



Heritage Impact Assessment

25 Eldon Square,
Reading

October 2021 | Project Ref 6904A

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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Contents

1. Introduction	1
2. Relevant Planning Policy Framework.....	5
3. History and Development	8
4. Statement of Significance.....	14
5. Heritage Impact Assessment.....	22
6. Summary and Conclusions.....	30

Appendices

App. 1 Scale of Harm table (HCUK, 2019)

1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Tom Lapage-Norris and Sophie Davis, owners 25 Eldon Square, a grade II listed building in Reading. It relates to an application for planning permission and listed building consent for the conversion of the building back into a single family dwelling alongside alterations and extensions. Reading Borough Council (RBC hereafter) are the determining authority.



Figure 1: Grade II listed 25 Eldon Square

1.2 25 Eldon Square (and its semi-detached pair, no.27) was constructed in the 1840s as part of a coherent development along Eldon Square in Reading. The pair were grade II listed in 1978 (UID: 1321945) and separated into two separate flats like

during the second half of the 20th century¹. The application site is also located within the Eldon Square Conservation Area.

1.3

In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (NPPF, 2021) this statement describes the significance of the identified designated heritage assets.

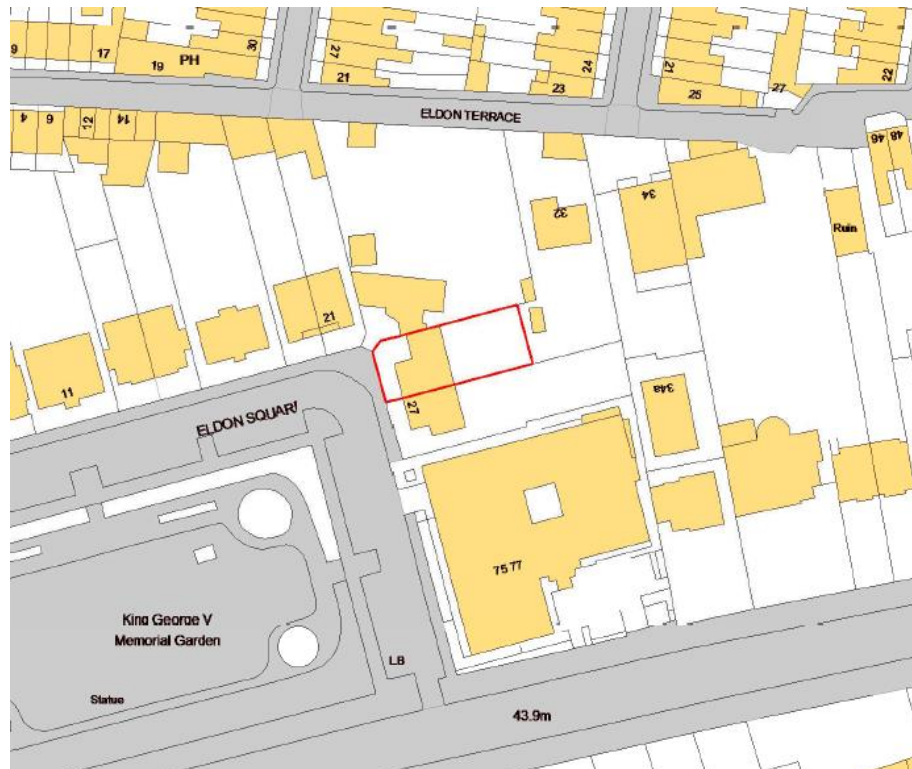


Figure 2: Site location plan

The Proposals and Relevant Background

1.4

In 2021 pre-application advice was received from RBC regarding proposals at 25 Eldon Square for the conversion of the existing buildings back into a single family dwelling (LPA ref: 210456/PRE).

1.5

As part of the written pre-application response (dated April 2021) no in principle heritage objection to the conversion of the building back into its original use as a

¹ The exact date of the subdivision of the building is not known but, as noted within the pre-application advice, this is understood to be a consented position which likely took place prior to the designation of the listed building.

single family dwelling was raised by RBC officers. Regarding the listed building specifically, the advice noted:

"Internal alterations will likely be required to amalgamate the units. From your statement, you are aware that Listed Building Consent would be required for such works. The surrounding area is residential and comprises of single dwellings. As such, the proposed single dwelling use would likely be considered acceptable in relation to the surrounding conservation area and other Listed Buildings. As noted earlier though, some justification will be required to demonstrate how the proposal would be considered a more appropriate use of the building in terms of Policy H7."

