

Heritage Impact Statement:  
26/28 Southampton Street  
Reading  
Berkshire  
RG1 2QL  
National Grid Reference: SU71577297  
SU 471574 172973

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18<sup>th</sup> October 2018

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## Table of Contents

|                                                                                                                                      |    |
|--------------------------------------------------------------------------------------------------------------------------------------|----|
| 1. Summary .....                                                                                                                     | 1  |
| 2. Introduction .....                                                                                                                | 2  |
| 2.1 The Client .....                                                                                                                 | 2  |
| 2.2 Confidentiality and Copyright .....                                                                                              | 2  |
| 2.3 Location .....                                                                                                                   | 2  |
| 2.4 Site Visit .....                                                                                                                 | 2  |
| 3. Historic Environment Planning History & Background .....                                                                          | 5  |
| 3.1 Conservation Area .....                                                                                                          | 5  |
| 4. Historic Background .....                                                                                                         | 5  |
| 4.1 The History of The Settlement .....                                                                                              | 5  |
| 5. The Building .....                                                                                                                | 6  |
| 5.1 Introduction .....                                                                                                               | 11 |
| 5.2 Listed Building Description .....                                                                                                | 11 |
| 5.3 The Building .....                                                                                                               | 11 |
| 5.4 Trade Directories .....                                                                                                          | 12 |
| 5.5 The Date of the Building .....                                                                                                   | 12 |
| 5.6 The Construction Sequence .....                                                                                                  | 12 |
| 6. The Plan Form of The Building .....                                                                                               | 14 |
| 7. The Condition of The Building .....                                                                                               | 14 |
| 8. The Importance of The Building .....                                                                                              | 15 |
| 8.1 The Importance of The Building Listing Criteria .....                                                                            | 15 |
| 8.2 The Date of the Building .....                                                                                                   | 16 |
| 8.3 Rarity .....                                                                                                                     | 16 |
| 8.4 Architectural and Historic Interest .....                                                                                        | 16 |
| 8.5 Group Value .....                                                                                                                | 17 |
| 8.6 Other Factors .....                                                                                                              | 17 |
| 8.7 The Importance of Particular Types of Building .....                                                                             | 18 |
| 8.8 The Significance of The Building Understanding Heritage – Values Conservation Principles Policies and Guidance 2008 Method ..... | 18 |
| 9. The Contribution to Significance made by the Setting of the Building .....                                                        | 19 |
| 9.1 The Definition of Setting .....                                                                                                  | 19 |
| 9.2 The Setting of The Building & The Surrounding Area .....                                                                         | 19 |
| 10. Proposals and Conclusions .....                                                                                                  | 20 |
| 11. Appendix: Map Regression Exercise .....                                                                                          | 22 |
| 11.1 1879 Ordnance Survey Map .....                                                                                                  | 22 |

|       |                                                                                                                          |    |
|-------|--------------------------------------------------------------------------------------------------------------------------|----|
| 11.2  | 1899 Ordnance Survey Map.....                                                                                            | 23 |
| 11.3  | 1912 Ordnance Survey Map.....                                                                                            | 24 |
| 11.4  | 1931 Ordnance Survey Map.....                                                                                            | 25 |
| 11.5  | 1957-8 Ordnance Survey Map .....                                                                                         | 26 |
| 11.6  | 1962-9 Ordnance Survey Map .....                                                                                         | 27 |
| 11.7  | 1971 Ordnance Survey Map.....                                                                                            | 28 |
| 11.8  | 1982 Ordnance Survey Map.....                                                                                            | 29 |
| 11.9  | Modern Ordnance Survey Map .....                                                                                         | 30 |
| 12.   | Appendix: Definitions: .....                                                                                             | 31 |
| 13.   | Legislative and Policy Background .....                                                                                  | 32 |
| 13.1  | Word Definitions .....                                                                                                   | 32 |
| 13.2  | The Historic Environment System .....                                                                                    | 32 |
| 13.3  | Historic Building and Monuments Commission (England) .....                                                               | 32 |
| 13.4  | Planning (Listed Buildings and Conservation Areas) Act 1990 Listed Buildings                                             | 32 |
| 13.5  | Planning (Listed Buildings and Conservation Areas) Act 1990 Conservation<br>Areas                                        | 33 |
| 13.6  | The 2007 Heritage White Paper and English Heritage 2008 Document<br>Conservation Principles, Policies and Guidance ..... | 33 |
| 13.7  | 2010 DCMS Circular - Principles of Selection for Listing Buildings .....                                                 | 35 |
| 13.8  | 2010 Planning Policy Statement 5 - Non Designated Heritage Assets.....                                                   | 35 |
| 13.9  | Heritage Assets .....                                                                                                    | 35 |
| 13.10 | Above Ground Undesignated Heritage Assets .....                                                                          | 36 |
| 13.11 | 2018 The National Planning Policy Framework.....                                                                         | 36 |
| 13.12 | DCMS 2014 document Planning Practice Guidance .....                                                                      | 36 |
| 13.13 | 2015 Historic Environment Good Practice Advice in Planning .....                                                         | 36 |
| 13.14 | Determining Importance and Significance .....                                                                            | 36 |
| 13.15 | The Degree of Harm.....                                                                                                  | 38 |
| 13.16 | Public and Heritage Benefits and Harm justified by Other Non Public Benefits.                                            | 41 |
| 13.17 | Heritage Benefits .....                                                                                                  | 41 |
| 13.18 | Public Benefits.....                                                                                                     | 42 |

## Table of Figures

|                                                                          |    |
|--------------------------------------------------------------------------|----|
| Figure 1: General Location Plan. Scale 1:10,000 .....                    | 3  |
| Figure 2: Detailed Location Plan. Scale 1:1000 .....                     | 4  |
| Figure 3: Floor Plan .....                                               | 10 |
| Figure 4: Phased floor plan, 1:100 @ A3.....                             | 13 |
| Figure 5: Proposed Floor Plan, 1:100 @ A3 .....                          | 21 |
| Figure 6: 1879 Ordnance Survey 1:500 map, reproduced at 1:1000 .....     | 22 |
| Figure 7: 1899 Ordnance Survey 1:2500 map, reproduced at 1:1000 .....    | 23 |
| Figure 8: 1912 Ordnance Survey 1:2500 map, reproduced at 1:1000 .....    | 24 |
| Figure 9: 1931 Ordnance Survey 1:2500 map, reproduced at 1:1000 .....    | 25 |
| Figure 10: 1957-8 Ordnance Survey 1:1250 map, reproduced at 1:1000 ..... | 26 |
| Figure 11: 1962-9 Ordnance Survey 1:1250 map, reproduced at 1:1000 ..... | 27 |
| Figure 12: 1971 Ordnance Survey 1:2500 map, reproduced at 1:1000 .....   | 28 |
| Figure 13: 1982 Ordnance Survey 1:1250 map, reproduced at 1:1000 .....   | 29 |
| Figure 14: Modern Ordnance Survey 1:2500 map, reproduced at 1:1000 ..... | 30 |

## Table of Plates

|                                                     |   |
|-----------------------------------------------------|---|
| Plate 1: East aspect.....                           | 6 |
| Plate 2: West elevation .....                       | 6 |
| Plate 3: Ground floor of 28.....                    | 7 |
| Plate 4: Ground floor of 29.....                    | 7 |
| Plate 5: First floor of 28.....                     | 8 |
| Plate 6: First floor of 29.....                     | 8 |
| Plate 7: 2nd floor of 29.....                       | 9 |
| Plate 8: Staircase from first to second floor ..... | 9 |

## Version Control

| Version No | Draft         | Content Added/Omitted | Date                          |
|------------|---------------|-----------------------|-------------------------------|
| 0.5        | Client Draft  |                       | 18 <sup>th</sup> October 2018 |
| 0.7        | LPA Draft     | Client Comments       |                               |
| 1          | Issued Report |                       |                               |
|            |               |                       |                               |
|            |               |                       |                               |

Heritage Statement: 26/28 Southampton Street  
Dr Peter Wardle and Colin Lacey  
18<sup>th</sup> October 2018

## 1. Summary

This Heritage Statement should be read in conjunction with the planning application and listed building consent application.

The building is a pair of former houses currently used as offices. It is dated to the 19th-20th by the listing description and fabric. It is Grade II Listed and is not located in a conservation area.

The following phases of construction are present:

| Phase | Period                       | Date      | Description                      |
|-------|------------------------------|-----------|----------------------------------|
| 1     | Early 19th                   |           | Three-storey section of building |
| 2     | Late 19th<br>/ Early<br>20th |           | Central section of building      |
| 3     |                              | 1912-1931 | Southern part of building        |
| 4     |                              | Post 1931 | Northern extension               |
| 5     | Modern                       |           | Eastern staircase                |

The current function of the building is as commercial offices. When the building was constructed its function was a pair of houses.

The special character of 26 & 28 Southampton Street solely lies in the appearance of the eastern façade of the building which has an apparent historic appearance.

It is proposed to convert the building from commercial offices to residential use, with two flats and one house to be formed from the internal space.

The proposed plans are reproduced overleaf.

The proposals will have no effect on the setting of the building.

The building will be returned to its former use as a residential property, and owing to the extensive internal alterations that have already occurred, little impact to the historic fabric will be caused by the proposed work.

The proposals are therefore positive.

## **2. Introduction**

### **2.1 The Client**

This report was commissioned by Anthony Sharp.

### **2.2 Confidentiality and Copyright**

This document is to remain confidential for a period of 12 months or until it forms part of a formal planning application or until otherwise indicated by the client. The copyright of this report belongs to the Historic Environment Consultancy. No liability to third parties is accepted for advice and statements made in this report.

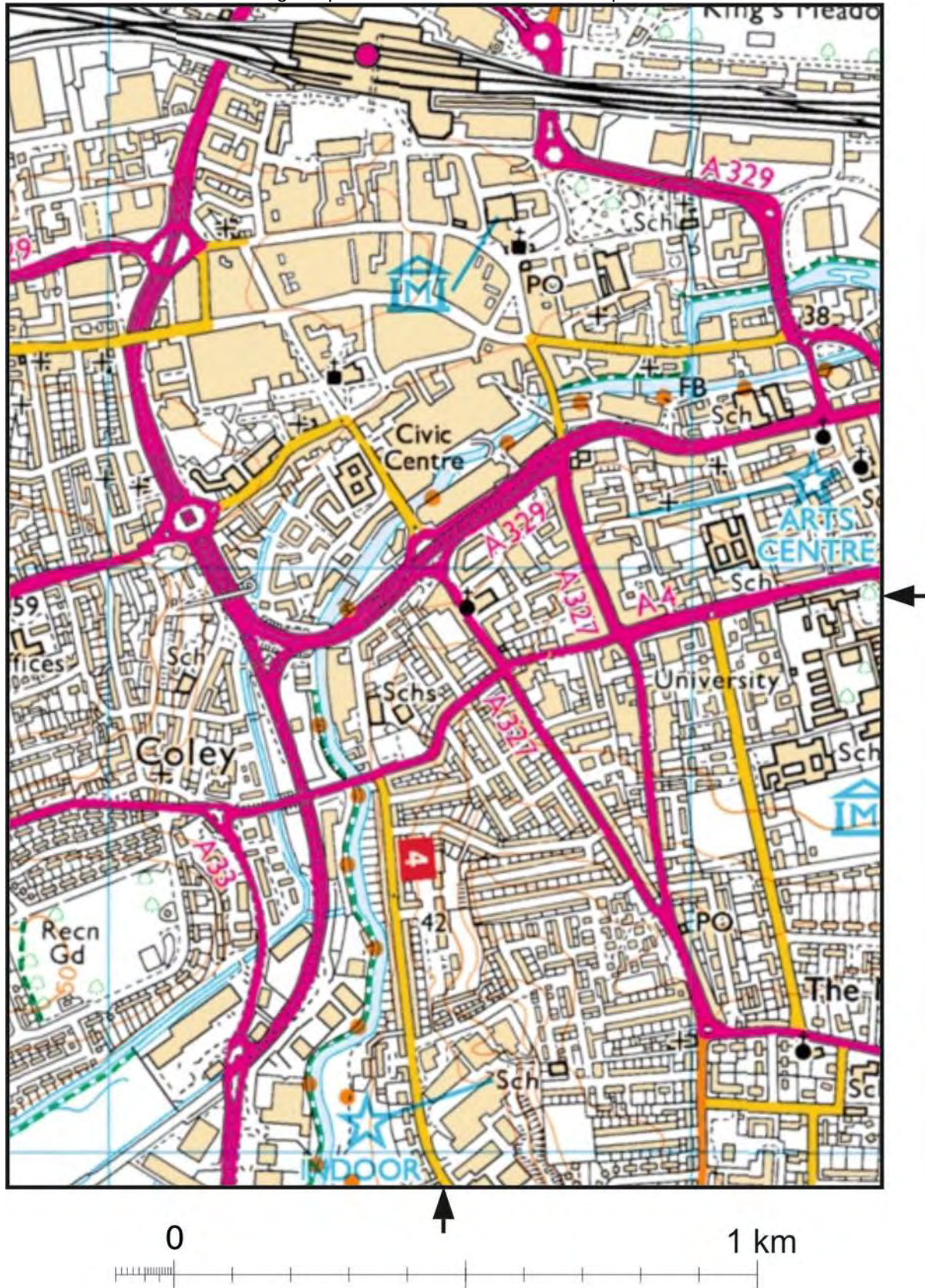
### **2.3 Location**

|                 |                                                  |
|-----------------|--------------------------------------------------|
| Site Address:   | 26/28 Southampton Street<br>Reading<br>Berkshire |
| Post Code       | RG1 2QL                                          |
| Grid Reference: | SU71577297                                       |

The general location is shown in Figure 1 and the detailed location in Figure 2.

