



Historic England

SOUTH EAST OFFICE

Mr Stephen Harrison

Direct Dial: 01483 252015

Southampton City Council

Lower Ground Floor

Our ref: P00523434

Civic Centre

SOUTHAMPTON

SO14 7LS

22 September 2016

Dear Mr Harrison

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

BARGATE SHOPPING CENTRE, AND ADJOINING LAND IN QUEENSWAY, EAST STREET, HANOVER BUILDINGS, AND HIGH STREET, SOUTHAMPTON, SO14 1HF

Application No 16/01303/FUL

Thank you for your letter of 12 August 2016 notifying Historic England of the above application. We have undertaken pre-application discussions with the applicant regarding the potential impact to designated heritage assets from the proposed Bargate Shopping Centre re-development. We have now reviewed the information submitted by the applicant to support their planning application, and provide you with the following advice.

Summary

The development site lies within the north-east quarter of the medieval walled town of Southampton. The proposal area includes part of the Old Town North Conservation Area, and abuts the grade I listed and scheduled monuments of the Bargate and Town Wall north east section.



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We raise concerns regarding the height of buildings that form residential components of the proposed buildings, and also think that there are specific aspects of the application that require further development, including (not exclusively) landscaping of the area surrounding Polymond Tower which forms part of the Town Wall, and the linking of the Bargate and north east section of the walls.

We conclude that the development is harmful to designated heritage assets, but acknowledge that it also provides an opportunity to deliver heritage benefits, particularly in relation to the grade I listed buildings/scheduled monuments of the Town Wall north east and the Bargate. The harm identified relates specifically to the height of the proposed development, and this harm must be clearly and convincingly justified to satisfy the expectations of the National Planning Policy Framework, and both the heritage and other public benefits from the development shown to clearly outweigh the harm.

If the proposed height/quantum of development partly relates to the loss of value through the creation of the public realm which will benefit the adjacent scheduled monuments, a financial appraisal of the scheme will be critical in demonstrating the issue of viability. Should the appraisal demonstrate that the delivery of this scheme is dependent upon the amount of development proposed we would consider the proposal acceptable in heritage terms as the overall heritage benefits would outweigh the harm to heritage assets which would arise from the height of the new development. Equally should the viability report show that the scheme could be viable with less development we would recommend refusal as the harm to the heritage assets would not be justified and therefore the scheme would not comply with the requirements of the NPPF.

Historic England Advice

Significance and Impacts

Southampton Old Town

The development site lies within the north-east quarter of the medieval walled town of Southampton. Most of the medieval town is designated as conservation area (divided into Old Town North, Old Town West and Old Town South). The town of Southampton developed in this location from the Norman period. The town walls were extended and the fortifications enhanced throughout the 13th and 14th centuries and by 1381 the whole town was enclosed by walls. The Medieval street pattern is still evident within the town with the High Street being the principal route from north (The Bargate) to south (the Water Gate). A grid of narrow streets extended from the High Street to the walls. The Norman Castle occupied the north-west quarter of the town and to the south-west were the quays, wharfs and warehouses associated with the port activity of the waterfront. Significant Medieval remains survive within these areas as above and below ground archaeology. The extensive stretch of town walls is the outstanding feature of the old town conservation areas.



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The scale of development within the old town, generally 2-4 storeys, remained consistent throughout the 18th and 19th centuries as the town continued to develop and evolve (including a brief period as a spa town at the end of the 18th century). Buildings survive from the post Medieval period and therefore the historic character of the conservation areas is varied. Unfortunately the town was badly bombed during the Second World War and this led to hasty redevelopment in the post-war period which was of indifferent architectural quality. As a consequence some areas of the old walled town were considered to be of insufficient historic and architectural interest to merit inclusion within a conservation area. Nevertheless, as much of the area is designated as conservation area and other sections of wall are designated as scheduled monuments, it is appropriate to consider the walled town as a whole as a heritage asset, albeit not all of it designated.