1.6

Following the receipt of pre-application advice further detail relating to the conversion of the building and physical alterations proposed have been considered with input from HCUK Group regarding the potential effects on the significance of heritage assets. In brief, the proposals for which planning permission and listed building consent is sought can be summarised as:

- Conversion of the two flats back to a single family dwelling;
- Provision of a lower ground floor extension in the form of glazed box/conservatory;
- Replacement of existing lower ground front elevation casement windows with new hard wood single glazed sashes;
- Replacement of the modern metal and glass front door;
- Introduction of storage within the entrance hall;
- Reconfiguration of the main staircase at ground floor to reinstate the original alignment;
- Creation of a ground floor WC and introduction of a relocated lower ground floor sash window (displaced by the proposed extension) to serve this space;
- Minor changes to the plan form of the first floor to create a dressing area and storage within the master bedroom and bathroom within the rear room; and
- Minor changes to the modern layout within the attic (second) floor.

Purpose of this Statement

- 1.7** The purpose of this Heritage Impact Assessment is to inform the decision makers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the heritage assets affected are presented and the effects of the proposals upon that significance are appraised. The heritage assets affected have been observed and assessed by the author following a site visit in good weather in June 2021. Specifically, this report assesses the significance of the listed building and conservation area and the effect of the proposals on that significance. The report sets out how the proposal complies with the guidance and policy of the NPPF and local planning policy.

2. Relevant Planning Policy Framework

- 2.1** The decision maker is required by sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.²
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.⁴
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either "substantial harm" or "less than substantial harm" as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at Appendix 1.

² Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

2.6 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.7 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.

2.8 The main element of local planning policy is the Local Plan (adopted November 2019) which contains the main planning policies for Reading up to 2036. The following policies are relevant to the proposals:

2.9 **EN1 Protection and Enhancement of the Historic Environment:** This policy notes that historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. It goes on to note that proposals will be expected to protect and where possible enhance the significance of heritage assets and their settings, the historic character and local distinctiveness of the area in which they are located. Proposals should seek to avoid harm in the first instance and any harm to or loss of a heritage asset should require clear and convincing justification, usually in the form of public benefits. The policy also notes that applications which affect Listed Buildings will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their setting.

⁶ The balancing exercise was the subject of discussion in *City and Country Bramshill v CCSLG and others* [2021] EWCA, Civ 320.

2.10 EN3 Enhancement of Conservation Areas: This policy notes that the special interest, character and architecture of conservation areas will be conserved and enhanced and that development proposals within conservation areas “*must make a positive contribution to local character and distinctiveness*”.

2.11 EN6 New Development in a Historic Context: This policy notes that in areas characterised by heritage assets, the historic environment will inform and shape new development. New development will make a contribution to the historic character of the area by respecting and enhancing its architectural and visual qualities and considering how heritage considerations can influence the design of new development. When determining planning applications for new development, the following factors will be taken into consideration:

- The positive contribution of the development to the existing historic townscape (scale, height, mass, proportion, plot size, street form, materials, significant vistas and views, and open space);
- Sensitivity to historic context;
- Reflection of borough-wide major heritage themes that contribute to local distinctiveness (e.g. patterned brickwork or former worker terraced housing); and
- Whether development promotes and/or improves access to previously undiscovered or neglected historic significance.

3. History and Development

3.1 By the 18th century Reading had become a popular town on the coaching route between bath and London. While development until this point had focused around the medieval confines of the town, the town's expansion was soon notable thanks in part to:

- The development of the canals which, by 1810, had created a waterway connection between London and Bristol; and
- The arrival of the railway in 1840 which introduced rapid growth and industry

3.2 The development of Eldon Square was among the many new dwellings established to the east of the town during this period and followed sale of the land from the Crown Estates. While originally a much grander set piece was envisioned, this was not realised and more modest terraces were constructed on St John's Street, St John's Hill, St John's Road and Prince's Street.

3.3 The buildings on Eldon Square were constructed from Bath stone brought to Reading by the Kennet and Avon Canal with the square itself named after Lord Eldon (b.1751, d.1838) who spent much of his life in Sonning, Berkshire and was a patron of the Royal Berkshire Hospital. The housing is thought to have been constructed as housing for the employees of Huntley & Palmers but became popular with doctors at the Royal Berkshire Hospital, the first stage of which was completed in 1839.

3.4 It is the 1879 Ordnance Survey (OS hereafter) Map (**Figure 3**) which first clearly shows the built form of Eldon Square. 25 Eldon Square, and its matching pair, no.27, can be seen as an entirely symmetrical pair on the eastern side of the square with narrow landscaped gardens to their rear.

3.5 A picture of Eldon Square (taken from the front of no.25 looking west) shows the character of the square shortly after the building's construction in 1875 (**Figure 4**).

