

### Annex 1: Qualitative Account of Comments of the Berkhamsted Conservation Area Appraisal & Management Proposals

	Summary of Comments	Respondent Name	Council Response	Proposed Changes to Appraisal
1.	The two canal pictures on p.124 have the captions the wrong way round	Will Thurley	Comment noted	Change captions
2a.	Indigo Planning has been instructed by Berkhamsted School to undertake an assessment of Dacorum Borough Council's 'Berkhamsted Conservation Area Character Appraisal and Management Proposals' (BCACA), currently published for consultation until 9 November 2012. The School welcome this opportunity to make representations on the BCACA.	Indigo Planning on behalf of Berkhamsted School	Response welcomed	No Change
2b.	Berkhamsted Collegiate School is by some way the largest landholder and employer within Berkhamsted and since 1541, has contributed significantly to the cultural and economic well being of the town. This is largely due to the prudence and foresight of the Governors who, amongst other things, are obliged to ensure that the School can provide facilities that are commensurate with the demands of modern teaching both now and in the future. With this in mind, the proposed heritage designations within the BCACA have been carefully assessed as they potentially have considerable implications for the school estate strategy.	Indigo Planning on behalf of Berkhamsted School	Comment and points noted. DBC fully recognises the crucial role Berkhamsted School has played in the town, and its status as the largest landholder and employer in Berkhamsted. The Appraisal fully acknowledges the impact of the School on the development of the town. Heritage designations are made using objective criteria relating to the merits of the buildings involved and their setting.	No Change
2c.	It is noted that the BCACA proposes a number of boundary extensions to the Berkhamsted Conservation Area. One extension covers part of the School's Kings Road campus. It also	Indigo Planning on behalf of Berkhamsted School	Comment on the proposed extensions is given below. The criteria for local listing have been applied to all buildings in the	Following meeting with the school, the boundary to Extension 3 will be modified to exclude the school

	<p>proposes the designation of a substantial number of buildings within the School estate as 'locally listed'.</p> <p>These designations are important as when set against existing and emerging heritage policies in the Local Plan, they may restrict the potential for alteration or redevelopment of the buildings and sites in question.</p>		<p>Conservation Area. 'Local Listing is not intended to prevent change and development. English Heritage have been invited to assess the buildings within the School Estate.</p>	<p>buildings</p>
2d.	<p>Local heritage listing is a means for a community and a local authority to jointly identify heritage assets that are valued as distinctive elements of the local historic environment. If done well it provides clarity on the location of assets and what it is about them that is significant.</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>The Local Listing suggestions came from the Community and the consultation process itself sought responses to the proposals. (Refer to Items 9 &amp; 11)</p>	<p>DBC carried out a further exercise to provide descriptions for all the proposed locally listed buildings, and these were consulted upon during November 2013. (See Annex 3)</p>
2e.	<p>Mindful of this, our representations will aim to identify those heritage designations that have not been sufficiently justified and therefore are unwarranted or unnecessary.</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>The justification for proposing the local listings lies in the process of consulting the community as well as following English Heritage guidance on Local List Selection Criteria (see Appendix 3) and as fully explained on p.4.</p>	<p>DBC offered to enter into a Heritage Partnership Agreement with the School, but this was rejected. English Heritage have been asked to assess all the buildings within the School Estate.</p>
2f.	<p>It is significant that that almost all of the estate (and all of the proposed local listing whose designations we shall be objecting to) already falls within the existing Berkhamsted Conservation Area allowing the Council a greater degree of control over design and demolition of buildings than might be the case outside the Conservation Area.</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>English Heritage guidance states that Conservation area appraisals 'may provide a useful starting point for the preparation of a local list'. The historic environment can be better cherished if the spirit of place is recognised. Identification of local heritage assets is a requirement set out in the NPPF. Para 129 states that LPA's should identify and assess the particular</p>	<p>No change</p>

			significance of any heritage asset that may be affected by a proposal. The definition of a heritage asset includes those identified by the LPA as local listings.	
2g.	In addition to commentary on individual designations we will also assess whether the Conservation Area Appraisal as a Supplementary Planning Document (SPD) accords with relevant guidance, notably produced by English Heritage, and therefore provides a sound basis for decision making.	Indigo Planning on behalf of Berkhamsted School	The Conservation Area Appraisal is not SPD and English Heritage 'guidance' is not intended to be prescriptive.	No change
2h.	<p>Before any detailed commentary on form and content of the BCACA we wish to highlight some errors in addresses at Appendix 2 where the list of Undesignated Heritage Assets (or proposed locally listed buildings) are set down.</p> <p>Under Castle Street, No.62 is listed (as St. Georges). If the intention is to list the old Temperance Hotel, which is also known as St. Georges, its correct postal address is No.60 Castle Street as opposed to No.62. A photograph of the property at page 185 compounds this error by referring to No.62.</p> <p>Also under Castle Street, Berkhamsted School Deans' Hall and 'and the Deans' Hall Foyer' are proposed to be listed. The School do not recognise the name 'Deans Hall Foyer'. This building has always been referred to as 'The Cloisters' so any revised reference should refer to the 'Deans' Hall and The Cloisters'</p>	Indigo Planning on behalf of Berkhamsted School	The incorrect details are noted and will be amended accordingly	<p>Change No 62 to No 60 and amend photo caption (p.185)</p> <p>Change 'Deans Hall Foyer' to 'Cloisters' (p.180)</p>
2i.	Setting aside errors relating to addresses, we	Indigo Planning on	The process of producing this	Include references to latest

