

**230385/F** Proposed renovation and adaptation of the existing Hereford Museum and Library to become a dedicated and enhanced facility for Herefordshire Museum Service and viable for the future. This would comprise a museum, education space, galleries, cafe, and staff facilities.

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### **Summary of comments**

#### **230386/L**

- i. **In its current form it is not possible to support the application in terms of the works to the fabric of the listed building and clarification and/or amendments are sought on several items as detailed in the full report.**
- ii. In summary the main concerns identified in respect of the listed building are;
  - The implications of the steelwork required to facilitate the additional floors has not been adequately addressed in the application in respect of the works required to the built fabric of the building. An assessment of the proposal and how it affects the listed building requires all the works proposed to the listed building to be identified in order that the works can be assessed. These details are required in order to consider the proposed steelwork as part of this application.
  - The Insulation details proposed and how they would affect features of architectural interest.
  - Some discrepancies between plans.
  - Some design changes especially the southern elevation.
- iii. The listed building consent application considers the works to the built fabric of the listed building, with the consideration of the proposal on the setting of other designated assets including the conservation area considered within the accompanying planning application 230385/F.
- iv. There is general support in principle for the renovation and expansion of the facilities currently offered by the museum to continue the use of this listed building as a museum serving the county.
- v. The degree of documentation that has accompanied the application is duly acknowledged and necessary given the constraints and designations affected by the proposal. However it is noted that reports have been prepared by different people whilst the scheme was evolving and noting that the scheme is subject to external funding in part, it is assumed that these are subject to time constraints which has been a consideration in the submission of the application. However this has led to some reports conflicting with other documentation, for example the roller shutter doors in the foyer being described as sliding doors in other documents, which require clarification. However the most obvious omission from the listed building consent application is the fact that the structural report dealing with the foundations and the steel supports and the information within appears to have been worked up at the same time as the other documents, and as such does not appear to have been replicated within any reports relating to the fabric of the listed building. The works identified within the

structural report should have been included within the listed building consent application in relevant and sufficient detail.

- vi. A full methodology statement relating to how the works identified by the structural report are to be incorporated into the listed building should have been provided. In addition, whilst there are several demolition plans for every floor and elevation, it is also noted that the lime plaster is to be removed, historic glazing, ceilings and floors and all these historic elements to be removed should also have been clearly identified ideally on a single document. Whereas the plans were submitted by room in addition to the demolition plans and as such the full extent of the removal of historic fabric proposed has not been considered in a single document.
- vii. Whilst noting the proposed insulation, I am also aware of other applications that have been considered by the Local Planning Authority where insulation is considered to compromise the historic fabric of the building. In order to be fair and consistent with other applications that have been considered, clarification and amended details are again requested.
- viii. Whilst noting that the building is aimed to be passivhaus standard, which will aim to combat energy use and as such the wider considerations of climate change, which is obviously supported, a consideration in respect of the historic fabric and the embedded carbon that is being lost, and subsequent disposal, and the product environmental footprint ( Life Cycle Assessment) of the new materials being introduced to the building is also a consideration on schemes of this size which was not readily identified in the application, but no doubt was considered as part of the considerations of retrofitting to passivhaus standard.

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- ix. **The proposal has been considered against NPPF and it cannot be concluded that the current proposal would not result in less than substantial harm to the setting of several listed buildings and the skyline and the conservation area. However taking into account the public benefits of enhanced facilities to a public museum, and policy HD2 of the Core Strategy, and the Draft Hereford Design Guide, amended plans are suggested as detailed in the full report to aid in the mitigation of the proposal.**
- x. In summary the main concerns are the height of the proposed extension especially the viewing beacon and the relative height of this structure on the city's skyline and how that impacts on the setting of listed buildings, taking into account our statutory duties, national policies and relevant guidance including the Hereford Design SPD.
- xi. The planning application considers the impact of the proposal on the setting of designated assets including adjacent listed buildings and the conservation area, the listed building consent application considers the works to the built fabric of the museum as a listed building, 230386/LF.
- xii. The building is a listed building adjacent to several other listed buildings and scheduled monuments prominently sited within the Central Conservation Area. In addition to the impact on the host listed building, the impact on the setting of other heritage designations is also a consideration and a statutory duty of the local authority under sections 66 and 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990. This statutory duty is

absorbed into the national Planning Policy Framework and repeated in Core Strategy Policies.

- xiii. The Visual Impact Assessment has been considered, in addition to the Archaeology and Heritage Desk based Assessment, which concluded that the impacts in terms of setting will be slight/negligible or minor. The weight of the impact is not concurred with, nevertheless this is not the weighting within National Planning Policy Framework. Case Law on the subject concluded that only the three graduations of harm in NPPF apply in heritage terms and even limited or negligible harm amounted to less than substantial harm. The judgement clarifies that this level of harm is sufficient to engage the heritage paragraphs within the NPPF.
- xiv. It is noted that there will be other considerations in addition to heritage and matters such as overlooking from the new windows and roof terrace, noise or light pollution from the terrace will be addressed by others and as such I have not provided comments on those items at this stage. However these less tangible aspects also form part of the consideration of the non visual setting of heritage assets and require due consideration as exhibited in recent case law. R. (on the application of Palmer) v Herefordshire Council, [2017] 1 W.L.R. 411 (2016).

## Full Consultation Response

### 1.1 Policy and Documents

The Planning (Listed Buildings and Conservation Areas) Act 1990  
Historic England – Historic Environment Good Practise Advice in Planning – Note 3 The setting of Heritage Assets.  
Historic England – Historic Environment Good Practise Advice in Planning – Note 2 Managing Significance in Decision-Taking in the Historic Environment.  
National Planning Policy Framework  
Herefordshire Local Plan Core Strategy 2011 – 2031 – Policies LD1, LD4

- 1.2 The proposals are for internal works to the listed building which would require listed building consent only, and for external works that would require both listed building consent and planning permission.

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- 1.3 The building is prominently sited within the Hereford Central Conservation Area, which contains a high number of listed buildings, and is listed UID 1280595 included on the statutory list on 22 October 1973. The list description describes the building as *Art Gallery and Museum. c1874, by FR Kempson. Coursed dressed stone with ashlar dressings; hipped Welsh slate roof; brick end stacks. EXTERIOR: 3 storeys, attic and cellar; 7-window range: plain lights with trefoil heads, grouped 2/3/2, with moulded pointed arches, enriched capitals and frieze, and central balcony; similar fenestration over, with enriched arches, and sillband; machicolated parapet with quartrefoils, and grotesques to coping; 3 large gable dormers with deep eaves on carved brackets; ornamental ridge tiles. Arcade of 5 pointed arches with wrought-iron gate to central entrance; enriched capitals and architrave; figures and arms over. INTERIOR: C19 Empire staircase with wrought-iron balusters to 1st floor; C19 dogleg staircase with stick balusters from 1st floor. Attic: 4-panel door. 2nd floor: 4-panel doors; fireplace; ceiling cornice. 1st floor (Woolhope Room): 2 fireplaces; cornice and 2 roses.*

<https://historicensland.org.uk/listing/the-list/list-entry/1280595?section=official-list-entry>

- 1.4 The building was part of a larger philanthropic movement in the late C19th aided by legislation including the Museum Act 1845, closely followed by The Public Libraries Act 1850. <https://historicensland.org.uk/images-books/publications/iha-english-public-library-1850-1939/heaq135-the-english-public-library-1850-1939-iha/>
- 1.5 The early library had accommodation on the top floor for the librarian who lived on site, the success of the library required an extension to the rear, in 1912. However it is noted that the original design for the rear elevation with fenestration to resemble a chapel was never completed.
- 1.6 The proposed changes to the interior of the library are as below;

## **2 Basement**

### **2.1 Basement - Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) Full details of the new steelwork are required before that this detail can be considered.
- b) Internal wall insulation details of the basement
- c) Clarification in respect of the strong room door
- d) Clarification in respect of the external stone string course.
- e) Clarification in respect of the tanking of the cellar.
- f) Confirmation as to the age and interest of the front cellar, and potentially after the removal of some plasterwork. A flexible condition to be imposed to permit changes to the cellar should any walls of archaeological or historic merit be found once the inspection of the walls can be undertaken.
- g) A condition in respect of the reuse of the existing bricks to block up the existing rear pedestrian door.

2.2 The current basement is not available for the public and contains at the front element of the building (Broad Street 1874), stairs from the ground floor and 8/9 small rooms, and arched vaults below the pavement. The central section is not indicated as not readily accessible and the rear section onto Aubrey Street ( 1912) is essentially 2 rooms with access stairs from the library, a lift shaft, access onto Aubrey Street and stairs from the ground floor onto Aubrey Street.

2.3 The proposed plans would remove several walls at the front of the building to form, a plant room, storage room, refuse store and lobby, and a lift.

2.4 I note the proposed demolition sections XX-XX-DR--A-12220, however, note that the floor is attributed to circa 1874 ( front) and 1912 ( rear) and are not identified as being removed on the plans Basement demolition plan XX-XX-B1-DR-A-11102 Rev P03 which indicates the walls to be demolished. However the Conservation Management Plan Border Archaeology received 23/03/2023, has incorporated the previous Conservation Management Plan from I understand 2013 prepared by John Somer with the basement considered by room;

- Asset No 3 – Front basement Storeroom 1- Significance High – Capacity for change moderate
- Asset No 4 –basement Storeroom 2 - Significance High – Capacity for change moderate
- Asset No 5 – Library Book Store - Significance High – Capacity for change moderate

- Asset No 6 Museum Art Strong Room - Significance High – Capacity for change moderate
- Asset No 7 Museum Art Strong Room - Significance High – Capacity for change moderate

2.5 The Conservation Management Plan(s) identifies the historic fabric, with the walls and spaces unchanged since the original construction (1874) identified in Asset numbers 3, 4 and 5, the floor is referenced in asset 3 as good condition but unkempt, with concrete floor in Asset 4. Asset 6 as a strong room is entered through a cast iron door, with the significance of this room coming from the original layout and original features including the strong room door and asset 7 having original walls and spaces (1912), both of which have a concrete floor. This conflicts with the demolition sections XX-XX-DR--A-12220, which attributes the floor also to 1912. The proposed basement plan XX-XX-B1\_DR-A-41100 Rev P04, suggests that the strong room door will be retained, however this is not confirmed.

2.6 One of the original walls is to be removed (between proposed office and stairwell), and reconstructed in close proximity, no justification for the relocation by such a small amount, and why the original wall cannot be retained has been provided. The plans indicate that 150mm of internal wall insulation will be provided, but no details of what that insulation will be.

2.7 The demolition plans do not include the works to the floor. The Conservation Management Plan confirms in section 11.2.2 that the existing floor in the rear basement is to be removed and replaced with reinforced concrete supported on rows piles, with excavation for the 2 lifts. The basement Foundation Plan prepared by Barnsley Marshall in figure 29 of The Conservation Management Plan identifies 10 structural supports. The cross section B-B appears to be immediately north of the structures on in figure 29 and does not identify those structures. Similarly section C-C- appears to be between 2 of these structures on the southern wall, however are not identified in the cross sections, and Figure 2 in the Structural report indicates that these supports will be the entire height of the building, however are not shown on floor plans. Section D-D does indicate the new pile foundations on the southern wall, and 2 other pile foundations that appear to stop at the ground floor, however this is a part cross section. Section E-E is not clear as the line indicating the cross section appears to be drawn through the northern wall, however the details are of the southern wall. Section F-F appears to be through the northern wall in an area which appear to be relatively untouched when looking at the northern elevations, however a grey line in on the sectional drawings adjacent to the existing brick wall. This feature has not been identified on the cross section or the floor plans, but when referenced to Figure 2 in the Structural report indicates that these steel supports will be the entire height of the building.

2.8 There will be 2 lifts in the basement, a service lift at the rear, and a visitor lift in the stairwell of the 1874 front range. Both of which will require works below basement floor level, however the removal of floors is not indicated on the demolition plan, nor original plaster nor ceilings.

2.9 As such it is not clear from the submission the full extent of the works to the cellar floor which should have been provided. In addition the steelwork appears to continue through the building but are not included on floor plans, and should be considered as part of the listed building consent application. Further information is required in this regard.

2.10 Externally the rear section will retain one of the larger rooms, but subdivide the other to provide a workshop and storage, and a wc will be formed for those working in this area. The stairway to the upper floors will be enlarged, as will the service lift, which will have new doorway location onto Aubrey Street, and the existing central service doorway onto Aubrey Street will be replaced with glazing to form a window to an office.

