



Historic England

Mr Rob Sims  
Southampton City Council  
Lower Ground Floor  
Civic Centre  
Southampton  
Hants  
SO14 7LY

Direct Dial: 020 7973 3739

Our ref: P01329671

12 January 2021

Dear Mr Sims

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BARGATE SHOPPING CENTRE AND ADJOINING LAND IN QUEENSWAY, EAST  
STREET, HANOVER BUILDINGS AND HIGH STREET , SOUTHAMPTON , SO14  
1HF  
Application No. 20/01629/FUL**

Thank you for your letter of 3 December 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Historic England has concerns, on heritage grounds, over elements of the application which should be addressed by seeking further information, amendments and safeguards. The assets that would be the most affected by the development would be the scheduled Bargate and easterly running Town Wall. These remarkable monuments to Southampton's medieval past would incur a high level of harm to their significance by development affecting their immediate setting. This harm, however, could be offset by a number of heritage benefits as broadly outlined within the application (including new public realm works and interpretation). There are a number of unresolved details relating to the design of the buildings and elements of the landscaping and public realm works that require attention, including the viability of the scheme. We would be happy to continue working with the applicant to resolve these issues and ensure the success of the scheme to the benefit of these nationally important heritage assets.

**Historic England Advice**

Significance of the Heritage Assets



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





### *Southampton Old Town*

The development site lies within the north-east quarter of the medieval walled town of Southampton. Most of the medieval town is designated as Conservation Area (divided into Old Town North, Old Town West and Old Town South). The town of Southampton developed in this location from the Norman period. The town walls were extended and the fortifications enhanced throughout the 13th and 14th centuries and by 1381 the whole town was enclosed by walls. The Medieval street pattern is still evident within the town with the High Street being the principal route from north (The Bargate) to south (the Water Gate). A grid of narrow streets extended from the High Street to the walls. The Norman Castle occupied the north-west quarter of the town and to the south-west were the quays, wharfs and warehouses associated with the port activity of the waterfront. Significant Medieval remains survive within these areas as above and below ground archaeology. The extensive stretch of town walls is the outstanding feature of the old town conservation areas.

The scale of development within the old town, generally 2-4 storeys, remained consistent throughout the 18th and 19th centuries as the town continued to develop and evolve (including a brief period as a spa town at the end of the 18th century). Buildings survive from the post-medieval period and therefore the historic character of the Conservation Areas is varied. Unfortunately the town was heavily bombed during the Second World War and this led to hasty redevelopment in the post-war period which was of varying architectural quality. As a consequence some areas of the old walled town were considered to be of insufficient historic and architectural interest to merit inclusion within a Conservation Area. Nevertheless, as much of the area is designated as Conservation Area and other sections of wall are designated as Scheduled Monuments, it is appropriate to consider the walled town as a whole as a heritage asset, albeit not all of it designated.

Two noteworthy buildings close to the development site and within the Conservation Area include the former Burton building and No. 6 High Street. The Burton building is locally listed and makes a positive contribution to the variety of architectural style and building date in the street scene and which is integral to the character of the conservation area. It comprises a simple art deco style frontage. In the same row as the Burton building (but outside of the site) is a Grade II listed building (No. 6 High Street). This is a mid-19th century three-storey, three bay building with a stuccoed facade and sash windows

### *Bargate and section of Town Wall running east from Bargate and including the Polymond Tower*

The Bargate dates from c.1180, with alterations and restorations of c.1290, 18th and 19th centuries. It was built as a town gateway with Guildhall at first floor level. The Bargate originally formed a continuous element of the Town Walls, but was separated



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk



by breaches cut in the 1930's to allow traffic movement. The Bargate is deemed to be one of the finest town gateways in England and this is recognized in its Grade I and scheduled status.

Collectively with the Town Walls it tells the story of the construction, evolution, and status of the medieval old town, and it has great communal and aesthetic value as an iconic symbol of Southampton. The evidential value of the Town Walls and Bargate are also high, as their fabric holds information regarding construction techniques and materials of medieval and later phases of alteration. The north eastern element of the Town Wall to the east of Bargate is a significant section of wall due to the presence of three tower turrets, with Polymond Tower marking the corner point where the walls turned southwards. Consequently the wall here has great historical value in demonstrating the extent and scale of the medieval town.

