Denton Homes
June 2025

BIDWELLS

Heritage Statement

5 Spencer Street

BIDWELLS

QUALITY ASSURANCE

SITE NAME:	5 Spencer Street
CLIENT NAME:	Denton Homes
TYPE OF REPORT:	Heritage Statement
PREPARED BY:	Sarah Burdis MSc, MA, BSc (Hons)
DATE:	23.06.2025
REVIEWED BY:	Daniele Haynes IHBC, MSc, BA
DATE:	30.06.2025

SMARTER PLANNING CHAMPION

Figure 1 - St Albans

BIDWELLS

CONTENTS

1.0 Introduction 5
Background to the Report 5
Scope and Limitations of the Report 5
2.0 Site Context 7
3.0 Heritage Assets 11
4.0 Assessment of Significance 13
5.0 Significance Plan 20
6.0 Pre-Application Advice 22
7.0 Proposed Scheme 28
8.0 Impact Assessment 31
9.0 Conclusions 35
10.0 APPENDICES 37
APPENDIX A_METHODOLOGY 27
APPENDIX B_HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY 30

INTRODUCTION

1

1.0 Introduction

Background to the Report

1.1 This Heritage Statement has been prepared by Bidwells on behalf of Denton Homes to support the redevelopment of the former Argos site at 5 Spencer Street, St Albans, hereafter called 'the site'.

1.2 The site is located within the Commercial Centre Character Area of the St Albans Conservation Area, and is in proximity to a number of structures included on the Statutory List of Buildings of Special Architectural or Historic Interest, and several locally-listed buildings.

1.3 This Heritage Statement includes a Significance Assessment which identifies the relative heritage value of the identified heritage assets and an Impact Assessment which considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting. This approach to impact-assessment is required in order to satisfy the provisions of Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 207-221).

Authorship

1.4 This document has been prepared by Sarah Burdis MSc, MA, BSc (Hons), Principal Heritage Consultant and reviewed by Daniele Haynes IHBC, MSc, BA (Hons), Associate Heritage Consultant.

Methodology

1.5 Our methodology is set out in Appendix A.

Heritage legislation, policy and guidance

1.6 The legislation, policy and guidance summary is set out in Appendix B.

Scope and Limitations of the Report

1.7 The level of detail provided within this assessments is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance" as set out in Paragraph 207 of the National Planning Policy Framework.

1.8 This document is not a condition survey or a full conservation management plan and should not be used as such.

1.9 Photographs contained in this report (where no source is given) are those of the author. All maps (unless otherwise stated) are reproduced with the permission of the National Library of Scotland. Sources are provided for all other photographs and images, the copyright of which may remain with the original author. This report should therefore not be used for any purpose that may infringe the original copyright.

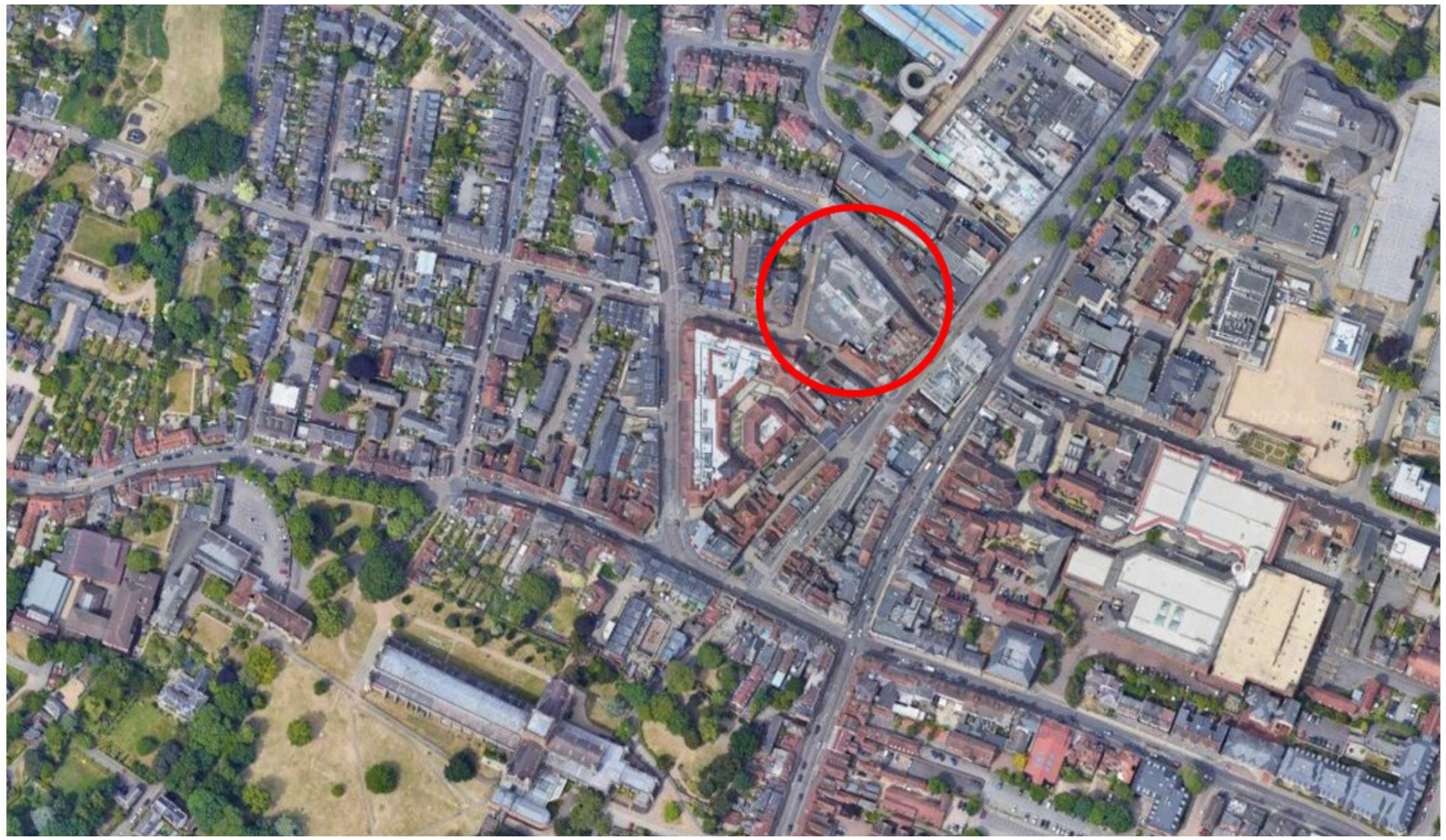

Figure 2 - Aerial showing the approximate location of the site (outlined in red).

SITE CONTEXT

2

2.0 Site Context

Historic Context

St Albans

2.1 The town of St Albans is Iron Age in origin and was first known as ‘Verlamion’. By the Roman period, the town had become ‘Verulamium’ and was the second largest town after London. The name ‘St Albans’ derives from the local St Alban who is thought to have been buried near to the present Cathedral. For much of its history, the town was a rural market town - a site of pilgrimage and a coaching stop on the route between London and the Midlands.

2.2 An initial review of available historic maps has been undertaken to assist in the understanding of the site’s history. Although such information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable - particularly the later Ordnance Survey (OS) maps - and taken together with written archival date and physical evidence can help to refine the history of a site.

2.3 The old town grew up around the north, east and west sides of the abbey precincts, extending up to the Market Place and along historic thoroughfares such as St Peter’s Street and High Street. This can be seen in the c. 1700 map of St Albans (Figure 3). The buildings fronting the main roads often had long burgage plots behind, and at the time the site formed part of the surrounding fields.

2.4 The form of St Albans remained centred around these streets and surrounded by fields until the early 19th century (Figure 4). By the time of the 1846 Tithe Map (Figure 5), the town had expanded and streets had been built in the area surrounding the site.

2.5 The 1878 Ordnance Survey map again shows the infilling of the town around the historic centre along St Peter’s Street (Figure 6). To the north of the site (outlined in red), the historic buildings along St Peter’s Street still retain their long rear burgage plots. The site would have originally contained burgage plots for the buildings along the Market Place (nos. 25-37).

Site History

2.6 Although the 1846 Tithe Map does not show the whole of the site, it indicates that by this time site and its surrounding were built up (Figure 5). The Methodist Chapel (since demolished) is shown on Upper Dagnall Street.

2.7 The 1880 Ordnance Survey map shows that at this time the site contained the Methodist Chapel and a hotel on Upper Dagnall Street, an infant school on Cross Street, and houses along the southern side of Spencer Street (Figure 7).

2.8 The 1924 Ordnance Survey map shows few changes in the footprint of the built form. It shows the buildings to the east and north of the Methodist Chapel as a single form, meaning they are connected/ in use as a single property (Figure 8).

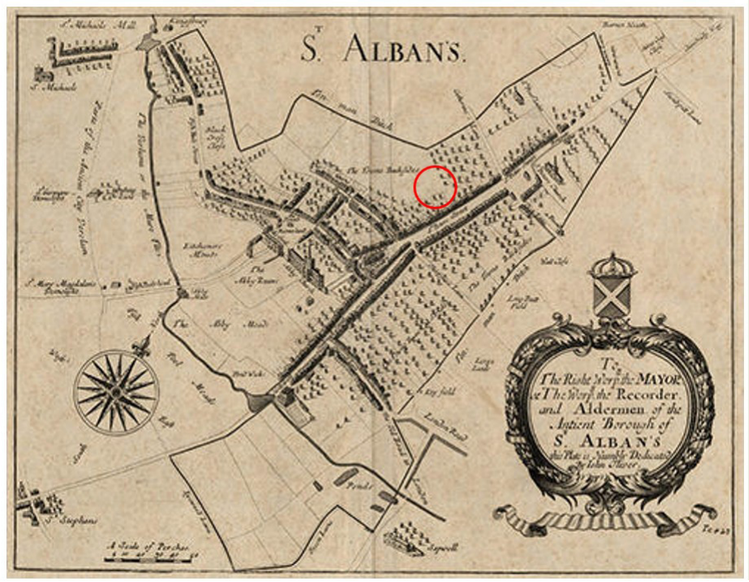

Figure 3 - c.1700 map of St Albans. The approximate location of the site is outlined in red.

Figure 4 - Extract from the Tithe Map of 1846. The approximate location of the site is outlined in red.

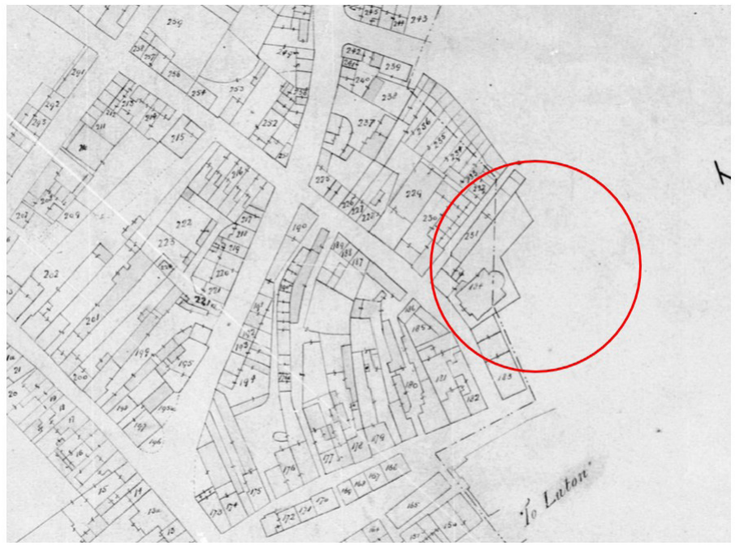

Figure 5 - Extract from the Tithe Map of 1846. The approximate location of the site is outlined in red

Figure 6 - 1878 Ordnance Survey map

2.9 An 1899 illustration of Upper Dagnall Street shows that in the late nineteenth century the Old Moot Hall and the former Methodist Chapel were under the use of the Herts Advertiser (Figure 9). This explains the large complex of joined up buildings shown in the 1924 OS map, which were likely buildings originally with a mix of uses all brought under the ownership of the Herts Advertiser.

2.10 By the 1939 Ordnance Survey map, it appears that some of the housing along Spencer Street has been demolished to make way for the Printing Works (Figure 10). The Methodist Chapel still survives as part of this complex and possibly some of the older buildings on the corner of Upper Dagnall Street and Cross Street (Figure 11).

2.11 Around 1970, the Printing Works was demolished to make way for a supermarket building, which was most recently an Argos before its permanent closure (Figure 12). In the construction of this supermarket, the Methodist Chapel was demolished along with the other historic buildings in the area bounded by Upper Dagnall Street, Cross Street and Spencer Street, excluding the buildings fronting the Market Place.

Figure 7 - 1880 Ordnance Survey map.

Figure 8 - 1924 Ordnance Survey map.

Figure 9 - 1899 illustration by F.G. Kitton of the Old Moot Hall, Upper Dagnall Street, St Albans.

Figure 11 - Former schoolroom and Methodist Chapel, Upper Dagnall Street, in use by the Herts Advertiser

Figure 10 - 1939 Ordnance Survey map

Figure 12 - Google satellite image, 2022

The Site

2.12 The site is bounded by Upper Dagnall Street to the south, Cross Street to the east, Spencer Street to the north and the rear of buildings along Market Place to the right. It was most recently in use as an Argos store.

