



Historic England

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Direct Dial: 0117 975 0725

Our ref: P01545973

24 March 2023

Dear Mr Smith

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**HAVEN BANKS, WATER LANE, EX2 8BY  
Application No. 22/1145**

Thank you for your letter of 20 February 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Additional information has been submitted in respect of the proposed development at Haven Banks, which includes verified views and photomontages. The additional information has raised a number of issues following on from our previous response (dated 29 September 2022) associated with the potential impact of the proposed development on the surrounding historic environment. We would like to offer the following advice to ensure that the new development makes a positive contribution to local character and distinctiveness, particularly in respect of the Riverside Conservation Area, in particular around the Canal Basin and Quayside as well as the impact on the grade II\* listed Colleton Crescent. We consider that there are opportunities within the proposed development that through amendments could better address the historic environment and ensure that the development delivers a sustainable scheme in line with Para 8, NPPF.

**Significance**

Haven Bank sits to the south of the historic city of Exeter. Exeter's elevated position and its proximity to the lowest bridgeable crossing of the River Exe made it an important strategic location within the region historically.

The city has had a port from the 16<sup>th</sup> century, extending into the marshland areas that



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formed the southern bank in the 17<sup>th</sup> and 18<sup>th</sup> century. Although, it saw a decline in the 19<sup>th</sup> century with the arrival of the train, it underwent a period of regeneration in the late 20<sup>th</sup> and early 21<sup>st</sup> century for residential and recreational uses.

The development site is immediately adjacent to Area 1 - The Quay, Canal Basin, Malthouse and Cricklepit, a character area within the Riverside Conservation Area. The Basin is recognised as being of great historical importance containing warehouses and the former Electricity Generating building. Some modern development has occurred with varying degrees of success. The conservation appraisal highlights the need for new structures to enhance the important spaces and buildings.

The land above the quay was developed in the early 19<sup>th</sup> century for formal residential accommodation. Of particular note is Colleton Crescent which is a prominent feature on the high ground. The regency terrace is designed in a gentle arch set behind a formal lawn. The lawn allows for expansive views out from the terrace across the basin to the rural hinterland of Exeter and as far as Dartmoor. This borrowed view articulates the rationale for the development of the building in this location and is an integral part of the experience and consequently, the significance it derives from its setting.

## Impact

Historic England is not averse to the principle of the redevelopment of the site, which allows for significant opportunities for enhancement.

The main issue relates to the scale and mass of Block C. This is within views from the Basin and Quay side as well as in elevated views from Colleton Crescent.

In respect of the impact on the Quay and around the Canal Basin, the scale of Block C will conflict with the current character and appearance of the conservation area due to its increase in scale and height. It will introduce a conspicuous addition to the skyline, that could appear overbearing. This is particularly noticeable as it will dominate the former Electricity Generating building which is a striking building in its own right.

Furthermore, in respect of Colleton Crescent, the proposal would introduce a notable feature that breaks the current silhouette of development within the area, disrupting views through to Dartmoor, a key aspect of the experience of this part of the site.

## Policy

The NPPF identifies the need for opportunities to be sought for new development to reflect the local character and distinctiveness of the area as well as to enhance or better reveal the significance of Conservation Areas and that derived from the setting of heritage assets (NPPF, Para 197(c) and 206).



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Meanwhile Chapter 12 highlights the importance of well-designed places. In particular para 130 refers to the need for a site to be sympathetic to local character and history, including the surrounding built environment, be good architecture and maintain a strong sense of space as seen along the quay.

Where there is a conflict between the heritage asset and the proposed development, opportunities should be sought to avoid and minimise harm. This will assist in demonstrating that opportunities have been taken to identify sustainable development that balances the objectives of the NPPF.

### **Historic England's Position**

Consequently, Historic England has concerns regarding the scale and mass of Block C, which is evident through the verified images and photomontages. In our view these concerns would be best address through the removal of the uppermost floor, known as the 5<sup>th</sup> floor, of Block C. This would bring the development more in line with the existing silhouette of the current conservation area and modern development, retaining the views from within the Quay and Canal Basin as well as from Colleton Crescent (NPPF, Para 195). Consideration could also be given to creating a finer grain to the development as well as architecture that better responds to the character and appearance of the conservation area (NPPF, Para 130).

By undertaking the modest amendments as set out in this letter, the scheme would be better able to demonstrate that it meets the requirements of Para 8, NPPF, advocating a more considered balance of the overarching objectives and therefore delivering a sustainable development.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds.

These concerns related to the scale of Block C and its impact on the character and appearance of the Riverside Conservation Area as well as on the significance Colleton Crescent derives from its setting. Amendments to the proposal could assist in delivering a more sustainable development in line with the requirements of the NPPF (Para 8).

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 8, 130, 197(c), 195 and 206 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have



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special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Also section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

**Rhiannon Rhys**

Inspector of Historic Buildings and Areas

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