2.11 Ideally the new doorway from the pedestrian access would be centralised below the window above to retain some symmetry, however noting the difference in ground levels, the location of the

new doorway is understood. The original elevation appeared to have 3 relieving arches, with the central higher arch forming the access to the basement. One arch will be lost by the formation of the lift doors, and the other archway has already been compromised by the existing pedestrian doorway. Should the application be determined favourably to avoid the infilling of the former doorway in bricks that would be difficult to match, it is requested that consideration be given to the re-use of the bricks removed in the formation of the lift opening and new pedestrian doorway to infill the former pedestrian doorway. However clarification is sought in respect of the stone string course. The existing plans suggest that the doorway is sited below the existing stone string course, and that the new doorway will follow suit. However when the former door was inserted the stone string course was removed and replaced with slip of concrete presumably to hide the supporting beam. The plans do not indicate if an element of the stone string course will be removed to form the new doorway. Ideally the new door would sit below the existing stone string course and the concrete above the existing doorway be replaced with stone detailing to match. However if this is not possible due to height restrictions, then the stonework above the proposed doorway be reused to infill the length previously removed with any shortfall to match and details of the stone string course should be submitted. I would however refer to the Conservation Management Plan which identifies this elevation as Asset number 2, of high significance with capacity for change low, with the risk/recommendation that *“Any alteration/ extension to this façade would severely affect its significance”, a conservation approach is needed.* The current proposals appear to be seeking changes to this elevation which would be contrary to the previous Conservation Management Plan. This should be referenced against the recent Heritage Statement Revision February 2023, which considers the proposed works at basement level to be a major intervention with a slight/Moderate impact. I would not necessarily disagree with the conclusions of the recent Heritage Statement Revision February 2023, subject to the clarification in respect of reused bricks to infill openings and the stone string course. Nonetheless I note that the proposed works to the cellar floor in respect of the steelwork has not been included within the Heritage Statement Revision February 2023. Further information in this respect is required.

2.12 The earlier Conservation Management Plan indicates that the basement is proposed to be tanked, and its location below ground is noted. However the fact that it is/was used as a book store is also noted in figure 49 of the earlier Conservation Management Plan. The Design and Access Statement does not indicate the type of tanking proposed just that the walls will be insulated. This is referenced in the Heritage Statement Revision February 2023 where Internal Wall Insulation only is referenced. The consideration that the level of intervention would be major but the overall impact slight as the existing walls are largely retained where possible is not necessarily agreed with as the walls are not readily viewed being used for storage, and as such the interest that the walls contain is not yet known. In addition where the public rooms were plastered, the basement being a cellar may have had a different treatment reflecting its use. However the proposal would be for 150mm Internal Wall Insulation which will change the appearance of the walls to a significant degree. This is not necessarily to say that the change could not or should not occur as its location beneath the pavement is noted, merely that the changes should be considered based on the historic fabric of the building. It is noted that the current building replaced a former building that appears to have a Georgian exterior from the photograph circa 1860's (figure 6 Conservation Management Plan). It is likely given the proximity to the cathedral that this site was in early occupation at the Broad Street frontage, and this is indicated by John Speeds map of 1610. Hyperlink below <https://herefordshirehistory.org.uk/archive/herefordshire-historic-maps/hereford-maps/146580-plan-of-herford-city-from-speeds-map-1610>

2.13 The Archaeology and Heritage Desk based Assessment quite accurately references other buildings in the locality that have medieval cellars with more recent properties above ground. However the age of this cellar is not yet known, and assumed to be from the 1874 construction. Whilst this may be the case, this has not been confirmed presumably because of the lack of visibility in the front basement as a result of its use as storage and services has prohibited this assessment.

2.14 As such it would be regrettable if tanking/insulation of the basement were consented before the basement could be recorded, and should medieval fabric be found it should be recorded for the Historic Environment Record prior to it being lost. However should the basement at the front of the building be a good example of a medieval basement within Hereford ideally it should be retained in situ without tanking. It does not appear that this building was surveyed as part of Herefordshire Archaeology Report no 266 A Characterisation of This Historic Townscape of Central Hereford and as such no records of the age of the cellar are as yet known.

[https://www.herefordshire.gov.uk/downloads/file/1640/historic\\_townscape\\_of\\_central\\_hereford\\_report\\_march\\_2010](https://www.herefordshire.gov.uk/downloads/file/1640/historic_townscape_of_central_hereford_report_march_2010)

2.15 It is acknowledged that this project has evolved over time and that numerous considerations and options have been discussed, and that the utilisation of the basement for public access was previously discounted as a result of the low ceiling heights. However as so much of the floor has to be removed for structural reasons, could the floor be lowered? The site is within a designated area of archaeological importance, (one of only 5 in the Country) and the below ground works will be considered by archaeologists on site and I duly note with interest the Archaeological and Heritage Desk Based assessment which details the known archaeology of the area. Whilst the observations in terms of the works to the built fabric have been detailed above, it is just an observation that if the cellar has to be excavated, and not all of the space is required for storage/acclimatisation, then have we missed an opportunity for exhibition space in the basement that being below ground would provide a unique opportunity for an exhibition illustrating the stratigraphic layers of the city and the archaeological layers of history below our feet. The lack of access between the front and rear cellar is of course noted and that there will still be the need for service rooms and such a unique view of the city may not be possible for practical reasons, however given the status of Hereford as an area of archaeological importance, an opportunity to celebrate our rich archaeological heritage within the city would be a welcome and interesting feature of the city, and tie in with the buildings history and its relationship with the Woolhope naturalists Field Club.

### **3. Ground Floor**

#### **3.1 Ground Floor Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) Full details of the new steelwork are required before these works can be considered, and with particular reference to the steelwork in the current library and the relationship with the existing pilasters.
- b) Relocation of the new wall to express the pilasters or a cross section illustrating how the pilasters are to be incorporated into the wall at a scale not less than 1:10
- c) The Conservation Management Plan identifies that the walls in the foyer are load bearing, however it is proposed to remove 2 large sections of walls, whilst retaining the upper parts of the wall, no details as to how that will be achieved has been submitted. It is assumed that a RSG or similar is required to span the opening created. Full details including elevational details of these walls and the necessary works to create the width of openings proposed should be provided before this element can be considered.
- d) Clarification of IWI around windows and pilasters in the current library and further consideration of the IWI in this room in respect to the expression of the pilasters.

- e) The internal wall insulation is noted, on Heritage plans Ground Floor Entrance Area, XX-00-DR-A-16000 rev P02, however how that relates to the corncicing has not been detailed. The photograph on XX-00-DR-A-16000 rev P02 is of a cornice above suspended ceiling to be removed, however the removal of the suspended ceiling to restore the original height and the relationship with the windows would be welcomed, however the internal wall insulation on the side elevations would be 40mm, and the relationship with the cornice should be detailed, and 100mm IWI is proposed on the front elevation, however the walls are actually quite minimal around the windows. A detailed plan indicated how the IWI will be addressed in the window reveals should be submitted as XX-00-DR-A-16000 rev P02 seems to suggest that the 100mm IWI will continue on the window reveals which will obscure a high proportion of the window frame and a substantially slimmer IWI if required is suggested such as aerogel for the internal front wall.
- f) A detailed plan indicated how the IWI will be addressed in the window reveals should be submitted as XX-00-DR-A-16000 rev P02 seems to suggest that the 100mm IWI will continue on the window reveals which will obscure a high proportion of the window frame and a substantially slimmer IWI if required is suggested such as aerogel for the internal front wall.
- g) The large timber skirting boards identified in the Conservation Management Plan appear to be lost and replaced with new hardwood square profile skirting as identified on the proposed floor finishes 1 of 2 XX-XX-DR-A-15100 rev P02. The rationale for the loss of the skirting boards appears to be the IWI, however a slimmer IWI could retain the skirting boards or they could be re-used. Further information is required in this detail.
- h) Clarification why the existing plaster cannot be retained
- i) An alternative to the roller shutter Door IDT09 on Internal Door Assemblies XX-DR-A-27601, and consideration of more wall retained.
- j) Clarification that the existing windows not to be removed are to be retained in their current condition and in particular further information in respect of the lancet window on the stairwell.
- k) Fineo 12 vaccum insulated glazing suggested as an alternative to the secondary glazing being proposed in the current library which would obscure architectural detailing.
- l) Clarification in respect of the large timber skirting boards identified in the Conservation Management Plan
- m) Clarification as to the treatment of the infilling of the 2 windows – an alternative colour to the Corten steel is suggested.
- n) Consideration to be given to the restoration of the tracery window to the north elevation to enhance the building in accordance with CS policy LD4
- o) Details of the paint to be used on the stone mullions – could be conditioned or ideally removed and original stone finish restored.
- p) An alternative paint colour for the render is requested ideally a stone colour – however could be conditioned.
- q) The Heritage Statement Revision February 2023 references the insertion of 6 vision panels to below ground coal shutes, whilst noting that the details continue to be developed, these works do not appear to be referenced within the application.

3.2 The ground floor is currently and will continue to be divided into distinct areas all requiring different considerations.

### **3.3 Ground Floor Entrance Hall.**

3.3.1 This area fronting Broad Street is the original part of the building and was originally designed as 2 rooms (originally retail) around a central entrance and vestibule, was previously



classrooms and over time the southern room became the ladies reading room. However these rooms have subsequently been utilised as smaller non public rooms, with the front windows becoming window displays in 1955, which whilst providing exhibition space at pavement level, it has in affect created a street frontage that appears non-active and in some respects uninviting.

3.3.2 The Conservation Management Plan identifies this area as;

- Asset number 8 Library Admin, Significance Very High – capacity for change Low
- Asset number 9 Main Entrance arcade - Significance Very High – capacity for change Low
- Asset number 10 staff cloak room and disabled wc - Significance Very High – capacity for change Moderate.

3.3.3 It is noted that this was previously considered in the former Conservation Management Plan to have a low capacity for change. The change in the capacity for change assessment between the 2 documents is not readily apparent, however assumed to be as a result of works undertaken in the formation of wc's between the earlier Conservation Management Plan and the more recent document. It would have been useful for the change in assessment to have been clarified for the avoidance of doubt.

3.3.4 However it is noted that the original Conservation Management Plan identified that the original walls to the former classrooms should be preserved in any future works, and the current Conservation Management Plan identifies that *“The foyer is in its original configuration and any modifications without a conservation approach will have an effect on the significance of the foyer in relation to the building”*. Nonetheless it is now proposed to remove them at ground level and retain the higher level. The Conservation Management Plan then confirms that *“the existing walls beside the entrance lobby have been retained, with new sliding partitions proposed to allow flexibility and the option of separating the spaces”*. It is not agreed that the walls have been retained, as large openings are proposed, and acknowledging the proposed sliding partitions identified in the Conservation Management Plan, when open the spaces will be greatly different from the original and current layout. Perhaps the openings could be reduced in size to illustrate more upstanding walls either side of the proposed openings. In addition as the walls are load bearing it is assumed that there will be requirement for a RSG or similar, these works should have accompanied the listed building consent application.

3.3.5 In addition there appears to be a discrepancy between proposed ground floor plan XX-00-DR-A-41110 Rev P02, which indicates that roller shutter screens are proposed on the new openings created, and drawing XX-00-DR-A 16000 rev P02, Heritage Plans Ground Floor Entrance which indicate that there will be sliding screens to divide spaces when required. I note the Internal Door type IDT09 on Internal Door Assemblies XX-DR-A-27601, which indicates a standard roller shutter door. **The introduction of roller shutter screens is not readily supported**, and whilst the desire for flexibility is understood, the separation of spaces within a listed building with roller shutters, which also would be visible from the pavement is not supported. Such a feature would not be considered to comply with Core Strategy Policy LD4 which seeks to protect, conserve, and where possible enhance heritage assets and their settings in a manner appropriate to their significance, and as such an alternative separation is required, such as glass doors/ screens or bifold doors, or bespoke gates. An alternative method of separating the spaces is therefore required.

3.3.6 I note that the existing parquet floor currently covered with carpet is to be refinished and restored, which is welcomed.

3.3.7 Externally the proposal would remove the modern railings and reintroduce glazing that allows views into the building, which is welcomed as this creates a street frontage with more interest than currently and it is noted that the reception desk also suggests an element of retail which would be desirable on the street frontage. However the proposal would also remove some original walls

which is not ideal, but in many respects the public benefits to form an active street frontage would outweigh concerns in respect of the loss of the walls. However it is not clear what the southern room will be, as it is annotated as orientation exhibition but also houses lockers. Whilst acknowledging that this is an application for works to the built fabric of the building and that exhibition space/size and design will inevitably change over time to accommodate new exhibitions, it is hoped that this room will have an element of associated retail or exhibition space to create the active frontage and warrant the removal of historic fabric, previously identified in the Conservation Management Plan as to be preserved.

3.3.8 The benefits to the street frontage by the loss of the display panels and opening up the street frontage is welcomed, however this benefit has to be outweighed against a dead street frontage and the prominence of roller shutters to this listed building. An alternative to the roller shutters is sought and some clarification in regard to the street frontage rooms that hopefully will not just be locker storage.