2.13 The building which currently occupies the site is a large, solid form with few or no window openings onto the street. Its large scale and angular, uniform appearance contrast with the variety of small historic buildings in the surrounding area, however this is mitigated by the use of red brick which is commonly used in the surrounding historic buildings. The height also steps down at the corner of Cross Street and Spencer Street.

2.14 There are views of the Argos building from the Market Place. Looking up Spencer Street, the red brick form blends in to some extent with the local context but the sheer expanse of blank wall, massive square forms and angular roof profile are alien to this context. In contrast to the north side of Spencer Street, there is no animation of the ground floor (except for the short loggia section) and this presents a solid and blank elevation to the street which is very unlike the historic context.

2.15 There are views across the historic centre of St Albans from Verulamium Park. The roof of the Argos building is slightly visible to the right of the Baptist Chapel above the trees when viewed from the park. However, it is very hard to identify and blends into skyline of surrounding buildings which are of similar height.

Figure 13 - Google satellite image, 2022

Figure 14 - View of the Argos building at the site from Upper Dagnall Street, looking west

Figure 15 - View of the site from Spencer Street, looking south-east

Figure 16 - View looking towards the site from the Market Place, looking west up Spencer Street

Figure 17 - View looking towards the site from the Market Place, looking west up Upper Dagnall Street

Figure 18 - View from Verulamium Park looking towards the site

HERITAGE ASSETS

3

BIDWELLS

3.0 Heritage Assets

Identification of Assets

3.1 This section identifies heritage assets which relate to the site. In the case of this application submission, the following heritage assets are local to the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with 'Step 1' of the GPA3 The Setting of Heritage Assets.

3.2 Although there are other built heritage assets within the local surrounding area, the location and significance of many of them results in them having no perceptible relationship with the proposed development site. For this reason, only the built heritage assets which may be considered to be affected by the proposals have been identified.

3.3 In the case of this application, the following built heritage assets are located within the vicinity of the site. From an initial review, in addition to the St Albans Conservation Area the following heritage assets may be affected by the proposed development of the site:

List of Assets

1) 30 Spencer Street (Grade II)
2) 26 And 28 Spencer Street (Grade II)
3) 1 And 3 St Peter's Street (Grade II)
4) Town Hall Chambers (Grade II)
5) 27 Market Place (Grade II)
6) The Old Moot House (Grade II)
7) 2 And 4 Upper Dagnall Street (Grade II)
8) The Hertfordshire Advertiser (Grade II)
9) The King's Head (Grade II)
10) 21 And 21a Market Place (Grade II)
11) Wellington Public House (Grade II)
12) Court House, Town Hall (Grade II*)
13) Premises Occupied By Uptons Ltd (Grade II)
14) 30 And 32 Market Place (Grade II)
15) 26 Market Place (Grade II)
16) Commercial Centre Conservation Area
17) Locally Listed Buildings.

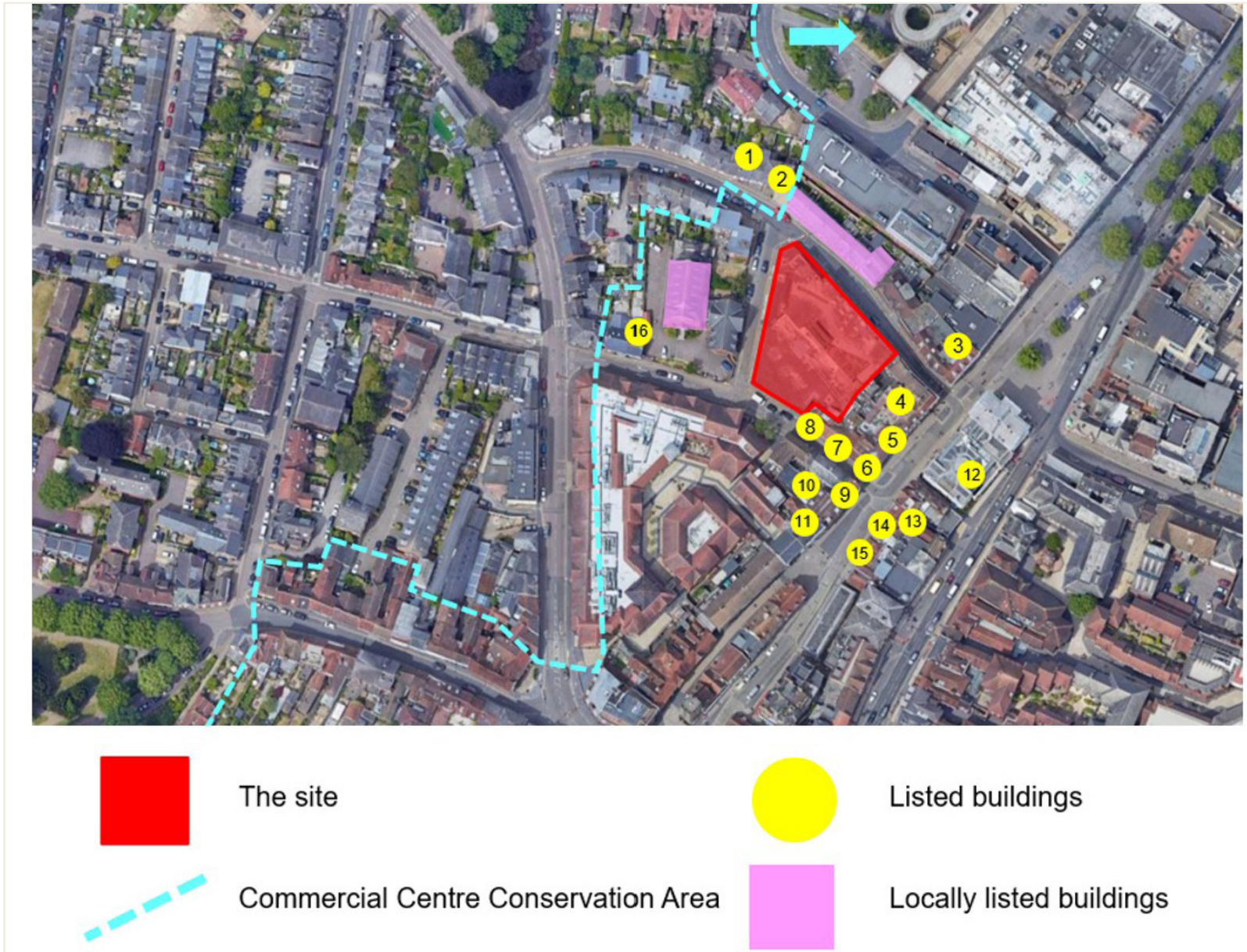

Figure 19 - Heritage Assets Map

3.4 For the purposes of this assessment, where we consider the Conservation Area, we are considering the Conservation Area as a term of designation but also with reference to the built assets which they contain; in other words, we do not assess the Conservation Area in two dimensions but rather as a grouping of buildings and spaces and the manner in which these relate to their surroundings. Thus, consideration of effects on the setting of a Conservation Area also takes into account potential effects on the setting of built assets within that designated area, this includes the buildings which are considered to make a positive contribution to the Conservation Area.

3.5 Any buildings or structures considered to fall within the curtilage of the above listed buildings would be considered to form part of the listed building and impacts would be assessed accordingly

ASSESSMENT OF SIGNIFICANCE

4

BIDWELLS

4.0 Assessment of Significance

Significance Assessment Methodology

4.1 The below evaluation of significance and subsequent conclusions have been assessed in line with the methodology outlined in Appendix A and consider the following:

- The relevant planning legislation as well as the policies set out in the National Planning Policy Framework (NPPF) and objectives of the Planning Practice Guidance;
- Historic England 'Conservation Principles: Policies and Guidance';
- British Standard 7913 (2013) Guide to the 'Conservation of Historic Buildings';
- Guidance set out in Historic England advice notes.

Significance Assessment

St Albans Conservation Area - Commercial Centre Character Area

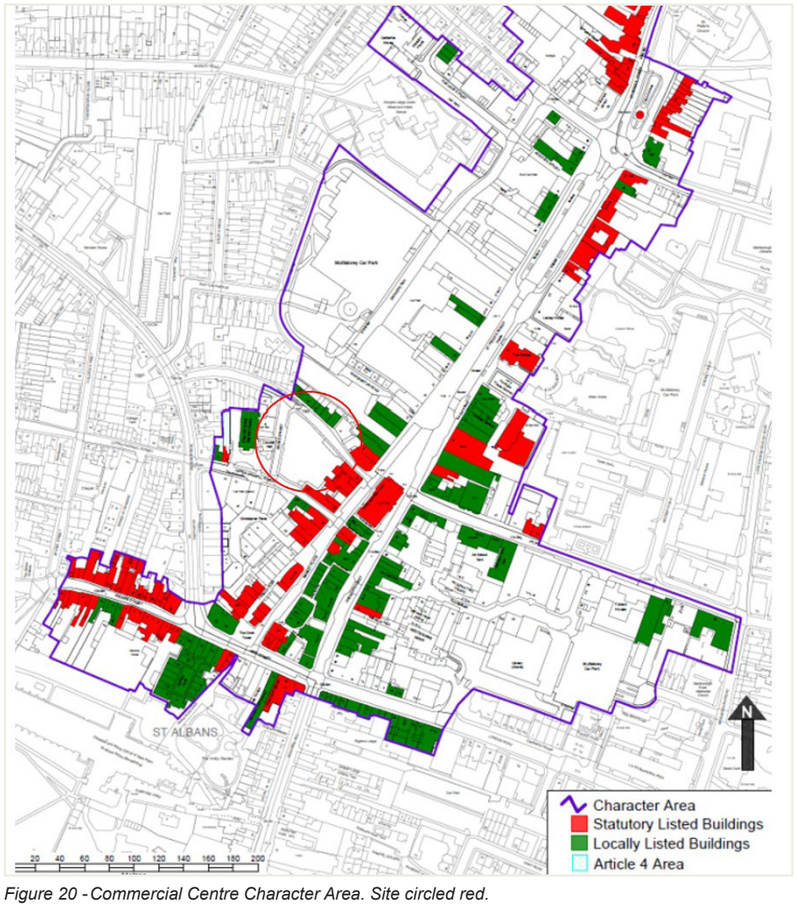

Figure 20 - Commercial Centre Character Area. Site circled red.

4.2 The Commercial Centre Character Area lies at the heart of the original town and contains many historic and cultural layers, including an early medieval market town layout. The Area contains many listed buildings, mostly clustered around the medieval market place.

4.3 A significant number of medieval buildings survive including those built as inns to serve the pilgrim trade. There are also significant numbers of post medieval timber framed and brick buildings and brick buildings from the Georgian period. There are some high quality Victorian/Edwardian buildings which represent the area's growth as the shopping and banking centre for the wider city that grew up during the railway era. Later 20th century development within the Commercial Centre is generally mediocre or poor.

4.4 The medieval market place is reputed to have been originally a much larger open space, which became built up with permanent buildings which replaced market space. This consolidated the organic cross grain pattern of streets and alleys still seen today. The Clock Tower in the Market Place was built between 1403 and 1412 and was intended as a visible statement of St Albans' civic ambitions. In the medieval period, the pilgrim trade brought many people to St Albans (and the Abbey).

4.5 Following the Dissolution, the town continued to be of importance as a stop-over for travellers between London and the North West. This led to gradual further development of inn yards back from their confined narrow frontages, thus retaining the medieval street pattern. Georgian development in the town mostly comprised of new brick frontages to earlier buildings. New Georgian development however is represented in the impressive Town Hall which would have formalised St Peter's Street into a wide avenue of Georgian character, disguising the medieval layout behind.

4.6 During the Victorian/Edwardian era, the wider city expanded into suburban residential suburbs, while the area surrounding the medieval market place remained the centre. Many of the long burgage plots behind the older buildings were built upon, and the field character surrounding the medieval centre was lost. Shopping and banking flourished and some Victorian shopfronts and bank buildings remain. Many buildings in the centre were rebuilt or re-fronted.

4.7 In the 20th century extensive, more commercially-focussed, redevelopment took place. During the inter-war years the shopping centre developed further north in St Peter's Street, and further retail premises replaced large historic houses. Printing had become a major local industry and a larger printing works was created between Upper Dagnall Street and Spencer Street (the site). On the west side of St Peter's Street, the process of plot amalgamation and building replacement to create larger and more modern stores continued in the 1960s and 1970s.

4.8 In views from Verulamium Park, the Commercial Centre is predominantly a mixture of relatively small scale pitched roofs with chimney stacks, at a relatively low level. However, in long views the multi storey car parks on Drovers Way are unfortunately predominantly visible, along with other positive prominent skyline buildings such as the Town Hall and the Baptist Church.

4.9 The Commercial Centre retains a strong sense of character and the surviving buildings represent the many phases of growth and change in St Albans. The pattern of the medieval market place and surrounding tiny criss-crossing alleys is still present. The Area is unified in character by its commercial city centre feels, and streets vary in appearance depending on their historic origins and pattern and degree of redevelopment and change.