The proposed height of this development means that there is potential for it to have a wider impact across the old town and for it to appear in key views of the Bargate or along the Town Walls, for example. This potential for impact further afield was identified in discussions with the applicant at the pre application stage and they were asked to explore this aspect of the scheme and provided the necessary material for this issue to be assessed. Unfortunately, despite this potential wider impact being raised the Heritage Statement does not address this aspect of the proposal. A Landscape and Visual Impact Assessment has been submitted with the proposal; this study addresses visual impact across the wider area but it is a pity that the findings of the LVIA were not integrated into the Heritage Statement to fully assess the impact on the *significance* of the conservation areas.

The theoretical zone of visual influence assessed in the LVIA encompasses the whole of the old walled town. A number of short, medium and long distance views have been assessed and the potential impact on these views depicted and described. Unfortunately the visual evidence is provided as the comparison of a 'before' photograph and an 'after' image which is a computer generated image. These images are not directly comparable which makes a detailed understanding of the visual impact of the development difficult. However, for the purposes of assessing the wider impact of the development across the walled town, the LVIA is of some assistance. Appreciation of impact can only be partially examined through fixed viewpoints so we have also visited the site to get a more general impression of potential impact.

Our conclusion is that this proposal would be evident in some views across the conservation areas of the old walled town (the more direct impact on the setting of the Bargate and the Town Walls is assessed separately). It would appear as a relatively minor but additional intrusion of modern development in the historic streetscape (see View 5 for example). Clearly the taller parts of the proposed development are those which are evident further afield. However, the built-up nature of the town, the general lack of long views within the walls and the already greatly altered townscape means



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that there would only be a minor adverse impact on the general character and appearance of the conservation areas. The main concern, however, is the contribution this development would make to the current general heightening of development in and around the old town (view 20 illustrates this) which results in either the loss of the scale and character of historic development within the old town (but outside of the conservation area) or a marked differential between the scale of development within the conservation area and that outside.

Old Town North Conservation Area

This proposal would result in the loss of the East Bargate Building which 'embraces' the Bargate and creates a public space on its east side. Built in the 1930's in a restrained neo Georgian style these buildings are not statutorily listed but are on the Southampton City Council 'local list' and they represent an important phase of city centre redevelopment between the wars when the use of the car was a prominent consideration in town planning. However, these buildings, although not unattractive have limited architectural interest, and they sever the visual link between the Bargate and the surviving north-east section of medieval Town Wall. This loss of connection undermines the significance of the Bargate, the scheduled north-east portion of wall and the circuit of the Town Wall as a whole.

Within the development site is another locally listed building which makes a positive contribution to the variety of architectural style and building date in the street scene and which is integral to the character of the conservation area. This is the former Burton building which has a simple art deco style frontage. This building would be retained and this is welcomed. In the same row as the Burton building (but outside of this site) is a grade II listed building (no. 6 High Street). This is a mid-19th century three-storey, three bay building with a stuccoed facade and sash windows. This development would have no impact on the significance of this building.

Central Parks Registered Park and Garden

Near to the development site, to the north-east, are the Southampton central parks, which are registered grade II*. These parks (the linked chain of West Park, East Park, Palmerston Park, Houndwell and Hoglands) have a rich time depth having been formed out of the former medieval open fields (Lammass Lands). However, their principal significance lies in the fact that they are an early example of municipal parks and were laid out in the late 1850's and early 1860's to provide important public green space in the heart of the developing city. The setting of the parks is urban and there are no key views of historic significance out of or into the park which would be affected by development on this site. Although the taller sections of the development would be visible from the park, and certainly the new development on the north end of the Queen's Way would be visible along Palmerston Road, this is not considered to be out of context and would not have an adverse impact on the significance of the registered park.



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Bargate and Town Wall north east (dual designated Scheduled Monuments and Listed Grade I Buildings)

The Bargate dates from c.1180, with alterations and restorations of c.1290, 18th and 19th centuries. It was built as a town gateway with Guildhall at first floor level. The Bargate originally formed a continuous element of the Town Walls, but was separated by breaches cut in the 1930's to allow traffic movement. The Bargate is deemed to be one of the finest town gateways in England and this is recognized in its Grade I and scheduled status. Collectively with the Town Walls it tells the story of the construction, evolution, and status of the Medieval old town, and it has great communal and aesthetic value as an iconic symbol of Southampton. The evidential value of the Town Walls and Bargate are also high, as their fabric holds information regarding construction techniques and materials of medieval and later phases of alteration. The north eastern element of the Town Wall to the east of Bargate is a significant section of wall due to the presence of three tower turrets, with Polymond Tower marking the corner point where the walls turned southwards. Consequently the wall here has great historical value in demonstrating the extent and scale of the medieval town.

