

**Conservation Officer Comments**  
**Amended Plans or Further Details**

<b>Application Number:</b>	AWDM/0524/25 and AWDM/0525/25
<b>Location:</b>	11 Montague Place
<b>Proposal:</b>	Listed Building Consent for new shopfront and internal alterations including removal of section of fourth floor, new walls and demolition of walls for new doors (in conjunction with the partial change of use to residential)
<b>Case Officer:</b>	<b>Mrs J Fox</b>

	Further Information Required
	Design Review Required
	No objection - no harm
	No objection - harm is negligible or mitigated
✓	Objection - less than substantial harm
	Objection - substantial harm
	Objection – Total Loss

<b>Site and Surroundings:</b>	<p>Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant listed building consent, to have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.</p> <p>Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when considering whether to grant planning permission, to 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.”</p> <p>Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 confers a statutory duty to LPAs when exercising planning functions, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.”</p> <p>The LPA’s duties are reinforced within Section 16 of the NPPF, Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.</p> <p>As such, 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.</p>
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	<p>Other elements held within Section 16 will also be considered as will Local Policy.</p> <p>11 Montague Place is part of an early 19<sup>th</sup> century terrace designed in the classical style and built over 5 storeys. The ground floor has been subject to significant alterations to form a ground floor commercial shop unit the extends to upper floors of the building.</p>
<p><b>Drawing Errors:</b></p>	
<p><b>Comments:</b></p>	<p>The proposal seeks listed building consent to carry out a number of alterations relating to the formation of 4 flats and a commercial unit from the existing solely commercial use.</p> <p>It is noted that some details regarding secondary glazing systems have been supplied but as per historic England advice note 16 secondary glazing systems do not require LBC and as such no comment shall be made in respect of this.</p> <p>Whereas it is acknowledged that the town centre location and size of the building does indeed lend itself to conversion there are a number of issues that require revision. In terms of the external appearance and the new use, this gives rise to an opportunity to reinstate a more historically accurate residential entrance in place of the window that is proposed to be removed. There appears to be no reason why the residential entrance could not form a curved access way with rising steps to the Piano Nobel level as seen on the neighbouring no12, further historical research could confirm appearance. The proposed doorway arrangement is neither suitable nor of an appropriate architectural design or quality and as such requires considerable revision.</p> <p>In terms of the general principle, it is noted during the site visit that some fire breaks were present in the stairwell as was a hardwired fire alarm system, however it is not clear as to the extent of sound proofing, fire proofing (including fire doors and enclosures) and other similar works would be required as part of the conversion, these would have potential impacts upon historic and architectural interest. How will ceilings be retained? What materials would be used?</p> <p>Although some areas have already been subjected to alteration the proposal appears to not make use of these apertures and simply create new ones, further encouraging loss of plan form and legibility. Original doors appear to be present as does some architrave. It is accepted that the doors have been over boarded but will these be retained or removed and replaced?</p> <p>The removal of the top floor structure to create and open void down to the accommodation below is not acceptable not least as it would result in a loss of lateral restraint and most likely lead to the widespread failure of the roof structure. Further to this it would also result in a redundant door and window, serving no room as such, and be wholly unjustified.</p>

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	<p>It is accepted that a form of commercial and residential mixed use is probably the most viable outcome for the building, however the design should be reviewed to ensure it responds to the buildings historic and architectural interest. Whereas it is agreed that much of the buildings architectural interest is based upon its external aesthetic that is not to say that the internal aspects of the building are of no value, this is where the scheme does not adequately justify the works proposed, nor are the works proposed sufficiently detailed to identify all potential impacts. Can a revised scheme reveal or reinstate historic and architectural interest? Are we keeping doors? Are we keeping or reinstating ceilings? Would a lower density development allow for a more sympathetic result? The Act does not differentiate between internal and external and as such a thorough assessment and informed proposal is required.</p> <p>At this stage it is suggested that the applicant thoroughly revise the scheme to address the points of concern raised above.</p>
<p><b>Further comment:</b></p>	<p>The revisions submitted have made good progress towards an acceptable scheme in relation to heritage matters.</p> <p>However, the schedule of retained historic fabric contains too many 'ifs and maybes', largely due to no fire strategy being set out and thus not being fully aware of what can be retained and what will require containment or indeed replacement. This has a direct impact on the heritage values of the building. For example the fire requirements for the proposed may involve the loss of a historic door, but many doors are quite thin, so can a like for like realistically be achieved? Can those doors be retained with a revised approach providing a strategy of strong early warning or indeed suppression to avoid the need to lose historic doors and other materials. Would a decrease in the number of units proposed provide any form of advantage?</p> <p>As previously detailed the proposal presents good potential for an ongoing viable use for the Grade II Listed building and as such the principle is supportable. But the scheme doesn't hold sufficient information, that the council could provide a consent that would ultimately allow works to proceed. To do so would involve a considerable number of pre-commencement conditions or further applications at a later date. This would result in no progress in the short to medium term.</p> <p>Turning to other points, the revised door entrance is supportable but the detail drawing is not of sufficient detail or appropriate scale. 1:2 sections and 1:10 elevations of the door and fanlight (separately) will be required and a 1:5 section of the door entrance and steps etc. The submitted section of the door for example shows the door to be one continuous piece of wood, no horizontal section has been supplied either, this is not sufficiently accurate. Details of finishes, and surrounding architrave, door frame mouldings should also be included.</p>

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	<p>In summary it is suggested:</p> <ul style="list-style-type: none"><li>• the application is reviewed by a qualified fire safety professional so a clear fire strategy can be developed, this will allow the LBC application to accurately take into account any fire prevention actions or modifications required without speculation.</li><li>• The drawings are fully reflective of what is proposed with the main entrance details updated as detailed above.</li></ul>
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Simon Richard  
Conservation Consultant  
Date of Comment 15/1/26