4.10 The Commercial Centre Character Area is considered to hold a good level of significance overall.

Contribution of site to character and appearance

4.11 The site formerly contained a variety of Victorian buildings including the red brick Methodist Chapel. This group of buildings with a variety of uses would have been typical of the character of the area. Following demolition of all historic buildings on the site, the Argos building was constructed around 1970. As with several late 20th century additions to the Commercial Centre, it does not contribute to the historic value of the Conservation Area. It is of an unremarkable design and its large presence makes this area of the Conservation Area less significant. It is considered to make a minor adverse contribution to the character and appearance of the Conservation Area mainly resulting from its blank and inactive facades and general character.

30 Spencer Street; 26 and 28 Spencer Street – Grade II

Figure 21 - 30 Spencer Street

Figure 22 - 26 and 28 Spencer Street (right)

4.12 30 Spencer Street was first added to the Statutory List of Buildings of Special Architectural or Historic Interest in August 1971. 26 and 28 Spencer Street were also listed as a pair at this time. Nos 26 and 28 are a symmetrical pair of houses, and form an end of a terrace with no. 30 on their left.

4.13 The buildings date to the early 19th century and are built of red brick with diapering of blue headers. They have low pitched slate roofs and brick chimneys. The windows are sashes, and no. 30 has a curved shop front window at the ground floor. Each house has a fanlight door although the fanlight to no.30 is blocked in.

4.14 The assets are considered to hold a good level of significance.

Setting

4.15 These assets are part of a wider group along Spencer Street which contains many locally listed buildings, and together they have group value. This northern side of Spencer Street is attractive in appearance and represents the 19th century expansion of St Albans. However, much of the historic character of the southern side of Spencer Street has been lost due to the dominance of the Argos building. There are views from the assets down Cross Street, which contains many unremarkable modern red brick buildings. The setting is therefore considered to make a low beneficial contribution to the significance of the assets.

Contribution of the site

4.16 The Argos building currently present on the site detracts from the historic character of the area and is very large in scale compared to the modest residential buildings along the northern side of Spencer Street. Its presence is somewhat mitigated by the use of red brick and stepping down in height at the corner of Cross Street and Spencer Street, although its design has nothing in common with the local context.

4.17 The site in its present condition is considered to have a minor adverse impact on the setting of the assets.

1 and 3 St Peter's Street – Grade II

Figure 23 - 1 and 3 St Peter's Street

4.18 1 and 3 St Peter's Street was first added to the Statutory List of Buildings of Special Architectural or Historic Interest in May 1950, and the listing was most recently amended in April 1977.

4.19 The building has a late 17th century façade and is 2 storeys high with an attic. It is built of brown brick with red and blue brick dressings, and has a high pitched tiled roof. The windows are sashes with thick glazing bars in flush box frames. The house originates to the early 17th century and has gone through many alterations up to the present day. Inside there are several older features including massive tie beams and a close studded timber frame in one room. The building was originally listed at Grade II*, but was demoted because of the 'exterior spoiled by modern shop fronts'.

4.20 The asset is considered to hold a good level of significance.

Setting

4.21 1 and 3 St Peter's Street looks out onto the open public space at the front of the Town Hall. It is located within the medieval centre of St Albans and the historic civic surroundings make a good beneficial contribution to its significance.

Contribution of the site

4.22 Nos 1-3 are located on the corner of St Peter's Street and Spencer Street, approximately 50 metres to the east of the site. As the primary façade of the asset looks towards the Market Place, the buildings along Spencer Street are a less significant part of its setting. While the site in its current form does not correspond with the historic character of the area, its scale and use of red brick means it blends in some limited way into its surroundings – although the blocky and unrelieved design is not compatible with the context. Therefore, the site is considered to make a negligible/minor adverse contribution to the setting of the asset.

Town Hall Chambers – Grade II

Figure 24 - Town Hall Chambers viewed from the Market Place

Figure 25 - Rear of Town Hall Chambers viewed from the site

4.23 Town Hall Chambers was first added to the Statutory List of Buildings of Special Architectural or Historic Interest in May 1950. It is located on Market Place.

4.24 It was originally a single house dating to the early 18th century, and now features modern shop fronts on the ground floor. It is built of blue and red brick, part panelled and part diapered, and has a brick parapet. There is a high-pitched, tiled roof, and the windows are sash with gauged, flat red brick arches. The entrance to no. 35 has a doorcase with an open pediment with a modillioned and dentil cornice and has a Doric order.

4.25 At the rear of the building, it has a double-pitched roof with blue brick diamond diapering, and sash windows in the attic gable and at the first floor.

4.26 The asset is considered to hold a good level of significance overall.

Setting

4.27 Town Hall Chambers is also situated adjacent to the historic market place, opposite the Town Hall. Its historic association with the Town Hall and general setting within the historic centre of St Albans make a positive contribution to its significance. The sash windows at the rear of the building would have once originally looked out over a generous rear plot, which has since been infilled, first in the Victorian period and, more recently, with the unremarkable 20th century structures on the site,

4.28 Overall, the setting of the asset is considered to make a moderate beneficial contribution to its significance.

Contribution of the site

4.29 The site backs on to the asset and is prominently visible as it is immediately outside the large sash windows. Originally, these windows would have looked out onto a large rear plot and towards the countryside, hence their generous size. This view would have been compromised since the infill of the site in the 19th century, however the original buildings were probably not as close or as solid in form as the current Argos building.

4.30 This pattern of later infill is typical of the area, and most historic buildings such as Town Hall Chambers have had their former open rear plots filled in. However more of an impact is felt here than is typical, due to the large rear windows, and the high level of preservation of the historic features of the rear of the building.

4.31 Therefore, the site in its current form is considered to make a medium adverse contribution to the setting of the asset due to the poor relationship with the listed building's rear elevation.

27 Market Place and the Old Moot House – Grade II

Figure 26 - 27 Market Place (right, currently a Le Creuset shop) and the Old Moot House

4.32 27 Market Place and the Old Moot House were both first listed in August 1971. 27 Market Place was originally part of the Moot House, a large 15th century building which has since been divided up into several addresses.

4.33 The Old Moot House was the original town hall. Meeting rooms were located on the first floor and the ground floor contained small cells and accommodation for the jailer. It is a timber framed building whose external appearance has been much altered in the 18th century. The roof is high pitched, hipped and tiled, with a moulded wood eaves cornice. There are 20th century shop fronts on the ground floor facing the Market Place. Inside there are a large number of heavy posts and beams.

4.34 The asset is considered to hold a good level of significance overall.

Setting

4.35 As the former town hall, its location in the medieval centre is important to the understanding of its original function. Furthermore, it is surrounded by other listed and locally listed historic buildings. Therefore, the setting is considered to make a good beneficial contribution to the significance of the asset.

Contribution of the site

4.36 The site is located to the north-west of the asset. It is adjacent to the western section of the Moot House building with frontages to Upper Dagnall Street, which is assessed in the section below. The section of the Moot Building discussed here has a frontage to the Market Place, so the Argos building is not a part of its immediate setting. Although the site does not contribute to the historic character of the area, its impact is mitigated by the use of red brick and its low height. There are possibly some views of the site from rear windows of the assets but there are no full views as in the case of Town Hall Chambers.

4.37 Therefore, the site in its current form is considered to make a minor adverse contribution to the setting of the asset.

The Hertfordshire Advertiser and 2 and 4 Upper Dagnall Street – Grade II

Figure 27 - The Hertfordshire Advertiser (left) and 2 and 4 Upper Dagnall Street (right)

4.38 The Hertfordshire Advertiser (now Albany Denture Centre) and 2 and 4 Upper Dagnall Street were first listed in August 1971.

4.39 They are part of the original 15th century Moot Hall building and comprise the western part of the building with a frontage to Upper Dagnall Steet. The ground floor features early 20th century shop fronts.

4.40 The assets are considered to hold a good level of significance overall.

Setting

4.41 Upper Dagnall Street is a historic street still retaining a good level of historic character towards the Market Place end where the assets are located. Modern red brick buildings at the western end of the street detract from the wider historic character, but are predominantly built of red brick which lessens their impact. Overall, the setting is considered to make a medium beneficial contribution to the significance of the assets.

Contribution of the site

4.42 The Argos building is located immediately adjacent to the assets,

bordering their west and northern boundaries. The solid red brick massing of the building is a sudden contrast to the timber-framed jettied Moot House. However, the height of the Argos building is appropriate to the scale of the historic buildings. The site is also only an element of the wider surroundings which still hold a historic civic character.

4.43 Therefore, the site is considered to make a low/medium adverse contribution to the setting of the assets.

The Kings Head, 21 and 21a Market Place, and Wellington Public House – Grade II

Figure 28 - The Kings Head (left), 21 and 21a Market Place (centre), and Wellington Public House (right)

4.44 The Kings Head and 21 and 21a Market Place were first added to the Statutory List of Buildings of Special Architectural or Historic Interest in September 1970, and Wellington Public House was listed in 1971. They form a row of three at the Market Place.

4.45 The Kings Head (far right of the row) dates to the early 18th century It is of painted brick and has two storeys and an attic, with a painted brick parapet and a tiled mansard roof. The ground floor has an early 19th century public house front, and its rounded angle returns onto Upper Dagnall Street.

4.46 21 and 21a Market Place dates to the late 17th or early 18th century and was originally a house of 2 storeys and an attic. It was re-fronted in the early 19th century in yellow stock brick, and has a modern shop front on the ground floor. It features a deep, original moulded wooden eaves cornice with modillions.

4.47 The Wellington Public House dates to the early 19th century and is a 3 storey grey brick building with grey dressings. It features 6/6 sash windows. The ground floor has modern shop fronts.

4.48 The assets are considered to hold a good level of value overall.

Setting

4.49 The assets front onto the Market Place, and their location in the civic centre of St Albans is important to their significance. Many public houses and inns are found in this area due to its importance as a route from London to the north west. The 20th century Christopher Place shopping centre is located to the west of the assets, which while not historic is appropriate in use of materials and scale to the surrounding historic buildings.

4.50 Therefore, the setting is considered to make a good beneficial contribution to the significance of the assets overall.

Contribution of the site

4.51 The site is located approximately 100 metres to the north of the assets. Due to intervening built form, there is no direct relationship between the site and the assets. Overall, the site is considered to make a negligible adverse contribution to the setting of the assets.

Court House (Town Hall) – Grade II*

Figure 29 - Court House (Town Hall)

4.52 The Court House (Town Hall) was first added to the Statutory List of Buildings of Special Architectural or Historic Interest in May 1950 and is graded II*.

4.53 It is a classic building of 1826 by George Smith. The front façade faces north up St Peter's Street and its grand scale is imposing in comparison to the surrounding smaller market town buildings. It has 2 storeys, the upper being a piano nobile with a central portico of four fluted, Ionic columns, an entablature and pediment. It is now home to the St Albans Museum and Art Gallery.

4.54 The asset is considered to hold a good/high level of significance overall.

Setting

4.55 The Court House is located in the historic centre of St Albans. It is a landmark building and holds historical importance as the former Town Hall, and continues to be of importance to the public as the city's museum and art gallery. Therefore, its setting in such a prominent location is considered to make a good beneficial contribution to its significance.

Contribution of the site

4.56 The junction of Spencer Street and the Market Place is adjacent to the north-western elevation of the Town Hall. Therefore, there are some views from the Town Hall along Spencer Street towards the site. However, only glimpses of the site are visible due to intervening built form, and there is no direct relationship perceived. As a result, the site in its current form is considered to make a neutral contribution to the setting of the asset.

Premises Occupied by Uptons Ltd – Grade II

Figure 30 - Premises occupied by Uptons Ltd

4.57 The Premises Occupied by Uptons Ltd were first added to the Statutory List of Buildings of Special Architectural or Historic Interest August 1971.

4.58 The building is located on Sovereign Alley off the Market Place. It is a small timber-framed house to the rear of nos 30 and 32 Market Place,

dating to the 17th century.

4.59 The asset is considered to hold a good level of significance overall.

Setting

4.60 The asset is located down Sovereign Alley, one of many alleys resulting from the evolution of the market from temporary stalls to permanent buildings. The alley is very enclosed and secluded in contrast to the busy open market place. The setting is considered to make a good beneficial contribution to the significance of the asset.

Contribution of the site

4.61 As the asset is tucked down the enclosed alley, there is no relationship between the site and the asset Therefore the site in its current form makes a neutral contribution to the setting.

30 and 32 Market Place, and 26 Market Place – Grade II

Figure 31 - Premises occupied by Uptons Ltd 30 and 32 Market Place (left) and 26 Market Place (right)

4.62 30 and 32 Market Place, and 26 Market Place, were first added to the Statutory List of Buildings of Special Architectural or Historic Interest in August 1971.

4.63 30 and 32 Market Place dates to the 17th century and has 2 storeys and an attic. It was originally a house and now has a 19th or 20th century ground floor shop front. The first floor has a plastered façade and four mullioned and transomed windows with modern glazing. 26 Market Place is a 17th century building with an early 18th century façade. It is of red brick with a painted front façade and it has a 19th century shop front on the ground floor.

4.64 The assets are considered to hold a good level of significance overall.

Setting

4.65 The assets are located on the south-eastern side of the Market Place. The setting is considered to make a good beneficial contribution to the significance of the assets.

Contribution of the site

4.66 The site is located approximately 100 metres to the north-west of the assets. Due to intervening built form, there are no views of the site from the assets. The site is considered to make a neutral contribution to the setting of the assets.

