

## *Planning Statement*

### The Harlequins Centre, Paul Street, Exeter, EX4 3TT AMENDED SCHEME SUBMISSION



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# 1 Introduction

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- 1.1 This Planning Statement has been prepared by JLL on behalf of the client, Curlew Alternatives Property LP. It accompanies amended material submitted to Exeter City Council in regard of application 19/1556/FUL.
- 1.2 The application was initially submitted to the council on the 7<sup>th</sup> November 2019 and proposed the demolition of the existing Harlequins Shopping Centre and a connected pedestrian footbridge, followed by redevelopment of the site for two blocks of accommodation, the first for Co-Living (including a total of 278 beds) and the second for a mix of Co-Living (21 beds) and a hotel (114 bedrooms).
- 1.3 The preparation of the proposals included a public consultation exercise in summer 2019, which resulted in changes to the scheme including the reduction in the height of the buildings and the change from the original proposed student accommodation, to the new Co-Living model of accommodation.
- 1.4 Following the submission of the application, there has been further public comments on the proposals, plus responses from statutory consultees. These comments have been considered by the project team and as a result it has been agreed to amend the scheme further.
- 1.5 This statement accompanies the amended set of application drawings, along with a full suite of documents which update and/or amend the reports submitted with the original application. A full list of the accompanying documents is included in Appendix A.
- 1.6 In summary, the amended scheme has:
  - Reduced the overall height of both proposed buildings, by the removal of the top floors of the highest part of each building
  - Reduced the amount of co-living accommodation to a total of 259 bedspaces, all in Block 1
  - Removed co-living accommodation from Block 2, increasing the number of hotel rooms to 128 in total
  - Remodelled the façade of both buildings, to increase the variety in both
  - Revised details of windows and removed glazing completely in order to reduce any perception of overlooking
  - Revised the material proposed for the top floor of both buildings, removing the previously proposed glazing
  - Revised the fabric of the Co-Living building (Block 1), notably the amount of glazing, to reflect Passivhaus Principles
  - Building 2, the hotel, continues to achieve BREEAM Excellent
  - Added a new Green Wall to one elevation of the hotel building
  - Confirmed that tenancies for Co-Living residents will be a minimum of 3 months
  - Identified the Co-Living Accommodation Manager as having the role of community co-ordinator
  - Introduced a replacement pedestrian bridge from Paul Street to the Guildhall Centre.
- 1.7 These changes are discussed further in this document and have been made in order to address the main concerns expressed by parties during the consultation phase of the application.

- 1.8 As a result of these changes it is necessary for the application to be re-advertised so that interested parties and statutory consultees are able to comment on the amended plans. The application site (the red line) is unchanged but the Description of Development of the application will now need to be amended to reflect the revised scheme. The suggested amended wording is

*Development of a Co-Living (Sui Generis) accommodation block and a hotel (Class C1) including bar and restaurant, following demolition of existing shopping centre and pedestrian bridge, change of use of upper floors of 21-22 Queen Street to Co-Living (Sui Generis), and all associated works including parking, landscaping, amenity areas, public realm improvements, new pedestrian bridge and provision of heritage interpretation kiosk. (Revised)*

### Structure of Statement

- 1.9 This planning statement is presented in support of the application and draws on the documents submitted with these amended plans, which are listed fully at Appendix A.
- 1.10 The structure of this report follows that of the Planning Statement submitted with the original application. The original statement included a site description, which has not changed since that time. Also, it provided a full review of the planning policy background and planning history for the site. This also has not changed in the period since and, therefore, has not been updated for this report

### Walnut Gardens Appeal Decisions

- 1.11 The original planning statement included a summary of the planning history for the site itself and within the assessment of the scheme impacts referred to an application for Beech Hill House, Walnut Gardens, St. David's Hill which had recently been refused at the time of submission in November. The application referred to in the planning statement was a second application for the Walnut Gardens site, the first application was also refused by the Council, so both were considered at an appeal hearing held in November 2019. The Inspectors decision on both appeals was issued on 19<sup>th</sup> December 2019. (Appeal A Ref: APP/Y1110/W/19/3227714 and Appeal B Ref APP/Y1110/W/19/3238758)
- 1.12 The proposals for Beech Hill House were both for student accommodation and had significant parallels with the proposals for the Harlequins Centre:
- The site is located within the St David's Conservation Area
  - It was agreed that the proposals impacted on listed buildings notably the settings of the Grade II Walnut House and Grade I Church of St David, plus the city's cathedral
  - The key issues were the scale of the building and the impact on heritage and neighbours
  - In both instances the loss of the existing use has not been contended, but it is the impacts of the proposed use that are of particular relevance to this application.
- 1.13 The Inspector concluded that the appeal for the first application, for 192 bedspaces in total, be dismissed but the appeal for the second, for a total of 166 bedspaces should be allowed. The inspector's decision letter provided a number of points and comments which are, because the schemes are so similar, relevant to the consideration of the Harlequins Centre application.
- 1.14 At the outset the Inspector confirmed that the council has only a 2 year 1 month housing land supply and it was agreed by all parties that any local housing assessment should take into account the needs of

students. In his assessment of the appeal the Inspector therefore concluded that the policies for the supply of housing are out-of-date (Para 14) and as such this remains true for the consideration of this application as this situation is materially unchanged.

- 1.15 The Inspector then summarised that the main issues as “*whether the public benefits of the proposals would outweigh any harm to the heritage interest (significance) of various designated and non-designated heritage assets and, if so, whether any adverse impacts of the proposals, having particular regard to: the likely effect upon the living conditions of the occupiers of Nos. 55-61 St. David’s Hill and; any imbalance in the local community, would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework (the Framework) taken as a whole*” (Para12).
- 1.16 As is discussed in further detail in this statement, these issues reflect clearly those in the consideration of the Harlequins Centre application and the conclusions of the Inspector are therefore considered to be relevant to the consideration of this application.
- 1.17 The inspector set out the benefits of the Walnut Gardens schemes as:
- The site would increase the supply of PBSA in the city in a location that is conveniently located with respect to the University and main services and facilities, including public transport.
  - The proposals would entail the more efficient use of previously developed urban land for housing and would accord with the thrust of the Government’s objective of boosting significantly the supply of housing
  - The delivery of accommodation would have the potential to reduce the pressure on the existing housing stock and to release some houses in multiple occupation (HMO) by students for use by families
  - Development would provide economic benefits in terms of support for the construction industry, assisting in the expansion of the University and the increased spend on services and facilities by students.
  - The use of solar panels on the roofs of the new buildings would assist in helping to tackle climate change
  - The drainage strategy indicates that, subject to a reduction in run-off rates from the site, the risk of flooding elsewhere could be reduced
- 1.18 The Inspector therefore concluded that “*In both schemes these benefits would be substantial and can be given considerable weight*” (Para 21). Broadly these benefits also apply to the Harlequins Centre proposals, as the site is located within the city centre, well located for services and facilities, reuses previously development land and will boost the supply of housing, will result in investment in the city and support the local economy, will achieve a high degree of sustainability and minimises run off. Therefore, considerable weight should be given to these benefits in the decision making.
- 1.19 There was disagreement during the appeal between parties about the extent to which PBSA can help to address the shortfall in housing land supply in the city. The inspector concluded that the construction of student accommodation had released houses previously used as HMOs for family housing and therefore “to a very small extent” the PBSA would help the position. He concluded that this would carry “limited weight” in the planning balance but the decision did not turn on this particular matter. The application for the Harlequins Centre originally proposed student housing but has been changed to Co-living which will also attract those who otherwise might live in HMOs. Therefore, this benefit will arise from the Co-Living scheme.

- 1.20 The Walnut Gardens proposals focused on the demolition of a relatively modern building, set within the wider historic context of the Conservation Area and listed buildings, which can be viewed from distance as well as within the close vicinity of the site itself. Therefore, consideration was given by the inspector to both the impact on heritage assets immediately adjacent to the site, and also to impacts on wider heritage assets, churches and the city's cathedral which are included in wider views.
- 1.21 The redevelopment of the site, in principle, for PBSA was confirmed to be acceptable by the LPA and the proposed PBSA buildings, in both appeals, were larger than the existing building. These are characteristics which are similar to those of the Harlequins Centre.
- 1.22 The proposals for the Walnut Gardens site did require the removal of 4 trees of Category A and B, along with a number of less valued specimens. There was though, similar to the proposals for the Harlequins Centre, a net gain in trees as a result of the proposals.
- 1.23 In regard of Appeal A, the inspector considered that the scale of the building would “*stand out as a discordant addition in some views into the CA. Great weight must be given to the conservation of designated heritage assets. This harm weighs heavily against granting permission*”. (Para 46).
- 1.24 Whereas, the inspector concluded for Appeal B “*the lower height and reduced mass of the proposed building (in comparison to the appeal A scheme) would not significantly interrupt the tree line. This new building would result in negligible or, at worst, very limited disruption to the tree-lined edge of the CA and minor harm to its significance*” (para 47).
- 1.25 In conclusion on the matter of heritage impact, the Inspector concluded that “*Neither scheme would harm the significance of any listed (including locally listed) buildings and their settings would be preserved*”(Para 50)
- 1.26 In both appeals the inspector concluded that there would “*be less than substantial harm to the significance and character and appearance of the CA*”. However, the proposals in Appeal A would conflict with the policies of the Core Strategy and that harm would not be outweighed by the public benefits of the proposal. Whilst the harm to the significance and character of the conservation area would be outweighed by those same (though slightly lesser due to the reduced number of rooms) public benefits associated with Appeal B.
- 1.27 This provides clear parallels for the Harlequins Centre scheme, where the heritage impact of proposals has been closely considered in the submitted heritage assessments and the harm adjudged to be less than substantial. Therefore, it is for the Council, as the inspector did in the appeal, to weigh the public benefits of the scheme against this harm.
- 1.28 In the case of Walnut Gardens, the Inspector considered carefully the living conditions of neighbours and the potential for overlooking of existing and proposed rooms. The inspector stated that “*the LPA informed me that it operated a minimum ‘21 metre rule’ for the separation between facing windows to habitable rooms. It also informed me that this had been relaxed in some situations to ensure the more efficient use of previously-developed urban land for housing*”. (para 53)
- 1.29 The inspector also noted that there is already some degree of overlooking apparent from existing buildings, which is a situation similar to that for the Harlequins centre, where the existing building overlooks the rear of properties on Northernhay.