### *Central Parks Registered Park and Garden*

To the north-east of the development site lie the Southampton central parks, which are registered Grade II\*. These parks (the linked chain of West Park, East Park, Palmerston Park, Houndwell and Hoglands) have a rich time depth having been formed out of the former medieval open fields (Lammas Lands). However, their principal significance lies in the fact that they are an early example of municipal parks and were laid out in the late 1850's and early 1860's to provide important public green space in the heart of the developing city.

### Impact of the development proposals

#### *The Setting of Bargate and the Town Wall*

As has been acknowledged in relation to previous development proposals for the site, the construction of tall buildings in close proximity to these nationally important heritage assets has the potential to cause harm through development within their setting. It has always been our view that this is harmful to the significance of the Town Walls and the Bargate, as it disrupts the aesthetic appreciation and historical understanding of them. They were designed to be impressive and dominant structures within their wider surroundings.

The Environmental Statement accompanying the application notes that the present open nature of the site is not 'historically authentic', as this part of the town would have seen development in previous centuries (ES, Vol. 1, 10.38). It also notes that the recently demolished Bargate Shopping Centre was far more detracting in form and appearance and butted up against the walls in a significantly detrimental way (ES, Vol. 1, 10.60). Although we do not contest this it is important to note, given the wall has been present for over 800 years, the shopping centre and even its immediate



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





precursors do not account for a historic precedent for levels of development. Prior to this and for many hundreds of years the development would have been significantly smaller in scale.

It is for these reasons that we do not agree with the conclusions of the EIA and enclosed Heritage Statement that the effect on the Town Wall and Bargate is low level, we stand by our previous conclusions that development of this scale here causes a high level of harm that is less than substantial through impingement on the setting of the Scheduled Monuments. As a consequence of this the design and realisation of public realm around the wall becomes a vitally important element of the scheme, to ensure the heritage benefits that offset the harm are meaningful (see below for specific comments on the landscape and public realm proposals).

### *Proposed Building Design and Layout*

We commented in our pre-application discussion on the new 'castellated' design, whereby the buildings rise and fall in levels, and it was made clear that increased daylight to the site and within the residential properties was the key objective here. We have previously pushed to ensure the impact of the development on the town walls and Bargate was minimised by having the buildings set back away from it. This had been achieved in the consented scheme with a stepped back arrangement for the buildings that front it from the south. This step back reduced a canyon or cliff edge effect between the wall and the building line. The building line in the new scheme no longer retains the step back and also comes closer to the alignment of the wall towards the west (Block B1), creating a pinch point that closes in on the site of the wall when viewed from Bargate. It is also noted that the building height has increased for Blocks D, F & G from a maximum of 10 storeys to a maximum of 11 storeys, since pre-application discussion began in the summer of 2020.

Although we accept the permeability of the 'castellated' appearance brings some benefit, despite the reduction of a stepped back design, we have not been provided with an explanation of why Block B1 will now come closer to the line of the wall, and indeed the Bargate, at the western end. By moving the building closer the Bargate it increases the imposing effect of the development upon it. We would rather the western most corner of the building could be angled south further so that it could be on the same alignment as the consented scheme. This will ensure wider views of the wall and Polymond Tower from the Bargate (and vice versa), and lessen the impact upon its setting somewhat. We also believe that the design of the elevations should err away from the side of 'playful' as indicated in the Design and Access Statement, so as to ensure it does not become distracting and compete further with the dominance of the wall. A more uniform appearance would be preferable.

One element of the new proposals that differs from the previous is that the break in the buildings has moved to the east and now follows what would have been the trajectory





of the Town Wall as it turned south from the Polymond Tower. This is an improvement on the consented scheme as it respects the historic layout of the town, maintaining the primacy of the, albeit now absent, defensive wall. The proposed pocket park will provide positive opportunities to interpret the route of the wall. The reconfiguration of the buildings in this way now removes the route that led from the York Gate, south through the previously consented development. Although this is an unfortunate loss of what is still a historic route, we feel it is offset by the new pocket park proposals and the ability to demonstrate the trajectory of the city walls more effectively.