<p>are significantly concerned by what we regard as a fundamental shortcoming of the BCACA, that is reference to out of date guidance. The BCACA refers at page 173 in its 'Further reading and Sources of Information' postscript to three key advisory documents (English Heritage.2005. <i>Guidance on Conservation Area Appraisals</i>, English Heritage.2006. <i>Guidance on the Management of Conservation Areas</i>, English Heritage <i>Good Practice Guide for Local Listing Identifying and Managing Significant Local Heritage Assets</i> Draft Feb 2011). Reference to the latter document is also made at Appendix 3 (Page 205).</p> <p>These are all out of date and have been superseded by a raft of new advice (English Heritage. <i>Good Practice Guide for Local Heritage Listing</i> May 2012, <i>Understanding Place: Conservation Area Designation Appraisal and Management March 2011 &amp; Understanding Place: Historic Area Assessments: Principles and Practice Revised</i> June 2012). Notwithstanding this reference to these earlier documents, the approach taken within the BCACA fails to reflect suggested benchmarks within this earlier superceded guidance.</p> <p>We have reviewed the BCACA against the most recent guidance and have significant concerns that as a Conservation Area Appraisal Document it does not take account of advice contained therein on approach,</p>	<p>behalf of Berkhamsted School</p>	<p>document commenced in 2010. It is intended for web publication only and will be updated according to the timescales given. The references to the latest guidance on Local Listing will be included.</p> <p>The guidance referred to is intended to be guidance and is not prescriptive.</p> <p>However, DBC also does not agree with the statement that the approach, structure, content and presentation of the Berkhamsted Conservation Area fail to follow the approaches recommended in the general guidance. The <i>Good Practice Guide for local Listing 2012</i> enshrines and builds on the draft guidance; the draft selection criteria in Appendix 3 in the BCACA appear in exactly the same form on p.16 of the published Guide.</p> <p>Similarly, there is nothing in the <i>Conservation Area Designation Appraisal and Management March 2011 &amp; Understanding Place: Historic Area Assessments: Principles and Practice Revised</i> June 2012) that would have caused us to make changes to the draft document. Both documents also include a single page revision note acknowledging the introduction of the NPPF and the fact that these publications are themselves</p>	<p>guidance on local listing, otherwise no change</p>
--	-------------------------------------	--	---

	structure, content and presentation.		<p>being revised. We would draw attention to the 'Key Benefits' of a historic assessment listed on p.2 which we consider the BCACA more than adequately delivers including 'identifying assets suitable for inclusion in a Local List'.</p> <p>The format of this appraisal does deliberately follow all previous Appraisals produced by DBC to ensure consistency across the suite of documents, although of course chronologically they absorb policy and legislative changes affecting Conservation Areas.</p>	
2j.	Although providing considerable detailed description of historic development of the town and of many individual buildings does not articulate an understanding as to what the town's form is, what is special or important, and what/why the different character areas are defined;	Indigo Planning on behalf of Berkhamsted School	<p>The Character and Appearance of the Conservation area are fully explored and articulated p33-p44.</p> <p>The Character Areas are fully defined and described pp,45-112. P.45 and 46 explain why the character areas that had previously been identified have been further refined.</p>	No change
2k.	Provides no reference to, or understanding of, 'significance' - a fundamental concept in conservation of the historic environment which long predates both the National Planning Framework and its predecessor PPS5;	Indigo Planning on behalf of Berkhamsted School	We agree that 'significance' plays a key role in understanding the importance of individual heritage assets. The NPPF places the onus on the LPA in a conservation area appraisal to ensure that an area justifies designation' because of its special architectural or historic interest', and as noted by Indigo Planning in 2l. below. (127) The	DBC offered to enter into a Heritage Partnership Agreement with the School, but this was rejected. English Heritage have been asked to assess all the buildings within the School Estate. Descriptions of locally listed buildings all refer to their significance.

			<p>NPPF places the principal onus on 'an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting' (128) when determining planning applications.</p> <p>The significance of the School Estate's buildings would have been assessed fully through the Heritage Partnership Agreement.</p>	
21.	<p>Does not fully examine the 'special architectural or historic interest' of the Conservation Area. For example the 'Analysis and Summary of Townscape Features' covers 4 pages out a total 172 with no clear succinct explanation of what the special interest is that warrants the designation, notably of the additional areas to be included in the boundary. EH guidance is clear in requiring the special interest of each zone within the Conservation Area to be evaluated and that the values attributed to the area by the local community and all those with a stakeholder interest is an important consideration. Key elements in defining 'special interest' are likely to be, amongst <i>other</i> things, the relationship of the conservation area to its setting, the effects/impact of the area's historic development on its plan form, character and architectural style and social/historic associations and how the places within it are experienced by the people who live and work there and visitors to the area. It is our view that the BCACA fails to include these considerations;</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>We consider that the Appraisal has amply demonstrated, through the whole analysis, the special architectural and historic interest of the Berkhamsted Conservation Area. The Analysis and Summary is a prequel to the full analysis that follows p.36-p.159, including area analyses repeated in each of the three subsequent chapters relating to Character Areas, Buildings and Negative Features. The Character Areas also build on the 'Identity Areas' which were defined nearly a decade ago by the Borough Council in Supplementary Planning Guidance May 2004.</p> <p>Analysis of the Conservation Area's</p> <p>a) setting appears on pp1-2 and pp.5-9</p> <p>b) impacts of development on</p> <ul style="list-style-type: none"> <li>- its plan form, character and architectural style and social/historic associations in Street Pattern and building plots; Chaps. 3 (Historic</li> </ul>	<p>No change</p>

			<p>Development); 4 (Historic Features) and particularly for all of these through Map 18 on p.135 which identifies for the first time 'Negative and Neutral Sites' in the Conservation Area.. c) the full consultation process was designed to bring out local and visitors views of place and has fully validated the Appraisal.</p>	
2m.	<p>Fails to include adequate map based information, notably there is no detailed maps of proposed boundary extensions and no townscape appraisal maps. As we note later in these representations when referring to the proposed alterations to the Conservation Area boundary there is only a small scale, difficult to read map (Map 20) at the end of the document. Relevant English Heritage Guidance on graphic presentation within Appraisals suggests amongst other things, a townscape analysis map be included, showing spatial issues such as important views into and out of the Conservation area. Although there is a list and photographs of the proposed buildings to be included on the local list, a clear and legible map of the designations is not included;</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>The Map showing the proposed Boundary extensions is included on p169. (Map 20) We agree that each area should be represented at a larger scale.</p> <p>The relevant emphasis in <i>Understanding Place: Conservation Area Designation, Appraisal and Management</i> is given on p. 8 where it is stated in the paragraph on Presentation and the use of graphic illustration that the latter '<i>might</i>' include the type of representation referred to by Indigo.</p> <p>Careful consideration has been given in the past to including 'Important views and spaces' however DBC has in fact decided to exclude maps detailing Views into and Out of Conservation Areas from all of its Appraisals. We do not agree that these are helpful and indeed can have the opposite effect, because for example, views change depending on</p>	<p>Provide larger scale maps of Extensions 1-4 on p.170.</p>