- 1.30 For the Walnut Gardens appeal schemes there are instances where the propose scheme would breach that 21 metre rule, but the inspector concluded in these instances *this is unlikely to give rise to any serious overlooking of this neighbouring terrace or any significant loss of privacy (Para 54)*. The inspector therefore conceded that the 21 m “rule” applied by the council is not a distance to be strictly applied in all cases. However, in the proposals for the Harlequins Centre the 21 metre rule has been taken into account and where there was the potential for this to occur measures (such as frosting glazing and angling windows) have been introduced to avoid it.
- 1.31 Concerns were also expressed about the potential for the new buildings at Walnut Gardens to overshadow neighbours and this was considered during the appeal, for both schemes. The inspector did note the large wall which already sits on the boundary has an impact on light and outlook from the adjacent dwellings, which is the case for Harlequins Centre with the city wall forming the boundary between the site and neighbours.
- 1.32 Shadow analysis was submitted with the original Harlequins application which demonstrated the limited changes made by the proposals from the existing situation. This analysis has been amended to reflect the revised scheme and is included within an additional chapter of the Design & Access Statement. In addition, with this resubmission, a Daylight Sunlight analysis has been produced which calculates the impact on all windows of the proposed scheme based on the BRE Guide. This clearly demonstrates that over 95% of windows still comply with BRE guidance levels after development, and the findings are discussed further in Section 4 of this report.
- 1.33 The implication for noise nuisances arising from student residents was also considered by the Inspector. He did point to the existing use (the fallback position) and noted that activity within that site might already or in the future cause some level of impact, which is the position for the Harlequins Centre where the service yard to the rear of the shopping centre provided a potential source of noise nuisance for adjacent residents. The inspector concluded that the Walnut Gardens scheme would be subject to a management plan which would control the behaviour of residents and minimise any anti-social behaviour, and this is the same for the Harlequins Centre proposals.
- 1.34 The final element which was considered by the inspector related to “Community Imbalance” which is broadly the concern that there becomes an excessive number of a particular group, in this case students, within an area, which impacts on the wider community. This was a concern in the preparation of the Harlequins Centre proposals and one of the reasons why part of the scheme was changed following pre-application consultation from PBSA to a Co-Living use. This use is discussed in the material submitted with the application but in short aims to provide for those who might normally expect to occupy HMOs, notably young professionals.
- 1.35 In the consideration of the Walnut Gardens Appeals, the inspector concluded that there was no evidence to substantiate the concerns over community imbalance nor that the use would result in an over concentration of student accommodation or harm the local character of the area. However, it is accepted that there are local concerns about the concentration of student accommodation and the applicant is now proposing to deliver a Co-Living scheme to the Harlequins Site.
- 1.36 In concluding the appeals, the inspector confirmed that the public benefits in the case of Appeal A would not outweigh the less than substantial harm to heritage assets, and that the potential impact on living conditions was added to this case and the appeal dismissed.



- 1.37 On Appeal B, the limited harm to the significance of the heritage assets and the living conditions of neighbours would not outweigh the substantial benefits of the development. Therefore, the Appeal was allowed subject to conditions.
- 1.38 In discussing these conditions, the Inspector noted (para 84) that the Council's policy CP15, which requires delivery of BREEAM Excellent applied to an old version of the standard, which has now been updated. However, the policy applies to the standard at the time it was adopted, so the policy requirement actually requires the delivery of BREEAM at the time of adoption, which now equates to Very Good. This is the condition which the inspector applied to the permission.
- 1.39 At Harlequins Centre the Hotel building is to be delivered to the BREEAM Excellent standard, which is better than the Very Good. The Co-living building was originally designed to the same standard, but it is now decided that it will adopt Passivhaus Principles, in line with best practice locally to seek to minimise long term energy requirements and broadly in excess of BREEAM Excellent for the building fabric.
- 1.40 Finally, the inspector acknowledged that there was significant local opposition to Appeal B, but he did note that "*local opposition to a proposal is not by itself sufficient grounds for withholding planning permission.*" and that "*The development .... strikes the appropriate balance between accommodating growth within the city and safeguarding the quality of the local environment, including the living conditions of neighbouring residents*" (Par 86).
- 1.41 It is exactly this balance that the proposals at Harlequins Centre seek to achieve and the continued evolution of the scheme through these amended plans restates the point that the applicants are willing to listen to the local community and officers of the council in achieving a scheme which balances the benefits of a significant investment in a vacant brownfield site in the city centre for a vibrant and productive mix of uses, bringing additional life and investment into the city, whilst respecting the heritage of the area and the interests of neighbours.

### The report structure

- 1.42 The following sections set out the comments which have been received from all parties during the consideration of the application, confirm the amendments to the scheme which are proposed and provides an analysis of how the scheme will meet with the various policy tests applied by the council and notably how the less than substantial harm of the proposals on the heritage assets of the locality and the wider city are balanced against the substantial benefits of the proposed development.
- 1.43 This report is structured as follows:
- Section 2 – summarises the comments received to date for the application
  - Section 3 – sets out the amended proposals and the way they address the concerns raised
  - Section 4 – considers the amended proposals against the council's planning policies and provides a planning balance against heritage impacts
  - Section 5 – provides a short conclusion.



## 2 Application responses

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### Introduction

- 2.1 The original application was submitted 7<sup>th</sup> November 2019 and formally advertised to neighbours and statutory consultees from the 14<sup>th</sup> November. The Council's website indicates that a total of 103 individuals and organisations were notified of the application, as well as advertisement being placed in the local paper and on the site, in the normal way.
- 2.2 The consultation resulted in a total of 260 responses being submitted to the Council from the public (the last of which at the time of writing is dated 10<sup>th</sup> March 2020), all of which are publicly available on the Council's website. In addition, there were 14 responses from statutory consultees, which are also available on the council website
- 2.3 The section below summarises the comments made by both the public and consultees.

### Public comments

- 2.4 A total of 260 responses are reported on the Council's website, of which 255 identify themselves as objections to the application.
- 2.5 A review of these comments indicates that the vast majority of these objections relate to the scale and the design of the buildings. Generally, these comments relate to the height of the building, considering that it is too tall for this central location and this in turn having negative impacts on the amenity of neighbouring properties and also the historic character of the city centre.
- 2.6 Objectors also criticise the design of the building, objecting to the common approach to both buildings, arguing that they appear as one "monolith" and questioned the approach taken to the materials to be used.
- 2.7 A further recurring theme in objections was the impact of the proposals on the heritage assets within the area, notably the city wall and the Conservation Area and Listed buildings in Northernhay. Objectors point to the overshadowing of these assets and the impact that this may have upon them. A response to these comments is included in the Historic Environment Desk-Based Assessment, Volume 3: Non-Technical Summary submitted with the amended plans.
- 2.8 Residents have pointed to the potential impacts of the buildings on sunlight and daylight to their dwellings, potential for overlooking and nuisance (noise and disturbance) from future occupants, all of which they consider will impact on their properties and some note reduce their property values.
- 2.9 A small number of objectors have also commented on the increase in traffic and movements that the scheme might bring, and a small number have noted that the use of the building, for co-living, would appear to be another form of student accommodation, which should not be supported. A theme arising in later submissions picked up by objectors, is that the form of housing would appear to encourage a very transient population, which would not support local community cohesion and is likely to result in anti-social behaviour

**Georgian Society, Victorian Society, Exeter Civic Society, Save Our Historic Exeter**

- 2.10 Each of the groups provides objections which broadly reflected each other, focusing on the impacts of the development on the heritage assets of the city. The objections primarily focused on the grounds that the scale and massing will adversely impact the Conservation Areas and the setting of listed buildings, principally by overshadowing the buildings of Northernhay Street and being visible in views within the city. The groups also pointed to views of the city from the surrounding countryside and that the accommodation is small, with limited space for residents. A response to the comments raised are included in the Historic Environment Desk-Based Assessment, Volume 3: Non-Technical Summary submitted with the amended plans.

