Centre very much sits on the periphery of the main retail activity. Some of the key main drivers of footfall and anchors for a centre are the department stores which currently direct shoppers from John Lewis in in the East to Debenhams in the Princesshay and House of Fraser and Marks and Spencers along Main Street. Although the Guildhall Centre contains some notable retailers such as Primark, it is really the main department stores and comparison retailers such as Next that drive the footfall.
- 4.8. Although Exeter is currently healthy, given the well documented challenges facing the high street, the Council and landowners should be looking to strengthen and protect the core commercial areas. The threat of the House of Fraser closure and the uncertainty over the future of Debenhams could have a significant impact on the health of the city centre far more so than the proposed development at the Harlequins centre. Tightening the primary shopping area boundaries and directing retail demand to the core areas, can only help future proof against such uncertainty in the market.
- 4.9. We note that recent investment into the Guildhall Centre into the food offer has improved the appearance and attractiveness of this area, however not all the food outlets appear to be thriving. Our research suggests the market is saturated with the casual dining offer, which is exactly the type of occupier that has gone into the Guildhall. This area may do better with smaller unit sizes to allow for diversity and smaller independent food and beverage operators. Notwithstanding this the proposal for the Harlequins Centre

will bring higher footfall to this part of the city centre and will help support these uses. This will help to protect the long-term investment into the Guildhall centre and strengthen its appeal and offer.

- 4.10. Overall strengthening the core area and looking to diversify uses in the peripheral areas particularly when this brings additional footfall to the centre, such as in the case of this proposal should be encouraged.

4. Conclusion

- 4.1. Overall this report provides a very high level view on the retail market and the challenges going forward. It is very well documented and publicised that the traditional high street is under threat and local authorities and landowners have to be proactive to move their centres forward and protect against the impacts of an uncertain economic climate and a growing online culture.
- 4.2. Exeter is currently very healthy, investment into the Princesshay Centre and by John Lewis have helped to retain the centres attractiveness to shoppers. However, with the threat of large departments stores closing and an ever growing move to online shopping, the centre does need to keep evolving.
- 4.3. Looking to protect and strengthen the core retail area whilst allowing diversification on the periphery is one way to try and futureproof the centre. Particularly where the diversification brings more residents and footfall into the area.
- 4.4. The Harlequins Centre has struggled for many years and with the investment market now very much focusing on prime stock and the better secondary locations it is difficult to maintain its commercial viability. It is not a key driver of footfall or for spending in the city centre. It very much sits on the periphery of the retail area, a fact that was highlighted by the Councils own Retail Study which identified that it should be taken out of the primary shopping area and be allowed to diversify away from retail uses.
- 4.5. When considering its impact and influence on the city centre retail market, it represents only 3.3% of the centres commercial floorspace, and given the tenant mix a much small proportion of the overall turnover of under 0.4%. The loss of this floorspace will therefore not have any material impact on the health and function of the city centre.
- 4.6. The proposal will bring residents and footfall to the city centre and should help the Guildhall Centre capitalise on its recent investment into food and beverage uses. Concentrating retail uses within a smaller core area will help focus retailer demand in the centre and may help if some of the department stores are forced to close.
- 4.7. Overall, we conclude that this proposal should be seen a positive investment into the city centre, driving footfall and leisure uses into the city. The loss of the retail floorspace will have no significant impact on the health of the city centre but rather help bring the focus for retailer demand into the core retail area.

Appendix 1 – Goad Plans and Data



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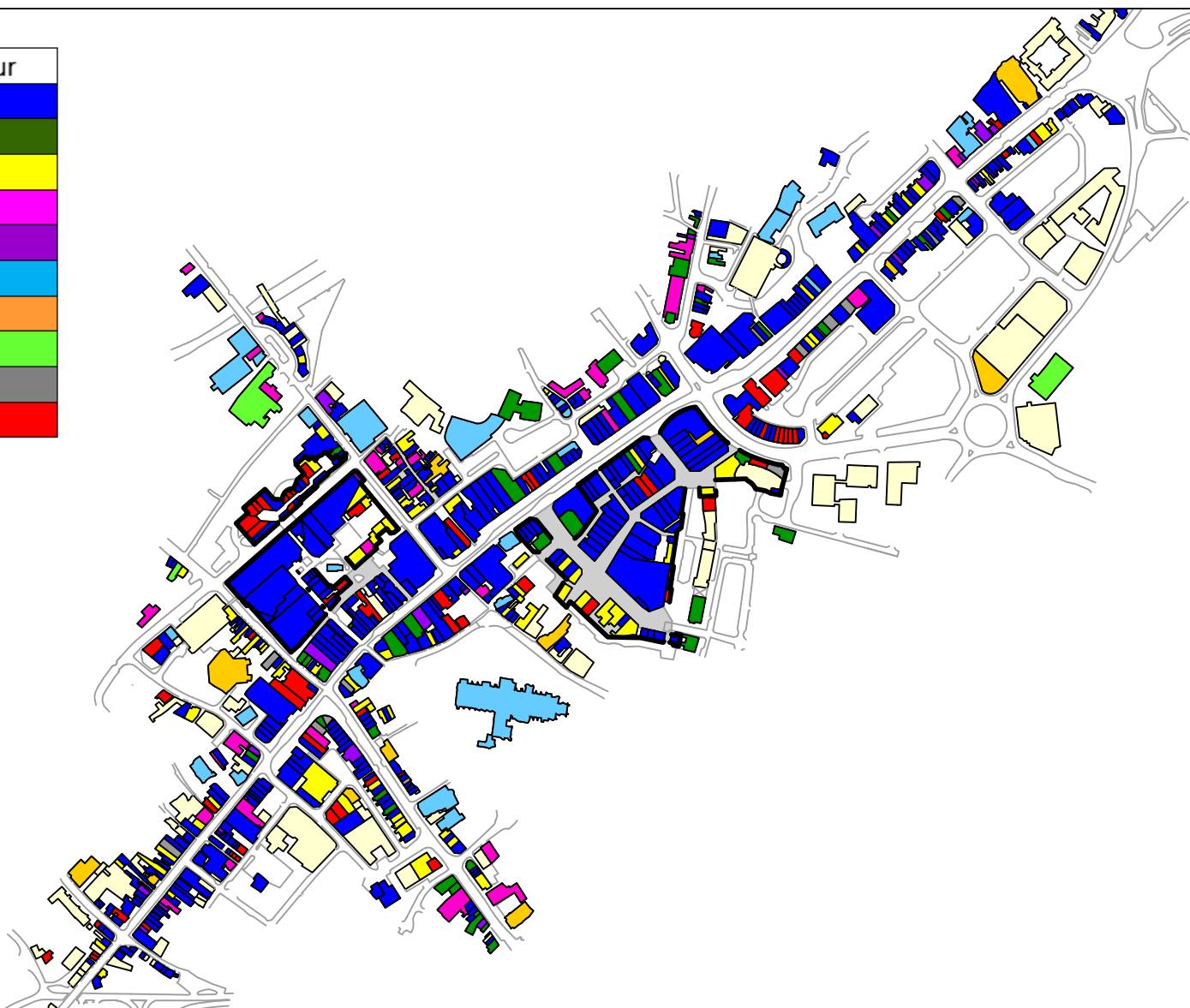
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Use Class	Colour
A1	Blue
A2	Green
A3	Yellow
A4	Magenta
A5	Purple
D1	Cyan
D2	Orange
C1	Light Green
Sui Generis	Grey
Vacant	Red



350 metres

Experian Goad Plan Created: 15/05/2019
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Use Class	Colour
Vacant	Red
Other Uses	Yellow



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Goad Category Report

Exeter

Survey Date: 19/11/2018

GETTING THE MOST FROM YOUR GOAD CATEGORY REPORT

Each shopping centre has its own unique mix of multiple outlets, independent shops, convenience and comparison stores, food outlets and vacant premises.