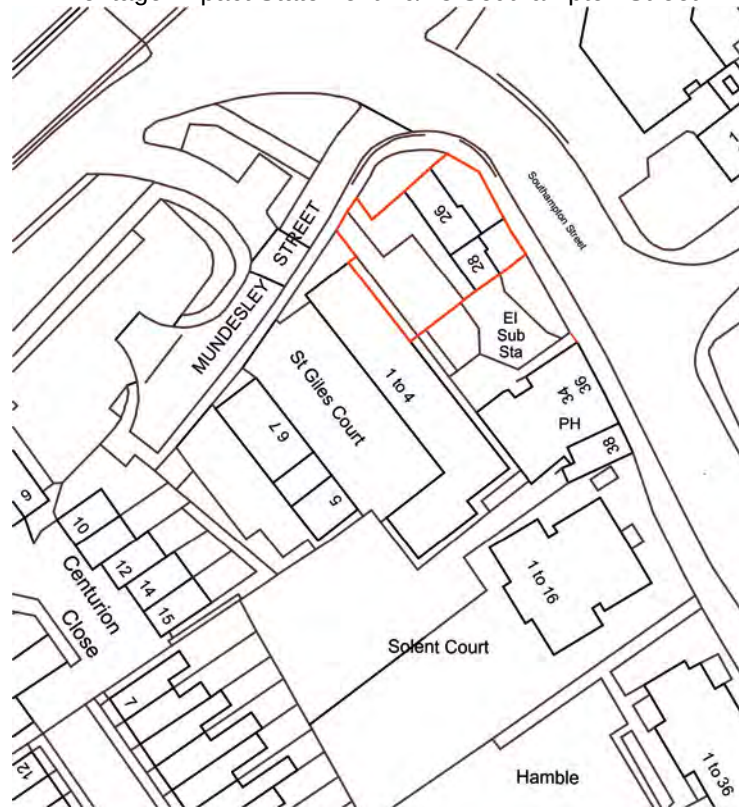
### **2.4 Site Visit**

The Site was visited by Dr Peter Wardle and Colin Lacey on 10th October 2018.



Metres 1:10,000 @ A4

Figure 1: General Location Plan. Scale 1:10,000



**Figure 2: Detailed Location Plan. Scale 1:1000**

### **3. Historic Environment Planning History & Background**

#### **3.1 Conservation Area**

The development area is not located in a conservation area.

### **4. Historic Background**

#### **4.1 The History of The Settlement**

Reading is named after the Readingas, Saxon followers of Reada, 'the Red', who settled in the spit of land in the fork of the Thames and Kennet in the 6th century. At the time of the Domesday Survey in 1086, Reading belonged to the king and included a small borough and two manors. Reading Abbey was founded by Henry I in 1121. The abbey dominated the town and became one of the richest religious houses in England making Reading a wealthy place, and a centre of religion and pilgrimage.

Wool and leather were Reading's principal trades in the 16th and early 17th centuries, making good use of the town's road and river links. In the 18th century Reading was an important market and coaching town; new industries developed, notably brewing, iron-founding and brick and tile making. Early 19th century maps show the town had hardly extended beyond its medieval core but a fast town expansion was stimulated by the development of new transport links. The Kennet and Avon Canal was opened in 1810 bringing London and Bristol, two major sea ports, into direct communication by water. Of much greater significance, however, was the construction of the Great Western Railway which reached the town in 1840. The coming of the railway resulted in a rapid growth of major industries, notably Huntley & Palmers and Suttons Seeds, which provided work for a rapidly increasing population.

## 5. The Building

The building is comprised of 26 and 28 Southampton Street. These are listed separately, but in their current form, the two are combined into one structure. There are no internal divisions between no. 26 and no. 28. For this reason, this report refers to both 26 and 28 together as 'the building'.



Plate 1: East aspect



Plate 2: West elevation



**Plate 3: Ground floor of 28**



**Plate 4: Ground floor of 29**



**Plate 5: First floor of 28**



**Plate 6: First floor of 29**



**Plate 7: 2nd floor of 29**

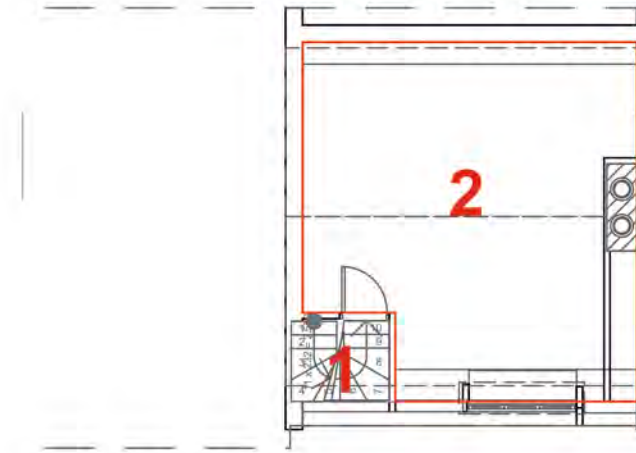


**Plate 8: Staircase from first to second floor**

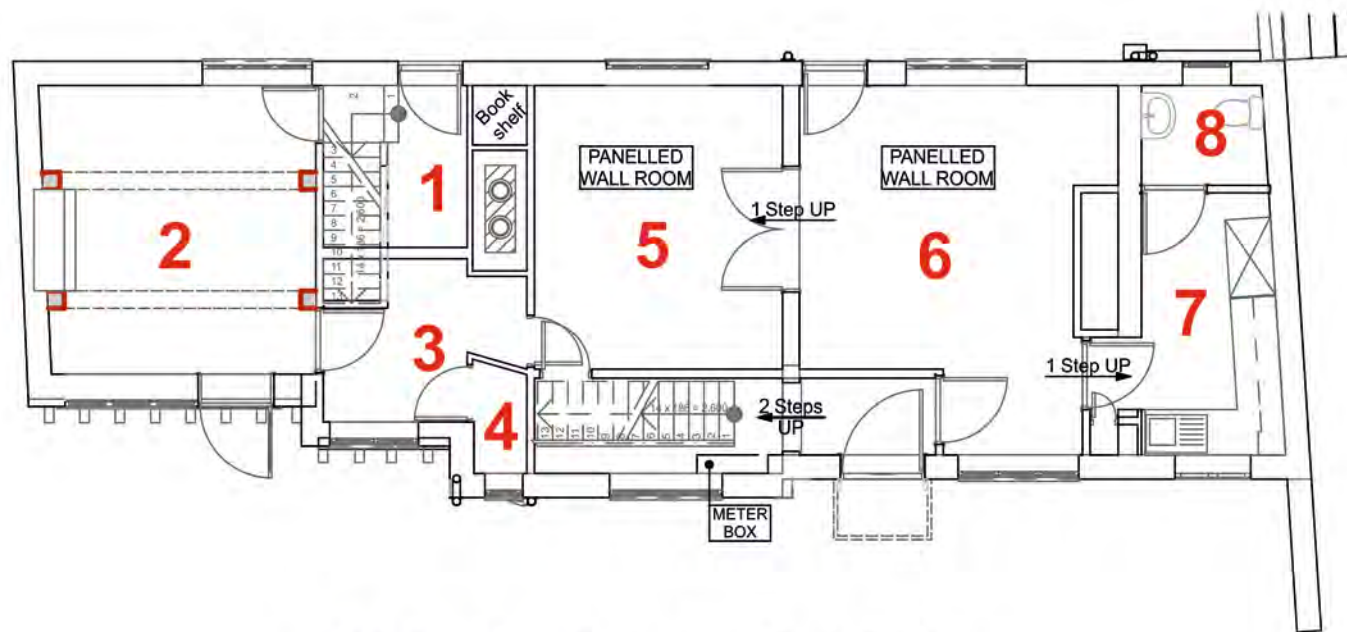
The layout of the building is shown in the following plans:



Existing First Floor Plan - Scale 1:100



Existing Second Floor Plan - Scale 1:100



Existing Ground Floor Plan - Scale 1:100

Figure 3: Floor Plan

## 5.1 Introduction

The building is a Grade II listed building and the listed building descriptions are as follows:

## 5.2 Listed Building Description

SOUTHAMPTON STREET

No 26 (West side)

2. 5128 SU 7172 NE 4/231

II 2

Early C19. 2 1/2 storeys altered. Grey brick headers with red brick dressings and quoins. Cogged eaves cornice to tiled roof. Right hand part of house original with 1 window, tripartite casement, segment headed on Ground floor and mansard roof with end chimney and dormer. Left hand part may be a C20 rebuild with slight break: 1 range of windows, 3 light casement on ground floor and a 5 light, probably reused, oak mullion casement on 1st floor; also parapet with cogged cope, no attic. To left it is treated like No 28. The garden railings are cast iron arrow head with patterned bars to gate.

Listing NGR: SU7157172975

Listing Text

SOUTHAMPTON STREET

No 28 (West Side)

1. 5128

SU 7172 NE 4/574

II 2.

Apparently C17 in fact an early C20 replica, timber framed and jettied brick infill, herring-bone below left hand 1st floor windows. Tiled roof with end chimneys. Jetty beams stop chamfered Right hand bay breaks forward slightly with 1 range of 2 light casements. Left hand bay has 3 close-set casements on 1st floor and shop window on ground floor, door panelled and stained to appear early C17.

Listing NGR: SU7157172975

## 5.3 The Building

The building is currently used as an office.

|                          |                                |
|--------------------------|--------------------------------|
| Listing Reference Number | 1113582 & 1113583              |
| Listing Grade            | II                             |
| Use Class                | Commercial                     |
| Function                 | Office                         |
| Historic Function        | House                          |
| Building Date            |                                |
| Period                   | Victorian / Modern             |
| Century                  | 19th-20th                      |
| Approximate Date         | Early 19 <sup>th</sup> Century |
| Precise Date             |                                |
| Architect                | Unknown                        |
| Architectural Style      |                                |
| Plan Form                | Altered                        |

|                           |               |
|---------------------------|---------------|
| Number of Storeys         | 2 / 3         |
| Materials                 | Brick, timber |
| Dressings                 |               |
| Roof                      | Tile          |
| Historic Features of Note |               |

#### 5.4 Trade Directories

Neither 26 nor 28 are present in a number of historic Reading street directories.

