

Consultation Response from KC Conservation and Design
2019/92962 Field House, 15 , Wellington Road, Dewsbury, WF13 1BQ
Erection of additional storey and conversion of building to provide 23 self-contained apartments and A3 use in basement and part of ground floor (Listed Building within a Conservation Area)
Date Responded:
Responding Officer: NH
Responding Ref: DM 7/98

This application is for planning permission for the erection of an additional storey and the conversion of the building to provide 23 self-contained apartments with an A3 use in the basement and part of the ground floor. The building is listed grade 2 and within the Dewsbury Town Centre Conservation Area. The building is also in the area designated as a Heritage Action Zone (HAZ) for grant funding which is part funded by Historic England. These comments relate to the impact of the development on the significance of the conservation area and in turn design; comments on the impact upon the listed building are within the associated application for Listed Building Consent (2019/92963).

Field House has stood in varying states of occupancy over the years and has steadily become vacant cumulating in the loss of the last business mid-2018. The building is secure and kept in a good condition. The building is a key building within not only the conservation area but within the HAZ where the scheme will be funded to aid its conversion and help the regeneration of the Daisy Hill area of the town centre. The conservation area benefits from an appraisal, which may be revised and updated as part of the HAZ, and Field House is stated within the appraisal as being part of a “significant streetscape groups of building which make up the historic townscape”. Due to its location within the CA and the HAZ it is a key building to the regeneration of the area and its reuse will act as a catalyst for improvements to the immediate area, including Daisy Hill. The location of the building is particularly key in relation to the railway station, being the first building you see when leaving the station building. Therefore finding a long term viable use for the building is supported and on the basis of the information provided it would appear that these uses will achieve this. I offer no objection to the change of use and the conversion of the building, comments on how this is achieved are in the main contained in the application for Listed Building Consent but in terms of the alteration of the roof this is also referenced as follows in relation to the setting of the Dewsbury Town Centre Conservation Area.

The application suggests that the alteration to the roof will not harm the significance of the conservation area or the appearance of the listed building. The Heritage Impact Assessment goes as far to state: “As no harm to the listed building or conservation area has been identified, the proposal does not engage either paragraphs 195 or 196 of the NPPF.” I have to say I cannot agree to this statement. The alterations will provide for a change in roof style and insert a feature that does not appear within this part of the conservation area. This part of the conservation area, based upon the character of the other buildings along Wellington Street, is typified by a consistent approach to the design of the buildings in terms of overall design, proportion, consistent roof profiles and consistent eaves lines. This is stated in the conservation area appraisal. Therefore how possibly can there be no harm when these principles of significance are broken by this proposal?

There is harm and in my opinion this is undeniable but the main issue that follows is what level of harm this is when assessed against the requirements of the NPPF. Paragraph 193 states that great weight should be given to the assets conservation irrespective of whether potential harm amounts to substantial, total loss or less than significant harm. Paragraph 194 further suggests that any harm to the significance of the heritage asset should require clear and convincing justification. The application is supported by two thorough documents, the Design and Access Statement and a Heritage Statement and whilst I disagree with the conclusions of the latter document it does describe the significance of the building well. The D&A does provide details of the number of iterations the scheme has gone through to come to this design and this is welcomed as this goes towards mitigating the harm which is required before the heritage balance is applied. Paragraph 195 discusses substantial harm whereas

paragraph 196 looks at less than substantial harm. In the context of this application it is the harm to the significance of the conservation area as a whole that needs to be assessed which is stated in paragraph 201; it states that the harm should be referred back to paragraphs 195 and 196. I am of the opinion that the level of harm caused is that described in paragraph 196, less than substantial harm. Under this paragraph, such harm should be weighed against the public benefits of the proposal including securing the buildings optimum viable use (the heritage balance). The building is vacant and is in a prime location which adds to the argument that the building would act as a catalyst for the regeneration of the area. This is an answer to the conversion of the building only and not the necessity of an additional floor, in other words the conversion of an empty building should achieve this catalyst. The additional floor in my opinion is not proven in terms of securing the optimum viable use as I am not convinced from the information provided that the additional floor will add any more viability to provide a public benefit. The only way of proving that an additional floor is required to achieve this optima is by a Viability Assessment that would indicate the need for this amount of additional floorspace set against the costs of doing so, the input of any grant funding (the building is a target building of the HAZ) and the values it would bring. Without this it is not possible to balance the harm against achieving the optimum viable use. Whilst I am aware that through previous discussions there is a reticence to provide a viability assessment and judgements should be made against the regeneration benefits it brings, I am of the opinion that due to this lack of information paragraph 196 is not complied with due to the lack of proven public benefit. Equally Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is failed because the proposal fails to preserve or enhance the significance of the conservation area (if para 196 was complied with then Section 72 would be as well).

In conclusion whilst the conversion is welcomed the requirement of the extra floor is not proven, and will need to be, which allows the heritage balance to be applied and to justify the need for an additional floor though a viability appraisal. Further information is required.