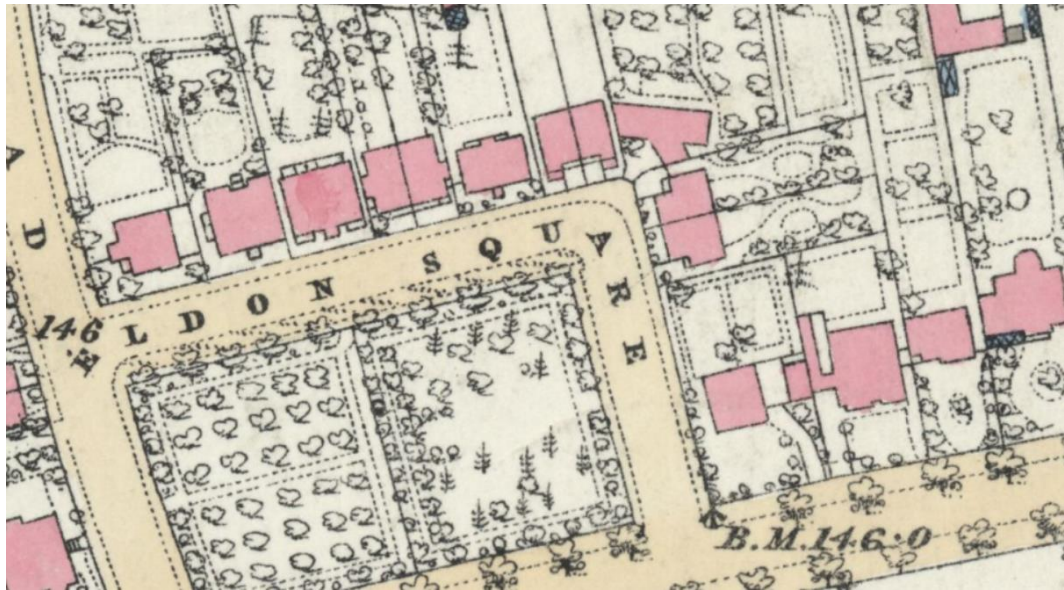


Figure 3: 1879 OS Map (surveyed 1875). Reproduced with permission of the National Library of Scotland

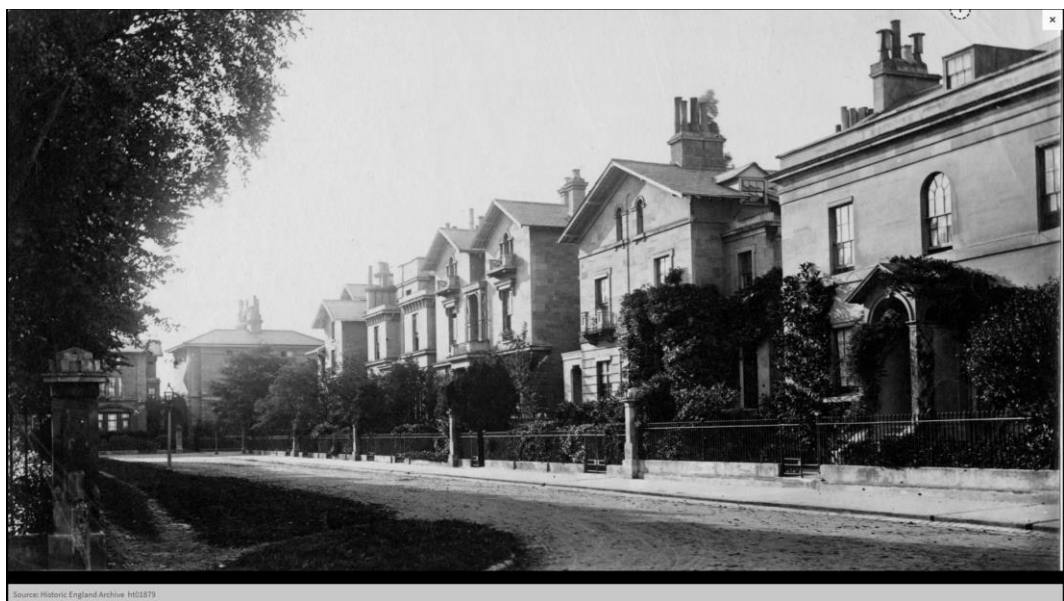


Figure 4: 1875 Picture of Eldon Square © Historic England Archives

3.6

By the time of the 1900 OS Map (**Figure 5**), an extension to the northern side of the entrance bay of 25 Eldon Square can be seen. An assessment of both nos. 25 and 27 demonstrate that when constructed they each had a flanking lower entrance bay. While this remains present to no.27, it is clear that the late 19th century extension (added between c.1875 and 1898) to no.25 included both a first floor

addition above the lower entrance bay and a further extension to the north (**Figures 6 and 7**). At ground floor level this addition was a narrow alley through to the rear garden (as present today).