**Statutory consultees**

- 2.11 Responses from 14 Statutory Consultees were received during the course of the consultation.
- 2.12 Responses from the following raised no objections and provided either proposed conditions to be imposed in the case of an approval, standard responses and/or further advice to be taken into account at detailed design stage:
- South West Water
  - Arborocultural Officer
  - Devon & Cornwall Police
  - Environmental Health Officer – Contaminated land.
  - Devon & Somerset Fire & Rescue
  - ECC Building Control
  - RSPB
  - Exeter Airport

- 2.13 Consultee who did raise objections or requested further information:

**Environmental Health Officer – Noise, Lighting and Air Quality**

- 2.14 The officer requested additional details to be provided to address questions raised and to clarify technical points. This material was submitted to the officer and resolved the questions posed.

**Natural England**

- 2.15 Natural England requested that a Bio-Diversity Net Gain calculation be provided. This is not a statutory requirement at present, but the assessment was undertaken and submitted to the council for review. It demonstrated a 600% increase in biodiversity following development, far in excess of the 10% target being introduced nationally.

**Exeter Cycling Campaign**

- 2.16 Welcomed the approach to cycle parking and the amendments to the public realm but asked for further clarification, which was provided as part of wider material submitted in regard of transport measures.

### Lead Local Flood Authority

- 2.17 The officer requested additional details regarding drainage calculations, which was provided and confirmed as acceptable.

### Historic England

- 2.18 Consultation with officers of Historic England had formed a central element in the preparation of the proposals prior to submission of the application and the scheme was amended to reflect these discussions. However, officers of Historic England issued an objection to the application which criticised the scale and massing of the building, the way in which is responded to the underlying topography of the area and the elevational treatment.
- 2.19 The objection criticised the approach taken by the Heritage Desk Based Assessment which accompanied the application and also requested that a deposit model and archaeological evaluation be produced in order to better understand and assess the impacts of the proposals on the buried archaeology.
- 2.20 The objection concludes with a Recommendation which states
- “ Historic England would be pleased to assist with further discussion of these recommendations:*
- Further reduction in height to act as a better transition between St David’s CA and Central CA.*
  - Loss of the upper glass box and a more subservient appearance to the upper levels.*
  - Greater modulation within the roofline of the building to respond to the topography*
  - Review of the elevational treatment to break up the uniformity of the design and reflect the diversity of architecture within Exeter”*
- 2.21 A full consideration of the comments raised by Historic England are included in Section 4 of the Historic Environment Desk-Based Assessment, Volume 3: Non-Technical Summary.
- 2.22 Officers of Historic England were approached following amendment to the scheme design, however have declined to engage with the further changes made to the scheme prior to submission of the amended plans. However, it is considered that the amended proposal has addressed each of the recommendations made and provided additional material to address the requests for further information made by the consultee in their written comments. This is addressed in more detail in Section 4 of this statement.

### Summary

- 2.23 The planning application (Ref 19/1556) has been subject of widespread public consultation in the period since submission in November 2019. All comments received from both interested parties and from statutory consultees have been reviewed and considered as part of the revision of proposals and further engagement undertaken where appropriate.
- 2.24 The amended scheme, as described in the following section, has taken into account these comments and objections where reasonably possible and this is described further in Section 3.

## 3 Amended Proposals

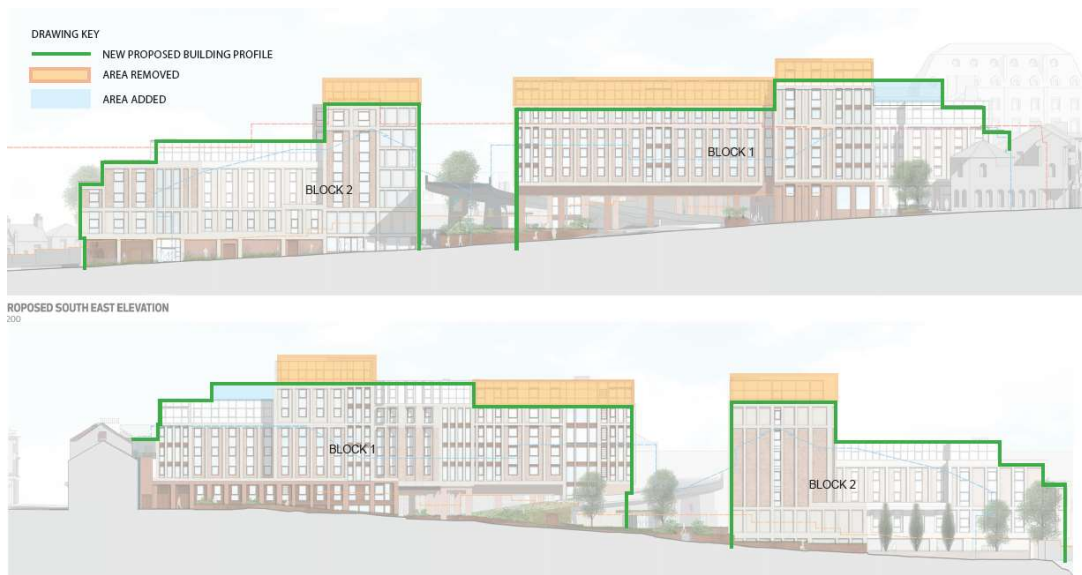
### Introduction

- 3.1 The following section set out a summary of the changes made to the proposals, firstly reflecting the comments made during the consultation period for the application and then summarising the proposals now proposed to be delivered. A full description of the changes and the proposed scheme are included as an additional chapter to the Design and Access Statement (Chapter 5) submitted with the amended plans.

### Response to objections raised

#### Height and stepping

- 3.2 The very clear and primary objection from neighbours and also from Historic England and the heritage societies focuses on the scale and notably the height of the buildings proposed. Simply stated, each objected to the size of the buildings and the impact that this had on the heritage assets of the area, as well as immediate neighbours.
- 3.3 In their objection Historic England considered that the proposals, because of their height and massing, did not reflect well the underlying topography of the site and recommended that the building “step” to reflect the changes in levels.
- 3.4 The image below illustrates the changes that have been made to the height of the buildings in response to these objections.



- 3.5 The overall height of both blocks of accommodation have been reduced by the removal of the top floors of the highest part of each building. In addition, what was the fifth floor Paul Street wing of Block 1, has also been completely removed.

- 3.6 These changes result in a reduction in the overall height of the building, as shown by the green line in the images above. This also clearly illustrates how the buildings now “step down” from Queen Street, towards Iron Bridge, reflecting the underlying topography as requested by Historic England.

#### **Top floor detail**

- 3.7 Objections were received from Historic England regarding the design solution adopted for the top floor of the building, which was to be glazed.
- 3.8 As a result, and following consultation with the council’s planning and design officers the top floor glass cladding has been reviewed and replaced with a more expressive form comprising elegantly proportioned bronze colored metal framing on Block 1 and a light grey cladding on Block 2.

#### **Elevational treatment**

- 3.9 Various objectors criticised the approach taken to the elevations, which had been imagined as a single approach across the two buildings. Objectors considered that this created a “monolithic” and “unremitting” approach and following dialogue with design officers of the council, an alternative approach has been adopted for the amended plans. This approach has retained much of the elevational approach proposed for Block 1 but then significantly amended the proposals for Block 2, meaning that they no longer look similar in their appearance.
- 3.10 In parallel with this, it was also decided that the Co-Living building, Block 1, would be designed to achieve Passivhaus Principles. This required a reconsideration of the detailed fabric of the building, though the overall orientation, mass and format of the building already provided significant sustainability benefits and did not need to be altered. The Hotel, Block 2, was originally designed to achieve BREEAM Excellent and this has continued.

#### **Block 1**

- 3.11 As noted above, the top floor of the building has been altered to introduce a bronze coloured metal framing and in addition the horizontal feature band removed in order to enhance the vertical emphasis. The other main changes for Block 1 relate to the removal of glazing from kitchen areas and public spaces, which aids the achievement of Passivhaus Principles and also has the added benefit of reducing opportunities for overlooking of dwellings on Northernhay, as well as limiting light spill in that direction.
- 3.12 The illustration below was produced during the revision of the scheme and illustrates the design progression undertaken during the revision of plans and elevations.



## Block 2

- 3.13 The amendments to the Block 2 elevations have been more significant, seeking to differentiate the building from Block 1. They have been more extensively re-designed with new proportions and materials proposed to assist in modulating and breaking up the horizontality of the elevations. The result is to present a more terrace like appearance of blocks stepping down Paul Street in response to the topography.
- 3.14 The materials have been amended to introduce greater use of a redbrick on the larger vertical bays, whilst a lighter buff brick is to be used in-between the vertical bays to help modulate and break them up.
- 3.15 The ground floor treatment fronting Paul Street has been rationalised by the removal of unnecessary vertical breaks and instead to allow a separation of the upper floor levels above a strong base to the building. A technique adopted to help further modulate the elevational design and to create a distinct ground level.
- 3.16 The elevational appearance of the former glazed stair core fronting onto Paul Street has been simplified to help establish a regularity to the terraced appearance of the block.



- 3.17 On the façade facing towards Northernhay Street, a new Green Wall has been introduced on what would otherwise be a blank façade. The original scheme had proposed a number of windows to this elevation, but this had caused some concern for residents worried about overlooking from the stairwells and light pollution. Therefore, the windows were removed but this resulted in a potential blank façade.
- 3.18 The proposed Green Wall will soften this elevation, providing seasonal changes of colour and texture, as well as providing some additional habitat.