Understanding the retail composition of a centre and its effect on local consumers is crucial to the success of any business. By studying the information in the report, you will be able to examine site quality, evaluate threats opportunities, and assess the vitality and viability of the centre. However, you will only achieve this if you are aware of the various implications of the data that you see. This guide is designed to help you interpret the information you see on the Goad Category Report.

1. The Local Area

When evaluating the quality of a site, it is often beneficial to compare it with other local shopping centres. Category Reports are available for the majority of retail centre that we map.

2. The Indexing System

A simple indexing system appears throughout the report. This illustrates the difference between a percentage figure for the centre and the UK average. An index of 100 represents an exact match, anything less than 100 indicates a below average count for the centre, and a figure over 100 represents an above average count.

For example, if restaurants accounted for 10% of a centre's outlets and the UK average was also 10%, the index would be 100. If however, the UK average was 8%, the index would be 125.

The index is an effective gap analysis tool and can be used to identify areas that are under and over represented within a centre. A retail category that is heavily under represented could indicate poor local demand. On the other hand, it could show that there is an untapped market waiting to be serviced. Either way, it provides a strong indication that the site will need to be examined further.

3. Floor Space

The floor space figures shown on the report are derived from the relevant Goad Plan, but only show the footprint floorspace, and the site area without the building lines. They should not therefore be read as a definitive report of floor space, but do provide a useful means of

comparison between centres, as all outlets are measured in a consistent manner.

4. Vacant Outlets

Comparing the number of vacant outlets with the GB average provides a useful insight into the current economic status of a centre. For example, a high index generally represents under-development or decay, while a low index shows a strong retail presence.

5. Multiple Outlets/Major Retailers

A multiple retailer is defined as being part of a network of nine or more outlets. The presence of multiple outlets can greatly enhance the appeal of a centre to local consumers. The strong branding and comprehensive product mix of retailers such as Marks & Spencer, Boots and HMV are often sufficient in itself to attract consumers to a centre. 30 national multiples have been identified as Major Retailers, (i.e. those retailers most likely to improve the consumer appeal of a centre).

The presence of multiple outlets and major retailers can have a significant impact on neighbouring outlets. While other retailers will undoubtedly benefit from increased pedestrian traffic, (and therefore increased sales opportunities), multiples provide fierce competition for rivals in their retail categories.

Also available from Experian:

The Goad Centre Report

This defines the retail extent and composition of a centre; showing the number of premises in over 27 retail categories and detailing the space allocation across each of them. A comparison of these figures with the national average illustrates under or over representation by category, allowing you to assess the degree of competition or opportunity within the centre.

The Goad Distribution Report

Goad Distribution Reports provides a top-level analysis of the total retail mix and composition of a centre. It shows the number of premises in 16 categories and details the space allocation across each of them.

Retail Planner

Retail Planner is a service for retail planners, property consultants and retailers, providing comprehensive, up-to-date information for retail planning related decisions. Specifically we provide data for three different types of expenditure: Comparison, Convenience and Leisure. Each category is broken down into the European standard COICOP (Classification of Individual Consumption by Purpose) classification. Data is available at output area and postal sector levels. We can also provide data for predefined areas such as Local Authority District Boundaries.

Goad Paper Plans

These provide a bird's eye view of over 1,250 UK retail centres. The name, retail category, floor space and exact location of all outlets and vacant premises is recorded and mapped. Key location factors such as pedestrian zones, road crossings, bus stops and car parks are also featured. There are also over 800 retail park plans available

Goad Digital Plans

Digital plans are available online through our Goad Network system. This enables the user to View, Interrogate Edit & Print plans to their own requirements. For a demonstration logon to <http://www.goadnetwork.co.uk/demologin.asp>

Tailored Plans and Extracts

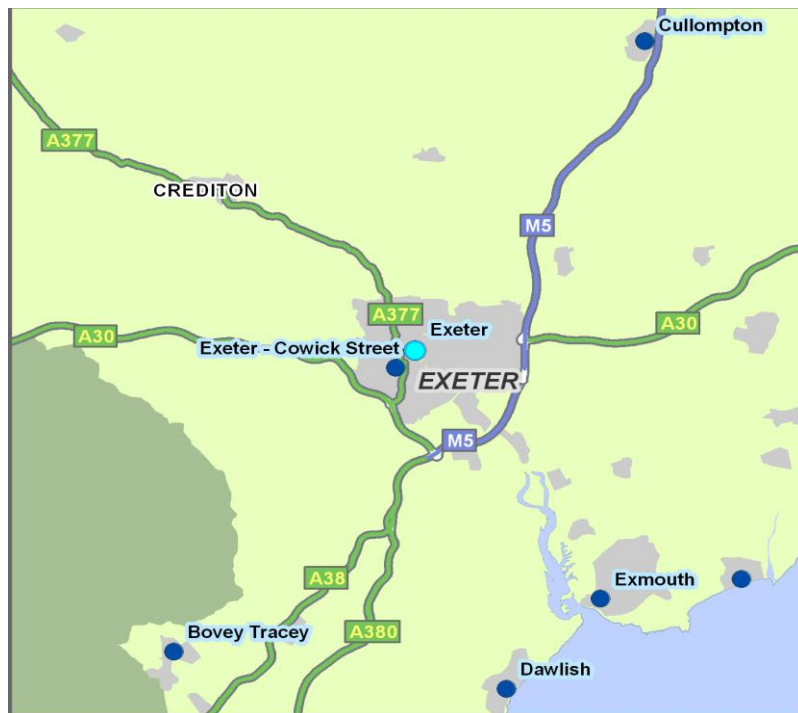
We are able to provide tailored plans and extracts which highlight the information most relevant to your enquiry.

The Retail Address Database

An extensive database covering the addresses of 360,000 retail outlets across the UK, this is a highly effective tool for site evaluation and competitor analysis.

