

# Nos 133 to 135 COMMERCIAL STREET NEWPORT

# **HERITAGE IMPACT STATEMENT**



September 2019

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Holland Heritage www.hollandheritage.co.uk



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### 1.0 Introduction

### 1.1 Authorship and Purpose

This Heritage Impact Statement report is written by Edward Holland, Director of Holland Heritage. It was commissioned by Chris Spiteri of the Property Index on 27<sup>th</sup> August 2019.

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This report is to inform the proposed redevelopment of the site. The report responds to pre-application advice from Newport City Council advising that a Heritage Impact Statement is required, to take account of the potential impact on the neighbouring conservation areas.

#### 1.2 Location

The site is on the west side of the street towards its south-eastern end. It is on the south-east corner of the junction with Hill Street, north-west of which Commercial Street is pedestrianised.





Ordnance Survey, (c) Crown Copyright 2019. All rights reserved. Licence number 100022432

Fig 1 Location Plan supplied by Morgan2Morgan Architects

### 1.3 Methodology

The purpose of this Heritage Impact Statement is to fully understand the historic asset and its vulnerabilities and to assess the current proposals. The assessment process follows the approach set out by Cadw in Conservation Principles<sup>1</sup> and in best-practice guidance documents including Heritage Impact Assessment in Wales (2017). These documents contain the general principles to consider when planning changes to historic assets.

This report is based upon a site survey on 11<sup>th</sup> September 2019 preceded by research in Gwent Archives at Ebbw Vale on 4<sup>th</sup> September 2019. On the day of the survey some upstairs rooms to the rear were locked and inaccessible and so this report is unable to fully assess heritage impact for those spaces.

### 1.4 Designations

Nos 133 to 135 Commercial Street are not listed. Neither are they in a designated conservation area but they are close to the boundaries of Town Centre Conservation Area (the opposite corner of the junction between Hill Street and Commercial Street) and St Woolos Conservation Area (across

<sup>&</sup>lt;sup>1</sup>Conservation Principles for the sustainable management of the historic environment in Wales (Cadw, Welsh Government, March 2011).



Hill Street approximately 75 metres to the west). The current boundaries are shown at Appendix A.

Nos 133 to 135 Commercial Street lies within Stow Hill Community which has 108 listed buildings, all of which are Grade II except for Newport Castle which is Grade II and St Woolos Cathedral which is Grade I. The nearest listed buildings to the site are:

Nos 142–143 Commercial St W side (approximately 125 metres to NW)
No 144 Commercial St W side (approximately 125 metres to NW)
No 46 Commercial St E side (approximately 100 metres to N)
No 42 Commercial St E side (approximately 150 metres to N)
St Pauls Church, Commercial St (approximately 275 metres to SE)
Nos 13 and 14 Hill St (approximately 150 metres to W)
Victoria Road United Reform Church (approximately 150 metres to W)

These are shown on the following plan annotated to mark the location of 133 to 135 Commercial Street.

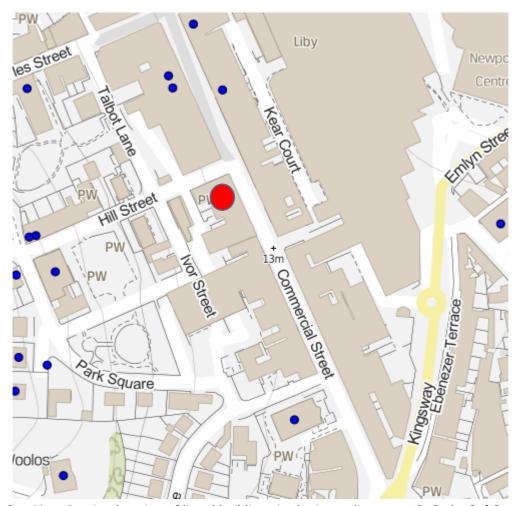


Fig 2 Map showing location of listed buildings in the immediate area © Cadw Cof Cymru



# 2.0 History of Nos 133 - 135 Commercial Street

2.1 The Tithe Map for St Woolos Parish, dated 1845, shows no buildings on this site. This is perhaps surprising given the hornless sash windows of the 2-storey rear range. The apportionment lists the land as Building Ground owned by Sir Charles Morgan of Tredegar and occupied by the Tredegar Wharf Company.