### **3.4 Stairwell**

3.4.1 The stairwell is of interest as it provided a larger public staircase to the upper floor, and a secondary smaller staircase to the librarians accommodation on the top floors, with an obvious difference in size, scale and prominence of each staircase. The proposals include the removal of the suspended ceiling to restore the original height and the exposure and reinstatement of a lancet window on the side elevation which is currently hidden from view. The re-instatement of this space to close to its original proportions and the opening of the blocked up lancet window is supported and would be considered to be an enhancement to this section of the building. I reference XX-XX-DR-A-22600 Proposed and retained window schedule that this is indicated as an existing window. I note the photograph on figure 56 of the Conservation Management Plan which suggests it was a sliding sash. The details on Window Types drawing 2 of 2 XX-XX-Dr-A-22611 Rev P02, indicate that it is a fixed window, however, the drawings are of a scale that requires further information plus a cross section through the windows at an appropriate scale and details of the material. For clarification if no work except secondary glazing is required for the existing windows to be retained as detailed on the proposed and retained Window Schedule XX-DR-A-22600 this should be specified.

3.4.2 It is noted that the Conservation Management Plan Border Archaeology received 23/03/2023 identifies that the significance of this area is very High and the capacity for change very low, however the proposal are for the removal of a modern suspended ceiling which is supported, and the exposure of a previous window, which again is supported. The reinstatement of the parquet floor is welcomed.

### **3.5 Exhibition 01.**

3.5.1 The doorway leads directly off the stairwell and it is proposed to widen the doorway

3.5.2 This is currently a single height room, which was formerly a 2 storey room, which had a floor inserted and has been used as storage in recent times, which has obscured the ornate corbelling from public view. The proposal would remove the inserted floor over half of the room allowing the original 2 storey structure to be viewed, with a mezzanine over the remainder of the room. The loss of the current modern stairway is beneficial and enables a more discrete location for the new stairs to be sought.

3.5.3 The Internal Wall insulation would remove the existing plaster, which appears to have been compromised by previous works and repairs and whilst the removal of historic lime plaster cannot

be justified, the previous alterations and repairs in this room are noted and no objection is raised to the proposed internal wall insulation which is to stop below the corncing. However, Proposed Ground Floor – XX-00-DR-A-41110 rev P02 indicates that the internal wall insulation will be 100,mm thick, whereas Heritage Plans Ground Floor Exhibition 1 XX-00-DR-A-16015 Rev P01 indicate that the lower external wall will be a total of 122.5mm thick, insulation and plaster however the upper wall would be insulated with a different material and should not exceed the depth of the architectural detailing. Clarification is sought in this regard as the 2 plans documents appear to differ in the approach to be taken . Details of the upper wall insulation is required, in addition to why the historic plaster needs to be removed, both on the upper wall and the lower wall.

3.5.4 Whilst there are benefits to the removal of the mezzanine on half this floor, it would have been preferable if possible for the whole room to be restored to its original proportions, however the need for staff rooms is duly acknowledged. Nonetheless it would have been desirable for the stone tracery window on the north to have been restored especially as it appears to service a staff kitchen and not an exhibition room which requires control of light entering the space. The elevational drawings indicate that corten steel is to be used to screen the window. Whilst noting the use of corten steel elsewhere on the building, if the window cannot be expressed in a different manner, then an alternative material to that used on walling would be suggested to differentiate a former window to a wall. Details of the works around the window – i.e will the steel ( or similar) be behind the stonework, or within the stonework should have been submitted, at an appropriate scale. This item can be conditioned, however it would be useful to have some clarification at this stage as there are several options that are available and to ensure that we are considering what is being intended/proposed.

3.5.5 If the window cannot be reopened, could consideration be given to the relocation of the new wall to the breakout room 01-009, to be on the eastern side of the corbel to permit the viewing of the corbel from the exhibition room 00-012.

## **3.6 Exhibition 02**

3.6.1 There are 2 doors into this room from the neighbouring exhibition space which are proposed to be changed to a large single door. This large 2 storey space is currently used as a library and has a modern mezzanine floor inserted. The proposal would remove the mezzanine floor restoring the 2 storey proportions, and the loss of the mezzanine is supported as the original proportions will be addressed in part of the room, however the proportions of the room will be compromised in terms of floor area as the ground floor area of the room would be reduced on the western area of the room to replace the service lift with a larger lift for exhibits and for a means of escape staircase from the upper floors. The central area between the lift and the stairs is accessible from this room and it is proposed to create 2 rooms in this area divided vertically, with part of the upper floor being open to the room below. The upper room appears to have a glazed wall to the main exhibition space, and a glass balustrade to the void, resulting in a very small non soundproofed flexible space being created, however it is assumed that this may be to permit the viewing of exhibits from a different higher angle which would be interesting.

3.6.2 Nonetheless the location of the proposed division is not considered to be appropriate with the new wall coming off the pilasters with corncing above. I note page 18 of the Heritage Statement which confirms that decorative corncing will be retained where possible, however would not consider that those are adequate details and the fate of the corncing is required at this stage of the consideration. In addition to the wall having to be scribed around the corncing, of the pilaster, the proportions around the windows to the south elevation will be compromised. It is noted that the existing door to the stairs will exit at the same point, however that had a mezzanine above so the pilaster was still expressed. A slight re-location of the new wall to on side of the pilaster or the other and ideally to the west is requested. Should the wall not be able to be relocated cross sections of

1:10 in both directions illustrating how the pilaster detail will be considered in the construction of the new wall should be submitted prior to determination of this detail. The impact on the pilasters should have accompanied the application in more detail, in order that the rationale for the precise location of the wall and the impact on the architectural features of the room be detailed and understood.

3.6.3 In addition clarification is sought as to the location of the new steel frame as referenced on page 7 of the Structural Report, which describes that “in order to accommodate the localized breaking out of existing floors at the rear of the building to accommodate the full height stairs and lift, a new steel frame has been introduced. This frame will provide both support for each floor level and trim the floor openings, but also provide necessary lateral stability to the existing gable masonry wall which will subsequently be unrestrained full height”. This steel frame is not readily apparent on the proposed floor plans or the Design and Access Statement, or Heritage Report for this floor. However the cross sections Section B-B-F XX-XX-DR-A-45505 Rev P01 has pale grey lines on the cross section, leading down below the basement with pile foundations, which appear to line up with the western pilaster. Full details of this steel work and its relationship with the pilasters is required. Figure 2 within the structural report suggests the proposed structural model, and seems to suggest extensive steelwork, that has not been included on the floor plans. Full details of the steel work proposed should have accompanied the listed building consent application as they are not included in the floor plans or exhibition view which suggests the retention of the pilasters, however figure 2 of the structural report suggest steelwork in front of the pilasters which is not indicated elsewhere in the application. Clarification in respect of the steelwork is required.

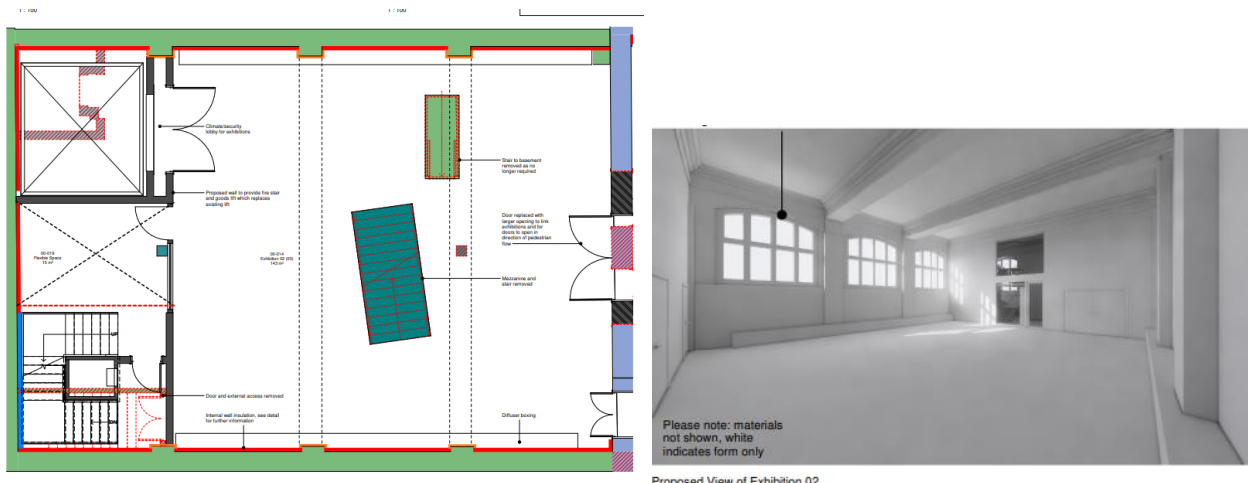


Figure 1 and Figure 2 Heritage Plans Ground Floor Exhibition 2 XX-00-DR-A-16020 Rev P01

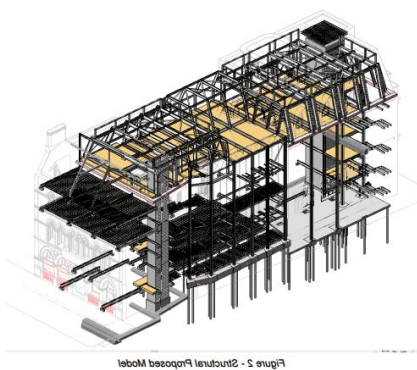


Figure 3 – reproduction of Figure 2 of the Structural report

3.6.4 The proposed view on of exhibition 2 on Heritage Plans Ground Floor Exhibition 2 XX-00-DR-A-16020 Rev P01 indicates the pilasters on the northern elevation, however it is not considered that this degree of pilaster will be expressed by the use of 100 or 122.5mm. The Internal Wall Insulation is noted and not readily accepted in that the insulation would minimise the visual prominence of the pilasters which are a key feature in the design. It would be preferable for the IWI to not butt against the pilasters thereby retaining the original depth of the pilasters, and presenting “feature” insulation panel to display paintings and exhibits with the area between the pilasters and the pilasters themselves to have a slimmer form of insulation than the 60mm proposed such as aerogel or similar. No cross section of the insulation has been provided, which is specified as 100mm on the Heritage Plans Ground Floor Exhibition 2 XX-00-DR-A-16020 Rev P01, however other rooms have this figure but the sections show the insulation to be 122.5mm. Between the pilasters the insulation will visually reduce the depth of the pilasters, and precise details of how this is to be achieved is required. Further consideration in respect of the depth of insulation adjacent and on the pilasters is again requested in order that this element can be supported.

3.6.5 The west elevation currently has 3 windows on this floor that are currently blocked up and the proposal will reopen 2 of them which is greatly welcomed and would add interest and vitality to the Aubrey Street elevation. The third window would be on the lift shaft and cannot be reopened. However noting it is corten steel that is to be used to screen the window, and the doors to the lift shaft below, it would be preferable if another material were used to screen the window to reflect that this is a window and not a door or masonry.

3.6.6 I would however question the method of secondary glazing, which appears to be a continuation of the internal wall insulation, which is not a system readily supported especially for windows of this quality, notwithstanding the fact that they are blocked up currently. With the absence of glass in these 2 windows, it is suggested that as an alternative that the Fineo 12 vaccum insulated glazing that is proposed on the Broad Street windows be utilised. I note the cross section which whilst at 1:50 is of 1:20, however this scale is not readily accepted in respect of glazing details to listed building which are at least 1:10 or even 1:5 with glazing bars at 1:1 These details will have to be conditioned, but ideally will be changed to have a more appropriate form of upgrading to this listed building than the secondary glazing proposed. This would be consistent with requests made in respect of other listed building consent applications in terms of glazing and secondary glazing and to be consistent in the approach amendments are again requested.

3.6.7 This request is consistent with advice given at pre-application stage in respect of the windows to the south elevation, and the same comments would be made to that elevation that the secondary glazing would sit within the window frame and obscure the stone mullion. The secondary glazing or replacement glazing should sit within the stone mullions. Notwithstanding figure 43 of the windows and door report, amended details are sought in this regard whereby the secondary glazing sits within the stone mullions or the fineo 12 glazing used within the existing frame. I note the details of the Internal wall insulation (IWI) on Heritage Plans Ground Floor Exhibition 2 XX-00-DR-A-16020 Rev P01, however this does not include a cross section through the windows to assess the insulation on the window reveals. Figure 42 suggests that there is no IWI above the bull nose cill detail and between the pilasters, this should be clarified and if not the case a cross section to ascertain the IWI on the window reveals is required prior to the IWI being agreed.



Photograph 1



Photograph 2



Photograph 3

3.6.8 The above photos indicate the curved bull nose detailing around the window, within the window frame and the window surrounds, which would be covered by the secondary glazing proposed. The photographs below indicate that there is sufficient depth within the frame for secondary glazing. Or preferably Fineo12 replacement glass that will enable the stone window and its detail to be expressed. The peeling paint indicates the window below is stone which ideally should be retained as natural stone and not painted.



Photograph 4



Photograph 5

3.6.9 I note that the stone mullions are to be painted, however they presumably were not originally painted but stone. Details of the paint and colour to be used would be required, however this could be conditioned.



Photograph 6

Photograph 7

Photograph 8

Photograph 9

3.6.10 The above photographs illustrate the depth of the pilasters, the corbel at the head of the pilaster and the cornicing around the ceiling. Internal wall insulation of 100mm is proposed against the pilaster side and 40mm on the pilaster face.