For further details on these products or if you have any queries regarding your Goad Category Report, please contact Experian on: Tel: 0845 601 6011

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goad.sales@uk.experian.com



Nearest Location

Distance KM

Exeter - Cowick Street	1.15
Exmouth	14.20
Dawlish	16.44
Bovey Tracey	17.62
Cullompton	17.67

Major Retailers Present

Department Stores

Debenhams	1
House of Fraser	1
John Lewis	1
Marks & Spencer	1

Mixed Goods Retailers

Argos	1
Boots the Chemist	1
T K Maxx	0
W H Smith	1
Wilkinson	4

Supermarkets

Sainsburys	2
Tesco	2
Waitrose	0

Clothing

Burton	1
Dorothy Perkins	0
H & M	1
Monsoon Accessorize	2
New Look	1
Next	1
Primark	2
River Island	1
Topman	1
Topshop	1

Other Retailers

Carphone Warehouse	2
Clarks	1
Clintons	0
EE	1
H M V	1
O2	1
Superdrug	1
Vodafone	1
Waterstones	2

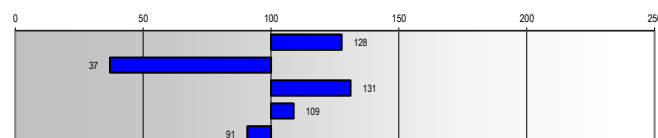
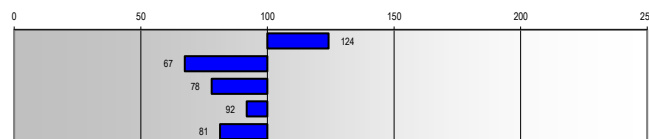
Multiple Counts & Floorspace by Sector

Counts	Outlets	Area %	Base %	Index
Comparison	138	52.87	42.59	124
Convenience	20	7.66	11.38	67
Retail Service	19	7.28	9.33	78
Leisure Services	53	20.31	22.10	92
Financial & Business Services	31	11.88	14.60	81

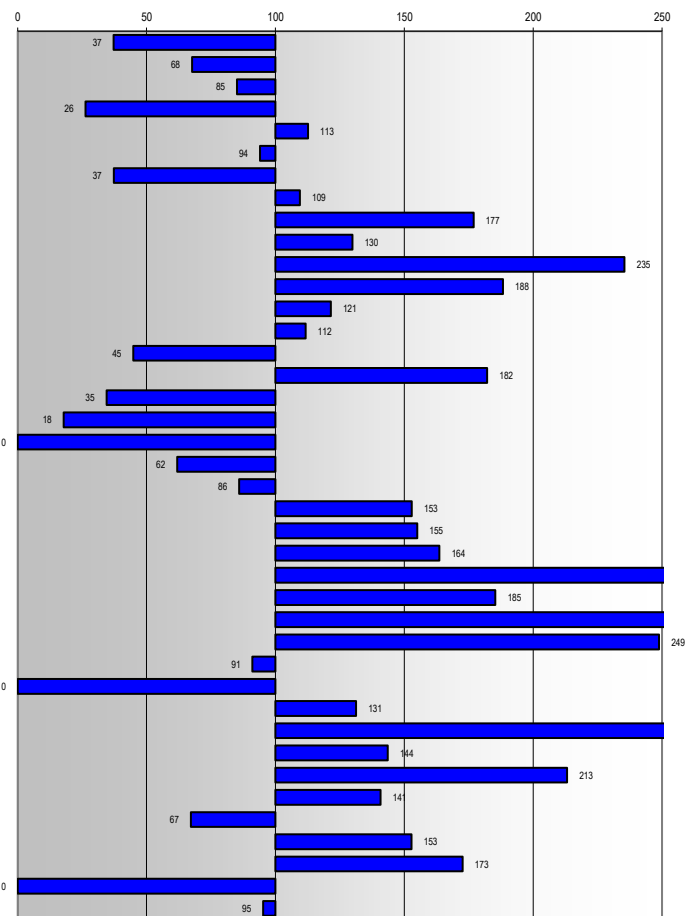
Total Multiple Outlets 261

Floorspace Sq Ft	Outlets	Area %	Base %	Index
Comparison	524,900	60.24	47.21	128
Convenience	76,900	8.82	23.80	37
Retail Service	41,600	4.77	3.64	131
Leisure Services	165,500	18.99	17.44	109
Financial & Business Services	62,500	7.17	7.91	91

Total Multiple Floorspace 871,400



Sector		Base: All UK Centres			
Comparison	Classification	Outlets	Area %	Base %	Index
	Antique Shops	1	0.14	0.38	37
	Art & Art Dealers	3	0.42	0.62	68
	Booksellers	3	0.42	0.49	85
	Carpets & Flooring	1	0.14	0.53	26
	Catalogue Showrooms	1	0.14	0.12	113
	Charity Shops	18	2.52	2.69	94
	Chemist & Drugstores	3	0.42	1.13	37
	Childrens & Infants Wear	3	0.42	0.38	109
	Clothing General	21	2.95	1.66	177
	Crafts, Gifts, China & Glass	15	2.10	1.62	130
	Cycles & Accessories	4	0.56	0.24	235
	Department & Variety Stores	6	0.84	0.45	188
	DIY & Home Improvement	6	0.84	0.69	121
	Electrical & Other Durable Goods	9	1.26	1.13	112
	Florists	2	0.28	0.63	45
	Footwear	12	1.68	0.92	182
	Furniture Fitted	1	0.14	0.41	35
	Furniture General	1	0.14	0.79	18
	Gardens & Equipment	0	0.00	0.05	0
	Greeting Cards	3	0.42	0.68	62
	Hardware & Household Goods	8	1.12	1.31	86
	Jewellery, Watches & Silver	17	2.38	1.56	153
	Ladies & Mens Wear & Acc.	18	2.52	1.63	155
	Ladies Wear & Accessories	22	3.09	1.89	164
	Leather & Travel Goods	3	0.42	0.13	321
	Mens Wear & Accessories	9	1.26	0.68	185
	Music & Musical Instruments	5	0.70	0.13	536
	Music & Video Recordings	3	0.42	0.17	249
	Newsagents & Stationers	4	0.56	0.62	91
	Office Supplies	0	0.00	0.02	0
	Other Comparison Goods	8	1.12	0.85	131
	Photographic & Optical	2	0.28	0.11	259
	Secondhand Goods, Books, etc.	3	0.42	0.29	144
	Sports, Camping & Leisure Goods	10	1.40	0.66	213
	Telephones & Accessories	14	1.96	1.39	141
	Textiles & Soft Furnishings	3	0.42	0.63	67
	Toiletries, Cosmetics & Beauty Products	11	1.54	1.01	153
	Toys, Games & Hobbies	9	1.26	0.73	173
	Vehicle & Motorcycle Sales	0	0.00	0.24	0
	Vehicle Accessories	1	0.14	0.15	95
	Totals	263	36.89	29.81	124



