

Keystone Heritage



Response to Conservation Officer Comments (dated 15-08-23)

Application No: 23/00862/FUL

Case Officer: Sharron Williams

Address: Flat Above 6 Church Green West, Redditch, B97 4DY

Proposal: Construction of new first and second floor rear extension, conversion of existing offices and existing apartment into 4 new apartments comprising 2 no 1 bedroom units and 2 no. 2 bedroom units.

Date: 25-08-23

This document constitutes a rebuttal of comments received from the conservation officer (CO) in response to the above application for redevelopment of no.6 Church Green West, Redditch.

1. Gap Site

The CO states that the Heritage Impact Assessment (HIA) submitted in support of the current application (23/00862/FUL) '*shows that there was previously a set-back structure behind the gap, with what appears to have been a formal garden in the gap.*'

The undeveloped plot that the CO refers to as a 'gap site' (and to which the CO clearly attributes some historic relevance) is off William Street, immediately to the north-west of the application site. This gap site is shown on the 1884 Ordnance Survey 1:500 town plan below (indicated here with a blue dot).

The formal garden and set-back building discussed in the HIA was actually not that referred to by the CO, but that located immediately south and west of no.5 Church Green West (indicated below by a green dot). This gap site (off Church Green West) no longer exists.

The gap site, 'formal garden' and set-back buildings referred to by the CO lies **outside** the current application site (red line below) and **will not be directly affected by the proposed scheme**. It will not be 'removed' as claimed by the CO (p.3 of comments).



Curiously, this area is marked by the CO on the 1921 AP as “gap” when it is actually not possible to tell from the historic photograph - due to deep shade - whether or not this area is a gap. In fact, the 1977 OS map shows this area as half developed:-



The nature of this area – which clearly changed over time – is almost entirely irrelevant to the current application as it lies outside the application boundary and will, in any case, not be developed as part of the proposed scheme.

What IS relevant is that land *within* the boundary of the current application appears, from historic map evidence, has been developed (to one extent or another) throughout its history and it will continue to be so.

2. Height of Properties

The CO persists in making reference to ‘a history of diminishing scale’ on William Street as though this were a designed or serendipitous feature of the street. This is simply not the case. The two properties either side of William Street fronting onto Church Green West (nos.6 and 7A) were originally – and still are – three storeys in height. Any extension of these buildings at a continued height of three storeys is not an unreasonable proposition.

A property was subsequently built adjacent to no.7a at two storeys. This was clearly a later addition and does not constitute a ‘history of diminishing scale’.



Later development adjacent to 7a Church Green West. Source: Google Earth.

Land adjacent to 6a, on the other hand, (as we have established) was piecemeal developed and redeveloped over many years, ending with the existing single storey extension that dates to the mid 20th century. This does not constitute a designed or intentional ‘history of diminishing scale’ either.



Later development to rear of no.6 Church Green West. Source: Google Earth.



1921 Aerial photograph of application site, terrace beyond and Methodist Chapel.

We have seen that the land beyond here has been partially developed and partially open space over the decades. Similarly, this does not constitute a history of diminishing scale.

And most notably, the presence along the adjacent part of William Street, of a tall terrace of houses (at least two, probably three storeys in height, indicated by the yellow arrow) followed by the imposing presence of the former Methodist Chapel (see AP below) clearly demonstrates that any concept of diminishing scale away from Church Green West is complete fallacy and would not stand up at appeal.

Clearly, this street was formerly far more built up than it is today, having suffered considerable clearance. The presence of i) almost continuous development and ii) much taller buildings than survive today must have given the William Street a much more canyonised and enclosed feel than it has today. *This* is the effect to which the HIA refers when it states that the reintroduction of some height here would be remedial - helping reintroduce a sense of enclosure that has been eroded. That point is perfectly correct, is relevant to the current application and would stand up at appeal.

3. Harmful Impact

The CO states that the current proposal would be harmful to the non-designated heritage asset (NDHA) of the application property, which has been assessed as being of low significance and as making a neutral contribution to the conservation area.

Under NPPF para 203, any impact on no.6a must be weighed against the public benefit of providing additional accommodation sustainably located within walking distance of the town-centre.

It has been claimed that there would be a harmful impact on the setting of the grade II listed St Stephen's Church and on the wider conservation area – but no indication or evidence has been provided about the nature or level of this harm.

Since the proposed extension would be hardly visible from the church and it effects no key areas of significance of the conservation area, this is strongly disputed and would be argued at appeal.

4. Options

The CO agrees that the rear part of the existing application building is unattractive and that a new structure here 'has the potential to improve on the existing'. It is suggested that this improvement could be achieved with a lesser degree of redevelopment. That may be true. However, that is not what is proposed.

There is no incentive – either social or economic – to alter the application building with a lesser quantum of redevelopment. The proposal is not viable and is unlikely to be undertaken – leaving the existing application in its ‘currently unsightly’ (CO comments p.3) state.

5. Summary

- The alleged harm to the NDHA of the application property is unproven and is disputed.
- The alleged harm to the grade II listed church is unproven and is disputed – no key views or character will be affected.
- The alleged harm to the Church Green Conservation Area is unproven and is disputed - no key views or character will be affected.
- Any deliberate or meaningful ‘history of diminishing scale’ on William Street is disputed and is contradicted by map and AP evidence.
- Any gap site is outside the boundary of the application site and will not be altered.
- Any the nature of any gap site as undeveloped has fluctuated over time.
- The presence (either historical, present day, permanent or temporary) is irrelevant in terms of building heights given the former presence tall buildings beyond.
- Alternative options that it is suggested could achieve the benefits of improving the ‘currently unsightly’ rear of the application property with less development are not financially viable and are therefore unlikely to be undertaken.