Fig 3 Extract from St Woolos Parish Tithe Map © National Library of Wales

- 2.2 The 1876 Butcher's Trade Directory shows that the site was in occupation by then as it lists the corner block (then No. 136) as the Tradesmen's Arms and Nos 133 to 135 as painters, watchmaker and carver/gilder respectively. By 1894 there was a surgeon at No. 135.
- 2.3 The 1<sup>st</sup> edition Ordnance Survey map dated 1883 (1:2,500 scale) shows the site built up and the corner block marked as a Public House. The rear range is shown as one contiguous, unlabelled, block not subdivided into a terrace of dwellings as its appearance might have suggested. However, the 1894 Jones's Street Directory refers to Nos 1 and 2 Hill Street.
- 2.4 The 2<sup>nd</sup> edition Ordnance Survey map dated 1902 now shows the public house as one large block extending as far as up Hill Street as the United Methodist Chapel on the corner of Ivor Street. The division of the



various properties fronting onto Commercial Street is much as it is today. By the time of the 1970 Ordnance Survey map the chapel has been demolished and it has since been replaced by a modern Salvation Army church. The western end of the block that ran up from the public house to abut the 19<sup>th</sup> century chapel has also been altered and shortened.



Fig 4 1902 2<sup>nd</sup> edition Ordnance Survey Map

- 2.5 We know that the Tradesmen's Arms was built to its current form by 1906 as it is shown in a postcard postmarked with that date.
- 2.6 It is later shown in a photograph of 1911 marking the coronation of George V.
- 2.7 The 1914 Johns' Street Directory for Newport lists No 133 as by then occupied by Fleming Reid and Co. Ltd., Scotch Wool Stores. This Scottish company, that was based in Greenock and was eventually acquired by the larger J and P Coats, had advertised in the South Wales Echo as early as 29<sup>th</sup> December 1888 for "Agents in the smaller towns of Wales" claiming that they had one in every town in England and Wales. A further advert in 1896 suggests there was still not a store in Newport. The 1914 Directory lists No 134 as being a tailor and No. 136 the Tradesmen's Arms under the landlord E H Dodd. He is shown in the 1911 photograph standing in the



doorway of the pub with his wife and son. In a later edition (1938) the public house is numbered 135 and it and Fleming Reid continue to be listed in the 1946 edition of the Directory.

2.8 The 3<sup>rd</sup> edition Ordnance Survey dated 1921 shows the site little changed. Both Fleming Reid and the Tradesmen's Arms are listed in the 1957 Kelly's Directory but neither are shown as trading in the 1968 Kelly's Directory.



Fig 5 Postcard postmarked 1906 © <u>www.newportpast.com</u> (from the private collection of Patrick White) – Tradesmens Arms seen to extreme left



Fig 6 Tradesmen's Arms shown in photograph of 1911 © http://beerbrewer.blogspot.com/2013/01/now-then-tradesmens-arms-newport.html



# 3.0 Architectural Description of Nos 133 – 135 Commercial Street

- 3.1 There are no records of who designed these buildings but whilst No 133 could be the routine work of a local builder, Nos 134 and 135 are a unified build of more architectural distinction and therefore likely to be the work of a known architect. Given that the land was owner by the Tredegar Estate it is possible that it was designed by the estate architects Habershon and Fawckner and perhaps specifically by J. F. Fawckner who ran the Newport office of this firm. They were active in Newport between 1857 and 1907 and are responsible for a number of buildings on Commercial Street including Nos 34-35 and No 165 as well as the Havelock Street Presbyterian Church.
- 3.2 Overall this group of buildings has 3-storey red brick frontages to Commercial Street, turning the corner into Hill Street and then stepping down to a 2-storey range set into the steep slope and with rendered elevations, all under slate roofs. There are red brick chimney stacks with dressed stone neck bands and cornices.
- 3.3 The primary interest, as indicated at 3.1 above is in the building on the corner that was formerly the Tradesmen's Arms. It is in the late 19<sup>th</sup> century fashionable Queen Anne Revival style which was popularised by the architect Norman Shaw. It is characterised by high quality brickwork ornamented with freestone banding and small-pane fenestration including distinctive thermal windows to the 2<sup>nd</sup> floor. The rounded corner also has an oeil de boeuf window.
- 3.4 The rounded corner bay and the flanking end bay to Commercial Street and end bay to Hill Street form a symmetrical frontage with pilasters framing each bay. These pilasters are heavily banded to the base. This style of elevation is extended in a simpler manner by 2-windows to Commercial Street and 1-window to Hill Street, the latter terminating in a similar pilaster.
- 3.5 The 1911 photograph shows that the rounded corner bay formerly had a cupola and it is not known when this was taken down. An aerial view c.1925 shows this feature and a modern aerial view shows the flat base for this remaining. The flanking bays are gabled with banded detail and large panelled freestone kneelers. The outer bays have a deep modillion cornice.