3.6.11 Externally I note that the external existing cement render is to be removed and a breathable lime render applied in its place, details of the removal techniques should have accompanied the application, however can be conditioned. Of concern is the proposed colour choice of charcoal. Given the stone string courses, it is considered that charcoal was not a colour historically used for masonry and reserved for joinery, and the introduction of charcoal render would not be supported an alternative paint colour from a traditional colour palette for render is requested.

## **4 Woolhope Room**

### **4.1.1 Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) Figure 2 within the Structural report indicates new beams/joists in this locality. These details should be clarified or provided before they can be considered.
- b) White window seals – exact type of seal and location to be agreed by condition
- c) Minor repairs to the balcony to be conditioned
- d) Details of the venting to be conditioned.

4.1.2 The Woolhope Room has been identified as high significance in both the Conservation Management Plan and the Heritage Statement, which has resulted in an approach of minimal intervention within the Woolhope Room which is welcomed, noting the original features of the room. The proposals include the repair of the window frames and the replacement of the glass with double glazed units. This approach is welcomed, however it is noted that figures 10 and 11 of the Window and Doors Report XX-XX-RP-A-61810 indicates that the existing 4mm glass is to be replaced with 11.7mm glass and this approach is often used where the window frames can accommodate the increased thickness and weight of the glass. It is noted that the white window seals – exact type of seal and location to be agreed. Given the details within the Window and Doors Report XX-XX-RP-A-61810, it is considered that this element can be conditioned.

4.1.3 Heritage Plans Woolhope Room XX-02-DR-A-16010 Rev P02 indicates that there will be minor repairs to the balcony, these repairs should have been specified in the application, and whilst clarification would be preferred at this stage, as the works have been described as minor, this matter can be conditioned.

4.1.4 The drawing references ventilation boxing but no details save the location has been provided, clarification in respect of the size, materials and appearance of this venting should have accompanied this application, however noting the location, this element could be conditioned.

It is noted that the perimeter bookshelves on the north and south wall are understood to be original and as such would be considered as fixtures and fitting covered by the listing, for which listed building consent may be required for their alteration. Heritage Plans Woolhope Room XX-02-DR-A-16010 Rev P02 indicates that there will be minor alterations to unsightly modern interventions, and directed to the photograph for more detail. The works proposed are not clear and as such it considered that this element should be conditioned.

## **5.1 Third Floor**

5.1.2 These are currently 2 large rooms for a museum and exhibition space and these 2 rooms will remain with some proposed changes.

### **5.1.3 Third Floor Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) Clarification and details in respect of the vertical steel supports should be provided before this element can be considered.
- b) It is noted that the ceiling is to be retained as indicated on XX-DR-A-14410 Rev P02. However the Heritage Statement confirms that the existing ceiling structure is to be taken down and reinstated, clarification as to whether the ceiling will be retained or dismantled and re-erected and if the later the methodology should accompany the application in order that this element can be considered.
- c) Clarification in respect of the internal wall insulation in Middle Exhibition Hall/Museum are required. The IWI in Exhibition 4 ( 003) clarification is required in respect of the trusses which appear to have the same dimensions on both Section F-F XX-XX-Dr-A-45525 rev P01 and Section D-D XX-XX-DR-A-45515, whereas section F-F indicates the vertical steel supports adjacent to the existing wall. Clarification as to the proposed works to the trusses are required, as Section D-D XX-XX-DR-A-45515 indicates that the timber trusses are to be supported and protected throughout the works which is welcomed, however the Structural Engineer is to confirm new fixings and support system to Delta beam construction. These details are required in order that this element can be considered.
- d) drawing Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 indicates that there will be 100mm of IWI behind existing hardboard lining. Clarification in respect of the cornicing and if the 100mm IWI is indicative as it will be behind existing hardboard.
- e) The Heritage Statement confirms that there will be internal wall insulation 100mm thick on the north and south walls, however the floor plan on the Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 details that the 100mm of insulation would be on the north wall only with plant rooms to the south. However Section D-D XX-XX-DR-A-45515 suggests that there will be insulation also on the south wall.
- f) The Heritage Statement confirms that the insulation would stop below the existing corbels approximately at the height of the existing display panels. Whereas the Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 confirms that the lower external wall will be a total of 122.5mm thick, insulation and plaster however the upper wall would be insulated with a different material and should not exceed the depth of the architectural detailing. Clarification is sought in this regard as the three documents differ in the approach. Details of the upper wall insulation is required, in addition to why the historic plaster needs to be removed.

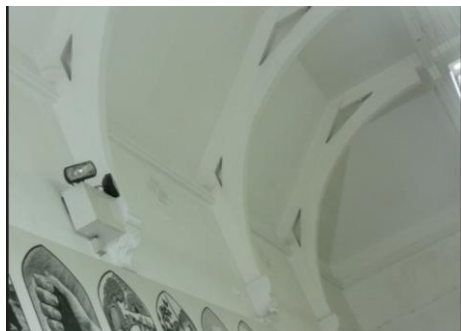
## **5.2 Middle Exhibition Hall/Museum**



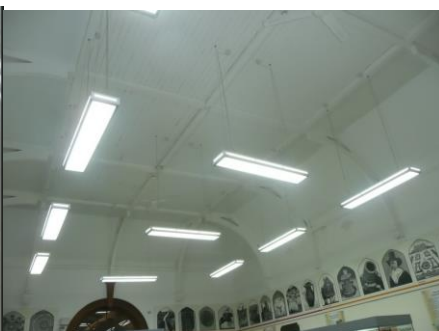
5.2.1 The 3 main changes proposed are; the existing ceiling structure is to be taken down and reinstated following the installation of a new structure to support it above, internal wall insulation and 2 new doors on the southern wall.

5.2.2 The Heritage Statement confirms that there will be internal wall insulation 100mm thick on the north and south walls, however the floor plan on the Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 details that the 100mm of insulation would be on the north wall only with plant rooms to the south. However Section D-D XX-XX-DR-A-45515 suggests that there will be insulation also on the south wall. It would have been useful if this cross section extended across the building to include the northern wall which is on Section F-F XX-XX-Dr-A-45525 rev P01. However the northern part of the building is covered by cross section C-C XX-XX-DR-A-45510 Rev 02. One plan showing the whole cross section would have been useful. It is assumed that the southern IWI will be on or within the new curtain wall and not on historic walls which would be appropriate.

5.2.3 The Heritage Statement confirms that the insulation would stop below the existing corbels approximately at the height of the existing display panels. Whereas the Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 confirms that the lower external wall will be a total of 122.5mm thick, insulation and plaster however the upper wall would be insulated with a different material and should not exceed the depth of the architectural detailing. Clarification is sought in this regard as the three documents differ in the approach. Details of the upper wall insulation is required, in addition to why the historic plaster needs to be removed.



Photograph 10



Photograph 11



Photograph 12

5.2.4 The above photographs indicate the trusses in this room with the carved decorative supporting corbels, and the cornicing. Clarification as to how these will be expressed against the IWI is required.

5.2.5 However Section F-F XX-XX-Dr-A-45525 rev P01 suggests that there will be steelwork running down the internal walls of the building, however this does not seem to be indicated on the proposed floor plans. Full details of the steelwork in all rooms and how it will be addressed internally should have accompanied the listed building consent application. The absence of the vertical steelwork on the proposed plans and only indicated on the cross section does not provide sufficient information to consider the visual impact of this steel work on the listed building, these details are required prior to a decision being made in order that it can be considered as part of the application. Whilst acknowledging that the scheme has evolved, nonetheless the impact of the steelwork on this floor does not appear to have been addressed in the Heritage Statements or Design and Access Statement.

5.2.6 Clarification is required in respect of the trusses which appear to have the same dimensions on both Section F-F XX-XX-Dr-A-45525 rev P01 and Section D-D XX-XX-DR-A-45515, whereas section F-F indicates the vertical steel supports adjacent to the existing wall. Clarification as to the proposed works to the trusses are required, as Section D-D XX-XX-DR-A-45515 indicates that the

timber trusses are to be supported and protected throughout the works which is welcomed, however the Structural Engineer is to confirm new fixings and support system to Delta beam construction.

5.2.7 It is noted that the ceiling is to be retained as indicated on XX-DR-A-14410 Rev P02. However the Heritage Statement confirms that the existing ceiling structure is to be taken down and reinstated, clarification as to whether the ceiling will be retained or dismantled and re-erected and if the later the methodology should accompany the application. It is noted that the Conservation Management Plan – Border Archaeology 23/03/2023 identifies this room as having very high significance with a low capacity for change and as such these details are required to assess the impact upon the significance. However noting the extent of the work in this rooms and adjacent rooms, clarification as to the outcome of this ceiling, that is confirmation how the ceiling would be taken down and reinstated should be submitted as the documents appear to differ in the detail.

### **5.3 Third Floor Exhibition 4**

5.3.1 This room is currently one large room, with a lift in the north western corner and a storage area in the north east corner. The proposal would involve dividing the room to accommodate the stairs, a larger lift and a central flexible space. There are no windows in this room and the room is lit via rooflights above a glass ceiling.

5.3.2 The proportions of the room will change significantly by the insertion of the stairs and lift, although the reasons for their requirement is duly noted, and the loss of the modern stairs would assist in the appreciation of this space. It is noted that the flexible space will have a glazed elevation which will assist in the appreciation of the original space on the ground floor, however the second floor would appear to have a solid wall ( section B-B XX-XX-DR-A-245505 Rev P02 and XX-03-DR-A-A-16031 rev P02. As the flexible space would not have a window or natural light, possibly a window to the upper flexible space could be considered which would make the room more usable, add verticality and if used by the public permit a different viewing angle of the exhibits. It would be preferable if the slate bench could be retained on the western elevation of flexible space 03-005 to indicate this this was formerly one large room, the cross section on XX-03-DR-A-16031 Rev P02 indicates an external wall, which suggests its retention in this space, however it is not on the floor plans, and this should be clarified. However the loss of the slate bench feature in the lift shaft and stairwell is regrettable but understood.

5.3.3 The structural steels as indicated on section B-B XX-XX-DR-A-245505 Rev P02 should have been included on the floor plans to assess their impact on this room. The Conservation Management Plan identifies this room as having an exceptional/ high significance and a low capacity for change, however, there appears to be a substantial degree of change proposed as identified in the Heritage Report as Moderate/large in respect of the removal of the ceiling and provision of lift and stairs. As such information in respect of the steel work is required in order that the insertion of steelwork into this room can be considered.

5.3.4 In terms of internal wall insulation I note that the drawing Heritage Plans Third Floor Exhibition 3 XX-02-DR-A-16025 Rev P01 indicates that there will be 100mm of IWI behind existing hardboard lining. It was understood that a different form of IWI would be used in this room to fill an existing cavity that exists. This approach is welcomed as it retains the original wall coverings and the slate benches. However it is noted that the existing cornicing will have to be re-attached. Clarification in respect of the cornicing and if the 100mm IWI is indicative as it will be behind existing hardboard.

5.3.5 Notwithstanding the above comments clarification is sought on the colouration of the IWI as the north and south walls have a red line depicting 100mm however there appears to be also a

green line depicting 40mm IWI. The green line around the door frame is assumed as being circa 1910 date and not insulation.

5.3.6 The glass ceiling has to be removed to facilitate the additional floors, and this has been attributed in the Heritage Statement as a very large overall impact, and within the Conservation Management Plan Border Archaeology and an area of high significance with low capacity for change. The significance of this room is agreed with, and there are changes proposed to its space both vertically and horizontally. The loss of the ceiling is extremely regrettable, however its condition is noted and the obvious practicalities of maintaining or cleaning such a feature noting the size of the crawl space above. If considered in isolation this loss of historic fabric would be difficult to justify and could not be supported, however I am aware of the discussions that have occurred to keep this feature and that this is part of a larger scheme involving additional floors. Notwithstanding the significance of this feature, should the scheme be approved because of the benefits to the museum itself I would raise no objections to this element of the proposal as it is part of a wider scheme retaining and expanding the historic museum.

## **6. Fourth Floor**

### **6.1.1 Fourth Floor Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) Clarification and details in respect of the vertical steel supports and new floor in the 1874 section of the building, should be provided before this element can be considered.
- b) Slimmer IWI on the three Broad Street rooms and the retention of the cornice, architrave and picture rail, and the reuse of the skirting boards. Can be conditioned if agreed.
- c) Consideration of the retention of the staircase to the librarians quarters. As this is a substantial loss to the significance of the building
- d) Re-consideration of the size and design of the window to the stairwell in line with national policy and in terms of LD1 and LD4 and the Draft Hereford Design Guide.
- e) Reconsideration of the heads of the venetian gothic windows in line with national policy and in terms of LD1 and LD4

6.1.2 This floor is above the Woolhope Room in the 1874 section of the building with the windows facing Broad Street. Hereford Museum was one of a relatively small number of Libraries constructed with accommodated for the librarian, and the librarian was housed on the upper 2 floors of the building, with a small domestic access from the landing adjacent to the Woolhope Room. The rooms in question are the dining room ( south), central sitting room and northern bedroom where the Conservation Management Plans confirm evidence of the former gas lighting and have been attributed an exceptional/ very high significance with a low capacity for change.