One of our overriding concerns with the development during our discussions with the applicant has been the heights and massing of the proposed buildings in relation to the adjacent designated heritage assets of the Bargate and Town Wall north east, as the construction of tall buildings in close proximity to these monuments has the potential to cause harm through development within their setting. We acknowledge the height of buildings B and C within the Town Walls has dropped considerably from the initial proposal and this is welcomed. Despite this drop in height the new residential accommodation which sits above the retail units of buildings B and C would still be highly visible, as would the taller block on site D immediately outside the old town. It would be most visible when viewed in relation to the Town Wall when approaching the outside of the walls from the north and when moving east towards the north east section of the wall. The proposed building on site A is also a large building that would rise above the height of the Town Wall, though its height has been modified to ensure it is less dominant in relation to the Bargate.

Our own site visits, the general site sections, and the views analysis provided by the applicant, indicate the accommodation blocks B, C and D would be seen rising significantly above the wall when approaching from the north. There would also be clear visibility of the blocks when standing at the Bargate and approaching the walls from the west, or in the case of block A when approaching from both east and west along the line of the walls. It is our view that this is harmful to the adjacent heritage assets as it disrupts the aesthetic appreciation and historical understanding of the Town Walls and Bargate, which were designed to be impressive and dominant structures within their wider surroundings.

We recognise that the current setting of the north east part of the Town Walls is currently severely compromised by the disruption of its relationship with the Bargate



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caused by East Bargate Building, the presence of the Bargate Shopping Centre which is built in very close proximity to the south side of the wall and which looms above it, and the facing of service areas towards the wall.

When seen in close proximity to the wall and from within the newly proposed pedestrian garden street to the south of the wall, the design of the residential blocks stepping back from the retail level of B, C and D would ensure that the effect of taller buildings from this area would be minimised and that they would not loom disproportionately over the Town Wall at this point. The harm resulting from a tall building when in the immediate vicinity of the scheduled north east section of wall would therefore be significantly lower than when approaching the area from the north or west.

The proposals also aim to create new areas of garden street and café terraces along the south face of the Town Wall, which would provide better environs for the Town Walls and Bargate so that the adjacent monuments could be enjoyed and appreciated.

Additional specific comments on the application detail

Linking the Town Wall and Bargate

We think that the interpretation of the wall line between the Bargate and disconnected north-east part of the Town Wall is an essential part of the proposed scheme, and agree that this could be achieved through a combination of different landscaping changes. Lighting in particular would be an interesting way to create this link, but providing interpretation during daylight hours when lighting may be less obvious would be important. The current landscaping proposals follow the line of the wall but are low to the ground in the form of surface treatment and benches, and we suggest there may be scope to additionally interpret the wall line at a higher level through the addition of vertical features of lighting, art, sculpture, or street furniture.

Polymond Tower environs including proposed kiosks D and E

In our pre-application advice to the applicant we raised concerns regarding the introduction of double-storey kiosks to the east of Polymond Tower, along with points for consideration regarding landscaping in its immediate environs, but the applicant does not seem to have responded to these concerns in their planning proposals. This area of the Town Wall is significant as the Polymond Tower is aesthetically impressive, and the turning of the wall at this point demonstrates the design and sense of enclosure of the medieval town as created by the walls. It is currently poorly presented with a modern red brick wall and gate (both in poor structural condition) abutting the tower, an electric substation offset to one side, and the bins and service venting from buildings to the north of the wall, encroaching on any visitor experience of the north side of the wall and of Polymond Tower. Development proposals should seek to enhance this space by removing the brick wall and gate, and if possible re-locating the small substation away from the Tower. The proposed new enclosed space created with a gate against the tower and a new stretch of wall would be similar to the existing





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and would be detrimental to the aesthetic appreciation of the tower, whilst also creating the impression of a continuing east-west wall line on the outside of the enclosed town, which has never been the case. A more open garden area around the tower (rather than an enclosed courtyard), with boundaries set further north towards the existing buildings would create a sense of space around the tower where it could be appreciated 'in the round'.