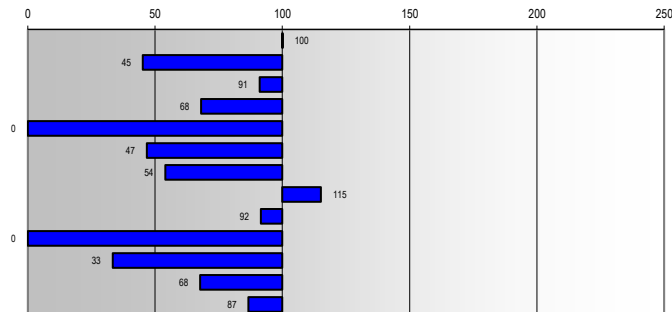
Outlet Counts

Centre:

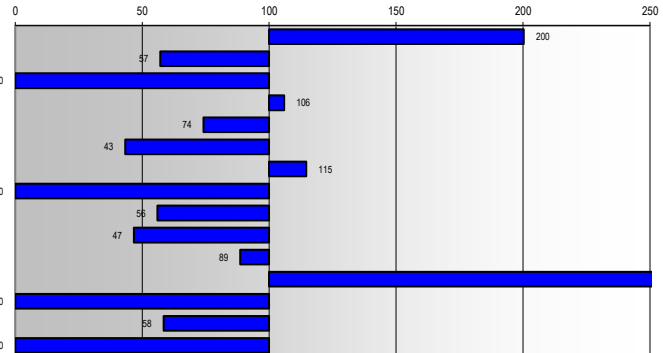
Exeter

Survey Date: 19/11/2018

Convenience	Outlets	Area %	Base %	Index
Bakers & Confectioners	13	1.82	1.82	100
Butchers	2	0.28	0.62	45
CTN	8	1.12	1.23	91
Convenience Stores	8	1.12	1.65	68
Fishmongers	0	0.00	0.11	0
Frozen Foods	1	0.14	0.30	47
Greengrocers	1	0.14	0.26	54
Grocers & Delicatessens	8	1.12	0.97	115
Health Foods	3	0.42	0.46	92
Markets	0	0.00	0.14	0
Off Licences	1	0.14	0.42	33
Shoe Repairs Etc	2	0.28	0.41	68
Supermarkets	5	0.70	0.81	87
Total Convenience	52	7.29	9.21	79



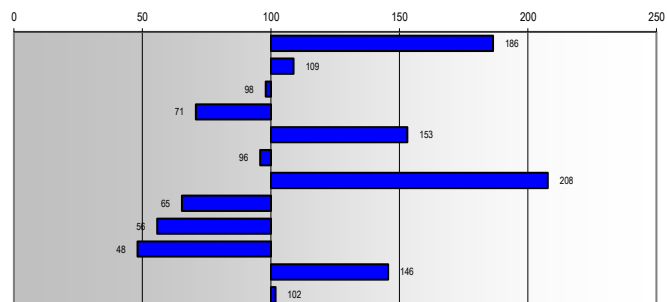
Retail Service	Outlets	Area %	Base %	Index
Clothing & Fancy Dress Hire	1	0.14	0.07	200
Dry Cleaners & Launderettes	3	0.42	0.74	57
Filling Stations	0	0.00	0.22	0
Health & Beauty	71	9.96	9.40	106
Opticians	7	0.98	1.32	74
Other Retail Services	2	0.28	0.65	43
Photo Processing	1	0.14	0.12	115
Photo Studio	0	0.00	0.14	0
Post Offices	2	0.28	0.50	56
Repairs, Alterations & Restoration	1	0.14	0.30	47
Travel Agents	5	0.70	0.79	89
TV, Cable & Video Rental	2	0.28	0.07	390
Vehicle Rental	0	0.00	0.06	0
Vehicle Repairs & Services	2	0.28	0.48	58
Video Tape Rental	0	0.00	0.01	0
Totals	97	13.60	14.87	91



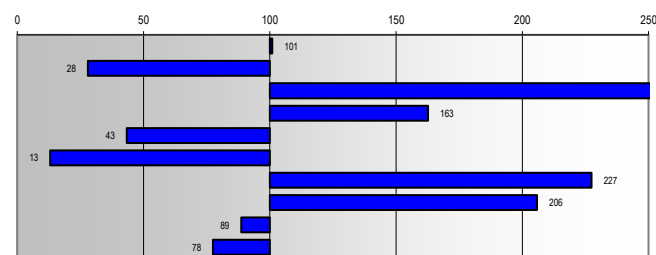
Other Retail	Outlets	Area %	Base %	Index
Other Retail Outlets	0	0.00	0.10	0



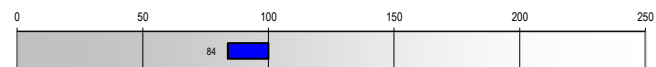
Leisure Services	Outlets	Area %	Base %	Index
Bars & Wine Bars	25	3.51	1.88	186
Bingo & Amusements	3	0.42	0.39	109
Cafes	33	4.63	4.73	98
Casinos & Betting Offices	7	0.98	1.39	71
Cinemas, Theatres & Concert Halls	3	0.42	0.27	153
Clubs	4	0.56	0.59	96
Disco, Dance & Nightclubs	3	0.42	0.20	208
Fast Food & Take Away	27	3.79	5.79	65
Hotels & Guest Houses	3	0.42	0.75	56
Public Houses	9	1.26	2.63	48
Restaurants	49	6.87	4.72	146
Sports & Leisure Facilities	7	0.98	0.96	102
Totals	173	24.26	24.30	100



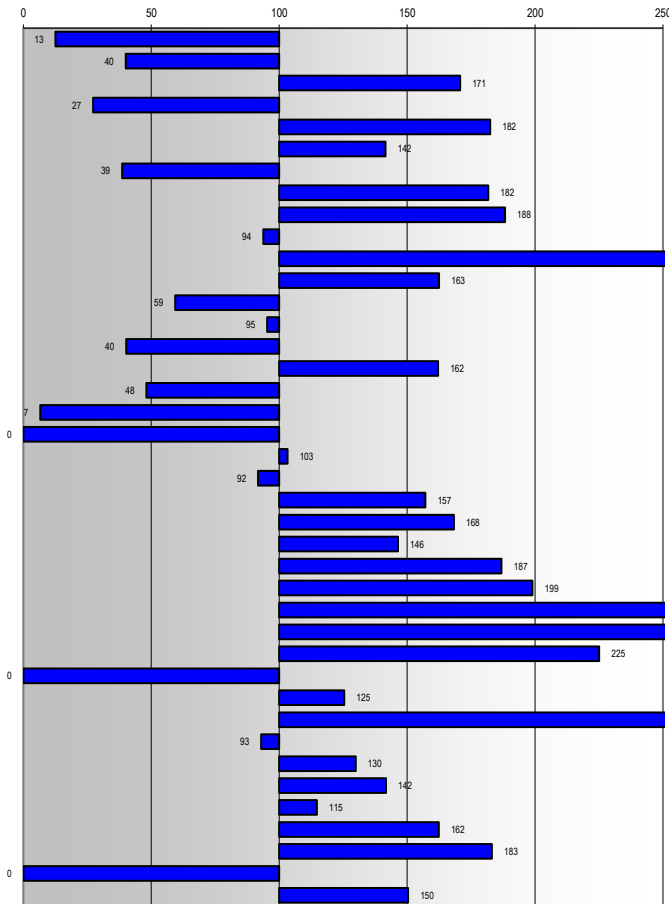
Financial & Business Services	Outlets	Area %	Base %	Index
Building Societies	3	0.42	0.42	101
Building Supplies & Services	1	0.14	0.50	28
Business Goods & Services	1	0.14	0.02	804
Employment & Careers	5	0.70	0.43	163
Financial Services	4	0.56	1.29	43
Legal Services	1	0.14	1.07	13
Other Business Services	6	0.84	0.37	227
Printing & Copying	4	0.56	0.27	206
Property Services	22	3.09	3.48	89
Retail Banks	12	1.68	2.17	78
Totals	59	8.27	10.02	83



