

28th July 2020

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BY EMAIL ONLY

Our ref 0061/Outgoing

Dear Matt,

Harlequins Centre – 19/1556/FUL. Further Amended Plans

Following further discussions regarding our client's application, we are submitting further amended plans in regard to application 19/1556/FUL.

The further amended plans have been submitted via the Planning Portal and the changes are documented fully in a separate Addendum to the Design and Access Statement. In brief the amendments involve the removal of accommodation from the upper floors of both blocks of accommodation and amendments to the facades of both buildings. The result will be a total of 251 co-living bedrooms in Block 1 and 116 hotel bedrooms in Block 2.

The changes come following further discussions with officers of the council and notably representatives of Historic England. Their letter of the 22 June has been carefully considered and has been central to the further amendment of the application, though this clearly (by removing further areas from the buildings and thereby reducing their height) also addresses some of the points raised by other commentators.

The planning application, as submitted in November 2019 and the amended plans submitted in May 2020, were both accompanied by substantial documentation setting out the implications of the development on the whole range of aspects we might expect. The further amended plans address specific points regarding the height of the building and its appearance and as such a further suite of documents is not included with this submission. However, the following sections consider the implications of the further amendments against each of the disciplines which have been previously assessed.

Acoustics

An Acoustic Design Statement accompanied the original application and a Technical Note was prepared in conjunction with the amended plans in May 2020. The further amended plans do not impact on the findings of this work and the impacts will remain as previously documented. If permission were to be granted, a condition will, we assume, be imposed which includes noise emission criteria to be complied with.

Air Quality

The impacts of development on air quality were set out in an initial Air Quality Assessment and updated in an Addendum, issued in May 2020. The further amended plans remove accommodation from both buildings and also reduce the overall height of Block 2. In terms of air quality the main implication of this is the reduction in the stack height for the CHP plant provided for Block 2. This will be reduced by 3m due to the reduction in height of the building. Discussion with the council's Environmental Health Officer (EHO) confirm that this would not result in a significant change in emissions and the impacts would remain negligible.

Daylight and Sunlight

As part of the amended plans submitted in May 2020 a full Daylight and Sunlight report was submitted, assessing impacts utilising the BRE guidelines. This showed that for the vast majority of rooms there would be no impact on sunlight or daylight. There was shown to be a small impact on certain rooms as a result of the development, but this was considered, in the context of the guidelines, to be an acceptable impact.

The removal of floorspace at the upper levels of both blocks will not worsen the daylight and sunlight amenity results. The results will change for some of the adjoining properties, but the changes will constitute improvement in daylight and sunlight levels. Therefore, as the previous results were considered to be acceptable, the full assessment has not been revised for the further amended plans.

Drainage Strategy

The proposals have no implications for the drainage strategy as the floorspace reduction does not alter the footprint of the building, nor the approach to surface water drainage, including the provision of green/brown roofs.

Ecology

The proposals result in an overall net biodiversity increase of over 600% and the further amended plans do not impact on this. Therefore a further assessment has not been undertaken for this submission.

The RSPB have raised comment in regard to the distribution of bird boxes across the scheme and we have agreed that the proposed location of the boxes can be amended. RSPB have not provided any detail as to their preferred location of boxes and so we suggest that this is addressed by condition, confirming that the boxes are to be provided and can be subject of agreement with the council prior to commencement on site.

Economic Impact

The proposals, if permitted and constructed, will have a significant economic benefit for the city of Exeter. This was documented in an Economic Impact Assessment submitted with the original application and updated in an Addendum with the revised proposals in May 2020.

The further amended plans would still see substantial economic benefits, which fit with the strategic objectives for the area. In summary, these are as follows:

- Approximately £33.5m of direct investment in delivering the proposed development
- A combined expenditure of £8.3m per annum from residents and visitors
- Support for 116 (gross) jobs, of which 52 are estimated to be net additional jobs in the local economy
- A gross value added (GVA) to the local economy of circa £2.3 million per year in increased output

Energy

The further proposed amendments reduce the scale of each building, but this does not have a material impact on the energy need nor on the strategy to be adopted. The original energy statement was amended in May 2020 to reflect the proposed changes at that time. However the statement has not been amended in this instance, as the changes are considered minor in terms of energy demand and supply.

External Lighting

Lighting impact assessments were submitted with the original application and the revised plans in May 2020. This demonstrated that the maximum building illuminance will be well within the guidance levels and as such it was agreed by the Council's EHO that the impacts were acceptable but that a condition should be imposed to require submission of the final lighting design and its agreement prior to commencement.

The further amended plans do not significantly alter the lighting impact and as such it is considered that the scheme remains acceptable in this regard. It is anticipated that, should permission be granted, a full lighting design will be required by condition which will ensure suitable control for the council.

Heritage

The heritage of the site and its surroundings have been a key consideration of the application preparation and subsequent amendment. A Historic Environment Desk-Based Assessment was prepared well in advance of the application and guided the development of the proposals prior to the public consultation in summer 2019 and the application itself. Volume 2 accompanied the application and considered the impacts of the proposed development, with Volume 3 being submitted in May 2020 in response to points raised during the initial consultation phase.

The further amended plans specifically address the points raised by Historic England in their letter of the 22 June 2020. As set out in the design note produced by LHC to accompany this pack of material, the façade changes and removal of accommodation specifically address the points raised and it is anticipated will enable HE to remove their objection to the application.

The HDBA Volume 2 and the Heritage Statement prepared by Turley in May 2020 both assess the impacts of development and concluded 'less than substantial harm' to a number of heritage assets. Less than substantial harm remains, but the level of harm has been reduced as a result of the latest amendments.