### **Building One – Co-Living**

- 3.19 The building will be purely Co-Living accommodation including 259 Co-Living Beds. 100 bedspaces will be in self-contained studios, with a small kitchenette as well as an en-suite in each room. The remainder of rooms will be arranged into 27 apartments where residents will have their own bedroom and en-suite but share a communal kitchen. .
- 3.20 On each floor of the building will be located additional spaces which will be arranged as communal spaces for all residents to use and will be available for groups to meet as a floor or in smaller groups.
- 3.21 On the lower floors the building will have the normal range of services including reception, laundry, bin store and plant rooms, which have not been amended (reduced) in the amended scheme from what was proposed for the original, larger, scheme.
- 3.22 Also, on these lower floors there will be a range of communal spaces which will be available for the residents to use and be managed by the building's dedicated team. These will be available for residents to utilise and will be flexible, to reflect the demands of the residents. These have been retained at the same size as the original scheme, in order to provide residents with a range of spaces to use.
- 3.23 The removal of floors to the building has though meant a rationalisation of rooms on the upper floors and the original scheme had two amenity rooms on each of the upper floors. This has been reduced to one per floor, so that the overall level of amenity space within the building has been retained at the same level as the original submission but the total floorspace reduced to reflect these lesser numbers.



- 3.24 In the same way the bike storage area on the ground floor has been reduced to provide 138 spaces, which is excess of the Council's standard for Houses in Multiple Occupation (HMOs) and student accommodation, which is 1 space per first 10 beds and then 1 space per every two rooms.
- 3.25 The building will be managed by a central experienced management company and a Management Plan accompanied the original submission and has been amended to reflect some of the comments raised during the consultation. The amended management plan confirms that the building and all of the surrounding space shared with the hotel will be managed by the Co-living block team. There will be a presence on site 24 hours a day, 7 days a week. This will be provided by the dedicated management or security team.
- 3.26 The amended Management Plan confirms that the Building Manager will have the responsibility of organising events for the residents in order to help build the community which is central to Co-Living as a concept. Also, the plan confirms that tenancies will be a minimum of 3 months, in order to avoid transient residents and again to help build community.

#### **Building Two – Hotel**

- 3.27 Block 2 was originally intended to include a mix of hotel and Co-Living accommodation. However, the removal of floorspace from the building means that it is no longer possible to provide this mix and the whole of the building will now provide hotel accommodation.
- 3.28 The redesign of the building has meant that it now accommodates 128 bedrooms, an increase on the originally submitted scheme. The hotel entrance is still to be located at the north end of the building, onto Paul Street and the ground floor includes a restaurant and bar for residents. As originally submitted, the bar does not have any outside seating area.
- 3.29 The hotel will still have a car park beneath which has a total of 40 car parking spaces, plus 4 disabled spaces. This include 2 Electronic Charging points, along with motorcycle parking areas and cycle parking for 6 bikes.

#### **Interpretation box**

- 3.30 The scheme as submitted included a building which is being designed in conjunction with the RAMM which will aid interpretation of the history of the site and surroundings. This is unchanged from the original submission.

#### **Pedestrian Bridge**

- 3.31 During the course of the application, discussions have continued with the owners of the Guildhall Centre which is physically linked to the existing Harlequins building by both a road and a pedestrian bridge. It was originally intended that the pedestrian bridge be removed, whilst the road bridge was to remain in situ, as it is the only route to serve the Guildhall Car Park.
- 3.32 During the course of discussions with the owners of the Guildhall it became clear that the pedestrian bridge is an important and popular route, which supports trade within the Centre. The revised proposals

therefore include a replacement footbridge in the same location as the existing, with lift and stair access from Paul Street which enable wheelchair use.

### **Landscaping and public realm**

- 3.33 Proposals for the redevelopment of the Harlequins Centre have focused on the improvements possible to the public spaces around the building, including enhancing Paul Street. The proposals for these spaces are unchanged from the original submission. The landscape of the spaces between the buildings has been carefully considered and will provide high quality space for residents and visitors, enhancing the experience for all of the historic city wall.
- 3.34 Proposals to reduce the carriageway width on Paul Street and the increase the available space for pedestrians are continued, with detailed discussions continuing with officers to confirm the details of this.

## 4 Planning Analysis

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- 4.1 This section considers the proposals for the redevelopment of the Harlequins Centre, as amended, in the light of the Development Plan policies and material considerations.
- 4.2 A full description of the relevant policies was set out in detail in the original Planning Statement submitted November 2019, Section 5. There have been no changes to the development plan position since the submission of the application and therefore the development plan is made up of the Local Plan First Review 1995-2011 (Adopted March 2005) and the Core Strategy Development Plan Document (Adopted February 2012).
- 4.3 The Council embarked on the preparation of a plan to replace development management policies, alongside the Core Strategy, but the Development Management DPD was stalled before publication stage. The council, with its neighbours, has embarked on the preparation of the Greater Exeter Strategic Plan (GESP). A draft of this plan was intended to be issued in summer 2020. However, this is now delayed until September at the earliest.
- 4.4 Therefore, the Development Plan position remains as stated in the original planning statement,
- 4.5 *“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.*
- 4.6 *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”.*
- 4.7 A full description of the relevant policies is set out in Section 5 of the original Planning Statement (November 2020) and is not replicated here.
- 4.8 Since the submission of the application there has been the appeal decision issued in regard of two applications for redevelopment of a site known as Walnut Gardens. This is described in Section 1 of this report and provides useful references in regard to the application at Harlequins Centre, as the schemes and the issues are fairly similar. Therefore, where relevant, the appeal decision is referred to below.
- 4.9 The analysis considers how the amended proposals align with the policies of the Council and it follows the same structure and headings of the original submission made in the Planning Analysis section of the November 2019 Planning Statement.

### Loss of Retail Use

- 4.10 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 ... if it would harm the vitality and viability of the centre*’.
- 4.11 Evidence was submitted with original application in 2019 which identified the vacancy of units within the Harlequins Centre and that the loss of the retail floorspace would not impact the vitality and viability of the centre. This evidence has been accepted by the Council and there have been no responses seeking the retention of the shopping centre in its current use.
- 4.12 It is considered common ground that the loss of the Harlequin Shopping Centre is in line with the policies of the Development Plan, specifically Policy S3, as the proposals are accepted to not impact the vitality and viability of the city centre.
- 4.13 The key discussions therefore relate to the proposed replacement buildings and their uses.

### Principle of Alternative Use: Hotel

- 4.14 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.
- 4.15 Evidence presented in November 2019 demonstrated the market for additional hotel bedspaces within Exeter and on this basis, and the general presumption for support for such uses in the city centre, it has been accepted that, in principle, a hotel is an appropriate use for this city centre site.

### Principle of Alternative Uses: Co-Living

- 4.16 It is accepted that residential development is an appropriate use within the city centre. The principle of housing in its widest sense is accepted and there are no suggestions that this is not the case.
- 4.17 In the Walnut Gardens appeal decision, the Inspector confirmed that the council cannot evidence a five year housing land supply and he confirmed that the Council’s housing land supply is significantly below 5 years. He concluded that the Council’s policies for the supply of housing are out of date.
- 4.18 Proposals for the redevelopment of the Harlequins Centre for residential uses would therefore accord with the thrust of the Government’s objective of boosting significantly the supply of housing. It would also be in line with the Council’s Liveable Exeter Vision, which proposes the redevelopment of the area for a mix of uses, including residential.
- 4.19 There have though been concerns expressed by neighbours and some objectors about the form of residential development that is proposed, Co-Living. This is a new form of residential model and in order to introduce the use the original application was accompanied by the document “An Introduction to Co-Living”. This provided a summary of the concept and some explanation of how the model might function at the Harlequins Centre. This has not been amended for the purposes of the amended scheme as the background to Co-Living remains the same, which is for high density living aimed specifically at those,

typically young professionals, who are seeking good quality, well located accommodation which is centrally managed but also functions as a community in its own right. The Co-Living concept is one where the residents are encouraged to interact and to form their own community within the building, as well as with neighbours.

- 4.20 As such the use does not fall into any of the established residential use classes which are set out in the Town and Country (Use Classes) Order 1987 (as amended) or in planning policy such as the National Planning Policy Framework (NPPF) (2019). It is accepted widely that Co-Living is a “sui generis” use. In addition, there are no specific policies which relate to the use in any of the development plan documents, or indeed the NPPF.
- 4.21 It is anticipated that policies relating to Co-Living and other similar residential uses will be drafted as part of emerging plans and it is understood that such a policy might be included in the GESP, when it is used. However, for the moment there are no policies locally for such uses.
- 4.22 The housing model has progressed more fully in London and as part of the emerging Mayors Plan there is a specific policy which relates to Large-scale purpose-built shared living. (Policy H16). This policy is not relevant for application in Exeter, nor indeed is actually adopted as yet. However, it does provide some clear indications of the issues that might be considered to be relevant in designing such a building. It also reconfirms the status of these uses being sui generis use class.
- 4.23 The policy criteria for the characteristics of buildings such as Co-Living blocks from the London Mayors Plan (Policy H16) are set out below, along with comments relating to the Harlequins Centre proposals.