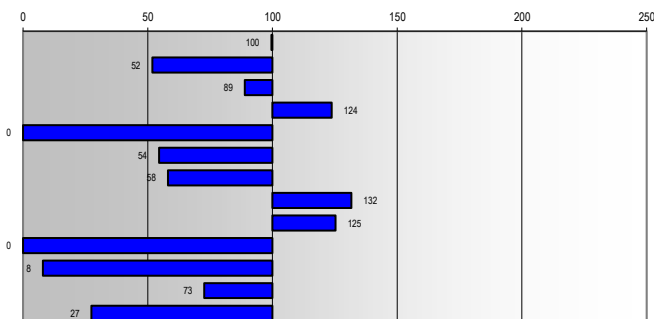
Vacant Outlets	Outlets	Area %	Base %	Index
Vacant Retail & Service Outlets	69	9.68	11.54	84
Total Number of Outlets	713			



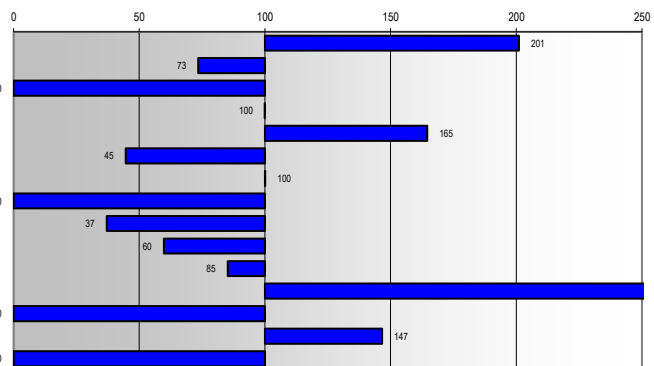
Sector	Classification	Floorspace	Area %	Base %	Index
Comparison					
	Antique Shops	400	0.03	0.21	13
	Art & Art Dealers	2,200	0.14	0.36	40
	Booksellers	11,100	0.72	0.42	171
	Carpets & Flooring	2,200	0.14	0.52	27
	Catalogue Showrooms	12,000	0.78	0.43	182
	Charity Shops	40,500	2.63	1.86	142
	Chemist & Drugstores	9,100	0.59	1.53	39
	Childrens & Infants Wear	7,600	0.49	0.27	182
	Clothing General	94,900	6.16	3.27	188
	Crafts, Gifts, China & Glass	11,800	0.77	0.82	94
	Cycles & Accessories	9,100	0.59	0.19	315
	Department & Variety Stores	122,700	7.97	4.90	163
	DIY & Home Improvement	9,500	0.62	1.04	59
	Electrical & Other Durable Goods	13,000	0.84	0.89	95
	Florists	1,400	0.09	0.23	40
	Footwear	20,300	1.32	0.81	162
	Furniture Fitted	2,700	0.18	0.36	48
	Furniture General	1,300	0.08	1.28	7
	Gardens & Equipment	0	0.00	0.06	0
	Greeting Cards	7,600	0.49	0.48	103
	Hardware & Household Goods	40,700	2.64	2.88	92
	Jewellery, Watches & Silver	17,500	1.14	0.72	157
	Ladies & Mens Wear & Acc.	59,600	3.87	2.30	168
	Ladies Wear & Accessories	34,300	2.23	1.52	146
	Leather & Travel Goods	2,200	0.14	0.08	187
	Mens Wear & Accessories	17,700	1.15	0.58	199
	Music & Musical Instruments	5,500	0.36	0.09	406
	Music & Video Recordings	6,600	0.43	0.14	296
	Newsagents & Stationers	22,700	1.47	0.65	225
	Office Supplies	0	0.00	0.02	0
	Other Comparison Goods	11,300	0.73	0.58	125
	Photographic & Optical	2,400	0.16	0.05	306
	Secondhand Goods, Books, etc.	2,200	0.14	0.15	93
	Sports, Camping & Leisure Goods	20,100	1.30	1.00	130
	Telephones & Accessories	14,700	0.95	0.67	142
	Textiles & Soft Furnishings	7,900	0.51	0.45	115
	Toiletries, Cosmetics & Beauty Products	23,500	1.53	0.94	162
	Toys, Games & Hobbies	17,600	1.14	0.62	183
	Vehicle & Motorcycle Sales	0	0.00	0.47	0
	Vehicle Accessories	4,500	0.29	0.19	150
	Totals	690,400	44.82	34.05	132



Convenience	Floorspace	Area %	Base %	Index
Bakers & Confectioners	13,600	0.88	0.89	100
Butchers	2,500	0.16	0.31	52
CTN	6,200	0.40	0.45	89
Convenience Stores	32,700	2.12	1.72	124
Fishmongers	0	0.00	0.05	0
Frozen Foods	7,100	0.46	0.85	54
Greengrocers	1,100	0.07	0.12	58
Grocers & Delicatessens	11,100	0.72	0.55	132
Health Foods	5,500	0.36	0.29	125
Markets	0	0.00	0.90	0
Off Licences	300	0.02	0.25	8
Shoe Repairs Etc	1,300	0.08	0.12	73
Supermarkets	37,500	2.43	8.87	27
Total Convenience	118,900	7.72	15.35	50



Retail Service	Floorspace	Area %	Base %	Index
Clothing & Fancy Dress Hire	1,100	0.07	0.04	201
Dry Cleaners & Launderettes	3,500	0.23	0.31	73
Filling Stations	0	0.00	0.11	0
Health & Beauty	55,200	3.58	3.59	100
Opticians	18,800	1.22	0.74	165
Other Retail Services	2,900	0.19	0.42	45
Photo Processing	700	0.05	0.05	100
Photo Studio	0	0.00	0.06	0
Post Offices	2,300	0.15	0.40	37
Repairs, Alterations & Restoration	900	0.06	0.10	60
Travel Agents	5,500	0.36	0.42	85
TV, Cable & Video Rental	1,100	0.07	0.01	572
Vehicle Rental	0	0.00	0.05	0
Vehicle Repairs & Services	14,500	0.94	0.64	147
Video Tape Rental	0	0.00	0.01	0
Totals	106,500	6.91	6.93	100