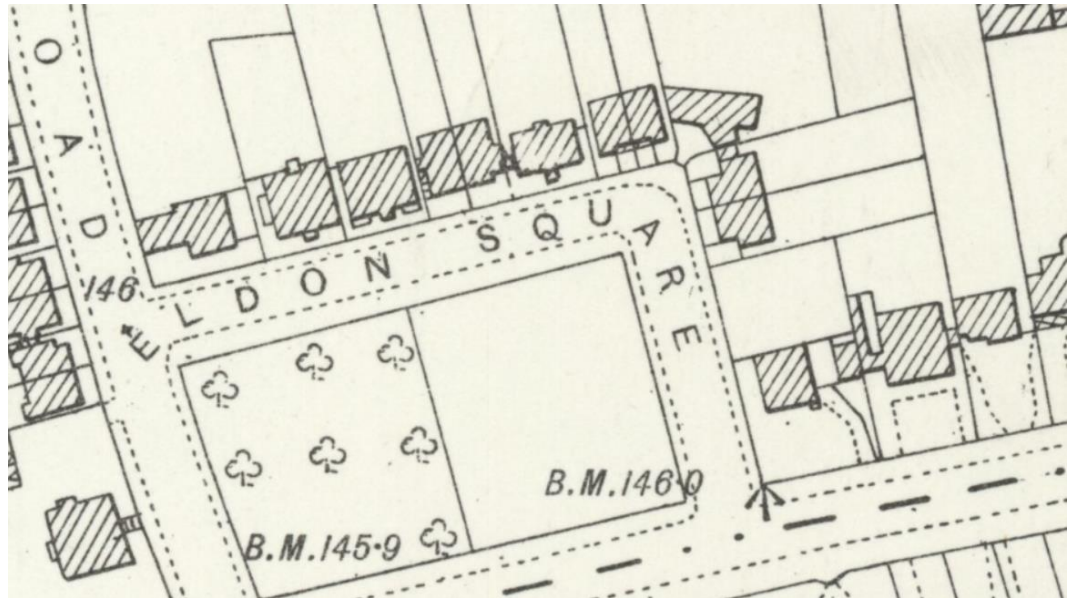


Figure 5: 1900 OS Map (revised 1898). Reproduced with permission of the National Library of Scotland



Figures 6 and 7: Extended entrance bay to no.25 (left) and entrance bay as originally configured present at no.27 (right)

3.7

Various photographs of 25 Eldon Square from the 1930s-1950s (**Figures 8-10**) exist and show the arrangement of Eldon Square and the application site during this period.



Figure 8: c.1930 Photograph of 25 and 27 Eldon Square © <https://talbot.bodleian.ox.ac.uk/search/catalog/artifact-13101>



Figure 9: 1932 Aerial photograph of Eldon Square © Britain From Above, ref: EPW037492



Figure 10: c.1940s/50s Photograph of 25 Eldon Square © The Tate

3.8

The footprint of no.25 does not change again, but further significant alterations were undertaken to the building throughout the 20th century which include:

- The conversion of the attic into a habitable space. In order to achieve this It appears as though the centre of the historic hipped roof was replaced with a crown roof form and dormer windows were introduced;
- The conversion of the building into two separate residential units and associated physical changes internally to all floors;
- The replacement of the original front entrance door;
- The replacement of the original lower ground floor front sash windows with metal windows; and
- The reduction in scale of the rear garden (handed over to 32 Eldon Square).

3.9

25 and 27 Eldon Square were grade II listed as a pair in 1978. The list description, one of the older types for identification purposes only, reads:

"ELDON SQUARE 1. 5128 Nos 25 and 27 SU 7273 7/475 II GV 2. Circa 1840s. Pair. 2 storeys, attic and basement. Bath stone ashlar, ground floor channelled with band over. Flat eaves with plain brackets. Hipped slate roof with central ashlar chimney. 4 bay centre with 2 large later 4-light dormers and 4 arched glazing bar sash windows with moulded architraves to heads and flanking arched panels. On the ground floor: tall French casements with 2 tented verandah balconies with pierced stone parapets on stone brackets. Flanking set-back doorways which have shaped low relief pediments, No 25 as a glazed door and a 2 storey 2 window extension."

4. Statement of Significance

4.1 This chapter of the report establishes the significance of the relevant heritage assets, namely the grade II listed 25 Eldon Square and the Eldon Square Conservation Area, in the terms set out in the NPPF. This chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment).

25 Eldon Square

4.2 25 Eldon Square is a building of architectural interest, primarily as a result of the quality and form of its exterior with its modest late Georgian/early Victorian detailing. This interest is elevated when considered in the context of its group value with its matching neighbouring building, no.27, the other buildings of comparable date and form within the square and the central formal gardens.

4.3 Of particular quality is the front elevation which is constructed of Bath stone with rusticated ground floor, decorative doorcase surrounding the main entrance door, leaded porch and decorative window heads. Historic windows survive at ground and first floor though the dormers to the attic are clearly modern and the lower ground floor front windows have been replaced during the mid 20th century with metal casements.



Figures 11 and 12: Front and rear elevations of 25 Eldon Square

4.4

While a historic alteration, the extension of the entrance bay (both to the side and upwards) has had some effect on the character of the building, unbalancing the former symmetrical pairing with no.27. The modern entrance door is constructed from fretted metal and glass and detracts from the character, appearance and significance of the grade II listed building.