			<p>the season and also are virtually meaningless in a valley-bottom settlement where there are an infinite number of subtly changing views into the Conservation Area from both adjacent ridges.</p> <p>We agree that a Map of Locally Listed Buildings would be helpful and this will be provided</p>	Produce a Map of Locally Listed Buildings
2n.	<p>Although identifying numerous local listed buildings in the Appendices, the BCACA fails to provide a thorough, criteria based approach as to how these buildings have been individually selected. Appendix 3 of the BCACA outlines the English Heritage list of national selection criteria however no individual appraisal or rationalisation for the inclusion of buildings and their significance is applied. Crucially the bespoke EH guidance on Local Heritage Listing states on page 24 that when identifying local heritage assets '<i>Regardless of the means by which candidates assets are identified, at a minimum, nominations need to be backed by information of sufficient detail and accuracy to demonstrate that they meet the requirements set by the selection criteria</i>';</p>	Indigo Planning on behalf of Berkhamsted School	<p>The selection of locally listed buildings has been carried out without rigorous criteria being applied and with adequate consultation.</p> <p>a) This Appraisal goes beyond the note in the <i>Good Practice guide to Local Heritage Listing</i> p.12 which states that '<i>conservation area appraisals and management plans may provide a <u>useful starting point</u> for the preparation of a local list</i>' (our emphasis) by including a full survey of proposed locally listed buildings</p> <p>b) The survey adopted the English Heritage national selection criteria – this provides consistency and does not necessarily require tailoring to local circumstances – we believe the criteria apply</p>	<p>DBC carried out a further exercise to provide descriptions for all the proposed locally listed buildings, and these were consulted upon during November 2013. (See Annex 3)</p> <p>DBC offered to enter into a Heritage Partnership Agreement with the School, but this was rejected. English Heritage have been asked to assess all the buildings within the School Estate.</p>



			<p>well to an urban settlement such as Berkhamsted which has a diverse range of building types of differing periods, construction etc.</p> <p>c) The English Heritage guidance is, again, guidance and is not prescriptive</p> <p>d) Reference is made on p.4 and also in Appendices 2 &amp; 3 to locally listed buildings, the last stating that:</p> <p>‘This Conservation Area Appraisal does not attempt to identify all buildings that make a positive contribution to the conservation area as there are too many, however, it <u>proposes that the following criteria are appropriate to use</u> when the contribution of any particular building needs to be assessed:</p> <p><b>The contribution made by unlisted buildings to the special architectural or historic interest of a conservation area</b> (Guidance on Conservation Area Appraisals, English Heritage, 2006: Appendix 2)</p> <p>1. Is the building the work of a particular architect of regional or local note?</p> <p>2. Has it qualities of <b>age, style, materials</b> or any other</p>	
--	--	--	--	--

			<p><b>characteristics</b> which reflect those of at least a substantial number of buildings in the conservation area?</p> <p>3. Does it relate by age, materials or in any other historically significant way to <b>adjacent listed buildings</b>, and contribute positively to their setting?</p> <p>4. Does it individually, or as part of a <b>group</b>, serve as a reminder of the gradual <b>development of the settlement</b> in which it stands, or of an earlier phase of growth?</p> <p>5. Does it have <b>significant historic association with established features</b> such as the road layout, burgage plots, a town park, or a landscape feature?</p> <p>6. Does the building have <b>landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces</b> with a complex of public buildings?</p> <p>7. Does it reflect the <b>traditional functional character</b> of, or <b>former uses</b> within, the area?</p> <p>8. Has it <b>significant historic associations</b> with local people or past events?</p> <p>9. Does its use <b>contribute to the character or appearance</b> of the conservation area?</p> <p>10. If a structure is associated with a designed landscape within a conservation area, such as a significant wall, terracing or a minor</p>	
--	--	--	---	--

			<p>gardenbuilding, is it of <b>identifiable importance to the historic design?</b></p> <p>BEAMS have extensive experience of applying these criteria through consulting on and drawing up local lists. The Conservation &amp; Design Team at DBC also met with the three BEAMS Officers involved in the appraisal to carry out an on-site assessment of buildings that should be included. Descriptions including an analysis of their significance have been produced for each building proposed which were subject consultation during November 2013.</p>	
2o	<p>Omits to mention any process of overview/scrutiny or community involvement in either the preparation of the BCACA itself or in the drawing up of the proposed local list which EH guidance on both Local Listing and the preparation of Conservation Area Appraisals states should be in place. The guidance on Conservation Area Appraisals is explicit in stating at 1.11 (Community Involvement) that <i>'the values held by the Community are likely to add depth and a new perspective to the local authority view'</i>. Similarly the guidance on local heritage listing states that <i>'when preparing a local list, public meetings, exhibitions and web launches can be effective forums for bringing together interested partners before the process of identifying heritage assets gets underway'</i>. The advice also refers to public nomination,</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>Both the Local History Society and The Berkhamsted Citizens Association were asked to contribute/comment on the local list: (See below 9 &amp; 11)</p> <p>The following was received from the Local History and Museum Society. "All in all, I think this is a very comprehensive and well-produced document which gives a good summary of Berkhamsted as it is today. I write this as a citizen of Berkhamsted for more than 43 years and as Chairman of the Berkhamsted Local History &amp; Museum Society. Jenny Sherwood 11<sup>th</sup> October 2012. The Berkhamsted Citizens</p>	<p>All owners of locally listed buildings were consulted and DBC carried out a further exercise to provide descriptions for all of the locally listed buildings – these were subject to a further consultation during November 2013. (See Annex 3)</p> <p>Final document to record details of the full consultation process and changes made as a result</p>

