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City Development

Exeter City Council

Civic Centre

By email

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Dear Mr Cummings,

Application 25/0895/FUL and 25/0896/LBC. Site of Royal Clarence Hotel, Cathedral Yard

Redevelopment of the Royal Clarence, to include 25 new residential dwellings on the upper floors with part residential on the ground and part basement floor. Commercial on the remaining ground and basement floor as a public house and restaurant.

The Planning Group of Exeter Civic Society has considered this application and comment as follows:

We are pleased that a new developer is pressing ahead with preparatory work to redevelop this abandoned site, and to re-establish a building which will reinstate the grandeur of Cathedral Close. We were grateful to be able to provide feedback to their previous consultation.

We hope that you will be able to agree amendments to this new application with the applicant based on important comments submitted by respondees who are making reasonable suggestions to improve the final development, and to help preserve what remains of these very historical, but damaged listed buildings.

We are grateful to Historic England, SPAB and Devon Buildings Group for their very informative responses to this application and description of the amount of historical building fabric that survived the fire, and their call for its preservation in-situ rather than its removal.

The subsequent revised proposals are welcome, although we have concerns about the lack of detail provided for the Listed Building Compliance application, which provides no further information than the substantive planning application.

Listed Building Consent.

We cannot see how listed building consent can be granted without a significant amount of additional information to demonstrate how a concrete frame can sit alongside either the timber frames of 16 & 17 Cathedral Yard or historic fabric that survives throughout the site. However, we

are aware that for such a complex building project may require decisions to be made as work progresses. We assume you will use planning guidance in determining appropriate conditions. This is what the English Heritage guidance says about the use of conditions on Listed Building Consent applications.

"The use of conditions

39. Conditions can, as the PPG points out, anticipate the requirement of information at a later stage in a project, thus saving time in the application process. They should be kept to a minimum and only imposed where they are necessary, precise and reasonable – see the PPG section on the Use of Planning Conditions. However, the local planning authority must always be satisfied that it has adequate information to assess the effect of proposed works on the listed building before granting consent: the extent of the work, the method to be used, and the materials involved are all important. For instance, some traditional materials, such as some building stones and roofing slates, are no longer available or have a longer lead-in time for delivery. Addressing the issue of appropriate materials to be used as part of the application, rather than by later conditions, can help avoid a situation where work is already underway before it is realised that the hoped-for material is not available, avoiding delays and extra costs, and perhaps even forcing a re-think about alternative materials which may have a greater impact on special interest than was originally expected.

40. Conditions are therefore generally used for procedural matters, for safeguards and for the provision of details of proposals: „Examples of procedural conditions include limiting the time allowed for the works (usually three years) or restricting premature demolition.

„Safeguarding conditions include those requiring the submission of a schedule of works or a method statement; or for the preservation of certain features; for the carrying out of works in a particular way, such as removing old pointing by hand; for temporary structural support; for the protection of architectural features during works; or for recording features due to be altered or demolished. In some cases, where an approach has been agreed, it may be useful to approve details later, such as details of external and internal joinery, or details of new services.

„Conditions may also be varied where circumstances have changed, for instance where better solutions for the treatment of the building emerge or because features of interest, previously unsuspected, have been revealed since work started."

We suggest that the following matters need to be addressed.

- The Heritage Statement has not been updated since it was produced in February 2025. Chapter 7 describes the impact of some of the works but falls short of providing detail about how remaining fabric will be affected by the works to rebuild.
- We suspect that a concrete frame will require columns or intrusion into the existing walls for support, but no detail is provided of how the historical walls will be impacted to give support.
- The plans submitted for the LBC show little differentiation between remaining fabric and new – improved plans should be submitted.
- The floor plans should show the structure below to help understand where this is being used for support unless this can be shown via sections.

- The plans do not show how the retained walls of 16 & 17 Cathedral Yard will be retained or utilised, including how a steel frame may be inserted – this must be made clearer. In addition, new or existing walls and floors will need to be made sound and fire proofed – how will this affect the historic structure?
- It is proposed to remove part of the roof of 16 & 17 Cathedral Yard but the extent or detail is not clear. In removing this, should a detailed record of the structure be made?

Ground Floor

The ground-floor front door to the residential units has now been repositioned to use the building's original hotel portico, creating a more structured and formal arrival experience that re-establishes a sense of destination and prestige.

By contrast, the proposed entrance—accessed via a long narrow corridor—feels inconsistent with the building's character and represents a missed opportunity to restore the grandeur and formality of the original approach. Furthermore, the decision to conceal the medieval spine walls—features that could have served as a natural divider between the commercial and residential areas—is unfortunate. As a result, the commercial unit now appears to encroach upon and visually dominate the residential entrance, undermining the intended balance between uses.

First Floor and Above

The central light well has been enlarged and it is questionable whether this provides much beneficial daylight, particularly at the lower levels of the building. It still appears as a token gesture, awkwardly configured to accommodate the maximum number of apartments. Its position—spanning across the spine walls—does not reflect the arrangements indicated in the design and access statement of 2022, and fails to respect the heritage building's historic layout and envelope. It is regrettable that a more thoughtful and contextually sensitive approach was not adopted. A similar number of units could have been achieved while preserving the architectural integrity of the building.