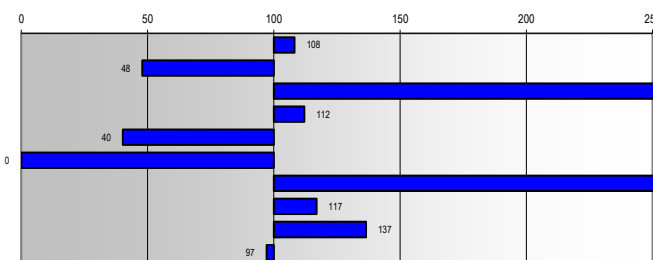
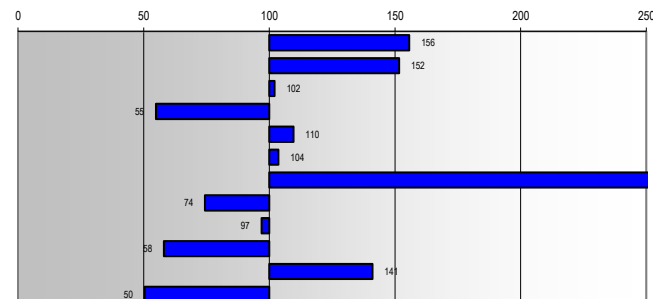
Other Retail	Floorspace	Area %	Base %	Index
Other Retail Outlets	0	0.00	0.08	0



Leisure Services	Floorspace	Area %	Base %	Index
Bars & Wine Bars	52,400	3.40	2.19	156
Bingo & Amusements	19,400	1.26	0.83	152
Cafes	41,800	2.71	2.66	102
Casinos & Betting Offices	9,200	0.60	1.09	55
Cinemas, Theatres & Concert Halls	29,700	1.93	1.76	110
Clubs	16,400	1.06	1.03	104
Disco, Dance & Nightclubs	16,400	1.06	0.39	270
Fast Food & Take Away	32,700	2.12	2.85	74
Hotels & Guest Houses	32,700	2.12	2.19	97
Public Houses	31,300	2.03	3.50	58
Restaurants	91,800	5.96	4.22	141
Sports & Leisure Facilities	20,500	1.33	2.64	50
Totals	394,300	25.60	25.35	101

Financial & Business Services	Floorspace	Area %	Base %	Index
Building Societies	5,300	0.34	0.32	108
Building Supplies & Services	3,200	0.21	0.43	48
Business Goods & Services	800	0.05	0.01	391
Employment & Careers	4,200	0.27	0.24	112
Financial Services	4,500	0.29	0.73	40
Legal Services	0	0.00	0.77	0
Other Business Services	23,700	1.54	0.42	369
Printing & Copying	2,700	0.18	0.15	117
Property Services	38,400	2.49	1.83	137
Retail Banks	38,600	2.51	2.58	97
Totals	121,400	7.88	7.48	105

Vacant Outlets	Floorspace	Area %	Base %	Index
Vacant Retail & Service Outlets	108,900	7.07	10.20	69
Total Floorspace	1,540,400			



TERMS AND CONDITIONS

1. DEFINITIONS

"this agreement" means the terms and conditions hereunder and the correspondence between the parties attached hereto.

"Experian" means Experian Group Limited.

"the Client" means the person, firm or limited company to whom the Services are to be provided.

"the Information" means any information (in whatsoever form) provided to the Client by Experian in connection with the Services.

"the Media" means the records, tapes or other materials and documents by which the information is communicated to the Client.

"the Services" means the services to be provided by Experian to the Client more particularly described in the correspondence between the parties attached hereto.

2. CONTRACT TERMS

Subject to Clause 14 hereunder this Agreement shall be on the terms and conditions set out below to the exclusion of any other terms and conditions whether or not the same are endorsed upon, delivered with or referred to in any document delivered or sent by the client to Experian.

3. PAYMENT OF CHARGES

3.1 The charges for the Services ("the Charges") shall be specified by Experian to the Client.

3.2 The Client shall pay the Charges within 28 days of the date of Experian's invoice thereof.

3.3 Interest at an annual rate of 5% above Barclays Bank plc's base rate from time to time shall accrue daily and be calculated on a daily basis on any sum overdue from the date of invoice until payment in full of the Charges.

3.4 Unless expressly stated otherwise the Charges shall be exclusive of VAT (or any other duty chargeable in respect thereof) (which for the avoidance of doubt shall be payable by the Client in accordance with the terms and conditions hereof).

4. PROVISION OF THE SERVICES

4.1 Experian shall use all reasonable endeavours to ensure that the information is accurate in all material respects.

4.2 Save as provided in sub-clause 4.1 above or otherwise expressly provided in this Agreement or to the extent that it is unlawful for any said representations and warranties to be excluded Experian makes no representations or warranties whether express or implied (by statute or otherwise) in connection with the Services or use thereof by the Client or otherwise in connection with this Agreement.

4.3 The parties hereto agree that the time for the performance of Experian's obligations in connection with the Services shall not be of the essence in this Agreement.

5. LIMITATION OF LIABILITY

Notwithstanding anything to the contrary contained in this Agreement:

5.1 Experian shall not be liable (whether in contract or in negligence (other than the liability in respect of death or personal injury arising out of the negligence of Experian its servants or agents) or other tort or otherwise) for any indirect or consequential loss of any kind whatsoever (including without limitation loss of profit or loss of business) suffered by the Client in connection with the Services.

5.2 Without prejudice to the provisions of sub-clause 4.1 above Experian's maximum aggregate liability hereunder (other than liability in respect of death or personal injury arising out of the negligence of Experian its servants or agents) whether for breach of this Agreement or otherwise and whether or not arising from the negligence of Experian or any other person involved directly or indirectly in the provision of the Services shall not exceed an amount equal to the Charges (exclusive of VAT) payable to Experian hereunder.

6. COPYRIGHT

Property and the copyright (and all other intellectual property rights) in the Media and the Information (other than any information which has passed to Experian by the Client in connection with the Services or which has been obtained from any third party by Experian which copyright and all other intellectual property rights as appropriate shall remain vested in such third party) shall at all times remain vested in Experian.

7. CONFIDENTIALITY

7.1 The Client undertakes that it shall use the Information solely for the purpose of its own business and shall not (without the prior written consent of Experian) copy reproduce publish or transmit any part of the Information in any manner whatsoever and the media shall be returned to Experian upon demand.