#### 5.5 The Date of the Building

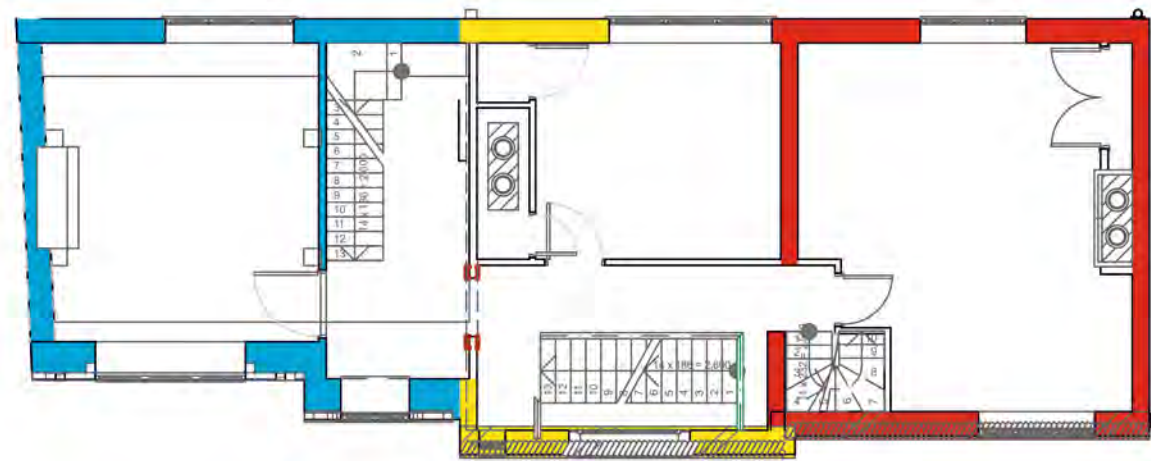
No. 26 is dated by the listing description as early 19<sup>th</sup> century with 20<sup>th</sup> century rebuilding. No. 28 is dated as early 20<sup>th</sup> century.

The early part of the building is present on the 1879 1st Edition 1:500 Ordnance Survey Plan and thus must predate the production of this map.

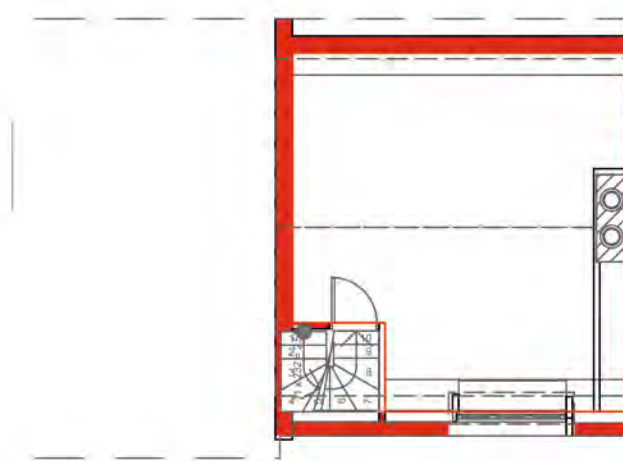
#### 5.6 The Construction Sequence

The following Phases of construction are present:

| Phase | Period                 | Date      | Description                      | How Dated                                 |
|-------|------------------------|-----------|----------------------------------|-------------------------------------------|
| 1     | Early 19th             |           | Three-storey section of building | Listing description, map evidence, fabric |
| 2     | Late 19th / Early 20th |           | Central section of building      | Listing description, map evidence, fabric |
| 3     |                        | 1912-1931 | Southern part of building        | Listing description, map evidence         |
| 4     |                        | Post 1931 | Northern extension               | Map evidence, fabric                      |
| 5     | Modern                 |           | Eastern staircase                | Planning history<br>Planning history      |

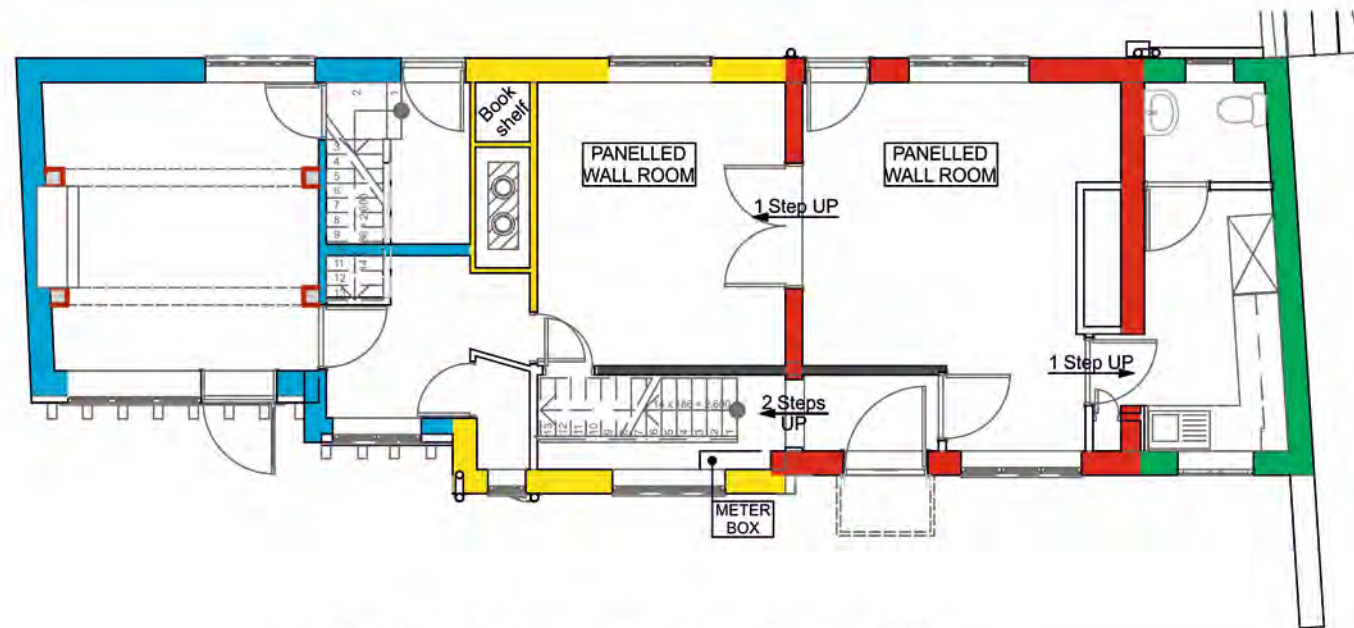


Existing First Floor Plan - Scale 1:100



Existing Second Floor Plan - Scale 1:100

- Early 19th C
- Late 19th / Early 20th C
- 1912-1931
- Post 1931
- Modern



Existing Ground Floor Plan - Scale 1:100

Figure 4: Phased floor plan, 1:100 @ A3

## 6. The Plan Form of The Building

The plan form of the building has been heavily compromised, in that what was originally two separate premises has been combined to form a single building. The original form of 26 and 28 Southampton Street is hereto unknown, as the various instances of rebuilding in the twentieth century have left no trace of the previous form of the building.

## 7. The Condition of The Building

In 1998 English Heritage launched a new strategy for dealing with Listed Buildings which were at Risk in “Buildings at Risk – A new Strategy”. This document sets out how the degree of risk that a building is subject to can be analysed. In every case a “vacant” building is the high risk category for each condition stage. English Heritage in “Buildings at Risk – A New Strategy” define the following categories of condition. The following table compares the current situation.

Very Bad means a building where there has been:

| Criterion                                            | Current Situation |
|------------------------------------------------------|-------------------|
| structural failure or instability (where applicable) | No                |
| a loss of significant areas of roof covering -       | No                |
| leading to major deterioration of the interior       | No                |
| or where there has been a major fire or              | No                |
| other disaster affecting most of the building.       | No                |

Poor means a building or structure with

|                                                               |    |
|---------------------------------------------------------------|----|
| deteriorating masonry                                         | No |
| and/or leaking roof                                           | No |
| and/or defective rainwater goods,                             | No |
| accompanied by rot outbreaks within the building              | No |
| General deterioration of most elements of the building fabric | No |
| including external joinery                                    | No |

Fair means

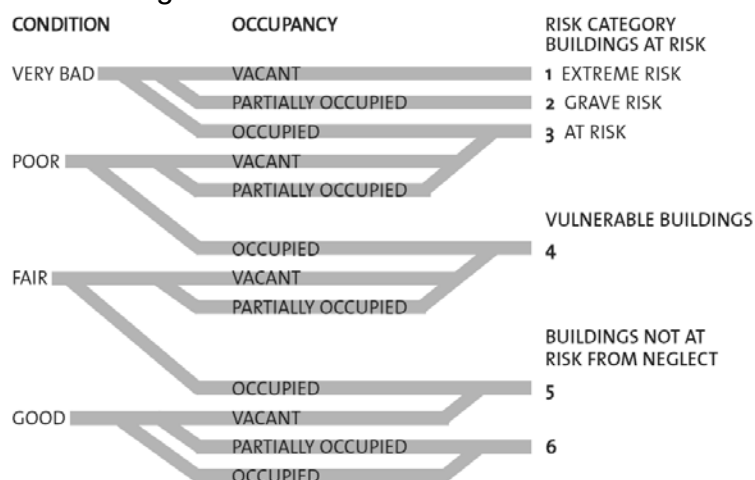
|                                              |               |
|----------------------------------------------|---------------|
| Structurally Sound                           | Yes           |
| Minor Repairs required                       | Some required |
| Shows signs of a lack of general maintenance | Yes           |

Good means

|                               |             |
|-------------------------------|-------------|
| Structurally Sound            | Yes         |
| Weathertight                  | Yes         |
| No Significant Repairs Needed | None needed |

Therefore the condition of the building is fair. The following chart shows how the different risk categories are defined.

## Historic England Risk Scale



As the building is occupied, it is, in Historic England terms, not at risk. Historic England also suggest that the rate of decay must be considered. In this case there is a real risk of decay if the building was to become vacant and especially if vandalism was to occur.

## 8. The Importance of The Building

The purpose of this section is to establish why a building is listed and thus help define the special character of the building.

### 8.1 The Importance of The Building Listing Criteria

|                                |                          |                                                                                                                                       |
|--------------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| Date                           |                          | For buildings of this date, one of the other criteria has to be clearly met.                                                          |
| Rarity of Building Type        |                          | Houses are the commonest type of historic building so this is not a factor.                                                           |
| Work of prominent Architect    |                          | This is not the work of a prominent architect.                                                                                        |
| Architectural Interest         |                          |                                                                                                                                       |
|                                | Architectural Style      | The style of the building is not exceptional.                                                                                         |
|                                | Architectural Design     | Design is not a key reason this building is listed.                                                                                   |
|                                | Decoration               | The decorative brickwork and timbers add to the interest of the building.                                                             |
|                                | Craftsmanship/Virtuosity | The building does not demonstrate a very high standard of craftsmanship.                                                              |
|                                | Innovation               | This building does not use innovative building techniques or materials.                                                               |
|                                | Significant Plan Form    | The plan form is not particularly significant.                                                                                        |
| Historic Interest              |                          | This building does not illustrate important aspects of the nation's history. It is not associated with a Nationally Important person. |
| Group Value                    |                          | There are other nearby historic buildings but this does not significantly add to the importance of the building.                      |
| Other Factors                  |                          |                                                                                                                                       |
|                                | Aesthetic Merit          | The building is aesthetically pleasing and thus this is a factor in its designation.                                                  |
| Example of Regional Specialism |                          | The building is not an example of a regional industrial specialism.                                                                   |
| Contribution of                |                          | The building is surrounded by buildings of different                                                                                  |

|         |  |                                                                    |
|---------|--|--------------------------------------------------------------------|
| Setting |  | dates and therefore there is no added importance from the setting. |
|---------|--|--------------------------------------------------------------------|

## 8.2 The Date of the Building

The DCMS 2010 document “Principles of Selection for Listing Buildings” states the reasons why buildings are listed. The date of a building is the simplest and most objective way of deciding if a building should be listed:

A key criterion is date which is as follows:

*before 1700, all buildings that contain a significant proportion of their original fabric are listed;*  
*from 1700 to 1840, most buildings are listed;*  
*after 1840, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary;*  
*particularly careful selection is required for buildings from the period after 1945;*  
*buildings of less than 30 years old are normally listed only if they are of outstanding quality and under threat.*

This building is dated to the 19<sup>th</sup> and 20<sup>th</sup> centuries and thus greater selection is necessary.

