

Impact on Setting of Heritage Assets

Summary

The design of the proposed structures are contemporary and represent a significant addition to the cityscape in terms of mass and dominance. The proposed development will have an impact upon the setting of the designated and non-designated assets. The topography of the immediate environs of the proposed development serves to amplify that effect in some areas and diminish it in others. In the areas in which this effect is diminished the majority of assets will be experienced in a minimally altered context, with glimpsed views of the development. In areas where topography and proximity combine to amplify the effect, it is recognised that the proposed development will generate some harm to Heritage Assets. Any such harm must be acknowledged and measured against the value of the asset and any benefits the proposal will bring under wider policy requirements.

The proposal also has positive effects upon heritage; a section of nationally important scheduled City Wall will be stabilised and improved and the archaeological investigation will provide valuable new evidence about earlier occupation within the city. Additional public heritage benefits include the creation of an improved public realm in the Conservation Area partially by redevelopment of the current late 20th century shopping centre with higher quality structures, but more significantly by providing improved access to experience the city wall and the provision of interpretation to enhance public engagement with the monument.

Therefore, it is the opinion of the Exeter City Council Principal Project Manager (Heritage) that cumulatively the level of harm falls below the threshold of substantial as defined by national guidance; consequently the proposed development meets the criteria for approval under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act of 1990 on the basis that any permission be conditioned to secure the implementation of a programme of archaeological works and to obtain the positive enhancement of the Scheduled Monument by way of a S.106 agreement.

Policy Context

The proposed development is of significant height and mass and represents a distinct change to the cityscape, variously impacting designated Conservation Areas and the settings of numerous designated Listed Buildings along with the City Wall, a Scheduled Ancient Monument. The clear duty of Local Planning Authorities (LPAs) under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act of 1990, when making a decision on an application for planning permission that affects a listed building, is to “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The duty of LPAs under S 72 of the 1990 Act to pay “special attention ...to the desirability of preserving or enhancing the character or appearance of that area” when making planning decisions also applies. As the Conservation Areas are designated heritage assets under the NPPF it is also necessary to consider the impact of a proposed development on its significance and to “give great weight to the asset’s conservation” (NPPF para 193; see also saved local plan policies C1 & C2).

Exeter Central Conservation Area

The Exeter Central Conservation Area is predominantly commercial and institutional in character, with existing large buildings as a result. Some dominant buildings of substantial scale are important historic buildings such as the 1860s RAMM which are designated in their own right and which also contribute significantly to the character of the Central Conservation Area, other more recent additions to the townscape including the 1970s Guildhall Shopping Centre (GCS) are particularly dominant and overbearing, and detract from the character of the Conservation Area. The proposed

development is significantly higher and more dominant. Following consultation the revised scheme has a reduction in height and the treatment of the elevations has been readdressed to counter this effect, but the use informs the design and this proposal will inevitably result in block forms.

It is considered that the proposed development would cause a degree of moderate harm to the Conservation Area due largely to the scale of the development within the context of a predominantly 3 or 4 storey 19th century townscape; Bartholomew Street, Upper Paul Street and Queen Street would all be experienced in an altered context, albeit a context already compromised by the current modern structures which occupy the site. The dominance of the proposed development upon the immediate area has been ameliorated to some degree by the reduction in height, and the breaks in mass/form/materials secured during the design process. The harm to the remaining elements of the Conservation Area is for the most part subdued by the limited intervisibility, particularly due to the GSC, consequently the level of harm falls below the threshold of substantial and is acceptable within the National guidance framework.

St Davids Conservation Area

The predominant character of the St Davids Conservation Area is of a more domestic residential scale with some larger commercial institutional buildings (e.g. Dispensary, Elim chapel). There is a sharp boundary, marked by the city wall, between this and the larger scale commercial in the Central Conservation Area above. This is then a frontier of sorts between 2 contrasting character areas. The topography of the St Davids Conservation Area serves to amplify the adverse impact of the proposed development given the height of the proposed structure and the diminishing street levels. The mix of predominantly 18th and 19th century building stock in Northernhay Street makes a valuable contribution to the character of the wider area and would undoubtedly be adversely affected by the proposed development.

