



Historic England

Sir/Madam The Planning Inspectorate S62A Applications Team
3rd Floor, Temple Quay House
2 The Square, Temple Quay
Bristol
BS1 6PN

Direct Dial: [REDACTED]

Our ref: P01576161

8 May 2024

Dear Sir/Madam S62A Applications Team

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**PROMENADE HOUSE, CLIFTON DOWN, CLIFTON, BRISTOL
Application No. S62A/2024/0040**

Thank you for your letter of 23 April 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Summary

The proposed development would adversely impact on the setting of the Grade II* villa and other heritage assets nearby, and cause harm to significance, which has not been justified. We advise that alternative sites and design approaches are explored.

Significance of Designated Heritage Assets

Promenade House sits in an enviable position within Clifton Down and the Clifton Conservation Area and alongside a number of impressively large 19th century villas, constructed in Bath stone with decorative neo-classical masonry and an impressive full height bowed front bay. It has been extended to the rear during late 20th century and is used as offices with ancillary parking to the rear and side aspect. The property also sits with the combined settings of other designated heritage assets, some of which are also highly graded. Its significance lies in its aesthetic value and is complemented by its group value with neighbouring properties.

Promenade House is designated as Grade II*, and as such is in the top 8% of listed buildings. Therefore, greater weight should be given to its conservation. The National Planning Policy Framework (NPPF) defines 'conservation' as 'the process of



1ST FLOOR FERMENTATION NORTH FINZELS REACH HAWKINS LANE BRISTOL BS1 6JQ

Telephone 0117 975 1308
HistoricEngland.org.uk





maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance'.

Summary of proposals.

The proposed development is for a tented structure to the front of the building, presently occupied by raised beds with the garden. The purported function of the structure is for covered activities associated with the existing function of the building.

Impact of the Proposed Development

The front garden of Promenade House, facing onto Clifton Down creates a verdant setting for this substantial villa and this is most prominent from Percival Road, although if the existing hedge and trees on the western boundary were to be lowered, pruned or removed, the site would be more conspicuous from Clifton Down. The oblique view of the principal facades on the group of Grade II* villas from Percival Road reveals their high architectural status and this has not been challenged by any additions or unsympathetic development to the west.

The proposals would introduce an alien form of construction to the front aspect of the villa and despite its proposed 'tan' colour finish, presumably chosen to complement the ashlar stone of the host building, it would be prominent within key views and cause harm to its significance. The structure is proposed to be a maximum height of 4m, which is likely to challenge the primacy of key architectural components of not only Promenade House, but that of the two villas further to the north.

In terms of construction, such an addition would not weather well in the medium to longer term and this could result in a detracting addition to a high-quality ensemble of significant architectural set pieces.

While the application site does not exceed 1000m² within the Conservation Area and therefore does not fall within our stator remit, we also acknowledge that the proposed development will result in impact upon the character and appearance of the Conservation Area.

Planning Legislation & Policy Context

Central to our consultation advice is the requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 in Section 66(1) for the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".



1ST FLOOR FERMENTATION NORTH FINZELS REACH HAWKINS LANE BRISTOL BS1 6JQ

Telephone 0117 975 1308
HistoricEngland.org.uk





Section 72 of the act refers to the council's need to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in the exercise of their duties.

When considering the current proposals, in line with paragraph 200 of the NPPF, the significance of the asset requires consideration, including the contribution of its setting. The setting of Promenade House is a major aspect of its significance.

Paragraph 205 states that in considering the impact of proposed development on significance, **great weight** should be given to the asset's conservation and that the more important the asset the greater the weight should be. Promenade House is Grade II*, a heritage asset of the highest significance. Paragraph 206 goes on to say that clear and convincing justification is needed if there is loss or harm.

Historic England's advice is provided in line with the importance attached to significance and setting with respect to heritage assets as recognised by the Government's revised National Planning Policy Framework (NPPF) and in guidance, including the Planning Practice Guidance (PPG), and good practice advice notes produced by Historic England on behalf of the Historic Environment Forum (Historic Environment Good Practice Advice in Planning Notes (2015 & 2017)).

Heritage assets are an irreplaceable resource (NPPF, paragraph 189) and consequently in making your determination your authority will need to ensure you are satisfied you have sufficient information regarding the significance of the heritage assets affected, including any contribution made by their settings to understand the potential impact of the proposal on their significance, and so to inform your own assessment of whether there is conflict between any aspect of the proposal and those assets' significance and if so how that might be avoided or minimised (NPPF paragraph 195).

The significance of a heritage asset can be harmed or lost through alteration or destruction of the asset or development within its setting. As heritage assets are irreplaceable, any harm (whether substantial or less than substantial) is to be given great weight, and any harm to, or loss of, the significance of a designated heritage asset (or site of equivalent significance) should require clear and convincing justification.

Position.

The proposed development has not been suitably justified in a clear and convincing manner, as required by the NPPF. We are not persuaded that a cogent case for the





requirements of such a facility has been provided. It has not been demonstrated why alternative locations, such as the rear areas of the building, have been suitably discounted. Given the modern addition to the rear and associated car park, this is less sensitive to change than the proposed site, and therefore we advocate this is considered as an alternative, which may still result in some harm, but significantly less than the front of the villa. Alternative designs, that may well minimise any harm, should also be explored.

We advise that the case for the proposed development is more robust and that alternatives are explored further, together with their relevant impacts and potential harm. As it stands, the visual impact, although not fully demonstrated within the submitted documents, would be harmful and we would resist such a structure, or indeed anything to the front/west aspect of the Grade II* villa. Alternative sites and form should be considered, and we would be happy to engage and provide further advice on these, as and when they are submitted.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 205, 206 and 212 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Stephen Guy

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



1ST FLOOR FERMENTATION NORTH FINZELS REACH HAWKINS LANE BRISTOL BS1 6JQ

Telephone 0117 975 1308
HistoricEngland.org.uk





Historic England



1ST FLOOR FERMENTATION NORTH FINZELS REACH HAWKINS LANE BRISTOL BS1 6JQ

Telephone 0117 975 1308
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.