

Heritage Statement

**Land at Queen's Parade and York Place,
Bristol BS1 5XJ**

For

Snap Investments Ltd.



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EXECUTIVE SUMMARY

1. This independent heritage statement provides an assessment of the significance of built heritage in the environs of the application site at Queen's Parade, Bristol BS1 5XJ, and of the impact of the submitted development proposal on that significance. The statement has been commissioned by SNAP Investments Ltd to inform the development of proposals for the site and to form part of the planning submission for the project.
2. The statement should be read in conjunction with the scheme's design and access statement prepared by Angus Meek Architects and a desk-based archaeological assessment prepared by Bristol & Bath Heritage Consultancy Ltd. The development proposals are described in detail in the design and access statement and the submission drawings.
3. The application site stands on the corner of Queen's Parade and York Place, at the base of the slope of Brandon Hill and just within the southern boundary of Park Street and Brandon Hill Conservation Area. In tracing the history of the site, the statement finds that nos.1-14 Queen's Parade, a Grade II listed terrace adjoining the site, was built at the zenith of Bristol's mid-Georgian building boom between 1786 and the end of January 1793. During construction over those years, the design of the terrace morphed somewhat from original intentions. The terrace was almost complete when economic crisis brought construction in the city to a sudden catastrophic halt in February 1793. The planned continuation of the terrace across today's application site was stalled and never came to fruition. The development of housing along York Place – an integral part of the original plan - was held back by around 15 years. The application site remained largely open for another eighty years. From 1890, first religious and then educational use have dictated the nature and size of built form on the site, until its eventual redundancy for school use in 2021.
4. The statement explores potential built heritage receptors of impacts from the submission's development proposals, considering a range of listed buildings in the immediate environs of the site, the presence on site of a locally listed former chapel as well as its distinctive perimeter boundary wall along the Queen's Parade and York Place frontages, and the Conservation Area with its panoramic and long views from and to the slope of Brandon Hill. In total, the statement identifies fourteen potential built heritage receptors of impacts from the development proposals.
5. After considering relevant legislation and national and local heritage policy, a detailed assessment is made of the potential for the development proposals to affect the significance of the various receptor assets, including the Conservation Area. The statement's impact assessment finds that minor less than substantial harm will be caused by the development proposals to the high significance of the designated Park Street and Brandon Hill Conservation Area, while moderate less than substantial harm will result to the low significance of the potentially non-designated perimeter boundary wall around the site.

6. The wider public benefits that will be delivered by the proposals within this application are considered as part of the planning balance within the Planning Statement accompanying the submission. However, it is important in closing to stress both that considerable weight must be accorded to any harm likely to be caused to designated heritage assets and that 'the provision of...open-market houses and the associated economic activity are very weighty matters in economic and social terms', as case law has previously noted. In this instance, the statement highlights that reuse of the application site including the non-designated former Mission chapel is an important objective that secures both the latter's long term conservation and ongoing protection of the character of the Park Street and Brandon Hill Conservation Area.

1 INTRODUCTION

1.1 Purpose of statement

This independent heritage statement provides an assessment of the significance of built and/or cultural heritage in the environs of the application site at Queen's Parade, Bristol BS1 5XJ [Figure 1], and of the impact of the submitted development proposal on that significance. The statement has been commissioned by SNAP Investments Ltd, owner of the property, to inform the development of proposals for the site and to form part of the planning submission for the project. The statement covers built and/or cultural heritage. It should be read in conjunction with the scheme's design and access statement [DAS] prepared by Angus Meek Architects and a desk-based archaeological assessment [DBA] prepared by Bristol & Bath Heritage Consultancy Ltd at the same time as the heritage statement and working in association with Heritage Places.

The planning submission relates to the proposed development of 9no. residential apartments and 3no. commercial units at the site of the former St George's Church of England Primary School, on the corner of Queen's Parade and York Place, Bristol, designed by Angus Meek Architects. The site is located at the base of the south east facing slope of Brandon Hill, roughly 300 m due west of Bristol Cathedral. It lies close within the south eastern boundary of the designated Park Street and Brandon Hill Conservation Area.

The National Planning Policy Framework [NPPF], which since 2012 has incorporated the Government's heritage policy and is now in a fourth edition (published in July 2021), recognises that the historic environment is an irreplaceable resource whose fragile and finite nature is a particularly important consideration in planning. The Historic Environment Good Practice Advice in Planning: 2 (entitled 'Managing Significance in Decision-Taking in the Historic Environment' and published in July 2015), states:

'Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.' [HEGPA 2, paragraph 4]

It also notes in introduction that:

'...the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance' [HEGPA 2, paragraph 3]

The Good Practice Advice advocates a logical step-by-step approach to dealing with heritage assets during the planning and design of development and subsequently in making a planning application – namely:

- *'Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*
- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change.*
- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.'* HEGPA 2, paragraph 6]

This heritage statement has been prepared to fulfill this brief established by the NPPF and the Historic Environment Good Practice Advice in Planning: 2. It has also been prepared to accord with guidance set out in Historic England's 2019 Advice Note 12 'Statements of Heritage Significance: Analysing Significance in Heritage Assets'.

1.2 Methodology and sources of information

This statement has been based on:

- Site visits carried out by the author to the site and its wider environs in late 2022 and early 2023;
- Bristol Historic Environment Record (BHER);
- National Monuments Record (NMR);
- The archives at Bristol Record Office (BRO) and any other relevant County Record Offices;
- The Brakenridge Collection of historic water colours and other illustrations held at Bristol Museum;
- The Historic England Archive (HEA);
- Data held by Historic England on designated heritage assets in the National heritage List for England (NHLE);
- Information held within local studies libraries, where appropriate;
- Inspection of geotechnical or site investigation records available for the site;
- Inspection of aerial photographs held by Historic England and other archives;
- Diverse published and unpublished evaluations of the local area and its historical associations;
- Historical documents available online;
- Other website information, including local newspapers and census information from www.findmypast.com and material from a range of record sources made available on Bristol City Council's Know Your Place website, at www.heritagegateway.org.uk, and from Historic England's National Heritage List for England;
- Various other online repositories;
- Historical maps and plans of the locality;
- Examination of national and local policy documents and other relevant material produced by Historic England and Bristol City Council, including the latter's May 2011 Conservation

Area 10: Park Street and Brandon Hill Character Appraisal and Management Proposals
[CACAMP].

2 GENERAL BACKGROUND, DEVELOPMENT HISTORY, AND ANALYSIS OF THE APPLICATION SITE AND ITS WIDER ENVIRONS

2.1 Location and description

The application site [NGR: ST 58035 72700; Figures 1, 2, 3] stands on the east side of the junction between Queen's Parade and York Place and at the base of Brandon Hill, approximately 300m due west of Bristol Cathedral and College Green. Queen's Parade at this point runs from the north east to south west. As noted already, the site lies inside the south eastern boundary of the Park Street and Brandon Hill Conservation Area. Part of the north east boundary of the site abuts the Grade II listed terrace of nos.1-14 Queen's Parade. Across York Place, nos.3-7 York Place and 15 Queen's Parade form another Grade II listed building, as do nos.8-11 York Place, which adjoin the site to its south. Within the site itself, a former Mission Chapel standing close to the boundary wall along York Place is entered on the Bristol Local List as a non-designated heritage asset.



FIGURE 1: REDLINE BOUNDARY FOR THE APPLICATION SITE (©ANGUS MEEK ARCHITECTS)



FIGURE 2: LOOKING EAST FROM THE BASE OF BRANDON HILL ACROSS THE LARGELY OPEN APPLICATION SITE WITH THE LISTED TERRACE OF NOS 1-14 QUEEN'S PARADE BEYOND



FIGURE 3: AS (2), BUT LOOKING SOUTH EAST OVER THE SITE AND DOWN YORK PLACE

The site is currently redundant. In the late 19th century, the then still largely open plot (of the same configuration as today) had been developed with the construction of a mission chapel originally known as the Church of the Good Shepherd, which had an open yard to its north. Subsequently, the chapel building and site were taken over and used as part of the premises of St George's Church of England Primary School. The school closed in August 2021 resulting in the site's redundancy and sale for redevelopment. The site also contains a long narrow two storeyed school room built along its north eastern boundary against no.14 Queen's Parade.

The site lies at a markedly lower level to Queen's Parade and is essentially level [Figure 4], having been terraced into the slope of Brandon Hill during the laying out and construction of Queen's Parade, its principal residential terrace, and York Place. The site's boundary with Queen's Parade and York Place is defined by a stone wall built of local Brandon Hill Grit and sandstone and capped in red brickwork. Due to the terracing, the perimeter wall along the north west Queen's Parade boundary comprises a tall retaining wall, but generally the boundary wall along the road frontages of Queen's Parade and York Place is approximately 1800mm high. Access to the site is gained by way of a gate off York Place through the boundary wall just to the north of the former chapel building. A blocked historic pedestrian entrance through the Queen's Parade stretch of the boundary wall, where it abuts the corner of no.14 Queen's Parade, once opened on to steps leading down to the site at lower level. A further blocked pedestrian entrance lies at the southern end of the site off York Place.



FIGURE 4: VIEW DOWN INTO THE FORMER SCHOOL YARD OVER THE SITE'S BOUNDARY ON QUEEN'S PARADE

The underlying bedrock geology of the site is shown on British Geological Society mapping as being Quartzitic Sandstone Formation sandstone, a sedimentary bedrock comprising hard pale grey quartzitic sandstones and grey mudstones.

2.2 Historical development of the application site and its surrounding area

2.2.1 Introduction

The previously mentioned DBA prepared by BBHC sets out detailed findings on the development of the application site and its immediate environs. It is not intended to repeat that history in this section of the heritage statement. Accordingly, this section picks up on, explores, and examines the implications of key parts of that history in order to establish a sound understanding of the local built historic environment and its significance. That is as the NPPF demands.

2.2.2 Expansion and discussion of development history

Nos.1-14 Queen's Parade

The DAB has explained that, in the first quarter of the 18th century, the application site and the land immediately to its east - now built on with the listed terrace known as 1-14 Queen's Parade - were in the possession of the Dean and Chapter of Bristol Cathedral. At that time, Queen's Parade and York Place were not in existence as roads (although there may have been a path of sorts roughly where Queen's Parade now runs), so the largely undeveloped slope of Brandon Hill continued down to Limekiln Lane (see DBA Fig.13).

At some time prior to 1772, the Corporation of Bristol had obtained an interest in this land, as in August of that year it granted a lease to a John Wadham, a glazier, of *'the messuage or tenements and premises...at the foot of Brandon Hill...in a street...called Cow Lane or otherwise Limekiln Lane'* for a term of ninety-nine years (BRO ref. 1646/13).

As an aside, it is important to note before going further that, while the development history of the listed terrace on Queen's Parade is intimately tied to John Wadham, the dates of various pieces of documentation (starting with the 1772 lease) indicate there must have been two, not one, of this name – presumably father and son. Unusually, despite considerable efforts, during the course of preparation of this heritage statement, it has not been possible to separate out the involvement in the development history of John Wadham senior and junior with absolute certainty in all instances. Accordingly, where uncertainty remains, the name 'John Wadham' has been applied without clarification by use of senior (snr) and junior (jnr) of which was involved. What can be said is that both John Wadham snr and jnr were glaziers by profession, although the term glass manufacturers would be more accurate in today's terminology. Wadham snr died in 1797; Wadham jnr was born in 1762 and died in 1843. One – most probably John Wadham snr - played a central role in Bristol's significant manufacturing of colourless 18th century flint glass, principally utilised for tableware. In August 1789, Wadham, Ricketts & Co (subsequently Wadham, Fry, Ricketts & Co) either opened or took management control of the important Phoenix Glass Works at Temple Gate. As will be mentioned again later, John Wadham sold his stake in the firm in January 1795.

Prior to the Corporation granting John Wadham a further lease on land known as Bradford's Garden at the eastern end of today's Queen's Parade in May 1786 (by which time, John Wadham snr was

undoubtedly well into his 40s and John Wadham jnr was 24), a plan was drawn up (presumably by Wadham and seemingly in 1784 or 1785) for comprehensive development of the land demised in the two leases, with new roads (then unnamed, but to be York Place and Queen's Parade), a passageway (today Brandon Steps, but previously known as Devil's Alley), and residential properties [Figure 5]. The Corporation's May 1786 lease to Wadham (not illustrated) was fundamental to this development, for it anticipated the demolition of a summer house on the northern edge of Bradford's Garden (that is, at the foot of Brandon Hill), with the ground to be kept open thereafter until being incorporated into a new public street (Queen's Parade).



FIGURE 5: 1784/85 PLAN OF THE PROPOSED DEVELOPMENT OF LAND LEASED BY JOHN WADHAM (©BRISTOL ARCHIVES REF. TC/ADM/BOX/36/16)

The 1784 proposed plan (other aspects of which are discussed in the DBA) shows York Place as being developed to a width of 20 feet, while the future Queen's Parade is shown as being only 10 feet wide. York Place was to be developed with full terraces of 10 houses on both sides, set back from the highway behind small front gardens, while the Queen's Parade terrace, comprising 13 markedly larger/deeper houses facing on to Brandon Hill, was to be built hard against the highway, with gardens to the rear. The meeting between the terrace on the east side of York Place and that on Queen's Parade - inevitably, a design challenge due to the considerable slope of the land from north to south - was planned to give precedence to the smaller and lower York Place housing and associated front gardens, so that the Queen's Parade terrace stopped short, presumably (at least, notionally) on the eastern boundary of the current application site.

Wadham's development of the Queen's Parade terrace seems to have commenced reasonably rapidly, for by October 1787, less than 18 months after taking the further lease on the land, he was insuring the first completed house (no.12 Queen's Parade, which he appears to have taken as his own residence) with the local Sun Fire Office (LMA ref. MS 11936/347/536617). The following February, a

sub-lessee Edward Rosser, a mason and builder, insured no.8 with the Sun Fire Office – again, for himself - and, after that, Richard Blanch, a boat builder, insured no.9 (April 1789) and Thomas Stevens, a carpenter, no.6 (July 1789), both as tenanted properties. All evidence points to these house numbers being the same as today. Construction of the terrace commenced with no.12 (not today's western end of the terrace, which is no.14) and moved eastwards towards no.1. The identity of the architect/builder responsible for the design and construction of the terrace is not specifically recorded in contemporary documentation, but it was almost certainly Edward Rosser, who, as noted already, had taken the lease of no.8 early on and who was a signatory along with Wadham and Stevens (the developers) to legal documents relating to a dispute with the Corporation over encroachments in July 1791 (BRO ref.821(2)a).

Something of the complex construction process can be gleaned by consideration of aerial photographs taken in 1921 and 1946 [Figures 6, 7]. The first task involved major groundworks, with the excavation/quarrying of the base of the slope of Brandon Hill to create a flat 'plateau' for construction that extended from the proposed line of Brandon Steps/Devil's Alley in the east to that of the future York Place in the west. The plateau seems to have extended out over the rear gardens, too. Most probably, the majority of cellar spaces that underlie the new road were hewn out at the same time, before Queen's Parade was created at ground level. It is assumed that the large quantities of Brandon Hill Grit stone extracted in the quarrying and levelling process were used for the boundary walls and the retaining wall on the north and west sides of the current application site.