<p>use of Historic Environment Records (HERS) and selection panels to assess nominated assets. There is little or no mention of any public consultation or liaison and whether it has occurred in any form in the BCACA.</p>		<p>Associations responded to the consultation by stating that it “is fully in support of the proposed four extensions to the Conservation Area, the application of Article 4 Directions and the establishment of Locally Listed Buildings.”</p> <p>All owners of proposed locally listed buildings were notified of their proposed inclusion in the Appraisal prior to the Consultation Period. The Consultation Period itself was of course a vehicle for them and any members of the public to comment on proposed inclusions in the list of locally listed buildings. We also held the manned exhibition in the market and the static exhibitions in order to gather public opinion. In addition to the above:</p> <ul style="list-style-type: none"><li>• The formal consultation period covered a four week period from 1<sup>st</sup> October – 9<sup>th</sup> November 2012.</li><li>• The draft document could be viewed throughout the period on Dacorum Borough Council’s website and at the Council’s offices</li><li>• A formal notice was placed in The Gazette on 26<sup>th</sup> September 2012.</li><li>• DBC also carried out an online Survey</li></ul>	
--	--	---	--

			<ul style="list-style-type: none"> <li>• An exhibition was held in Berkhamsted Library from 1<sup>st</sup> October to 9<sup>th</sup> November.</li> <li>• Dee TV were commissioned to make a film about the consultation</li> <li>• A market stall in Berkhamsted was manned by the Conservation &amp; Design Team on Saturday 6<sup>th</sup> October 2012</li> <li>• .A further consultation took place in November 2013 when all owners were invited to correct or add information to the descriptions</li> </ul>	
2p	<p><u>Conservation Area Boundary Changes – Extension 3</u></p> <p>The BCACA at page 169 proposes boundary changes to the existing Berkhamsted Conservation Area. Extension 3 includes Kings Road, east side (Area 3) and the proposals are worded as follows:</p> <p><i>‘The extension would include part of Berkhamsted Collegiate School on Kings Road (the older school buildings on the site) to encompass Butts Meadow recreation ground and the neighbouring allotments. The inclusion of the school building on Kings Road would adjoin those Collegiate school buildings that currently stand within the boundary along Doctor’s Commons Road’.</i></p> <p>The appraisal seeks to justify including this area within the Conservation Area by stating</p>	Indigo Planning on behalf of Berkhamsted School	<p>The focus of Extension 3 is a vitally important open space, with clear historical associations, within a Town which is short of green spaces, and in that respect potentially requires less elucidation than the other proposed Extensions. The buildings that ‘frame’ Butts Meadow clearly have a visual impact on the space – those to the North and West sides already form part of the Conservation Area while the inclusion of the allotments on the East side provides a requisite buffer to the developments off Chesham Road.</p> <p>We agree that including only part of the Kings Road campus would create confusion.</p>	Following meeting with the school, the boundary to Extension 3 will be modified to exclude the school buildings and the reasoning regarding the extension will be expanded.

<p>that:</p> <p><i>'this extension has been proposed as the sites are considered to be important open spaces and buildings of visual and historic interest for the conservation area.'</i></p> <p>We consider the reasoning for this extension, in that it relates to the school buildings, wholly insufficient and inadequate and we note the reasoning for this extension is significantly less than put forward for Proposed Extensions 1 and 2. There is an absence of any sound or reasoned argument for inclusion of the older school buildings in the Conservation Area boundary either at the 'Boundary Changes' section of the BCACA or in the description of the Character Areas at Page 110 where the main school building is described at paragraph 6.201 as 'notable'. We would expect in this section to see some argument as to why the building can be considered to be of 'notable quality'? Whilst the older School buildings on the King's Road campus are solid, sturdy and entirely fit for purpose we disagree with the suggestion that they could be described as being of 'notable quality'.</p> <p>Attached to the older buildings, and within the proposed boundary is a substantial three storey 1950's school building. This element can only be described as functional. In summary none of the period buildings on the campus have a true landmark quality, are not the work of a famous architect, they do not reflect other elements of the conservation area in terms of style materials or form and they do</p>		<p>We also agree that the reasoning has not been sufficiently articulated in the BCACA and should be expanded so that the qualities of the extension are fully understood.</p>	
---	--	--	--

<p>not relate particularly in any way to adjacent designated heritage assets i.e. the existing conservation area. Although visually unobtrusive there is no evidence put forward by the Council in the BCACA as to the buildings visual or historic interest.</p> <p>In addition to a lack of analysis, the proposed new boundary is unclear. This is as a result of the inadequately scaled Map 20 and the fact that map used appears to be out of date and fails to show the footprint of the new school buildings. This makes comprehension of the new boundary extremely difficult. At the very least a more detailed and updated inset similar to that used for Extension 4 should be incorporated. The suggestion in the existing Map 20 is that the new boundary would rather impractically appear to cut through the School's built demise where the older building meets the recent and attractive new extension. A revised boundary line such as this would be inappropriate. English Heritage advice is explicit and states in their 2012 guidance on conservation area designations that:</p> <p><i>'The desirability of a unified approach to their management including long term use and boundary treatments suggests that in almost all situations the Conservation area boundary runs around rather than through a space or plot.'</i></p> <p>We also note that the Conservation Area boundary has been extended twice since its original designation in 1969. The last time was 1994 which set the boundary down King's</p>		<p>We do not have access to any background material on the 1994 review; however, it is wholly surprising that Butts Meadow was excluded from this review. The new NPPF places more emphasis on holistic approaches and sustainability and appreciation of the importance of open spaces and spaces between buildings in Conservation Areas has steadily grown in importance. The weight of evidence is therefore the reverse of what has been stated by Indigo – there would appear to be no good reason why Butts Meadow and the allotments had previously been excluded.</p> <p>The results of the on-line survey demonstrates that the proposed four extensions all received strong support, the percentage of those 'strongly agreeing' or 'agreeing' in each case being:</p> <ul style="list-style-type: none"> <li>• Extension 1: St Johns Well Lane (79.5%)</li> <li>• Extension 2: London Road (83.0%)</li> </ul>	<p>No change</p>
---	--	---	------------------