Locally listed buildings

4.67 The map below highlights locally listed buildings in blue. From an initial review, the following non designated assets may be affected by the proposed development of the site:

- 32-62 and 33-51 Spencer Street
- 8-24 Spencer Street
- Dagnall Street Baptist Church
- The White Swan Public House

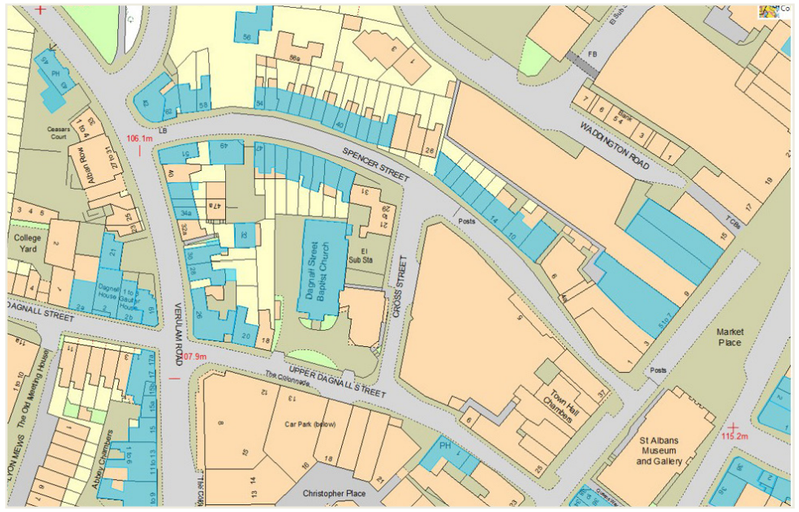

Figure 32 - Map highlighting locally listed buildings in blue

32 – 62 and 33-51 Spencer Street

4.68 These groups of locally listed buildings are located on either side of Spencer Street, at the western end of the street towards Verulam Road. They are a group of modest Victorian residential properties which are typical of the 19th century suburban expansion of St Albans. They are two stories in height with basements, and small flights of stairs leading up to the front doors due to the sloping nature of the street. They are built of red brick with slate roofs and feature sash windows.

4.69 These two groups of locally listed buildings retain a strong sense of character but are unremarkable in design and appearance. They are considered to hold a low level of significance overall.

Setting

4.70 Spencer Street is part of the suburban expansion of St Albans during the Victorian period, and its setting both close to the medieval Market Place and the surrounding suburbs are important to the understanding of this. Overall, the setting is considered to make a good beneficial contribution to the significance of the assets.

Contribution of the site

4.71 The site is located on Spencer Street, at the south eastern end. The junction of Cross Street with Spencer Street experientially separates the western and eastern end of Spencer Street, thereby separated the site from the locally listed group. While the site is visible in some views, it is not a primary part of the setting, and in terms of scale and building materials it fits in with the overall area character, the site is considered to make a nil contribution to the setting of the assets.

8-24 Spencer Street

4.72 This group of buildings along Spencer Street are located to the eastern end of Spencer Street. They also date to the 19th century and are similar in character, with slate roofs, sash windows, and are built of red and blue brick. Many of the ground floor buildings also feature bay windows which could have originally been for shop displays. They are considered to hold a low level of significance overall.

Setting

4.73 The wider setting of the group is the medieval centre of St Albans and the Victorian suburbs.

Contribution of the site

4.74 Directly opposite the group is the Argos building. The extensive and blank brick walls detract from the residential character of the street, but the red

brick is in keeping with the materials of the surrounding buildings. Overall, the site is considered to make a medium adverse contribution to the setting of the assets.

Dagnall Street Baptist Church

Figure 33 - Dagnall Street Baptist Church

4.75 The Dagnall Street Baptist Church was built in 1885. It is in the Gothic Revival style and is built of red brick, with stone dressings and slate roofs. It is considered to hold a low/medium level of significance overall.

Setting

4.76 The church is located between Upper Dagnall Street and Spencer Street, within the context of the 19th century suburban growth of St Albans. The use of red brick and slate is also typical of building during this period. To the east of the church is the Cross Street Centre, which opened in 1989 and references the Gothic Revival style of the original church. Opposite the church is the Christopher Place shopping centre which was also designed with red brick and gable roof detailing in order to lessen its impact upon the historic surroundings.

4.77 The church is located in a historic area of St Albans, but much of the historic buildings in its immediate surrounding have been lost and replaced by 20th century development. The setting is considered to make a moderate beneficial contribution to its significance overall.

Contribution of site

4.78 The site is located to the east of the church. It is partially hidden from view by the Cross Street Centre but there are still views in which they both feature. The blank, angular and almost hostile appearance of the existing building of the site is at odds with the delicate vertical proportions of the church and there is a strong contrast between the two sites.

4.79 The existing buildings on the site have a medium adverse impact on the setting of the Baptist Church.

The White Swan Public House

Figure 34 - The White Swan Public House

4.80 The current White Swan building first appears on the 1880 Ordnance Survey map, although parts of the building may be older. It is two storeys with a white render and features sash windows. It is considered to be of low significance overall.

Setting

4.81 The pub is on Upper Dagnall Street located opposite the Old Moot Hall, the former medieval town hall of St Albans. It is located within the Commercial Centre Conservation Area and is close to many listed buildings but is also adjacent to the 20th century Christopher Place. Overall, the setting is considered to make a medium beneficial contribution to the significance of the asset.

Contribution of the site

4.82 The site is located directly to the north-west of the asset and is visible from the pub. Its blank and angular appearance provides very little animation of the street and it feels anonymous in the streetscene. The site in its current form therefore makes a medium adverse contribution to the setting of the asset.

SIGNIFICANCE PLAN

5

BIDWELLS

5.0 Significance Plan - 5 Spencer Street, St Albans

Figure 35 - Significance Plan, extract from St Albans Planning Application Search

Relevant Planning History

5.1 The significance of built form directly abutting the application site was determined following a review and assessment of relevant and available planning history. The rear of properties along the Market Place have been subject to incremental alteration, change and extension since initial construction which is understood to have diminished any inherent interest and therefore significance here. These extensions were understood to have been carried out to facilitate the better practical functioning of the historic units for previous users, and were predominantly carried out throughout the 20th and 21st centuries with limited to no architectural reference to their historic counterparts. Applications of relevance therefore include:

1) 5/1994/1746 - New shop, new signs and external and internal alterations and single storey rear extension;
2) 5/1986/0896 - Erection of two storey rear extension, formation of new doorway and blocking up of existing window openings. Consented 17/11/1986;
3) 5/1994/1767 - New shop front and single storey rear extension. Consented 18/01/1995;
4) 5/1994/0134 - Partial demolition of rear extension, internal and external alterations. Consented 28/03/1994;
5) 5/1994/0136 - Partial demolition of rear extension, internal and external alterations. Consented 28/03/1994;
6) 5/1994/0135 - Rear canopy, external alterations and new chimney. Consented 28/03/1994; and
7) Existing built form extends from the application site, into the adjoining building. Internal relationship between this and the designated

Note - For the purposes of this significance assessment, planning history is limited to information available on St Albans City and District Council planning application search. The list above is not exhaustive.

PRE-APPLICATION ADVICE

6

6.0 Pre-Application Advice

Pre-Application 1

6.1 Pre-application advice was sought for the demolition of the existing buildings on the site and their replacement with a 60 unit Extra Care community facility in 2022 (ref: PRE/2022/0072). The proposed buildings were a maximum five storeys in height, but with the massing moderated across the site according to the topography.

6.2 The building was proposed to front onto Spencer Street and Cross Street, with a frontage, entrance and the garden courtyard accessed from Upper Dagnall Street. A basement parking area would be formed on the north-eastern side of the site, based around the existing basement level.

Pre-Application 1 Comments

6.3 The pre-application feedback stated that 'there is not an in principle objection to the demolition of the building, provided its replacement is acceptable and there is scope to have a beneficial impact upon the Conservation Area.' It is noted that the existing building at the site is not considered to contribute to the significance of the Conservation Area, but also that the Conservation Area Character Statement describes the building as quite sympathetic having been built in red brick with 'variation in the plane of the façade'.

6.4 In response to the initial proposed scheme, the feedback states that:

- *'The proposed increase in height to 5 storeys would be impactful predominantly when viewing the building from the east. The increase in scale and mass would likely increase the prominence of the building and its likely impact on the conservation area, and adjacent listed and locally listed buildings;*
- *There is a risk, due to the mass, scale and approach, that the building would be a particularly dominant addition when viewed from Spencer Street and Upper Dagnall Street facing east;*
- *The corners to Cross Street, to both Upper Dagnall Street and Spencer Street, should not be emphasised;*
- *The design should help to transition between the commercial centre to the cathedral quarter in a relatively deferential manner;*
- *The staggered roof forms of Spencer Street is an attractive feature which should be replicated;*
- *The proposed approach to site levels could be amended to better respond to the varied site level, thereby visually reducing the mass;*
- *The proposed courtyard area would result in the setting back the building in an area where this is very uncharacteristic;*
- *Materials, features, fenestration etc. should respond to the sites context;*
- *It is considered that resolved concerns over scale and mass would ensure the replacement building 'can be integrated into the existing roofscape of the town, and to avoid distraction from principal or landmark assets' and reflecting 'the granular pattern of the context, using materials that reflect local identity'.*

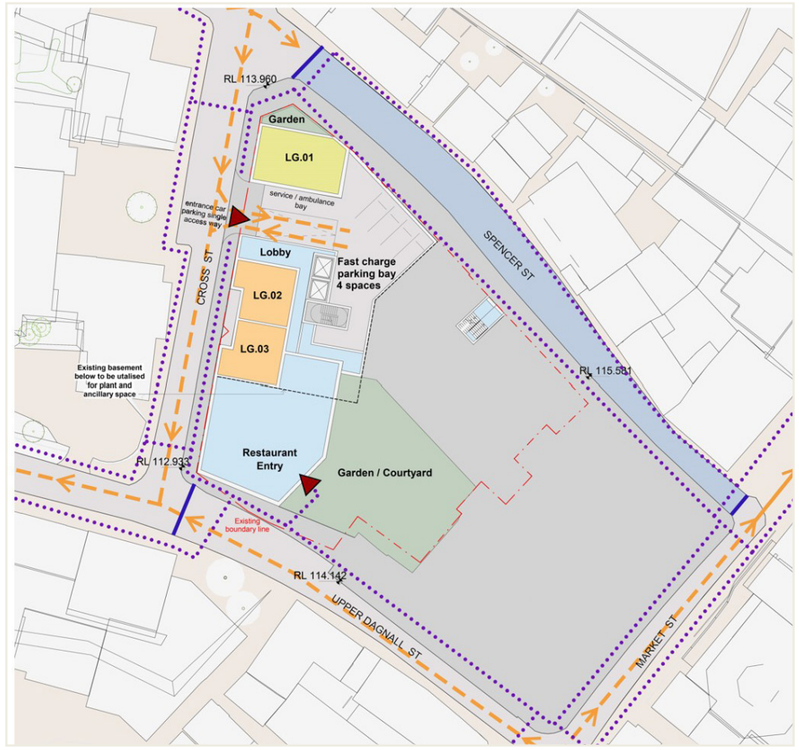

Figure 36 - Proposed lower ground floor

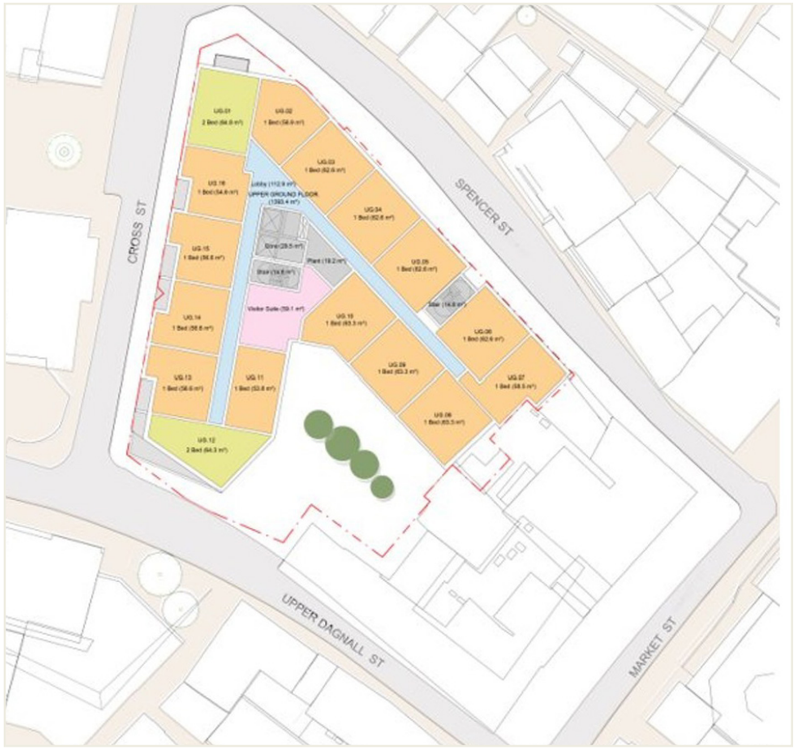

Figure 37 - Proposed upper ground floor plan

Figure 38 - Views from Upper Dagnall Street: existing (left) and initial proposals (right).

6.5 Regarding 'long range views', concern is also raised over the impact on the view from Verulamium. It is also noted that the site may be visible in the other identified long range view under policy 111.