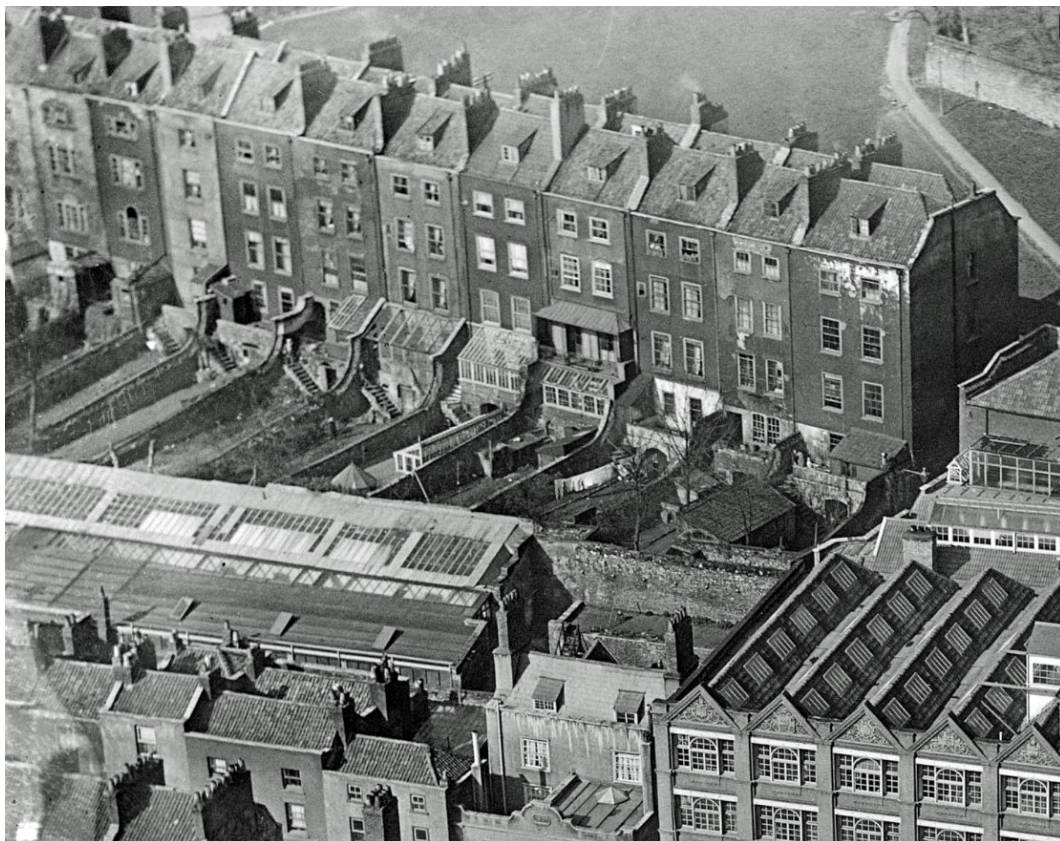


FIGURE 6: AERIAL IMAGE OF Nos 1-14 QUEEN'S PARADE TAKEN IN MARCH 1921 (©HISTORIC ENGLAND – EAW005452)



FIGURE 7: AERIAL IMAGE OF SITE AND WESTERN END OF QUEEN'S PARADE TERRACE TAKEN IN MAY 1946 (©HISTORIC ENGLAND – EAW000698)

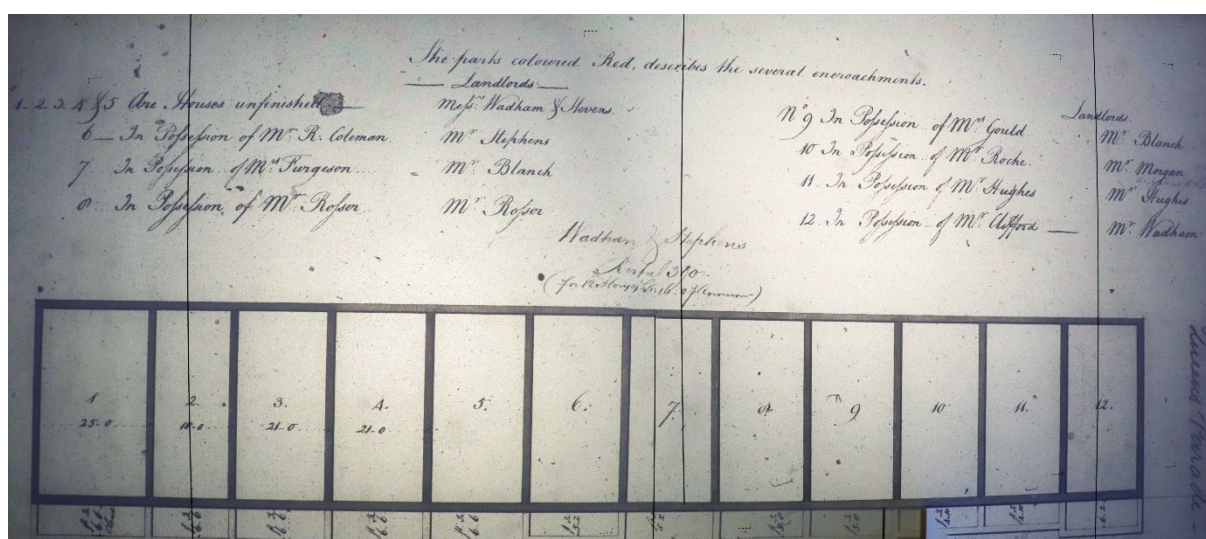


FIGURE 8: 1791 PLAN OF THE TERRACE IN CONSTRUCTION BY WILLIAM PATY (©BRISTOL ARCHIVES REF. PLAN BOOK B, FOLIO 91)

As the DBA has explained, a plan prepared by William Paty as City Surveyor for the Corporation of Bristol on 2nd March 1791 [Figure 8], demonstrates that at that time nos.6-12 Queen's Parade were complete and occupied. Nos.1-5 were recorded on the plan as 'unfinished', but examination of its

detail suggests they were actually unbuilt above ground level. The plan confirms that by then John Wadham had taken Thomas Stevens as his development partner in the venture. Paty's plan appears to have been commissioned to identify and place a rental value on basement encroachments for coal chutes made by the developers below the public road beyond the building limits permitted in Wadham's lease and it resulted in a further lease – to Wadham and Stevens together – in January 1793 [Figure 9].

William Paty's 1791 plan of the then twelve houses in the terrace can be tied together with physical evidence visible today in the main terrace façade in order to understand the changing concept for Queen's Parade. To recap, the evidence of the plan is that 12 houses were either completed or under construction in March 1791, but 'unfinished'. However, physical evidence visible in the terrace points to there being a rather different intention from the outset in the minds of the developer and architect/builder. Although the design was not as refined as that for some houses being built contemporaneously (for instance, those by William Paty himself at Park Place in Clifton), there are irrefutable signs of an attempt to make the terrace an unified 'palatial' composition from the very beginning, with designed emphasis on its centre and ends. Centrally, nos.7 and 8 were of 3 bay width (unlike nos. 2-6 and 9-12, which were of two bays) and, at the eastern end, no.1 was built both of 3 bays and with a building line projecting slightly forward for greater emphasis.

Had the terrace been designed and built as one, there seems little doubt that no.14 would have replicated these same characteristics from no.1 so as to create a palatial symmetrical front. However, as we have seen, Paty's plan shows that, as at March 1791, nos.13 and 14 neither existed nor were acknowledged as forming part of Wadham and Stevens' design intent (or even perhaps part of their agreement with the Corporation). That notwithstanding, it was undoubtedly part of their original concept, for in order for the wider nos.7 and 8 to be at the centre of the row, it had to comprise 14, not 12, houses.

If that was the case, if a terrace length of 14 houses was fundamental to its underlying design concept, why were only nos 1-12 being built in March 1791? While there is no conclusive proof, Walter Ison provides a likely explanation in his 1952 book, 'The Georgian Houses of Bristol'. Writing about the 18th century development of Bishop's Park, which included Queen's Parade, he remarked on the local practice of establishing temporary builder's yards, scattered around the neighbourhood as close as possible to the individual construction sites for new housing. Given the extent of land leased by John Wadham from the Corporation when construction started in 1786, it would have made eminent sense for his builder to begin building the terrace at no.12, separating off the future site of nos.13 and 14 for his temporary yard and only returning to construct those final two houses once nos.12 to 1 had been completed.

At some time between March 1791 and late 1792, Rosser (assuming he was the builder employed by Wadham and Stevens) commenced construction of nos.13 and 14 Queen's Parade. A key consideration for this heritage statement is understanding the clues (in the form of 'fossil' evidence) that survive in the visible external fabric of the terrace that point to its history and form part of the character and significance of the listed building, as is required by Paragraph 194 of the NPPF (see also section 3.2.1 of this statement). As has been noted above, the terrace appears to have been designed at the outset as a 'palatial' (that is, whole terrace) composition that would have 3 bay projecting ends

(of one house width) and a grander central block of two houses. In the event, whether due to the staggered phasing of its construction or the portent of a brewing economic crisis that overshadowed this final phase of its construction, all finesse and original intent seem to have been stripped from building work undertaken after Paty's 1791 plan was prepared. When nos.13 and 14 came to be started, they were of matching 2 bay basic form, with no additional emphasis being provided to no.14 through an extra bay's width or a projecting building line. Instead, simple pilasters were added to the main elevation of both houses on the line of the party walls between nos.12/13, 13/14 and at the very end of the terrace. Only one other pilaster appears on the principal elevation along the whole terrace – curiously and inexplicably asymmetrically-placed on the party wall between nos.8 and 9. Setting that last detailing quirk aside, as a result of an accident of history and/or economic circumstance, the proposed character and appearance of the listed terrace came to be disrupted at its western end.

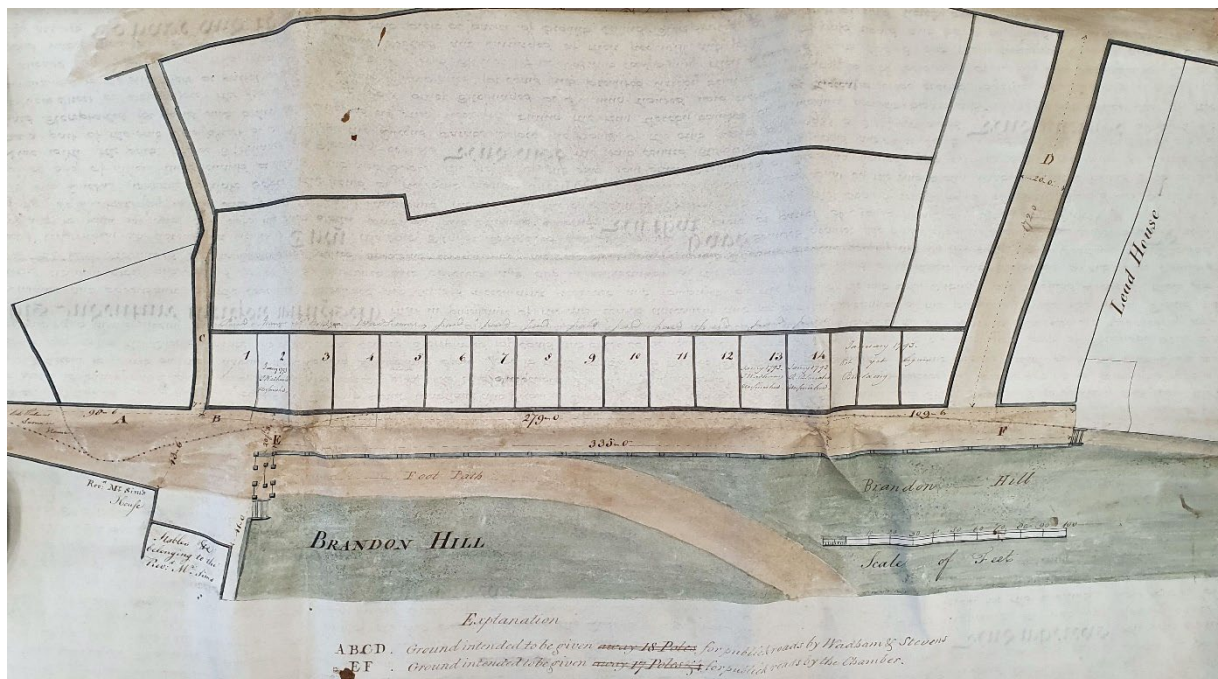


FIGURE 9: DETAIL OF JANUARY 1793 LEASE PLAN SHOWING CONSTRUCTION PROGRESS AT THAT DATE (@BRISTOL ARCHIVES REF.821(2)C)

Reference has already been made above to a further lease by the Corporation of Bristol to John Wadham and Thomas Stevens as developers in January 1793. That lease is a large document and its state regrettably prevents comprehensive reading and analysis. That nonetheless, it contains a plan [Figure 9] that is extremely useful in furthering our understanding of the development of both Queen's Parade and the current application site to which this statement relates. The plan tells us that, at the start of 1793, nos.13 and 14 at the westernmost end of the terrace were in construction, but remained unfinished. At the other end of the terrace, no.2 also remained incomplete. The lease and its plan reveal that Queen's Parade and York Place (still not named, apparently) were being created on land partly donated by the Corporation and partly hewn out of Wadham and Steven's own leased land. The developers were responsible for laying out and forming Queen's Parade as a street as far westwards as the rear of the intended future houses on the west side of York Place. The boundary of the land leased by Wadham and Stevens from the Corporation ran down the eastern side of the leadhouse (see also Figure 5) to include both sides of the future York Place, along the edge of Limekiln Lane, up the

east side of Brandon Steps/Devil's Alley (see above discussion on the 1784/85 plan) and east of its line to include the remnants of Bradford's Garden, before returning along the north side of Queen's Parade. Most interestingly perhaps, for the first time the plan shows the Queen's Parade terrace as being planned to extend across the application site to the corner with York Place, with three further houses to the west of no.14 being annotated on the plan as *'January 1793. Not yet begun Building'*.

On 1st February 1793, following rapidly on the heels of the trial and execution of Louis XVI, the French First Republic declared war on Great Britain and the Dutch Republic. According to the Annual Register, whose views reflected those of the British government:

'Thus, after a ten years peace, during which she had recovered from the wounds inflicted upon her in the unhappy dispute with the American colonies, was Great Britain once more forced to take up arms; not merely for the preservation of existence, as in former struggles, but of everything by which existence is rendered dear.'

Just a few weeks after Wadham and Stevens signed their new lease, the frenetic property construction boom in Bristol – described by Ison (1952; 212) as a *'period of reckless speculation which lasted from 1786 to 1793'* (precisely the span of years under consideration here in relation to Queen's Parade) - was stopped in its tracks by the national economic crisis that ensued in the fevered climate of consternation over the coming war, the spread of revolution in Europe, and the real potential for invasion. Construction activity in the city halted almost overnight, with 500 or more houses said to have been left standing unfinished for over a decade thereafter. A letter from that year attests in horror that *'Bankruptcies happen almost every day in Bristol and God knows where it will end'* (quoted in *'The Trade in Bristol in the Eighteenth century'*; Vol.XX; Bristol Record Society). In fact, there were 94 bankruptcies in Bristol in 1793 (with the majority occurring by the end of that May), compared with just 13 in 1792, and it has been estimated that by the end of the year one third of the city's builders were insolvent (Jones, D (1992) quoted in Manson M (2013, p35)). Thomas Stevens was bankrupted at some time in the fallow years that followed and was bought out of the development partnership by John Wadham Jnr (BRO ref.821/2/e/1). John Wadham Snr and Jnr appear to have had sufficient resources to weather the crisis, although it may be no coincidence that the family share in Wadham, Fry, Ricketts & Co and the Phoenix Glass Works was sold on 29 January 1795 (BRO ref. 12143/9).

By chance then, the 1793 lease plan essentially records the terrace and its state of development at the very moment the financial crisis struck, with nos.2, 13 and 14 incomplete and uninhabitable and its proposed extension across the current application site with three further houses and their gardens yet to be commenced. It is unclear for how long the three unfinished houses remained in that state. The proposed westward extension of the terrace up to the corner with York Place never happened, although the site for these houses had been excavated/quarried and prepared and at least one cellar space may have been formed under Queen's Parade in anticipation of their construction taking place [Figure 10].



FIGURE 10: VIEW WITHIN SITE LOOKING NORTH TO RETAINING WALL AND QUEEN'S PARADE BOUNDARY WALL SHOWING (ARROWED) POTENTIAL BLOCKED OPENING INTO CELLAR SPACE BENEATH THE ROAD

While other oddities and idiosyncrasies can be seen in the elevations of the terrace that undoubtedly could enrich our understanding of its construction and ongoing history after 1793 still further (for instance, noticeable variations in fanlight design over the front entrance doors), this heritage statement does not purport and is not required to be a definitive comprehensive history of the environs of the application site, and it is unlikely that providing answers to such unresolved issues will further its purpose in fulfilling the NPPF's requirement that *'the applicant [should] describe the significance of any heritage assets affected [by the proposed development of the application site], including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance...'*

The listed terraces on York Place

Regrettably, tracing the relevant history of construction of the houses on both sides of York Place with precision and detail is significantly more difficult than for the Queen's Parade terrace. The 1784/85 development plan for the area leased by John Wadham included the future York Place, and the nature of the development at that time has been described already. It is unclear precisely when the street (shown again on the plan within Wadham and Stevens 1793 lease – see Figure 9) was physically laid out on the ground, but the construction process for Queen's Parade and its main terrace outlined in the preceding subsection suggest that, logically, the line(s) of the road at the very least had been laid out in the later 1780s. However, it is certain that the terraced housing on either side of York Place was not built at the same time as the Queen's Parade terrace. All evidence points to its commencement being delayed for well over a decade - as with many contemporary developments in Bristol - by the 1793 economic and property collapse.

As the DBA records (its section 3.26), Donne's 1815 map shows York Place (the street) already in place, with its upper western side up to Queen's Parade and its lower eastern corner with Limekiln Lane both developed. Two advertisements in the Bristol Mirror help us a little more in terms of probable dating for this building work. The first mention of York Place found during preparation of this statement (ruling out streets of the same name in Clifton and Montpellier) is in the Bristol Mirror edition of 12th August 1809, in which a J. Barrett, harpsichord and piano-forte tuner, sought the ongoing patronage of his customers on his local move from no.19 Limekiln Lane to no.1 York Place. Around 18 months later, on 16th March 1811, the auction of 10 foreign marble chimney pieces – said to be of interest to *'builders and gentlemen erecting houses'* – at the Marble Rooms on the *'corner of York-Place, Limekiln-Street (sic)'* was advertised by auctioneer, Job Harril. The most obvious interpretation of the 1809 advertisement would seem to be that the first houses in York Place – on its western side – started to become available for occupation in 1809, while the second advertisement simply helps to confirm that York Place off Limekiln Lane was a valid address at the time.

A lease of the application site in 1848, which is discussed further below, tells us that the site had previously been leased by the Dean and Chapter of the Cathedral in June 1810 *'together with certain houses and other premises'* to Thomas Cann and his wife, Elizabeth, for a term of 40 years. The 1810 lease to the Canns has not been found during archival research (nor has any other information about them) but, put together, these pieces of evidence suggest a concerted phase of construction and/or related leasehold activity taking place in 1809/10 on the land on both sides of the newly created York Place. In 1793, the future location of York Place formed part of the land demised in the Corporation's further lease to Wadham and Stevens. By 1809/10, Stevens had been bankrupted and John Wadham snr had been dead for a decade. The Canns may have been responsible for the development of York Place in 1809/10, but no documentation has been found during study for this statement to either support or disprove this and it may be that their 1810 lease related solely to the still undeveloped corner plot between Queen's Parade and York Place, today's application site.