The Historic England (HE) letter of 22nd June essentially raised three areas of concern which are addressed below:

Massing, Scale and Modulation

HE identify two elements of the building which they consider should be reduced in order to overcome their remaining concerns about the impacts on heritage assets within their remit. The further amended plans remove both elements of the building, as requested by HE.

The letter also considers the external elevations of the building and the further amended plans address this through amendments to the façade of the buildings and the extension of public art elements at street level to provide interest and avoid blank facades at this level. These are documented in more detail in the Addendum to the Design and Access Statement submitted with these amended plans.

Below ground archaeological remains

In the Historic England letter of the 22nd June, their officers consider additional targeted archaeological work should be required on the site prior to determination. Noting that a brief interpretative review of a limited programme of geotechnical boreholes from 2019 is awaited and will be submitted, we do not agree with this statement. This point has already been fully discussed in Volume 3 of the Heritage Desk-Based Assessment. This has subsequently been again discussed with the council's heritage specialist (as suggested in the HE letter of the 22 June) and it has been agreed with him that further geoarchaeological work now would not be reliable or useful because of the complexity of urban stratigraphy, following the specialist advice of Dr Nick Watson of Winchester University. Therefore, we propose that further investigations to inform detailed design and construction, and archaeological responses, should be the subject of a condition, and works undertaken as part of implementing any permission.

Scheduled wall

The city wall has been an important consideration throughout the preparation of the application. However it should be noted that the wall is not within the application site and is not within the ownership of the applicant. However, it is clear that the conservation of the wall is an important element for the site and the wider city. It is also the case that the wall is, in places, in poor or deteriorating condition and this is already the case, prior to any development of the Harlequins Centre

The proposal for the redevelopment of the Harlequins centre will bring significant benefits for the wall and its setting. Currently the wall is located within a service yard at the back of the site, a setting which does not reflect its importance. The proposal will enhance that setting through careful design and landscaping, enhancing the view of the wall.

However, HE raise important concerns regarding the fabric of the wall itself. These fall into two elements, firstly the short term implications of the construction phase and secondly the long term implications of the change in setting and how this might impact the fabric of the wall in the long term.

Following receipt of the letter in June, discussion have been held with HE and further studies commissioned in order to assess the current state of the wall itself. These studies are ongoing and will be shared with HE and the City Council as they are completed. These studies will form the basis for conservation plans going forward and, should permission be given, it is anticipated that conditions will be imposed to ensure that works are carried out, where appropriate. In the short term this will be set out in a Construction Management Plan (CMP) which will control works through the construction phase.

Landscape Visual Assessment

A key element of the evidence supporting the application is the LVIA which was submitted with the original application and has been extended since so that the fully body of work now encompasses more than 45 viewpoints in total.

The LVIA has been produced in line with a strict methodology, which has been questioned by some objectors and, to provide clarification, the methodology is included as Appendix 1 with this letter.

The LVIA has been supplemented with additional viewpoints, night-time views, winter views, 3D views and CGIs in order to provide a clear understanding of the proposals and their impacts for all parties.

Updated images are being produced of those views which have been altered by the further amended plans and these will be issued in the next few days. The extent of these views has been agreed with officers of the council and Historic England and include additional views from sites close to the application site itself.

In order to provide even further clarification of the proposals, it is proposed that balloons will be flown at the site, demonstrating the height of the proposed buildings. This will be undertaken at the end of the week, assuming that the weather permits. .

We therefore believe that, with all of this information, the proposals can be clearly understood and assessed by all parties.

Management

A management plan for the Co-living block was submitted within the original application and amended in May 2020. None of the further amendments to the plans will impact on the proposed management of the building and therefore a further iteration of the management has not been necessary.

There have been objections submitted in regard of the application which question whether, with the advent of Covid-19, we should be designing and building high density accommodation at all. The opponents suggesting that the small personal spaces and shared facilities will be a potential breeding ground for future outbreaks.

It is interesting to note that, as lockdown lifts, we are seeing a significant interest in not only houses with large gardens in the countryside but also a shift to Private Rented (known generally as PRS) accommodation. This is generally from young people (and their parents) seeking good quality accommodation which is managed. This is because the alternative for these people is not a house in the suburbs but a room in a shared house (or HMO). For people in these forms of accommodation the lock down has been very difficult and the prospect of moving to a good quality managed accommodation block is very attractive.

In the advent of a further pandemic, a co-living block such as at the Harlequins, would have a management team dedicated to ensuring the safety of residents and would work with the resident community to put in place measures around social distancing. This is not possible in a shared house, where the residents are left to their own devices. Therefore, for the future management will be critical for accommodation and the proposals set out clearly how the building, if approved, would be professionally managed.

Passivhaus

Block 1, the Co-living building has been designed to Passivhaus Principles and the changes to the scheme do not change this approach. Therefore, the Pre-Assessment Report issued in May 2020 remains appropriate to the proposals and has not been amended to reflect the further amended plans.

Transport

The further amended plans result in no additional impacts in regard to highways and transport. There have been no other changes to the proposals since the submission of the amended plans and as such changes to the Transport Assessment Addendum, dated May 20, have not been necessary.

During the previous weeks an agreement has been arrived at in principle for the provision of a co-bikes stand as part of the proposals. The exact location of this stand, for 10 bikes, is to be confirmed at detailed design stage, in conjunction with the highways authority.

Conclusion

The further amended plans provide yet further changes to the proposed scheme, reflecting comments made by officers and others in the assessment of the application. As we have done throughout the process, we have listened to comments and made amendments where possible to reflect concerns. We assume that the further amendments will now be subject of another round of public consultation and we look forward to discussing this further with you and progressing to a committee for final determination.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Dadds". The signature is written in a cursive style with a large initial "C".

Chris Dadds

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Enc. Appendix 1 Illustrative Photomontages Methodology