Boundary treatments here may be best represented in materials that contrast with the stonework of the wall to avoid the impression of any continuing wall lines. They could be creative, for example using similar materials such as the laser cut metal screening proposed for balconies on building A, or drawing out other elements of the wider landscaping scheme. It is our view therefore that further consideration is required regarding how to landscape the area around Polymond Tower.

Your council may also wish to address the issues of service bin storage and the large extraction vent that currently faces onto the north side of Polymond Tower, removal of which is not proposed in the current scheme. It creates noise and odour which would not create suitable environs for relaxing and appreciating the wall and tower in any proposed new garden space.

In our early discussions with the applicant we understood that two small kiosks to the east of Polymond Tower were planned, and that in urban design terms these would help to mask the Hanover buildings and provide frontage to Queensway. The proposed double height of these kiosks (D and E) makes them large structures, and as such they are detrimental to the significance of the tower as a dominant feature of the Town Wall. Single-storey structures only would be justified in this location.

Proposed Kiosks A, B and C

In our discussions with the applicant we acknowledged that small kiosks would enhance the space between the Town Wall and new buildings to the south, by breaking up a large linear space and creating dwell areas. The 'lightness' of these kiosks through glazing would be one of the ways that they would enhance rather than impact negatively upon the Town Wall. The design drawings for kiosks B and C indicate a significant quantity of stone cladding, which although chosen to compliment the stone of the Town Wall, has the potential to create a more substantial and 'heavy' structure. If the cladding could be reduced and glazing increased we suggest this would lessen the visual impact of the kiosk structures in relation to the scheduled walls. We understand however that storage and refuse disposal areas may need to be incorporated within the footprint of the kiosks and need screening, to ensure there would be no large service bins etc. in the area surrounding the kiosks, dwell spaces, or Town Walls.

The lightness of kiosks also relies on having open outdoor spaces, and it is our view that enclosing the outdoor areas with railings, barriers, or signage, would again create





a more intrusive building rather than the light touch kiosks described during initial discussions.

Advertising signage on retail site B

The supporting design material indicates that on the site B retail frontages (Town Wall St and Squares) there would be a double-height frontage, with glazed entranceways on the lower half, and large images appropriate to the retailer (for example fashion images) above the entrances on the upper half. It is our view that this is inappropriate for retail spaces facing the scheduled walls, and has the potential to impact the adjacent monuments, by creating a cluttered and busy design in their setting rather than a streamlined frontage that will enhance the setting of the older elements surrounding the new buildings. We understood the proposed retail units would have double-height frontages, but that these would be glazed fully or faced in a suitable material and palette, and recommend consideration is given to how these may be designed to better enhance and react to the adjacent scheduled monuments.

Link bridges

The opening of the space between blocks C and D along the line of the former north-south part of the Town Wall, and along York Buildings route, is a clear benefit of the scheme, ensuring more of the town wall configuration and historic York Buildings route can be recognised and appreciated. At pre-application stage the proposed links between the buildings were to be light and glazed, but in the design drawings (general arrangement plans) there is an indication that the link crossing York route may be larger or bulkier. We recommend that your council clarifies the design of the links and ensures the proposals demonstrate they are light structures, to ensure that the permeability of the site, and enhanced setting and experience of the Town Walls, would not be compromised.

Site A building design

We think the detailing of the proposed balconies on building A, with their laser cut metal frontages, are creative and interesting, but have concerns over how these spaces might look once in use and occupied with the trappings of modern life. It is clear from observing other balcony areas in Southampton that they often gradually become cluttered with paraphernalia such as children's toys, push bikes, washing, and unkempt plants. All of these would detract greatly from the aesthetic appreciation and significance of the Bargate, Town Wall and Conservation Areas collectively, and your council may wish to consider removal of balconies on the elevations that face the Bargate and Town Wall.