What can be said with certainty about York Place as it was being developed at the end of the first decade of the 19th century is that, unlike Queen's Parade and its terrace of houses, it was not built out in the manner intended when the 1784/75 area development plan was drawn up. Perhaps on emerging from the prolonged financial crisis, the developer – whoever it was – felt more cautious and so previous intentions were changed. The terraces of nos. 3-7 York Place (with no.15 Queen's Parade on the corner) and nos.8-11 York Place were built, but without the front gardens that had been proposed.

By the time of Donne's 1815 map, aside from the Marble Rooms on the lower corner with Limekiln Street, the eastern side of York Place remained undeveloped. Thirteen years later, Ashmead's more detailed (and more accurate) 1828 map [Figure 11] indicates that the lower eastern side of York Place had been developed with a terrace, but the current application site was – bar a small structure at its south western corner – still open ground. Seemingly, it would remain so for perhaps 60 to 70 years.



FIGURE 11: EXTRACT FROM ASHMEAD'S 1828 PLAN (©BRISTOL CITY COUNCIL/KYP; ORDNANCE SURVEY PMCL 100061726)

The application site at the corner of York Place and Queen's Parade

It has been suggested above that the current application site may have been used, along with the future site of nos.13 and 14 Queen's Parade, as a convenient builder's yard during the construction of the main Queen's Parade terrace from 1786. The erection of nos. 13 and 14 commenced in 1791/92 – if this hypothesis is correct, thereby reducing the size of the yard, but presumably acceptably so, due to the reduced scale of construction work that was involved. By the time the major economic crisis hit Bristol in early 1793, the need for a yard would have passed, one imagines, but the building of the three houses planned for the corner of York Place and Queen's Parade as a continuation of the Queen's Parade terrace was put on ice and eventually abandoned altogether.

The history of leasehold ownership of this corner plot (as it will be termed in the description below for clarity of understanding) – congruent with today's application site – between 1793 and 1810 is entirely unknown. Ownership may have reverted to the Corporation of Bristol or to the Dean and Chapter of Bristol Cathedral, whether alone or as part of a larger parcel of land that was to become York Place, but confirmatory records have not been found during study for this heritage statement.

It is known that on 3rd June 1810 the Dean and Chapter of the Cathedral leased the corner plot to Thomas and Elizabeth Cann *'together with certain houses and other premises'* for a term of 40 years.

The 1810 lease has not been found, but the wording of the 1848 lease (mentioned above) relating to the corner plot alone might be read to imply that the Canns' earlier lease was for a larger parcel of land that included houses (whether built or proposed).

It is of course the case that the corner plot would have functioned just as well as a builder's yard during the construction of the terraced houses on each side of York Place from 1809/10 onwards as it might have done earlier for the Queen's Parade terrace. However, that would have depended upon the identities of the developer and of the leasehold owner of the corner plot, and its availability at the time. None of that is known.

As the DBA has noted, Donne's map of 1815 and Ashmead's of 1828 [Figure 11] both indicate that the corner plot itself remained open and undeveloped through the first quarter of the 19th century, although the 1828 map does show a long rectangular structure, possibly a stable, within a small enclosure at its south western corner, built against the gable end of the relatively newly completed terrace of nos.8-11 York Place. Pigot's Directory of 1830, nearly contemporary with Ashmead's 1828 map, contains various entries for 'York Place, Brandon Hill', but none relate to a possible commercial use of the plot and its enclosed outbuilding.

Again, as the DBA explains, Bristol Archives holds a lease of the corner plot dated 26th September 1848 from the Dean and Chapter of the Cathedral to John Barrett, music-seller. The title page calls it a '*Concurrent Lease of a piece of Garden Ground and Premises in York Place for 40 years*' and Barrett's demised interest is made subject to that of the Canns, which had 18 months or so left to run. The lease makes clear that the plot was already in the occupation of William Pollard and James Ross as Barrett's tenants, although for how long that had been the case is unclear.

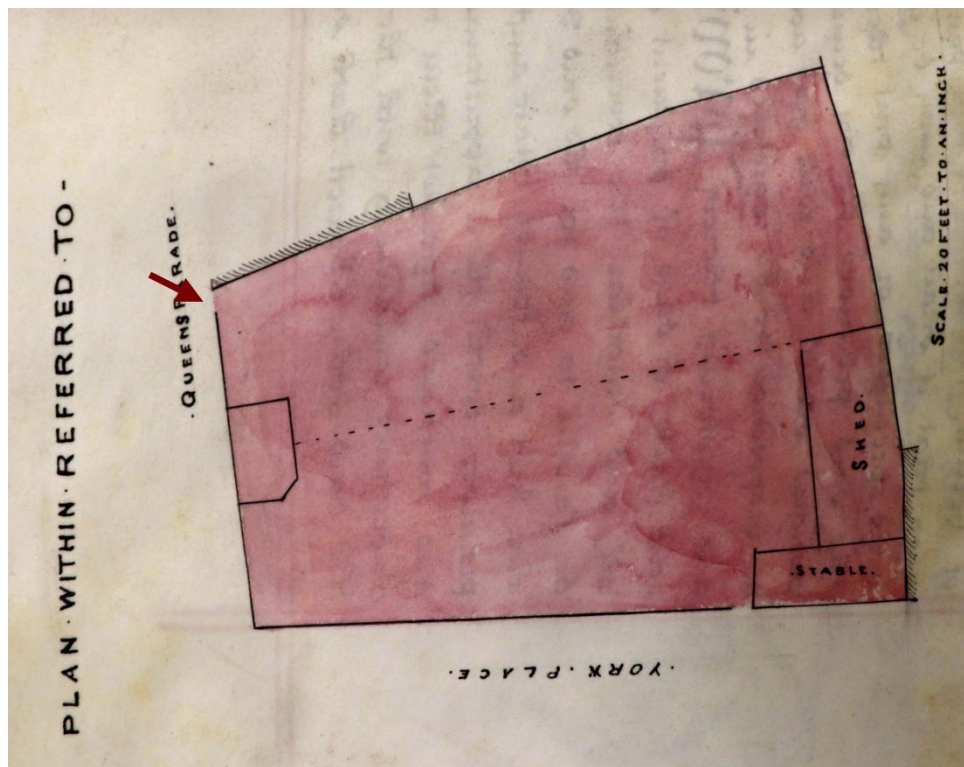


FIGURE 12: LEASE PLAN OF 1848, WITH PEDESTRIAN ACCESS FROM QUEEN'S PARADE ARROWED (©BRISTOL ARCHIVES REF. DC/E/40/27/1)

The plan within the lease document [Figure 12] shows the corner plot split longitudinally (that is, parallel to York Place) – perhaps by a fence - to form two near equal parts. The half nearest York Place contained a stable and shed. Both Ashmead’s 1855 map and the 1884 Town Plan [Figure 13] show the same division, so it was a long running feature of the corner plot. Interestingly, although the plan is rather schematic and so its evidence must be treated with caution, it appears to show the entrance through the boundary wall against the corner of no.14 Queen’s Parade that can still be seen today [Figure 3].



FIGURE 13: 1888 TOWN PLAN (©BRISTOL CITY COUNCIL/KYP; ORDNANCE SURVEY PMCL 100061726)

Hunt’s Directory of 1849 lists William Pollard as a coach spring maker and coach smith based around the bottom corner of York Place on Limekiln Lane and, as the DBA mentions, the 1856 Post Office Commercial/Kelly’s Directory for Gloucestershire, Bath and Bristol also list him as a coach builder in the same location. The most obvious explanation for his shared tenancy of the corner plot in the 1840s/50s would be as stabling and a green space/yard for the horses used by his business. Barrett’s interest in the lease was likely to have been financial. We have already seen above that one J. Barrett, a harpsichord and piano-forte tuner, was one of the first occupants to move into York Place in the summer of 1809. Pigot’s Directory of 1830 reveals that he was then resident at 15 Queen’s Parade (that is at the top of the western side of York Place) and the 1841 decennial census, by extrapolation, shows he had moved in the interim to 1 Queen’s Parade. While that John (Slater) Barrett died in 1842,

Pigot's 1849 Directory and the 1851 decennial census return tell us that his son, also John Barrett, a music teacher, continued to live at no.1 Queen's Parade along with his sister, Delphina, a 'Proprietor of Houses'. A fair assumption would be that the Barrett family subsidised their income through local property rental activity – a not uncommon sideline in the 19th century for people of their social status.

William Pollard died in May 1856. The tenancy of the corner plot seems to have passed to Edward Barr, a saddler, who lived at 1 College Street at the junction with Limekiln Lane. Again, it is presumed that the interest in the plot was the enclosed stabling and small 'paddock' that it afforded – a reasonably rare commodity in the locality. At some time before the survey work for the 1884 Town Plan was undertaken [Figure 13], the York Place and Queen's Parade perimeters of the plot came to be built up with a range of largely open-fronted timber and metal sheeted structures, most probably coach or cart sheds and additional stabling – but when, by whom, and for what cannot be said with certainty. As the DBA mentions, the 1884 Town Plan depicts clearly the staircase access onto the rear section of the corner plot from Queen's Parade, although as noted above this appears to have been in place before 1848 (and may well have been built in at the time the boundary wall was constructed in the early 1790s, since otherwise there would have been no direct access/egress from the low level site to the frontage of the terrace while being built on Queen's Parade).

Although John Barrett died in June 1881, it is believed that his widow, Louisa, (who continued to live at 1 Queen's Parade) inherited the lease of the plot until the expiry of the 40 year term in September 1888. On reversion, the Ecclesiastical Commission conveyed the land on 6th November 1888 for the building of a temporary new mission chapel at Brandon Hill, the Church of the Good Shepherd, as a result of the campaigning efforts of the Vicar of St George, Brandon Hill, the Revd. Frederick A Lefroy. The DBA (section 3.29-3.30 and its Figure 19) provides details and a contemporary plan of the mission chapel, as well as covering its subsequent history in outline, and it is unnecessary to repeat that here, beyond noting that its construction was completed by the end of 1890 and it is recorded as such on the 1891 decennial census, taken on the night of 5th April, between the entries for nos.7 and 8 York Place. The chapel remains the most prominent built component – aside from the boundary wall, arguably – on the application site.

Again, without unnecessarily reiterating the DBA's content, the chapel was appropriated by the Ecclesiastical Commission in February 1933 as the replacement Infants' School annexe site of St George's Church of England Primary School. A new school room/solarium, with a skittle alley beneath, was built against the gable end wall of no.14 Queen's Parade that year, replacing the steps leading up to the pedestrian gateway through the boundary wall there. That 1933 building also remains in situ today. The school was closed in August 2021, leading to the application site's current redundancy.

2.2.3 Summary of key learning from development history

The foregoing development history can be distilled into a number of key points that are of importance in understanding today's character and appearance of the built environs immediately surrounding and including the application site:

- The listed terrace, nos.1-14 Queen's Parade, was built at the zenith of Bristol's mid-Georgian building boom between 1786 and the end of January 1793. During construction over of those years, the design of the terrace morphed somewhat from original intentions, leaving physical traces which can still be seen in its principal façade. The terrace we see today was almost, but not quite complete by the time the severe financial crisis of February 1793 brought construction in the city to a sudden catastrophic halt. However, its planned continuation with a further three houses across the application site was stalled and never came to fruition.
- The construction of the terrace was a major undertaking, requiring the excavation and quarrying of the base of the slope of Brandon Hill from York Place in the west to Brandon Steps in the east as a preliminary exercise in order to create a flat and deep 'plateau' or terrace for construction, with an upper levelled terrace on which Queen's Parade would be laid out. The large quantity of Brandon Hill Grit that was hewn out of the slope seems to have been used in part to build matching boundary walling for the new terrace's back gardens and around the perimeter of the application site. The latter was quite possibly used as a builder's yard for the development. The opening through its boundary wall onto Queen's Parade beside no.14 was there by 1848 and logically is likely to have been an original feature.
- The development of housing along York Place – an integral part of the original plan - was held back by the acute 1793 economic slump that crippled Bristol for the coming decade and a half. Building on York Place (and the end of Queen's Parade to the west of it) seems to have commenced in 1809/10 and was perhaps finished around a decade later. The application site was left open, possibly again being used at first as a builder's yard for construction of the houses in York Place. However, thereafter, it seems to have afforded a secure/walled open space with stabling and grass for grazing that was relatively rare in the locality (and therefore would have been constantly in demand).
- From 1890, first religious and then educational use have dictated the nature and size of built form on the site, until its redundancy for school use in 2021.

3 THE IDENTIFICATION OF HERITAGE ASSETS BEING POTENTIAL RECEPTORS OF IMPACTS FROM THE DEVELOPMENT PROPOSALS

3.1 Introduction

3.1.1 Heritage assets and their level of significance

The NPPF defines a heritage asset as being ‘*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest*’ and the significance of a heritage asset as being ‘*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting*’.

The value of heritage assets can be expressed with regard to the component elements of heritage significance defined within Historic England’s ‘Conservation Principles’ (EH 2008), namely:

- **Evidential value**, which derives from the potential of a place to yield evidence about past human activity;
- **Historical value**, which derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative;
- **Aesthetic value**, which derives from the ways in which people draw sensory and intellectual stimulation from a place; and
- **Communal value**, which derives from the meanings of a place for the people who relate to it or for whom it figures in their collective experience and memory. These values are closely associated within historical and aesthetic values, but tend to have additional and specific aspects.

The NPPF defines a similar set of values, but using slightly different terminology: architectural; archaeological; artistic; and historic. These terms are used where appropriate below to define heritage values.

In order to quantify the relative significance of heritage assets in this statement – in other words, to provide a ‘hierarchy’ of significance – the following table has been adapted for this assessment from ICOMOS’s Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS 2011), to take into account the latest (2021) iteration of the NPPF. The ICOMOS guidance is intended as a robust and defensible system for assessing value and evaluating heritage impacts, for all kinds of built cultural property and not just that of World Heritage status in its own right.

Level of Significance	Criteria
Very high	World Heritage Sites; Assets of acknowledged international importance; Assets that can contribute significantly to acknowledged international research objectives; Historic landscapes of international value (designated or not) and extremely well preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s).
High	Scheduled Monuments and non-designated assets of Schedulable quality and importance; Grade I and II* Listed buildings (Scotland category A); Other Listed buildings that can be shown to have exceptional qualities in their fabric or associations not adequately reflected in their Listing grade; Conservation Areas containing very important buildings; Non-designated structures of clear national importance; Designated and non-designated historic landscapes of outstanding historic interest (including Grade I and Grade II* Registered Parks and Gardens); undesignated landscapes of high quality and importance of demonstrable national value; and well preserved historic landscapes exhibiting considerable coherence, time depth or other critical factor(s); Assets that can contribute significantly to acknowledged national research objectives.
Medium	Designated or undesignated assets that contribute to regional research objectives; Grade II (Scotland category B) Listed buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical association; Conservation Areas containing important buildings that contribute significantly to their historic character; Historic townscapes or built up areas with important historic integrity in their buildings, or built settings (for example including street furniture or other structures); Listed buildings not identified as of 'the highest significance' i.e. Grade II Listed buildings.

Level of Significance	Criteria
	Non-listed buildings of particular interest, particularly those highlighted as positive buildings or focal buildings in Conservation Area Appraisals Archaeological remains not of the 'highest significance' but with the potential to contribute distinctly to archaeological knowledge. Often remains associated with past types of activity identified in Regional Research Frameworks and the broader heritage community and academia as of particular interest or importance. Designated landscapes of special historic interest (including Grade II Registered Parks and Gardens); undesignated landscapes that would justify such a designation; averagely well preserved historic landscapes with reasonable coherence, time depth or other critical factor(s); landscapes of regional value.
Low	Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual associations; Assets of limited value, but with potential to contribute to local research objectives; Locally Listed buildings (Scotland category C(S) Listed Buildings) and historic (unlisted) buildings of modest quality in their fabric or historical association; Archaeological remains which have a degree of significance meriting consideration in planning decisions, due to their heritage interest; Historic townscape or built-up areas of limited historic integrity in their buildings or built settings (for example including street furniture or other structures); Robust undesignated historic landscapes; historic landscapes with importance to local interest groups; and historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations.
Negligible	Archaeological remains which do not have a sufficient degree of interest to comprise 'heritage assets' or with very little surviving archaeological interest; Buildings of little architectural or historical note; Landscapes with little significant historical interest.

Table 1: Levels of significance

Whilst, inevitably, some subjectivity is at times involved in making value judgements, this hierarchy of values has to be appreciated as a continuum and there may be ‘shades’ of interpretation where, for instance, an asset lies close to the borderline between the descriptions of ‘high’ and ‘very high’ significance. In these instances, in this statement, the assessment of an asset’s significance will be expressed as *‘high (approaching very high)’* where it is considered there are attributes present that potentially uplift the basic assessment of high significance towards, but not reaching, its borderline with very high or *‘very high (approaching high)’* where certain attributes potentially depress the basic assessment of very high significance towards its borderline with high.