Figures 13 and 14: Extended entrance bay with modern front door (left) and side access to rear gardens at ground level within the extended the entrance bay (right)



Figures 15 and 16: Rear elevation at lower and upper ground floor (left) and internal view within the lower ground floor rear room (right)

4.5

The rear elevation is of less formality, as can be expected in a building of this form and date, but retains a high quality character and appearance which evidences the building's quality. While of more limited formality and architectural character than the frontage, the rear elevation remains to be of some value architecturally due to

its modest form and appearance denoting the more subservient nature of the building's rear. The rear elevation has not been extended (bar the side extension to the entrance bay) but changes including the introduction of later windows and the blocking of an earlier opening is evident.

4.6 Internally, while altered, the building does contribute to the significance of the grade II listed building.

4.7 The plan form of the building has been altered as a result of successive changes to the residential accommodation and the subdivision of the original single family dwelling to provide two flats in the 20th century. The most notable changes are discussed below:

- The plan form of the lower ground floor remains broadly as constructed;
- The ground floor plan form has been altered as a result of the later 19th century extension to the entrance bay and as a result of the residential subdivision of the building which entailed the realignment of the staircase and introduction of various lobbies and partitions. Otherwise the plan form on this floor remains broadly as constructed with a large formal room to the front and smaller rear room, now connected by double doors;
- The first floor plan form has been altered through the later 19th century entrance bay addition (which has provided a single room served off the original landing) and through the subdivision of the original rear room to provide a corridor and cupboard. This has resulted in access to the large front room being relocated and the original proportions of the rear room having been impinged upon; and
- While access to the second floor (attic) of the building appears to be historic, the partitions and layout present are entirely modern and resulting from substantial changes to the roof structure.

4.8 While the plan form of the building has been altered over time, the original early to mid 19th century plan form remains legible and makes a strong positive contribution to the asset's architectural values.

4.9 Other internal elements which contribute to the significance of the building include, where surviving, elements of 19th century detailing, namely, the main staircase

(lower ground to ground and first to second floor), ground floor cornices, joinery and fire places.



Figures 17 and 18: Main room at ground floor which retains original cornicing, joinery and fire surround



Figures 19 and 20: Altered ground floor staircase (left) and original first floor flight (right)

4.10 The historic interest of 25 Eldon Square (alongside the remaining listed buildings in the formal composition) stems from its group value as part of a coherent group of properties developed within the c.1840s that legibly demonstrate the development of this part of Reading in the early to mid 19th century. The buildings, both individually and as a group, help to illustrate domestic practices, fashions and construction practices of the period and those of later changes, most prominently with regards to 25 Eldon Square, the later 19th century. There are no known historic

associations, such as famous residents or a known architect, which would elevate the historic interest of the building.



Figures 21 and 22: Front main room at first floor (left) and rear room (right) which has been altered through the addition of a corridor and cupboard, righthand side of the photograph, most notably shown by the off centre chimney breast



Figures 23 and 24: Modern habitable space located within the second floor (attic)

- 4.11** The significance of the building is not derived from any specific archaeological or artistic interest.

Eldon Square Conservation Area

- 4.12** The Eldon Square Conservation Area was first designated in 1972 with an extension to its boundary in 1982 taking in Watlington Street, Eldon Street, Victoria Street and Montague Street. RBC have adopted a Conservation Area Appraisal for this

designated heritage asset which has, alongside a site visit, informed this assessment.



Figures 25 and 26: Views within Eldon Square, a key focus within the Eldon Square Conservation Area



Figures 27 and 28: Built form within the Eldon Square Conservation Area

4.13 The conservation area focuses on an urban location to the east side of the medieval core of Reading. The most distinctive element of the conservation area, and its namesake, is Eldon Square, a mid 19th century development of houses surrounding a small rectangular park and a statue of the first Marquess of Reading.

4.14 The Conservation Area Appraisal provides a thorough assessment of the history and development of Reading and this area (not replicated here for brevity) and summarises the special interest of the conservation area deriving from:

"- Eldon Square, a mid 19th century planned formal town square comprising an enclosed park surrounded on three sides by Bath stone detached and semi-detached buildings;

- Eldon Road, part of the formal arrangement of Eldon Square notable for a row of mid 19th century dwellings on its west side;

- The park at Eldon Square, known as King George V Gardens, which is enclosed by grade II listed railings and contains mature trees and other greenery and a large statue of the first Marquess of Reading, died 1935;

- Nos 163 to 189 (odd) Kings Road, a long row of prestigious Bath stone former early 19th century residences with good quality Classical and Italianate detailing;

- The architectural and historic interest of the area's buildings, including two grade II listed buildings (Watlington House and 173-183 (odd) Kings Road);*

- Two churches in unusually close proximity (Wesley Methodist Church and Church of St John the Evangelist) the spires of which are a local landmark;

- 19th century street pattern on either side of Eldon Road with traces of an earlier unrealised formal layout in the vicinity of The Oval;

- Cohesive architectural development of the mid 19th century with contrasting middle-class and working class housing;

- Lengths of historic stone kerbs and gulleys and remnants of old railings;

- Good examples of small mid 19th century terraced houses probably occupied by workers in nearby Huntley and Palmers, the largest employer in 19th century Reading;

- Trees and groups of trees in the park in Eldon Square and in the curtilage of Watlington House and The Oval;

- The prevalent use of Bath stone and local brick;

- Distinctive local details such as cast iron street name signs and old lamp posts."