The historic buildings in Northernhay Street generally increase in height as the hill drops away, from two to three storey. This pattern would effectively block the visual impact of the proposal until breaks in the street frontage or roof height partially reveal the proposed development. The scale and massing of the proposed structures coupled with the proximity and topography would combine to produce a sense of dominance which is greater in this area than in other zones of influence. The existing Harlequin development has had a similar but reduced effect to the setting of the St Davids Conservation Area and the property boundaries to the rear are much denuded in terms of significance by consecutive piecemeal repair and development. Consequently the level of harm is considered to be moderate and falls below the threshold of substantial therefore meets the criteria for approval within the National guidance framework if it can be balanced against the wider planning guidance in terms of loss versus overall gain and harm versus public heritage benefit.

Exeter Cathedral and The Church of St Michael and All Saints (both Grade I)

Alterations or additions to the visual context of assets need to be carefully considered so as not to harm their setting under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act of 1990.

Historic England, as the responsible authority, have provided their own advice upon the effect of the proposal on the Scheduled Monument and the impact to Exeter Cathedral. It is important to note that Historic England advice should carry considerable weight in the planning process and the LPA concurs with Historic England in these matters.

The proposed development will not be visible from the immediate environs of Cathedral Square but longer views into and out of the city will be altered, most notably from St Davids, the Iron Bridge and some views toward The Church of St Michael and All Saints.

Visibility or change does not necessarily equate to harm. Exeter City Council considers that the scale/mass and siting of the proposed development will alter the city skyline, adding to the density and reducing breaks. The proposed development will not, however, introduce competing tower forms into long views of the Cathedral or the Church of St Michael and All Saints allowing the primacy of the City spires to remain iconic and a legible part of the skyline, and a seminal part of the cityscape. The harm to the assets therefore is considered neutral to slight.

City Wall (Scheduled Monument)

The City Wall defines the historic core of Exeter and has the highest designation and protection possible. The setting of the wall within the red line of the proposed development is currently much denuded, existing largely within the service area of the Harlequins Centre. The wall in this area is in poor condition and access is uninviting for the public. The setting of the wall is a material consideration in the Planning process and Historic England have already commented upon the proposals. Any proposal which affects the setting of a scheduled monument should seek to improve the setting rather than replicate any current harm. The proposal includes a commitment to deliver S106 funding for the conservation of the wall in the affected area, provision for an interpretation station and improved access for the general public to engage with their past. The immediate setting of the monument will be improved by soft landscaping and open design. The wider setting of the monument, most notably when seen from Northernhay Street, will be dominated by the proposed structures, reducing the ability of the viewer to appreciate the scale of the monument and denuding further the impact of the scale of the monument. The delineation of the wall will continue to be apparent and therefore the ability of the viewer to read the historic development of the city will remain unchanged. On balance the cumulative impact of the proposed development on the setting of the wall can be characterised as slight negative.

Grade II and II* Listed buildings affected by the proposed development

The proposed development has no physical impact upon a grade II or II* listed structure, therefore the following assessment is one of the impact upon the setting of these structures and the effect to their character through the proposed changes in their setting (with reference to section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act of 1990).

Exeter has a high proportion of designated Heritage Assets where the proposed development may be visible either in glimpsed seasonal views or as part of the wider cityscape. Views from a Listed Building are not protected under the 1990 Act therefore the following advice pertains to those assets which ECC believe will experience a measurable change in setting, either positive or negative which is a material consideration in the planning process.

The level of impact upon an asset has been assessed using the DMRB Vol.II section 3, part 2, HA 208/7 cultural heritage matrix in order that the applicants assessments can be directly compared using the same scale.

74 Queen Street, 75 Queen Street, 79 Queen Street, 80-82 Queen Street, 83 and 84 Queen Street, 89 Queen Street, Queen's Hotel (All Listed Grade II) and Higher Market Civic Hall (Grade II*)

These assets form a cohesive group and the effect upon them must be considered in these terms. The change of context will have a moderate adverse impact given the scale, massing and proximity of the proposed development however the collective scale and massing of the heritage assets will remain uninterrupted, and the legibility of the immediate street scene preserved. The reduction in

height of the proposed development has alleviated the dominance of the proposal to an acceptable level.

Therefore the impact of the proposed development on the significance of these Grade II and II* designated heritage assets is considered to be slight to moderate and the effect of the proposal upon them would create less than substantial harm to their significance.