Fig 7 View from junction of Commercial Street and Hill Street

3.6 The windows are all horned timber sashes with 6-pane glazing to the upper sashes, except for the semi-circular arched thermal windows which are entirely small-pane. All windows have keystones set into brick voussoirs and those to the thermal windows are stepped forward. All windows have stone sills continuing into band courses. The  $1^{\rm st}$  floor keystones rise up to join the  $2^{\rm nd}$  floor sill band.



Fig 8 Hill Street elevation of former Tradesmen's Arms



- 3.7 Some original cast-iron, ornamented, rainwater hoppers are still in situ, two to Hill Street elevation and one to Commercial Street elevation. The Hill Street elevation also retains an historic street sign.
- 3.8 No 133 Commercial Street is in a wholly different style and is a pair with No 132 to its left, though that latter property is separately owned and outside the scope of this report. It is broadly contemporary with the main corner block though is less architecturally successful and its band course does not align with the neighbouring No 134. The elevation is distinctive for its large 1<sup>st</sup> floor splayed bay in a dressed stone surround that extends up to include the 2<sup>nd</sup> floor windows. The splayed bay has a broader central light flanked by narrow lights and all under a band of six square top lights. The parapet has a scrolled panel and the 2<sup>nd</sup> floor has a pair of similar lights either side of a blind arched recess with scalloped head. Instead of the modillion cornice of the main block this has a deep rendered and fluted frieze.



Fig 9 Commercial Street elevation Nos 132 to 134

3.9 The entire ground floor has been modernised with out of character shop fronts. A vestige of the glazed tile public house frontage can be seen exposed at the extreme left of that building (No 135).





Fig 10 Evidence of glazed tile pub frontage to former Tradesmen's Arms

3.10 On Hill Street the 5-window range that runs west from the rear of the former public house is 2-storey with smooth rendered elevations under a slate roof with terracotta ridge tiles. There do not appear to have been any ridge chimney stacks though there is one lateral stack to the rear and evidence for a further one. Unusually for this later 19th century date it has deeply recessed hornless sash 12-pane sash windows. Horns became typical around the middle of the century and so it is possible that these windows were reused from an earlier building. It is noted that in the 1885 Johns' Street Directory part of this building is shown as occupied by W Christopher, Builder so he may have had access to salvaged materials and have been responsible for its construction. Whilst the windows are regularly spaced the ground floor openings are not and reflect considerable alteration in modern times. It now has modern doors and windows and one blocked opening. The uphill gable end is blank and probably reflects that this range once continued further uphill and was cut in the later 20th century when the short access road was created between this and the Salvation Army building.





Fig 11 Hill Street elevation showing rear range

3.11 The cement rendered rear of this range is much altered and screened by a later brick wall with modern metal vehicular entrance and timber pedestrian gate. There is a narrow 2-storey lean-to at the uphill end, a single storey lean to in the middle and a broad arched opening to the east.



Fig 12 Rear elevations showing rear of Hill Street range to the left



3.12 The rear of the block fronting Commercial Street is of red brick but partially obscured by a huge red brick and slate roofed block added to the centre of the rear yard. Brickwork is mostly laid in an irregular bond. The central block has a curious asymmetrical roof profile and a single storey lean to the uphill end. To the south side of this block and to the rear of No 133 there are some modern windows and some altered segmental-headed window openings.



Fig 13 Rear elevations of central block in the yard and No.133 behind

3.13 Internally the buildings have been substantially altered. The ground floor has been comprehensively modernised to accommodate retail premises including nail and tattoo studios. There are many modern subdivisions and out of character suspended ceilings. Staircases have been altered though some may be in original locations and the stairs to No 133 retains timber balustrade. The 1<sup>st</sup> floor room to No 133 is the only one to retain its original character with ceiling the cornice and Victorian fireplace with bracketed mantel. There are two further 1<sup>st</sup> floor rooms that retain smaller fireplaces with decorative cast-iron surrounds. There are some 4-panel doors.