4.15 The Conservation Area Appraisal divides the conservation area into three distinct areas as a reflection of the varying character. These include:

- Area 1: Kings Road, Eldon Road and Eldon Square
- Area 2: Terraced streets west of Eldon Road
- Area 3: Terraced Streets east of Eldon Road

4.16 The application site falls within Area 1. Positive elements of this part of the conservation area noted within the Appraisal include:

- The high concentration of listed buildings;
- The architectural cohesion of prestigious mid 19th century residential development;
- The formal planning of Eldon Square;
- King George V Gardens and railings in Eldon Square;
- Grandeur of nos 163 -189 Kings Road;
- Good quality townscape;
- Prevalent use of local stone;
- Areas of historic stone paving and kerbs/gutters in Eldon Square;
- The green open space of King George V Gardens bordered by mature trees.

4.17 25 Eldon Square (and its matching pair no. 27) make a strong positive contribution to the character, appearance and significance of the designated heritage asset as a c.1840s dwelling which directly reflects the area's high quality townscape and forms part of an architectural set piece of formal planning.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter.

Impact Assessment

5.2 As discussed in the Introduction, the main component of the application is the reinstatement of the building (currently serving as two flats) back into its original use as a single family dwelling. In principle, this is a positive change reinstating the original function and domestic arrangements of the building, resulting in an enhancement to the asset's significance. There are a number of physical alterations proposed to the building to facilitate this reinstatement and these are discussed below in detail under relevant subheadings for ease of understanding. However, in brief, these works would restore the original circulation and hierarchy of the building which would represent a further heritage benefit, enhancing the building's significance.

Lower Ground Floor

5.3 The main change proposed at lower ground floor level includes the introduction of a modestly scaled rear extension in the form of a glazed box/conservatory. The design and form of the extension has been carefully considered to ensure that it is an appropriate addition to the grade II listed building which preserves its significance. This is ensured by:

- The location of the extension which is a logical one extending from the building's ancillary lower ground floor level. The partially sunken nature of this floor in comparison to the ground level, in conjunction with the extension's modest scale, ensures that it reads as an subservient addition to the building's rear elevation;

- The predominant use of glazing for the proposed extension ensures that the extension reads as an honestly modern and lightweight addition to the rear of the listed building; and
- The height of the extension stops short under the existing upper ground floor French doors and iron-work Juliette balcony retaining this attractive feature of the rear elevation.

5.4

While the extension itself would preserve the significance of both the listed building and conservation area, in order to access the extension an original timber sash window (**Figure 29**) would need to be removed (the two smaller flanking windows present would be retained but internalised). It is acknowledged that the removal of this window would result in some harm to the significance of the grade II listed building. However, in order to minimise and mitigate the harm resulting from this, the window is proposed to be relocated elsewhere in the building. The relocation of the window is discussed in more detail below under the 'Upper Ground Floor' proposals and the overall heritage balance of the proposals is provided within the 'Policy Compliance' section.



Figures 29 and 30: Existing sash window (left) to be relocated to provide access into the proposed extension. Existing leaded light window to the front elevation (right) proposed to be replaced

5.5

As noted in the preceding section, the front facing lower ground floor windows (**Figure 30**) are 20th century leaded lights, likely dating from the 1930s-50s. These windows clearly contrast with the formal Georgian character of the building and detract from the composition of the front elevation. Proposals seek to replace these windows with appropriate single glazed timber sash windows (matching those which have been recently introduced to the lower ground floor of no.27). These works

would result in a clear aesthetic enhancement to the listed building and a modest enhancement to the authenticity of the conservation area.

Upper Ground Floor

5.6 The only external change to the front elevation at upper ground floor is the introduction of a replacement front door. The existing front door (**Figures 31 and 32**) is non-original and, due to its contrasting materials and form (profiled metal and glass), does not contribute to the significance of either the listed building or conservation area. Replacing the door with a more appropriately detailed door (directly influenced by other original doors in the Square and the 1940s/50s photograph of the building, **Figure 10**) would amount to a clear heritage benefit to the listed building and a modest enhancement to the authenticity of the conservation area.