6.1.3 The proposals seek to retain all three rooms in their current layout, which is welcomed, with internal wall insulation proposed on the southern wall of 100mm, and a bespoke approach on the eastern wall. No details of the insulation has been provided for the southern wall but it is assumed to be the same as insulation on the lower floors. Given the relatively untouched nature of this suite of rooms, and the size of the rooms that are domestic in character, it would be preferable for the internal wall insulation to be the thinner insulation used on the eastern elevation. However the loss of original plaster is not encouraged and has been opposed on other listed building consent applications as the thermal benefits of lime plaster are often under calculated and would not be readily supported without good justification. Nonetheless in this particular instance it is noted that the floor has to be strengthened to accommodate public entry and visitor numbers and this will

involve the removal of plaster at the base of the walls, which will have to be replaced. The loss of historic fabric is not readily supported, however in this instance it has to be balanced against the use of these rooms as a public museum, and the fact that these were rooms not intended for public viewing which will now be available as part of the museum and as such does exhibit great public benefit for the works. As such subject to the slimmer insulation being used on all external walls and the existing cornicing, architrave and picture rail being retained, and the skirting boards being replaced then the works would be supported as they would be considered as a benefit to the heritage tourism facilities within the County. Noting the work proposed in figure 2 of the Structural Report, the full extent of the works to the floor should be detailed.

6.1.4 The use of Fineo 12 glazing is supported.

6.1.5 Whilst there is support for the repair and reuse of these rooms, given the extent of changes proposed it is regrettable that the librarians stairs have to be lost. The Conservation Management Plans indicate the significance of these stairs as very high and the capacity for change very low, and that a conservation approach is needed to repair plasterwork in the stairwell. The loss of this feature has not been justified and whilst fully appreciating that they cannot be used as public access to this floor, it would be substantially preferable if they could be retained adjacent to the new lift, to illustrate the former domestic nature of these upper floors. Ideally the stairs would be visible to but not accessible to the public. It would be useful if the retention of the stairs could be considered as this is the key physical indicator of the fact that the upper floors were in a different use to the lower public floors and of great significance in the evidential, historic, aesthetic and communal value of the building.

6.1.6 I would refer to paragraph 200 of NPPF which advises that 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, and as such the justification for the loss of elements of significance should be adequately justified.

6.1.7 Whilst there is support for the repair and reuse of the rooms facing Broad Street, I would still express concern at the size of the window on the south east elevation that serves a stairwell. The proposed south elevation XX-XX-DR-43302 Rev P02 illustrates the comparative sizes of the proposed and existing windows. Figure 44 of the visual Impact Assessment illustrates the size of the window compared with the other windows in the vicinity. Whilst appreciating that this is to obtain a view of the cathedral, I would respectfully point out that this is from a stairwell. However the gothic arch at the top is the element that draws the eye, and the width on the lower floors could be more readily absorbed into the mass of the walling. I would refer to the reference on page 28 of the Draft Hereford Design Guide in respect of the clear hierarchy of windows with larger openings on the ground floor and smaller windows on upper floors. A reconsideration of the size of this window is again requested.

## **7. Fifth Floor**

7.1.1 The fifth floor is a combination of works to the existing fabric plus an additional storey to the rear sections of the building including a central external café area. The comments below are in respect of the works to this listed building only, and the setting of heritage assets being considered under the planning application 230385/F. However in terms of the works to the roof there will inevitably be a degree of overlap, therefore the comments in terms of the setting of all affected heritage assets are addressed in this section also.

### **7.1.2 Fifth floor –Summary of Areas for Clarification/Amended Plans/Items to be conditioned**

- a) The steel to support this floor has been addressed in previous sections but is of relevance to this floor also.
- b) Details of the soil pipes to be submitted and to be indicated on the floor plans if running internally and on the elevations if externally.
- c) Clarification as to the height of the lift shafts.
- d) The treatment of the Aubrey Street elevation to be reconsidered to be more cohesive in terms of materials and pitch. Given the prominence of the Aubrey Street elevation, and the uncomfortable juncture between the corten steel lift shaft covering and the slate walls, an alternative treatment for this elevation is sought.
- e) Consideration of the windows on the south elevation to represent the design of the arches below and not the veneration gothic of the front of the building.
- f) Changes to the stairwell window requested as amendments
- g) Details of the pv panels – could be conditioned
- h) Materials with particular attention to the brickwork – could be conditioned

## **7.2 Café seating or exhibition 05-022**

7.2.2 These three rooms have been identified as having exceptional/ very high significance with a low capacity for change, and have been identified in the Conservation Management Plan received on 23/03/2023 that these 3 rooms were planned as part of a series of smaller exhibition rooms. However this conflicts starkly with the plans submitted which indicate that the proposed works to this element of the building are extensive and involve the removal of the greatest degree of historic fabric. Fifth Floor demolition Plan Xx-05-DR-A-11162 rev P01, indicates that all the internal walls of the top floor are to be removed, a large section of the rear wall and roof, to create essentially a single space from the existing top floor to link in with the café seating of exhibition space 05-003. A comparison of the existing and proposed south elevations XX-XX-DR-43302 Rev P02 indicates the degree of change proposed.

7.2.3 However the condition of this floor is duly noted and the water damage that has occurred and the repair works that would be required to retain the rooms as is would involve a degree of new fabric. The use of this section of the building would allow views of the cathedral and as such is readily understood. The height of the windows is noted and the steps up to view through the windows is acknowledged.

7.2.4 Usually such radical interventions to a roof of a listed building would not be supported as the visual impact of such works is substantial, in addition to the loss of the historic fabric. However I note that the front section of the building has evolved to take these concerns into consideration. I am also mindful that the museum was transferred in the 18070's to the City Council by James Rankin president of the Woolhope Naturalists Field Club who bore £6000 of the costs. ( source An ornament of the City – 125 years of Hereford Free Library and Museum), and as such the building was designed and gifted as a museum for the city and should remain as such. Nevertheless in less philanthropic times the building has to bring in revenue to support itself with a change of use and alternative site for the museum not being desirable, even if possible, as the history and significance of the building is that of a public museum. The lack of land associated with the museum is also noted with no opportunity to expand in any direction apart from vertically.

7.2.5 As such the works to the front section of the building to enable a large space with views to the cathedral is not opposed in principle as it would bring public benefit to the building and provide economic support for the retention of the building as a museum

7.2.6 In terms of the design and materials, the roof is a flat roof, with slate hanging on the sides, so will read as part of the roof, and the public lift has been considered carefully to have corten steel

cladding on essentially a square structure, which in addition to tying this material into material used elsewhere will also mirror the red brick of the chimneys in its shape, and is a good choice in material for this location. The choice of slate shape on the walls is well considered as it adds texture which in part disguise the fact that it is not a roof but walls. However the materials are a key consideration and should be conditioned to ensure that they are as expected. Great care will be needed in the new brickwork to ensure that it matches, colour, texture, size, brickbond and mortar width to the existing brickwork.

7.2.7 I note the pv array on the roof, and full details and colour of these should be submitted as it will be visible from the cathedral tower. Ideally a matt black pv panel would be preferred.

7.2.8 The window to the stairwell has been mentioned previously and the size and height of the gothic arch is not supported as this introduces a large feature which whilst breaking up the elevation and adding a degree of verticality is disproportionate and again only serves a stairwell. Figure 44 of the Visual Impact Assessment, and Exterior Curtain walls XX-XX-DR-A-22640, illustrates the size of the window compared with the other windows in the vicinity. Could an amended design for the window be considered ideally not projecting above the brickwork of the front section of the building unless flat to the "roof" slope. Possibly the omission of the corten steel projection surrounding would also assist by making this window less of a feature and possibly a slate colour frame would be beneficial.

7.2.9 The wc provision for the café is noted, however these are sited above the Exhibition room 03-03 on the third floor with the ornate trusses and vaulted ceiling and the exhibition 01-00 on the ground floor with the mezzanine. No details of the soil pipes and where they will be sited internally has been provided, and noting the architectural details of these rooms, the details of the soil pipes should have accompanied the application and identified on the floor plans if internally and on the elevations if externally.

7.2.10 Similarly the wc provision at the west end should have similar clarification.

### **7.3 Lower Terrace**

7.3.1 This would be a newly created space sited behind the curtain wall, and being open air provides a visual break in the roof line when viewed from the west front of the cathedral. Overlooking will be considered by other parties and in terms of built heritage only there is no objection to this element of the proposal.

### **7.4 Fifth floor education space 05-006**

7.4.1 This will be a newly created floor above the current art gallery formed by the removal of the 1912 roof. It is flat roofed to provide a roof terrace above. However it is noted that the education space is approximately only half of the space create with approximately a quarter being used for the service lift and fire escape stairs, and the other quarter the access to the roof terrace.

7.4.2 This element of the building designed has evolved to now have slate hanging on the walls to replicate a slate roof to minimise the visual impact of this room. In terms of elevational treatment, I would question the venetian gothic windows on the south elevation as, the 1912 part of the building did not follow the venetian gothic of the Broad Street frontage. In addition the general rule is that windows generally decrease in size the higher up the building the windows are, such as the Broad Street frontage where there is a recognised hierarchy of window sizes reflecting their functions. The use of venetian gothic openings is not encouraged as it relates to the Broad Street frontage and not the Aubrey Street frontage, and the size is discordant with the upper floor windows on the Broad Street section of the museum. As an alternative on the south elevation it is suggested that the head

of the windows be a shallow arch to mirror the windows in the current library below. This would separate the roofscape to the Broad Street section, the Aubrey street section and the central section, which in addition to dividing the visual mass, would relate more readily to the 1912 section of the building. Noting the cross sections in section c-c XX-DR-A-45510 rev P02, it is not considered that loss of the upper section of the gothic arch to reflect the arch of the window below would reduce the viewing area of the majority of people within this room, however would greatly improve the external appearance, both when viewed from Aubrey Street, King Street and the junction with Bridge Street where the venetian gothic of the Broad Street frontage is not readily visible. The lessening of the height of the window would also reduce the dominant impact that the windows would have when viewed over the roofs of adjacent buildings as illustrated by figure 47 of the visual Impact Assessment. It is noted that in the Archaeology and Heritage Desk based Assessment, in the assessment of the views from the cathedral tower 9.2.10 that the dormer windows and rooftop colonnade will be seen in the same view as the Broad Street frontage, which is concurred. However, it is also confirms that this is the least publically accessible viewpoint which is also concurred. As such the rationale for the Venetian gothic windows on the south elevation of the 1912 extension is not readily understood and it is considered that the fifth floor windows should relate to the windows to the 1912 extension as a more readily accessible viewpoint would be the view from King Street and Aubrey Street where the Broad Street elevation is not visible.

7.4.3 In terms of the Aubrey Street frontage, this elevation has changed from pre-application discussions by the provision of the lift to the fifth floor. This has resulted in an uncomfortable square box projecting in the north west corner of the building, which is accentuated by a change in material, and is visible on both the west and south elevation, and as such will be readily visible on the approach along Barton Street and King Street. I note that the view from Barton Street has not been included in the Visual Impact Assessment, although was identified as a key view during pre-application discussions. Nonetheless it is considered in plate 7 of the Archaeology and Heritage Based Assessment. However, it is not clear if the representation on plate 7 is entirely accurate as the new roof appears to be sited behind the existing roof which is to be removed. As such it is not considered that the impact will be not as depicted in plate 7.