Fig 14 Interior of 2<sup>nd</sup> floor corner room over former Tradesmen's Arms



Fig 15 Interior view of 1<sup>st</sup> floor bay-window room to No 133 retaining cornice and fireplace



Fig 16 Surviving fireplace to 2nd floor of No 133







Fig 17 Example of a surviving 4-panel door

Fig 18 Rear staircase



Fig 19 altered ground floor to No 135, the former Tradesmen's Arms



# 4.0 Heritage Significance of Nos 133 – 135 Commercial Street and its Capacity for Change

- 4.1 No 135 is the dominant element of this group, both architecturally and historically. Architecturally, its design responds to its corner site and as such is a landmark building at the junction of Commercial Street and Hill Street. The corner entrance is typical of public houses of this period which were often sited in this way for maximum visibility on the street (e.g. Waterloo Hotel, Pillgwenlly and the Corporation Hotel near Somerton Park) Here there are almost-matching elevations to Commercial Street and Hill Street creating a degree of symmetry to the design and the brickwork with its banded detail is of architectural significance. Historically No 135 is of some heritage significance as the former Tradesmen's Arms.
- 4.2 No 134 has similar architectural significance to that of No 135 having clearly been built together. However, No 133 is of less architectural interest and is of a different, routine, design. Neither No 133 or 134 have particular historical significance.
- 4.3 The Hill Street range climbing the hill around the corner is of less interest that first impressions would suggest. The later 19<sup>th</sup> century date of construction evidenced by map research is unexpected given the use of hornless sash windows, raising the possibility that they may be reused from somewhere else. The ground floor and rear elevations of this range are much altered.
- 4.4 Overall Nos 133 to 135 have some townscape significance given the corner siting and the quality of the brickwork in a section of Commercial Street where there is little of architectural note. However, this has been diminished by the loss of the cupola seen in old photographs. Indeed, John Newman in the Buildings of Wales volume that covers Newport<sup>2</sup>, describes the architectural interest of Commercial Street and refers to No 137 but says "after this nothing more until Kingsway and George Street interrupt" (Wyatt's St Paul's church having already been referred to).

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<sup>&</sup>lt;sup>2</sup> J Newman, Gwent / Monmouthshire (The Buildings of Wales Series, Penguin, 2000), p.450





Fig 20 view south along Commercial Street with Nos 133-135 to the right

- 4.5 The interiors of Nos 133 to 135 have been considerably altered with out of character changes. The ground floor shops in particular retain nothing of the original building. Upstairs some original doors and fireplaces were noted but nothing of such significance is retained as to prevent adaptive reuse. Only one room was seen that retains its original ceiling and cornice intact (this is to No 133), the others having modern suspended ceilings.
- 4.6 Assessing significance in accordance with Cadw's Conservation  $Principles^3$  it is considered that overall Nos 133 135 Commercial Street has low heritage values notwithstanding the higher value of the design of the  $1^{st}$  and  $2^{nd}$  floors of No 135. Had the former Tradesmen's Arms been intact to ground floor and interior it would have had moderate to high heritage value.
- 4.6.1 Evidential value is derived from the design of the block to show that these were commercial buildings forming part of the primary commercial street in Newport. However, the degree to which the building has been

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<sup>&</sup>lt;sup>3</sup> Conservation Principles for the sustainable management of the historic environment in Wales (Cadw, Welsh Government, March 2011).



altered, especially to the ground floor and interiors, means that the assessment is that it has **low evidential value.** 

- 4.6.2 Historical value is derived from the evidence of the former Tradesmen's Arms and the evidence from Trade Directories of other occupants from the late 19<sup>th</sup> century to later 20<sup>th</sup> century. However, this type of occupancy is typical of a street of this kind and so accordingly it has **low historical value**.
- 4.6.3 Aesthetic value is severely diminished by the degree of alteration to the ground floor which has had original shop and bar frontages removed and replaced by out of character modern shopfronts. The Hill Street elevation has similarly had ground floor openings significantly altered. However, above ground floor level there is greater aesthetic value in the quality of the brickwork with its distinctive stone banding and small-pane fenestration as well as the corner oeil de boeuf window. Overall No 133 has low aesthetic value but Nos 134 and 135 have moderate aesthetic value.
- 4.6.4 Communal value is higher given its presence on a major commercial street in the city and therefore will be seen by many. The former Tradesmen's Arms will also have been used and remembered by many. Nevertheless, its more recent uses has resulted in **low communal value**.
- 4.7 Given the amount of change carried out to the buildings in the late  $20^{th}$  / early  $21^{st}$  century it can sustain further change without adverse impact on the remaining heritage value. Infact, further change has the capacity to enhance the character and appearance to the ground floor of No. 135.