## 8.3 Rarity

The Principles of Selection state that the rarer the building the more likely it is to be listed. This building is a pair of houses and thus can be seen to be a very common type of building.

## 8.4 Architectural and Historic Interest

The Planning (Listed Building and Conservation Areas) Act 1990 Part 1 section 1 paragraph 1 states:

....”in relation to building of special architectural or historic interest.”

Thus it follows that a building must have either architectural or historic interest which the Principles of Selection define as:

*Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;*

• *Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation’s social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.*

### Architectural Interest

|                      |                                                     |
|----------------------|-----------------------------------------------------|
| Criterion:           |                                                     |
| Architectural Style  | The style of the building is not exceptional.       |
| architectural design | Design is not a key reason this building is listed. |

|                                                             |                                                                                   |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------|
| decoration                                                  | The decorative brickwork and timbers add to the interest of the building.         |
| craftsmanship;                                              | The building does not demonstrate a very high standard of craftsmanship.          |
| nationally important examples of particular building types  | The building is not a nationally important example of a particular building type. |
| particular building techniques                              | This building does not use innovative building techniques or materials.           |
| Buildings displaying technological innovation or virtuosity | This building does not display technological innovation or virtuosity.            |
| significant plan forms                                      | The plan form is not particularly significant.                                    |

#### Historic Interest

|                                                                                          |                                                              |
|------------------------------------------------------------------------------------------|--------------------------------------------------------------|
| There should normally be some quality of interest in the physical fabric of the building | There is no interest in the physical fabric of the building. |
| a building must illustrate important aspects of the nation's                             |                                                              |
| social,                                                                                  | The building does not illustrate this.                       |
| economic                                                                                 | The building does not illustrate this.                       |
| cultural                                                                                 | The building does not illustrate this.                       |
| Military history                                                                         | The building does not illustrate this.                       |

### 8.5 Group Value

The Principles of Selection gives a clear indication that buildings can be protected because they are part of group which is as follows:

*When making a listing decision, the Secretary of State may take into account the extent to which the exterior contributes to the architectural or historic interest of any group of buildings of which it forms part. This is generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between a group of buildings. If a building is designated because of its group value, protection applies to the whole of the property, not just the exterior.*

This building does not form part of a group of historic buildings.

### 8.6 Other Factors

Other factors are also taken into account; these are:

#### Aesthetic Merits

|                                                                                                                                                                                                                                                          |                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| The appearance of a building – both its intrinsic architectural merit and any group value – is a key consideration in judging listing proposals, but the special interest of a building will not always be reflected in obvious external visual quality. | The building is aesthetically pleasing and thus this is a factor in its designation. |
| Buildings that are important for reasons of technological innovation,                                                                                                                                                                                    | This building does not use innovative building techniques or materials.              |
| or as illustrating particular aspects of social or economic history, may have little external visual quality.                                                                                                                                            | The building does not illustrate particular aspects                                  |

|  |                                |
|--|--------------------------------|
|  | of social or economic history. |
|--|--------------------------------|

**Selectivity**

|                                                                                                                                                                                                                         |                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Where a building qualifies for listing primarily on the strength of its special architectural interest, the fact that there are other buildings of similar quality elsewhere is not likely to be a major consideration. | The building does not exhibit special architectural interest.               |
| However, a building may be listed primarily because it represents a particular historical type in order to ensure that examples of such a type are preserved.                                                           | Houses are the commonest type of historic building so this is not a factor. |
| Listing in these circumstances is largely a comparative exercise and needs to be selective where a substantial number of buildings of a similar type and quality survive.                                               | The building is not considered to be an exceptional example.                |
| In such cases, the Secretary of State's policy is to list only the most representative or most significant examples of the type.                                                                                        | The building is not considered to be representative or significant.         |

**National Interest**

|                                                                                                                                                                                                                                                                                                                            |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| The emphasis in these criteria is to establish consistency of selection to ensure that not only are all buildings of strong intrinsic architectural interest included on the list, but also the most significant or distinctive regional buildings that together make a major contribution to the national historic stock. | The building is not an example of a regional industrial specialism. |
| For instance, the best examples of local vernacular buildings will normally be listed because together they illustrate the importance of distinctive local and regional traditions.                                                                                                                                        | The building is not an example of local and regional traditions.    |
| Similarly, for example, some buildings will be listed because they represent a nationally important but localised industry, such as shoemaking in Northamptonshire or cotton production in Lancashire.                                                                                                                     | Houses do not represent an industry.                                |

**8.7 The Importance of Particular Types of Building**

Historic England have produced "Selection Guides" for different types of building. The relevant ones are:

Town Houses – Domestic Buildings 2

The Modern House and Housing – Domestic Buildings 4

**8.8 The Significance of The Building Understanding Heritage – Values Conservation Principles Policies and Guidance 2008 Method**

|            |              |                                                                                                            |
|------------|--------------|------------------------------------------------------------------------------------------------------------|
| Evidential |              | The building dates from a period when the physical evidence of the building adds little novel information. |
| Historical |              |                                                                                                            |
|            | Illustrative | The building does not illustrate an unusual historic connection.                                           |
|            | Association  | Low<br>The building is not associated with a notable person, family, event, movement or cultural heritage. |

|           |                           |                                                                                                             |
|-----------|---------------------------|-------------------------------------------------------------------------------------------------------------|
| Aesthetic |                           |                                                                                                             |
|           | Design                    | Design is not a key reason this building is listed.                                                         |
|           | Detailing & Craftsmanship | The building does not demonstrate a very high standard of craftsmanship.                                    |
|           | Architect                 | The building is not the work of a prominent architect.                                                      |
|           | Innovation                | This building does not use innovative building techniques or materials.                                     |
| Communal  |                           | Low – The building is visible from the public realm so it does have a communal value albeit a very low one. |

## 9. The Contribution to Significance made by the Setting of the Building

### 9.1 The Definition of Setting

The National Planning Policy Framework defines setting as follows:

**Setting of a heritage asset:** *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*

English Heritage (now Historic England) have produced in recent years a number of documents detailing how setting should be analysed - the latest of these is:

Historic England, 2015, *The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning 3*.

The principal difference is that it notes a number of different methods of analysis are suitable as opposed to just those set out in:

*History in The View: A method for assessing heritage significance within views*" (Written 2008 Published 2011).

*The Setting of Heritage Assets: English Heritage Guidance* (2011).

### 9.2 The Setting of The Building & The Surrounding Area

The building is located at a busy city centre road junction amongst buildings of varying dates. The majority of the surrounding buildings are modern however some buildings from the 19th century are present. The nearby Church of St Giles, although having medieval origins, was almost entirely rebuilt in the 19<sup>th</sup> century.

The setting has been greatly altered in the latter part of the 20<sup>th</sup> century from being the periphery of an industrial area to the periphery of an area focused on retail developments around the River Kennett. It is therefore badly compromised.

## **10. Proposals and Conclusions**

The current function of the building is as commercial offices. When the building was constructed its function was a pair of houses.

The special character of 26 & 28 Southampton Street solely lies in the appearance of the eastern façade of the building which has an apparent historic appearance.

It is proposed to convert the building from commercial offices to residential use, with two flats and one house to be formed from the internal space.

The proposed plans are reproduced overleaf.

The proposals will have no effect on the setting of the building.

The building will be returned to its former use as a residential property, and owing to the extensive internal alterations that have already occurred, little impact to the historic fabric will be caused by the proposed work.

The proposals are therefore positive.