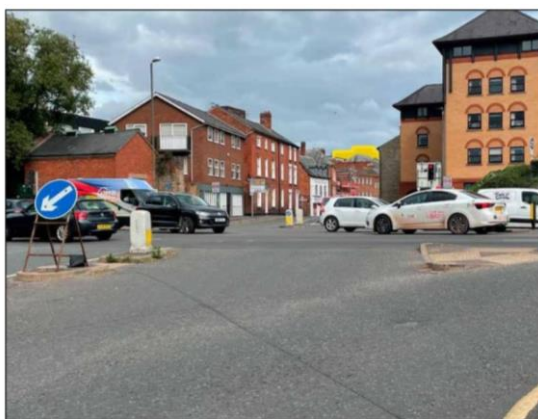
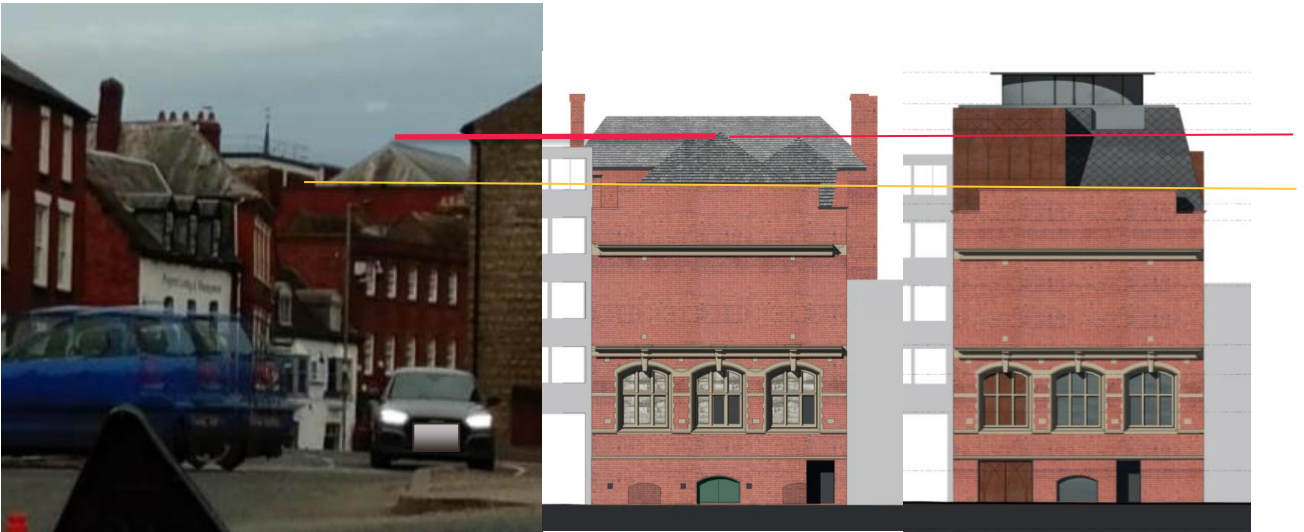


Plate 7: View looking ENE from the site of the medieval St Nicholas Gate



Figure 4 plate 7 from Visual Impact Assessment

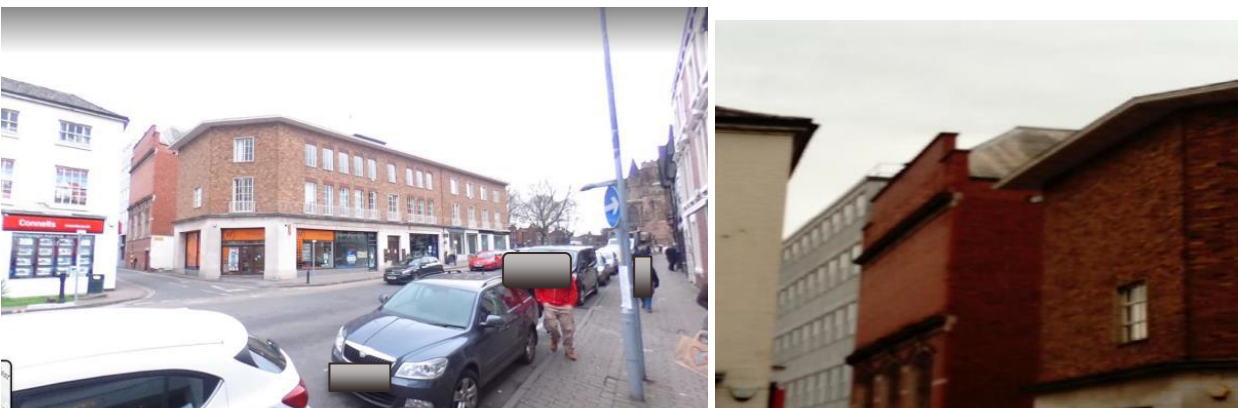
7.4.4 However the roof will be more visible than indicated sited immediately behind the brick parapet, as a comparison with a photograph taken from the traffic lights at Barton Road, compared with the existing elevations and the proposed elevations indicate. The red line indicates the height of the existing ridge of the 1912 section of the building and the red line the existing parapet. All Saints Church spire grade II\* is visible on the left hand side of the photograph and Berrington House grade II\* in the left foreground



Photograph 13 view from southern side of Barton Road Figure 5 existing and proposed Aubrey Street elevations



Photograph 14 view of existing museum roof from King Street



Photograph 15 and 16 Aubrey Street elevation of museum viewed from King Street



7. 4.5 At this key gateway into the city that affords a view of the rear of the museum, this elevation has to be carefully considered. Whilst the elevational drawings of the existing roof may be accurate, they are by their nature 2 dimensional, and the height and impact of the existing 1912 roof, is not always adequately represented in a 2D drawing, as the 1912 roof stands more prominent than the other pitched roofs to the rear of the museum, which is difficult to illustrate 2 dimensionally. However photographs or viewing from King Street and the corner of Bridge Street illustrate the existing roof scape. Being in 2D the drawings suggest that the main roof of the museum is the dominant roof when considering the rear elevation, however this is not the case due to the complex change in levels and the size of the roof. In some locations the main museum roof is not visible such as the photographs and plate 3 of the Archaeology and Heritage Based Assessment.



Photograph 17 current visibility of all the museum roof viewed from corner King Street/Bridge Street



Figure 6 existing and proposed elevations on southern elevation facing King Street.

7.4.6 Notwithstanding the information submitted it is considered that the new roofscape will be visible from many important locations and as such has to be very carefully considered. It is noted from the Archaeology and Heritage Based Assessment on page 9 that the height of the pop-up for the goods lift and main passenger lift is still to be confirmed. As such the eventual height may be different to that indicated on the plans and in the assessments. Noting the proposed roof plan on drawing XX=RF-DR-A-41170, which indicates the flat roof of the lift directly adjacent to the viewing platform. Proposed Sections 5 and Roof Terrace LP2303-FIR-OO-ZZ-DR-L-7001 is a cross section through the parapet and the Beacon tower, and does not indicate the lift shaft, but drawing B-B-XX-XX-DR-A-45505 rev P02, does illustrate the relative height of the lift shaft to the public viewpoint. It is anticipated that the height of the lift shaft may need to be raised for obvious reasons. As such the final height would need to be considered at this stage. The smaller lift may be less of an issue, due to its size and location.

7.4.7 The King Street View of the cathedral was identified as one of the key views on page 48 of the Hereford Design Guide Supplementary Planning Document. This document also suggests that flat roofs are not an appropriate detailing on page 51.

7.4.8 In addition the mix of materials facing Aubrey Street elevation is not considered appropriate given its location and high visibility. With that in mind it is requested that the west elevation be reconsidered to have a more cohesive design and material. Amended details in respect of the lift height and Aubrey Street elevation are therefore requested in this regard.

## **8.1 Roof Terrace**

8.1.1 It is considered that there are 2 elements to the proposed roof terrace to be considered, the roof structure itself and the staircase beacon tower atop the roof terrace. The roofscape of the city has to be addressed not only in terms of the setting of the host listed building but the other designated assets.

8.1.2 I would refer to paragraph 200 of NPPF which advises that 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 assets of the highest significance, grade I and II\* listed buildings, should be wholly exceptional.

8.1.3 In accordance with paragraph 195 of NPPF, I would refer to the guidance prepared by Historic England The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning Note 3, [HEGPAN 3] in respect of how to assess setting, which should have been utilised in the assessment of the setting of heritage assets.

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

8.1.4 The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework as “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.”

8.1.5 Significance is defined in the Glossary of the National Planning Policy Framework as. “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting”.

8.1.6 Historic England The Setting of Heritage Assets – Historic Environment Good Practise Advice in Planning Note 3, [HEGPAN 3] advises 5 steps to be considered when assessing setting.

1. Identify which heritage assets and their setting are affected.
2. Assess whether, how and to what degree these settings make a contribution to the significance of the heritage assets.
3. Assess the effects of the proposed development whether beneficial or harmful on that significance,
4. Explore the way to maximise enhancement or minimise harm
5. Make and document the decision and monitor outcomes.

### **8.1.7 Step 1.**

8.1.8 The building is prominently sited within the Hereford Central Conservation Area, which contains a high number of listed buildings. Rather than list them individually, I am attaching a map extract from the Historic England website, <https://historicengland.org.uk/listing/the-list/map-search?clearresults=true#?search>, however the relevant grade II\* and grade I listed buildings in closest proximity only will be listed below.

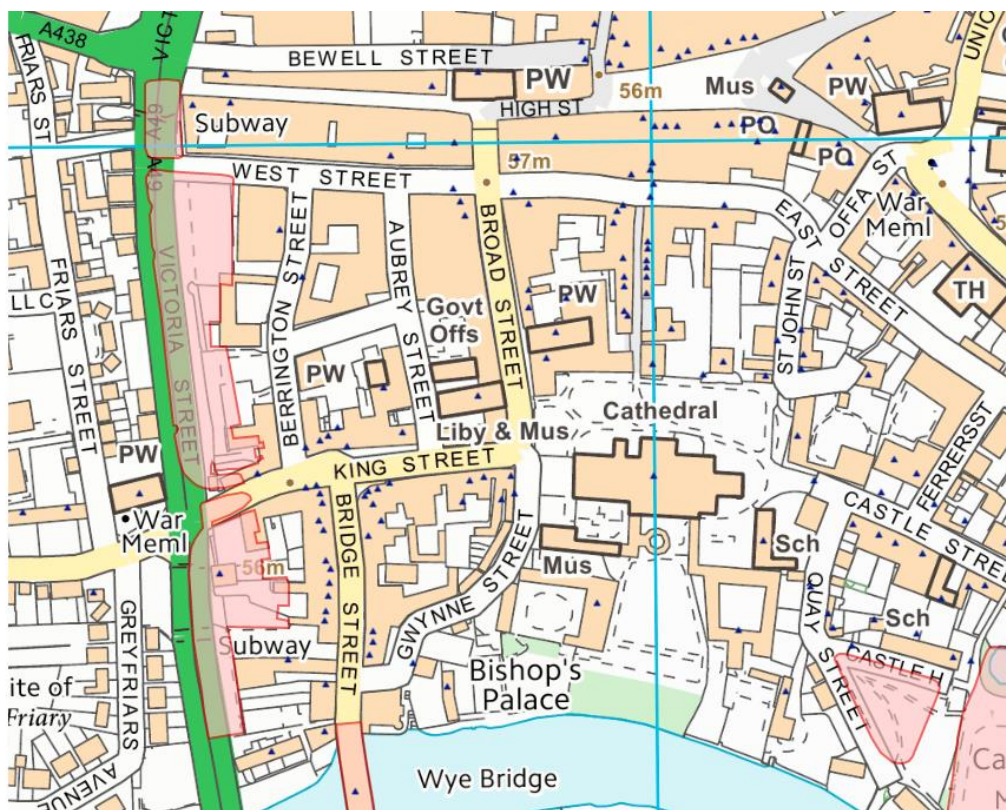


Figure 7 Extract from Historic England website indicating the listed buildings by blue triangles and scheduled monuments in red.

#### **Grade I**

UID 1196808 Cathedral Church Of St Mary And St Ethelbert

UID 1196809 College Of Vicars Choral

#### **Grade II\***

UID 10255105 Church Of All Saints

UID 1052295 Palace Chambers King Street

UID 1196802 Junior House of Cathedral School  
UID 1297462 Church of St Francis Xavier  
UID 1279761 Berrington House  
UID 1205588 41A Bridge Street  
UID 1297419 Greyfriars Surgery

Grade II

As on the attached map on Broad Street, King Street, Bridge Street, Aubrey Street and Wye Terrace .

It should be considered that whilst Herefordshire County has over 6000 listed buildings, only 131 are grade 1, that is 2% of the listed building stock, and 363 are grade II\* that is 6%, with the vast majority being grade II.

**8.1.9 Step 2 Assess whether, how and to what degree these settings make a contribution to the significance of the heritage assets.**

8.1.10 The second stage of any analysis is to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.

8.1.11 The assessment should consider the key attributes of the heritage asset and then consider;

- the physical surroundings of the asset, including its relationship with other heritage assets
- the asset's intangible associations with its surroundings, and patterns of use
- the contribution made by noises, smells, etc to significance, and
- the way views allow the significance of the asset to be appreciated

8.1.11 To assess the physical surroundings the following should be considered;

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

8.1.13 The experience of the asset needs to consider;

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness' Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations

- Traditions

8.1.14 The built up form of the conservation area contains both listed and unlisted buildings clustered primarily within the former city walls, on streets that have been in existence for centuries with some streets wider than others. The heights of the buildings has remained relatively uniform and not higher than 5 storeys with the exception of church spires. Given the proximity of listed buildings to each other, and the fact that several are in in the same view, an assessment of the setting of the listed buildings has been undertaken in viewpoints rather than individual listed buildings. I note that the Visual Impact Assessment takes a wider views of the city into consideration, and the Archaeology and Heritage Based Assessment addresses some individual buildings. Both will be considered under section 3

**8.1.15 Step 3. Assess the effects of the proposed development whether beneficial or harmful on that significance.**

8.1.16 The application has included a Visual Impact Assessment of many views including long distance and also an Archaeology and Heritage Based Assessment identifying key views.

**8.1.17 Key View 1 South Aisle West door of the Cathedral ( Visual Impact Assessment and Archaeology and Heritage Based Assessment )**

8.1.18 Both Visual Impact Assessment assesses and the Archaeological report start with this view. The Visual Impact Assessment considers that the height does not rise above the front elevation. This is not entirely correct as the viewing beacon tower and potentially the top of the lift shafts will be above the ridge line. However relative height is also not the only consideration that should be utilised in assessing setting, and how setting is experienced is also a key consideration.