# 5.0 Assessment of the Proposed Scheme and its Heritage Impact

- 5.1 The proposed scheme is for three retail units on the ground floor and a total of 22 (one and two bed) apartments on the upper floors. Most of the apartments are in the proposed modern new build at the uphill end while only nine are shown as in the existing buildings. Given the degree of alteration to the interior, including existing extensive sub-division, the further alterations to the plan-form that the proposed scheme will entail can be achieved without additional adverse impact on the heritage. The floor plans appear to show that surviving fireplaces are retained.
- 5.2 The retention of the existing unsympathetic shopfronts is unfortunate but, in itself, will not result in any additional heritage impact as that change has already taken place long ago.
- 5.3 The primary architectural interest of the block is the 1<sup>st</sup> and 2<sup>nd</sup> floors of Nos 134 and 135 including its return elevation to Hill Street. The proposed plans appear to show that these are to be faithfully preserved, assuming that the fenestration is either the existing retained or precisely like for like replacements. This would result in no adverse heritage impact.
- The greatest change is to Hill Street where some demolition and rebuild is proposed. Conversely the downhill 3-bays are enhanced through the introduction to the ground floor of in-keeping small-pane sash windows and a late-Georgian style door with overlight. It is recommended that new joinery should be painted timber to match the historic original. These replace the existing modern doors and windows and as such make a positive impact on the character and appearance of this elevation as it abuts the The uphill two bays are proposed to be demolished and replaced by a 4-storey and attic apartment block with a 3-window elevation to the street. This is understood to have a channel rendered finish to the base and a smooth render finish inspired by Victoria Place uphill to the west. A rendered finish is also compatible with the rendered finish of the existing Hill Street range. As the fenestration is of the same late-Georgian style as the existing it should also be of painted timber. The SE elevation shows that the two-storey red brick and slate roofed block to the centre of the rear yard is to be demolished and replaced by a taller modern block. The existing brickwork is of varying bond and is already considerably externally altered. The rooms within this block were not accessible but it is judged that they are unlikely to retain anything of particular significance.