	<p>Road. We would ask why the Council did not consider the older school buildings worthy of inclusion within the boundary at that time. The proposed inclusion through the current consultation exercise would normally signify the Council has been presented with new evidence to justify the buildings inclusion. We are unaware of any new evidence and it would appear not to be put forward in the BCACA.</p>		<ul style="list-style-type: none"> <li>• Extension 3: Kings Road (78.8%)</li> <li>• Extension 4: Montague Road (77.2%)</li> </ul>	
2q	<p><u>Proposed Locally Listed Buildings</u></p> <p>The BCACA proposes an extensive list of locally listed buildings. A Local Heritage List is evidence of heritage assets in an area that a Council consider have a degree of significance and therefore merit additional consideration in planning decisions. Any inclusion on the local list should be made on the basis that it satisfies the requirements set by selection criteria found with relevant English Heritage Guidance referred to earlier in these representations. The criteria are actually listed at Appendix 3 of the BCACA and although the draft version of the English Heritage guidance is referred to, the national criteria are still the same. Given the reference to the criteria at Appendix 3 it is therefore anomalous that the Council, although identifying numerous buildings for potential local listing in the Appendices, fails to provide a criteria based approach as to how these buildings were individually selected for inclusion.</p> <p>Crucially although there are brief descriptions of the School's buildings within the Character</p>	<p>Indigo Planning on behalf of Berkhamsted School</p>	<p>We would refer to our answers above to 2n. and 2o, and in particular the proposal for English Heritage to assess the School Estate's buildings. DBC has now provided full descriptions with an analysis of their significance for each of the proposed buildings.</p>	<p>DBC carried out a further exercise to provide descriptions for all the proposed locally listed buildings, and these were consulted upon during November 2013. (See Annex 3)</p> <p>DBC offered to enter into a Heritage Partnership Agreement with the School, but this was rejected. English Heritage have been asked to assess all the buildings within the School Estate.</p>



<p>Area Assessments (see descriptions at 6.108, 6.111 &amp; 6.112) our view is that these are wholly inadequate and serve only to highlight how the buildings cannot be considered significant from a heritage asset perspective.</p> <p>It is important to note that the School do not wish to raise a blanket objection to the proposed local listing of properties within their estate portfolio. This is in acknowledgement that properties such as St. John's should be recognised for its significant historic association with Graham Greene and buildings such as the Lychgate and the Deans Hall and the adjoining Cloisters are clearly of architectural merit. In the case of the Lychgate the feature has landmark status and is striking in its aesthetic value.</p> <p>We wish to object to the following buildings being included for Local Listing. It is considered that there is an almost complete absence of any robust analysis or justification as to why the buildings deserve to be locally listed and are in any way 'significant' against the relevant English Heritage May 2012 Good Practice Guidance:</p> <p>Berkhamsted Preparatory School, Kings Road Frontage; Adelbert House, Mill Street; Gym Building, Mill Street; Music School, Mill Street; Staff Cottages, 2, Mill Street; and St Georges (Former Temperance Hotel), 60, Castle Street:</p>		<p>There are further fuller descriptions of the School buildings in 6.104-7, 6.109, 6.110, and these, together with the paras. referred to, plus other numerous references scattered as appropriate throughout the BCACA provide an exclusive and detailed assessment of the school premises.</p> <p>The enthusiasm to embrace St John's, the Lychgate, Deans Hall and adjoin Cloisters is noted.</p> <p>As noted above, the selection criteria applied are precisely the same as those included at Appendix 3 of the BCACA.</p> <p>We believe the inclusion of all these buildings are fully justified against the selection criteria adopted, together with the support noted elsewhere from Berkhamsted Local History &amp; Museum Society and Berkhamsted Residents Association.</p>	
--	--	--	--

<p>Although not unattractive, we consider that the above buildings do not have the intrinsic aesthetic value which merits the additional protection that local listing designation offers. None of the buildings can be classed as particularly rare, there is no group value attached to any of the buildings and most, if not all, were built at different times in the last century. We would strongly refute the suggestion in this section that 60, Castle Street, St Georges, date from the Seventeenth Century. No significant historic association has been ascertained for any of the buildings, nor could any of the buildings be truly described as 'landmark'.</p> <p>In summary therefore we wish to register formal objection on behalf of Berkhamsted School to the draft Berkhamsted Conservation Area Character Appraisal. In particular we object to proposals for extending the boundary of the Conservation Area off Kings Road and to a number of proposed entries on the list of locally listed buildings. We look forward to receiving acknowledgement of these representations</p>		<p>We have now helpfully been provided with further information on the history of these buildings from the school archives which has been added as part of the local listing descriptions.</p> <p>We agree with the analysis that 60 Castle Street is not correct and acknowledge this as an error – the Appraisal intended to refer to its design as echoing its C17th (or earlier) predecessor on the site. The significance of the building is greater than the Appraisal acknowledges: this building, constructed on Brownlow land, may have been a pioneering C19th design for a pre-fabricated building. Its historical importance as a Temperance Hotel is also of considerable significance.</p> <p>The Governors of Berkhamsted School are custodians of a highly significant complex of educational buildings dating from the C16th through to the 21<sup>st</sup> century, and we offered the school the opportunity of working with us to ensure that the significance of the whole site is better understood so that appropriate conservation standards are applied across the portfolio of buildings and to guide any future developments that</p>	
--	--	--	--

			are undertaken.	
3,	Request that 'the Berkhamsted Conservation Area boundary be extended to include Number 17 Anglefield Road (adjacent to the Pines.) ...the house is very similar in style to that of the Pines, is of an earlier date and would, I think, comply with the criteria as set out by English Heritage as regards its setting etc.	Laurence Handy	Agree that No 17 should be assessed further for possible inclusion	Carry out an assessment of No. 17 Anglefield Road.and, if appropriate, make a recommendation for inclusion
4.	<p>Proposed Local Listing 258/260 High Street – objection on behalf of client.</p> <p>The property is already located within a Conservation Area which provides a high degree of protection against unacceptable development and also ensures that history, character and uses are properly managed and maintained in a manner consistent with Conservation Area objectives.</p> <p>A further layer of bureaucracy and regulation introduces greater financial obligations on occupiers, tenants and investors. This will adversely affect rental and capital values so deterring the very people Councils should be encouraging to attract to ensure that businesses can prosper and values can be maintained.</p> <p>Town centres are in decline throughout the country for a variety of reasons and Central Government is very concerned to encourage businesses both to survive and to expand. Various studies have been commissioned to understand how this can be achieved – eg</p>	K.C. Martindale FRICS of Stream Partners Ltd on behalf of owner	<p>Reply 24/10/12</p> <p>Thank you for sending the representation on behalf of Suitcrown Limited regarding the proposal to include 258/260 as a locally listed building.</p> <p>All your points will be included in the consultation response statement which will be compiled once the consultation ends on November 9<sup>th</sup>.</p> <p>You raise a series of general objections concerning the role of local listing as regards the overlap with Conservation Areas, its potential impact on capital and rental values, the perceived relationship of heritage asset designation to town centre decline and specifically its harmful impact on the business community.</p> <p>On these points:</p> <p>1. Local listing is a well-</p>	No further representation received – therefore no change