London Plan Criteria	Harlequins
it is of good quality and design	Design issues are addressed in Section 3 of this report and specifically in the associated Design & Access Statement
it contributes towards mixed and inclusive neighbourhoods	The original scheme was intended to be student accommodation, but this was amended following concerns raised at pre-application consultation stage due to over concentration of student use in the vicinity. The proposed scheme is open to all but will be marketed and focused on young professionals.
it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency	The city centre location is well located and there will be no parking spaces dedicated to Co-Living residents within the site. There will though be significant bike parking.
it is under single management	The building will be under single management, who will also manage the wider public spaces, including the pocket park.

its units are all for rent with minimum tenancy lengths of no less than three months	The management plan submitted with the amended proposals confirms that any tenancy agreement will be a minimum of 3 months.
communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least: a) convenient access to a communal kitchen b) outside communal amenity space (roof terrace and/or garden) c) internal communal amenity space (dining rooms, lounges) d) laundry and drying facilities e) a concierge f) bedding and linen changing and/or room cleaning services	All of these facilities will be provided for all residents as part of the building, except for a private garden or roof terrace. There are significant areas of open space created around the building, including the pocket park, which residents can access. However, these are all open to the public, so that the wider community can benefit from the space, as well as the residents.
the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes	The individual rooms provide sufficient space for independent living in conjunction with the shared spaces. There is shared space on each of the floors to provide for small numbers of residents, with a concentration of spaces on the lower floors, which provide a choice of space types for residents to shape.
a management plan is provided with the application	A management plan is submitted with the application.

- 4.24 It is considered that the proposed Co-Living block does provide a suitable form of accommodation and one which will provide a useful addition to the market in the city.
- 4.25 It is considered that, 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 and this was a benefit noted by the Inspector in the case of the Walnut Gardens appeal (even though in that instance the use was for student accommodation, which would, it is assumed, deliver less benefit to the local community than a wider Co-Living use).

### Housing Delivery Test

- 4.26 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 Government's calculation of housing delivery.
- 4.27 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.
- 4.28 The original Planning Statement included a calculation for the number of units that the scheme would deliver against this measure. Using this calculation method, the amended application has reduced the number of bedrooms, but the amended scheme would still contribute a total of 144 dwellings to the city council's housing delivery test figures.

### Community balance

- 4.29 Adopted Local Plan Policy H5 seeks to limit developments such as student accommodation, 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*". The application of this policy was considered carefully in the preparation of the original scheme and resulted in the change from a student scheme to that of Co-Living.
- 4.30 The provision of a Co-Living block is intended to encourage a wider range of persons than just students into the area and provide for a greater mix of residents, meeting Policy H5 of the Adopted Local plan.

### Community Infrastructure Levy (CIL)

- 4.31 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.
- 4.32 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

- 4.33 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 parts of buildings relate well to adjoining buildings, spaces and to human scale and 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.



- 4.34 The design and scale of development was one of the key considerations in the development of the original application and has further been a focus for objections from statutory consultees as well as neighbours.
- 4.35 The original scheme was significantly reduced in height from that proposed at the pre-application consultation stage, but the amended plans propose a further reduction in the height of the buildings.
- 4.36 The scale of the buildings is clearly shown in the submitted plans and cross sections. The impact of the buildings, as amended, has been assessed through a Landscape and Visual Impact Assessment (LVIA) which is submitted with the amended plans. This concludes that “whilst the development generates some adverse visual and landscape effects, particular in relation to Northernhay Street immediately to the west of the site, the appropriate regeneration of this important city centre site and the beneficial effects on Central Conservation area, the wider townscape and other views are considered to outweigh the localised and specific adverse landscape and visual effects” wider area, therefore meeting the terms of Adopted Policy DG1.

#### **Solar Shading**

- 4.37 A Solar study was submitted with the original application and that study has now been updated to reflect the amended proposals. This demonstrates that the reduction in development height results in a reduced impact on the adjacent dwellings from the original scheme.
- 4.38 In additional support to the amended plans, a new Daylight and Sunlight Report has been produced. The report has been prepared in line with BRE guidance to assess, by detailed technical analysis, the anticipated impact of the Proposed Development on the daylight and sunlight amenity enjoyed by relevant existing properties immediately neighbouring the Application Site.
- 4.39 The report reiterates the background to such analysis and reconfirms that there is no specific planning policy which provides a clear criterion for judging an application. The BRE Guidance also does not provide a “standard” to be met or a single formula or approach to be adopted in assessing impacts.
- 4.40 As such the report assesses the impacts of the proposed development on windows of residential buildings neighbouring the site and calculates, using a series of methods, the likely impact of the proposals on the 255 windows in those buildings
- 4.41 The results of the assessments indicate that the proposed development is expected to have very limited impacts on the light amenity enjoyed by the surrounding properties. These limited impacts are quite isolated and relate to a limited number of windows and rooms for properties on Northernhay Street and Lower North Street.
- 4.42 Generally, these rooms are bedrooms, which do not have the same need for light distribution as other primary habitable rooms in dwellings. Although the BRE Guide states bedrooms should be analysed in relation to daylight, they are considered by the BRE Guide to be less important than living rooms.
- 4.43 There is one instance where there is a living room which does not meet the daylight target. That impact is essentially due to the dwelling being extended to the rear, away from the application site and two internal rooms being knocked into one. This then makes it difficult for the larger room to comply.

- 4.44 There is also one front garden of a property which does not comply and there are also a number of windows in Northgate Court which do not comply, but this is due to the presence of existing balconies on that building itself and not resulting from the redevelopment of the Harlequins site at all.

#### **High Quality Design**

- 4.45 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.
- 4.46 Design of the buildings has been central to the amendments of the proposals, with the elevational treatment of both buildings being revised to reflect comments arising from the public, consultees and officers of the council. The revised buildings are described in detail in the Design & Access Statement Chapter 5 which accompanies the amended plans and in summary relate to a revised approach to the top floor of the building, to reduce the amount of glazing on both buildings and adopt a contemporary approach.
- 4.47 The façade of Block 2 has been more comprehensively remodeled, to create additional vertical emphasis to the building, remove areas of glazing to public spaces and introduce a Green Wall to the façade facing Northernhay Street, as well as revisions to the top floor materials.
- 4.48 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.

#### **Ground contamination**

- 4.49 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.
- 4.50 The Harlequins Site has been previously developed, notably for a foundry and more recently for a bus station. Therefore, there may be the prospect of contamination and a Preliminary Geo-environmental and Geotechnical Assessment was prepared and submitted with the original application.
- 4.51 The council's Environmental Health Officer has confirmed that the scope of that report is acceptable and has confirmed no objection to the application on this basis. She has recommended that a standard condition be applied to any decision to secure a safe development in accordance with para 179 of NPPF and Core Strategy Policy EN2.

## **Sustainability**

- 4.52 The original scheme aimed to achieve a BREEAM 'excellent' rating for both buildings and a BREEAM Pre-Assessments have been completed and confirmed that the target can be achieved.
- 4.53 However, following submission of the application further consideration has been given to the appropriate design of the buildings.
- 4.54 The applicant has decided that Block 1 will be designed to adhere to Passivhaus Principles, an extension beyond BREEAM for the building itself. In regard of the Co-living block the design team has worked with Exeter City Living to review the previous design and agreed how they be amended to improve thermal efficiency, comfort and ventilation to optimise the design from a Passivhaus perspective.
- 4.55 The design of the building has been amended to reflect these concerns and a separate Passivhaus Pre-Assessment Report is submitted with the amended plans. This report firstly assesses the original proposals and then provides recommendations to achieve the fabric performance criteria required to meet the Passivhaus standard.
- 4.56 The report recommendations have been implemented in the amended design and the Design & Access Statement confirms in detail what those changes have been, which are also picked up in the amended Energy Statement submitted alongside the amended plans.
- 4.57 The original form of the building and its orientation were identified at the outset of the project as sustainable forms which contribute to a sustainable design. The application of Passivhaus Principles has focused more specifically on the materials chosen and the detailing which ensures air tight buildings. The elevations of the building have been amended to reduce areas of glazing, to support this approach and energy efficient material substituted in certain areas. In addition, 110sqm of Photovoltaic cells have been added to the roof of the building, which will generate renewable energy.
- 4.58 In these ways, it is proposed that the amended scheme not only achieve the targets set by the Council's adopted policy, but goes beyond this, with Block 1 meeting Passivhaus Principles which go beyond the BREEAM levels required by policy. Indeed Block 2 will also meet BREEAM targets above those required by the adopted planning policy, as it will deliver to the current BREEAM Excellent standard which is agreed to be higher than the policy requirement, as confirmed by the Inspector in the recent Walnut Gardens appeal.

## **Occupier Amenity**

- 4.59 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, it is accepted that this guide relates to the concept of a more traditional housing model, provided in an urban extension or estate layout. It is not necessarily directly applicable to large-scale purpose-built shared living such as Co-Living.
- 4.60 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 building which is well located for a range of

services and facilities and specifically is seeking accommodation with a clear community. As such it is considered that personal outside amenity space is not a requirement and residents utilise the wider city spaces for their informal recreation, rather than more traditional private gardens.

- 4.61 The Co-Living building provides a private bedroom with en-suite facilities and wider 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 building.
- 4.62 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.
- 4.63 Despite the reduction in the number of residents within the co-living building, the majority of these shared spaces have remained unchanged during the amendments to the proposals. All of the shared amenity spaces on the lower floors have remained unchanged. On the upper floors the level of shared amenity space has been reduced, removing one of the two share areas per floor. However, due to the reduced number of beds being provided, this has retained the level of amenity space per bedroom available to residents to that of the original submission.
- 4.64 It is therefore considered that the amenity of residents of the Co-Living block will be protected and provide a good quality living environment for residents who seek this form of accommodation.