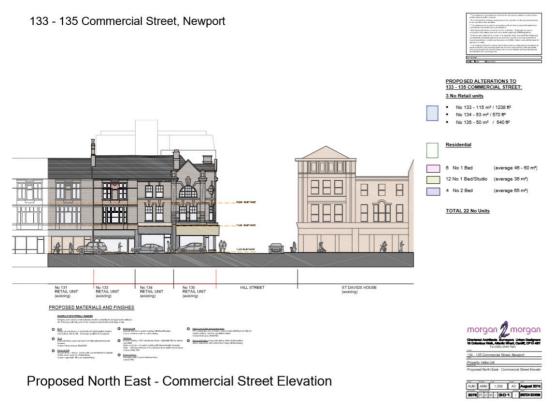


Fig 21 Draft Proposed elevation to Commercial Street © Morgan2Morgan Architects



Fig 22 Draft Proposed elevation to Hill Street © Morgan2Morgan Architects





Fig 23 Draft Proposed SW elevation to Hill Street © Morgan2Morgan Architects

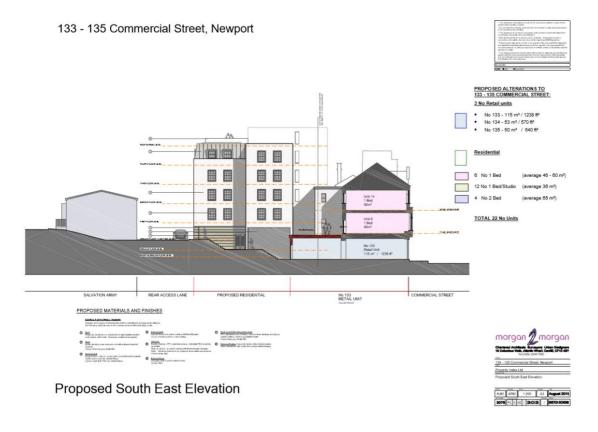


Fig 24 Draft Proposed SE rear elevation © Morgan2Morgan Architects



5.5 As referred to at paragraph 1.4 whilst the site is not within a conservation area it is immediately adjacent to the boundary of Town Centre Conservation Area and close to the boundary of St Woolos Conservation Area (see Appendix A). Consideration must therefore be given in this Heritage Impact Assessment as to whether there is any impact on these designated areas. There is no substantive change to the relationship with either Conservation Area. Whilst the proposed 4-storey and attic block is taller than the 4-storey yellow brick block on the opposite, north side, of the street (thought to be designed by A O Watkins) it will not have any adverse heritage impact on it or of the Town Centre Conservation Area for which it forms the south-eastern edge. Also, given the steep gradient of Hill Street the height of the proposed block will not appear significant at the boundary of St Woolos Conservation Area higher up the street.



Fig 25 Hill St elevation of No 137 Commercial St opposite the proposed development site

5.6 This document also provides a basic Level 1 Record for those parts of the building proposed to be demolished, in accordance with the standards set out by Historic England<sup>4</sup> and adopted by Cadw.

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<sup>&</sup>lt;sup>4</sup> Historic England, Understanding Historic Buildings – a guide to good recording practice, (2016)



### 6.0 Relevant Planning Policy and Guidance

### 6.1 **Pre-application advice**

Newport City Council has advised that in principle it welcomes proposals to find a new use for these largely vacant buildings. Its concern about the demolition of some of the Hill Street range stems from a view that it is "amongst the earliest buildings in the area". This is understandable given the appearance of the 1st floor windows. However, this Heritage Impact Assessment has shown that whilst this range does indeed appear to be older on account of its hornless sash windows the evidence of historic maps is that it was built in the 2nd half of the 19th century. 1840 is regarded in the listing criteria as a threshold for assessing heritage significance. Buildings built after 1840 are considered to be of less interest unless they exhibit architectural or historical qualities of their own period. The fenestration of the Hill Street is archaic for its date and only survives to the 1st floor. Internally there is no remaining historic detail. Furthermore, we know from the 1845 Tithe Map that there were no buildings on the site at that date.

### 6.2 Local Planning Policy

The relevant document is the Newport City Council's Local Development Plan 2011 – 2026, adopted in January 2015. This sets out objectives and policies relating to the conservation of the built environment.

Objective 5 - Conservation of the Built Environment is:

"To ensure that all development or use of land does not adversely affect, and seeks to preserve or enhance, the quality of the historic and built environment."

The Plan acknowledges that:

"the quality of the built environment is a contributor to the quality of life" and that "Newport has a variety of interesting buildings and structures, including within the City Centre where many fine Victorian buildings remain".

Paragraph 2.34 of Policy SP9 re Conservation states that:

"The protection, retention, safeguarding, conservation and enhancement of heritage assets will be sought, and where new development is proposed that affects the building or site or its setting, this should be of the highest quality"



### 6.3 **National Planning Guidance**

6.3.1 National Policy on the historic environment is set out in Planning Policy Wales (Edition 10, December 2018 - Chapter 6, Distinctive and Natural Places). This recognises that the historic environment is a finite resource and can only be maintained for future generations if the individual historic assets are protected and conserved.

Section 6.1.5 states that Cadw's published Conservation Principles highlights the need to base decisions on an understanding of the impact a proposal may have on the significance of an historic asset.

Section 6.1.6 sets out the Welsh Government's specific objectives for the historic environment as being to:

- protect the Outstanding Universal Value of the World Heritage Sites;
- conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy;
- safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved;
- preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous;
- preserve the special interest of sites on the register of historic parks and gardens; and
- protect areas on the register of historic landscapes in Wales.

6.3.2 Technical Advice Note 24 published in May 2017 sets out general guidance on the management of the historic environment, heritage impact and setting of historic assets.