<p>Mary Portas who has carried out an independent study of the High Street – and it is respectfully suggested that your proposals do nothing to help achieve these aims.</p> <p>At the current time all businesses are struggling with increased overheads and a lack of custom and retailers in town centres are the worst affected. Why therefore does Dacorum Borough Council justify the proposed Listing in the full knowledge that this will damage the business community and drive investment to less regulated environments?</p>		<p>established approach for involving the community in developing a strong sense of place . Please see <a href="http://www.english-heritage.org.uk/caring/listing/local/local-designations/">http://www.english-heritage.org.uk/caring/listing/local/local-designations/</a> for further information and the case for local listing. ‘At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.’</p> <p>2. There is contrary research that suggests capital and rental values are higher for buildings with heritage value and that spend per head increases in relation to the quality of the historic environment.</p> <p>While the justification for local listing is strong, it is important that any buildings being proposed should meet a consistent set of criteria. We have attempted to provide this in the Appendices to the report – see specifically Appendix 3. (Link)</p>	
---	--	--	--

			May I suggest that you submit a further representation which focuses on the reasons why you consider 258/260 High Street fails to meet these criteria. In addition, Appendix 2 provides photographs of all the buildings being proposed and these, along with the criteria, provide a benchmark for judging suitability for inclusion.	
5.	The Board has examined the consultation information with interest and I write to let you know that we have no comments to make	Chilterns Conservation Board	Comment noted	No change
6.	The consultation which we have been offered the opportunity to comment on is of a low risk/priority for Natural England and so we will not be offering representations at this time'	Natural England	Comment noted	No change
7a.	<p>Further to your letter dated 26 September regarding the Berkhamsted Conservation Area Review, we have the following questions regarding the review to assist us in our response.</p> <ul style="list-style-type: none"> <li>• In practice, what will being listed mean to us? i.e. what further constraints will be placed on us over and above the status quo.</li> <li>• Which parts of the building would be listed? Would the listed status affect perimeter areas such as car park and playgrounds?</li> <li>• Could you advise, in practical terms, the difference between Article 4</li> </ul>	(Victoria School)	<p>E-mail 6/11/12</p> <p>Many thanks for your e-mail. You do not mention which property is involved, but I am assuming it will be one of the buildings put forward for Local Listing. To answer your questions:</p> <p>Please be reassured that this building is not being put forward for <u>statutory listing</u>. A 'listed building' is one that has been included on the Secretary of State's List of Buildings of Architectural or Historic Interest and is</p>	No change

	<p>Direction and full listing? I should be most grateful for a response by return as we would very much like to respond prior to the close of the consultation, i.e. November 9 2012.</p>		<p>graded 1, 2* or 2. Such buildings must have special architectural or historic interest to qualify for listing, according to strict criteria drawn up by English Heritage. Statutory listing applies to all parts of the building.</p> <p>Your property is being proposed for <u>local listing</u>. This is not a statutory designation; it represents a locally-driven approach for involving the community in developing a strong sense of place. Please see <a href="http://www.english-heritage.org.uk/caring/listing/local/local-designations/">http://www.english-heritage.org.uk/caring/listing/local/local-designations/</a></p> <p>for further information and the justification for local listing. 'At its heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.'</p> <p>The local list of buildings has therefore been drawn up with the advice and support of local organisations and individuals who agree with the sentiment of protecting the character of Berkhamsted's built</p>	
--	---	--	--	--

			<p>environment. The Berkhamsted Citizens Association for example has commented that it ' is fully in support of the establishment of Locally Listed Buildings.'</p> <p>While the justification for local listing is strong, it is important that any buildings being proposed should meet a consistent set of criteria. We have provided this justification in the Appendices to the report – see specifically Appendix 3. (Link) Appendix 2 provides photographs of all the buildings being proposed and these, along with the criteria, provide a benchmark for judging suitability for inclusion.</p> <p>Local listing recognises that the buildings being put forward are heritage assets and make a positive contribution to the Conservation Area. Under the new National Planning Policy Framework, Local Planning Authorities are required to recognise that 'heritage assets are an irreplaceable resource' and to 'conserve them in a manner appropriate to their significance.' Local listing therefore offers an opportunity for the Local Planning Authority in partnership with owners, organisations and the local community to highlight further the significant</p>	
--	--	--	--	--

			<p>contribution made by the historic environment to the character of a place.</p> <p>The Conservation and Design team fully recognise the vital contribution made by owners to maintaining and repairing their heritage assets and local listing does not impose any further tier of bureaucracy in terms of added repair obligations. In terms of planned extensions and changes, local listing would mean that any proposals would be judged in terms of any positive contribution they would make to the character and appearance of the building. Any proposal for the demolition of the building would be considered, as currently, in terms of conservation area consent and the impact this would have on the character of the Conservation Area. The purpose of local listing in a conservation area therefore is rather to ensure that re-development of any negative or neutral sites in or close to locally listed buildings reinforce the character of the historic built environment in a positive manner. And on a similar positive note, research shows that recognition as a heritage asset does tend to raise property values.</p>	
--	--	--	---	--



			<p>It is perhaps also worth pointing out that local listing status does itself tend to remove the ambiguities that surround some properties– without local listing, they may remain on the threshold of being eligible for statutory listing; now, having been through a thorough assessment carried out for the Conservation Area Appraisal, they have been assessed as being of local significance but not recommended for inclusion on the statutory list.</p> <p>2. Local listing applies only to the property itself and focusses on the contribution the building makes to the overall street scene.</p> <p>3. it is the process of adding Article 4 Directions which adds the requirement to apply for permission for various works to the exterior of a building – usually applied to elements of the façade such as roof, windows, front doors, garden railings – these already apply to buildings in, for example, Chapel Street and, as the Consultation mentions, the intention is to roll these out to other streets in Berkhamsted in the future. If this was to apply to your property, you would be given notification and then have 6 months to raise any objections or comments.</p>	
--	--	--	--	--