#### **Impact on Neighbours - Overlooking**

- 4.65 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.
- 4.66 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.
- 4.67 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 original preparation of proposals, the scale of the overall buildings was adjusted and significantly reduced in order to mitigate impacts on neighbouring properties. The overall height of the building has been further reduced within the amended plans.
- 4.68 The proposed building 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 neighbouring buildings on Northernhay Street.
- 4.69 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.

- 4.70 The principles applied in the SPD, notably in regard to privacy and overlooking, have however been considered during the design phases for the Harlequins Centre site.
- 4.71 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. In consideration of the Walnut Gardens Appeals, the Council confirmed that it applied a 21-metre rule for distances between facing windows of habitable rooms but also confirmed that this has been relaxed “in some situations to ensure the more efficient use of previously-developed urban land for housing” (Inspectors report para 53).
- 4.72 For the majority of the development the distance between habitable room windows of 21 or 22 metres is maintained and, in most areas, bettered. However, there are points where the hotel or Co-Living block 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 original Design & Access Statement where the various relationships are illustrated and none of these relationships have been changed in the amended plans.
- 4.73 The DAS shows that the western end of the hotel block, facing to No42 Northernhay Street, will be within 20 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 from those areas.
- 4.74 Within Block One, the Co-Living block, there are a small number of bedrooms which are within 20m 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.
- 4.75 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**

- 4.76 It is accepted that neighbours may be disturbed by the activities of future residents of both the Hotel and the Co-Living block.
- 4.77 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 was removed from the plans.

- 4.78 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.
- 4.79 In these ways the potential impacts of the development proposals on neighbouring properties have been mitigated.

### **Accessibility**

- 4.80 The original application included evidence relating to the location and the range of alternative transport modes which can be utilised to access the city centre site.
- 4.81 It is clear that the location is highly sustainable and well connected for pedestrians and cyclists, as well as by those using public transport. It is within the Housing Core Area of the City, as defined in the Adopted Local Plan and 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.
- 4.82 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.
- 4.83 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.
- 4.84 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.
- 4.85 In addition to general streetscape enhancement 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**

- 4.86 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.
- 4.87 The development proposals are unchanged from the original submission and includes for a total of 44 car parking spaces to be provided below the hotel building, which will include 4 disabled spaces and 2 Electric Vehicle Charging Points. Within the 44 spaces, the dedicated spaces for the local business will also be retained, identified within the wider car park in a specific area.
- 4.88 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**

- 4.89 The scheme has been amended to reflect the reduced number of residents in the Co-Living block, such that a total of 138 cycle parking spaces will be provided within the ground floor of the Co-Living building, a ratio greater than one cycle space per two bedrooms. These spaces will be secure and accessed from the courtyard fronting Paul Street and have level access to the street.
- 4.90 In common with the original application, 24 cycle spaces will be provided in a room under the vehicle ramp to the guildhall car park and a further 16 spaces will be provided outside, to the rear of the building.
- 4.91 Following discussions with the highway authority during the consultation period, an additional 10 spaces will be provided in the courtyard at the front of the Co-Living building, primarily for use by visitors to the block.
- 4.92 For the hotel, the provision of spaces is unchanged with a total of 6 cycle parking spaces to be provided for hotel users and staff, located within the car park area beneath the hotel building.
- 4.93 Finally, 16 cycle parking spaces will be provided on Paul Street located within the middle of the frontage for residents, guests and the public. These will be suitable for the provision of Co Bikes and discussions have been held with the operators for this to be delivered.
- 4.94 A total of 208 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 as set out in the Sustainable Transport SPD (March 2013).



### **Servicing**

- 4.95 Proposals for servicing of the new buildings are unchanged from the original submission. The existing situation of servicing vehicles accessing the rear of the building, adjacent to the city wall and neighbouring properties, is proposed to be replaced by servicing from bays on Paul Street.
- 4.96 The two new servicing bays will be created 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.
- 4.97 Building entrances and bin stores are located in close proximity to these servicing bays so that movement of deliveries and bins is minimised. 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**

- 4.98 It has already been reconfirmed that the application site lies in a sustainable location and the highway authority has raised no objections in principle to the application as submitted.
- 4.99 It is considered that the local highway network would satisfactorily accommodate the movements 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.
- 4.100 The traffic impacts of the scheme are considered to be acceptable at this location given the requirements of the development plan and paragraph 108 of the NPPF. Detailed highway plans are submitted with the amended plans, demonstrating how the changes will be delivered.

### **Economic Impact**

- 4.101 An Economic Impact Assessment of the original proposal was submitted in conjunction with the application and the findings have been updated to reflect the amended scheme.
- 4.102 This report has been prepared in line with best practice, but clearly the current pandemic has had a significant impact on the world economy. Therefore, some of the assumptions about future economic activity, such as visitor numbers and spending, will be impacted in the short term but it is anticipated that in the long-term figures will return to pre-Covid levels.
- 4.103 More immediately, the Harlequins site can, subject to planning approval, progress with a major investment in the city and it is calculated that the construction costs of the new buildings would be just under £35m. This investment would help to support the local economy in the coming years and immediately support the equivalent of 23 full time construction jobs.
- 4.104 Once operational, the Co-Living accommodation will directly employ 7 individuals including managers, maintenance and security personnel, whilst it is calculated that the hotel will generate 32 full time equivalent jobs.

- 4.105 Spending from the residents of the Co-Living accommodation is calculated to be £4.9m per annum into the local economy and this would in turn support 34.5 jobs. At the same time, when the hotel is operating fully the visitors to the city would generate an additional spend of £3.9m per annum, supporting a total of 27 jobs.
- 4.106 In total the development therefore is calculated to support 124 jobs and the assessments notes that, based on the best practice approach, this might expect to generate 56 new jobs as a result. In terms of spending into the local economy, these additional jobs might be expected to add an additional £2.4m per annum into the Exeter economy.
- 4.107 Therefore, the direct impact of the development will be through the construction phase, which it is considered will take 18 months to 2 years to complete. By this time, it is hoped that issues around Covid-19 will be resolved and there will be some return to “normal”. Once operational, the new accommodation will have the potential to generate £8.8m per annum directly into the local economy, with an additional £2.4m per annum as a result of this spending and the wider jobs created.
- 4.108 This significant investment, at what is a very difficult time for the economy, clearly achieves the “economic objective” of achieving sustainable development, as set out in the NPPF Para 8.

### Ecology

- 4.109 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. An Ecological Assessment report was submitted with the original application.
- 4.110 Comments to the original application were received from the RSPB which suggested that additional bird boxes should be provided within the scheme and this advice has been accepted in preparing the amended plans.
- 4.111 Natural England provide comments that reminded the council that, as the competent authority, it may need to undertake an appropriate assessment due to potential impacts of development on the Exe Estuary SPA and Ramsar site. This is for the Council to undertake as part of its consideration of the application.
- 4.112 The Natural England advice also recommended that a biodiversity net gain calculation be undertaken for the proposals. A calculation was completed and submitted to the council in January 2020. This initial assessment demonstrated a positive net biodiversity gain of 615%.
- 4.113 The net gain calculation has now been revised to reflect the amended scheme which continues to include a net gain of trees within the site, along with additional planting, a pocket park and green/brown roofs as per the original submission, plus a new Green Wall to one elevation of the building included in the amended application.
- 4.114 The amended net gain calculation shows a positive net gain of 616%, very significantly above the 10% target set by emerging best practice and in accordance with paragraph 175 of the NPPF and Policy CP16 of the Exeter City Core Strategy.

### **Trees**

- 4.115 An existing tree survey and arboricultural impact assessment has been carried out by Aspect Tree Consultancy Ltd for the proposed development and submitted with the original application. It demonstrated that there was no net loss of trees on site and the Council's Arboricultural Officer confirmed that there were no objections to the application.
- 4.116 The proposals in regard of existing and proposed trees have not changed as part of the amended plans.

### **Air Quality**

- 4.117 An air quality assessment was submitted with the original application and a subsequent assessment provided which was expanded to include the impact of the proposed CHP plant and provided details on a boundary monitoring survey to assess dust emissions during the construction phase. This was considered by the Council's Environmental Health Officer and confirmed to be acceptable.
- 4.118 The amended scheme has been assessed and a further report submitted with the amended plans which confirms that the impacts of the proposed development will be less than those considered in the original application and as such will accord with Core Strategy CS Policy CP11.

### **Noise**

- 4.119 A Noise Assessment was submitted in conjunction with the original application and further supplementary material and clarification was provided at the request of the Council's Environmental Health officer in January 2020. This provided commentary on the difference in background noise levels measured by consultants for the applicant and an alternative survey prepared on behalf of residents. It also addressed comments regarding the proposed CHP plant, and considered the appropriate criteria for the assessment and includes consideration of construction and demolition works.
- 4.120 The assessments have been reviewed in the light of the amended scheme and this has confirmed that any impacts are less than those proposed in the original application.

### **Historic Environment**

- 4.121 The application site is located within the centre of the city, adjacent to the city wall (a scheduled monument), within a conservation area and close to a number of listed buildings. As such it has been acknowledged from the outset that heritage issues will be a key consideration in any proposals.
- 4.122 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 potential 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.
- 4.123 Emerging proposals were amended before submission of the application to reflect meetings with Historic England and officers of the council, taking on board their concerns about the scale of the proposed building and its design.