7.2 The Client undertakes with Experian that the Client shall permit access to the Information only to those of its authorised officers or employees who need to know or use the Information and that the Client shall procure that its offices and employees shall maintain in strictest confidence and not divulge communicate or permit access to any third party any confidential information relating to Experian.

7.3 For the purpose of sub-clause 7.2 hereof the expression "confidential information" shall mean (as the context may require)

7.3.1 the Information; and/or

7.3.2 any information concerning Experian's trade secrets or business dealings

transactions or affairs which may come to the notice of the client; and/or

7.3.3 any information and/or know how relating to the methods or techniques used

by Experian in devising and developing the Services and any tapes documents or

other materials comprising any part of such information and/or know how made

available by Experian hereunder.

7.4 The provisions of sub-clause 7.2 hereof shall not apply to any confidential

information to the extent that:

7.4.1 the Client is required to divulge the same by a Court tribunal or government

authority with competent jurisdiction

7.4.2 it has already come within the public domain

7.4.3 it was already known to the Client prior to the date of disclosure by Experian

(as evidence by written records)

8. INDEMNITY

The Client shall indemnify and keep indemnified Experian from and against any and all liability loss claims demands costs or expenses of any kind whatsoever which shall at any time suffer or incur and which arise out of or in connection with the services provided that this indemnity shall not apply to the extent that any such liability arises of the default of Experian.

9. DATA PROTECTION ACT 1984

The Client undertakes that at all times they shall comply fully with the provisions of the Data Protection Act 1984 and any subsequent amendments thereto or re-enactments thereof.

10. TERMINATION

10.1 Experian shall be entitled to terminate this Agreement immediately by written notice to the Client if:

10.1.1 The Client is guilty of any material breach of the provisions of this Agreement and such breach if capable of remedy is not remedied within twenty one working days of written notice having been given to remedy such breach.

10.1.2 The Client has had a bankruptcy order made against it or has made an arrangement or composition with its creditors or (being a body corporate) has had convened a meeting of creditors (whether formal or informal) or has entered into liquidation (whether voluntary or compulsory) except a solvent voluntary liquidation for the purpose only of reconstruction or amalgamation or has a receiver manager administrator or administrative receiver appointed of its undertaking or any part thereof or a resolution has been passed or a petition presented to any Court for the winding-up of the Client or for the granting of an administration order in respect of the Client or any proceedings have been commenced relating to the insolvency of the Client.

10.2 The termination of this Agreement shall be without prejudice to the rights of Experian accrued prior to such termination.

11. FORCE MAJEURE

Notwithstanding anything herein contained neither party shall be under any liability to the other in respect of any failure to perform or delay in performing any of the obligations hereunder which is due to any cause of whatsoever nature beyond its reasonable control and no such failure or delay shall be deemed for any purposes to be a breach of this Agreement.

12. ASSIGNMENT

The rights granted to the Client hereunder are personal to it and the Client shall not assign or grant any rights in respect of or otherwise deal in the same.

13. WAIVER

Failure by either party to enforce any of the provisions of this Agreement shall not operate as a waiver of any of its rights hereunder or operate so as to bar the exercise or enforcement thereof at any time or times.

14. VARIATIONS

This Agreement constitutes the whole of the terms agreed between the parties hereto in respect of the subject matter hereof and supersedes all previous negotiations, understandings or representations and shall be capable of being varied only by an instrument in writing signed by a duly authorised representative of each of the parties hereto.

15. NOTICE

Any notice to be given hereunder by either party to the other may be given by first class mail addressed to the party of the address herein specified or such other address as such party may from time to time nominate for the purpose hereof or by telex or telefax and shall be deemed to have been served.

15.1 if given by mail seventy-two hours after the same shall have been despatched and

15.2 if given by telex or telefax one hour after transmission (if transmitted during normal business hours) and twelve hours after transmission (if transmitted outside normal business hours).

16. SEVERANCE

This Agreement is severable in that if any provision hereof is determined to be illegal or unenforceable by any Court or competent jurisdiction such provision shall be deemed to have been deleted without affecting the remaining provisions of this Agreement.

17. LAW

This Agreement shall be governed by and construed in accordance with English Law and the parties hereto agree that the English Courts shall have exclusive jurisdiction.

Appendix C – Hotel Snapshot Report

A snapshot of the Exeter hotel market is shown in the table below.

Market Snapshot Report - Exeter

Currency: British Pounds
March 2019



HOTEL SUPPLY							
	Market Size and Structure				Rooms by Brand Type		
	Hotels	% Share	Rooms	% Share	Ave Rooms	% Brand	% Independent
Apartments	4	12.1	24	1.5	6	0.7	0.8
Luxury Class	0	0	0	0	0	0	0
Upper Upscale Class	2	6.1	69	4.2	35	3.6	0.6
Upscale Class	3	9.1	39	2.4	13	0	2.4
Upper Midscale Class	14	42.4	784	48.1	56	42.1	5.9
Midscale Class	8	24.2	209	12.8	26	4.3	8.5
Economy Class	6	18.2	530	32.5	88	32.5	0
Total	33	100.0	1,631	100.0	49	82.5	17.5

Room Supply by Type													
Apartments	1.5%	Luxury Class	0.0%	Upper Upscale Class	4.2%	Upscale Class	2.4%	Upper Midscale Class	48.1%	Midscale Class	12.8%	Econom Class	32.5%

NEW HOTEL OPENINGS												
	Supply Growth - New Hotel Openings (Hotels)					Supply Growth - New Hotel Openings (Rooms)						
	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015-2019	2015-2019 (%)
Apartments	0	0	0	0	0	0	0	0	0	0	0	0
Luxury Class	0	0	0	0	0	0	0	0	0	0	0	0
Upper Upscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Upscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Upper Midscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Midscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Economy Class	0	1	0	0	0	1	0	120	0	0	120	100.0
Total	0	1	0	0	0	1	0	120	0	0	120	100.0

Rooms Added by New Hotel Openings				
2015	2016	2017	2018	2019
0	120	0	0	0

PROJECT PIPELINE							
	Market Size and Structure				Rooms by Brand Type		
	Projects	% Share	Rooms	% Share	Ave Rooms	% Brand	% Independent
Apartments	0	0	0	0	0	0	0
Luxury Class	0	0	0	0	0	0	0
Upper Upscale Class	0	0	0	0	0	0	0
Upscale Class	2	25.0	271	40.6	136	37.4	3.1
Upper Midscale Class	3	37.5	119	17.8	40	15.4	2.4
Midscale Class	1	12.5	175	26.2	175	0	26.2
Economy Class	2	25.0	103	15.4	52	0.1	15.3
Total	8	100.0	668	100.0	84	53.0	47.0
Due 2019	1	12.5	103	15.4	103	15.4	0
Due 2020	0	0	0	0	0	0	0
Due 2021	0	0	0	0	0	0	0
On Hold	0	0	0	0	0	0	0
Unconfirmed/Speculative	7	87.5	565	84.6	81	37.6	47.0
Total	8	100.0	668	100.0	84	53.0	47.0