Figures 31 and 32: Existing contrasting front door viewed externally (left) and internally (right)

5.7 The most notable change to the upper ground floor entails reconfiguration of the altered staircase and lobby with a view to reinstate the arrangement and plan form present at the time of the late 19th century (when the entrance bay was extended).

5.8 Existing partitions proposed to be removed all date to the c.mid 20th century and, creating lobbies etc., clearly relate to the use of the building as two flats. These

partitions are no of any heritage value and their removal would reinstate the late 19th century plan form with an enlarged entrance hall leading directly to a smaller stair lobby to the right hand side and a separate room directly ahead. All existing doors of historic nature would be retained in-situ.

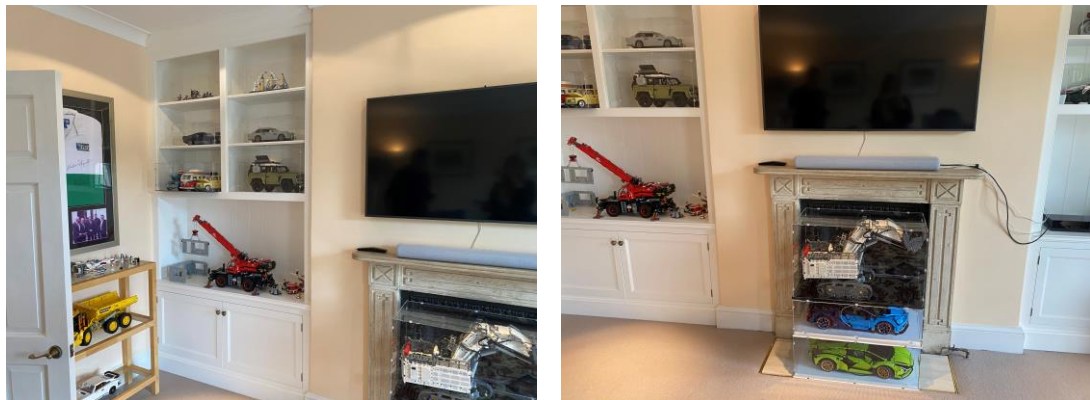
- 5.9** As noted in the preceding section, the original half landing staircase has been altered on the ground to first floor flight in order to subdivide the building into two flats and provide separate access to the lower ground and ground floor flat and the upper floors flat from the shared entrance lobby. The original staircase survives below and on the upper floors and (alongside the original staircase at no.27) provides clear evidence as to the form and detailing originally present.
- 5.10** Reinstating the staircase as per its original configuration would represent a clear heritage benefit, enhancing the authenticity and integrity of the grade II listed building and resulting in a marked enhancement to its architectural values. The relocated flight appears to have re-used a degree of historic fabric of the original staircase and as part of these works the intention would be to retain all original/historic fabric possible and incorporate this into the restored flight.
- 5.11** The smaller room directly ahead of the main entrance door is proposed to be converted to a ground floor WC following the relocation of the staircase and this room, which has only a later c. 20th century small circular window) would be the location for the re-sited lower ground floor sash window. The location of the window has been carefully considered to retain the character of the rear elevation's fenestration pattern while also ensuring that serves the room at an appropriate level (see section E-E and the proposed rear elevation). The window has also been located in an area of clear later in-fill stone work, thus limiting the loss of any original Bath stone.
- 5.12** The final minor change within the ground floor of the building includes the introduction of high level storage within the entrance hall, above the side access route. These proposals would result in the loss of a wholly limited area of later 19th century fabric, however, this would not lead to any harm to the significance of the listed building. The limited area of fabric proposed to be removed would not affect any elements of special interest and the proportions and character of both the entrance hall (enlarged in the later 19th century) and side access route (introduced in the later 19th century) would be retained.

First Floor

5.13 In accordance with the assessment in the preceding section, the plan form of the first floor has already been altered through the introduction of a new corridor and cupboard (against the spine wall) and various changes to historic openings. When constructed the plan form on this level would have been two single rooms (one large to the front and one small to the rear) both accessed off the stair hall via single doors.

5.14 Proposals on this floor seek minor changes only. The rear room is proposed to be converted into a bathroom and the modern cupboard (formerly part of the small rear room) would be brought back into this space to be used as a shower area. These changes would have no bearing on the significance of the listed building affecting an already altered part of the building's plan form.

5.15 Changes to the front room are equally limited and involve the introduction of replacement in built joinery within the niches either side of the chimney breast (replacing the existing modern cupboards present) and the introduction of a part height partition wall creating a dressing area behind.



Figures X and X: Existing modern cupboards and cornicing to be replaced (left) and existing fire surround to be retained (right)

5.16 While introducing a new partition within the front large room, which retains its original proportions, the new partition would be considerably set off from the ceiling level, so that it is appreciated as a clearly modern addition. This arrangement is clearly shown on Sections A-A and B-B where the limited scale of the partition in context of the room as a whole can be appreciated. New fitted cupboards would be

introduced behind the partition and new, more appropriate, cornicing introduced within the room. Existing skirting boards and other detailing, including the fire surround, would be retained.