- 4.124 The original application was accompanied by a full HEDBA Impact Assessment which assessed the impacts of development and considered that the overall impact was “less than substantial harm” as defined in the NPPF. The Impact Assessment sought to justify that harm and therefore, it would fall to 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.
- 4.125 The impact of the proposed development on the heritage assets of the city centre is a key theme in many of the objections received from the public to the application, as set out in Section 2 of this Statement. Central to this have been Save Our Historic Exeter, a residents group and amenity groups; the Victorian Society, Georgian Society and Exeter Civic Society. All objected to the scale of the proposed development due to the impacts on heritage assets. Responses to the specific points made by each are provided in Volume 3 of the HEDBA, submitted with the amended plans.
- 4.126 Historic England provided their comments on the application in the days before Christmas 2019 and these provided a series of objections to the application and recommendations for changes to the scheme. A detailed review of these objections is included in the HEDBA Volume 3. Specifically, Historic England objected to the approach taken to the assessment of impacts, which was a tabular approach considering each of the assets in turn. This is difficult to understand as the approach has recently been utilised in the assessment of a new bridge at Tintagel Castle on behalf of English Heritage and agreed with Historic England. It was a project where there were a larger number of assets with equally, if not greater, complexity of relationships. Therefore, it is considered to be a robust approach agreed by relevant consultees previously and has been updated to reflect the amended scheme.
- 4.127 However, in response to the comments from Historic England, a second assessment has been produced by Heritage experts Turley, which provides an objective and separate assessment of the impacts on built heritage assets. This is submitted with the amended plans and describes the significance of assets and assesses the impact of proposals (as amended) on those individual or groups of assets, without recourse to tables. The report concludes that there is no harm to a large number of nearby assets on Queen Street and Northernhay Street, and that an improved setting, increased access to and interpretation of the city wall would enhance appreciation and understanding and overall the significance of that particular asset would be sustained.
- 4.128 The Turley report does note that there would be some harm to the significance of certain assets, notably the Central Conservation Area, St David’s Conservation Area, Exeter Dispensary and two properties, 39 and 42 Northernhay Street.
- 4.129 This list of assets is actually smaller than in the original HEDBA produced by Triskelion, which in its tables identified adverse impacts on a larger range of assets. However, both assessments reach the conclusion that, though there is some harm to heritage assets, in neither case does this amount to “substantial harm” as defined in the NPPF (Para 196).
- 4.130 The Historic England objection raises concerns about the impact of the building on the historic city wall by virtue of shade and therefore additional moss growth and moisture retention. But this incorrectly assumes that the new buildings will “encroach closer to and dominate the wall more than the current buildings” which is incorrect. The building will be no closer to the wall than the existing buildings and in most instances will be further away.

- 4.131 The Historic England comments also recommend the production of a “deposit model and archaeological evaluation”, to assess the impact on buried archaeology. However, consideration of buried archaeology has been thoroughly considered throughout the preparation of the scheme and the majority of the proposed buildings included within the existing footprint of buildings, where it is clear that previous disturbance has taken place. The approach to archaeology has been fully agreed with the council’s archaeologist and at no time has it been requested that a different form of assessment be necessary. This is a point that is fully considered in the HEDBA Vol3 which includes confirmation on this point from the council’s heritage officer and also a response from Dr Nick Watson a geoarchaeologist suggested by Historic England who confirmed that such an approach is not possible (See HEDBA Vol3 Section 7).
- 4.132 The Historic England objection letter sets out objection to the scale of the building, and its design, considering it to be “monolithic” and the top glazed elements would “glow when internally lit” and therefore the objections provided recommendations “to assist with further discussion”:
- *Further reduction in height to act as a better transition between St David’s CA and Central CA.*
  - *Loss of the upper glass box and a more subservient appearance to the upper levels.*
  - *Greater modulation within the roofline of the building to respond to the topography*
- Review of the elevational treatment to break up the uniformity of the design and reflect the diversity of architecture within Exeter.*
- 4.133 Each of these recommendations has been considered in revising the plans and the officers of Historic England approached in order to further discuss these amendments. The officers declined to engage in further discussion over the changes, simply referring the applicant’s team back to the comments made in formal objection to the application.
- 4.134 The design team have therefore amended the application plans to reflect the recommendations set out in the objection and reproduced above. Therefore,
- *The height of both buildings has been reduced*
  - *The upper glass box has been removed on both buildings*
  - *roofline of the buildings amended to respond better to the topography*
- The elevational treatment amended to break up the uniformity of the design and reflect the diversity of architecture within Exeter*
- 4.135 These amended proposals have been subject of assessment by both tabular and narrative assessment and the reports submitted in conjunction with the amended plans. They differ in the number of assets which are considered to be harmed but both assessments conclude that “Substantial Harm” would not occur to heritage assets, meaning that either no harm or “less than Substantial Harm” (to varying degrees as set out in the heritage reports) would occur to the assessed assets. Any harm must be subject to a “clear and convincing justification” by the applicant (as per paragraph 194 of NPPF 2019) but the findings of no “Substantial Harm” disengage para 195 of NPPF 2019 and moves the decision-making to para 196 “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”. Hence it is for Exeter City Council to weigh the benefits and adverse impacts.

4.136 This is the same position as for the Walnut Garden Appeal discussed more fully in Section 2 of this Statement. In that instance the inspector set out the benefits of the Walnut Garden schemes in para 19 and 20 of his report and they can be summarised as:

- The site would increase the supply of PBSA in the city in a location that is conveniently located with respect to the University and main services and facilities, including public transport.
- The proposals would entail the more efficient use of previously developed urban land for housing and would accord with the thrust of the Government's objective of boosting significantly the supply of housing
- The accommodation would have the potential to reduce the pressure on the existing housing stock and to release some houses in multiple occupation (HMO) by students for use by families
- The investment would provide economic benefits in terms of support for the construction industry, assisting in the expansion of the University and the increased spend on services and facilities by students.
- The use of solar panels on the roofs of the new buildings would assist in helping to tackle climate change
- The drainage strategy indicates that, subject to a reduction in run-off rates from the site, the risk of flooding elsewhere could be reduced

4.137 The Inspector therefore concluded that "these benefits would be substantial and can be given considerable weight" (Para 21).

4.138 A similar list of benefits can be provided in regard to the proposals for the Harlequins Centre:

- The proposals would increase the supply of residential accommodation in the city centre in a location that is conveniently located to a wide range of services and facilities, including public transport
- The proposals would increase the supply of hotel accommodation in the city centre, in a location close to tourist destinations such as the museum and cathedral, as well as the shopping centre.
- The proposals will entail the efficient use of previously developed land
- The proposal will boost significantly the supply of housing land by contributing 144 dwellings according to the Government Housing Delivery Test calculations
- The proposals will therefore reduce pressure on the existing housing stock and release houses currently in HMO for use by families
- The £35m investment in the city will help to generate approximately 40 direct FTE jobs on the site and approximately a further 30 FTE equivalent jobs within the local economy. Together this would generate an additional £8.8m annual spending into the local economy by residents and visitors to the hotel, with an additional £2.4m per annum estimated to be generated through the spending of those indirectly employed on the site.
- The hotel is designed to achieve BREEAM Excellent accreditation, whilst the Co-Living Block is being designed to achieve Passivhaus Principles. As such both buildings would assist in tackling climate change.

4.139 In addition to the benefits identified by the inspector in the previous appeal. There are also additional benefits that would relate to the Harlequins Centre proposals which were not relevant to that previous site. These can be summarised as:

- The proposals result in a 616% net gain in Biodiversity as a result of the proposals, creating additional habitat for a range of species through the provision of a Green Roof and Wall, as well as substantial enhancements to open space within the site.
- Creation of a pocket park for the enjoyment of all within the city.
- Significant improvements to the urban realm of Paul Street, reducing the presence of the car and enhancing the environment for pedestrians and cyclists.
- Provision of over 200 cycle parking spaces within the buildings and within the public realm.
- Replacement of the pedestrian bridge over Paul Street with a modern, lightweight bridge, reducing impact along the street as well as retaining access.

4.140 The harm which is identified in the heritage assessments is considered to be justified by the compelling and wide-ranging benefits of the application set out above. These substantial benefits therefore constitute the “clear and convincing” justification required by para 194 of the NPPF. It is therefore considered that these benefits should be given significant weight in the decision-making balance, such that they clearly outweigh any harm caused to heritage assets and the applicant invites the Council to come to the same conclusion in its assessment of the application in line with para 196 of the NPPF.



## 5 Conclusion

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- 5.1 This Planning Statement has been prepared to accompany the submission of amended plans for application 19/01556 which relates to the redevelopment of the Harlequins Centre, Paul Street, Exeter.
- 5.2 The amended plans address objections made to the original plans by residents, statutory consultees and officers of the council. The amended plans are described in detail in the supporting documents which accompany them and are analysed in detail in the supporting statements and reports.
- 5.3 This Planning Statement sets out how the proposals, as amended, meet the policies of the Development Plan and demonstrates how the benefits of the scheme in delivering homes, hotel accommodation, public realm enhancements and investments in the local economy (in the short and long term) through the reuse of a previously developed site within a sustainable location, clearly justify any harm caused to the heritage assets and more widely mean the Council should conclude that the benefits outweigh the limited harm which has been identified either to heritage assets, the landscape or to neighbouring properties.
- 5.4 It is therefore considered that the benefits of the proposals should be given significant weight in decision making and that the proposals are in line with the Development Plan and relevant material considerations and that therefore they should be supported by the Council and approved.