3.1.2 The nature of heritage assets: designated and non-designated heritage assets

From a heritage perspective, built and other assets in the environment are either heritage assets or ordinary assets. Those that are classified as heritage assets may be designated (for example, a listed building or conservation area) or non-designated. The NPPF, which contains the Government’s national heritage policy, defines ‘designated’ heritage assets (being World Heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas), but not non-designated heritage assets. However, in defining the term ‘heritage asset’, it does by implication determine that those assets which are non-designated are *‘assets identified by the local planning authority (including local listing)’*.

More helpfully, under the heading *‘What are non-designated heritage assets and how important are they?’*, paragraphs 039 and 040 of the Ministry of Housing, Communities and Local Government’s 2021 ‘Planning Practice Guidance: Conserving and enhancing the historic environment’ states:

‘Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.’

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets. [Paragraph 039]

There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence. [Paragraph 040]’.

3.1.3 The nature of settings to heritage assets

The NPPF makes the point that significance (which it defines as *‘The value of a heritage asset to this and future generations because of its heritage interest’*) derives *‘not only from a heritage asset’s physical presence, but also from its setting’*. It defines the setting of a heritage asset as being:

‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative

contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'

In 2017, Historic England issued its revised guidance on 'The Setting of Heritage Assets' as Historic Environment Good Practice Advice in Planning: 3. Amongst other things, this advises that:

'The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral [NPPF glossary]. All of the following matters may affect the understanding or extent of setting:

- *While setting can be mapped in the context of an individual application or proposal, it does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset because what comprises a heritage asset's setting may change as the asset and its surroundings evolve or as the asset becomes better understood or due to the varying impacts of different proposals; for instance, new understanding of the relationship between neighbouring heritage assets may extend what might previously have been understood to comprise setting.*
- *Extensive heritage assets, such as landscapes and townscapes, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own. A conservation area will include the settings of listed buildings and have its own setting, as will the village or urban area in which it is situated [explicitly recognised in green belt designations].*
- *The setting of a heritage asset may reflect the character of the wider townscape or landscape in which it is situated, or be quite distinct from it, whether fortuitously or by design [eg a quiet garden around a historic almshouse located within the bustle of the urban street-scene].*
- *Setting in urban areas, given the potential numbers and proximity of heritage assets, is therefore intimately linked to considerations of townscape and urban design and of the character and appearance of conservation areas. The character of the conservation area, and of the surrounding area, and the cumulative impact of proposed development adjacent, would suggest how much impact on the setting should be taken into account.*
- *[...]*
- *Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'*

3.1.4 Types of impacts

The NPPF notes that harm can be caused to the significance of a heritage asset by its alteration or destruction, or from development within its setting. Put another way, impacts – whether beneficial or adverse – that might affect the significance of a heritage assets will either be:

- Direct physical impacts on its built fabric or character; or,
- Indirect impacts on the contribution made by its setting to its significance.

3.2 The identification of heritage assets being potential receptors of impacts from the development proposals

3.2.1 Background to the identification of built/cultural heritage assets having the potential to receive impacts from the development

The following assessment of potential receptors of impacts from the proposed development relates to built/cultural heritage assets only. Below ground and other archaeological assets are excluded from the assessment, being covered within BBHC's desk-based archaeological assessment.

Paragraph 194 of the 2021 version of the NPPF demands that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance...'

Moreover, as has already been explained, the Historic Environment Good Practice Advice in Planning: 2 reiterates this requirement in its advocated approach to dealing with heritage assets, which begins *'Understand the significance of the affected assets'*.

Accordingly, by extension, this heritage statement is required by this policy and associated guidance to identify:

- Designated heritage assets within or [if a designated area-wide asset] including the site, which might potentially receive direct impacts from the development of the site;
- Non-designated heritage assets within the site, which might potentially receive direct impacts from the development;
- Designated heritage assets beyond the boundaries of the site, whose settings might potentially receive indirect impacts from the development, leading to harm to significance of the heritage asset;
- Non-designated heritage assets beyond the boundaries of the site, whose settings might potentially receive indirect impacts from the development, leading to harm to significance of the heritage asset.

The next sections of the statement for the site identify the heritage assets that might fall into these four categories and which must therefore be considered to be potential receptors of impacts – whether direct or indirect - from the development.

3.3 Designated heritage assets within or including the development site

The identification of designated heritage assets lying within the setting of the site and its wider environs that might experience positive or negative impacts from the application's development proposals has primarily relied upon examination of the National Heritage List for England [NHLE] maintained by Historic England, together with an understanding of the nature and extent of the proposed works, as set out in the application drawings and Design and Access Statement [DAS]. The NHLE database is the '*official list of buildings, monuments, parks and gardens, wrecks, battlefields, World Heritage Sites and other heritage assets considered worthy of preservation*' and so provides information on the location of all designated heritage assets in England, with the exception of conservation areas (which are regarded as being the preserve of local planning authorities).

The NHLE indicates that there are no designated built heritage assets within the redline boundary of the site.

3.4 Non-designated heritage assets within or including the application site

3.4.1 Introduction

The nature of non-designated heritage assets has been explained in section 3.2.1 above – namely, they are '*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets*'.

As previously noted, the temporary mission chapel at Brandon Hill, the Church of the Good Shepherd, built on the site in 1890 as a result of the campaigning efforts of the Revd. Frederick A Lefroy and subsequently appropriated by the Ecclesiastical Commission in 1933 as the replacement Infants' School annexe site of St George's Church of England Primary School, is included on the Bristol Local List (Local List ID 64; included on the list in 2015).

Additionally, the status of the boundary wall of the site as a heritage asset must be considered here. The distinctive detailing of the Brandon Hill Grit, sandstone, and red brick capped wall running along the perimeter of the site echoes closely that of the rear garden boundary walls behind the Queen's Parade terrace (cf. Figures 2, 3 and 6). It seems likely that they were built at the same time, but since 1793 historical accident has separated them in terms of both ownership and relationship to the Queen's Parade terrace, so that for most of the 19th century and since the boundary wall of the site is entirely distinct and divorced from the terrace to its east. Historic England's 2018 Advice Note 10 'Listed Buildings and Curtilage' [HEAG125] states in introducing the subject of curtilage listing that:

The law [the Planning (Listed Buildings and Conservation Areas) Act 1990] provides that buildings and other structures that pre-date July 1948 and are within the curtilage of a listed building are to be treated as part of the listed building. Working out whether a building has a curtilage and the extent of that curtilage can be difficult.'

Without rehearsing the complexities of curtilage and curtilage listing, it is almost certain that the rear garden walls to the Grade II listed nos.1-14 Queen's Parade share that listing. However, because of its separate history after c.1800, it is probable that the perimeter wall of the site does not share that listing, despite its potentially common origins with the terrace's garden walls. While, as Historic England also notes in the same Advice Note:

'...understanding curtilage rests on the particular facts of each case. It will be for the local planning authority to reach a conclusion as to whether or not buildings are within a particular curtilage, and ultimately a matter for the court to determine if that decision is thought unreasonable'

and it is the case that Bristol City Council's has not identified the perimeter wall of the site as being of heritage value in the CACAMP or by entry on the Local List, this provisional conclusion of this heritage statement is that the boundary wall should be regarded as being a non-designated heritage asset.

After careful study and consideration, none of the other structures on the site at present are considered to have sufficient heritage value to merit identification as a non-designated heritage asset.

3.4.2 Former Mission Chapel/Church of the Good Shepherd, York Place

The history of development of the former chapel has been described in the DBA and in section 2.2.2 above. The original 1890 plans for its design, including elevations and sections, are retained in Bristol Archives (ref. Building Plans Vol. 25, folio 22b - see Fig 19 of the DBA).

The chapel building has meaningful architectural and historical value, warranting its consideration in planning decisions, and it is identified within the CACAMP as being an unlisted Building of Merit (and hence its inclusion in 2015 on the Local List). While some changes have been made to the building, its original form is clearly evident.

The building is visible from York Place, Queen's Parade and the slopes of Brandon Hill and its setting extends to all such area and includes the whole of the application site.

As a non-designated heritage asset, the significance of the former chapel is likely to be lower than for a nationally designated structure and, applying the hierarchy of significance provided in the table in section 3.1.1, it can appropriately be considered to be a non-designated heritage asset of low significance.

3.4.3 Perimeter boundary wall of site

The stone and brick boundary wall to the site, with its swept/reverse curved form, has already been described, along with its probable construction contemporaneously with the Queen's Parade terrace.

The wall provides distinctive character within and to the immediate CA. Again, as a provisionally identified non-designated heritage asset of value to the CA and within the setting of the listed Queen's Parade terrace, it is considered to be of low significance.

3.5 Designated heritage assets within the wider environs of the site

3.5.1 Introduction

As noted above, identification of designated heritage assets in the wider environs of the site has largely relied upon use of the NHLE, although that list does not include designated conservation areas. The NHLE search of the immediate area around the application site [Figure 14] backed up by site analysis indicates that there are five designated heritage assets in the wider environs that might realistically receive impacts from the specific development proposal of the application site. The list of these potential receptors is set out and examined immediately below, along with three further assets – Park Street and Brandon Hill CA (in which the site lies), College Green CA, and City Docks CA [Figure 15]. Additionally, views analysis within Park Street and Brandon Hill CA (specifically outward views from the slope of Brandon Hill) suggests that three more designated heritage assets - Bristol Cathedral, the Church of St Mary Redcliffe and Cabot Tower atop Brandon Hill - should be added to the list of potential designated receptors of impacts.



FIGURE 14: EXTRACT FROM NATIONAL HERITAGE LIST FOR ENGLAND SHOWING DESIGNATED HERITAGE ASSETS IN THE WIDER ENVIRONS OF THE SITE (LISTED BUILDINGS ANNOTATED WITH BLUE TRIANGLES; SCHEDULED MONUMENT SHADED RED) (©HISTORIC ENGLAND)

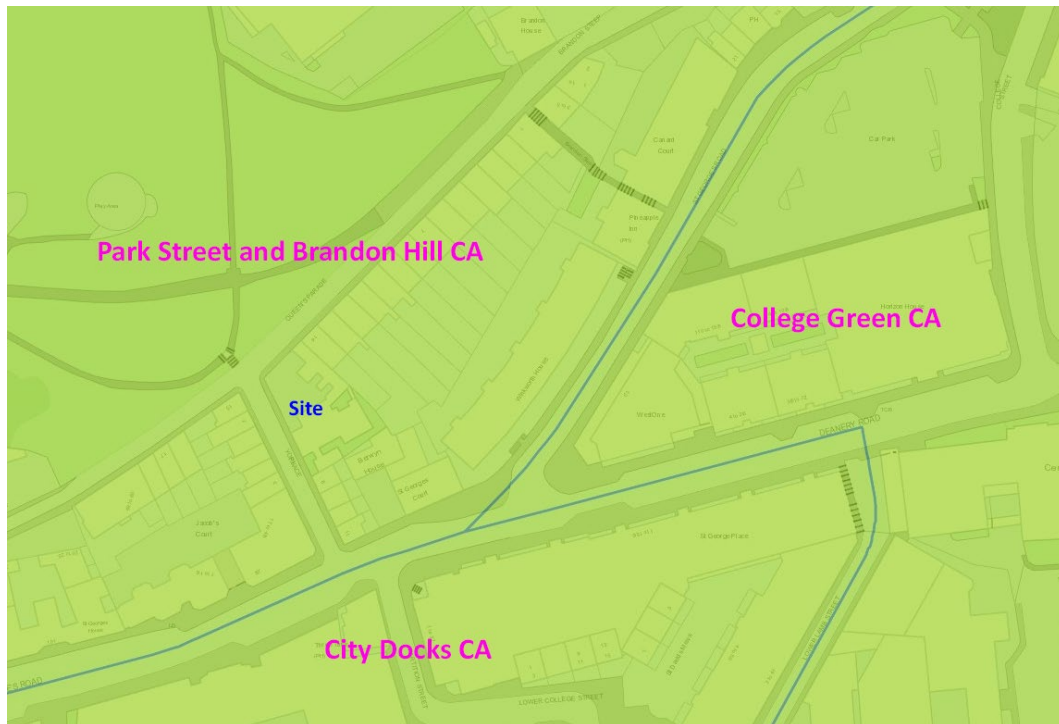


FIGURE 15: ANNOTATED MAP SHOWING THE LOCAL DISTRIBUTION OF CAs IN RELATION TO THE SITE (©BRISTOL CITY COUNCIL/KYP; ORDNANCE SURVEY PMCL 100061726)

3.5.2 1-14 Queen's Parade (Figure 14; 1)

The fourteen houses forming the terrace on the south side of Queen's Parade [Figures 2, 16, 17] are jointly designated as a Grade II listed building. The terrace was first listed in January 1959. The list entry describes the building as:

'Terrace of 14 houses. c1794. Stucco with limestone dressings, party wall stacks and a pantile roof. Double-depth plan. Late Georgian style. Each of 3 storeys, attic and basement; 2-window range, Nos 7 & 8 three-window range. A composed terrace to the extent of having a central pair of wider houses; irregular pilasters, to a moulded coping. Semicircular-arched doorways on the side toward the middle of the terrace, good with wide fanlights over margin lights, fluted jambs and 6-panel doors. 6/6-pane sashes, 3/6-panes to the second floor; 4-pane narrow basement windows, and some single dormers. The rear elevations have varied fenestration including wide ground-floor Venetian windows. INTERIOR: entrance hall with a semicircular arch to a central lateral dogleg stair with stick balusters, and ramped rail; fireplaces, 6-panel doors and shutters. Some houses have dogleg stairs to the party walls. Plans vary, as the interiors were probably fitted out to suit different clients. A unique style of doorway for Bristol.'

The changing history of design intent of the terrace before and during construction has been explained in section 2.2.2 above and the eventual intention at the start of 1793 for the terrace to continue across the Queen's Parade frontage of today's application site to comprise 17 houses in total demonstrated.



FIGURE 16: VIEW ALONG THE LISTED TERRACE FROM THE BASE OF BARNDON HILL LOOKING SOUTH WEST



FIGURE 17: VIEW FROM BRANDON HILL OF (L TO R) THE LISTED 1-14 QUEEN'S PARADE, THE APPLICATION SITE, PART OF LISTED 3-7 YORK PLACE & 15 QUEEN'S PARADE, AND LISTED 16, 17 AND 18 QUEEN'S PARADE

The terrace has architectural and historical significance, as described already. It forms an important piece of late 18th century townscape at the base of the Brandon Hill, speaking of the development of Bishop's Park for housing at the time right up to the slopes of the hill. It also provides evidential value of the contemporary development process and the social ambition of local citizens, and historical evidence of the great impact of the financial collapse and aftermath in Bristol from 1793 to around 1810.

The setting of the listed terrace is dominated by the beauty, greenness, and landscape and ecological values of Brandon Hill. As the perimeter development at the base of the hill, that setting goes to reinforce the terrace's considerable social and townscape importance in the last quarter of the 18th century when it was being planned and developed. The application site sits to one side of the terrace, within this wider setting. As has already been remarked, its openness today is a reflection of a historical accident that has shaped the immediate environs of the listed building.

No access has been gained to nos.1-14 or their rear gardens during preparation of this statement and therefore this assessment of significance has had to upon documentary evidence, including the foregoing list description. Using the hierarchy of significance provided in section 3.1.1, the Grade II listed terrace is considered to be a designated heritage asset of **medium significance**. The meaningful contribution made by its setting to this significance is considerable.

3.5.3 8-11 York Place (Figure 14; 2)

The four houses forming the terrace on the east side of York Place are jointly designated as a Grade II listed building. The terrace was first listed in December 1994. The list entry describes the building as:

'Terrace of 4 houses. Early C19. Render with limestone dressings, party wall stacks and pantile valley roofs. Double-depth plan. Late Georgian style. Each of 3 storeys and basement; 1-window range. A stepped terrace has pilaster strips to a cornice and parapet with blind windows; left-hand semicircular-arched doorways have keys and imposts, plate-glass fanlights and 6-panel doors with flush lower panels. No.11 has 8/8-pane sashes and 4/4-pane basement sash, the rest horned sashes with 6/6 margin panes. INTERIOR not inspected.'

The original intention had been to develop this terrace at more or less the same time as 1-14 Queen's Parade. The reasons that did not happen have been explained. The listed terrace has architectural and townscape value of its own, while comparison with the listed 1-14 Queen's Parade demonstrates the different contemporary social strata present in the immediate area beside Brandon Hill. The immediate setting of the terrace is dominated by the steepness of York Place, but also of note is the rapid transition it provides from the dense and busy urban workaday environment of St George's Road to the quiet and green dramatic open landscape of Brandon Hill.

No access has been gained to nos.8-11 or their rear gardens during preparation of this statement and therefore this assessment of significance has had to upon documentary evidence, including the foregoing list description. Using the hierarchy of significance provided in section 3.1.1, the Grade II listed terrace is considered to be a designated heritage asset of **medium significance**. Setting makes a moderate contribution to this significance.