Scheduled Monument Consent

Because there are significant proposed landscaping works that abut the scheduled Town Wall north east section and the Bargate, we note that Scheduled Monument Consent (SMC) would be required for the proposals; this is decided by the Secretary of State for DCMS, as advised and administered by Historic England. The design and





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implementation of such works would require careful consideration, and any SMC application would need to be supported with detailed design and construction drawings, and method statements. SMC would also be required for any protection measures such as boxing or shuttering, which may be needed during demolition or construction works. It would also be necessary to obtain SMC for any repair or conservation works to the Town Wall or Bargate (such as vegetation clearance or mortar repairs). We would be pleased to advise further on the requirements and process for SMC if required.

Heritage Benefits of the proposals

We acknowledge that the proposed development could deliver significant heritage benefits through improvement in the immediate environs of the north east area of the Town Wall and Bargate, particularly when experienced from within the walled town. This would primarily be achieved through demolition of the existing shopping centre buildings which are detrimental to the current appreciation of the Town Wall, and through an improved public realm which better reflects and tells the story of the medieval town, and which creates a distinctive sense of place. Retention of the former Burton Building would assist in demonstrating the evolution of the old town area during the 20th century.

The proposals show heritage benefits would also be achieved by opening up the eastern Wall line between buildings C and D enabling better connectivity and understanding of the walled town circuit. The creation of better definition of the line of missing elements of the Town Wall between the north east section of walls and Bargate, and the opening of the historic York Buildings route would also clearly be of benefit, enabling people to follow historic routeways through the space created. The setting-back of the new development from the Town Wall, and creation of open space and landscape garden areas to the south of the walls and around Polymond Tower, would be a significant element of the proposed scheme that would allow the public to better appreciate and enjoy a section of the wall which has been hidden away in an unattractive and unwelcoming back yard area. The kiosks and garden areas could provide the chance for people to dwell by the walls and appreciate the role they have played in defining the evolving old town. Collectively these changes could enhance the aesthetic and communal value of the scheduled monuments, compared to how they are understood and appreciated at present.

It is clear that the Bargate and Town Walls would become a focal point for this area of Southampton if the development proposals go ahead. People would be enjoying the space around, and interacting with, the heritage assets in this area in a way that is not currently possible, particularly with respect to the north east Town Wall. The Bargate has recently undergone a series of conservation works to prevent water ingress from the roof and allow the saturated walls to gradually dry out. There will however be a need for further repairs to the gate in due course. The north east section of the Town Wall is currently in need of maintenance, with Buddleia and other woody growth taking



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root along the top of the wall, presumably in voids that have soil build up and require re-pointing. In order for the wall and its towers to provide a strong backdrop for any new landscaping and design in this area, conservation works will be required. Securing such repairs would be essential for preserving the evidential, historical, and aesthetic value of the monuments, and your council will need to consider how this could be achieved as part of, or in relation to, the proposed scheme.

In our pre-application discussions with the applicant the provision of heritage interpretation panels was discussed for key areas of the development site, for example the location of the former north-south wall between blocks C and D. We cannot see this included in the application proposals, but consider that the implementation of interpretation panels or similar would be a positive addition to the scheme, and encourage this element to be explored further by your local authority.

We also note that there is an opportunity for heritage benefit to be delivered through the further investigation and publication of previous archaeological excavation works on the Bargate site, and this could be undertaken in conjunction with any new post-excavation and publication work required for the proposed scheme.

Policy and Historic England position

National Policy

The application affects a range of designated heritage assets including three conservation areas, and grade I listed buildings that are also scheduled monuments. With regard to the conservation areas there is a statutory requirement to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas (s.72, 1990 Act) and this must be taken into account by your authority when making its decision. As the application also affects designated scheduled monuments/grade I listed buildings the statutory requirement to have special regard to the desirability of preserving these assets, their setting and any features of special interest (ss.16, 62, 1990 Act) must be taken into account by your authority when making its decision.