7b.	<p>Our Governors have concerns over the potential implications for us.</p> <p>The Governors are still unclear as to the impact the review would have on us as a school and I would be most grateful if you could give us clear advice on the following:</p> <p>Should we wish to change our exterior façade in the future, e.g the perimeter fencing or replace doors, would this mean an additional cost or cause us delay in carrying out the project?</p> <p>Would we need to make changes to our existing set up? I.e remove the existing blue safety screening from the top playground fencing adjacent to Butts Meadow or remove security lighting?</p>	Victoria First School, Prince Edward St	<p>Reply 21/11/2012</p> <p>Local listing does not impose any further controls over the type of changes you mention and therefore no additional delays would be encountered with carrying out the type of works you mention such as the perimeter fencing and replacing doors. However, the original school building is the focus of interest and we would hope that the Governors would wish to preserve its special identity and character by ensuring that any repairs were carried out in a like-for-like manner and that future alterations and changes to any curtilage buildings also respected its character.</p> <p>Local listing also does not require you to carry out any additional changes to remove items such as the safety screening and security lighting.</p>	No change
8.	Hertfordshire County Council is currently consulting on the Berkhamsted Urban Transport Plan which will describe highway and transport improvements envisaged for the town. None of these will involve significant widening or land take.	Hertfordshire County Council	Comment noted	No change
9.	<p>I am writing on behalf of the Berkhamsted Citizens Association in response to the current consultation on the draft Berkhamsted Conservation Area Character Appraisal.</p> <p>We welcome the hard work that had gone into</p>	Paul Crosland Chairman, Town Amenities Sub-committee, Berkhamsted Citizens Association	BCA thanked for its strong, supportive statement in response to the consultation and for having taken the trouble to scrutinize the Appraisal and for putting forward such a positive acceptance of the proposals.	No change

	<p>preparing the Appraisal document and Appendices, and its comprehensive nature creates an excellent reference document and benchmark for the future management of the Conservation Area.</p> <p>The Berkhamsted Citizens Association is fully in support of the proposed four extensions to the Conservation Area, the application of Article 4 Directions and the establishment of Locally Listed Buildings. We feel that the latter developments recognise the hard work over the years by the Berkhamsted Citizens Association, and in particular the work of former BCA Chairman and Berkhamsted Town Mayor, John Cook, who created a photographic record of the heritage assets in the town and was instrumental in setting up the Berkhamsted Town Walk.</p>	Berkhamsted Citizens Association		
10.	Error on Map 10 – should show 29 High Street (Curry Garden restaurant, former Black Horse PH) as a listed building, but it has been missed off	John Chapman DBC	Error noted	Change to show 29 High Street as listed building
11.a	I am uncertain when exactly this appraisal was begun but the name 'Berkhamsted Collegiate School' is no longer used. The school has reverted to the name Berkhamsted School. This connotation is used in the accompanying DeeTv video.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	The Appraisal was commenced prior to the School reverting to the name Berkhamsted School. However, agreed that references should be changed to 'Berkhamsted School'	Change references from 'Collegiate' to 'Berkhamsted School'
11b.	One or two typing errors. Castle Hill, not Castle Hill Road. In Castle Street, not St. George's School. As is stated later on this was a	Jenny Sherwood, Chairman of the Berkhamsted Local	Typing errors noted Reference to St George's already noted in 2h & 2p.	Change Castle Hill Road to Castle Hill. (2.6)

	temperance tavern built by the Brownlows in mid 19 <sup>th</sup> century. It later became a school house of Berkhamsted School and still belongs to the School. It should be 'Stag Lane' not 'Land'. In one place the Upper Mill is referred to as the Lower Mill (6.122)	History & Museum Society		Change 'Stag Land' to 'Stag Lane' (3.20)  Change Lower Mill (6.122) to Upper Mill
11c.	.Egerton House, an Elizabethan house may originally have been a dower house for Ashridge but this is uncertain.Egerton House was not owned by Edward Greene. He did draw up plans for a cinema but this was sited further east from Egerton House on land of his at the Hall.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Agreed	3.35 Omit reference to 'owned by Edward Greene of The Hall (Berkhamsted Hall)
11d.	In your description of the Castle grounds you mention the rather limited information panels erected in the grounds by English Heritage. These were erected about a year after the Castle Visitor Room was opened with 16 panels devoted to the history of the Castle and its connection with the town. Admittedly this is not open all the time. Ownership of the Castle. The Castle belongs to the Duchy of Cornwall but is managed by English Heritage. It is an unmanned site with a keyholder resident in the cottage. There is evidence in the 1841 census of a cottage in the Castle grounds. The present cottage has the date above the doorway, 1865 and was almost certainly erected by the Brownlows who had just purchased the manor of Berkhamsted, apart from the Castle and the living of St Mary's Northchurch, from the Duchy.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Information panels  Refers to 7.35: Change  Refers to 7.34: Change	No change  7.35 – Take out sentence 2 and replace with 'The Castle belongs to the Duchy of Cornwall but is managed by English Heritage having passed into State Guardianship in 1929.  7.34 Take out second sentence and replace with  'There is evidence in the 1841 census of a cottage in

				the Castle grounds. The present cottage has the date above the doorway, 1865 and was almost certainly erected by the Brownlows who had just purchased the manor of Berkhamsted, apart from the Castle and the living of St Mary's Northchurch, from the Duchy of Cornwall.'
11e.	Berkhamsted Town Hall. It is not accurate to say that the Town Hall is the Brasserie Gerard. The restaurant is only in the ground floor market area of the triple-purpose Town Hall, market house, community rooms and rooms for the Mechanics Institute. This replaced the earlier market house burnt down in 1854. The rooms above the restaurant are let for numerous functions including weddings.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Refers to a) photo caption p.62 b) p.63, 6.51 l.13	a) Omit ( <i>now Brasserie Gerard</i> ) to photo caption on p.62 b) Omit ( <i>now Brasserie Gerard</i> ) on p.63
11 f.	Paxton Road. This is more likely named after William Paxton rather than Joseph Paxton of Crystal Palace fame. They were related. William Paxton was Earl Brownlow's Land Agent and as such was very much involved in the affairs of the town.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Refers to 7.48: Omit ' Paxton Road is believed to have been named after Joseph Paxton.....'	Add 'This road is probably named after William Paxton who was Earl Brownlow's Land Agent and related to Joseph Paxton, the mid – nineteenth century gardener and greenhouse designer whose greatest creation, the Crystal Palace, gave its name to the public house at the West end of the sub-district.'
11 g.	Lower Kings Road. In your report of this you mention Berkeley Galleries but say nothing	Jenny Sherwood, Chairman of the	Refers to 6.101: Expand description to include these details	4.1 Change spelling of Berkley to Berkeley (!st

