

From: Ross Anthony [REDACTED]
Sent: Friday, June 28, 2024 10:51 AM
To: Section 62A Applications Non Major <section62anonmajor@planninginspectorate.gov.uk>
Subject: Application Ref: S62A/2024/0042/LBC - 57 The Old Port House, Prince Street, City Centre, Bristol, BS1 4QH

[REDACTED]
FAO: Section 62A Applications Team

Address: 57 The Old Port House, Prince Street, City Centre, Bristol, BS1 4QH
Application Ref: S62A/2024/0042/LBC

Proposal: A change of use to the 3rd & 4th floor from a hostel to a hotel. The 3rd and 4th floor will be upgraded to comply with building regulations. The alterations to the listed building include the upgrade of walls, floors, windows and doors. Installation of a lift and air con units. As well as layout changes to reduce travel distances.

Statutory Remit: Historic Buildings & Places (HB&P) is a consultee for Listed Building Consent applications, as per the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.

Comments: Thank you for notifying HB&P about the above s.62 application. HB&P have reviewed the documents available online and provide the following comments for consideration.

Para. 200 of the NPPF (2023) requires suitable information, justification and evidence be submitted in support of any application involving alterations to a listed building, as it is important that the application is informed by a thorough understanding of the existing structure and its fabric.

HB&P are concerned about the lack of detail provided about the historic development of the heritage asset (including a phasing plan) and the condition, significance and nature of the existing historic building fabric. Nor is there any analysis of the impact of the proposed alterations on that fabric.

The proposed alterations are themselves poorly explained and many of the alterations e.g. insertion of so many en-suites, could potentially result in the loss of historic building fabric and erode the historic character of the building, all of which contribute to the building's significance. In summary it fails to meet the requirements of Para. 200 of the NPPF.

The insertion of so many en-suites is a particular concern, given the extensive services that will need to be installed. No details are provided about where these services will run and how they will affect the building – do the floors or ceilings need alterations to affix these? Will service runs require alterations to the lower floors that have been marked 'not surveyed'? How will the installation of acoustic and fire separation measures affect the existing floors, ceilings and walls?

There is also no analysis or how the rooms subdivision will affect the spatial qualities of the warehouse and the character of the building. In its current form, it would appear to be an overdevelopment of the space, leaving little remnant of the historic warehouse form.

We are also concerned about the windows. We would expect some form of historical analysis to understand the original form of the windows before they were illegally replaced with upvc. In order to achieve a heritage gain, new windows should reflect those that were historically present within the building.

HB&P recommend that the application is withdrawn until the heritage statement is revised to provide a full analysis of the existing structure and to ensure that the significance and impacts on the building fabric is fully considered in the scheme.

Policy: Chapter 16 of the NPPF (2023), particularly paragraph 205, that states: ‘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’.

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, in considering whether to grant listed building consent for any works the local planning authority 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.

Recommendation: Withdrawal and submission of a revised heritage study and impact assessment and amended plans and justification to address the above design and conservation concerns. HB&P would be happy to review the application again once the additional details are submitted. If this is not forthcoming, then the application should be refused on heritage grounds.

Regards

Ross Anthony

Case Work



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