3.5.4 3-7 York Place and 15 Queen's Parade (Figure 14; 3)

The six houses forming the terrace on the west side of York Place and turning the corner at its head on to Queen's Parade are jointly designated as a Grade II listed building. The terrace was first listed in June 1974. The list entry describes the building as:

'Terrace of 6 houses. Early C19. Render over rubble, with limestone dressings, brick party wall stacks and a pantile mansard roof. Double-depth plan. Each of 3 storeys, attic and basement; 1-window range. Coped parapet, right-hand semicircular-arched doorways with raised architraves, plate-glass fanlights and 6-panel doors. Plate-glass sashes in flush frames. INTERIOR: central dogleg winder stair with stick balusters and column newels.'

All the comments on significance and setting made for nos.8 - 11 York Place apply for this listed terrace, too.

No access has been gained to nos.3-7 and 15 or their rear yards during preparation of this statement and therefore this assessment of significance has had to upon documentary evidence, including the foregoing list description. Using the hierarchy of significance provided in section 3.1.1, the Grade II listed terrace is considered to be a designated heritage asset of **medium significance**. Setting makes a moderate contribution to this significance.

3.5.5 16, 17 and 18 Queen's Parade (Figure 14; 4)

The three houses forming the terrace on Queen's Parade to the west of 15 Queen's Parade are jointly designated as a Grade II listed building. The terrace was first listed in January 1959 and was subsequently amended in March 1977. The list entry describes the building as:

'Terrace of 3 houses. Early C19. Render over rubble, with limestone dressings, brick party wall stacks and a pantile double-pile roof. Double-depth plan. Each of 3 storeys, attic and basement; 1-window range. Coped parapet, right-hand semicircular-arched doorways with raised architraves, keys and imposts, plate-glass fanlights and 6-panel doors. 6/6-pane sashes in flush frames. INTERIOR not inspected.'

The houses have architectural and historical interest in a similar way to those on York Place. The end gable of no.16 also adds valuable material character to the streetscape in its use of local sandstone, which stands out in the views along Queen's Parade and from the base of Brandon Hill.

No access has been gained to nos.16-18 or their rear gardens during preparation of this statement and therefore this assessment of significance has had to upon documentary evidence, including the foregoing list description. Using the hierarchy of significance provided in section 3.1.1, the Grade II listed terrace is considered to be a designated heritage asset of **medium significance**. Setting makes a moderate contribution to this significance, although recent development immediately to the west of the terrace has somewhat impaired that setting.

3.5.6 Civil War defences on Brandon Hill (Figure 14; 5)

The extended scheduled monument running north-south down the slope of Brandon Hill overlooking and to the west/north west of the application site was first designated for protection in January 1961 and its scheduling description was last amended in October 2016. The entry in the schedule summarises the monument as being:

'The remains of two phases, 1642-43 and 1643-45, of Bristol's Civil War defences, found on Brandon Hill, a steep hill on the west side of the City of Bristol, that commands good views of the River Avon and the S of the city. It includes the remains of Brandon Hill Fort, the Water Fort and the connecting lines.'

The asset is archaeological rather than built heritage in nature and is dealt with in the DBA prepared by BBHC. It will not be covered further in this heritage statement and it is not considered to be a potential built heritage receptor of impacts from the proposed development.

3.5.7 Park Street and Brandon Hill Conservation Area (Figure 15)

As previously noted, the site lies close to the southern boundary of the CA [Figure 15], overlooking the bottom of the slope of Brandon Hill. The Council's 2011 CACAMP highlights the importance of the local topography and the major contribution it makes to the local cityscape in describing its special interest and character as being:

'...broadly...defined in two parts: by its planned urban streets, dominated by high-quality townscape; and by its spacious and verdant character, which Brandon Hill is central to. Over-arching these two elements is a dramatic local topography, that marks the Conservation Area as one of Bristol's most well-known and interesting districts.'

[...]

The local topography, (which rises from approx. 8m at its lowest point, up to 30m at its summit) has played a significant part in shaping the development and land use of the area. It also contributes to the quantity and quality of views and panoramas that extend out of and into the Conservation Area.' [CACAMP; 4]

The CACAMP stresses the considerable value of CA views from and towards Brandon Hill. Since these are considered in some detail in section 5.3.3, they will not be described further here. However, at this juncture it is right both to stress that point, but also to note that the city views from the slopes of Brandon Hill have proved enduringly attractive to artists across the centuries. Numerous studies of these views from the late 18th and 19th centuries survive – a small number include part of the listed nos.1-14 Queen's Parade terrace, although the great majority were drawn or painted from positions further east around the slope closer to Great George Street, looking out south eastwards across the heart of the historic city. For example, the CACAMP illustrates (its Figure 7) one such watercolour by Samuel Anstie, painted in 1817. The CACAMP also emphasises the biodiversity value of Brandon Hill, its verdancy, and the importance to local character of its tranquility. It might also have noted the

contribution made to character by the historic use of Brandon Hill Grit in surrounding structures, including the boundary wall of the site itself.

The ICOMOS-derived hierarchy of significance provided in section 3.1.1 above differentiates between conservation areas containing ‘*important buildings*’ that contribute significantly to their historic character (which it identifies as being of medium significance) and those containing ‘*very important buildings*’ (which it considers, accordingly, to be of high significance). This approach is generally upheld by Planning Inspectors in planning appeals. Unquestionably, many of the buildings within the CA as a whole fall into the category of ‘very important’ buildings, as the high number of nationally designated buildings within the area demonstrates. The landscape is equally of considerable importance for the city of Bristol as a whole. In consequence, it is considered that the Conservation Area is a designated heritage asset of **high significance**.

3.5.8 College Green Conservation Area (Figure 15)

The boundary of College Green CA lies nearby to the east of the application site, running along St George’s Road. The Council’s conservation area appraisal for College Green CA, which was adopted in 2016, notes that the Conservation Area was first designated in May 1975 and its boundaries were reviewed and subject to some alteration in 2011, when the City Docks Conservation Area boundaries were extended along St Augustine’s Reach up to Cascade Steps.

The appraisal also notes that it is both physically and metaphorically at the heart of Bristol, taking in the medieval enclave centred on the Cathedral and important civic space of College Green, as well as the level area north of the Floating Harbour known as The Centre and the narrow lanes and traditional warehousing area of Denmark Street. The CA is one of the most historically significant parts of Bristol, rich in heritage assets of considerable significance, townscape quality and important public spaces, including College Green beside the Cathedral.

The CA appraisal divides the area into four distinct character areas:

- ***‘The Cathedral and College Green:*** *one of the city’s most important civic spaces dominated by Bristol Cathedral on the southern side and the Council House across its western edge. The route of College Green has a strong commercial frontage, which also contains the Lord Mayor’s Chapel.*
- ***College Square:*** *the area south of College Green with a sloping topography that falls towards Anchor Road and includes a quiet three-sided square.*
- ***Orchard Street environs:*** *the close-knit grid of formal 18th century terraces, and the later warehouses and small shops off the winding route, Denmark Street.*
- ***The Centre:*** *the level area that extends from the Floating Harbour up to Rupert Street, which outlines the extent of the historic dock which since culverting has left a large area of public realm’.*

Of these four character areas within the Conservation Area, the first has the closest geographical relationship to the application site. In that regard, the CA appraisal identifies the importance within the Cathedral and College Green character area of the views of Cabot Tower visible behind the Council

House in views across College Green and, separately, the view north along College Street towards Brunel House, the Brandon Hill escarpment, the cupola of St George's Church and the Wills Memorial Tower, but none of these include the listed buildings on Queen's Parade and York Place or the site.

As noted previously, the table in section 3.1.1 differentiates between conservation areas containing 'important buildings' that contribute significantly to their historic character (which it identifies as being of medium significance) and those containing 'very important buildings' (which it considers, accordingly, to be of high significance). College Green CA contains some of the most significant heritage assets in the City of Bristol and must be considered to be a designated heritage asset of **high significance**.

3.5.9 City Docks Conservation Area (Figure 15)

The boundary between Park Street and Brandon Hill and City Docks CAs lies close to the south of the application site in the middle of St George's Road at the bottom end of York Place. Bristol's City Docks were designated as a conservation area in September 1979, soon after they were closed to commercial shipping.

The CA covers a large and diverse area. The adopted 2011 Character Appraisal & Management Proposals for City Docks CA summarises its character and special interest as being:

'The City Docks Conservation Area covers the largest element of the waterways in the centre of Bristol. The topography of this area is formed by the river valley of two rivers - the Frome and the Avon – that have produced a fairly low lying level valley bottom with pronounced hillsides on both the northern and southern sides. The Floating Harbour and the tidal course of the New Cut is a precious and significant asset to Bristol.

The Floating Harbour is remarkable for its intimate relationship to the city. The port was never enclosed or separate; as a result, city streets opened onto wharfs and the working of the docks was carried out next to public highways. The physical proximity of the docks to the public realm has been critical in shaping Bristol's sense of place as a great maritime city.

The City Docks ceased to function as a commercial harbour in the mid 1970s and since that time the area has evolved into one of the most exciting districts in the city. Today the area boasts an impressive range of existing attractions, events and cultural facilities which sit adjacent to features of historical, architectural and industrial archaeological interest.

The City Docks Conservation Area is unique in terms of the special relationship between the water courses that run central to it: the Floating Harbour and the New Cut. The wide expanse of water and local topography also offer some of the best views in and out of Bristol, and to major city landmarks and features of interest.

The City Docks displays an amazing mix of land uses and building types. It is the retention and balance of domestic, commercial or industrial accommodation adjoining the harbour that has given the Conservation Area its interesting character and placed it ahead in the process of late 20th century urban renewal.

The character of the City Docks also lies in the quality and diversity of its local details - street furniture, dock fittings, surfaces, the remains of railway lines, and the buildings - once seen as dispensable, now finding lively and sustainable uses.'

The character and special interest of the CA can thus be summarised for the purposes of this statement as being:

- Its intimate relationship to the city, shaping Bristol's sense of place as a great maritime city;
- The evolution of the area since the Docks ceased to function as a commercial harbour into one of the most exciting districts in the city, with an impressive range of attractions, events and cultural facilities intermingled and interacting with assets of historical, architectural and industrial archaeological interest.
- The unique special relationship between the principal water courses that run through it - the Floating Harbour and the New Cut - offering some of the best views in and out of Bristol, and to major city landmarks and features of interest.
- A remarkable mix of land uses and building types, bringing a special character that has placed it ahead in the process of late 20th century urban renewal.
- The quality and diversity of local details - street furniture, dock fittings, surfaces, the remains of railway lines, and the buildings - once seen as dispensable, now finding lively and sustainable uses.

In identifying key CA views, the 2011 CAMP mentions panoramic views from Cumberland Road (P8), Prince St Bridge (P11), Prince's Wharf (P25), Coronation Road (P28, P30, and P32), and Camden Road (P31), which includes Brandon Hill and/or Cabot Tower at its summit, as well as long views from Wapping Wharf (L11) and Great Western/Wapping Dockyards (L14). There are also closer views from the south of Millennium Square that include both the Cathedral and Cabot Tower. However, the application site and its immediate environs do not form a pivotal component of any of these views from City Docks CA.

As noted previously, the table in section 3.1.1 differentiates between conservation areas containing 'important buildings' that contribute significantly to their historic character (which it identifies as being of medium significance) and those containing 'very important buildings' (which it considers, accordingly, to be of high significance). The majority of buildings, structures and other assets making a positive contribution to City Docks Conservation Area fall into the category of 'important' rather than 'very important' buildings, but countering that, due to topography, the CA's views are of particular importance and merit. It is considered that the City Docks CA is, for the purposes of this heritage statement, a designated heritage asset of **high significance**.

3.5.10 Bristol Cathedral

The Cathedral stands approximately 300m due east of the site in the College Green CA. It is included here as a potential receptor designated heritage asset because one oblique and partial glimpsed view of the Cathedral's towers can be gained across the site from a single position on Brandon Hill close to the site. In advance of the impact assessment section at the end of this report, it is considered that that view might be put at risk by the development proposals. The list entry for the Grade I listed

Cathedral, which was first designated in January 1959, is long and need not be quoted in full for the purposes of this statement. In short, its historical summary and description of the exterior read:

'Augustinian abbey, given cathedral rank by Henry VIII in 1542. St Augustine's Abbey was founded by Robert Fitzhardinge in 1140; Chapter House c1160 under Fitzhardinge, and parts of the cloister. Elder Lady Chapel 1220 under Abbot David; Berkeley Chapel 1300, Eastern Lady Chapel and chancel 1300-1330 under Abbot Knowle; Newton Chapel 1330-1340; crossing tower c1470-1515; north transept has Norman lower walls and was completed 1460-1480, south transept remodelled early C14; late C15 east walk of cloister, nave and west towers 1868-1877 by GE Street, the towers completed by JL Pearson in 1888.

Medieval work of Dundry and Felton limestone ashlar, rubble with ashlar dressings on the Elder Lady Chapel and transept, Bath ashlar limestone the rest.

PLAN: two-bay Elder Lady Chapel to the north of five-bay aisled chancel and presbytery, and a two-bay Eastern Lady Chapel; one-bay sacristy and two-bay Berkeley Chapel to the south, transepts project one bay and aisled nave of six bays; Chapter House south of the transept, the cloisters to south of the nave. Late Norman style Chapter House, Early English style Elder Lady Chapel, Decorated style chancel and Eastern Lady Chapel, and Middle Pointed Gothic Revival-style nave and west towers.

EXTERIOR: deep buttresses with finials to weathered tops; crenellated parapets with crocketed pinnacles. Angle buttresses with keeled shafts swallowed by head stops flank a nine-light east window of Lady Chapel with reticulated tracery, beneath a three-light mullion window with a label mould running into a string course, a central niche to parapet above and drip mould. The two-bay Lady Chapel has transomed four-light and three-light windows to north and south, the north aisle of five bays has transomed four-light windows, all with two alternating patterns of reticulated tracery. The single-storey Elder Lady Chapel is of four bays with three stepped lancet windows to each bay, and a c1275 Decorated east window of five lights; buttresses with gargoyles and tall diagonally-set pinnacles between a parapet of pierced trefoils, and a large square clasping buttress at the east end with a tall octagonal pinnacle.

The north transept has a six-light east window with rectilinear tracery, and a west window and door and a Geometrical six-light north window by Street with a three-light mullion window above covered by a clock, and a gabled, crenellated parapet with square, crenellated turrets. two-stage crossing tower with a north east stair turret, angle buttresses to the lower stage and diagonal ones to the belfry; five transomed two-light Perpendicular windows to each stage, louvred to the centre of the belfry, separated by thin buttresses with finials; weathering above, a blind arcade and a crenellated parapet with corner pinnacles.

The five-bay nave has four-light transomed windows with Geometrical tracery, separated by deep buttresses with pinnacles linked to those on the parapet by flying buttresses; above is a course of weathering and a parapet of pierced trefoils.

An ornate north porch with an arch of three orders below a statuary panel of the Adoration, with two-light transom lancets to each side and above; set-back buttresses with round, weathered tops, and attached shafts to canopied niches with statues. Inside, the porch has two bays, each with a bench and two niches styled after the Elder Lady Chapel, Purbeck marble shafts and trefoil tympana, joined by hoods with foliate stops; Purbeck marble shafts beneath a sexpartite vault, and lancet windows with quatrefoil heads in the north bay; the entrance arch is three orders with Purbeck marble shafts and a rose window in the tympanum, running foliage to the lintel and a two-leaf door with strap hinges.

The Berkeley Chapel has three-light windows to the east, a four-light south window and a rounded triangular window with three trefoil openings to the west; gabled buttresses with diagonally-set pinnacles and a crenellated parapet, and on the southwest corner an octagonal stair turret with a weathered top. Two mullion windows to the Sacristy, buttressed like the adjoining chapel. The Newton Chapel, in the angle against the south transept, has a five-light east window and a small mullion window just below a plain parapet, and a five-light south window. South transept has a four-light south window with reticulated tracery and a small C12 lancet above, a four-light west window by Street and a coped parapet.

The west front has two large flanking three-stage towers: the lower stage has a four-light window, the second-stage a blind arcade of four lancets with engaged shafts, with setback buttresses and a band of trefoil panels at the top; the belfry has two louvred two-light windows flanked by narrower blind two-light lancets, with crocketed gable hoods; below the top corners are statues in canopied niches, and broad octagonal gabled pinnacles; on the rear outer corners of the towers are octagonal stair turrets with panels on the belfry stage and gabled panels above it. Between the towers is a deep entrance arch of six orders with Purbeck marble colonnettes and enriched mouldings to the arch; in the tympanum of the arch is an empty niche, and a trumeau divides two square-headed doorways with C20 glazing; pinnaced buttresses either side, and a gabled hood with large crockets breaking a pierced and trefoil-headed parapet. Above this lower gable is a large rose window with a crocketed gable hood, fronting blind pointed-arched panels of two tiers forming a parapet, divided by diagonally-set buttresses with large finials.'

The Cathedral is a heritage asset of the highest importance in Bristol, and, beyond that, both regionally and nationally. While this is not a heritage statement or detailed assessment of significance for the Cathedral itself, it is important to note that it is of particularly special interest for its 14th century Decorated work, which was innovative and entirely original in its form. This included its aisled choir and eastern Lady Chapel. Together, the architectural historian, Nikolaus Pevsner termed these 'superior to anything else built in England and indeed in Europe at the same time', citing the hall church form created by the choir a '...superb synthesis of structural ingeniousness with spatial thrills'.