Pre-Application 2

6.6 Following this initial pre-application feedback, a revised scheme was submitted for pre-application advice in 2023 (ref: PRE/2023/0044). It responded to comments received as part of the initial pre-application response and comprised a 4-5 storey building. It exhibited a varied roof height which sought to reduce the massing and visual impact of the scheme. Such a design feature also sought to respond to the varied site level and staggered roof forms found across the surrounding buildings. For example, the corner of Spencer Street and Cross Street addressed the street with a chamfered corner, and the mansard roof reduced the impact of the building in views down surrounding streets.

6.7 The courtyard was repositioned to the rear of the site, allowing the continuation of the building line along Upper Dagnall Street. The positioning of the courtyard at the west of the site also reduced the massing at this point, in turn facilitating a transition between the commercial centre and the residential areas to the west. As part of this pre-application submission there was an option for the introduction of a cinema unit at lower ground floor level, with an entrance on the corner of the building at ground level.

6.8 Materials were chosen to respond to the character of the area, utilising red brick which is used for the current building and many of the surrounding buildings. Slate/grey roofs were also proposed which directly reflects the materiality of the church to the west and houses along Spencer Street.

6.9 A contemporary approach to fenestration was also included in order to achieve a clear and appropriate legibility of phasing through the implementation of traditional bay windows finished in a contemporary aesthetic.

Figure 39 - Pre-app 2 view along Spencer Street

Pre-Application Comments

6.10 The pre-application feedback in relation to this revised scheme (ref: PRE/2023/0044) states that 'in principle, the redevelopment of the site remains acceptable in principle. The following sections of this advice therefore focus in more detail on several aspects of the current scheme'. It is noted that the existing building at the site is not considered to contribute to the significance of the Conservation Area, but also that the Conservation Area Character Statement describes the building as quite sympathetic (for a building of its type – a former supermarket), having been built in red multi brick with 'variation in the plane of the façade and a recessed shopfront'.

6.11 Additionally, it is noted that the application site is located further south of the commercial centre of the city and 'forms part of the transition out of the commercial centre of the city…where it is predominately residential in use and scale'. As a consequence, it is commented that 'the sensitivity and significance of this part of the conservation area is high and the development will have an impact on this'.

6.12 In response to the revised scheme, summarised the feedback states that:

- *'The increase in scale and mass, compared to what is existing on site, 'would likely increase the prominence of the building and its likely impact on the conservation area, and adjacent listed and locally listed buildings'. As a consequence, the proposed scheme is considered 'too big' and could form a 'domineering addition to the streetscene which would be inappropriate for this location';*
- *It is considered that the proposed height and mass of the building would cause harm to the significance of the Conservation Area, 26-28 Spencer Street and potentially the other affected heritage assets, including the city skyline;*
- *The built form does not appear to have a successful relationship with the site context, the underlying landscape and surrounding townscape. The building does not stagger down the hill, or form a series of terraces which work with the landscape and this increases the perceivable mass of the building*
- *The mass and form of the proposed development should better integrate itself with the site's context including the landscape and townscape. The scheme needs to work with the slope and level changes to help create a staggered form, to break up the mass of the building rather than flattening the site with retaining walls and a block which cuts through the levels and has little connection to its surroundings;*
- *The proposed sunken gardens/balconies are not particularly appropriate in this part of the Conservation Area. It emphasises that the building is detached from its context. As with the previous pre-app response it is recommended that the staggered massing of Christopher's Place is used as a guide on how to better negotiate the sloped site and surrounding massing;*
- *There is also concern that the mansard/crown roof form is not appropriate at this scale on a site where it is exposed on at least 3 sides. The roof form does not really help reduce the mass of the building given its limited angle, two-storey height, exposed nature and the large projecting dormers. It is recommended that this should be revised, taking into account how to stagger the mass of the building to suit the landscape;*
- *Additionally, it is considered that double storey dormer windows are not appropriate in this location. Whilst the quality of the precedent image is noted, the precedent image is taken from a scheme which has different larger proportions to this scheme, the individual building and its context. The design of the building needs to respond sympathetically to the site's context which is primarily diminutive and domestic in scale;*
- *Some of the design details, such as the decorative brickwork and material analysis demonstrate that some of the surrounding townscape qualities have been assessed and are proposed to be included within the design of the proposed building. These approaches are welcomed. However, it is important that the contextualisation of the design is not tokenistic and that responding to the local distinctiveness of the area is an integral part of the design of the building, rather than a facade treatment;*
- *There is no in principle objection to using bay windows, which are features in several of the nearby windows, however ensuring that these interact and connect to the public realm would be important to make them a successful feature. Overall, the transitions between the public and private realms will be important for a successful scheme and future designs should carefully consider this'.*

6.13 Long range views

- *'The impact on the long-range view from Verulamium raises concerns over the mass, scale of the proposed development as well as its blocky outline and relate to the concerns raised above.*
- *In addition to the long-range view from Verulamium Park, given the site's location, the site may also be visible in the other identified long-range view identified under policy 111. Given the views westward from the site it is likely that viewpoints from the west may be affected. Taking other viewpoints into consideration at an early stage, even if it is to demonstrate that these views would not be affected, would be beneficial'.*

Figure 40 - Pre-app 2 view along Spencer Street

6.14 It is summarised within this document that it is 'not likely to obtain permission unless substantial changes are made', with a number of recommendations to improve the proposals including:

- Attend a design review panel
- Undertaking/reviewing the design of the scheme so as to overcome the concerns raised above particularly in relation to design/heritage.
- Avoiding and/or appropriately justifying the loss of retail frontage. Appropriately justifying the cinema provision
- Providing more detail as to the impacts of the proposed development on the amenities of future and neighbouring occupiers.

6.15 Finally, it is of relevance to note that this most recent pre-application advice highlights that 'there is no in principle objection to the demolition of the building, provided its replacement is acceptable and there is scope to have a beneficial impact on the Conservation Area'. As a consequence, the scheme has been revised to address the above comments, where possible.

Pre-Application 3

6.16 A further scheme was then drawn up, seeking to once again respond to officer comments wherever possible, again in 2023 (ref: PRE/2023/0127). Therefore, and with regards to height and mass this iteration reconfigured the roofscape, creating a tiered composition with such a design approach seeking to reduce perceptions of a mass of built form, particularly in views along Spencer Street from the junction at Cross Street.

6.17 The scheme also responded to officer comments with the massing of proposed built form being reduced in northwards views to Cross Street from Spencer Street through the implementation of a reduced ridge height, interspersed with dormer windows. This also allowed for a residential character to prevail along this aspect of Spencer Street.

6.18 Along Dagnall Street the proposed roofscape was revised to reflect forms found at the neighbouring Hertfordshire Advertiser (Grade II) and adjoining 2 & 4 Upper Dagnall Street. Although higher than the existing building, the ridge height proposed as part of this scheme directly reflected the height established at the designated heritage asset, creating a logical continuation of built form here.

6.19 Further, the proposed building line was set back beyond the designated heritage asset again reducing perceptions of a mass of built form within the immediate setting of this asset, with a physical separation here both preserving and better revealing the historic fabric of the heritage asset.

6.20 As part of this scheme, commercial units were proposed – located across ground floor areas to the south and east of the site, off Spencer Street and south west off Upper Dagnall Street and at basement level to the north. To the south east, the location of commercial space adjoined existing units which front Market Place and extended along Spencer Street, seeking to represent the logical continuation of existing uses.

6.21 A series of terraces which staggered down the hill were also designed along Spencer Street allowing for a tiered roof form along the length of this route. A referential roofscape was also proposed along Cross Street and Upper Dagnall Street whereby the proposed ridge heights, roof pitches and resultant style reflected the local context of these streets.

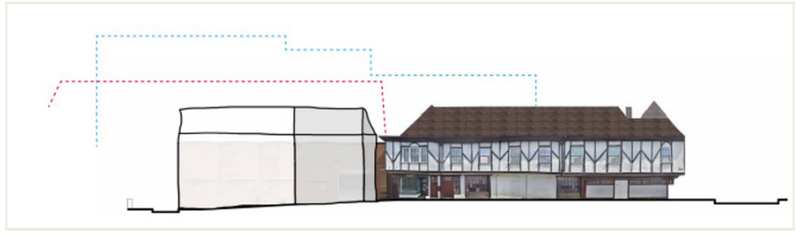

Figure 41 - Proposed built form (blue line represents pre-app 1, pink line represents pre-app 2)

Figure 42 - Proposed use at ground floor

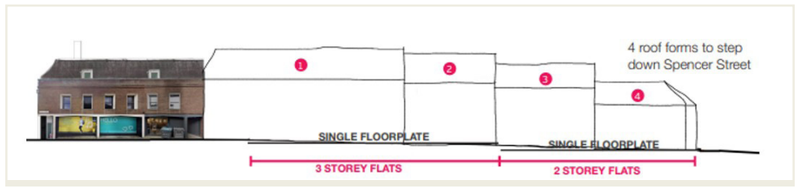

Figure 43 - Proposed use at ground floor

Pre-Application 3 Comments

6.22 Pre-application advice in relation to this scheme (reference PRE/2023/0127) stated that 'in principle, the redevelopment of the site remains acceptable in principle…the demolition of the building could be supported, provided that the proposed replacement development is considered acceptable and can be delivered'.

6.23 The feedback also set out that:

- The prevailing character of this area is of two- and three-storey buildings with pitched roofs. The prevailing style in this part of St Albans City center is of pitched roofs.
- The Council is supportive of the redevelopment of this site for residential purposes, and it is noted that the site was included as an allocation (Site UC7) within the recent Regulation 18 draft emerging Local Plan for the District. That said, this site occupies a highly prominent and central position within St Albans, whereby a high quality design is imperative in achieving an acceptable development.
- It is considered that there is a significant opportunity here to enhance the streetscape, and some element of pastiche design may potentially be acceptable. However, notwithstanding the recent changes to the NPPF, roof forms featuring steep mansards are not considered to be appropriate in this location.
- A form of development which would see the redevelopment of the site with a narrow grain and pitched roofs would be encouraged by the Council in this location.
- The concept of a courtyard style development is generally supported as this would allow for a more rational internal design of the buildings and would also open up the site and break up the current footprint of the site. The courtyard presents opportunities for introducing soft landscaping.
- The submission documents indicate that the building would be finished with materials to match the surrounding area. The preference in this city centre location would be for bricks (and not brick slips) with clay tiles. Window frames, for the residential elements, should be painted timber.

Impacts of heritage assets

- From an analysis of the indicative drawings submitted, the proposal could have an acceptable impact in relation to surrounding heritage assets, subject to the modifications and recommendations described in the previous section.
- It remains the case that the impact the proposed development would have on long range views remains a key concern in determining the acceptability of the scheme, and as per the previous pre-application advice issued there may also be other long range views impacted by the proposed development in addition to that identified from Verulamium Park.

Planning Performance Agreement

6.24 Given the account set out above, a new scheme was produced which was the subject of a Planning Performance Agreement in September 2024 (ref: PRE/2024/0092). It sought to respond to all previous pre-application advice, as far as practically possible, through the provision of a high-quality, considered and referential design.

6.25 More specifically, the proposal comprised a combination of 1- and 2-bedroom apartments, providing 53 dwellings in total with parking at basement level. Along both Spencer Street and Upper Dagnall Street properties were proposed to be 3 storeys, with this rising to 4 storeys at Cross Street. Such a proposed ridge height ensured built form in closest proximity to designated heritage assets off the Market Place was both referenced and respected, in turn ensuring new built form did not form a prominent feature in the backdrop of these structures.

6.26 Similarly, new development was proposed to be recessed from historic fabric at the site's south eastern boundary allowing for this to be both better revealed and preserved. It was also considered that setting the building line back beyond these designated heritage assets would reduce perceptions of a mass of built form within their immediate settings.

6.27 Turning to the proposed materiality and detailing, clear consideration of the site's immediate locale was evidenced, with a combination of both brick and render elevations directly referencing the character and appearance of adjoining residential streets. The use of a combination of both brick and render demonstrably breaks up the streetscene, adding visual interest while once again reducing perceptions of a mass of built form. Detailing such as a brick arch off Cross Street also directly referenced that found within the immediate locale, ensuring aesthetic assimilation when the site is considered in totality.

6.28 Although a clearly referential approach with regards to detailing and materiality is evidenced in close proximity to designated heritage assets – primarily those to the south east of the site – a contemporary approach to aspects such as fenestration was proposed to the north west. More specifically, referential sash windows are proposed across the majority of buildings with larger single glass panes located at the corners of the four storey blocks (on the corners of Spencer Street and Cross Street and Upper Dagnall Street and Cross Street).

6.29 Both fenestration and a combination of brick and render elevations engender a vertical emphasis across proposed buildings, with variations in finishes across these establishing an appearance of ad hoc development mirroring the wider character of the wider designated locale.

6.30 Such a design approach was considered to create a clear and appropriate legibility of phasing when the site is considered in conjunction with its wider environs, but also creates visual variation and therefore interest in views along these streets.