### *Landscaping and Public Realm*

The public realm elements of the proposals have developed positively following some pre-application discussions, with a good proportion of the space afforded wider public access. This will enable visitors to step back and view the monument from different perspectives and encourage the public to dwell and enjoy the space. The area around the York Gate has been designed to give it due prominence.

The ideas for interpretation and representation of the wall are encouraging, and we are particularly supportive of the change in finish of paving to Purbeck honed setts, representing the line of the wall and extent of the towers. We are somewhat more wary over the use of glass as it can be reflective, distracting and, unless incredibly well maintained, soon become grubby and prone to vandalism. To that end it would be sensible to consider alternative materials to provide this element of interpretation. We would also suggest the glass balustrade is replaced with a different, more sympathetic material, such as timber. We are interested in the interpretative proposals for the line of the wall where it turns south from the Polymond Tower and are supportive of the goal for achieving an attractive garden walk feeling combined with opportunities for public art. The suggestions for feature lighting to highlight the wall and its trajectory are also positive.

Some concern remains over the proposals east of the York Gate, towards the Polymond Tower. The main issue relates to the reduction of levels around the tower to create a set of steps. Visually this would be somewhat incongruous to the nature of the tower in its medieval setting, where it would seek to be more prominent from outside the city walls than inside them. It also raises concerns over the impact of nationally important archaeological deposits related to the monument and on the foundations of the extant historic structures, which are known from previous archaeological investigations to be shallow. We do not feel this impact has been fully understood or assessed within the Heritage Statement. Even if this design were to be considered acceptable, conservation led consolidation of any exposed foundation masonry would likely be necessary. It would be vitally important that the structural integrity of the tower and its foundations be understood prior to confirming or agreeing to the reduction of levels around it. Such investigation would require Scheduled Monument Consent (SMC). On the whole though, we would strongly encourage that this element of the







scheme is revised.

In heritage terms, the aims of the proposals will need to seek to protect the foundations of the monument and avoiding a reduction in levels that could impact the Saxon, medieval and post-medieval deposits, expose or put the shallow foundations of the tower at risk and cause harm to the setting of the tower. It will be equally important that any ground raising or landscaping features such as the grass beds do not detract from or diminish the dominance of the wall.

Some additional comments:

- We note that the retaining walls will be clad in stone and approve of this use of high quality material. It will need to be visually different but also compliment the stone that forms the historic wall to demonstrate it is clearly a modern addition.
- The positioning of tree's and other plantings close to historic fabric will need to be carefully considered, as it is an archaeologically sensitive area. Thought will also need to be given their location in relation to the wall, so as to not cause a detrimental effect, root damage, sapling growth, leaves and detritus, etc.
- Scheduled Monument Consent will be required for landscaping around the scheduled elements and also for conservation repairs for the wall.
- We would wish to see a management plan included in the proposals to ensure that the monument is maintained and looked after, something that should be established in conjunction with Southampton City Council.

### *Conservation Area and Registered Park and Garden*

We are still of the view that the development would be evident in some views across the conservation areas of the old walled town. It would appear as a relatively minor but additional intrusion of modern development in the historic streetscape. Clearly the taller parts of the proposed development are those which are evident further afield. However, the built-up nature of the town, the general lack of long views within the walls and the already greatly altered townscape means that there would only be a minor adverse impact on the general character and appearance of the conservation areas.

The setting of the Grade II\* parks is urban and there are no key views of historic significance out of or into the park which would be affected by development on this site. Although the taller sections of the development would be visible from the park, and certainly the new development on the north end of the Queen's Way would be visible along Palmerston Road, this is not considered to be out of context and would not have an adverse impact on the significance of the registered park.

### *Construction activities, monitoring and protection*



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk



It is noted in the application that although a Scoping Opinion had been requested, Southampton City Council has yet to provide a response. In our own consultation response to this we noted, with some concern, that piling and direct damage to the Town Wall Scheduled Monument during construction was to be scoped out of the EIA, along with effects on other Heritage Assets.

Construction (including piling activities) could have a direct impact on Scheduled Monuments, for example from vibration, construction activities in close proximity, and landscaping works around heritage assets. Such activities may also have an effect on other cultural/heritage assets, such as the locally listed Burton building where concerns related to the stability of the façade remain. The full range of cultural/heritage assets and potential impacts from construction and operation must therefore be assessed in more detail and appropriate mitigation measures further explored.