### Paragraph 1.15 states that:

"Heritage impact assessment is a structured process that enables the significance of a designated asset to be taken in to account when considering proposals for change. Heritage impact assessments should be proportionate both to the significance of the historic asset and to the degree of change proposed, and should include sufficient information to enable both the significance of the asset and the impact of change to be understood. The results of the heritage impact assessment should be summarised in a heritage impact statement which must form part of any listed building consent, conservation area consent and, when requested, scheduled monument consent applications."



#### 6.4 Cadw's Published Guidance

In May 2017 Cadw published a range of relevant guidance documents including one on Heritage Impact Assessment in Wales. These explain how vital it is to understand the implications of any proposed change before development is consented. It describes heritage impact assessment as a "structured process" to be summarised in the Heritage Impact Statement.

The publication on Heritage Impact Assessment in Wales sets out why the process of Heritage Impact Assessment can help make positive changes to historic assets. The guidance underlines that "Understanding the significance of your historic asset is the key to effective heritage impact assessment" and that "heritage impact assessment helps you to make changes to your historic asset that are in line with the principles of good design". Whilst Heritage Impact Statements are only mandatory when applying for listed building consent and for demolition of buildings within conservation areas Cadw recognises that there are occasions when undesignated heritage significance is identified. In such cases it is appropriate that the local planning authority ask for Heritage Impact Statements to assess the heritage values and issues in order to inform determination of a planning application. This is the case with Nos 133-135 Commercial Street, Newport.

In accordance with the government policy and guidance summarised above, this report has set out the required understanding of the historic character and significance of Nos 133-135 Commercial Street. It has concluded that there is nothing in the published policy and guidance that should prevent the proposed works, subject to their careful execution.

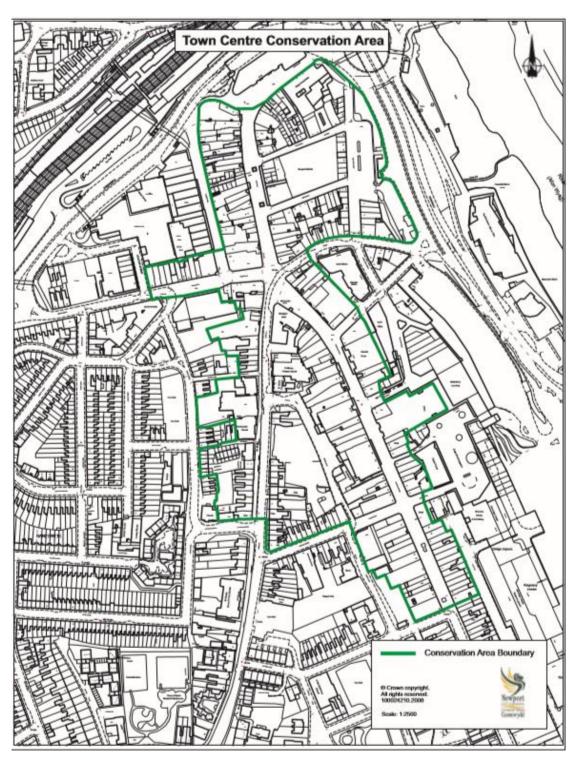
# 7.0 Summary

The Heritage Impact Assessment has assessed the significance of Nos 133-135 Commercial Street including its return elevation fronting Hill Street and has set this out in a proportionate Heritage Impact Statement.

The building is not listed and not in a conservation area. Whilst it is close to two conservation areas the proposed development would not have any adverse impact on those. The core significance of the building, namely the  $1^{\rm st}$  and  $2^{\rm nd}$  floor elevations of No 134 and 135, is retained in the proposed scheme and whilst the internal changes are extensive it is recognised that the interiors have already been substantially altered. It concludes that the proposed development provides sufficient protection for the heritage.



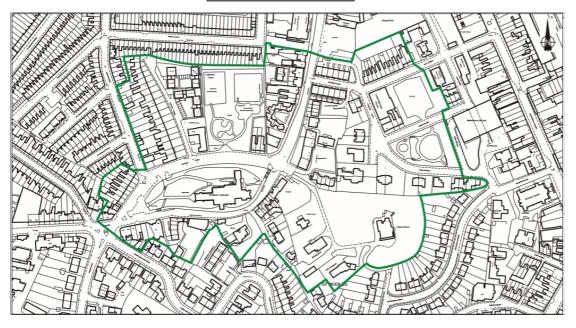
# **APPENDIX A**



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### St Woolos Conservation Area



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