6.31 A courtyard was also proposed to be located relatively centrally within the site, breaking up the building massing. Further, a combination of roof forms around the site boundary created a varied roofscape, visually breaking up built form, particularly in longer range views. Therefore, variations across the proposed roofscape were considered to reduce the impact of height and massing when the site is viewed within the setting of a number of designated heritage assets within the wider locale, including

Figure 44 - Typical Floor Plan and Basement / Parking Level

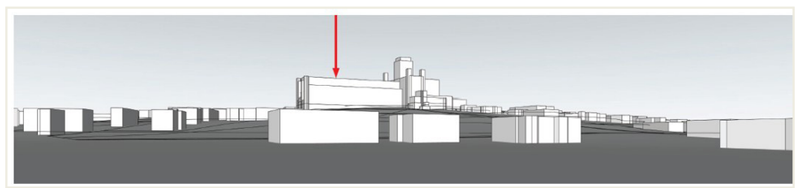

Figure 45 - Long distance view looking north from Verulamium Park. Arrow indicates location of site, which would not be appreciable behind St Albans Cathedral

Figure 46 - Proposed Spencer Street Elevation

Figure 47 - Proposed Cross Street Elevation

Figure 48 - Proposed Upper Dagnall Street Elevation

Verulamium Park.

PPA Meeting 1 Comments

6.32 Following an initial meeting as part of the PPA, notes and minutes were received from St Albans City and District Council in October 2024. Within this it was acknowledged that '*the scheme is seeking to take account of level changes and move away from previous schemes which proposed one big block. The proposal is essentially proposing a 'donut' with a tight relationship to the street and open space in the middle. A valley roof is now proposed, as well as utilisation of the basement for car parking*'.

6.33 Further, and in relation to design and heritage, it was considered that '*at present the building makes a neutral contribution to the conservation area. In this part of the city centre, it is considered that there is a mixed character, with a mix of uses in proximity to the application site. In this sense, a residential scheme would not impact upon the character of the area, and as such the key concern with the redevelopment of this scheme will be appearance... In this area, there is a mainly 'cheek by jowl' form of development, with buildings right next to one another. Therefore, a case could be made for a form of development akin to that set out in the attached plans. As a positive, the proposal appears as if it has been developed as a series of buildings, which don't appear to have all been built at the same time. It is noted that curved corners have been proposed to avoid sharp edges. What will be key however in ensuring a successful development is getting the proportions of the buildings right, as well as*

ensuring the style of the building (including its roof form) and the windows within it are appropriate. It was noted that generally in St Albans, buildings have a vertical emphasis rather than being wide'.

6.34 The meeting also facilitated conversations with regards to the mass and bulk of the proposal, with the resultant correspondence stating that '*the development should appear in the townscape as if it has always been there... The surrounding area consists of 3 storeys, but if a 4th storey can be demonstrated to fit into the context and prevailing character and roofscape then it could potentially be supported'.*

6.35 Finally, the design officer set out a number of initial comments, including:

- Important to get scale and proportion right
- Looking at it as houses / facades rather than a block is the right principle in my view
- Initial ideas of frontages - individual elements rather than one whole building and each form having its own element mirrors the existing context nicely
- Picking up adjacent buildings design is a good approach, however it can be applied more effectively to other parts of the proposal
- Agree that corners should have a different approach

PPA Meeting 2 Comments

6.36 A second meeting was then held on 14th November 2024, with the subsequent notes and minutes highlighting that, in relation to the submitted Initial Heritage Appraisal, *'it is considered that the overall conclusion that the proposal would have a minor beneficial impact is correct. It is considered that the reintroduction of a form of development at the application site which has a vertical emphasis would be beneficial. The separation of the new building and the existing listed building was considered a positive'*.

6.37 In relation to closer-range views, the corner aspects of the proposal along Cross Street were discussed. More specifically, the '*Council raised concerns that the corners appear very contemporary in the submission, and therefore there is concern that as a result the proposal may not be in keeping with the character and appearance of the area. In particular it is noted the corners do not appear as simple elevations and feature white render and balconies with glass balustrading, which could result in these prominent corners appearing very modern and out of context. Concern was raised that when the building is considered as a whole the brick to render ratio is perhaps not quite right, with perhaps too much render proposed overall which has exacerbated these concerns. It was suggested by the Council are more chamfered approach in brick may be a way forward'*.

6.38 Additionally, '*it was suggested by the developer team that a curved approach at the corners would be preferable, and that it may be possible to simplify the design and also consider the brick to render ratio*'.

PPA Final Advice Report - Ref No: PRE/2024/0092

6.39 Following the two PPA meetings already noted, a Pre-Application Advice Report was received (27th January 2025) which set out specific points in relation to the Principle of Development, Design and Heritage, Unit Mix and Tenure, Parking, Access and Servicing, Amenity, and Other Matters. Comments of relevance to matters of heritage are therefore discussed in more detail below.

6.40 As part of this submission of documentation for which this advice pertains, two options for redevelopment were provided. Within the advice it is noted that *'there is a preference for option two. This is because option two provides for a more refined appearance, whereas option one with the inclusion of the balconies is considered to result in a busy visual impact which would not be coherent with the rest of the building. Additionally, it is not considered that balconies would be in keeping with the character and appearance of the wider area. To ensure further that option two aligns with the surrounding context, the fenestration style at the corner of Spencer Street and Cross Street can be modified to incorporate smaller windows with shorter length of glazed appearance. This will avoid a contemporary aesthetic and enhance the overall consistency of the building's design to harmonize with the surrounding area's character and appearance, particularly in the treatment of corners*'.

6.41 It is then noted that in relation to the proposed roofscape, '*there is concern that the use of materials which are not traditional in nature could result in the proposed development having an alien appearance in the surrounding area'*.

6.42 It is also highlighted that '*at roof level, the residential accommodation for the most part is set behind a parapet wall and it is important to have set-back storey to help make sure the building does not have an overbearing impact on the site, which in principle could be an acceptable way of providing residential units at this level. However, when compared to earlier iterations of the scheme considered as part of the PPA, it is noticeable how much the design of these elevations has altered, whereby the Spencer Street elevation in particular now reads based on the submitted plans as essentially four storeys in height. The Cross Street elevation now, given the changes to roof level, appears as a contiguous four storey elevation. The previous iteration had a range of heights along this elevation, which contributed to the proposal being perceived as less bulky and avoided a top-heavy appearance. However, in both option 1 and 2, it appears that there is a reduction in articulation in terms of height along this elevation due to the incorporation of the additional storeys which is concerning as it may result in a top-heavy appearance. Cumulatively, there is concern that the revisions to the design of the scheme in options one and two compared to those previously presented in the PPA could have a harmful impact upon the character and appearance of the surrounding area. As a result, it is recommended that a scheme more akin to those previously presented is progressed in a future submission, so as to ensure that the proposed development is acceptable in terms of its impact on the surrounding area'*.

6.43 Of relevance within this document is paragraph 14, which highlights that *'Part 11 of the* (heritage) *appraisal concludes that the overall impact of the development would be neutral or have a beneficial (ranging from negligible to moderate) impact to the nearby historic environment. This conclusion is considered appropriate'*.

6.44 Of particular importance is the Concluding Remarks whereby it is stated that '*the principle of development in this case is supported by officers. However, concerns regarding the design of the final iteration of drawings should nonetheless be addressed in a future submission. The revisions to the design of the scheme are considered to be harmful, and as such it is recommended that a scheme more akin to those previously presented is progressed in a future submission'.*

6.45 Finally, the Review of Your Proposal sets out that the scheme is '*likely to obtain permission if all changes suggested are made'*. As a consequence of the above, a scheme has been produced which seeks to respond to all officer comments, as far as practically possible.

Proposed Scheme

7

7.0 Proposed Scheme

7.1 The scheme for which consent is sought comprises the residential redevelopment of the former Argos site, Spencer Street, St Albans. Following ongoing advice and guidance received from St Albans City and District Council - set out above - proposals have evolved and encompass the provision of a 47 unit apartment block. Given the site's location within the wider conservation area and setting of a number of designated and non-designated heritage, its historic evolution and resulting built form has been considered in conjunction with latest planning policy, specifically in order to propose appropriate design solutions that are configured to ensure the preservation of this heritage asset.

7.2 More specifically, development has once again been proposed to be recessed from historic fabric at the site's south eastern boundary, allowing for this to be both better revealed and preserved. It is also therefore considered that setting the building line back beyond these heritage assets would reduced perceptions of a mass of built form within their immediate settings.

7.3 Similarly, the roofscape in closest proximity to designated heritage assets off Market Place is proposed to be limited to three storeys ensuring this aspect of the scheme remains subservient when considered in conjunction with these. Such a ridge height also demonstrably references that found across existing built form along adjoining streets and is therefore considered referential.

7.4 Where the proposed scheme rises to four storeys, the roofscape has been designed to reduce perceptions of this additional height as far as practically possible. Therefore, additional living areas will be recessed from the primary frontage beyond a parapet.

7.5 Similarly, variations in the ridge height across the three storey elements of the scheme, in conjunction with variations across materiality seek to reduce the potential for perceptions of a bulky and/or top heavy appearance prevailing. More specifically, clear consideration of the site's immediate locale and evolution of this, is evidenced with a combination of both brick and render directly referencing the character and appearance of adjoining residential streets.

7.6 Such a design ethos is also considered to engender variations across elevations, in turn creating the appearance of a series of buildings which were not constructed at the same time. An ad hoc appearance is also considered to accrue through the use of variations in fenestration across individual elevations. The proposed fenestration, in conjunction with proposed variations in bay widths and materiality, creates a vertical emphasis across the streetscene - again reducing the potential for perceptions of a mass of built form to accrue, particularly from surrounding streets.

7.7 Here it is of relevance to note, that as a direct consequence of pre-application advice, the use of render has been reduced with the brick and render ratio creating a demonstrably referential and traditional streetscene, across all elevations.

7.8 Further, pre-application advice stated that 'a curved approach at the corners would be preferable'. Figure 49 therefore demonstrates that the proposed scheme has sought to appropriately respond to this advice with the corners at both Cross Street / Spencer Street and Upper Dagnall Street / Cross Street curving and broadly following the route of the road.

7.9 Similarly, the previously proposed fenestration at this elevation has been revised with smaller windows with a shorter length reducing perceptions of glazing at this elevation.

7.10 A courtyard is once again proposed to be located relatively centrally within the site, further breaking up the building massing. A combination of roof forms around the site boundary creates a varied roofscape, breaking up built form in longer range views. Therefore, variations across the proposed roofscape are considered to reduce the impact of height and massing when the site is viewed within the setting of a number of designated heritage assets within the wider locale, including Verulamium Park.

Figure 49 - Proposed Site Plan, Omega Architects July 2025

Figure 50 - Proposed Spencer Street Elevation, Omega Architects June 2025

Figure 51 - Proposed Cross Street Elevation, Omega Architects June 2025

Figure 52 - Proposed Upper Dagnall Street Elevation, Omega Architects June 2025

Impact Assessment

8

8.0 Impact Assessment

8.1 In order to assess the suitability of the site for the proposed development, it is necessary to determine the nature and extent of any impacts resulting from the proposal on heritage assets and/ or their settings.

8.2 When assessing the impact of a proposed development on individual or groups of heritage assets, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.

8.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels are made with reference to Table 3 in Appendix A and satisfy 'Step 3' of Historic England's GPA 3.

St Albans Conservation Area (Commercial Centre Character Area)

8.4 The Commercial Centre of St Albans Conservation Area was considered to hold a **good** level of significance as it retains a strong sense of character and the surviving buildings represent the many phases of growth and change which reached across the area.

8.5 However, the site is considered to make a **minor adverse** contribution to the significance of the character and appearance of this area. More specifically, it historically contained a variety of buildings including the red brick Methodist Chapel, with such a building typology being considered to contribute to the wider character here. The demolition of these buildings and their replacement with the former Argos building which represents no historic value or architectural merit demonstrably represents negative impingement within this area.

8.6 As set out above, the scheme represents the replacement of an inappropriate building with an alternative which exhibits building and street edges with active frontages and a locally distinctive design which references the wider character and appearance of the area. Additionally, the proposed ridge height directly responds to that established by existing designated heritage assets, ensuring a mass of built form is not established within their immediate setting.

8.7 Additionally, variations in referential finishes and plot widths, ensures an essentially ad hoc character is established, with fenestration also contributing to the establishment of a vertical emphasis of the character and appearance of the area and found across St Albans. As a consequence, the scheme is considered to make a **minor -moderate beneficial** contribution to the character and appearance of St Albans Conservation Area.

St Albans Conservation Area (wider area), including Verulamium to the west

8.8 The wider area surrounding the commercial centre presents a more verdant entrance to the core of St Albans and represents St Albans overall growth. As such, this aspect of the conservation area is considered to hold a **good** level of significance.

8.9 In views from Verulamium Park, the Commercial Centre is predominantly a mixture of relatively small scale pitched roofs with chimney stacks, at a relatively low level. However, in long views the multi storey car parks on Drovers Way are unfortunately predominantly visible, along with other positive prominent skyline buildings such as the Town Hall and the Baptist Church.

8.10 However, the application site currently represents a 1970's redevelopment scheme which exhibits no reference to local character and appearance. It is therefore considered to make a **minor adverse** contribution to the significance of established character and appearance.

8.11 The revised scheme proposes the use of locally appropriate materials, a varied roof height, and architectural forms which would integrate new buildings into the surrounding townscape. The proposed terraced appearance would create a ridge height which directly responds to adjoining designated heritage assets, reducing impacts upon their setting. Similarly, areas of proposed higher ridge heights have been set back from the parapet reducing the potential for wider views to these from the surrounding conservation area.