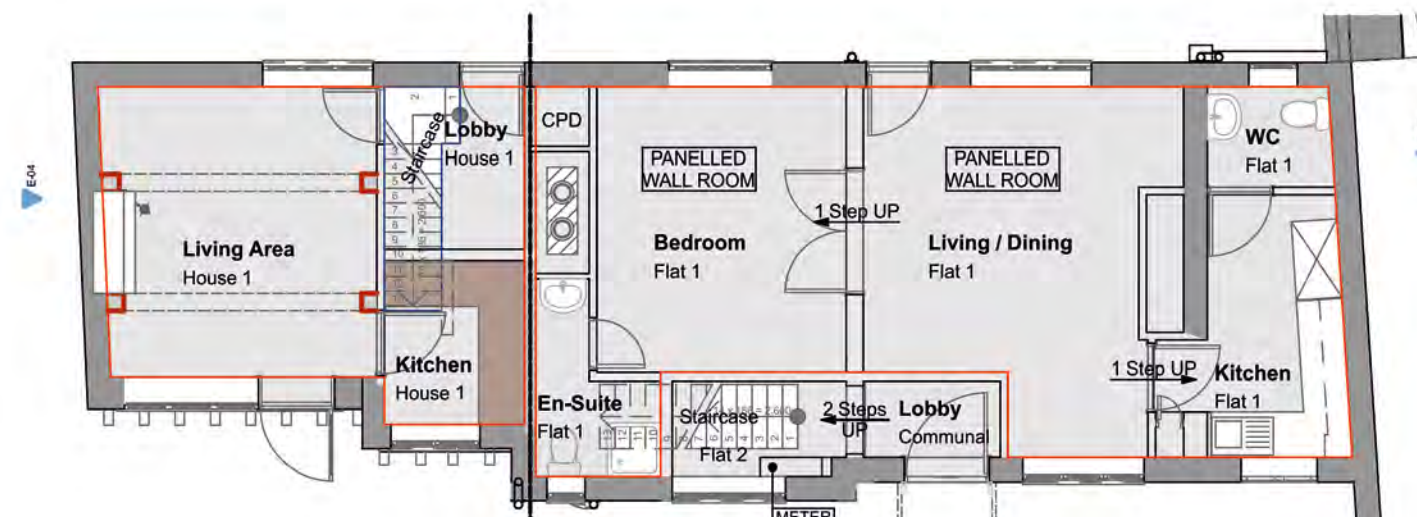


Figure 5: Proposed Floor Plan, 1:100 @ A3

## 11. Appendix: Map Regression Exercise

### 11.1 1879 Ordnance Survey Map

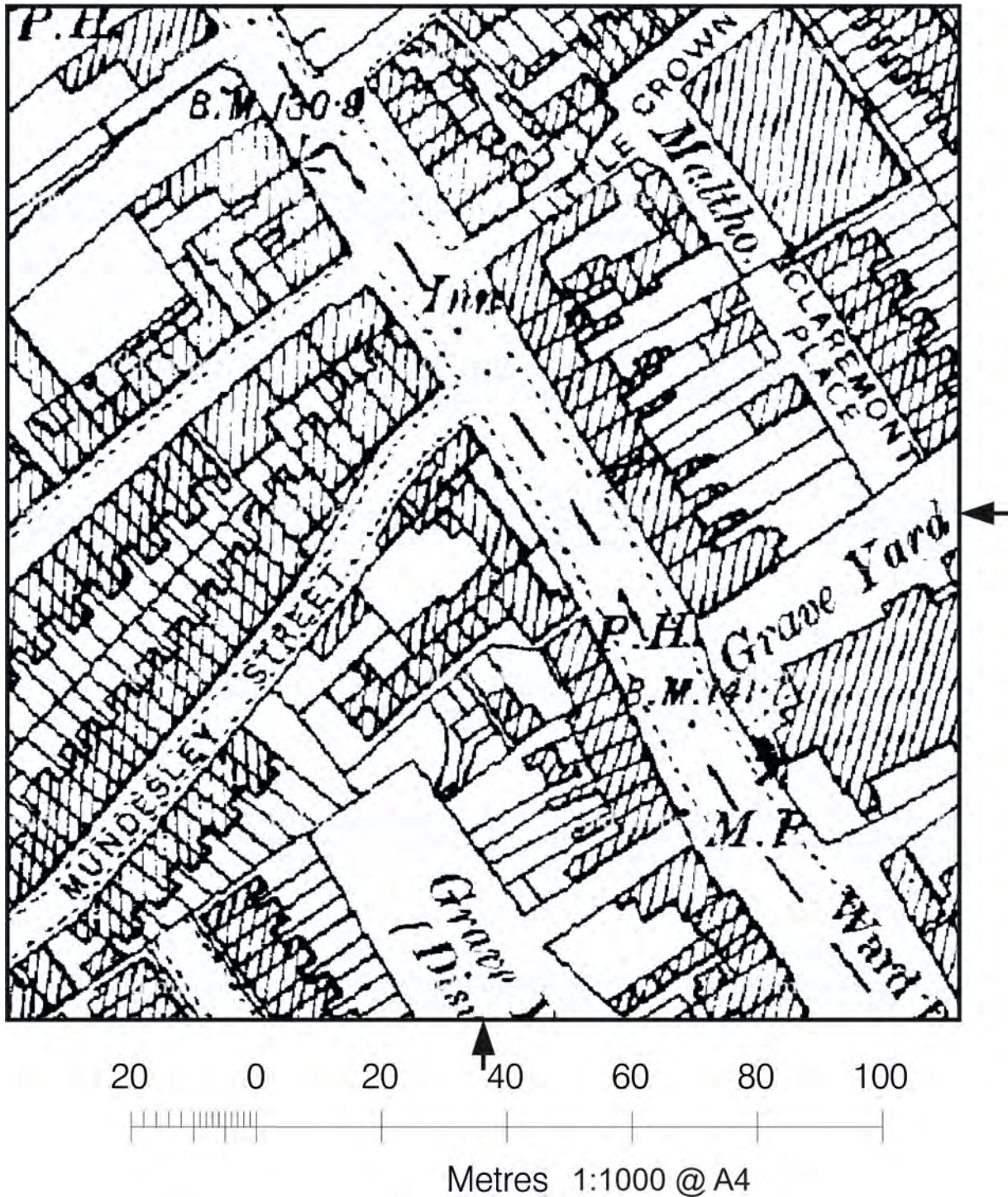


Metres 1:1000 @ A4

**Figure 6: 1879 Ordnance Survey 1:500 map, reproduced at 1:1000**

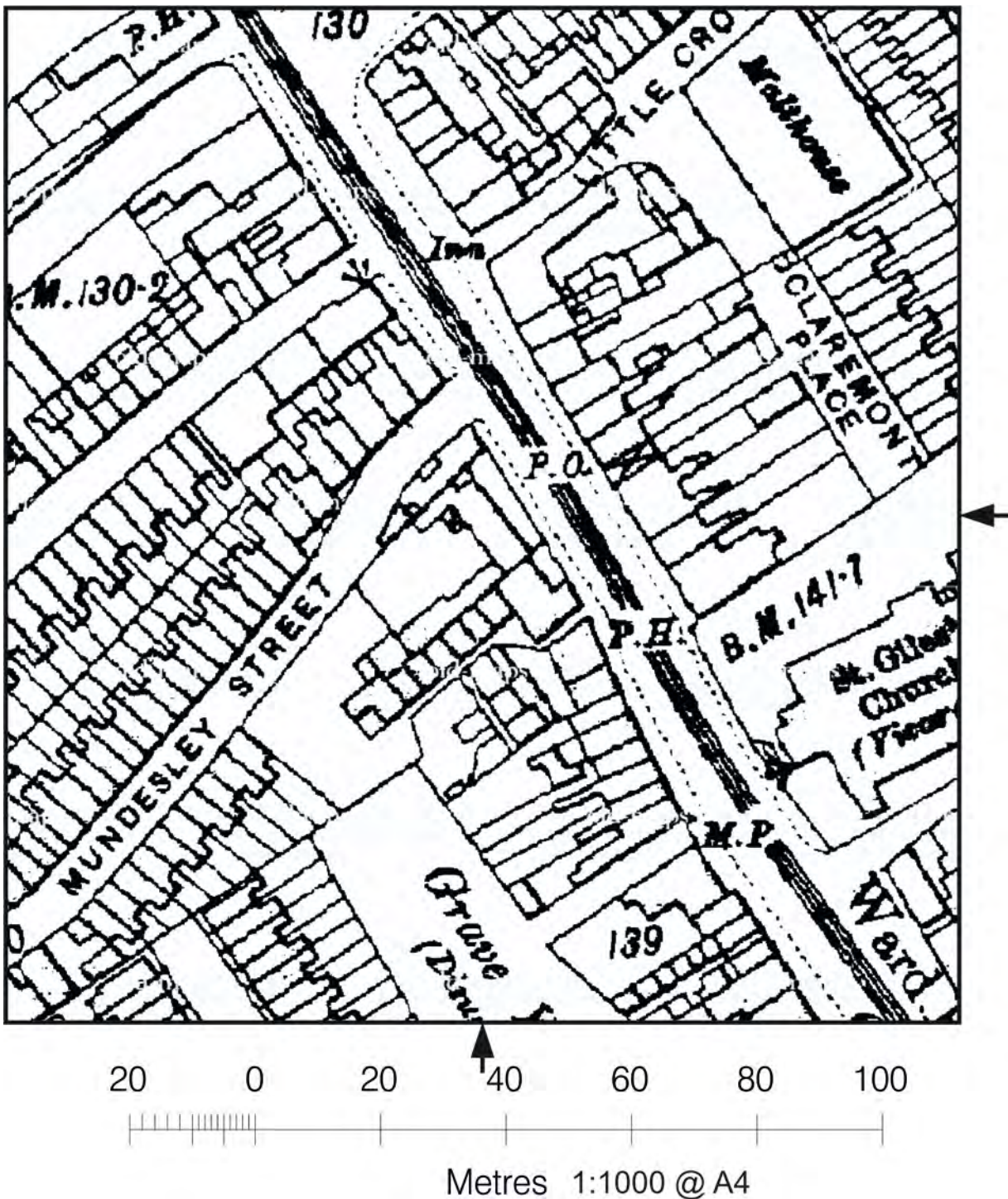
Two buildings are present in the location of the current building, with a straight eastern façade. A through-passage is present to the south.

## 11.2 1899 Ordnance Survey Map



**Figure 7: 1899 Ordnance Survey 1:2500 map, reproduced at 1:1000**  
The through-passage is shown as blocked.

### 11.3 1912 Ordnance Survey Map



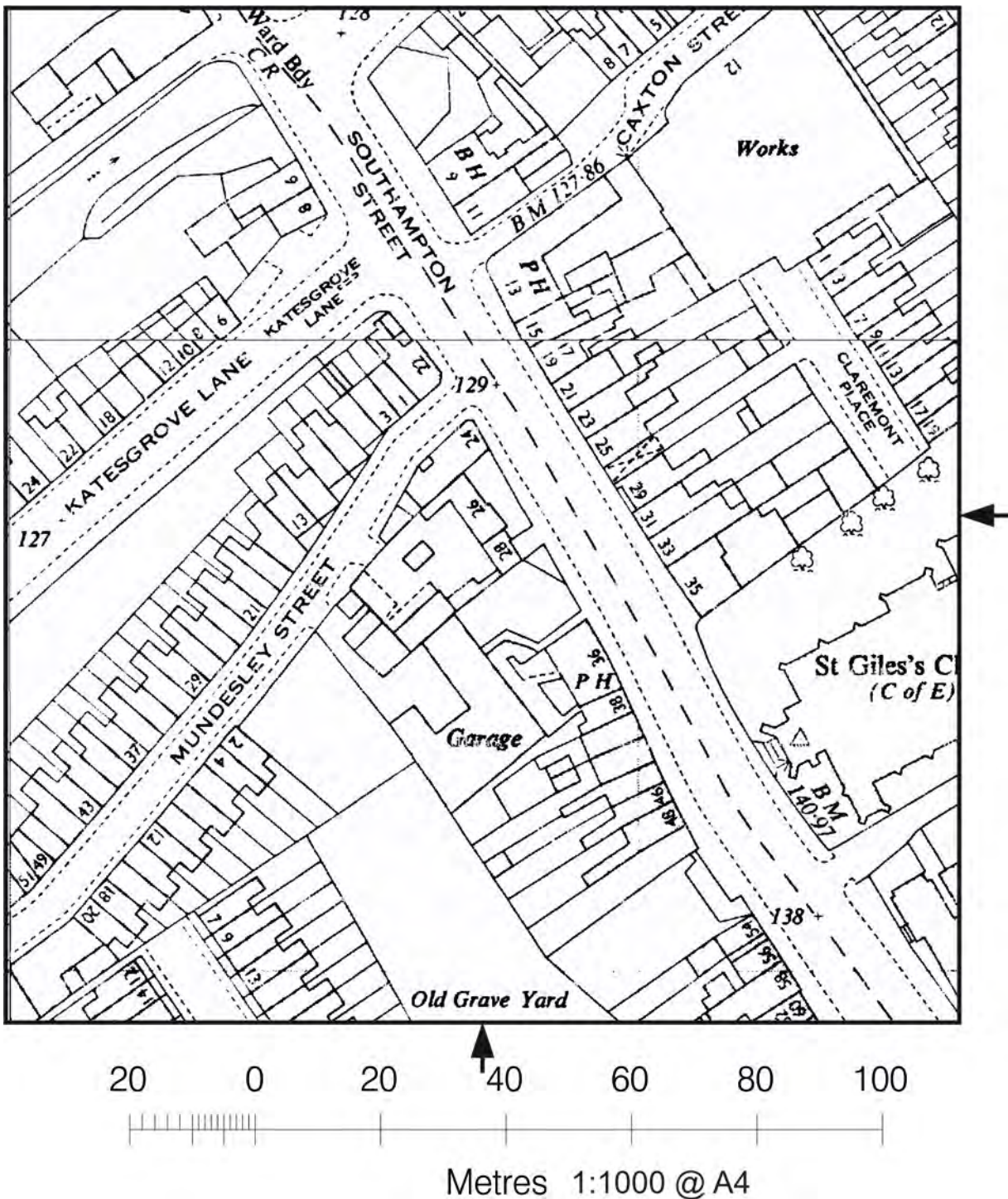
**Figure 8: 1912 Ordnance Survey 1:2500 map, reproduced at 1:1000**  
There is no change from the previous map.

#### 11.4 1931 Ordnance Survey Map



**Figure 9: 1931 Ordnance Survey 1:2500 map, reproduced at 1:1000**  
Buildings to the southwest of the building are no longer depicted.