Externally, the Cathedral constitutes a key component of the most important longer distance views across the City, including those from adjoining Conservation Areas such as the City Docks CA and from landmark vantage points like Cabot Tower and beneath it, Brandon Hill. It forms a dominant built focal point within the view from Park Street across College Green, in which the silhouette of the Cathedral against the sky is unchallenged visually by any competing structure.

Using the DMRB hierarchy of significance provided in section 3.1.3, the Grade I Cathedral can be seen to be a designated heritage asset of **high significance**.

Despite its urban setting, affected by the noise and pressures of a modern city centre, the setting to the Cathedral makes a major contribution to its significance. To the north, the Cathedral faces on to College Green, an important and well-used civic space for public enjoyment, lined on one side by the Cathedral and on another by the Grade II* listed Council House by E Vincent Harris (it has already been noted that there is inter-visibility between Brandon Hill and College Green over the roof of the Council House). Together, these form a highly important tableau of high quality townscape/public realm and iconic architectural compositions at the bottom of Park Street, below the University's Wills Memorial Building. To the south, the Cathedral dominates the rising land at the edge of the former Canon's Marsh, overlooking the Floating Harbour and forming a landmark in medium and long distance views from the south. The positioning of the Cathedral at this point adds to its architectural dominance and spiritual symbolism, as a result.

3.5.11 St Mary's Redcliffe

The Church of St Mary Redcliffe stands beside today's Redcliffe Way in an eponymous historic suburb that lay close outside the medieval city walls. Again, it is included here as a potential receptor designated heritage asset because the spire of St Mary is visible in views across the site from the slope of Brandon Hill nearby and, in advance of the impact assessment section at the end of this report, it is considered some of these might be put at risk by the development proposals.

The list entry for the Grade I listed building, which was first designated in January 1959, is over-long to include, but its historical summary and description of its exterior read:

'Late C12 inner N porch; c1294 lower part of tower and W wall; c1325 outer N porch; c1335 S porch, transept and aisle and upper tower; mid C14 nave, N aisle, transept and chancel; mid C15 E bay of Lady Chapel and library; spire damaged 1446 and rebuilt 1872; restoration by G Godwin 1846-72; undercroft by G Oatley 1941. Limestone ashlar and leaded roof. PLAN: fully aisled cruciform plan with E Lady Chapel, N library, hexagonal N porch, S porch and W tower. Early English Gothic inner N porch and lower tower and W end, Decorated Gothic outer N porch, Perpendicular Gothic the rest. EXTERIOR: Lady Chapel: shallow gabled E end with a parapet of half-blind trefoils, containing a 6-light E window with panel tracery in an almost flat-sided arch, flanked by angle buttresses, with the triple plinths that run round the whole building except the W end; the 2-bay N elevation is divided by an octagonal 3-stage turret with cinquefoil panels and a crocketed ogee dome with an elaborate finial, has C15 E bay with a 4-light, 2-centred arched window, above a wide 4-centred arched doorway, and C14 W bay with a 5-light window in a flat-sided arch, the E light concealed by a projecting buttress, with pierced quatrefoils in the spandrels above. Chancel: E gable has a large 7-light window with alternate tracery, unpanelled above, with buttresses to thin crocketed pinnacles. Apart from the S transept, all the aisles have half-blind quatrefoil parapets, divided by deep buttresses with water tables which rise above the parapets, with richly crocketed pinnacles, and flying buttresses to the clerestory; above the clerestory is a parapet of open cusped triangles with thin crocketed pinnacles over the flying buttresses; chancel aisles of 4 bays, transept of 2 bays and nave of 3, each of 4-light windows under flat-sided arches;

the aisle gables have rounded-arched windows with 4 lights; the clerestory has tall 6-light windows with alternate tracery, and Perpendicular panelled spandrels to the 5-bay chancel, 3-bay transept and 5-bay nave. The N end of the transept has a tall, narrow window divided by Y-tracery and 2 transoms, with reticulated tracery in the arch head and below the transoms, flanking buttresses and panelling up to the shallow parapet. Filling 2 chancel bays and 1 bay of the N transept, the 2-storey library has mullioned windows with trefoil heads, transomed on the E second-floor, and a wide chimney breast to the N side. Crypt has 2-light windows in flat-sided arches that cut the plinth to both sides of the library and the 3 sides of the N transept. The much-restored 3-storey c1325 outer N porch is hexagonal in plan with 5-sided turret buttresses to square pinnacles: the main doorway has a cinquefoil-arch in a frame of 3 richly carved reverse-cinquefoil orders, with a restored door with scrolled strap hinges; smaller but similarly enriched E and W doorways have crocketed hoods, carved tympana, attached, diagonally-set steep gable pinnacles with rich finials either side, and doors with scrolled strap hinges; the buttresses have niches on plinths with good carved figures, nodding cusped ogee canopies and crenellated hoods; 4 also to each face of the ground and first floors, in front of 3-light first-floor windows with reticulated tracery; second-floor has 2 plain 4-light mullion windows below a parapet of open quatrefoils; SE octagonal stair turret with niches. Inside, the 4 sides have arcades of 4 cinquefoil-headed arches and a frieze of heads and fleurons, below a C20 concrete remodelling of the second storey; the SW side opens back to a small chamber; the arch to the inner porch has side ogee niches with plinths supported by fine human-faced beasts, and has a 2-light plate tracery window above. The doorway from the inner porch to the church has a cusped cinquefoil arch with hollow moulding with square flowers and a crocketed ogee hood, and canopied niches on angel corbels to the sides and above; arcades of 5 deeply-moulded lancets on Purbeck marble shafts and stiff leaf capitals to the sides, and semicircular quadripartite vault; the arch to the outer porch is of 5 orders with Purbeck marble shafts and stiff leaf capitals. To the N extends the 1941 undercroft with a central flight of steps up, sides with 3 plinth mouldings and triple stepped lancet windows to the E and W. The 3-stage tower has angle buttresses and an octagonal spire: 3-light N and 4-light W windows have Geometrical intersecting tracery to the C13 bottom stage, below an arcade of trefoil-headed niches with stiff-leaf capitals and gable hoods containing C19 statues of the Apostles; the wide buttresses have bowtell mouldings to the corners and 2 niches one above the other with crocketed hoods to the centres of projecting trefoil heads; a band of quatrefoil panels runs round the tower below the elaborate C14 upper stages, 3 arches with Y-tracery in gable hoods, the middle one to the N glazed above a clock; similar arches to the buttresses, with good animal and human hood stops. The belfry has 3 tall louvred cinquefoil-headed lights separated by narrow blind arches, all with crocketed ogee hoods and ball flowers; cinquefoil-headed panels to the tops of the buttresses, which end in crocketed pyramids in front of a parapet of open triangles with gargoyles, and tall octagonal panelled pinnacles inside the parapet; 3-stage spire with flowered ribs divided by bands of traceried panels, with cross-window lucarnes with ogee heads to the principal faces at the base and middle, and a foliated capstone. The S elevation differs from the N in the Chancel aisle doorway beneath the transom in the bay second from the E, which has 3 gable hoods, taller in the middle, with blind tracery and crocketed pinnacles, above a depressed-ogee doorway, and in the mid C14 S transept: this has gabled buttresses and unsupported flying buttresses with crockets, and is unpanelled above the clerestory windows, which have a central arch of 3 lights surrounded by a band of glazed quatrefoils. 2-storey S porch c1335 has a shallow gable and angle

buttresses with richly crocketed tops and pinnacles, a 2-centred arch with open cusping, 2 orders with small foliate capitals and an ogee hood, flanked by niches with openwork cusped heads and hoods and crocketed pinnacles; above is a central statue niche with narrow windows either side with steep, gabled heads on shoulders, crocketed gable hoods, and outer gable hood panels, separated by attached pinnacles; SE octagonal stair turret. W elevation is 2 bays of cinquefoil-headed cross windows blind below the transom; inside, the church entrance is the same as that of the porch, the sides have important early 4-centred arches with mullions to the arch and a central canopied niche, unrelated to the windows outside, and a lierne vaulted roof as the Lady Chapel E bay. Early C13 W nave gable has a weathered plinth, a renewed early C14 deeply splayed doorway with a cusped arch and a 2-leaf ridged door, and either side, slender attached pinnacles linked to larger attached diagonal buttresses by flying buttresses in relief; W window has 5 lights with ogee heads, bowtell mouldings with small capitals between the lights, and a traceried transom; the top of the gable is Perpendicular, panelled with a large octagonal pinnacle to the S stair turret; S aisle has a restored 4-light window with intersecting tracery.'

As a whole, the building's significance is extremely rich and varied. Inevitably, one considerable segment of its significance is bound up with its sacred use, symbolism, and its historic importance to the local community. Architecturally, inter alia, Gomme Jenner and Little (1979) describe it as 'England's finest medieval vaulted parish church' with lierne vaulting of 'splendour and complexity' and they reflect on its 'splendid early Perpendicular' nave. More holistically, as Foyle observes in his 2004 'Bristol: Pevsner Architectural Guide', Nikolaus Pevsner remarked that 'aesthetically there is no other [English parish church] example "so frankly endeavouring to be a cathedral"'.

In terms of this heritage statement, St Mary Redcliffe is important as being a major landmark structure within the cityscape of Bristol. Views to (and to a lesser degree, from) the church are of fundamental importance.

Based on the hierarchy of significance provided in Table 1 at section 3.1.1 above, St Mary Redcliffe must be considered to be a designated heritage asset of **high significance**.

3.5.12 Cabot Tower

The list entry for the Grade II listed Cabot Tower, which was first designated in March 1977, reads:

'Tower. 1897-8. By WV Gough. Sneaked red sandstone rubble with limestone dressings. Tudor Gothic Revival style. Square 2-stage tower has diagonal buttresses with octagonal finials, a weathered plinth, lower band of square panels, diminishing bands of ashlar to the lower stage, a middle band of pointed panels, and machicolated cornice with a pierced balustrade. The doorway in the N side has a moulded surround and plain door, below a 2-centre arched panel with a gabled label, crockets and finial, containing the city arms, flanked by attached columns with heraldic beasts on top. Similar panels with various arms to the other 3 sides. Bowed balconies to the second stage have moulded bases and pierced balustrades, to open 2-centre arches with gabled hoods like the doorway, and tall flanking 1/2 round attached shafts. Elaborate ashlar octagonal spirelet on top, with octagonal side finials linked to the buttress finials by flying buttresses, and a

weathered top with ball finial and a carved figure. The faces have openings as the balconies with wrought-iron overthrow arches to each. Small quatrefoil windows mark the progress of the stairs. INTERIOR not inspected. HISTORICAL NOTE: built to commemorate the fourth centenary of Cabot's voyage..'

Cabot Tower is a prominent and important historic landmark, built on the summit of Brandon Hill, and visible in key panoramic, long, and glimpsed views from many parts of the city. It is located approximately 285m from the application site, well outside its immediate area. While the development proposal for the site cannot affect the significance of the Tower in any other way, it is possible that it might affect views to or from the Tower and it is for that reason that Cabot Tower is included in this identification of potential receptor assets.

Using the DMRB hierarchy of significance provided in section 3.1.1, and using professional judgement to reflect the considerable visibility and iconic status of the heritage asset, Cabot Tower is found to be a designated heritage asset of **medium to high significance**.

3.6 Non-designated heritage assets within the wider environs of the site

3.6.1 Introduction

Map 6 of the CACAMP and HER information on the Council's Know Your Place website confirm that there are four built non-designated heritage assets on the Bristol Local List in the environs of the application site beyond its red line boundary [Figure 18] that need to be considered as potential receptors of heritage impacts from the proposed development. Careful site examination indicates that two of these can be excluded as being potential receptors of impacts from the development proposals due to their positioning in the local topography and comprehensive shielding by surrounding townscape. The remaining two, which do need to be considered as potential receptors of impacts are St George Church of England Primary School on Queen's Parade and St George's Court, former Infant School, on St George's Road.

3.6.2 St George Church of England Primary School, Queen's Parade (Figure 18; 1)

Built in the first half of the 1850s (prior to Ashmead's map of 1855) on the north side of Queen's Parade in local grey Pennant sandstone, the school building is identified in the Council's CACAMP for Park Street and Brandon Hill CA (its section 6.3.3) as a 'Community & Cultural landmark feature'. These are defined as being '*buildings that do not necessarily stand out physically, though function as a hub or community focus and are well-known and recognised by local residents*'. The building is also entered on the Bristol Local List, confirming it is regarded as a non-designated heritage asset.

The significance of the school building can be summarised as deriving from its distinctive architectural appearance as an educational building in the local streetscape and in views from Brandon Hill and along Queen's Parade, its materiality, and its importance to the local community and related associational value over roughly 170 years. On these grounds and also using the table in section 3.1.1,



FIGURE 18: BUILDINGS ON THE LOCAL LIST IN THE VICINITY OF THE SITE ((©BRISTOL CITY COUNCIL/KYP; ORDNANCE SURVEY PMCL 100061726)

it is a non-designated heritage asset of low significance.

3.6.3 St George's Court, St George's Road (Figure 18; 2)

St George's Court to the south of the site on St George's Road (partially shown in Figure 26) was formerly St George's Infants School, before becoming St George's Church Hall. On Ashmead's 1855 map, its site is occupied by four houses, but by the time survey work was conducted for his 1874 map the Infants School had been built. As the DBA notes, an inscribed stone marking the building's refurbishment by Armada Properties in 1990 incorrectly ascribes its construction to 1890, when the year when the Mission chapel was built on the application site. This error is repeated on the community layer entry on the Council's Know Your Place website.

The significance of the former school building, now in commercial use, can be summarised as deriving from its distinctive architectural appearance as a former educational building in the local streetscape, its materiality using local stone, and its importance to the local community for its associational value as a school educating local children. On these grounds and also using the table in section 3.1.1, it is a non-designated heritage asset of low significance.

4 HERITAGE LEGISLATION AND POLICY CONTEXT

4.1 National legislation and policy context

In England today, Government policy is framed around the principle that the care and conservation of individual heritage assets and the wider historic environment must involve:

‘Managing change...in ways that will best sustain...heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations’

[English Heritage (2008) *Conservation Principles*]

Accordingly, in the Ministerial Foreword of the original edition of the NPPF, the Government stated that:

‘Sustainable development is about change for the better, and not only in our built environment. Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.’

In terms of legislation, Section 66 of the Planning (Listed Buildings and Conservation Area Act) 1990 states that:

‘...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority...shall have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses’.

Section 72 of the same Act requires that requires that, in a conservation area, *‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’.*

The crucial point that is made forcefully in the NPPF [paragraphs 7-10] is that, to be sustainable, development must consider and involve the protection and enhancement of our natural, built and historic environment.

Of particular significance are Government policies for the historic environment set out in paragraphs 197-203 and 205-207 of the NPPF which variously require the local planning authority in determining applications for development to consider:

- *‘The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and,*
- *The desirability of new development making a positive contribution to local character and distinctiveness [paragraph 197];*

while dictating that:

- *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 [paragraph 199];*
- *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
 - a. *Grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
 - b. *Assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional [paragraph 200];*
- *Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss...[paragraph 201];*
- *Where a development proposal will 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 including, where appropriate, securing its optimum viable use [paragraph 202];*
- *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset [paragraph 203];*
- *Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and 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 the asset (or which better reveal its significance) should be treated favourably [paragraph 207].*

4.2 Local policy context

In addition to these national policies, in terms of heritage, the Council's own policies within its adopted Core Strategy, contain a single specific 'umbrella' for conservation and the historic environment (BCS22), requiring that:

'Development proposals will safeguard or enhance heritage assets and the character and setting of areas of acknowledged importance including:

- *Scheduled ancient monuments;*
- *Historic buildings both nationally and locally listed;*
- *Historic parks and gardens both nationally and locally listed;*
- *Conservation areas;*
- *Archaeological remains’.*

Additionally, Policy BCS21 relating to the quality of urban design requires that:

‘New development in Bristol should deliver high quality urban design. Development in Bristol will be expected to:

- *Contribute positively to an area’s character and identity, creating or reinforcing local distinctiveness.*
- *Promote accessibility and permeability by creating places that connect with each other and are easy to move through.*
- *Promote legibility through the provision of recognisable and understandable places, routes, intersections and points of reference.*
- *Deliver a coherently structured, integrated and efficient built form that clearly defines public and private space.*
- *Deliver a safe, healthy, attractive, usable, durable and well-managed built environment comprising high quality inclusive buildings and spaces that integrate green infrastructure.*
- *Create a multi-functional, lively and well-maintained public realm that integrates different modes of transport, parking and servicing.*
- *Enable the delivery of permanent and temporary public art.*
- *Safeguard the amenity of existing development and create a high-quality environment for future occupiers.*
- *Promote diversity and choice through the delivery of a balanced mix of compatible buildings and uses.*
- *Create buildings and spaces that are adaptable to changing social, technological, economic and environmental conditions’.*

A number of these requirements – but perhaps especially the first five and the last bullets - are of key importance to the development of the application site.

The core strategy is supported by a set of Development Management policies which help to ensure new development is compatible with the core planning principles set out in the National Planning Policy Framework. Adopted in 2014, the Site Allocations and Development Management Policies’ Policy DM31 on ‘Heritage Assets’ states:

‘General principles

Development that has an impact upon a heritage asset will be expected to conserve and, where appropriate, enhance the asset or its setting.