An extant SMC is already in place for protection and monitoring of the wall, which was for undertaken prior to the demolition of the Bargate Shopping Centre (SMC Ref: S00176812 - issued 8th November 2017). The SMC has conditions attached to it. We will require details on how the monitoring system is to be maintained and managed throughout the construction process and that this, along with the dismantling of the *in situ* protection to be undertaken in accordance with the previously agreed methodologies. A condition survey of the wall with recommendations for any further conservation and consolidation works will be required once the protection has been removed.

### *Viability*

The Viability Assessment provided with the application notes a self-evident challenge in keeping the scheme viable. It is therefore vital that the heritage benefits of the scheme - including landscaping and public realm proposals, interpretation, archaeological and conservation works - are subject to an advanced stage of detail and agreement prior to determination. Final details can be secured by condition or S106 agreement. We would suggest that the council appoints an independent specialist to undertake a review of the viability of the proposed scheme and we be given access to the results of the review.

In sum, the outstanding details and issues as outlined above need to be addressed in order to be certain that the harm caused to the designated heritage assets has been successfully offset in fulfilment of the requirements of DCMS policy regarding Scheduled Monuments and the National Planning Policy Framework (NPPF).

### Policy Considerations



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk



### *Statutory Protections*

The proposals affect a number of designated heritage assets and asset types including Scheduled Monuments, Listed Buildings, Conservation Areas and Listed Parks and Gardens.

The Bargate and the Town Walls are protected as a Scheduled Monument under the 1979 Ancient Monuments and Archaeological Areas Act on account of their national importance and archaeological and historical interest. As such any works within or interacting with the monument boundary will be subject to the requirement of Scheduled Monument Consent (SMC) which is granted by the Secretary of State for Digital, Culture, Media and Sport, in a process administered by Historic England. These structures are also Grade I listed.

With regard to the conservation areas there is a statutory requirement to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Areas (s.72, 1990 Act) and this must be taken into account by your authority when making its decision.

### *Government Policy*

The Department for Digital, Culture, Media and Sport (DCMS) document 'Scheduled Monuments and nationally important but non-scheduled monuments (October 2013)' sets out Government policy on the identification, protection, conservation and investigation of nationally important sites and buildings for the benefit of current and future generations. It notes that in addition to their intrinsic value, scheduled monuments can contribute to our perceptions of cultural identity and provide unique opportunities for research, education, leisure and tourism, delivering social benefits and contributing to economic growth.

Paragraph 20 states that, in cases including works proposed for development-, conservation- or presentation-related purposes, the Secretary of State has particular regard to the following principles which align with those contained in the National Policy Framework:

- Only in wholly exceptional cases will consent be granted for works that could result in substantial harm to, or loss of, the significance of a Scheduled Monument; and
- In cases that would lead to less than substantial harm to the significance of a Scheduled Monument the harm will be weighed against the public benefits of the proposal.

### *National Planning Policy Framework*



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





One of the principal objectives of the National Planning Policy Framework (NPPF) is the conservation of historic environment (paragraph 20). The following additional paragraphs are of relevance to this this application.

- Paragraph 184 notes that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations;
- Paragraph 189 requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance;
- Paragraph 190 states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal;
- Paragraph 192 describes that in determining applications, local authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution their conservation can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness;
- Paragraph 193 is clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be (it should be noted that a scheduled monument is one of the highest level of designation). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance;
- Paragraph 194 requires 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 (notably scheduled monuments, and grade I and II\* listed buildings) should be wholly exceptional;
- Paragraph 194 (footnote 63) states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments, should be considered subject to the policies for designated heritage assets;
- Paragraph 200 of the NPPF says that opportunities for new development should be sought within Conservation Areas and within the setting of heritage assets, to enhance or better reveal their significance.



## *Local Policy*

Both the Southampton City Centre Urban Design Strategy and the Southampton Old Town Development Strategy make references to the height of buildings in relation to the medieval townscape and character of the old town. They contain specific requirements for maximum heights for buildings in close proximity to the Town Walls, namely 3-5 storeys.

