

A National Amenity Society

Mr Simon Rowles
Planning Officer
Herefordshire Council
By email: planning_enquiries@herefordshire.gov.uk

23rd August 2023

61 Commercial Street, Hereford, Herefordshire, HR1 2DJ. Application: 232255

Dear Mr Rowles,

Thank you for notifying the Council for British Archaeology (CBA) about the above application. Based on the information supplied with this application, the CBA offer the following advice to assist you in your decision making.

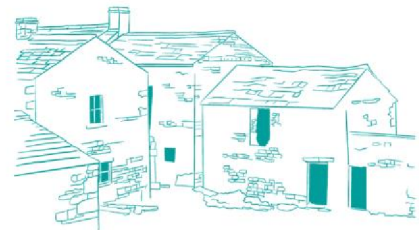
Significance

The national importance of 61 Commercial Street is recognised by its designation as a Grade II Listed building (NHLE No. 1280222). The building's List entry is scant on detail but does note that behind its 19th century façade there is a medieval building. Surviving 17th century building fabric will be an important component of the site's heritage significance.

We further note that the site is within Hereford's Central Area Conservation Area. The building's current condition means it makes a neutral contribution to the character and appearance of the conservation area. Appropriate plans to alter 61 Commercial Street should consider the requirements of NPPF paragraph 190, which are;

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.*



Comments

Photographs demonstrate that the site has suffered from a number of unsympathetic interventions in the 20th century, making it very possible to better reveal the building's significance through a sympathetic scheme of works. It should be expected that any internal strip out will reveal historic building fabric. For example, there appears to be a boxed in beam on the first floor and the very low ceilings in that room are likely to be masking earlier ceilings.

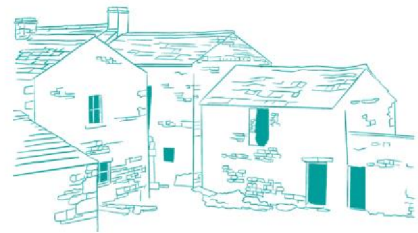
The CBA are concerned about the materials that are proposed for inside the listed building and the impact they will have on historic fabric. For example, pouring a 10mm latex levelling floor screed on old timber floors will prevent any ventilation around the wood, which can result in damp, rot, decay and potentially infestation. New internal doors are proposed. No information is given about the existing doors – are they historic fabric? At present this application does not meet fundamental requirements of paragraphs 194 and 199 of the NPPF. The lack of assessment of significance also jeopardises your LPA's ability to discharge the duties placed on you by paragraph 195.

The CBA very much support the use of spaces above commercial premises for domestic use, we therefore welcome the proposal to create a manager's flat in principle. However, we are concerned about the quality of accommodation that will be achieved in a single room. Creating a flat that is genuinely liveable is far better for the building's sustainable future. The CBA would very much encourage your LPA to work with the applicants to achieve a residential unit over both the 1st and 2nd floors. To enable this, could a staff toilet be achieved on the ground floor?

Recommendations

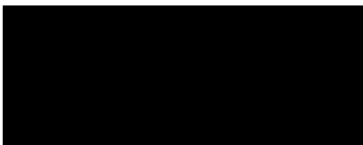
It is easy to understand from the photographs why the applicants may believe these proposals will not impact the significance of a medieval building. The CBA believe these proposals, as they stand at present, are likely to harm medieval building fabric and further erode the character and appearance of the conservation area. We therefore urge your LPA's conservation team to work with the applicants to achieve a revised approach to the site.

The CBA recommend that a new shopfront within this conservation area should look to contribute to its historic character. An apartment above the takeaway premises would be greatly improved if it was bigger than a single room. Any internal building materials need to operate sympathetically with the historic fabric. A revised approach to the site should be led by the requirements of NPPF paragraph 190 as well as paragraphs 194, 195 and 199.



I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,



Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021.**