



Historic England

Mr Howard Smith
Exeter City Council - City Development
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Direct Dial: 0117 975 0725

Our ref: P01565508

25 June 2024

Dear Mr Smith

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

**WATER LANE (SOUTH), EXETER
Application No. 23/1007/OUT**

Thank you for your letter of 22 May 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance of those affected heritage assets

The application site does not fall within a conservation area or contain any designated heritage assets. However, it does fall within the wider setting of Exeter City and its historic quay, and consequently, could impact on the significance these assets derive from their setting.

Historic England previously identified the potential impact of higher elements on the views appreciated from the grade II* listed by Colleton Crescent. On further review, it has become apparent that the kinetic experience along the train line from Dawlish to Exeter, which sits to the south-west of the site could provide impressive views towards the Cathedral and the city's skyline. This forms an important approach to the city, offering an elevation and undisturbed experience, enjoyed daily by large numbers of visitors.

Proposed Impacts

The application is outline only with all matters reserved except for access. The supporting documentation does, however, identify that the scheme proposes delivery for 900-980 homes with 36-40,000m² of employment use on Water Lane (South) only.



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Historic England previously provided advice on 29 September 2023.

The proposed amendments appear to remove the 12-storey element of the scheme and limit the height to a maximum of 8-storeys along the SW boundary of the site.

Although the 12-storey element has now been removed, the scheme would continue to propose height, massing and proportions in terms of the built form that would make it discordant with the predominant scale of development in southern Exeter, particular the historic Exeter quay. From a desk-based review, we also have concerns that the proposed scale and mass as shown in the building heights parameter plan could obstruct the kinetic views on the approach into city along the railway line up to the city and Cathedral, a key experience of the city.

Policy context

Any development will need to be considered under the NPPF, and we would highlight the following paragraphs as being relevant in that consideration -

- Para 201 and 206 identifies that opportunities should be sought to avoid and minimise conflict with the affected heritage asset. Only harm that has sought means to avoid and minimise can be considered as justified.
- Para 205 sets out that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- Para 208 explains that “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”.

Historic England’s Position

Water Lane is an allocated site within the extant local and emerging local plan with the application site forming only the southern extent of the wider site. The council is in the process of producing an SPD for the site as well as strategic assessment of views, heights and densities for the city, which will inform the emerging local plan.

We acknowledge the loss of the 12 storey elements and their impact on views from Colleton Crescent (Grade II*). However, we continue to have concerns regarding the scale and mass of the proposed development in term of its relationship with the surrounding built form. In addition, the proposed scale and massing could obstruct key views across to the Cathedral and City through the kinetic approach along the railway line.



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In our view, due to the sensitivity of the site and cognisant of the ongoing strategic study the council has commissioned, it would clearly be preferable that proposals and decision-making are informed by the outcome of ongoing research. This will help to inform the extent to which there may be views of the city skyline and cathedral across the application site, and wider strategic site, such as from the railway. An overarching master planning approach across the wider site that takes account of the findings of the study would also be of benefit. This would allow for consideration to be given to profiling of proposed heights and development locations within the site in order to minimise the impact identified.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

These concerns relate to the potential impact of the scale, massing and proportions of the proposed development that would be out of keeping with the character and predominant scale of in southern portion of Exeter. In particular, those views from Colleton Crescent and the kinetic experience along the train line.

Due to the ongoing strategic work that has been commissioned by the council, it would be preferable to await the findings of that work and plan for the site holistically, rather than in the proposed piecemeal approach. This will allow for opportunities to minimise the harm through delivery of the development across the site.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 205, 206 & 208 of the NPPF.

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

Yours sincerely

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Inspector of Historic Buildings and Areas

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