Second Floor

- 5.17** As noted in the preceding section, while access to the attic appears to have always been possible, the configuration of partitions and habitable accommodate present within the attic now is an entirely modern construct. The minor changes to the plan form and layout within this secondary and predominantly modern space, would have no bearing on the significance of the grade II listed building. The floor's overall compartmentalised character would be retained while providing a more comfortable residential arrangement.

Policy Compliance

- 5.18** The proposed scheme of works is based on an understanding of the character of the listed building and conservation area, their historic development and significance. The works have been informed by this alongside on-site assessment of surviving historic fabric and the way in which the building has been changed over time. The proposals have been designed to support the existing residential use of the building while reinstating its original function as a single family dwelling and enhancing its unique heritage values.
- 5.19** With regards to the impact on the listed buildings, as identified above, it is acknowledged that the removal (and relocation) of the lower ground floor sash window will result in a minor effect on the significance of 25 Eldon Square. This effect has been minimised and mitigated through the retention and relocation of the original window within a carefully chosen location on the upper ground floor.
- 5.20** Any harm caused by this element of the proposal would be wholly limited and, in NPPF terms, demonstrably a low level of 'less than substantial' which would not seriously affect the asset's significance (**Appendix 1**). However, the scheme also facilitates a number of benefits to the significance of the grade II listed which

amount to public based heritage benefits. In accordance with paragraph 202 of the NPPF public benefits can include securing the optimum viable use of the building and, paragraph 020 of the PPG notes that works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit alongside works which remove risk and enhance significance.

5.21 Application of paragraph 202 of the NPPF requires these benefits to be considered alongside the identified harm. These works, which enhance the special architectural and historic interest of the listed building, include:

- Reinstatement of the building back to its original use as a single family dwelling and, as a result of this, the reconnection of vertical circulation throughout the building;
- Replacement of the modern front door with a period appropriate feature;
- Reinstatement of period appropriate sash windows to the front elevation at lower ground floor;
- Reinstatement of the ground floor flight of the main staircase in its original location;
- Reinstatement of the late 19th century plan form within the entrance hall; and
- Provision of new period appropriate cornices to the front first floor room (master bedroom) in replacement of the existing modern run coving.

5.22 These benefits are considerable in both scale and nature and would demonstrably outweigh the very limited harm identified, thus resulting in a scheme where harm to the significance of the listed building is neutralised. Indeed, there would be a net benefit (i.e. an overall enhancement) to the significance of the grade II listed building.

5.23 Conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance. In this case the most significant aspects of the building, its external form and appearance, contribution to the wider area and the vast majority of its historic fabric and plan form, will be retained if not enhanced.

- 5.24** Turning to the scheme's impact on the significance of the Eldon Square Conservation Area, by virtue of the high quality, modest scale and inobtrusive location, the proposals are considered to preserve the significance of this designated asset.
- 5.25** Overall, the assessment of the merits of the scheme presented within this statement has concluded that the proposals will preserve and enhance the significance of the grade II listed building (i.e. nos.25 and 27 Eldon Square) and the Eldon Square Conservation Area. As such, it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 of the NPPF insofar as they will not result in any harm to, or loss of significance of the grade II listed buildings or the conservation area, indeed, the proposals amount to a clear enhancement to the significance of the listed building. As such, there would be preservation for the purpose of the decision maker's duty under sections 16, 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990. The proposals are also found to comply with local policies included within Section 2 of this report, namely EN1, EN3 and EN6.

6. Summary and Conclusions

- 6.1** This Heritage Statement has been prepared in accordance with paragraph 194 of the NPPF and supports an application for planning permission and listed building consent relating to alterations to the grade II listed 25 Eldon Square.
- 6.2** This report provides a proportionate assessment of the significance of the listed building and the Eldon Square Conservation Area and this is followed by an assessment of the effect of the proposals on that significance.
- 6.3** The proposals relate to the reinstatement of the grade II listed building back into a single family dwelling (it is currently split into two flats) alongside a lower ground floor extension and minor internal and external alterations. Section 5 of this report concludes that these works result in both negative and positive proposals and that, when considered holistically, the development results in a clear enhancement to the significance of the grade II listed building, reinstating the original use of the building, lost details and plan form and replacing poor quality modern details with period appropriate features. As such, overall, the proposals would entirely preserve the significance and special interest of both the grade II listed building and conservation area.
- 6.4** In summary, the proposed works to the grade II listed building are considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. When considered holistically, the proposed development falls outside the remit of paragraphs 201-202 of the NPPF insofar as there would be no harm caused to the asset's significance. There would be preservation for the purpose of the decision maker's duty under sections 16, 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990. The proposals are also found to be compliant with relevant local planning policies.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2021

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)