8.12 It is also of relevance to note that, through the implementation of a varied roofscape, which is of a demonstrably referential materiality and height, the site would not form a dominant feature within the setting of this portion of the conservation area.

8.13 It is therefore considered that the revised scheme would not negatively impinge upon the ability to appreciate the significance of this aspect of the designation by virtue of a reduced ridge height and successful assimilation into the existing streetscene through a referential materiality. Impacts are therefore considered to be **neutral.**

8.14 Here it is of relevance to reiterate information provided within the Visual Impact Assessment (fabrik, June 2025) which summarises that *'Overall, no significant negative residual effects are identified to visual receptors, and those identified as experiencing residual effects typically lie immediately adjacent to the Site boundary(receptors in private properties/ transient receptors using roads). The limited adverse visual effects are considered to diminish over time as the development assimilates into the surrounding townscape of St Albans'***.**

30 Spencer Street - Grade II

8.15 30 Spencer Street was found to hold a **good** level of significance. However, the Argos building currently detracts from the historic character of the area and is very large in scale compared to the modest residential buildings along the northern aspect of Spencer Street. As a consequence, it was found to make a **minor adverse** impact upon the setting of this designated heritage asset.

8.16 The revised scheme would engender the replacement of the existing building and represent improvement of the currently poor contribution to streetscene. More specifically, varied plot widths and referential ridge heights demonstrably respond to the immediate context and therefore setting of this designated heritage asset.

8.17 A referential materiality would also seek to reduce perceptions of a mass of built form, creating an ad hoc character would also preserve the established significance of the setting here. A **moderate beneficial** impact is therefore considered to accrue.

26 and 28 Spencer Street - Grade II

8.18 These assets were found to hold a **good** level of significance. The current Argos building can be seen to detract from the significance of the setting of this designated heritage asset, principally by virtue of large scale and limit reference to historic and architectural materials, forms and styles. In its current condition, the site is considered to have a **minor adverse** impact upon the significance of the setting of these assets.

8.19 The revised scheme has sought to address officer concerns with regards to design, effectively engendering an aesthetic of residential streets which have been developed in an ad hoc manner. Therefore, variations across materiality, including the use of more brick as opposed to render, creates a more vertical emphasis, with aspects such as a referential ridge line and recessed upper floors reducing the potential for a mass of built form to be perceived. The impact upon the setting of these designated heritage assets is therefore considered to be **moderate beneficial.**

1 and 3 St Peter's Street

8.20 The asset was considered to hold a **good** level of significance.

8.21 Nos 1-3 are located on the corner of St Peter's Street and Spencer Street, approximately 50 metres to the east of the site. As the primary façade of the asset looks towards the Market Place, the buildings along Spencer Street are a less significant part of its setting. While the site in its current form does not correspond with the historic character of the area, its scale and use of red brick means it blends in some limited way into its surroundings – although the blocky and unrelieved design is not compatible with the context. Therefore, the site is considered to make a **negligible - minor adverse** contribution to the setting of the asset.

8.22 Through the use of high-quality, referential and considered materials, roof forms, and plot widths, the scheme is considered to represent the logical redevelopment of this currently disused site. The proposed scheme would represent the clear enhancement of the status quo through the appropriate redevelopment of a poor quality streetscene. However, the overarching enhancement which would accrue is considered minor due to scheme only being discernible in tunnelled / near distance views for a short interval within the view. A **minor beneficial** impact is therefore considered to accrue.

Town Hall Chambers - Grade II

8.23 The asset is considered to hold a **good** level of significance overall. Given the current scale and massing of the disused former Argos building, it was found to make a **medium adverse** contribution to the significance of its setting.

8.24 Proposed built form will be recessed beyond this heritage asset, as far as practically possible, ensuring historic fabric is both better revealed and preserved. Here, it should be noted that the significance plan set out above highlights that the existing building directly abuts built form at this designated heritage asset. However, the building abuts that which is of a later insertion and therefore of limited to no significance. Physical removal would not impact historic fabric and therefore significance.

8.25 Further, the design of the revised scheme exhibits clear consideration of designated fabric, with a reduced ridge height directly responding to built form here. As a consequence, proposed built form in closest proximity to this asset will be lower than that already established, ensuring an appropriate subserviency is achieved. Further, a varied, referential, and reduced ridge height will ensure perceptions of new built form above this heritage asset would be limited. Should new ridges be perceptible above this, a referential materiality and profile would ensure successful assimilation into its immediate setting. A **negligible - minor beneficial** impact is therefore considered to accrue.

27 Market Place - Grade II

8.26 The asset is considered to hold a **good** level of significance overall. The site is located to the north-west of this asset and although the site does not contribute to the historic character of the area, its impact is mitigated by the use of red brick and its low height. There are possibly some views of the site from rear windows of the asset but there are no full views as in the case of Town Hall Chambers. The site was therefore considered to make a **minor adverse** contribution to the setting of the asset.

8.27 Proposed built form will be recessed beyond this heritage asset, as far as practically possible, ensuring historic fabric is both better revealed and preserved. Again, it should be noted that the significance plan set out above highlights that the existing building directly abuts built form at this designated heritage asset. However, the building abuts that which is of a later insertion and therefore of limited to no significance. Physical removal would not impact historic fabric and therefore significance.

8.28 Additionally, a referential ridge height would ensure clear subservience when considered in conjunction with this designated heritage asset, with a referential materiality ensuring clear enhancement of the site and contribution to the setting of this asset. A **negligible - minor beneficial** impact is therefore considered to accrue.

The Old Moot House - Grade II

8.29 The asset was considered to hold a **good** level of significance overall. The site is located to the north of this asset and is physically separated from this by an alleyway to the rear of the existing buildings. The Old Moot House fronts onto Upper Dagnall Street and Market Place, with the site itself forming a minor feature within the view to the rear. As the site cannot currently be considered to contribute to the historic character of the area, it was found to make a **minor adverse** contribution to the setting of the asset

8.30 The proposed new building will be set back from the building line established by these heritage assets ensuring they do not form an overbearing mass in views. Additionally, a referential ridge height, coupled with a high-quality design would establish the logical continuation of both use and built form as has already been established within the setting of this heritage asset. Similarly, a referential materiality – when considered in conjunction with the wider context – would also facilitate the overarching enhancement of the site and its current contribution to the setting of this asset. However, enhancement is considered minor due to scheme only being discernible in tunnelled / near distance views. As a consequence, a **minor beneficial** impact is considered to accrue.

2 and 4 Upper Dagnall Street - Grade II

8.31 The assets are considered to hold a **good** level of significance overall. The solid red brick mass of the current disused building both physically and visually contrasts to the timber-framed jettied elevation of this designated heritage asset. It is therefore considered to make a **low-medium adverse** contribution to the significance of its setting.

8.32 The proposed built form will be set back from the building line established by these heritage assets ensuring they do not form an overbearing mass. Additionally, a referential ridge height and materiality – when considered in conjunction with the wider context – would also facilitate the overarching enhancement of the site and its current contribution to the setting of these assets. The scheme would also result in the removal of existing built form which is currently considered to represent negative impingement within the setting of this heritage asset. As a consequence, a **minor - moderate beneficial** impact is considered to accrue.

The Hertfordshire Advisor - Grade II

8.33 This asset was considered to hold a **good** level of significance overall. The solid red brick massing of the existing building on site creates a sudden contrast to the timber-framed jettied elevation. However, the height of the Argos building is appropriate to the scale of the historic buildings. Therefore, the site was considered to make a **low - medium adverse** contribution to the setting of this asset.

8.34 The scheme seeks to establish a built form which is set back from the building line established by this heritage asset, in turn ensuring this does not form an overbearing mass in views. Additionally, a referential ridge height, in conjunction with a high-quality, considered and referential design limits perceptions of a mass of built form within the setting of this heritage asset. Further, a referential materiality – when considered in conjunction with the wider context – would also facilitate the overarching enhancement of the site and its current contribution to the setting of this asset. A **minor - moderate beneficial** impact is therefore considered to accrue.

The King's Head - Grade II

8.35 This asset is considered to hold a **good** level of value overall. As the site is located approximately 100 metres to the north of this asset and by virtue of intervening built form, there is no direct relationship between the site and The King's Head. Overall, the site was considered to make a **negligible adverse** contribution to the setting of this asset.

8.36 The proposed elevation, fronting Upper Dagnall Street is set back from the current building line established by the existing building. As a consequence, it will also be recessed beyond the building line established by designated heritage assets along this route, reducing the potential for perceptions of a mass of built form to accrue. Further, a referential and reduced ridge height will ensure new built form would not create a discernible feature above existing rooftops, remaining subservient when considered in conjunction with these. Finally, a referential materiality would successfully assimilate the site in the to context and setting of this designated heritage asset. As the scheme represents the over-arching enhancement of the site, a **minor - moderate beneficial** impact is considered to accrue.

21 and 21A Market Place - Grade II

8.37 21 and 21A Market Place are considered to exhibit a **medium** significance. As there is no direct visual or physical relationship between these designated heritage assets and the site, it was found to make a **neutral** contribution to the significance of the assets' setting.

8.38 The proposed referential and subservient ridge height in closest proximity to designated heritage assets off Market Place results in no perceptions of new built form within the setting of these designated heritage assets. As the scheme would not alter the current ability to appreciate significance, a **neutral** impact is considered to accrue.

Wellington Public House - Grade II

8.39 The Wellington Public House is considered to hold a **medium** level of significance. As intervening built form limits any direct views or relationship between this designated heritage asset and the application site, it was found to make a **neutral** contribution to the significance of its setting.

8.40 Given the proposed referential and subservient ridge height of the scheme, coupled with intervening built form, proposals would not fundamentally alter the current ability to appreciate significance. As such, a **neutral** impact is considered to accrue.

Court House, Town Hall - Grade II*

8.41 The asset was considered to hold a **good - high** level of significance overall. Although there are possible glimpses between this designated heritage asset and the application site, there is no direct relationship between the two. As a result, the site in its current form is considered to make a **neutral** contribution to the setting of the asset.

8.42 The revised scheme proposes a reduced ridge height which will ensure new structures will not form an overbearing and/or discernible feature within the setting of this heritage asset. It would not alter the way in which the significance of this asset is appreciated nor would redevelopment

alter the ability to appreciate significance. A **neutral** impact is therefore considered to accrue.

Premises Occupied by Uptons Ltd - Grade II

8.43 The asset is considered to hold a **good** level of significance overall. As there is no visual or physical relationship between the site and this designated heritage assert, it was considered to make a **neutral** contribution to the significance of the setting of this designated heritage asset.

8.44 Given the high-quality, referential and considered nature of the proposed scheme, it would more than amply result in the clear enhancement of the site specific scenario through replacement of poor streetscene quality with a varied roofscape which demonstrably responds to the immediate context and topography of this. It would also represent the logical continuation of use established within immediate locale.

8.45 Further, a referential materiality and roof forms, in conjunction with plot widths which reference that found within adjoining streets would further result in the overarching enhancement of the site. However, it should be noted that enhancement is considered minor due to scheme only being discernible in tunnelled / near distance views for a short interval within the view. A **negligible beneficial** impact is therefore considered to result.

30 and 32 Market Place - Grade II

8.46 These assets were considered to hold a **good** level of significance overall The site is located approximately 100 metres to the north-west of the assets. Due to intervening built form, there are no views of the site from the assets. The site was therefore considered to make a **neutral** contribution to the setting of the assets.

8.47 The scheme is considered to represent the clear enhancement of the site-specific scenario through the replacement of poor streetscene quality with a varied roofscape which demonstrably responds to the immediate context and topography of the site. Residential redevelopment would also create the logical continuation of use established within immediate locale.

8.48 The revised scheme also exhibits a referential materiality and roof forms which reduce the potential for perceptions of a mass of built form to accrue within the setting of these designated heritage assets. As the overarching enhancement of the site is considered minor due to scheme only being discernible in tunnelled / near distance views for a short interval within the view a **negligible beneficial** impact is considered to accrue.

26 Market Place - Grade II

8.49 This asset was considered to hold a **good** level of significance overall. Due to intervening built form, there are no views of the site from this asset and as a consequence, it was considered to make a **neutral** contribution to the significance of its setting.

8.50 Due to the proposed reduced ridge height, coupled with intervening built form, the scheme would not form a discernible feature within the setting of this heritage asset, and would not therefore alter the current ability to appreciate significance. However, it should be noted that through the provision of a high-quality, referential and considered design the site-specific scenario would be more than amply enhanced. A **negligible beneficial** impact is therefore considered to accrue.

32 – 62 and 33-51 Spencer Street - Locally Listed

8.51 These two groups of locally listed buildings retain a strong sense of character but are unremarkable in design and appearance. They are considered to hold a **low** level of significance overall.

8.52 The site is located on Spencer Street, at the south eastern end. The junction of Cross Street with Spencer Street experientially separates the western and eastern end of Spencer Street, thereby separating the site from the locally listed group. While the site is visible in some views, it is not a primary part of the setting. The site was therefore considered to make a **nil** contribution to the setting of the assets.

8.53 The scheme seeks the replacement of a currently poor quality streetscene with a development which demonstrably appropriately responds to its immediate context. Therefore, a varied roofscape, variations in plot widths, and a referential materiality would both establish the logical continuation of established use within this location and (more generally) enhance the site as a whole. A **moderate beneficial** impact is therefore considered to accrue.