25 Queens Street (Grade II)

The proximity, height, mass and design of the proposed structures will create an adverse effect upon the asset; the proposed structures will dominate and create a sense of intrusion, reducing the legibility of the roof lines and the group value of the long views. The dominating effect of the proposed structures has been lessened by the height reduction but the scale and mass of the proposed structures inevitably diminish the intended impact of the neo-classical frontage and therefore the significance of the asset.

The impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be moderate to substantial and the effect of the proposal upon it would create less than the refusal threshold of substantial harm to its significance.

1 Upper Paul Street and 2 Upper Paul Street (Grade II* and Grade II respectively)

The oblique angle of the proposed development when viewed from Upper Paul Street will produce a sense of enclosure which does not currently exist. The revised materials treatment helps to ameliorate the effect to a degree but the medium view will inevitably change. The effect to the setting of the listed buildings will be moderate overall but the immediate context is insulated by the proximity to the RAMM. The existing multi storey car park has compromised the views out to a greater extent and the softening of the proposed link bridge will diminish the dominance of existing structure.

Therefore the impact of the proposed development on the significance of these Grade II and II* designated heritage assets is considered to be slight to moderate (as the view broadens out) and the effect of the proposal upon them would create less than substantial harm to their significance.

RAMM Royal Albert Memorial Museum (Grade II)

This asset will continue to dominate the street scene of Queen St and of the top end of Paul St as it was intended to do. The proposed structures will only compete with the RAAM in visual terms when the latter is viewed from further down Paul St and produce a sense of enclosure which is not currently present; whilst this represents a change to the wider context of the asset it does not represent significant harm as the effect is limited to a single viewpoint past which the asset is experienced in its immediate and intended environs. There is no view of the RAMM from Bart St or Paul St above or beyond the Harlequins at present.

Therefore the impact of the proposed development on the significance of the Grade II designated heritage asset is considered to be slight to moderate and the effect of the proposal upon it would create less than substantial harm to its significance.

Exeter Dispensary (Grade II)

Given the location as a corner plot this asset will experience a significantly higher impact. The longer context views would be intruded upon, adversely affecting the asset when viewed from within its wider setting. The overpowering effect of the proposed structures immediate proximity view has been lessened by the height reduction but the scale and mass still has a negative impact in terms of a dominating effect, most noticeably in the approach view from the north.

Therefore the impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be moderate and the effect of the proposal upon it would create less than substantial harm to its significance.

Gate Piers to Easton's Marble Works (Grade II)

These listed gate piers exist in isolation, severed from their original context but retain an evidential/amenity value and add character to the street scene. The dominance of the proposal will significantly alter the area in which they are experienced but the harm is considered to be slight given the characteristics above.

Therefore the impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be slight and the effect of the proposal upon them would create less than substantial harm to their significance.

39 Northernhay Street (Grade II)

The orientation of this property makes it more sensitive to the proposed development than the neighbouring properties. The effect will be one of dominant juxtaposition and will inevitably create harm to the setting of the listed building; and by doing so diminish the significance of the asset. The existing development has already created this effect to some degree but the increase in scale and mass will exacerbate the level of harm from slight to one of moderate to substantial.

The impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be moderate to substantial and the effect of the proposal upon it would create less than substantial harm to its significance

42 Northernhay Street (Grade II)

The open aspects of the property defines the setting to a large extent, this early 19th Century Townhouse has a commanding presence within the streetscape due to its height and isolation in a relatively enclosed situation. This effect will be significantly diminished by the proposed structures which will dominate the rear of the property; however the context is already compromised by the existing Harlequins development and therefore harm already exists; the proposal would represent an increase in that level of harm to one of moderate to substantial.

Therefore the impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be moderate to substantial and the effect of the proposal upon it would create less than substantial harm to its significance.

8 Northernhay Street, 2-7 Northernhay Street and 1 Northernhay Street, 2 Northernhay Square (all Grade II) and 13, 17, and 18 and 46 also The River (Former Elim Providence Chapel) All Locally Listed

Northernhay Street and elements of Northernhay Square are likely to experience the greatest changes in setting given the topography and proximity to the proposed development. The individual properties each possess a diminutive domestic character which collectively contribute to the street scene. The individual and group values along the street will remain legible, although the juxtaposition of the historic and modern will undoubtedly create a sense of dislocation, however the existing adjacent modern developments already delineate a clear boundary between the historic and the new. The scale and mass of the proposal will amplify that dislocation and alter the way each of these assets is experienced to a certain degree, but it is recognised that the wider context of Northernhay Street and its listed properties is a frontier between a domestic scale extra mural suburb and an evolving city centre with larger scale and predominantly commercial buildings.