Room Pipeline by Date		
Due 2019	Due 2020	Due 2021
103	0	0

Room Pipeline by Status	
Confirm	On Hold
103	565

HOTEL CLOSURES												
	Supply Loss - Hotel Closures (Hotels)					Supply Loss - Hotel Closures (Rooms)						
	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019	2015-2019	2015-2019 (%)
Apartments	0	0	0	0	0	0	0	0	0	0	0	0
Luxury Class	0	0	0	0	0	0	0	0	0	0	0	0
Upper Upscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Upscale Class	1	1	0	0	2	10	53	0	0	0	63	65.6
Upper Midscale Class	0	0	0	0	0	0	0	0	0	0	0	0
Midscale Class	1	1	0	0	2	23	10	0	0	0	33	34.4
Economy Class	0	0	0	0	0	0	0	0	0	0	0	0
Total	2	2	0	0	0	33	63	0	0	0	96	100.0

Rooms Lost by Hotel Closures				
2015	2016	2017	2018	2019
33	63	0	0	0

Rooms Added by New Hotel Openings

Year	Rooms Added
2015	0
2016	120
2017	0
2018	0
2019	0

Room Pipeline by Date

Due Date	Rooms
Due 2019	103
Due 2020	0
Due 2021	0

Room Pipeline by Status

Status	Rooms
Confirm	103
On Hold	0
Total	565

Rooms Lost by Hotel Closures

Year	Rooms Lost
2015	33
2016	63
2017	0
2018	0
2019	0

Exeter continues to perform strongly on the national stage and the performance of hotels exceeding 20 bedrooms is as follows.

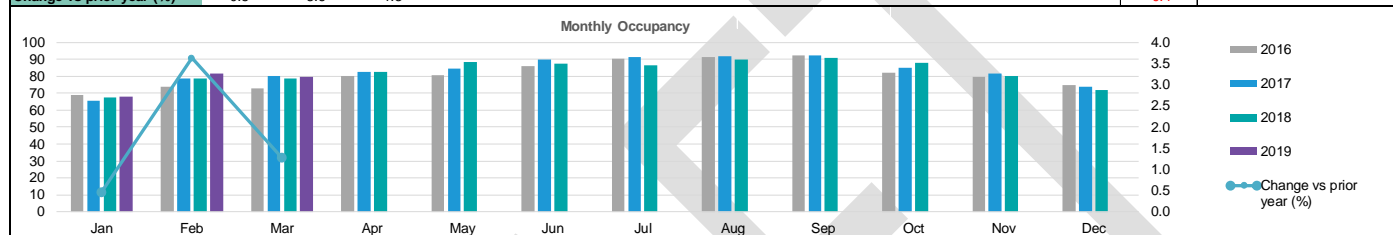
Market Snapshot Report - Exeter

Currency: British Pounds
March 2019

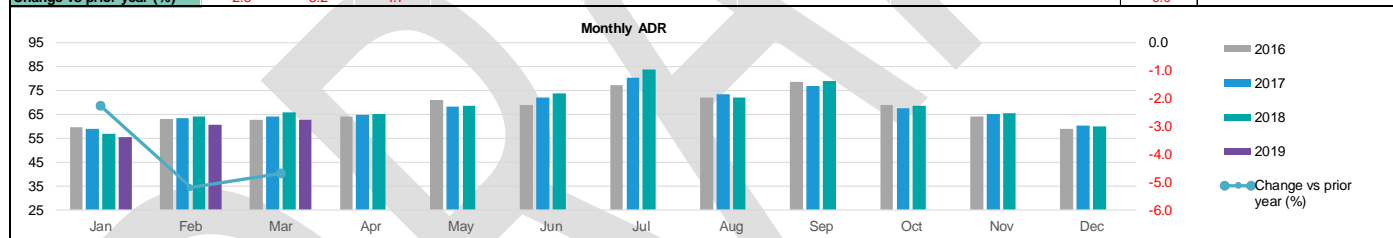


Market Performance

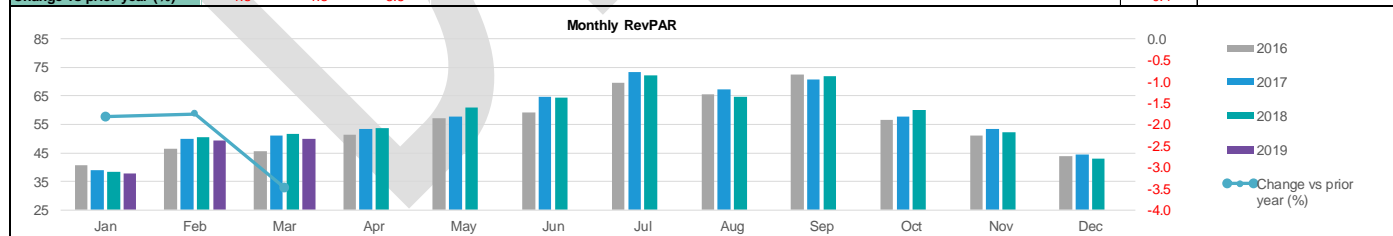
Occupancy (%)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	LTM (%)	
2016	68.7	73.9	72.8	80.4	80.8	85.8	90.4	91.2	92.1	82.0	79.8	74.7	81.1	
2017	65.8	78.6	80.0	82.6	84.7	89.9	91.6	91.7	92.2	85.2	81.8	73.9	83.2	
2018	67.7	78.9	78.5	82.5	88.6	87.5	86.6	89.8	90.9	87.8	80.0	71.8	82.6	
2019	68.0	81.8	79.5										82.9	
Change vs prior year (%)	0.5	3.6	1.3										-0.4	



Average Daily Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	LTM	
2016	59.39	62.89	62.57	63.91	70.76	68.94	77.12	71.99	78.62	68.82	64.11	58.79	67.89	
2017	59.02	63.39	63.87	64.69	68.05	72.00	80.13	73.25	76.77	67.60	65.17	60.28	68.42	
2018	56.86	63.85	65.77	65.00	68.60	73.67	83.50	72.06	78.96	68.43	65.29	59.91	69.01	
2019	55.56	60.53	62.69										68.40	
Change vs prior year (%)	-2.3	-5.2	-4.7										-0.0	



RevPAR	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	LTM	
2016	40.82	46.49	45.55	51.37	57.19	59.14	69.70	65.65	72.43	56.45	51.13	43.90	55.06	
2017	38.83	49.83	51.13	53.43	57.66	64.73	73.36	67.20	70.81	57.60	53.28	44.56	56.94	
2018	38.51	50.38	51.65	53.62	60.81	64.49	72.30	64.74	71.78	60.06	52.23	43.01	56.98	
2019	37.81	49.49	49.85										56.70	
Change vs prior year (%)	-1.8	-1.8	-3.5										-0.4	





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