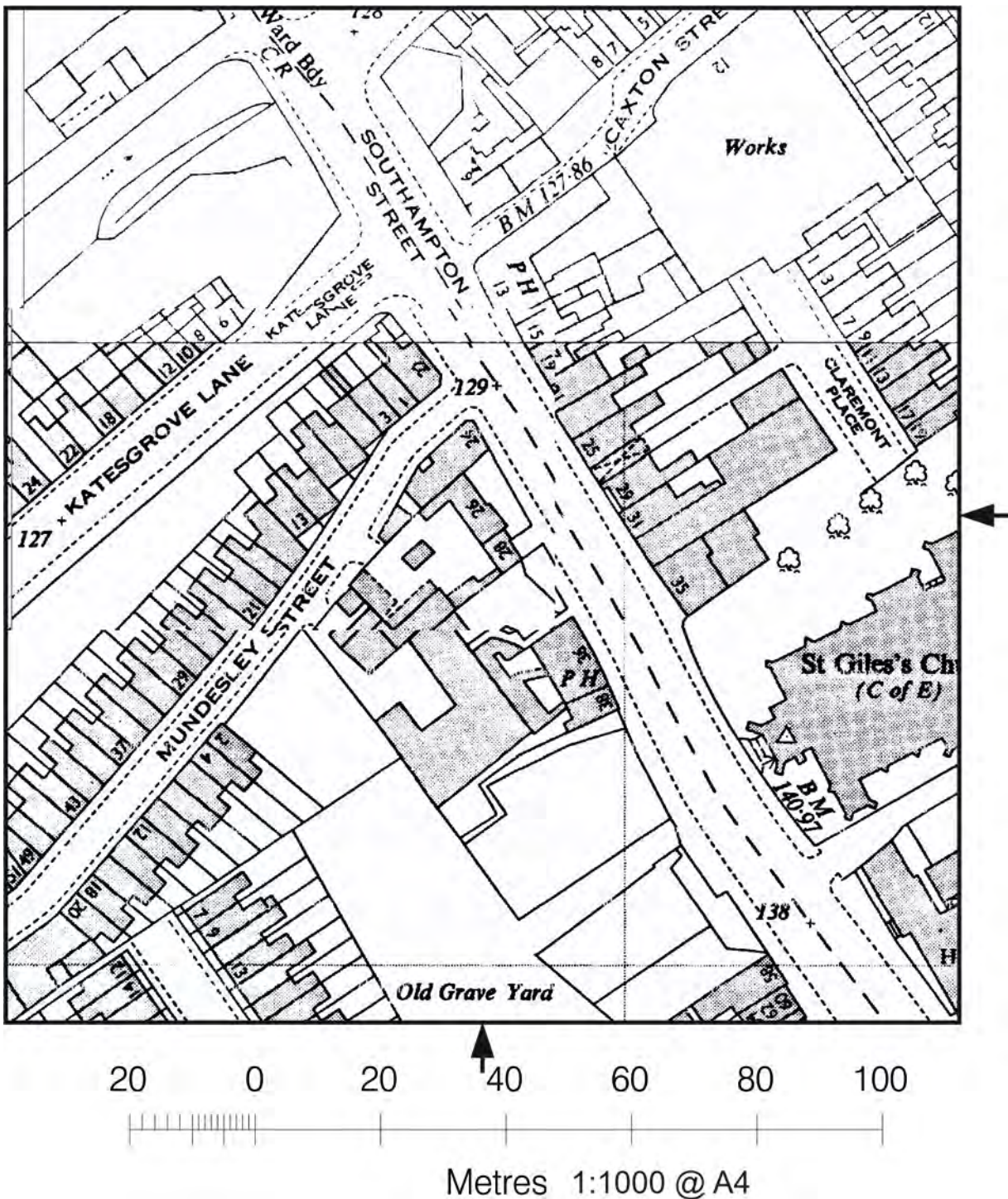
## 11.5 1957-8 Ordnance Survey Map



**Figure 10: 1957-8 Ordnance Survey 1:1250 map, reproduced at 1:1000**

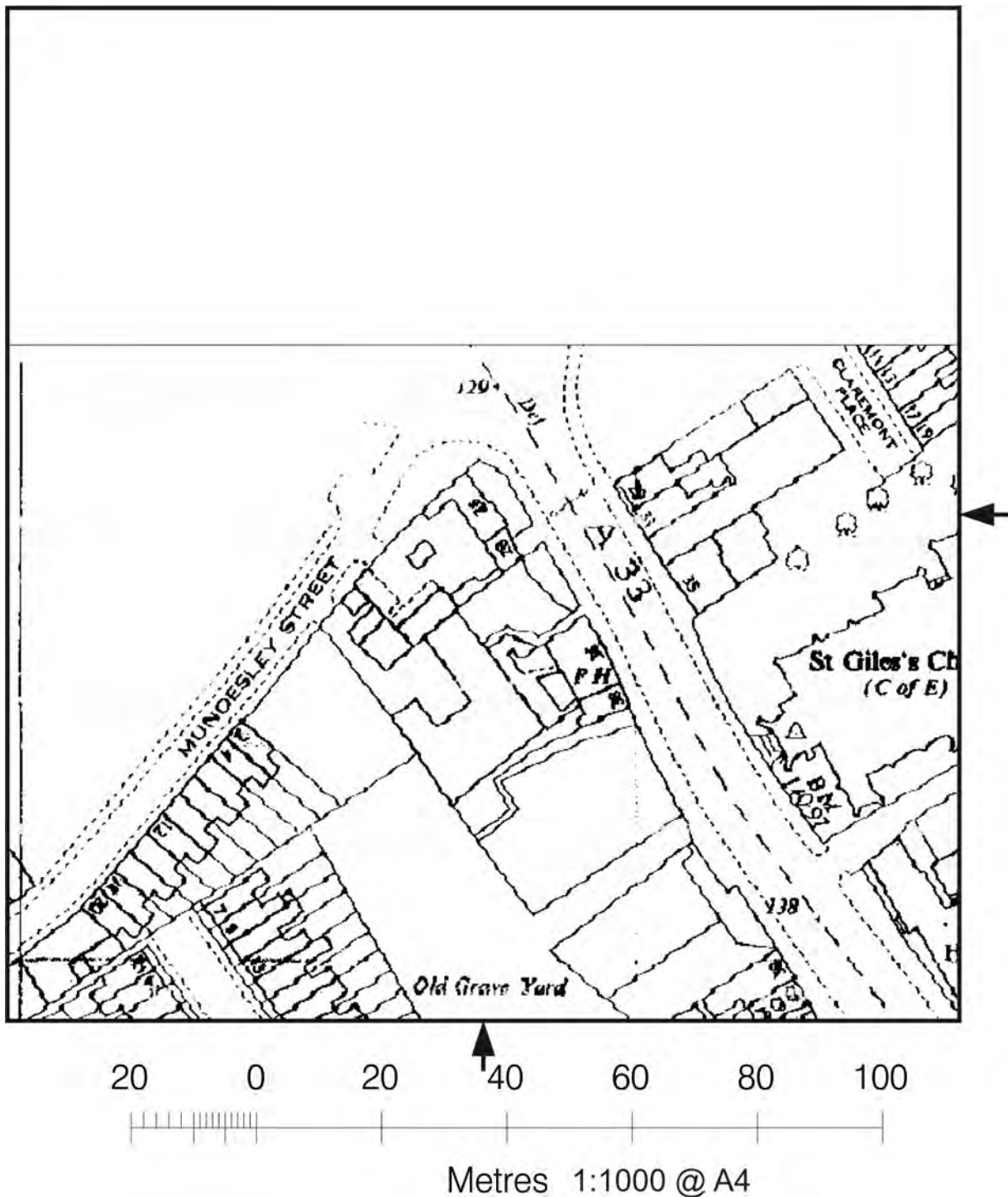
The façade of the building is now not shown as straight indicating rebuilding has occurred.