Archaeology:

Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ. In those cases where this is not justifiable or feasible, provision should be made for excavation and record with an appropriate assessment and evaluation. The appropriate publication/curation of findings will be expected.

Listed Buildings:

Alterations, extensions or changes of use to listed buildings, or development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

Conservation Areas:

Development within or which would affect the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.

Registered Historic Parks and Gardens:

Development will be expected to have no adverse impact on the design, character, appearance or settings of registered historic parks and gardens and to safeguard those features which form an integral part of their character and appearance.

Locally important heritage assets:

Proposals affecting locally important heritage assets should ensure they are conserved having regard to their significance and the degree of any harm or loss of significance.

Understanding the asset

Development proposals that would affect heritage assets will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would conserve and, where appropriate, enhance that significance.

Conserving heritage assets

Where a proposal would affect the significance of a heritage asset, including a locally listed heritage asset, or its wider historic setting, the applicant will be expected to:

- i. Demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and*
- ii. Demonstrate that the works proposed are the minimum required to secure the long term use of the asset; and*
- iii. Demonstrate how those features of a heritage asset that contribute to its historical, archaeological, social, artistic or architectural interest will be retained; and*

iv. Demonstrate how the local character of the area will be respected.

Recording the asset

Where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to:

i. Instigate a programme of recording of that asset; and

ii. Ensure the publication of that record in an appropriate form.

Energy efficiency measures and renewables

The installation of energy efficiency measures and micro-renewables in historic buildings (including listed buildings) and in conservation areas will be permitted, provided that the works are the minimum required to achieve the energy efficiency improvements and do not conflict with the general principles described above, prioritising low-impact measures over invasive measures.'

5 ASSESSMENT OF POTENTIAL IMPACTS

5.1 Introduction and general observations

As has been noted at the start of this statement, it has been prepared to comply with paragraph 194 of the NPPF, which requires an applicant whose proposals may affect one or more heritage assets *‘to describe the significance of any heritage assets affected, including any contribution made by their setting’* to a level of detail that is *‘sufficient to understand the potential impact of the proposal on their significance’*. This concluding section of the statement reviews likely impacts on relevant heritage assets in the light of the foregoing analysis and findings

It has already been mentioned in section 3.1.4 that impacts – whether beneficial or adverse – that might affect the significance of a heritage asset will either be:

- Direct physical impacts on its built fabric or character; or,
- Indirect impacts on the contribution made by its setting to its significance.

Finally, as a general principle, in NPPF terms, adverse effects resulting from any development proposal – that is, harm - can be considered to be a continuum, with ‘substantial harm’ only occurring at its very highest end and ‘less than substantial’ harm occupying the whole of the remainder of the continuum from the most minimal harm through to the threshold with ‘substantial harm’ where significance is almost completely vitiated.

5.2 Potential receptors of impacts

The heritage assets that may be affected by the development proposal have been identified in section 3 of this heritage statement as being:

Designated heritage assets within or including the site

- None

Non-designated heritage assets within or including the site

- i) Former Mission Chapel/Church of the Good Shepherd, York Place
- ii) Perimeter boundary wall to site

Designated assets within the wider environs of the site

- iii) 1-14 Queen’s Parade [GII listed]
- iv) 8-11 York Place [GII listed]
- v) 3-7 York Place and 15 Queen’s Parade [GII listed]
- vi) 16, 17 and 18 Queen’s Parade [GII listed]

- vii) Park Street and Brandon Hill CA
- viii) College Green CA
- ix) City Docks CA
- x) Bristol Cathedral [GI listed]
- xi) Church of St Mary Redcliffe [GI listed]
- xii) Cabot Tower [GII listed]

Non-designated assets within the wider environs of the site

- xiii) St George Church of England Primary School, Queen's Parade
- xiv) St George's Court, former Infant School, St George's Road

These are considered to be the potential built heritage receptors of impacts from the proposed development of the application site. It is worth stressing again that the significance of all but one of these potential receptors, as heritage assets in the wider environs of the application site, can only be impacted upon *indirectly* by the effects of development on the contribution made by setting to that significance, as they lie outside the application site's redline boundary. The one exception is the former Mission Chapel/Church of the Good Shepherd within the site, which can receive *direct* impacts from the development proposals.

5.3 Assessment of potential heritage impacts

5.3.1 Introduction

In section 5.1 above, it is mentioned that the assessment of harm caused to the significance of heritage assets in this combined heritage and archaeology statement would be based on the notion that harm can be seen as a continuum, with substantial harm only occurring at its very highest end and less than substantial harm occupying the whole of the remainder. This approach derives from the principles set down as national policy in the NPPF.

The NPPF's approach to negative impacts on designated heritage assets (referred to as 'harm') revolves around an undefined threshold between 'substantial' and 'less than substantial' harm. Although the term 'substantial harm' is neither defined in the NPPF nor in related guidance, the Planning Practice Guidance (2021) for Conserving and Enhancing the Historic Environment advises:

'In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.'

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or

conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.'

This carefully worded guidance reflects in part the principal case law to date that touched upon the definition of substantial harm (*Bedford Borough Council v Secretary of State for Communities and Local Government*, 2013). This related to a judicial review of a planning appeal. Accordingly, its findings in terms of an absolute definition are to a degree ambiguous, as that was not the issue at hand. The case was about process, not fact. However, the judgement is of importance for the light it sheds on an acceptable approach to defining 'substantial harm', which was summed up as follows:

'What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.'

Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced.'

Since then, relevant case law has focused to a large part on addressing the matter of achieving an appropriate balance between competing interests in circumstances where the level of harm to the significance of a heritage asset is likely to be less than substantial. In the *Barnwell Manor* case [SDDC CD17 *Barnwell Manor Wind Energy Ltd v. East Northamptonshire District Council* [2014] EWCA 137] it was found that '*less than substantial harm does not equate to a less than substantial planning objection*'. The judgement emphasised the need to have special regard to impacts on the setting of designated heritage assets and that '*there is a need to give considerable importance and weight to any harm...when carrying out the planning balance*'.

Also in 2014, the *Forge Field* ruling [R (*Forge Field Society*) v *Sevenoaks District Council & Others* [2014] EWHC 1895 (Admin)] reiterated *Barnwell Manor*'s approach, finding that the statutory duty imposed under section 66 of the Listed Buildings and Conservation Areas Act 1990 to have special regard to the desirability of preserving listed buildings and their settings requires that considerable weight must be accorded to any harm to listed buildings or their settings. The judgement concluded:

'The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the right balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation...'

As *Forge Field* noted, despite this statutory presumption, there is a balance to be considered. In the *Razor's Farm* recovered appeal decision in September 2014 [APP/H1705/A/13/2205929], alluding to *Barnwell Manor*, the Secretary of State noted that '*an adverse impact [on significance]...is one factor that attracts considerable importance and weight in the balancing exercise. However, it is important*

to acknowledge that considerable importance and weight is not synonymous with overriding importance and weight'.

Based on the foregoing, diagrammatically, the sliding scale of harm can be illustrated as shown in Figure 19.

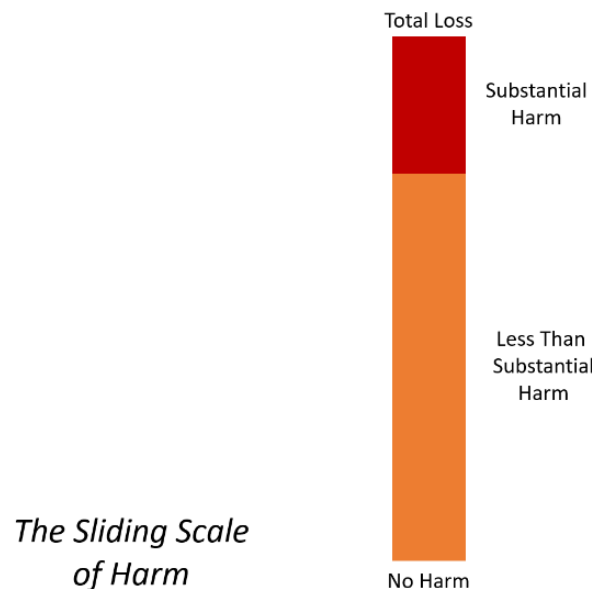


FIGURE 19: ILLUSTRATION OF THE CONCEPT OF HARM BEING A SLIDING SCALE WITH A THRESHOLD AT HIGH LEVEL ALONG THE SCALE BETWEEN THE NPPF CATEGORIES OF 'LESS THAN SUBSTANTIAL HARM' AND 'SUBSTANTIAL HARM'

In this statement, in reaching an assessment on any harm, the 'less than substantial' continuum/sliding scale will be subdivided into notional bands of harm – starting at the lower end with 'minor' harm, then 'moderate', and finally 'major', before reaching the upper threshold with 'substantial harm' – each band still being a gradient and with no hard dividing lines between them.

Finally, in this necessarily partial review of key case law relating to harm to the significance of heritage assets, it is useful to note the Secretary of State's agreement in 2020 with the findings and recommendations of the Planning Inspector in the called-in *Citroen Site* decision [ref: 3226914 - 10 September 2020], which placed renewed emphasis on the approach to applying heritage policies, including those relating to significance, in heritage impact assessments. The *Citroen* decision follows the line of the NPPF that a heritage asset's significance is made up of two components: the heritage values enshrined in the asset itself, including, potentially, attributes relating to its intrinsic character; and a secondary component of significance that derives from its setting – that is, the contribution made by the setting to significance. Building from that, and as discussed already in this report, the decision considered there are two possible types of impacts from a development proposal – direct impacts affecting the asset's built fabric or character and indirect impacts affecting the contribution made by its setting to its significance. The *Citroen* Planning Inspector specifically considered the nature of less than substantial harm, referring to it as '*a sliding scale, spectrum or gradient from (at the*

bottom) the merest trace of harm, to (at the top) a very significant degree of harm a touch below what would fall within the substantial category of harm', as has been illustrated above.

Pulling these matters together, and given the definition of substantial harm from *Bedford, Citroen* reached two important conclusions about indirect harm caused to an asset's significance by development within its setting – namely:

- *'It is clear that an asset would have to derive a great deal of its significance from its setting in order for change in its setting to cause it substantial harm'*
- *'...Assets rich in significance [in the case of Citroen, an important conservation area] are inherently more robust. That is not to say that harm to one aspect is unimportant; but it does indicate that with such assets it takes harm to multiple aspects of significance for harm to be pitched high up the less than substantial scale'.*

The Planning Inspector in *Citroen* also considered the assessment of cumulative harm in HIAs (that is, whether changes resulting from a development proposal (which could be direct or indirect impacts) compound or further exacerbate pre-existing harm to a receptor asset's significance. Noting that *'...existing harm should never be used to justify additional harm'*, he concluded that:

'...in very simple terms, the analysis is of incremental further harm caused by the scheme. That takes into account what harm has already been caused as the baseline. However, the harm attributable to the scheme under consideration is not the total harm. It is the degree of additional harm. Where this matters is when there is a very large degree of existing harm, and a further straw may break the camel's back... It is also very important to be clear that analysing the further incremental degree of harm is not a backdoor route to large-scale harm through multiple small increments. The exercise in every case takes as the baseline the latest cumulative baseline. Once any particular tipping point is reached, the next increment may be judged unacceptable.'

5.3.2 Summary of the development proposals

The development proposals [Figures 20, 21, 22, 23] are described in detail within the submitted drawings and the related Design and Access Statement [DAS]. The DAS explains (its page 14) that:

'Driven by the appearance of the grade II listed Georgian townhouses known as 1-14 Queen's Parade, the residential proposals are designed as two new bays to provide a fitting addition to the Queen's Parade street scene, with matching proportions and fenestration.

Key terrace features such as sash windows, large recessed entrance doors, fanlights and dressed stone detailing have been incorporated into the design to make the new block appear as if it was part of the original terrace. The lowered parapet and ridge heights aligns with the pattern along the street, with changes in level to suit the road as it slopes down toward York Place.

The existing stone boundary wall is largely retained, from the corner of Queen's Parade down along York Place. Demolished sections of the existing wall will be set aside to be reused within the site as new low boundary walls to the private gardens of apartments 1-3.'



FIGURE 20: PROPOSED SITE PLAN (©ANGUS MEEK ARCHITECTS)



01 - QUEEN'S PARADE ELEVATION



02 - REAR ELEVATION

FIGURE 21: PROPOSED FRONT (TOP) AND REAR (BOTTOM) ELEVATIONS (©ANGUS MEEK ARCHITECTS)



FIGURE 22: YORK PLACE ELEVATION/SECTION (©ANGUS MEEK ARCHITECTS)



FIGURE 23: PROPOSAL FOR CONVERSION OF THE FORMER CHAPEL (©ANGUS MEEK ARCHITECTS)

5.3.3 Assessment of heritage impacts

i) Former Mission Chapel/Church of the Good Shepherd, York Place

Externally, the conversion of the non-designated former chapel on the site to provide three commercial units involves its repair, adaptation of its roof slopes with insertion of conservation rooflights to its more visible north facing slope and dormer window structures to its south facing slope,

and changes to openings on its north and south elevations. Internally, the proposed use requires subdivision of the internal space with removal of a later partition in the main space.

The conversion will provide a secure ongoing use for the redundant chapel, ensuring it is retained as part of the York Place streetscape, with limited (although some) physical change being evident from the public domain.

Paragraph 203 of the NPPF states that:

‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’

The visible changes to the former chapel from the road should not harm appreciation of its original use. The conversion will safeguard the presence of the unlisted building of merit in the CA. On balance, the proposed changes are regarded as likely to have no effect on the assessed low significance of the former chapel as a non-designated heritage asset.

ii) Perimeter boundary wall to site

The nature, character and heritage value of the boundary wall and its relationship with the garden walls behind Grade II listed 1-14 Queen’s Parade have been explored already above. The development proposals for the site will involve demolition of the Queen’s Parade length of the historic wall, including the seemingly original blocked pedestrian entrance against the corner of no.14 Queen’s Parade. The DAS states that the material from the demolished sections of the existing wall will be salvaged and reused on site as new low boundary walls to the proposed private gardens of the new apartments 1-3. A short section of the wall along Queen’s Parade will be rebuilt and the York Place length of the boundary wall will be repaired and retained in situ, with some adaptation around the existing opening into the former school yard.

The loss of the Queen’s Parade length of the boundary wall, including the former opening, will inevitably cause harm to the low significance of the non-designated asset (as well as to its contribution to the significance of the CA, which will be considered in the relevant subsection below). Based on the discussion regarding the sliding scale of harm and relevant case law set out in section 5.3.1 above, it is considered that the proposals will result in moderate less than substantial harm to that low significance. As previously noted, NPPF Paragraph 203 requires that *‘a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset’*. The harm thus needs to be considered in terms of the overall effects of the application and its delivery of wider public benefits.

iii) 1-14 Queen’s Parade

The significance of the listed terrace comprising nos.1-14 has been described in section 3.5.2 above. It was found there to be a designated heritage asset of medium significance.

The site lies in the immediate setting of the listed building. However, the application proposals will physically affect the listed structure, since they involve demolition of the attached classroom structure and the boundary wall that abuts the terrace and extension of the terrace with a new residential apartment structure of similar form and appearance across the Queen's Parade frontage of the application site.

The proposals will extend the terrace in a manner that has not existed before, but which historically had been intended during its construction. Architecturally, the listed building's key attributes of significance will not be compromised – for example, the gable end wall of no.14 does not in itself contribute to the terrace's significance. The intactness (integrity) of the historic building will be retained, although the authenticity of the extended whole structure will be less easily appreciated by some in the future. That nonetheless, the proposed extension of the terrace has been carefully designed to respect and prevent competition with the listed building compositionally and in terms of its detailing, while the elevation of the new structure will be set back by 50mm to distinguish it from and subordinate it to the historic building.

The immediate setting of the listed building at its western end will be changed by the proposals, removing the 'missing tooth' gap in townscape that has existed for more than two centuries. Although a more restricted view down York Place will remain, this will limit immediate visual appreciation from the lower slope of Brandon Hill opposite of the terrace's raised location and the related interrelationship with the city beyond. Conversely, the proposed use and designed form for the site resolves future uncertainty over the now redundant historic gap site, providing a satisfactory, architecturally respectful, and appropriate residential development.

Overall and on balance, while the application involves a marked change to the historic terrace, this heritage statement finds that the significance of the listed building will not be adversely affected by the proposals. The development will have a neutral effect on the medium significance of the Grade II listed 1-14 Queen's Parade.

iv) 8-11 York Place and (v) 3-7 York Place and 15 Queen's Parade

The listed assets of 8-11 York Place and 3-7 York Place and 15 Queen's Parade have been combined here, as the same comments and conclusion applies for each. The significance of the two listed terraces has been described in sections 3.5.3 and 3.5.4 above. They were found there to be a designated heritage assets of medium significance.

8-11 York Place adjoins the application site on its south east boundary. At present, a redundant toilet block of the former school is attached to the listed terrace gable end wall, but that will be demolished as part of the proposals leaving the end of the terrace without attachment.

3-7 York Place and 15 Queen's Parade stands across York Place from the application site, with no.15 turning the corner on to Queen's Parade.

The site lies in the immediate setting of both designated assets and (apart from the removal of the toilet block already mentioned) any impacts from the proposals will arise indirectly through potential effects on the contribution made by that setting to their significance.