## Historic England's Position

We have undertaken some pre-application discussion with the applicants to encourage them to minimise harm to designated heritage assets from the development proposals. At the end of the last round of discussions, some questions of detail remained which are not addressed or resolved within the documents provided with the planning application. We have carefully considered the information submitted for the planning application and conclude that the development is harmful to designated heritage assets, but acknowledge that it also provides an opportunity to deliver heritage benefits, particularly in relation to the scheduled Town Wall and the Bargate. It is, however, important that the detail of these heritage benefit are agreed to ensure that the harm is offset in a manner appropriate and acceptable to the requirements of national policy and statutory law.

We consider that, on balance, the greatly changed urban context of the old town means that the level of harm to the Conservation Areas arising from the height of the development is acceptable. The development would however contribute to the current general heightening of development in and around the old town which results in either the loss of the scale and character of historic development within the old town (but outside of the conservation area) or a marked differential between the scale of development within the conservation area and that outside.

The harm to the designated heritage assets of the Town Walls and Bargate would be greater and, although we do not deem the proposals to cause substantial harm, we would judge the level of harm to be high. This is because we believe that the construction of tall buildings in this area would disrupt the aesthetic appreciation and historical understanding of the Town Walls and Bargate, which were designed to be impressive and dominant structures within their wider surroundings. The harm to designated heritage assets arising from the height of this development must therefore be clearly and convincingly justified and/or mitigated to satisfy the expectations of the NPPF. Both the heritage and other public benefits from the development must have to be shown to clearly outweigh the harm.

The specific areas that need addressing are;

- justification for the modification to Block B1 that moves it closer to the Bargate



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





and the alignment of the Town Wall or, failing a satisfactory explanation, an amendment to the design which restores it to the position of the previously consented scheme;

- amendments or conditions relating to the agreement of materials for the interpretation and landscaping elements related to the town wall;
- a re-assessment of the impact (and/or design) of the landscaping proposals between York Gate and the Polymond Tower, with greater consideration of the known archaeological data concerning the shallow foundations of the standing structures, the impact on sensitive and potentially nationally important archaeological remains, and the impact on the authenticity of the setting of the tower and dominance of the walls;
- details concerning the continuation and completion of monitoring and protection measures related to the Town Wall and a commitment to a condition survey and an undertaking to address any conservation repairs or consolidation works required once protection has been removed;
- the viability of the scheme and, in particular, its ability to undertake the enhancement, landscaping and interpretation elements which will offset the harm caused to the significance of the monuments by the construction of tall buildings within their setting, needs to be resolved. It would be unacceptable for the buildings to be constructed and the heritage benefits not be undertaken. We would suggest that the council appoints an independent specialist to undertake a review of the viability of the proposed scheme and we be given access to the results of the review. We would also offer our assistance in assessing the viability of the scheme, if required.

## Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 184, 189, 190, 192, 193, 194 (inc. fn. 63) and 200 of the NPPF.

In determining this application you should bear in mind the statutory duty of:

- Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess;
- Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas; and
- Section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





Historic England

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

**Iain Bright**

Inspector of Ancient Monuments

E-mail: [iain.bright@HistoricEngland.org.uk](mailto:iain.bright@HistoricEngland.org.uk)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



Historic England

Mr Rob Sims  
Southampton City Council  
Lower Ground Floor  
Civic Centre  
Southampton  
Hants  
SO14 7LY

Direct Dial: 020 7973 3739

Our ref: P01329671

18 February 2021

Dear Mr Sims

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BARGATE SHOPPING CENTRE AND ADJOINING LAND IN QUEENSWAY, EAST  
STREET, HANOVER BUILDINGS AND HIGH STREET , SOUTHAMPTON , SO14  
1HF**

**Application No. 20/01629/FUL**

Thank you for your letter of 4 February 2021 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

The significance of the designated heritage assets, the impact of the proposals and relevant policy considerations have been outlined in our letter dated 12<sup>th</sup> January 2021 and shall not be replicated here. This letter specifically addresses the applicant's response to our previous comments and the additional information that they have supplied to support their application. This letter should be read in conjunction with our former advice.