## 11.6 1962-9 Ordnance Survey Map



**Figure 11: 1962-9 Ordnance Survey 1:1250 map, reproduced at 1:1000**  
There is no change from the previous map.

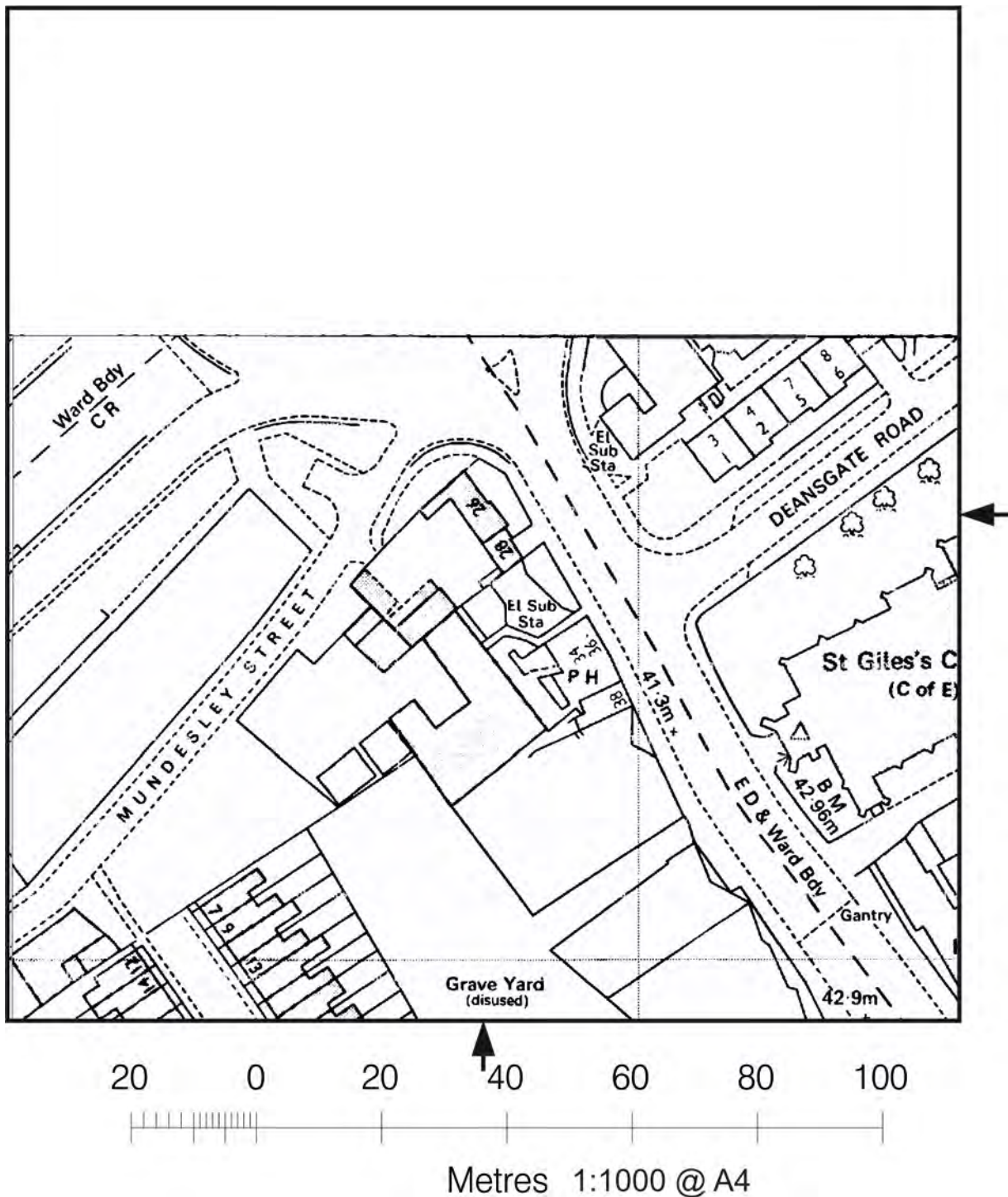
## 11.7 1971 Ordnance Survey Map



**Figure 12: 1971 Ordnance Survey 1:2500 map, reproduced at 1:1000**

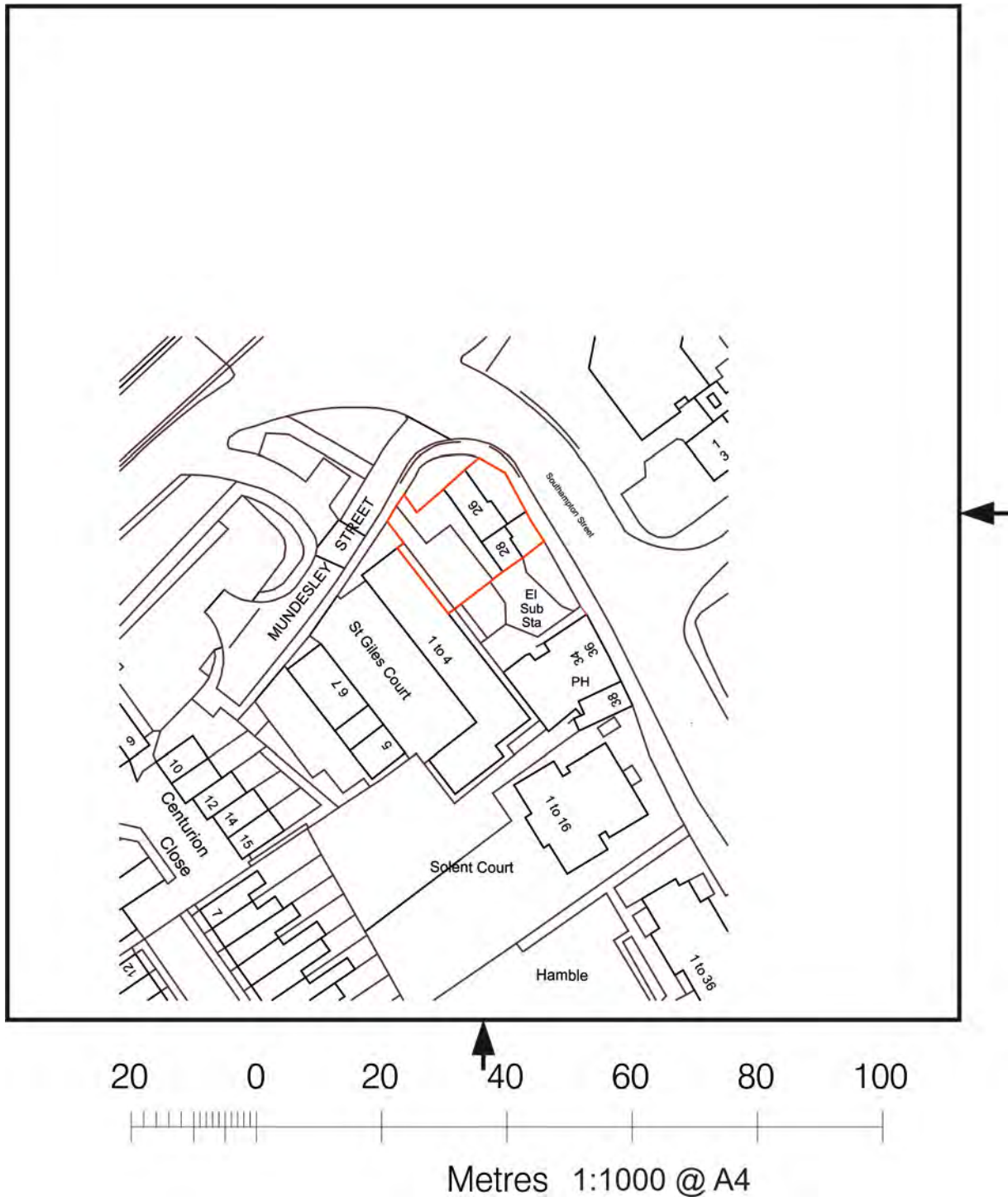
Despite the quality of this map, there is no apparent change from the previous map.

## 11.8 1982 Ordnance Survey Map



**Figure 13: 1982 Ordnance Survey 1:1250 map, reproduced at 1:1000**  
The layout of outbuildings has changed.

## 11.9 Modern Ordnance Survey Map



**Figure 14: Modern Ordnance Survey 1:2500 map, reproduced at 1:1000**  
The building is depicted in its current form.

**12. Appendix: Definitions:**

| Term                           | Definition                                                                                                                                                                                                                                  |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Archaeology                    | The study of past human activities, before the end of the post medieval period at 1700 AD, from the material remains which these activities produce.                                                                                        |
| Remains                        | Includes any sign or trace of the thing in question.                                                                                                                                                                                        |
| Archaeological Site            | The place or position occupied by, and the place where, physical remains of past human activity, including those remains, can be discovered.                                                                                                |
| Evaluation                     | Small scale inexpensive trial archaeological excavation carried out before planning permission is granted in order to determine the weight that ought to be placed upon the preservation of an archaeological site.                         |
| Industrial Archaeology         | The study, using archaeological methods, of industrial processes from ancient times to the present day.                                                                                                                                     |
| Mitigation Strategy            | A strategy for ameliorating the effects of a development on an archaeological site, by means of a foundation design which reduces the amount of ground disturbance, or a programme of archaeological investigation, recording and research. |
| Preservation in situ           | The physical preservation of archaeological remains and sites in the place where they are to be found.                                                                                                                                      |
| Planning Archaeologist         | The person who advises the Local Planning Authority on archaeological matters. This may be somebody within the authority but can be an external post in a County Council, Historic England or another body.                                 |
| <i>Period Definitions:</i>     |                                                                                                                                                                                                                                             |
| Neolithic                      | Circa 4000-2500BC uncalibrated radio-carbon years                                                                                                                                                                                           |
| Earlier Bronze Age             | 2500-1200 BC                                                                                                                                                                                                                                |
| Later Bronze Age               | 1200-800 BC                                                                                                                                                                                                                                 |
| Iron Age                       | 800 BC-50 AD                                                                                                                                                                                                                                |
| Romano-British                 | 50 AD-410 AD                                                                                                                                                                                                                                |
| Early Medieval                 | 410 AD-1086                                                                                                                                                                                                                                 |
| Medieval                       | 1086-1485                                                                                                                                                                                                                                   |
| Post Medieval                  | 1485-1700                                                                                                                                                                                                                                   |
| Tudor                          | 1485-1558                                                                                                                                                                                                                                   |
| Jacobean                       | 1603-1702                                                                                                                                                                                                                                   |
| Georgian                       | 1702-1837                                                                                                                                                                                                                                   |
| Early Modern (Imperial)        | 1700-1837                                                                                                                                                                                                                                   |
| Victorian                      | 1837-1901                                                                                                                                                                                                                                   |
| Modern                         | 1901-present day                                                                                                                                                                                                                            |
| <i>Geological definitions:</i> |                                                                                                                                                                                                                                             |
| Particle sizes                 | The Wentworth Scale is used                                                                                                                                                                                                                 |
| Made Ground                    | Non natural deposits which may have the potential to be archaeological remains. It is noted that the identification of made ground as being modern is the prerogative of archaeologists.                                                    |

## 13. Legislative and Policy Background

### 13.1 Word Definitions

There is a difference between the meaning of the word significance in Government Documents and its meaning in Historic England (formerly part of English Heritage) documents. **Significance** is defined by the pocket Oxford Dictionary as *noun importance; meaning*.

In this report when the word **Significance** is used as having the meaning as indicated in Government documents it is denoted as **Significance**. When significance is being used in the manner suggest by Historic England it is denoted *Significance (HE)*.

### 13.2 The Historic Environment System

It has to be accepted that there is a hierarchy of Legislation; Government Planning Policy issued by the Department of Communities, Government Heritage Policy issued by the Department of Culture Media and Sport, and advice issued by Historic England; to be followed when making a planning decision.

This has led to a complex system which is sometimes contradictory. This has been made worse because a new Heritage Act was planned but never presented to Parliament. Instead the existing legislative framework was supplemented by changes to Planning Policy to reflect what was intended to be in the new Act.

The Key reform of the proposed Act was a unified designation system for all Historic and Archaeological entities ranging from half a million year old habitation sites to post 1980s offices, including parks and shipwrecks and aircraft.

### 13.3 Historic Building and Monuments Commission (England)

In 1984 the government set up an autonomous agency to undertake its functions in relation to Ancient Monuments, Archaeology, Listed Buildings, Historic Parks and similar, except for the formal designation of these which remained in the hands of the relevant minister. This body became known as English Heritage.

In 1999 The Historic Building and Monuments Commission (England) merged with the Royal Commission on the Historic Monuments of England and the National Monuments Record.

On 1st April 2015 English Heritage was split into two organisations:

- English Heritage Trust which took over the management of Historic Properties owned or operated by the state.
- Historic England which remains an Agency of Government which has all the other functions of English Heritage.

While this was called a rebranding exercise many policy and other documents have been re-issued and many included revisions. There are over 100 Historic English Policy Documents see: [Advice and Guidance: New titles and backlist](#)

In the period 15/2/2016 to 15/9/2016 twenty-nine new policy documents were issued, that is over one per week.

### 13.4 Planning (Listed Buildings and Conservation Areas) Act 1990 Listed Buildings

This Act sets out the legal basis for the protection of buildings of special architectural or historic interest – ie the process of listing. (Chapter 1 section 1 paragraph 1)

Chapter 2 Section 16 paragraph 2 states:

*(2) In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.*

This section states that it is **DESIRABLE** to protect the setting of listed buildings but crucially “setting” is not defined.

### **13.5 Planning (Listed Buildings and Conservation Areas) Act 1990 Conservation Areas**

Part 2 Section 69 paragraph 1 states

*Every local planning authority —*

*(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance,*

Section 74 requires permission for demolition of any building in the Conservation Area.

It is noted that the settings of Conservation Areas are not protected in the same way as Listed Buildings. The Act (Section 72 paragraph 1) instead places the following duty:

*(1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*

That is the 1990 Act does not protect the Setting of Conservation Areas.

### **13.6 The 2007 Heritage White Paper and English Heritage 2008 Document Conservation Principles, Policies and Guidance**

The Government's Intent for Heritage Reform was set out in the White Paper: Heritage Protection for the 21st Century (March 2007). This proposed a single national Register of historic buildings and sites of special architectural, historic or archaeological interest, which will include all those places currently on the statutory list of buildings of special architectural or historic interest and the schedule of monuments, and the non-statutory registers of historic Parks and Gardens.

The 2007 White Paper defined “Heritage Assets” for the first time. The 2008 *Draft Heritage Protection Bill* defined

**2 Heritage structures** *(a) a registrable structure in England which English Heritage considers to be of special historic, archaeological, architectural or artistic interest*

**Open Space**

*(a) a registrable open space in England which English Heritage considers to be of special historic, archaeological, architectural or artistic interest; or*

The Bill also noted that other factors could not be taken into account.

Conservation Areas were not included in the draft bill. Of importance is the fact that there were two different types of Heritage Assets which recognised the difficulty in having a single definition of Heritage Asset.

In 2008 English Heritage published the document 2008 Conservation Principles, Policies and Guidance For the Sustainable Management of The Historic Environment.

In the foreword is the following statement:

*Our main purpose in producing the Principles, Policies and Guidance is to strengthen the credibility and consistency of decisions taken and advice given by English Heritage staff, improving our accountability by setting out the framework within which we will make judgements on casework. Our success will also be measured by the extent to which this document is taken up more widely in the sector. Over time, and in conjunction with legislative reform and improving capacity in the sector, we hope that the document will help to create a progressive framework for managing change in the historic environment that is clear in purpose and sustainable in its application – constructive conservation.*

It is noted that this document was produced on the basis that Heritage Law would be changed.

It was not intended as Government advice on Heritage Management it was a guide to how English Heritage would make decisions in their role as advisors to Government.

This document introduces the concept of “Heritage Value”. The document also suggests, in para 25:

*We have therefore deliberately avoided the specialised terminology of current law and public policy relating to heritage designations,*

*In the proposed new national system of cultural heritage protection, ‘reasons for designation’ will set out why each ‘historic asset’ is above the threshold for designation for its ‘architectural, historic or archaeological interest’. Grounds for designation will necessarily be confined to specific values under these headings, directly related to published selection criteria. The statutory basis of designation will, however, be sufficiently broad to embrace the range of values which the Principles identify as desirable to take into account in the management of significant places.*

Paragraph 74 recognises the incompatibility of their own methodology with English Law which states:

*The contribution of such objects and archives, including evolving collections, should be articulated, even if they are currently held elsewhere, and regardless of whether their contribution falls within the scope of statutory protection.*

### **13.7 2010 DCMS Circular - Principles of Selection for Listing Buildings**

This document remains in force and was not superseded by the Framework. Of importance is the statement in para 1

*The Secretary of State cannot take any other factors into account when considering his decision*

Para 9 states

*The Secretary of State uses the following criteria when assessing whether a building is of special interest and therefore should be added to the statutory list:*

- *Architectural Interest. To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;*
- *Historic Interest. To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural, or military history and/or have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.*

### **13.8 2010 Planning Policy Statement 5 - Non Designated Heritage Assets**

When the Government decided it was not going to take forward the New Act, it decided that 95% of its objectives could be achieved by a reform of planning advice. A new integrated Planning Policy Statement was issued replacing:

1. PPG15 Planning and the Historic Environment
2. PPG16 Planning and Archaeology

### **13.9 Heritage Assets**

Of importance is the fact that the concept of Heritage Assets was introduced and a distinction made between designated and undesignated Heritage Assets. Designated assets are as follows:

1. World Heritage Site
2. Scheduled Ancient Monument
3. Listed Building
4. Protected Wreck Site
5. Registered Park and Garden
6. Registered Battlefield
7. Conservation Area

Heritage Assets were defined more broadly as:

*A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in this PPS) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).*

A key purpose of this was to enable the protection of the vast numbers (circa 90%) of archaeological sites not protected as Nationally Important Scheduled Ancient Monuments.