It must first be noted that, for the entire history of both assets, the site has always been relatively open, providing a greater sense of space and allowing (with the exception of no.15) a wider view up to the slope of Brandon Hill than would otherwise have been the case had the historical gap in built form in the townscape not existed. The proposals in the application will introduce a greater degree of enclosure within the setting of these listed terraces. However, the DAS makes clear that design development has led to the end bay of the new structure on the site being substantially reduced in scale to avoid dominance and overshadowing of the two listed buildings. The retention and conversion of the former chapel on site and the open spaces around it will also lessen the visual impact of the development on its neighbours.

It must be recognised that there is no automatic and inevitable linkage between change to the setting of a heritage asset and the causing of harm to significance. The current redundancy of the site and its non-designated chapel poses a threat to the setting of both listed terraces. On balance, the conclusion of this heritage statement is that, while the proposed development will change the setting of both listed buildings noticeably, it represents a good-neighbourly and respectful resolution to the site's redundancy, which will result in the medium significance of the two Grade II listed buildings being unaffected and unharmed.

vi) 16, 17 and 18 Queen's Parade

The significance of the listed terrace comprising nos.16-18 has been described in section 3.5.5 above. It was found there to be a designated heritage asset of medium significance

The listed terrace lies westwards along Queen's Parade from the application site. It does not overlook the site directly, but the two can be seen together in single views from the slope of Brandon Hill and along Queen's Parade [Figure 24].



FIGURE 24: CO-VISIBILITY OF THE SITE AND LISTED 16, 17 AND 18 QUEEN'S PARADE (ARROWED) IN LOCAL VIEWS

While the development will fill in the current gap in the local townscape and thus change the appearance of the wider setting of the listed terrace, the proposals will have a neutral effect on its medium significance.

vii) Park Street and Brandon Hill CA

The CA and its significance have been described already in section 3.5.7, where it is found to be a designated heritage asset of high significance. The site lies within the CA and impacts from its development could potentially directly affect the CA's significance.

The Council's 2011 CACAMP places considerable emphasis on the value and significance of CA views to and from Brandon Hill:

- The natural topography of the CA rapidly makes a 20 metre climb from its lowest point along St George's Road up to the summit of Brandon Hill. Brandon Hill is an important green space occupying the high ground overlooking the Cathedral and Canons Marsh. Its south-westerly aspect and steep slopes make it a pleasant and tranquil space to take in the views across the south of the city. Views into the CA from these points are also significant. [CACAMP 3.2.1]
- The topography and landscape setting of Park Street and Brandon Hill are important factors in its special interest. These allow extensive views into and out of the CA and contribute to the sense of its prominence in the context of the city. [CACAMP 3.2.4]
- Brandon Hill itself is one of Bristol's most prominent landscape features, further emphasised by Cabot Tower at its summit. The park is significant for its biodiversity value; its quality as a public green space in the heart of the city; the views that extend out from it; and for its historic and archaeological interest. [CACAMP 4.6 in summarising Brandon Hill's special interest]
- The spectacular city-wide views enjoyed from the Park Street & Brandon Hill CA are fundamental to its special interest. [CACAMP 6.2.1]
- The CA's elevated position on the escarpment that rises high above sea level affords it exceptional views across the City and beyond, while local and glimpsed views lead towards key landmarks or townscape features [CACAMP 6.2.2]
- Brandon Hill provides important views to the countryside of the Mendip and Bath hills. [CACAMP 6.2.3]
- From within the CA, Long Views are enjoyed to a number of Bristol's landmarks, including Bristol Cathedral, St Mary Redcliffe Church, and the SS Great Britain. [CACAMP 6.2.5]
- Brandon Hill, with Cabot Tower at its summit, and the Wills Memorial Tower are significant features picked out in many views into the CA. Views to these landmarks are clear from the City Docks, Victoria Park, Perrett's Park, Southville, Totterdown and Wells Road, Bedminster Down and Knowle. [CACAMP 6.2.6]
- Long views into and out of the CA are particularly threatened by any new developments and large roof forms that interrupt these views in or out, or that will obscure the famous Bristol landmarks. [CACAMP 6.2.7]
- Views of rear elevations are equally important, especially views from the public realm into green spaces, or views to building elevations. [CACAMP 6.2.9]

- [Glimpses] include...glimpses of rear elevations or more distant glimpsed views that include both front and rear elevations, the roofscape, and landscape beyond. [CACAMP 6.2.10]
- Preserving the setting and views out from, as well as views into the CA, is vital in protecting its character and significance. [CACAMP 6.2.11]
- Specifically in relation to Queen's Parade, the CACAMP identifies 'Superb views into Brandon Hill Park and towards the Floating Harbour' and the threat of 'New developments obscuring or undermining views from Queens Parade'. [CACAMP table on page 35]
- Views from Brandon Hill are probably the best and well-known in Bristol; similarly views to the park are a significant marker of Bristol's landscape. [CACAMP 7.1.5b]
- Finally, in relation to views, the CACAMP concludes that 'any remaining [infill] development should take into account the views from Brandon Hill and be of the highest quality in terms of materials, design interest, massing and scale. [CACAMP 9.10]'

The effects of the development proposals for the site on these views have been carefully assessed during design development and in preparing this heritage statement.

Firstly to repeat observations that have already been made earlier in this section:

- The immediate setting of the listed 1-14 Queen's Parade at its western end will be changed by the proposals, removing the 'missing tooth' gap in townscape that has existed for more than two centuries. Although a more restricted view down York Place will remain, this will limit immediate visual appreciation from the lower slope of Brandon Hill opposite of the historic terrace's raised location and the related interrelationship with the city beyond.
- For the entire history of the two listed terraces 8-11 York Place and 3-7 York Place and 15 Queen's Parade, the site has always been relatively open, providing a greater sense of space and allowing (with the exception of no.15) a wider view up to the slope of Brandon Hill than would otherwise have been the case had the historical gap in built form in the townscape not existed. The proposals in the application will introduce a greater degree of enclosure within the setting of these listed terraces.

At the present time the gap in the townscape represented by the application site in its historic and current form allows an arc of view from varied locations on paths on the slope of Brandon Hill looking out from the CA towards the east (highly restricted), south east, south, and south west (highly restricted) [Figures 2, 3, 17, 24, 25]. In these views, at various times it is possible to see and actively recognise glimpses of the spire of St Mary Redcliffe, the top of the Grade II listed brick chimney to the former leadworks in Canon's Marsh, the upper parts of the towers of Bristol Cathedral, and the distant hills.

Looking inwards into the CA and towards the site from publicly accessible vantage points to the south and south east, there is a single raking upward view from St George's Road which gives a sense of the openness of Brandon Hill above it and includes sight of mature trees beyond the site [Figure 26]. Otherwise, due to topography, orientation and the disposition of built townscape elements, there are



FIGURE 25: VIEW FROM BRANDON HILL LOOKING SOUTH EAST ACROSS THE SITE, INCLUDING VISIBILITY OF THE SPIRE OF ST MARY REDCLIFFE, THE TOP OF THE CANON'S MARSH LEADWORKS CHIMNEY (TO THE LEFT OF THE SPIRE) AND THE HILLS IN THE BACKGROUND



FIGURE 26: VIEW OVER SITE TO OPENNESS OF AND TREES ON BRANDON HILL FROM ST GEORGE'S ROAD

no direct key views of Brandon Hill that cross the site in this direction and could be affected by the development proposals.

In addition to observations made during several visits to the area in different weather conditions and times of the day, modelling of five views out from Brandon Hill paths has been undertaken to understand the effects of the development on CA views. While not verified visual images, these are sufficiently accurate to establish the likely impacts. The montage views [Figures 27, 28, 29, 30, 31] are illustrated here to include the proposed development with 80% density (in other words, the new build is shown with some translucency) to show whether key view components are obscured or will remain visible.

The process has demonstrated that around the section of hillslope closest to and overlooking the site up to and including the meeting of the two nearest public paths, once implemented the development proposals will result in some localized loss of visibility of the spire of St Mary Redcliffe. The one glimpsed view of the upper parts of the towers of the Cathedral from the lower (westward) path (see Figures 17, 29) will be lost. Generally, visibility of the hills beyond the city will remain unaffected. Moving away from the site towards the north and north west involves climbing upwards, rapidly diminishing any loss of heritage value in outward views from Brandon Hill.



FIGURE 27: MONTAGE VIEW FROM CLOSE TO THE JUNCTION OF TWO PATHS ON BRANDON HILL SHOWING THE CONTINUED VISIBILITY OF THE SPIRE OF ST MARY REDCLIFFE AND DISTANT HILLS



FIGURE 28: MONTAGE VIEW FROM LOWER DOWN THE HILLSLOPE THAN (27), FROM WHERE VISIBILITY OF THE SPIRE OF ST MARY REDCLIFFE WILL BE LOST FOLLOWING IMPLEMENTATION OF THE DEVELOPMENT PROPOSALS



FIGURE 29: LOWER STILL THAN (28), THE SINGLE GLIMPSED VIEW OF THE CATHEDRAL TOWERS WILL BE OBSCURED BY THE DEVELOPMENT



FIGURE 30: AT THE JUNCTION OF PATHS (NEAR TO (27)) THE SPIRE OF ST MARY REDCLIFFE AND THE LISTED LEADWORK'S CHINEY REMAIN VISIBLE (FOR THE SAME IMAGE WITHOUT MONTAGE, SEE (25))



FIGURE 31: THE EFFECT STEPPING BACK FROM (27) AND (30)

The foregoing analysis shows that some localised interruption of views of key landmarks and townscape features will result from the development. However, due to kinetic effect, from close by - and with the exception of the one oblique view of the upper parts of the Cathedral's towers – similar views of the same features in views will be retained. This effect will be most noticeable at lower levels on the hillslope in close proximity to the site. The effect drops away rapidly as the viewing point rises up the slope. The exceptional views out from the hill across the city to the hills beyond are largely unaffected.

The analysis also reveals that the important inward views to Brandon Hill and the CA mentioned in the CACAMP remain unaffected by the development. However, the one glimpsed view giving a sense of openness that is illustrated in Figure 25 will be reduced in its effect, although a relatively similar effect will still be obtained close by in looking up the length of York Place.

Finally in terms of impacts, as already noted, the proposals involve demolition of the Queen's Parade length of the distinctive historic stone and brick boundary wall of the site itself. This wall makes a strong positive contribution to character in immediate local views in the CA and its partial loss will inevitably result in some compromise to its character, despite the retention of the York Place section and a small area of reconstruction on its return on Queen's Road.

Overall, the effects of the development that have been discussed in this subsection will cause a level of less than substantial harm to the Park Street and Brandon Hill CA. Reviewing the CACAMP excerpts set out at the start of the subsection, the adverse effect will not be sufficient to harm the sense of the CA's prominence in the context of the city, but it will result in the localised loss of views that are important to the CA and which were undoubtedly valued and recorded in the late 18th and 19th centuries by artists and visiting literati.

On the other hand, as has already been pointed out, the development will secure the future and appropriate use of the now redundant site, removing the potential threat that it would otherwise represent to the character and appearance of the immediate part of the CA.

On balance, it is considered that the proposals will result in harm to the significance of the CA at the upper end of minor less than substantial harm, based on the sliding scale of harm and the subdivision of its less than substantial category into 'minor', 'moderate', and 'major', as described in section 5.3.1. This is an appropriate assessment of harm given that the CA is an asset (in the words of the Inspector in the *Citroen* case) '*rich in significance [in which] it takes harm to multiple aspects of significance for harm to be pitched high up the less than substantial scale*'. By far the greater part of the CA's significance will be unaffected by the development proposals.

viii) College Green CA

The significance of College Green CA has been described in section 3.5.8 above, where it is found to be a designated heritage asset of high significance. The site lies some distance outside the boundary of the CA and impacts from its development could only potentially indirectly affect the CA's significance through adverse effects on the contribution made to significance by setting.

The contextual inter-relationship between College Green CA and Park Street and Brandon Hill CA is implied (while being far from obvious and overt) in the vicinity of the application site by the one glimpsed and extremely partial view of the Cathedral's towers over the site that has already been considered. That view will be lost in the proposed development of the site.

Consideration has rightly been given in preparing this heritage statement as to whether that results in any harm being caused to College Green CA in which the Cathedral prominently stands. It has been concluded that implementation of the development will not in any realistic and practical way harm the contribution made by setting to the significance of College Green CA. The development will have a neutral effect on the CA's high significance.

ix) City Docks CA

The significance of City Docks CA has been described in section 3.5.9 above, where it is found to be a designated heritage asset of high significance. The site lies some distance outside the boundary of the CA and impacts from its development could only potentially indirectly affect the CA's significance through adverse effects on the contribution made to significance by setting.

The same argument set out for College Green CA in (viii) above applies to City Docks CA and the impact of the development on local views from the lower slope of Brandon Hill towards the CA and its key significance bearing attributes. It is concluded that the implementation of the development will not in any realistic and practical way harm the contribution made by setting to the significance of City Docks CA. The development will have a neutral effect on the CA's high significance.

x) Bristol Cathedral and xi) St Mary Redcliffe

The significance of Bristol Cathedral has been described in section 3.5.10 and that of St Mary Redcliffe in 3.5.11 above, where they have both been found to be designated heritage assets of high significance. The site lies a considerable distance from both, but as discussed already they are visible in views across the site from the slope of Brandon Hill which will be affected by implementation of the development proposals. The nature and extent of those effects on visibility of the assets individually have also been explained.

Consideration has again been given in preparing this heritage statement as to whether the effects of the development on appreciation of these designated assets in views results in any harm being caused to their significance, especially taking into account – as per the *Citroen* case – that these are assets that are extremely rich in significance. It has been concluded that implementation of the development will not in any realistic or practical way harm the significance of either asset. The development will have a neutral effect on the high significance of both Bristol Cathedral and St Mary Redcliffe.

xii) Cabot Tower

The significance of the listed Cabot Tower has been described in section 3.5.12 above. It was found there to be a designated heritage asset of medium to high significance. It is also noted there that the Tower is visible in key and glimpsed views from many parts of the city.

The Tower stands roughly 285m north of the application site at the top of Brandon Hill. Due to topography and tree cover, it is not visible from the site and the site is screened from clear view from the viewing platform at top of the Tower. Moreover, no view of the Tower is gained across the site from any publicly accessible location to its south. Accordingly, it is concluded that the development proposals will have a neutral effect on the significance of the Cabot Tower.

xiii) St George Church of England Primary School, Queen's Parade and xiv) St George's Court, former Infant School, St George's Road

The current Primary School and former Infants school have been entered on the Bristol Local List, as previously described. They are both non-designated heritage assets of low significance.

While the proposed development will be visible from both assets, it is considered that they are sufficiently detached from the site for the visual effects not to harm their significance. However, the significance of the two non-designated assets derives not just from architectural value, but also the community value of locally important educational premises. Consideration has been given in preparing this statement as to whether that component of significance will be harmed by the proposals. The educational use of the site has ceased and is unlikely to reoccur. Permanent redundancy is not tenable, meaning that some form of development must take place. The submitted application ensures the retention and conversion to a viable use of the former chapel/school building on the site and its surrounding open area, although the 1930s classroom will be demolished. By reusing the former chapel/school structure, the proposals will assist in preserving the educational linkage between the three sites/non-designated heritage assets. On that basis, it is concluded that the development proposals will not adversely affect the low significance of St George Church of England Primary School, Queen's Parade and St George's Court, former Infant School, St George's Road.

xv) Cumulative impact

Finally in terms of this assessment, consideration has been given to the possibility that – in the wording of the *Citroen* decision (see section 5.3.1 above) – the proposals contained in this application might represent '*a further straw [that] breaks the camel's back*' due to its incremental additional effect '*when there is a very large degree of existing harm*' from one or more other consented development schemes.

There are no other applications or outstanding consents that are likely to result - in combination with the current application - in a cumulative effect amounting to substantial harm to any heritage asset covered in this heritage statement.

5.4 Concluding justification for causing harm to significance

As noted in section 4, the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local planning authorities shall have special regard to the desirability of preserving listed buildings or their setting or any features of architectural or historic interest which they possess and also that they shall pay special attention to the desirability of preserving or enhancing the character or appearance

of conservation areas. Where harm occurs, the NPPF sets out the test whereby this must be justified. The Council's local plan policies, set out in section 4 above, reinforce that process.

The impact assessment has found that minor less than substantial harm would be caused by the development on the significance of the designated Park Street and Brandon Hill Conservation Area, while moderate less than substantial harm will result to the low significance of the non-designated perimeter boundary wall around the site.

Paragraph 202 of the NPPF requires that:

'Where a development proposal will 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 including, where appropriate, securing its optimum viable use.'

As previously noted, NPPF Paragraph 203 requires that *'a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.

Public benefits are usefully defined within the 2019 Planning Practice Guidance as follows:

Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit...

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.'*

The wider public benefits that will be delivered by the proposals within this application are considered as part of the planning balance within the Planning Statement accompanying the submission. However, it is important in closing to stress both that considerable weight must be accorded to any harm likely to be caused to designated heritage assets and that *'the provision of...open-market houses and the associated economic activity are very weighty matters in economic and social terms'*, as the 'Razor Farm' recovered appeal decision noted. In this instance, reuse of the application site including the non-designated former Mission chapel is an important objective that secures both the latter's long term conservation and ongoing protection of the character of the Park Street and Brandon Hill CA.

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