*Public Realm design proposals around the Polymond Tower*

In response to our concerns over public realm designs around the Polymond Tower, the applicant has submitted a series of alternative options. It is still our belief that the originally consented scheme presented the most appropriate response with regard to the setting of the scheduled monument and the impact on undesignated archaeological remains. Of the alternative proposals, option 1 is problematic on account of the removal of the turfed banks adjacent to the wall between the York Gate and the Polymond Tower. The presence of medieval render in this location lends the turfed banks the benefit of providing protection to this highly significant survival. In order to be able to assess the impact of removing the banks from the scheme in this



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk



location on the protection of the render, a full and detailed survey and analysis would need to be undertaken by an experienced conservator who could make recommendations for the needs and requirements necessary for its preservation and protection. There are Scheduled Monument Consent (SMC) implications with regard to these proposals.

Alternatively, an option that retains the turfed banks in these locations could be considered acceptable. It is recognised that options 2 and 3 are an improvement on the setting of the tower, but nevertheless introduce undesirable pinch points and additional barriers respectively. We would therefore suggest that a new proposal is developed that retains the more positive elements of both these options. For instance, the layout of option 2 could be adjusted so that the central planting bed is not so substantial. It could be narrower and follow the line of the proposed balustrade within option 3. A suitable species of planting could be incorporated that provides a low barrier in place of the glass balustrade. We would wish to see the arrangement of the grass beds adjacent to the wall and tower retain their option 2 configuration so as to not encroach upon medieval architectural features.

In conclusion we do not feel the issue of the public realm design around the Polymond Tower has been resolved to our satisfaction and there are potentially harmful implications for the setting and/or preservation of significant historic fabric that form part of the scheduled wall and tower.

### *Surveys and Conservation works*

It should be noted that regardless of which design is eventually agreed, a full up-to-date survey of the entire monument, including analysis of the aforementioned render and proposals for its conservation and protection, will still need to be undertaken prior to the commencement of works. This would feed into a specification for works for any conservation repairs and consolidation that may be required.

This will be included in the conditions of any SMC granted for the scheme. We would therefore suggest that surveys and conservation works to the monument before and after construction of the development are explicitly referenced in a condition attached to any planning permission granted or a S106 agreement (along with details of future management and maintenance).

### *Proposed materials for landscaping and interpretation*

Our comments on the proposed materials for landscaping elements from our previous letter still stand and are reproduced below for convenience.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk







The ideas for interpretation and representation of the wall are encouraging, and we are particularly supportive of the change in finish of paving to Purbeck honed setts, representing the line of the wall and extent of the towers. We are somewhat more wary over the use of glass as it can be reflective, distracting and, unless incredibly well maintained, soon become grubby and prone to vandalism. To that end it would be sensible to consider alternative materials to provide this element of interpretation. We would also suggest the glass balustrade is replaced with a different, more sympathetic material, such as timber. We are interested in the interpretative proposals for the line of the wall where it turns south from the Polymond Tower and are supportive of the goal for achieving an attractive garden walk feeling combined with opportunities for public art. The suggestions for feature lighting to highlight the wall and its trajectory are also positive.

We would suggest that a condition concerning the final design and materials used for landscaping and interpretive elements be attached to any planning permission granted.

### *Construction activities*

Our comments on construction (including piling activities) have not yet been fully addressed. They are reproduced below for your convenience.

Construction (including piling activities) could have a direct impact on Scheduled Monuments, for example from vibration, construction activities in close proximity, and landscaping works around heritage assets. Such activities may also have an effect on other cultural/heritage assets, such as the locally listed Burton building where concerns related to the stability of the façade remain. The full range of cultural/heritage assets and potential impacts from construction and operation must therefore be assessed in more detail and appropriate mitigation measures further explored.

We would suggest that a condition concerning these issues are attached to any planning permission granted.

### *Viability*

It is noted that Southampton City Council have sought an independent review of the viability assessment provided by the applicant. We would request that the report of this review is made available to ensure the heritage benefits of the scheme can be achieved.

## **Recommendation**



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF.

In determining this application you should bear in mind the statutory duty of:

- section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.
- section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

**Iain Bright**

Inspector of Ancient Monuments

E-mail: [iain.bright@HistoricEngland.org.uk](mailto:iain.bright@HistoricEngland.org.uk)