8-24 Spencer Street - Locally Listed

8.54 This group of buildings along Spencer Street are located to the eastern end of this. They also date to the 19th century and are similar in character, with slate roofs, sash windows, and are built of red and blue brick. Many of the ground floor buildings also feature bay windows which could have originally been for shop displays. They are considered to hold a **low** level of significance overall.

8.55 Directly opposite the group is the Argos building. The extensive and blank brick walls detract from the residential character of the street, but the red brick is in keeping with the materials of the surrounding buildings. Overall, the site is considered to make a **medium adverse** contribution to the setting of the assets.

8.56 The revised scheme seeks to directly reference the character established along the eastern extents of Spencer street through the provision of a referential materiality, variations in plot widths creating an ad hoc character, and variations in roof forms reducing the potential for a mass of built form to be established. Further, the residential redevelopment of the site represents the logical continuation of established use along Spencer Street, with the removal of the current building also representing the clear enhancement of the current scenario. A **moderate beneficial** impact is therefore considered to accrue.

Dagnall Street Baptist Church - Locally Listed

8.57 The Dagnall Street Baptist Church was built in 1885. It is in the Gothic Revival style and is built of red brick, with stone dressings and slate roofs. It is considered to hold a **low - medium** level of significance overall.

8.58 The site is located to the east of the church. It is partially hidden from view by the Cross Street Centre but there are still views in which they both feature. The blank, angular and almost hostile appearance of the existing building of the site is at odds with the delicate vertical proportions of the church and there is a strong contract between the two sites. As a consequence, the existing buildings on the site were considered to make a **medium adverse** impact on the setting of the Baptist Church.

8.59 The revised scheme seeks to directly reference the character established along the streets which surround the Baptist Church through the provision of a referential materiality, variations in plot widths creating an ad hoc character, and variations in roof forms reducing the potential for a mass of built form to be established. Where higher ridge heights in close proximity to this building are proposed, these have been recessed to reduce the potential for visual impacts. Further, the residential redevelopment of the site represents the logical continuation of established use within the setting of the baptist church, with the removal of the current building also representing the clear enhancement of the current scenario. A **moderate beneficial** impact is therefore considered to accrue.

The White Swan Public House - Locally Listed

8.60 The current White Swan building first appears on the 1880 Ordnance Survey map, although parts of the building may be older and was considered to be of **low** significance overall.

8.61 The site is located directly to the north-west of the asset and is visible from the pub. Its blank and angular appearance provides very little animation of the street and it feels anonymous in the streetscene. The site in its current form was therefore found to make a **medium adverse** contribution to the setting of the asset.

8.62 Through ongoing discussions, the revised scheme has sought to directly reference the character established along the streets which surround the pub through the provision of a referential materiality, variations in plot widths creating an ad hoc character, and variations in roof forms reducing the potential for a mass of built form to be established. Built form in close proximity to the pub is proposed to be recessed beyond the building line created by the existing building on site, reducing the potential for visual impacts. Further, the residential redevelopment of the site represents the logical continuation of established use within the setting of the pub, with the removal of the current building also representing the clear enhancement of the current scenario. A **moderate beneficial** impact is therefore considered to accrue.

CONCLUSIONS

9

9.0 Conclusions

9.1 This Heritage Statement has been produced by Bidwells on behalf of Denton Homes in relation to the proposed residential redevelopment of the former Argos building off Spencer Street, St Albans.

9.2 Following ongoing discussions between the design team and the Local Planning Authority the proposals involve the removal of existing poor-quality buildings on the site and their replacement with the development which will enable active street frontages to be provided to three streets within the core of the St Albans Conservation Area. The proposed buildings range in height from three to four storeys, and have been designed to take into account potential townscape enhancement opportunities. Consideration has been given to how the scheme will be experienced in short-, medium- and long-range views.

9.3 The proposals offer the opportunity to remove an unsightly, blocky and blank-looking building in the heart of the historic town centre. The potential for enhancement arising to the character and appearance of the Conservation Area is very significant, as it is also for the setting of other nearby designated and non-designated heritage assets.

9.4 The scheme in its current form has been revised following a number of pre-application submissions, a Planning Performance Agreement and subsequent advice. Therefore, proposals now exhibit a demonstrably referential location, orientation, massing and height, that responds to not only the site context but its immediate locale and topography. As a consequence, the proposed ridge height has been reduced to encompass a combination of 3 and four storey buildings with variations in materiality ensuring the wider vertically of streets within St Albans is referenced. Similarly, variations in materiality also ensure an ad hoc appearance prevails, establishing a phased character along this street. Such a design approach is considered to more than amply reduce the visual impact of the proposed buildings.

9.5 This report considers the impact of the proposed scheme on the significance of the built heritage assets identified, including the contribution made by their settings. This approach to impact-assessment is required in order to satisfy the provisions of Sections 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act of 1990 in relation to listed buildings and the National Planning Policy Framework (NPPF) where the impact of development on heritage assets or their settings is being considered (Paragraphs 207-219).

9.6 Additionally, the scheme represents the logical continuation of built form and use, as this has already been established along neighbouring streets. Finally, a referential roof form in conjunction with aesthetically appropriate materials will establish a clear legibility of phasing here, and more than amply enhance the current site-specific scenario. As a consequence, the level of impact arising from the replacement of the existing buildings on the site with a design suited to its historic context will range between, **negligible** to **moderate beneficial** and in some cases, the impacts will be **neutral**.

9.7 As discussed within the R (Palmer) v Herefordshire Council ([2016] EWCA Civ 1061 case, Lord Justice Lewison concluded that “the decision maker may legitimately conclude that although each of the effects has an impact, taken together there is no overall adverse effect on the listed building or its setting.” It is apparent that in assessing the impact of a proposal, the heritage benefits and heritage harms do have individual impacts upon an asset’s significance. However, when taken together, the proposals could legitimately be considered to not have an adverse overall impact overall impact upon the significance of the asset.

9.8 We therefore find that the proposed alterations to have had special regard for the desirable objective of preserving the special interest of the listed buildings and their settings in accordance with Section 16(2), 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 and have paid special attention to the desirability of preserving or enhancing the character or appearance of the St Albans Conservation Area in accordance with Section 72(1). In addition to satisfying these provisions of the Act, the NPPF Paragraphs 207-219 are also satisfied.

APPENDICES

10

10.0 APPENDICES

APPENDIX A_METHODOLOGY

Heritage Assets

A heritage asset is defined within the National Planning Policy Framework as "a building, monument, site, place, area or landscape identified as h*aving a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*" (NPPF Annex 2: Glossary).

'Designated' assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. 'Non-designated' heritage assets are assets which fall below the national criteria for designation.

The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that "*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*" (Paragraph: 039 Reference ID: 18a-039-20190723)

However, the PPG goes on to clarify that "a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets."

Meaning of Significance

The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the "*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*" (Page 2, Article 1.2)

The NPPF (Annex 2: Glossary) also defines significance as "t*he value of a heritage asset to this and future generations because of its heritage interest. The 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 British Standards BS7913 (2013) notes that "the attributes that combine to define the significance of a historic building can relate to it physical properties or to its context. There are many different ways in which heritage values can be assessed."
Significance can therefore be considered to be formed by a collection of values.

Assessment of Significance

It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 207 of the NPPF.

The Historic England document 'Conservation Principles' states that "*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment*."

The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other assets sharing similar values;
- Articulate the significance of the asset.

At the core of this assessment is an understanding of the value/ significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's 'Conservation Principles' sets out a grouping of values as follows:

Evidential value – 'd*erives from the potential of a place to yield evidence about past human activity…Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them…The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*' (Page 28)

Aesthetic Value – '*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects… Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive*'. (Pages 30-31)

Historic Value – 'd*erives from 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… Association with a notable family, person, event, or movement gives historical value a particular resonance...*
The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value'. (Pages 28-30)

Communal Value – "*Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it… Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them…They may relate to an activity that is associated with the place, rather than with its physical fabric…Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there*". (Pages 31-32)

Historic England advice Note 12 notes that '*interest may be archeological, architectural, artistic or historic*.'

The British Standards set out a simpler approach which '*is to think of a historic building's significance as comprising individual heritage values'*. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.

It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

BIDWELLS

Contribution of setting/context to significance

In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.

Historic England's Conservation Principles defines setting as "*an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape."*

It goes on to state that "*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*" (page 39).

In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.

There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established 'James Semple Kerr method' which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the Design Manual for Roads and Bridges (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

The first stage of our approach is to carry out a thoroughly-researched assessment of the significance of the heritage asset, in order to understand its value:

TABLE 01 ASSESSMENT OF SIGNIFICANCE

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

Once the value/significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. Table 2 sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.

An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).

Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

TABLE 02 ASSESSMENT OF SENSITIVITY

SENSITIVITY	EXPLANATION OF SENSITIVITY
HIGH	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
MODERATE	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
LOW	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Summary of Assessment

Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is "proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance" as set out in Paragraph 207 of the National Planning Policy Framework.

Research Methodology

This Heritage Statement is the result of a robust process which assesses relevant documentary research, including Historic Environment Records, historic maps, drawings and reports, as well as archive material where relevant and professional judgment.

TABLE 03 ASSESSMENT OF IMPACT

MAGNITURE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	**Adverse**: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction. **Beneficial**: The proposals would remove or successfully mitigate existing and sig-nificant damaging and discordant impacts on assets; allow for the substantial resto-ration or enhancement of characteristic features
High	**Adverse**: Impacts will damage cultural heritage assets; result in the loss of the as-set's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood. **Beneficial:** The proposals would remove or successfully mitigate existing damag-ing and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, un-derstanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.
MEDIUM	**Adverse:** Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the as-set; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised. **Beneficial**: Benefit to, or partial restoration of, key characteristics, features or ele-ments; improvement of asset quality; degradation of the asset would be halted; the setting and/ or context of the asset would be enhanced and understanding and ap-preciation is substantially improved; the asset would be brought into community use.
MINOR/LOW	**Adverse**: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised **Beneficial**: Minor benefit to, or partial restoration of, one (maybe more) key charac-teristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; commu-nity use or understanding and appreciation would be enhanced
NEGLIGIBLE	Barely discernible effect on baseline conditions but a slight adverse or beneficial impact
NEUTRAL	A change or effect which is neither adverse nor beneficial in impact
NIL	No change in baseline conditions

BIDWELLS

APPENDIX B_HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY

Planning (Listed Buildings & Conservation Areas) Act 1990

The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.

- Section 16(2) states "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."
- Section 66(1) reads: "In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, 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."
- In relation to development on land within Conservation Areas, Section 72(1) reads: "Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

As the proposal does not involve an application for Listed Building Sections 16(2) does not apply in this instance.

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) was revised in December 2024. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that "*our historic environments... can better be cherished if their spirit of place thrives, rather than withers.*" The relevant policy is outlined within chapter 16, 'Conserving and Enhancing the Historic Environment'. This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a "*manner appropriate to their significance*" (Paragraph 202).

NPPF directs local planning authorities to require an applicant to *"describe the significance of any heritage assets affected, including any contribution made by their setting" and the level of detailed assessment should be "proportionate to the assets' importance*" (Paragraph 207).

Paragraph 208 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, "t*o avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal*". This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset's relative significance, in the form of a Heritage Impact Assessment.

Paragraph 211 states that local planning authorities should have regard to the importance of the retention 'in-situ' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.

Paragraph 212 requires that "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*"

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, "*clear and convincing justification*" (Paragraph 213). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 214 states the following:

"*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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

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

The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in "less than substantial harm", paragraph 215 provides the following:

"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, where appropriate, securing its optimum viable use."

It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

In the case of non-designated heritage assets, Paragraph 216 requires a Local Planning Authority to make a "balanced judgement" having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

With regard to Conservation Areas and the settings of heritage assets, paragraph 219 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *"proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably*."

Broader design guidance is given in Chapter 12, 'Achieving well-designed places'. The 2021 NPPF introduced the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect 'local character' in order to create 'beautiful and distinctive places' (paragraph 133).

Paragraph 139 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the 'standard of design' providing they conform to the 'overall form and layout of their surroundings.

Planning Practice Guidance (PPG) (2019)

The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.

In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG notes the following in relation to the evaluation of harm: "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." (Ref ID: 18a-018-20190723).

This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a "high test".

In relation to non-designated heritage assets, the NPPG explains the following:

"*Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*"

It goes on to clarify that: "*A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets*."

This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

"New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future" (page 59).

Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *"The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting*." (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: "*assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness*." (page 1)

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

This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: *'A staged approach to proportionate decision taking' provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:*

Step 1: Identify which heritage assets and their settings are affected
Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
Step 4: Explore ways to maximise enhancement and avoid or minimise harm
Step 5: Make and document the decision and monitor outcomes'

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Local Policy

10.1 The current adopted Local Plan is The District Local Plan Review 1994. This is being replaced by a new Local Plan. The policies listed in the List of Saved Policies are the remaining operational policies within the District Local Plan Review 1994. Those policies of relevance from a heritage perspective include: 2, 5, 69, 70, 85, 86, and 87.

BIDWELLS

Bidwells is a trading name of Bidwells LLP,
a limited liability partnership, registered
in England and Wales with number
OC344553. Registered office: Bidwell House,
Trumpington Road, Cambridge CB2 9LD