At the rear, the plan form has been reversed to create a courtyard and central light well dominated by the main staircase. While this design choice is not ideal, it can be reluctantly accepted.

Roof Level

The roof level largely follows the form of the previously permitted scheme, and now has additional notes of the ASHP units and proposed solar panels.

ASHP Units:

The inclusion of ASHP units represents a departure from the intended connection to the forthcoming District Heating system, as outlined in the Decentralised Energy Network strategy, which identifies this building as one of the required connections. Their omission would bring notable advantages, including the removal of roof plant and the creation of additional space for

solar panels. But without the provision of sections it is impossible to determine whether the ASHP will be seen or whether a noise buffer will be used to prevent noise pollution to neighbouring properties.

Solar Panels:

At present, solar panels are referenced only as a note, with no accompanying layout or specification. As such, it is impossible to assess their efficiency, visual impact, or contribution to the building's energy performance. A detailed plan and supporting analysis should be submitted to demonstrate how the proposed panels will meaningfully contribute to reducing the building's environmental footprint, rather than serving merely as symbolic features.

Appearance

We accept that the elevations to the Cathedral Close and Martins Lane are substantially as the 2022 approved scheme and hope that upon completion of the redevelopment the building will restore the building to its original appearance, save for changes to 6 Martins Lane.

We object to the design of the rear and Lamb Alley elevation because they are insensitive - as in the previous application. Although this approach was accepted in the earlier permitted scheme, it continues to diminish the overall architectural quality of the proposal. Its monotonous and uniform treatment detracts from the surrounding context and adversely affects long-distance views - although we are not sure if the applicant has submitted long distance views of the rear of the now higher building. The rear of the building will be seen from the rear of the listed High Street buildings, the upper floors of which could be developed to their former residential use. The rear of the building should be redesigned to reflect the rear of buildings from this era – rendered. We also object to the use of grey windows to the rear elevation- these should be white to reflect painted wooden windows from the era of the listed buildings in the area. It should also be noted that in conservation areas the installation of windows other than timber is usually discouraged. The rear elevation shows an additional window to that approved under 22/2236 - the impact of this on the nearby buildings should be demonstrated – is the distance to windows at the rear of the High Street buildings the recommended 20m? **The applicant should provide diagrams to demonstrate views to the neighbouring buildings and if intrusion, make adjustments to the style of the windows.**

Aspects of Detail.

1. The application lacks sufficient detail with no sections to demonstrate heights and methods of construction, even though section lines are shown on the plans. In addition, there are no elevations of the exterior of the side walls to the light well. **As this is both a listed building and in a conservation area additional information must be submitted urgently to help the LPA make a complete assessment of the proposals.**
2. The application suggests that parts of the basement will be filled in therefore making the remaining historic structure 'underground' but has not provided any information about the need to tank/waterproof the structure, or the need for additional structure to prevent the existing walls collapsing once they become retaining walls.

3. Page 11 of the D&AS says there is level access to the apartments via the original front entrance - an improvement from the previously approved scheme. But there is no mention of access to the restaurant other than to say it is via the former bank entrance, which was originally stepped. If the floor level is reduced and the step is to be removed, should this be subject to a LBC application.
4. The proposals are based on the approved scheme 22/0236/FUL and LBC. Analysis of the planning statement gives us concerns regard cycle storage. We would suggest that as this is a car free development there should be a cycle space per bedroom or at least 2 spaces per home - so a minimum of 50 spaces. The applicant cannot rely on ECC's sustainable transport SPD **which assumes that residents will also own a car** when determining cycle spaces. On page 11 of the D&A Statement it is suggested that parking is available in the Guildhall car park but this closes between 11PM and 8AM so we wonder how this will be beneficial to residents.
5. The waste Management Plan doc is very basic providing calculations and justification for the level of domestic waste bins based on 1100lt commercial bins but there is no mention of where the bins will be positioned for collection. The Planning statement says this will be in Cathedral Yard but this should be incorporated into the Waste Management Plan to ensure that these large waste bins do not blight this historical area. There is no mention of waste management for the commercial units so this must be added, including where bins will be positioned for collection, and how often.

Construction process.

This restricted site will be difficult to access and could be very disruptive if lorries and tradesmen are to access the site during the day via the most visited part of the city. Normal stipulated construction periods are between 8 and 6 but we suggest that some conditions should be made by ECC/DCC to encourage deliveries out of peak tourist hours in the evenings or in the early hours of the day to avoid the inevitable chaos of large vehicles needing to reverse in or out of Cathedral Yard. Should the applicant be expected to provide delivery vehicle turning circles to demonstrate that it is possible for large vehicles to access Cathedral Yard from South Street and leave in a forward direction?

We suggest that these matters need to be satisfactorily resolved before any conditional approval is granted.

Yours sincerely

K Lewis

Keith Lewis

On behalf of the Planning Group of Exeter Civic Society.