8.1.19 Figure 45 illustrates the current viewpoint, and Figure 46 the proposed view. Currently the Museum is a tall 5 storey frontage building, with views over the building on the corner of King Street and Broad Street. The increase in height will change the experience in that the increase in height will be noticeable and could result in an over dominant affect on this section of the cathedral grounds.

8.1.20 I note plate 2 of the Archaeology and Heritage Based Assessment, where it is considered that any visibility would additionally be mitigated albeit on a seasonal basis by 2 trees on the W side of the Cathedral Close. Whilst the trees will obscure some views of the Museum this is primarily of the front elevation, and not the southern elevation, and only when in full leaf. The middle section of the museum is readily visible from the cathedral grounds from many locations and through the trees when not in leaf.



Photograph 18 view of the Broad Street and side elevation of Museum from cathedral grounds

8.1.21 It is considered that the proposal will have an impact on the way in which the cathedral close is experienced and the immediate setting of the Cathedral.

8.1.22 Key View 2 Corner of Bridge Street and St Nicholas Street/King Street ( Visual Impact Assessment)



Photograph 19 view of current museum



Figure 8 extract from application of same view.

8.1.23 This view illustrates the impact that the proposal will have on the conservation area and it is noted that listed building UID 1187249 22 King Street will have the new roof directly above it. 22 King Street is described as *House, now shops and offices. Late C18 front to C17 core. Brick; composite tile roof; reduced brick end stack. 3 storeys and cellar* and is identified by the yellow arrow.

8.1.24 The assessment of the Archaeology and Heritage Based Assessment in plate 3 considers the view from a similar location, and considers that this viewpoint is the one from which the proposed rear roof extension can be most clearly seen rising above the three-storey buildings of brick with slate pitched roofs on the corner of Aubrey Street.



Plate 3: View looking NE from the corner of Bridge St and King St.



Photograph 20 extract from heritage appraisal

Photograph 21 same view slightly different location along King Street

8.1.25 This statement is agreed with, in that the proposed roof extension will be visible above the listed building, however whilst the demolished St Nicholas Church and the subsurface archaeology was referenced, the impact on the setting of this listed building has not been assessed. It was confirmed that whilst the current museum roof is larger than the 3 storey listed building the slope of the roof recedes into the city skyline, and that the proposed roof extension had been designed to maintain the pitched roof forms, colours and textures consistent with traditional building forms and materials. This statement is not concurred with, as whilst glass is found in the city roofscape, it is usually on smaller elements, such as glazed roof such as the Post Office, or the dome of St Francis Xavier, or individual rooflights. The use of glass for a free standing tower is not prevalent in the city skyline, nor corten steel. In addition whilst slate has been used to clad the walls, it is also the roof shapes that represent the city skyline, the bulk and mass of the roofscape and the pitch not just the materials. It is considered that the proposal would result in a rather dominant and overbearing neighbour in way that is not experienced currently. In addition the impact on the setting of the museum itself has not been assessed from this viewpoint. I would refer to Hereford Design Guide which advises that is a new roof is proposed particular attention should be given to its proportions, height, pitch materials and colour.

#### 8.1.26 Key Viewpoint 3 King Street opposite Aubrey Street (Archaeology and Heritage Based Assessment)

8.1.27 The setting assessment confirms that *From most viewpoints along King Street, the proposed new roof is screened from view along most of King Street but from this angle, there would clear visibility, although no landmark buildings would be affected.* This statement is not concurred with as the Visual Impact Assessment in key View 2 clearly illustrates that the new roof is not screened from view as it would be visible above the roofs of King Street, and photographs taken illustrate that the existing museum roof is clearly visible and as such the roof extension will be equally if not more visible than the existing.

#### 8.1.28 Key Viewpoint 4 Junction of Berrington Street and Little Berrington Street ( Archaeology and Heritage Based Assessment) Key View 3 of (Visual Impact Assessment)

8.1.29 The Visual Impact Assessment confirms that from this view the cathedral is blocked more by the proposed beacon which does dilute the connection between the Aubrey Street Quarter and the cathedral. The Archaeology and Heritage Based Assessment considers this view along similar lines in that *from this view the cathedral would be partly obscured by the proposed beacon, which is considered to diminish the link between the cathedral and the early medieval Berrington Street-Aubrey Street plan unit representing the late 8th century/early 9th century undefended settlement.*

8.1.30 These assessments are agreed with, in that the cathedral is currently visible over the museum roof, however after construction the view will be less. The cathedral was the most important building in the daily life of residents of the city, and the proposal will impact on the views of the cathedral from this area, which will then reduce the visual links between the sites.

8.1.31 I would refer to paragraph 200 of NPPF which advises that 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 assets of the highest significance, grade I and II\* listed buildings, should be wholly exceptional.

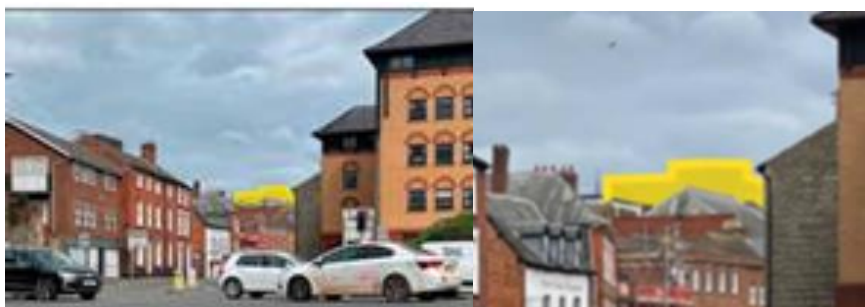
8.1.32 However the impact on the setting of UID 1279411 21A King Street has not been assessed, although this view was identified. A house of the Late C18/early C19 remodelling of late C17 timber-frame; restored C20. Brick; timber-frame; slate roof; brick end stacks. Central staircase plan. 2 storeys, attic and cellar. This property is visible between properties on Berrington Street where views of the cathedral can also be glimpsed.

8.1.33 The museum roof is currently not visible from the Little Berrington Street car park, although the adjacent property is visible which indicate the roof height. It is considered that the proposal will be visible from this location and will appear over the roof of UID 1279411 21A King Street, which is in proximity to UID 1187249 22 King Street when viewed from the rear car park. An assessment of the setting of these listed buildings has not been made.

8.1.34 Key View 5 – Opposite St Nicholas Church corner of Friar Street. Archaeology and Heritage Based Assessment) Key View 7 of (Visual Impact Assessment)

8.1.35 This view point has been addressed above when considering the Aubrey Street elevations under the comments regarding the Fifth floor education space 05-006.

8.1.36 I would point out that the viewpoint provided has been taken from the southern side of Barton Road, however an assessment of the view from the northern side of Barton Road was requested. That is the view when stationary at the traffic lights facing Nicholas Street, which provides a very different viewpoint. In addition the visual image submitted is set behind the existing slate roof, whereas the existing roof will be lost, and as such the new build will directly from the parapet on Aubrey Street.



Figures 9 and 10 extract from the Visual Impact Assessment from the southern side of Barton Road



Photograph 22 from northern side of Barton Road illustrating gap

Figures 11 & 12 existing & proposed Aubrey Street elevation

8.1.37 This key point entering the Nicholas Street/King Street has been missed from the appraisal and without Deen Court framing the building on the southern side of the photograph/image presents a different view when there is space between the buildings able to be viewed.

8.1.38 The comments within the Visual Impact Assessment that whilst the mansard roof and top of the viewing beacon will be visible although the materiality of the new roof form will be in keeping

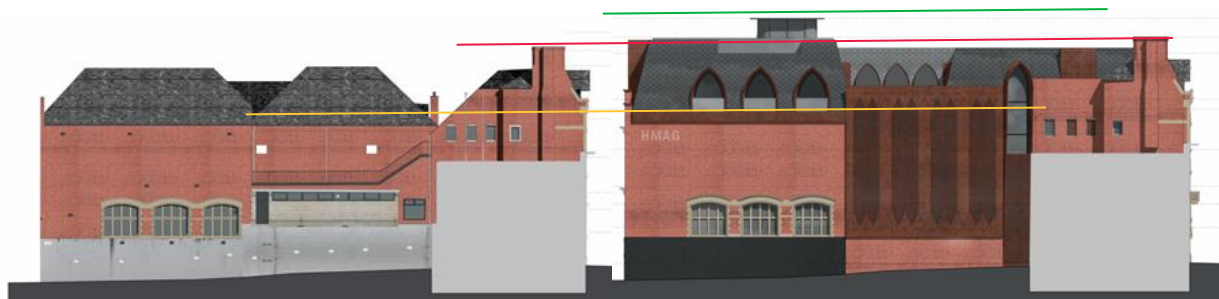


with the historic roofscape is not agreed with. The slate roof to the top of the roof terrace parapet will be on a wall not a roof and as such presenting a relatively flat wall appearance not a pitched roof, to approximately the red line of the attached photograph. The glass beacon which would be the height but not the width of approximately the green line on the photograph is not a material readily visible on the roofs of buildings. In addition the height is greater than the surrounding buildings.

8.1.39 Key View 5 St Francis Xavier Church Broad Street (Archaeology and Heritage Based Assessment) and Visual Impact Assessment  
Key View 6 All saints Church Broad Street (Archaeology and Heritage Based Assessment)  
Key View 11 and 12 Visual Impact Assessment

8.1.40 The consideration in respect of the view from Broad Street is agreed with in that it is not considered that the new built will be highly visible from Broad Street. However, it is worth clarifying that the impact on St Francis Xaviers and All Saints previously raised previously was not the view from Broad Street, but the view from Greyfriars Bridge where the glass dome of St Francis Xaviers is visible, adjacent to the cupola on the former Post Office in Broad Street, and between the spire of All Saints and the Cathedral.

8.1.41 It was the longer distance views of St Francis Xaviers dome and the cupola of the post office that were requested. These traditional features breaking through the traditional pitched roofs add interest and vitality to the city roof scape. The Museum chimneys are approximately identified by the red line which will be the height of the parapet of the roof terrace and the green line approximately identifying the height of the beacon tower. However The Visual Impact Assessment has identified this viewpoint in key view 11.



Figures 12 & 13 existing and proposed southern elevations



Photograph 23 view from Greyfriars Bridge

8.1.42 The ridge of the existing museum and the chimneys can be clearly seen from this viewpoint, although not readily recognised as the museum. This was a viewpoint identified as requiring careful consideration. Whilst noting that this viewpoint has picked up All saints Church and St Francis Xaviers, clarification is sought in respect of this viewpoint. The parapet of the roof terrace is comparable with the heights of the chimneys, with the beacon tower being above. However the illustration in Key View 11 seems to suggest a lower height.



Figure 14 extract from Key 11 of the Visual Impact Assessment

8.1.43 Key View 7 Wye Bridge (Archaeology and Heritage Based Assessment)  
Key View 9, 10, 14 15 Greyfriars Bridge Visual Impact Assessment

8.1.44 The assessment is noted, however again it was not necessarily the view from the bridge that was the only consideration but views of the bridge from the adjacent Greyfriars Bridge, where the museum is visible and/or with the flat roof on the neighbouring building providing a base line for the visibility. The visual Impact Assessment has viewed Wye Bridge from Greyfriars bridge in the

8.1.45 Clarification is sought in respect to Key view 9 in the Visual Impact Assessment which suggests that none of the roof including the Beacon Tower will be higher than the chimney of Wye Terrace.



Figure 15 extract from Visual Impact Assessment

Photograph 24 taken from similar viewpoint

8.1.46 However as the roof of the 1912 section of the museum is already visible above the rooftops of Wye Terrace, and the proposed increase in height, clarification if this indication is correct is sought. It is note that key views 14 and 15 of the Visual Impact Assessment quite accurately indicate a different height than key views 9 and 10 as a different view point is afforded on the north bound side of the bridge, and in the direction of traffic plus pedestrians so both sides of the bridge quite rightly have been considered.



Photograph 25 viewpoint with museum roof indicated.



Fig 16 existing & proposed Aubrey St elevation

### 8.1.47 Key View 8 Cathedral Tower (Archaeology and Heritage Based Assessment)

8.1.48 This viewpoint submitted by the Archaeology and Heritage Based Assessment is more a consideration of the view from the cathedral tower which is available to visitors to climb and the views available from the tower and how the experience of setting only from the tower rather than also considering the visual setting that is assessed by the views from the ground provided by the Visual Impact Assessment.



Photograph 26 view taken from cathedral tower



Fig 17 extract from Key View Archaeology & Heritage Based Assessment

8.1.49 The roof of the museum is readily visible from this viewpoint and it is noted that pre-application concerns in respect of visible plant on the roof appears to have been taken into consideration in the design sited internally on the northern wall to minimise impact, and it is assumed that plant and services will not be visible from this viewpoint, which would be useful to be clarified. However the pv array will be visible from this viewpoint and potentially from the roof terrace and further details in respect of the pv array should be provided and a matt colour preferred. However the location of the beacon tower is noted in that it is between the majority of the roof terrace and the cathedral thereby potentially reducing the views of the cathedral from the roof terrace in a number of locations. Considerable care should be taken in the consideration of materials of the upper floors.