## Appendix A– Amended Application Documents

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### **Amended Plans**

EHQ-LHC-ZZ-XX-DR-L-02.01 GA Plan (C06)

EHQ-LHC-ZZ-XX-DR-A-01.10-Proposed Site Key Plan-(C02)

EHQ-LHC-ZZ-XX-DR-A- 01.07 - Proposed Illustrative Roof Plan (C05)

EHQ-LHC-ZZ-XX-DR-A- 01.06 - Proposed Illustrative Coloured Site Plan (C05)

EHQ-LHC-EX-ZZ-DR-A-04.16-Illustrative Coloured South-North Elevation

EHQ-LHC-ZZ-ZZ-DR-A-04.16-Block 2 Indicative 3D Views\_Sheet 2-(C03)

EHQ-LHC-ZZ-ZZ-DR-A-04.15-Block 2 Indicative 3D Views\_Sheet 1-(C03)

EHQ-LHC-ZZ-ZZ-DR-A-04.14-Block 1 Indicative 3D Views\_Sheet 2-(C02)

EHQ-LHC-ZZ-ZZ-DR-A-04.13-Block 1 Indicative 3D Views\_Sheet 1-(C03)

EHQ-LHC-ZZ-ZZ-DR-A-04.12-Site-Wide Indicative 3D Views-(C03)

EHQ-LHC-ZZ-ZZ-DR-A-04.11-Proposed NE and NW Elevations-(C04)

EHQ-LHC-ZZ-ZZ-DR-A-04.10-Proposed SE and SW Elevations-(C04)

EHQ-LHC-ZZ-ZZ-DR-A-03.12-Proposed Site Sections C-C, D-D and E-E-(C02)

EHQ-LHC-ZZ-ZZ-DR-A-03.11-Proposed Site Sections A-A and B-B-(C02)

EHQ-LHC-ZZ-ZZ-DR-A-03.10-Proposed Site Sections 1-1 and 2-2-(C02)

EHQ-LHC-ZZ-ZZ-DR-A-06.07-3D-Computer-Generated-Image-(C03)

EHQ-LHC-ZZ-ZZ-DR-A-06.06-3D-Computer-Generated-Image-(C03)

EHQ-LHC-ZZ-XX-DR-AR-06.03-Solar Study-Revised (Current) Proposed

EHQ-LHC-ZZ-XX-DR-AR-06.02-Solar Study- Existing

EHQ-LHC-ZZ-XX-DR-AR-06.01-Solar Study- Comparative

EHQ-LHC-XX-XX-DR-AR-97.01-Indicative Information Kiosk Layout-(C02)

EHQ-LHC-XX-XX-DR-A-03.04-Footbridge Sections-(C02)

## **Landscape**

EHQ-LHC-ZZ-XX-DR-L-93.40 Indicative Insect Hotel to Green - Brown Roof C02

EHQ-LHC-ZZ-ZZ-DR-L-94.01 Softworks Plan (C05)

EHQ-LHC-ZZ-XX-DR-L-94.02 Rooftop Softworks Plan (C04)

EHQ-LHC-ZZ-XX-DR-L-93.01 Hardworks Plan (C05)

EHQ-LHC-XX-XX-L-93.20 Landscape Details (2 of 2) C03

EHQ-LHC-XX-XX-DR-L-93.10 Landscape Details (1 of 2) C03

EHQ-LHC-XX-DR-L-93.30 Stumperry Detail to Habitat Pocket Park C02

## **Block 2**

EHQ-LHC-02-ZZ-DR-A-04.04-B2 North East Elevation-(C02)

EHQ-LHC-02-ZZ-DR-A-04.03-B2 North West Elevation-(C03)

EHQ-LHC-02-ZZ-DR-A-04.02-B2 South West Elevation-(C02)

EHQ-LHC-02-ZZ-DR-A-04.01-B2 South East Elevation-(C02)

EHQ-LHC-02-ZZ-DR-A-03.08-B2 Section E - E-(C03)

EHQ-LHC-02-ZZ-DR-A-03.07-B2 Section D - D-(C03)

EHQ-LHC-02-ZZ-DR-A-03.06-B2 Section C - C-(C03)

EHQ-LHC-02-ZZ-DR-A-03.05-B2 Section B - B-(C03)

EHQ-LHC-02-ZZ-DR-A-03.04-B2 Section A - A-(C03)

EHQ-LHC-02-ZZ-DR-A-03.03-B2 Section 3 - 3-(C03)

EHQ-LHC-02-ZZ-DR-A-03.02-B2 Section 2 - 2-(C03)

EHQ-LHC-02-ZZ-DR-A-03.01-B2 Section 1 - 1-(C03)

EHQ-LHC-02-R-DR-A-02.12-B2 Roof Plan-(C02)

EHQ-LHC-02-LGF-DR-A-02.02-B2 Car Park Plan-(C03)

EHQ-LHC-02-G-DR-A-02.03-B2 Ground Floor Plan-(C03)

EHQ-LHC-02-05-DR-A-02.08-B2 Fifth Floor Plan-(C03)

EHQ-LHC-02-04-DR-A-02.07-B2 Fourth Floor Plan-(C03)

EHQ-LHC-02-03-DR-A-02.06-B2 Third Floor Plan-(C03)

EHQ-LHC-02-02-DR-A-02.05-B2 Second Floor Plan-(C03)

EHQ-LHC-02--02-DR-A-02.01-B2 Entrance Levels Floor Plan-(C03)

EHQ-LHC-02-01-DR-A-02.04-B2 First Floor Plan-(C03)

**Block 1**

EHQ-LHC-01-ZZ-DR-A-04.06-B1 Colonnade Elevation-(C02)  
EHQ-LHC-01-ZZ-DR-A-04.05-B1 S-E 2 and N-W 2 Elevations-(C02)  
EHQ-LHC-01-ZZ-DR-A-04.04-B1 South West Elevation-(C02)  
EHQ-LHC-01-ZZ-DR-A-04.03-B1 North West Elevation-(C02)  
EHQ-LHC-01-ZZ-DR-A-04.02-B1 North East Elevation-(C02)  
EHQ-LHC-01-ZZ-DR-A-04.01-B1 South-East Elevation-(C02)  
EHQ-LHC-01-ZZ-DR-A-03.04-B1 Section D-D-(C02)  
EHQ-LHC-01-ZZ-DR-A-03.03-B1 Section C-C-(C02)  
EHQ-LHC-01-ZZ-DR-A-03.02-B1 Section B-B-(C02)  
EHQ-LHC-01-ZZ-DR-A-03.01-B1 Section A-A-(C02)  
EHQ-LHC-01-ZZ-DR-A-02.13-Plan Regions-(C02)  
EHQ-LHC-01-UGF-DR-A-02.03-B1 Upper Ground Floor (Mezzanine) Plan-(C03)  
EHQ-LHC-01-LGF-DR-A-02.01-B1 Lower Ground Floor Plan-(C03)  
EHQ-LHC-01-GF-DR-A-02.02-B1 Ground Floor Plan-(C03)  
EHQ-LHC-01-06-DR-A-02.09-B1 Roof Plan-(C03)  
EHQ-LHC-01-05-DR-A-02.08-B1 Fifth Floor Plan-(C03)  
EHQ-LHC-01-04-DR-A-02.07-B1 Fourth Floor Plan-(C03)  
EHQ-LHC-01-03-DR-A-02.06-B1 Third Floor Plan-(C03)  
EHQ-LHC-01-02-DR-A-02.12-B1 Second Floor Plan - Sheet 2 of 2-(C03)  
EHQ-LHC-01-02-DR-A-02.05-B1 Second Floor Plan - Sheet 1 of 2-(C03)  
EHQ-LHC-01-01-DR-A-02.11-B1 First Floor Plan - Sheet 2 of 2-(C03)  
EHQ-LHC-01-01-DR-A-02.04-B1 First Floor Plan - Sheet 1 of 2-(C03)

## **Highways**

0779-PHL-101-I Paul St Streetscape

0779-GA-102-D North St Paul St Highway GA

0779-GA-101-C Queen St Paul St Highway GA

0779-ATR-108-A Paul St Queen St Bus tracks

0779-ATR-107-C Paul St Queen St Fire Tender Tracks

0779-ATR-106-B Guildhall access tracks

0779-ATR-105-E Paul St Queen St Artic Tracks

0779-ATR-104-A Service bay artic tracks

0779-ATR-103-C Service bay refuse tracks

0779-ATR-102-C Basement Tracks

**Supporting documents**

Acoustic Tech Note May20

Air Quality Technical Note May20

Daylight Sunlight Report May20

Design and Access Statement Chapter 5 May20

Drainage Strategy May20 1of2

Ecology Update and Net Gain Calc May20

Economic Impact Assessment Addendum May20

Energy Statement May20

External Light Impact Assessment Update May20

External Lighting Strategy May20

Heritage Statement May20

Historic Environment Desk-Based Assessment Vol 2 Impact Ass May20

Historic Environment Desk-Based Assessment Vol 3 Non Tech Summary May20

Landscape Visual Assessment May20

Lighting Impact Assessment May20

Management Plan May20

Passivhaus Pre-Assessment Report May20

Planning Statement May20

Transport Assessment Addendum May20



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