Therefore the impact of the proposed development on the significance of these Grade II designated and locally listed heritage assets is considered to be moderate and the effect of the proposal upon them would create less than substantial harm to their significance.

Maddocks Row Arch (Grade II)

This 18th century archway retains an evidential and amenity value and adds character and context to the pedestrian way. The dominance of the proposal will significantly alter the context in which the structure is experienced when viewed from Northernhay Street however the Arch leads into the Harlequins marshalling yard and the context is lost at this point. The proposed development will create a higher amenity value area for the heritage asset, improve access and consolidate the fabric of the extended wall section that the Listed structure shares.

Therefore the impact of the proposed development on the significance of this Grade II designated heritage asset is considered to be slight and the cumulative effect of the proposal upon it would create less than substantial harm to its significance.

Rougemont Hotel (Locally Listed)

The Rougemont Hotel is a dominant form in Queen St and is insulated from the proposed development to an extent by the intercession of the intervening structures along Queen Street. The proposed structures will compete in terms of height and mass when viewed from the junction with Paul St but the street scene will remain legible and proposed materials will serve to ameliorate the effect to an acceptable level. The immediate setting of the asset will remain unaltered; consequently the harm to the setting of this heritage asset can be characterised as neutral to slight.

Therefore the impact of the proposed development on the significance of this locally Listed asset these is considered to be slight and the effect of the proposal upon it would create less than substantial harm to its significance.

Old Malthouse Restaurant, Bartholomew Street East (locally Listed)

The Old Malthouse sits within the immediate context of an industrial post war streetscape, the proposed development will add mass to the views into the city and will serve to isolate the asset further from the historic core. The proximity to the development will lessen the effect to some degree but the proposed materials treatment of the development will amplify the dominance of the façade facing the Malthouse and consequently the harm to the extended setting of the asset is assessed as slight to moderate.

Therefore the impact of the proposed development on the significance of this locally Listed asset these is considered to be slight to moderate and the effect of the proposal upon it would be to create less than substantial harm to its significance.

9-12 Lower North Street, 13 Lower North Street, 15 -17 Lower North Street, 1-3 Iron Bridge, City Gate Public House and Hotel and St Anne's Well Brewery (all Grade II)

The individual listed properties are of mixed use and the impact of the proposed development will alter the context of the wider street scene in places where the proposal can be viewed. The effect diminishes past no 9 as the proximity to the development recedes.

Longer views from Iron Bridge and St Annes Well Brewery reduce the sensitivity of the assets to change and the individual and group values of the structures remain legible. The setting of the City Gate Public House and Hotel has been compromised by the new development directly opposite and the creation of the multi storey car park on the busy junction adjacent to it. The asset makes a

significant contribution to the character of Iron Bridge in terms of a gateway property, and is effectively screened from the proposed development by the new builds around it. Past that gateway the context is lost and consequently the development will have a neutral effect.

Therefore the impact of the proposed development on the significance of these Grade II designated heritage assets is considered to be neutral to slight and the effect of the proposal upon them would create less than substantial harm to their significance.

NORTHERNHAY AND ROUGEMONT GARDENS NHLE HE List Entry No: 1001631 Registered Park & Garden

The effect upon the setting of the asset varies from no effect to slight; this is dependent upon the position of the viewer within the Park. The viewpoint analysis suggests that where the proposed development is visible, the alteration to the long view will be subsumed into the wider context and will not affect any current intervisibility which has a heritage value, nor would it detract from the amenity value of the asset. The harm to this asset is considered slight.

Therefore the impact of the proposed development on the significance of the Registered Park and Garden is considered to be slight and the effect of the proposal upon it would create less than substantial harm to its significance.

41 & 42 Mount Dinham (Grade II)

The effect upon the setting of these assets varies is characterised as slight; the immediate domestic setting of the assets will remain unaltered with the proposed development visible in the longer views out toward the cityscape, the changes to the long view will be subsumed into the wider context of commercial blocks, however the increase in the density of the long view will have a slight negative effect upon the significance of the asset.

Therefore the impact of the proposed development on the significance of these Grade II designated heritage assets is considered to be slight and the effect of the proposal upon them would create less than substantial harm to their significance.

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