Under the NPPF it is a core planning principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). 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. No other planning concern is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be - grade I listed buildings and scheduled monuments are of the highest graded nationally designated heritage assets. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (para.132 NPPF). The onus is therefore on your



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authority to rigorously test the necessity of any harmful works.

Your authority should also aim to achieve sustainable development, seeking economic, social and environmental gains jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions (para.8 NPPF). Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment (para.9 NPPF). Your authority should therefore also seek to ensure proposals avoid or minimise harm to the significance of designated heritage assets.

Your authority should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (para.139 NPPF).

If a proposal cannot be amended to avoid all harm, then if the proposal would 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 (para.132, NPPF).

Local Policy

The height of this development is especially pertinent because the adopted policy position of the local planning authority, as set out in the *Southampton City Centre Urban Design Strategy* and the *Southampton Old Town Development Strategy*, is that building heights in the old town should be generally kept down. We endorse this intention as it seeks to reinforce the Medieval townscape character and respect the setting of the town walls. The issue of building height is especially relevant on this site because of the close proximity of the Town Walls. In the Old Town Development Strategy building heights of 3-5 storeys are advocated but in the north east area of the old town, which includes this site, 3-4 storeys are suggested as appropriate. A substantial building with a range of heights of up to 9 storeys is therefore clearly contrary to local planning policy.

Historic England Position

We have undertaken detailed pre-application discussion with the applicants to encourage them to minimise harm to designated heritage assets from the development proposals. We have carefully considered the information submitted for the planning application and conclude that the development is harmful to designated heritage assets, but acknowledge that it also provides an opportunity to deliver heritage benefits, particularly in relation to the dual-designated grade I listed buildings/scheduled monuments of the Town Wall north east and the Bargate.

We consider that on balance the greatly changed urban context of the old town means that the level of harm to the conservation areas arising from the height of the development is acceptable. The development would however contribute to the current





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general heightening of development in and around the old town which results in either the loss of the scale and character of historic development within the old town (but outside of the conservation area) or a marked differential between the scale of development within the conservation area and that outside.

The harm to the designated heritage assets of the Town Walls and Bargate would be much greater; though on balance we do not deem the proposals to cause substantial harm, we would judge the level of harm to be high. This is because we think that tall buildings in this area would disrupt the aesthetic appreciation and historical understanding of the Town Walls and Bargate, which were designed to be impressive and dominant structures within their wider surroundings. The harm to designated heritage assets arising from the height of this development must therefore be clearly and convincingly justified to satisfy the expectations of the National Planning Policy Framework, and both the heritage and other public benefits from the development have to be shown to clearly outweigh the harm.

It is our understanding that the proposed height/quantum of development relates partly to the loss of value through the creation of the public realm, which would better respect the setting of the Town Wall and the Bargate. A financial appraisal of the scheme will therefore be critical in demonstrating the issue of viability. We note that a viability statement has been submitted as part of the planning application, and understand that it is the council's intention to appoint an independent specialist to undertake a review of the viability of the proposed scheme. We would like to see this review upon completion, and also offer our assistance in assessing the viability of the scheme, if required.

Recommendation

For the reasons given above, we urge you to address the above issues so as to further refine the proposed development scheme. We recognise that the proposed re-development of the Bargate Shopping Centre offers a great opportunity to deliver significant heritage and public benefits by improving the setting of the grade I listed buildings/scheduled monuments of the Town Wall north east and the Bargate, the settings of which are currently severely compromised, particularly that of the Town Wall.

If the applicant is able to demonstrate through their financial appraisal that the viability of the proposed scheme is dependent upon the amount of development proposed, we would consider the proposal acceptable in heritage terms as the overall heritage benefits would outweigh the harm to heritage assets which would arise from the height of the new development.

Equally should the viability report show that the scheme could be viable with less development, we would recommend refusal as the harm to the heritage assets originating from the height of the development would not be justified and therefore the



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scheme would not comply with the requirements of the NPPF.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

Rebecca Lambert

Inspector/Assistant Inspector of Ancient Monuments

E-mail: rebecca.lambert@HistoricEngland.org.uk



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