The National Planning Policy Framework 2012 revised this definition slightly:

*Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).*

### 13.10 Above Ground Undesignated Heritage Assets

Thus the definition of an undesignated Heritage Asset is clear – only a Local Planning Authority can identify an undesignated Heritage Asset.

The following are considered to be undesignated (non Archaeological) Heritage Assets:

1. Locally Listed Buildings
2. Identified as Heritage Assets in other Local Planning Authority documents
3. Other buildings suggested to be Heritage Assets by the Local Authority during consultations about this proposal
4. Buildings recorded as making a positive contribution to the special historic or architectural character or appearance of a conservation area.

Mention of a building in the Historic Environment Record does not make a building a Heritage Asset because:

1. It may not exist
2. It may not be historic (a building may be included in the HER because archaeological work has been undertaken there)
3. The owners and occupiers have a right to be informed that a building has been identified as a Heritage Asset.

### 13.11 2018 The National Planning Policy Framework

The 2018 National Planning Policy Framework was designed to simplify planning policy and in particular make it clear that there was a presumption in favour of sustainable development. It also noted that the public benefit from job creation and economic wellbeing, as well as house construction and mineral extraction, should be taken into account.

### 13.12 DCMS 2014 document Planning Practice Guidance

The DCMS 2014 document Planning Practice Guidance contains the Document ***Conserving and Enhancing the Historic Environment***. The purpose of this document is to amplify and clarify the Framework.

### 13.13 2015 Historic Environment Good Practice Advice in Planning

In 2015 Historic England published three guides to Good Planning Practice these were:

1. The Historic Environment in Local Plans
2. Managing Significance in Decision-Taking in the Historic Environment
3. The Setting of Heritage Assets

### 13.14 Determining Importance and Significance

The Importance of Buildings is considered with reference to the 2010 DCMS *Circular - Principles of Selection for Listing Buildings*. This document remains in force and was not superseded by the Framework. The Historic England Designation Guides follow these guidelines and thus the importance of buildings is determined by Para 9 which states:

*“The Secretary of State uses the following criteria when assessing whether a building is of special interest and therefore should be added to the statutory list:*

- ***Architectural Interest.*** *To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms;*
- ***Historic Interest.*** *To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural, or military history and/or*

*have close historical associations with nationally important people. There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing."*

The Framework defines **Significance** as follows:

**Significance (for heritage policy):** *The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. **Significance** derives not only from a heritage asset's physical presence, but also from its setting.*

The Planning Practice Guide states:

**Significance** in terms of heritage policy is defined in the Glossary of the National Planning Policy Framework. (<https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>)

*In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of the identified heritage asset's **significance**. Some of the more recent designation records are more helpful as they contain a fuller, although not exhaustive, explanation of the significance of the asset. (Conserving and enhancing the historic environment - GOV.UK Page 3 of 24)*

In considering the importance or **significance** of a building this is the starting point, not that set out in the English Heritage Document 2008 *Conservation Principles, Policies and Guidance For the Sustainable Management of The Historic Environment* or more recent English Heritage or Historic England Documents.

The Historic England (2016) Document "Managing *Significance* in Decision Taking in the Historic Environment" contains the following important statement in paragraph 13:

*The reason why society places a value on heritage assets beyond their mere utility has been explored at a more philosophical level by English Heritage in Conservation Principles (2008). Conservation Principles identifies four types of heritage value that an asset may hold:*

- *aesthetic,*
- *communal,*
- *historic*
- *and evidential value.*

*This is simply another way of analysing its significance. Heritage values can help in deciding the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.*

This is clear statement that **Significance** in the framework has a different meaning to *Significance* in English Heritage and Historic England document. Indeed the organisation Civic Voice in 2010 commented:

*Use of English Heritage Conservation principles*  
6. *We do not find it helpful that the draft guidance relates more to English Heritage's own conservation principles than the Government's spatial planning policy and urge much closer consideration of PPS1 and PPS5 in particular. We do*

*not find the conservation principles helpful outside a small group of conservation experts*

*7. The conservation principles would need substantial rewriting into a more suitable language and approach if they are to integrate well with spatial planning – moving beyond being an almost academic discussion of conservation to become a practical tool for development management, place making and policy development.*

*[http://www.civicvoice.org.uk/uploads/files/Setting\\_of\\_heritage\\_assets\\_-\\_Civic\\_Voice\\_response\\_to\\_English\\_Heritage\\_-\\_October\\_2010.pdf](http://www.civicvoice.org.uk/uploads/files/Setting_of_heritage_assets_-_Civic_Voice_response_to_English_Heritage_-_October_2010.pdf)*

*“Managing Significance in Decision Taking” 2016 goes onto to say:*

*What do we mean by 'significance' and 'heritage values'?*

*The idea of 'significance' lies at the core of these principles. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape.*

*'Conservation Principles' sets out a method for thinking systematically and consistently about the heritage values that can be ascribed to a place. People value historic places in many different ways; 'Conservation Principles' shows how they can be grouped into four categories:*

*Evidential value: the potential of a place to yield evidence about past human activity.*

*Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative.*

*Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.*

*Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.*

*<https://www.historicengland.org.uk/advice/constructive-conservation/conservation-principles>*

### **13.15 The Degree of Harm**

The framework established three degrees of harm:

1. Substantial Harm
2. Less than substantial harm
3. No Harm

The Framework, however, does not fully define what the criteria for each of these categories are. In paragraph 133 a distinction is made between “total loss of **significance**” and “substantial harm” to the **significance**.

Paragraph 132 states that:

*Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest **significance**, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Paragraph 133 states that:

*133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

Paragraph 134 states that:

*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.*

The DCMS 2014 document Planning Practice Guidance states:

*Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*

*While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.*

This is to be compared with the statement in the Historic England 2016 document paragraph 27 which states that:

*"Substantial harm is a high test which may not arise in many cases. In those cases where harm or loss is considered likely to be substantial (NPPF, Paragraph 132 & PPG 01-7), then the LPA will need to consider the relevant NPPF tests."*

Clearly "total loss" means the total physical destruction. This is made clear in the document Historic England 2017 "Removing a Building from the List" which states

*Extra care is needed with fire-damaged buildings. Experience shows that special interest may remain even when considerable damage has been done to the fabric, both by fire and by the use of water to put the fire out.*

In contrast paragraph 52 states:

*Opportunities to enhance assets, their settings and local distinctiveness*

*52 Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through*

*development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.*

Thus a fourth degree of “harm” is introduced that is enhancement.

The framework makes it clear that harm to a Heritage Asset can be overcome by Public Benefits including the Long Term Preservation of the Building or Implementing the Optimum Viable Use of a Building compatible with the building’s conservation.

In fact, in the case of buildings, the situation is far more complex when other aspects of Legislation are taken into account. In particular account has to be taken of whether the harm is necessary for reasons of:

1. Health and Safety
2. To ensure the preservation and survival of the building

There are thus seven types of harm:

1. Total Loss
2. Substantial Harm
3. Less than Substantial Harm
4. Harm
5. Non Harmful but requiring listed building consent
6. Non Harmful ie things which do not need listed building consent.
7. Positive

Substantial Harm has to be

1. Things which mean that the heritage asset would no longer merit the designation ie replacing all the historic fabric
2. Things that make the asset unrecognisable.

Substantial Harm can be:

1. The cumulative effect of many minor harmful actions.

Substantial Harm is not:

1. Things that Historic England suggest can be done to buildings in their policy documents, for example extending a building or sub-dividing a building
2. Something that most authorities allow.

The Harm has to be weighed against:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; (paragraph 126)*

The following is justification for substantial harm (Paragraph 133):

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

### **13.16 Public and Heritage Benefits and Harm justified by Other Non Public Benefits**

The framework makes it clear that substantial and less than substantial harm can be outweighed by other Public Benefits. Consideration has to be given to if and when other factors mean that this planning balance does not have to be considered. It is also accepted that if it can be demonstrated that there is “no harm” then no justification is necessary.

### **13.17 Heritage Benefits**

The National Planning Policy Framework suggests that there must be “public benefit” to justify less than substantial harm to a heritage asset and that this can include *securing its optimum viable use*.

In addition the PPS 5 Practice Guide paragraph 37 lists other public (Heritage) benefits as follows:

- 1. The social value of heritage assets to the community.*
- 2. The potential for heritage-led regeneration.*
- 3. The wider public benefits of the conservation of historic landscapes, parks and gardens. For example, in providing opportunities for recreation, the preservation of natural habitats and improved environmental quality.*
- 4. The potential for heritage assets to improve quality of life and sense of place.*
- 5. Creating opportunities for the optimum viable re-use of heritage assets at risk.*
- 6. The role of traditional building materials and patterns of land use in local distinctiveness.*
- 7. How heritage assets contribute to the attractiveness of streets and public spaces and how this contribution might be enhanced by, for example, reducing street clutter.*
- 8. How to increase accessibility to and participation in the historic environment.*
- 9. The economic potential of heritage assets.*
- 10. The possible impacts of heritage tourism on the historic environment and wider community.*
- 11. Opportunities to increase housing supply or meet other priorities by re-using and adapting heritage assets.*
- 12. Ways that new development might complement and enhance existing settlements and heritage assets.*

Further relevant paragraphs of the Practice Guide state:

*78. Local authorities are advised to take into account the likely longevity of any public benefits claimed for a proposed scheme. Speculative, ill-conceived or short-term projects will not compare so favourably when considering an irreversible harm to the significance of a heritage asset.*

*79. There are a number of potential heritage benefits that could weigh in favour of a proposed scheme:*

- It sustains or enhances the significance of a heritage asset and the contribution of its setting.*
- It reduces or removes risks to a heritage asset.*
- It secures the optimum viable use of a heritage asset in support of its long term conservation.*
- It makes a positive contribution to economic vitality and sustainable communities.*

- *It is an appropriate design for its context and makes a positive contribution to the appearance, character, quality and local distinctiveness of the historic environment.*
- *It better reveals the significance of a heritage asset and therefore enhances our enjoyment of it and the sense of place.*

### **13.18 Public Benefits**

*87. Where a proposal causes minor harm there will still be a loss of value to society caused by that harm. This is a loss of public benefit that needs to be weighed against any other public benefits the proposal will bring, including, possibly, the conservation benefit of the proposal being part of realising the optimal viable use of the asset. Flexibility and imagination in the design process is crucial to minimising conflict. Some works may seem individually to be of little importance but can cumulatively be destructive of a heritage asset's significance.*

*93. Keeping land in active use is a public benefit. It will be very rare that a decision has to be made between keeping a designated heritage asset and returning the site to active use but in such cases a balance still has to be struck between the loss to society of the significance of the designated asset and the benefits of returning the site to use. Loss of the highest graded assets will only be on wholly exceptional grounds.*

In addition the English Heritage website states: <http://www.english-heritage.org.uk/professional/advice/hpg/decisionmaking/NPPF/> (10/10/2012)

*Public benefits in this sense will most likely be the fulfilment of one or more of the objectives of sustainable development as set out in the NPPF, provided the benefits will endure for the wider community and not just for private individuals or corporations. It is very important to consider if conflict between the provision of such public benefits and heritage conservation is necessary.*

*The NPPF seeks economic, social and environmental (including historic environmental) gains jointly and simultaneously. The planning system should actively guide development to sustainable solutions. Pursuing sustainable development involves seeking positive improvement in the quality of the built environment. Substantial harm or loss should be refused unless it is demonstrated that it is necessary to deliver substantial public benefits that outweigh that harm (paragraphs 8, 9 and 133). The public benefits may be achieved with less or no harm by alternative design or location.*

*Sometimes harm is necessary to enable change of use of the asset to its optimum viable use. The optimum viable use is either the sole viable use of the asset or, if there is more than one viable use, the use most consistent with its ongoing conservation. Enabling such a change of use can be a public benefit that outweighs the harm done.*