#### 8.1.50 Key View 16 Greyfriars Bridge Visual Impact Assessment

8.1.51 The flat roof extension of the neighbouring property is readily visible along long stretches of Victoria Street recognisable by the change in materials and the flat nature of the roof, and the museum roof is also visible from several locations and almost continuously from the north bound pavement, and I duly acknowledge the number of viewpoints provided from Victoria Street that have been provided that reflect the continuous visibility of the building currently afforded.

### **9. Consideration of setting**

9.1 The Visual Impact Assessment identifies that the roof and beacon will be seen over the roofs cape of Hereford when viewed from the south, and west.

9.2 I duly note the conclusions on page 49 of the Archaeology and Heritage Based Assessment however would not concur with the conclusions.

9.3 The impact of the works on the Museum and Art Gallery has been considered in that document as slight to moderate, based on the high significance of the building cross referenced against the impact of the works which was assessed as minor. It cannot be concluded that the loss of the majority of the original roofs, and a new storey with roof terrace and viewing beacon above would be considered as minor, as the works proposed are clearly extensive. In addition this would conflict starkly with the assessment in the Heritage Statement which assesses the level of intervention of the roof works to be major and the overall impact very large and that the vertical

extension to the rear of the building is a significant change to the building. No rationale or explanation for the differing weightings was given.

9.4 Whilst not agreeing that the impact on the museum is slight, this is not the weighting within National Planning Policy Framework which provides only 3 levels of harm; Substantial Harm, less than Substantial Harm, and no harm. Case Law on the subject is provided by R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019] EWHC 2899 (Admin) where it was concluded that only the three graduations of harm in NPPF apply in heritage terms and even limited or negligible harm amounted to less than substantial harm. The judgement clarifies that this level of harm is sufficient to engage the heritage paragraphs within the NPPF. Whilst not agreeing with the weighting it is noted that a consideration of slight to moderate harm by the proposal is still confirming that harm has been identified.

9.5 The statement that *“the flat roof design of the extension would be out of keeping with the generally textured roofscape of the conservation area but in mitigation the impact is offset by the fenestration and the observation beacon which would conserve its overall character and complements the character and quality of the historic skyline as representing a new element of use and will use materials of a similar type and texture and suitably modest colour palette”* is noted but not agreed with. The materials have been discussed previously, as has the scale of fenestration and it cannot be agreed that a glass tower projecting above the skyline would conserve its overall character or complement the character and quality of the historic skyline.

9.6 A recent appeal in the city for a 20m telecommunications mast planning reference P/213379/PA7 was dismissed, in dismissing the appeal the Inspector noted that the spire of the Church of St Peters was a prominent feature across much of the city centre's townscape, with the significant and special interest of this Church deriving from its stature, architectural design and detailing, along with its historic role as a social and spiritual focal point within Hereford, and that the proposed development would detract from the views of the church spire. In respect of the height it was noted that due to the overall height it rises significantly above the majority of the built form such that there is likely to be a degree of inter visibility between the proposed development and other nearby listed buildings. The appeal was dismissed as a result of the harmful effect on the setting of the conservation area, Scheduled Monuments, Area of Archaeological Importance and listed buildings, and the harm to each asset was deemed to be less than substantial, and in applying the balancing act of NPPF paragraph 202 weighed the harm against the public benefits of the proposal. The height of the refused mast was 20m, which is comparable to the height of the Beacon Roof at 20.2m.

9.7 The Archaeology and Heritage Based Assessment report assesses the impact on the cathedral and cathedral close as moderate to slight, reflecting the high significance of the church cross referenced against the magnitude of impact and is assessed as minor.

9.8 The overall impact of the proposed development on the setting of All Saints church has been assessed as slight, reflecting the high significance of the grade II\* listed building referenced against the magnitude of impact as negligible.

9.9 These calculations are not agreed with. However whilst not agreeing with the weighting it is noted that a consideration of slight to moderate harm by the proposal is still confirming that harm has been identified, and it should be noted that this level of harm is sufficient to engage the heritage paragraphs within the NPPF.

9.10 Paragraph 200 of NPPF confirms that 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.

9.11 It is also noted that not all listed buildings have been assessed in the consideration of their setting.

9.12 Whilst not agreeing with the weightings given, the reports submitted have identified harm to the setting of listed buildings of all designations. The wider impact on the conservation area is also a matter for consideration as in addition to the statutory duty to protect the setting of listed buildings under section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, Section 72 of the same Act which places a duty on Local Planning Authorities when determining planning applications to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. The extension would not be considered to preserve, and the removal of historic fabric and its larger replacement would not usually be considered as an enhancement of the character or appearance.

9.13 The proposal would have to be considered against legislation, national policy and local documents.

9.14 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local planning Authorities under;

Section 16 of the Act that *In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.* The extent of historic fabric removal is duly noted included elements previously and currently considered as being of high significance, i.e. the ground floor layout at the Broad Street frontage, the librarian stairs, the vaulted ceilings.

9.15 Section 66 *“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

The loss of features of special architectural or historic interest is noted and in terms of setting, it is not sufficient to merely consider the impact of the setting of listed buildings the local planning authority has a duty to have **special regard**. The Court of Appeal decision in the case of *Barnwell vs East Northamptonshire DC 2014* made it clear that in enacting section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 Parliament's intention was that 'decision makers should give **“considerable importance and weight”** to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

<http://www.bailii.org/ew/cases/EWCA/Civ/2014/137.html>

9.16 Section 72 requires Local Planning Authorities, in the exercise, with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. The House of Lords in the *South Lakeland* case decided that the *“statutorily desirable object of preserving the character of appearance of an area is achieved either by a positive contribution to preservation or by development which leaves character or appearance unharmed, that is to say preserved.”*

[https://www.preston.gov.uk/media/11325/G6-cd-6-15-south-lakeland-district-council-v-sse-and-another-respondents-house-of-lords-30-jan-1992/pdf/G6\\_cd-6-15-south-lakeland-district-council-v-sse-and-another-respondents-house-of-lords-30-jan-1992.pdf?m=637927813943870000](https://www.preston.gov.uk/media/11325/G6-cd-6-15-south-lakeland-district-council-v-sse-and-another-respondents-house-of-lords-30-jan-1992/pdf/G6_cd-6-15-south-lakeland-district-council-v-sse-and-another-respondents-house-of-lords-30-jan-1992.pdf?m=637927813943870000)

9.17 The proposed works to the roof would not be considered as preservation, and as such the duty is to enhance the character or appearance of the conservation area. Historic England provide guidance on this matter, "*in a number of ways the policies in the NPPF seek positive improvement in conservation areas. Most explicitly paragraphs 197 and 206 require that local planning authorities should take into account "the desirability of new development making a positive contribution to local character and distinctiveness". The design policies further reinforce the objective of enhancement of an area's character and local distinctiveness, concluding that "significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area so long as they fit in with the overall form and layout of their surroundings (paragraph 134).*"

<https://historicengland.org.uk/advice/hpg/decisionmaking/legalrequirements/>

9.18 Whilst noting the design aspirations, it is not conclusive that additional floors so designed would make a positive contribution to local character and distinctiveness, as it is markedly different to the local character and distinctiveness of the city skyline, and outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area are permissible only as far as they fit in with the overall form and layout of their surroundings. It is not considered that the roof height and in particular the proposed beacon would necessarily fit in with the overall form and layout of its surroundings.

9.19 National legislation is repeated in local policies and document's

9.20 Core Strategy Polices in LD4 require the Protection, conservation and where possible enhancement of heritage assets and their settings in a manner appropriate to their significance through appropriate management, uses and sympathetic design. However Hereford city skyline is protected by Core Strategy Policies including HD2 which requires new developments to enable the protection conservation and enhancement of Hereford's heritage assets, their significance and setting, including archaeology, with particular regard to the historic street patterns and the skyline.

9.21 Hereford Design Guide SPD in the first section on skyline references the flat tower of the cathedral and the 2 church spires visible from strategic views surrounding the city, and that this trilogy of townscape markers shapes long views to the city's skyline and the relationship between these should be maintained and carefully considered as new developments come forward. This does not mean that new additions cannot contribute positively to the skyline but they should not interfere with the harmony of the composition or the prominence of the trilogy. The proximity of the beacon tower to the cathedral and All Saints is duly noted and it is considered that the height and position would interfere with the harmony of composition.

9.22 The Design Guide identifies areas which could accommodate changes to the skyline which exclude the central conservation area, and provides 3 key considerations. New development should not:

- Cause an unacceptable impact through overbearing scale in the foreground or background of existing landmarks;
- Cause an unacceptable impact in the direct foreground or background of existing landmarks by masking or overlapping these; or
- Cause unacceptable impact within the 'trilogy' setting of the key landmarks.

9.23 The scale of the development when viewed from King Street/Barton Street has previously been identified. Key view 3 as identified in the Visual Impact Assessment identifies that the view of the cathedral will be interrupted by the beacon tower, and key view 17 illustrates the view from Riverside Walk. The skyline viewed from the south is dominated by the cathedral tower and the spire of All Saints Church, with the rooftops and chimneys below. Key views, 9,10, 11,12, 13,14,15,16, all illustrate how the proposal would project above the rooftops usually between All

Saints Spire and the Cathedral and therefore have an impact on the 2 prominent landmarks of the skyline.

9.24 The significance of the city's skyline has been repeated in many documents most recently the Hereford City Draft Masterplan which identifies that the skyline remains as it has been for centuries dominated by the cathedral and city centre churches. As such the erosion of that historical skyline should be carefully considered.

#### **10.1 Step 4. Explore the way to maximise enhancement or minimise harm**

10.2 Step 4 enables a consideration as to whether harm identified by the previous steps can be minimised.

10.3 Whilst noting the fact that for ease of identification and therefore consideration the proposed works have been helpfully been identified as yellow in the Visual Impact Assessment, However the materials will be slate corten steel and glass beacon. Due to its location the glass beacon tower will be the most visible element of the proposal when viewed from all identified locations, and the size, flat roof and materials will make this structure not be absorbed in to the lower roofline of the neighbouring buildings.

10.4 The roof extension will also be visible from many viewpoints rising above the roofline of listed buildings in Wye Terrace, Bridge Street and King Street. However whilst a very large structure the slate material palette could potentially recede and be absorbed into the roof scape. However this is in terms of the building itself, and the illusion of a pitched roof is lost when the roof terrace is occupied with people viewing over the parapet, and any installations on the roof, such as planting or seating that would be required. Therefore such a feature of the height proposed in such a sensitive and visible location requires careful consideration. However the building is a public building bequeathed to the city, and noting the business model and the rationale for the roof terrace, the degree of public benefits in respect of the heritage and understanding of the history of the city by enhanced museum facilities are duly recognised. As such it is considered that with revisions to the details of the walls to the rear 1912 extension that the harm identified could be lessened. I would refer to section 4 of the Hereford Design Guide page 50 that advises that terraces, green roofs or rooftop gardens should take into account of their visibility from ground level. Noting the height of the parapet its is considered that people and planting will be visible from the ground.

10.5 However in terms of the Beacon Tower, its height, size, design and materials will render this feature as a modern intrusion in to the historic skyline to a degree that could not be supported and would be considered to be contrary to national legislation, policy, guidance and Core Strategy Policies HD2, LD1 and LD4.

10.6 In addition the size of the beacon tower is noted when considering the new firth floor, and it takes up around a third of the floor space of exhibition space 05-006. The stairs are very wide, with a central 2 storey void, creating a structure that is large for its function as a staircase. Drawing number LP2302-FIR-00-ZZ-DR-L-2001 illustrates the amount of roof terrace that would be taken up by the stairwell to reach the roof terrace. Whilst noting that this also includes a viewing area, presumably to view in inclement weather, the visibility of the actual subject matter being viewed in inclement weather is also noted. The main viewing area is to the south, and the views to the cathedral are from many places on the roof terrace obscured by the viewing beacon.

10.7 Given the harm to the city skyline and the harm to the city skyline that would result from the observation beacon tower it is recommended that this observation beacon be removed from the proposal with an alternative access to the roof terrace, ideally one that did not require an additional



structure on top of the roof terrace. However should a structure be required and justified it should be the minimum required and also sited to minimise the impact. It is assumed that both stairs and a lift are required in terms of fire safety. Given the complexity between the levels of the site and the height of existing rooms it is appreciated this will not be a simple solution. However, one solution could be to omit education space on the 5<sup>th</sup> floor, and extend the external café seating across into this section of the building on the southern elements, with the colonnade extending across education space 05-006, to create a separate education space if required that could have doors onto a roof terrace such as the lower terrace. Noting the size of the viewing beacon on the 5<sup>th</sup> floor and the roof terrace, it is not considered that the space lost by the omission of the education space and the lowering of the roof terrace to the floor below (with extended colonnade) would reduce the useable space by a great degree, however would be a less harmful scheme in terms of the city's skyline, being set back from the southern elevation.

10.8 As such amended plans are requested to aid in the mitigation of the harm identified to the city's skyline.