	about the hay loft window and the writing on the sidewall which describes Meek's stables with victorias etc for hire. This building and firm almost certainly predate the building of Lower Kings Road.	Berkhamsted Local History & Museum Society		bullet, rit hd col.)  6.101 Change to read 'Adjacent is a group of early and mid-nineteenth century yellow brick buildings with red brick detailing/banding incorporating a hay loft window and slate hipped or gables roofs. There is also surviving singnage writing on the sidewall which describes Meek's stables with victorias etc.for hire. The building and firm almost certainly predate the building of Lower Kings road (35-43, Berkeley Galleries and Blakes of Berkhamsted)
11 h.	Extension of the Conservation Area. I endorse this, especially the extension at the eastern end of the town. It is not clear, however, whether New Lodge is included in local listing. This was suggested by English Heritage when the Berkhamsted Local History and Museum Society applied to have the building listed the second time.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Agree	Add New Lodge to Appendix 2: Local List.
11 i.	Buildings suggested for local listing. I agree with most of these. I am not clear from your report whether you are including the Hall Walk with Londrina Terrace and the footbridge all built together by Edward Greene (brother of Charles Henry Greene and uncle of Graham Greene) who lived at the Hall. I feel very	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Ensure Hall Walk is included with Londrina Terrace and the footbridge in the local listing	Add Hall Walk to Appendix 2: Local List

	strongly that Hall Walk should be included since it provides the rationale for the Terrace and the bridge. The Taj Mahal restaurant was also part of the estate and has been converted I think from the coachman's cottage.		Taj Mahal was assessed for local Listing but considered to be too altered for inclusion	No change
11.j	I think it would be worth considering extending the conservation area north of the railway in Gravel Path to include Rosebank (Edward Mawley), Littlehurst (formerly Staghurst) (Mawson garden) and Whitehill Cottage formerly the Kraal, another Mawson garden and the lodge to Millfield, which I have suggested for local listing mostly for historical associations.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Agree this area should be reviewed for possible inclusion	Review whether a further extension to the Conservation Area should be made to include this area
11.k.	In Kings Road I am uncertain how far the conservation area goes. If it goes as far as Kingsdale Road Penrose and Falkland Houses could both be included for local listing. They are also houses with important historical associations.	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	The Conservation Area includes Penrose House and Falkland House. Agree they should be assessed the Local List	Assess Falkland House and Penrose House for adding to Appendix 2: Local List
11.l.	All in all, I think this is a very comprehensive and well-produced document which gives a good summary of Berkhamsted as it is today. I write this as a citizen of Berkhamsted for more than 43 years and as Chairman of the Berkhamsted Local History & Museum Society	Jenny Sherwood, Chairman of the Berkhamsted Local History & Museum Society	Comments noted and JS thanked for her detailed and very helpful comments and for the invaluable contribution Local History and Museum Society to the BCACA	No change
12	Stonycroft, 9 Shrublands Road, Berkhamsted  Stonycroft, and its adjacent houses, are under Article 4 protection and are proposed for 'local listing'. As they are	Sarah Johnson, 9 Shrublands Road, Berkhamsted	Comments noted and SJ thanked for information	Change spelling of Stonycroft to Stonycroft on pps 109, 180 and 204.  Change references on p.109 from 'Edwardian' to Victorian and ascribe the architect


<p>mentioned several times in the Review, I think it important to get the detail right.</p> <p>1 Spelling of Stonycroft. No 'e'. Please amend the text on pages 109, 180 and 204 to reflect this.</p> <p>2 Page 109: Nos. 7 ,9 and 11 Shrublands Road are Victorian (1837-1901) houses, not Edwardian (1901-10). No.7 Mullions is 1898; no.9 Stonycroft is 1893; and no.11 The Rowans is pre-1898 (as it appears on a map of that date). The names Stonycroft and The Rowans are original; Mullions is a modern name.</p> <p>3 Stonycroft was designed by Charles Henry Rew (see attached document) who was a local architect of some note. It is built in the Arts &amp; Crafts style which would have been the height of fashion in 1893. It also incorporates some very modern features such as some cavity walls on the outer skins. It also retains many original interior features such as its green baize door, and servants' rooms in the roofspace reached by a back staircase.</p> <p>I attach information on the house's former owners; and an appeal we put out to try to find others of CHR's domestic output. Kilfillin in Doctors Commons Road is</p>			<p>Charles Henry Rew to Stonycroft.</p>
--	--	--	---



	<p>heavily altered, but Stonycroft stands very much as it did (both internally and externally) the day it was built (with a bigger conservatory, central heating and a garage, I admit!).</p>			
13	<p>We recently received a letter from you proposing that our home (6 Londrina Terrace) be given the status of locally listed building.</p> <p>While we assume that the Council makes this recommendation with the best of intentions, we wish to register our objection to this proposal. As the area in which we live is designated as a conservation area there are already ample restrictions in place to maintain the character and standard of the area. The status of being a locally listed property will, in our eyes, only add further time and cost to any alterations we may wish to do in the future.</p> <p>Our property, like most others in the terrace, has already had windows replaced and an extension added (by previous owners). We would find it disappointing and unfair if at some time in the future we needed to replace windows on a like-for-like basis only to find that that was not possible. Or that we were obliged to go through lengthy and expensive planning processes even to keep our house in its</p>	<p>Christine Avis &amp; Gary Elkington 6 Londrina Terrace</p>	<p>Replied to 22/10/12. Having re-assessed the situation, the objection to the local listing of Londrina Terrace is based on the perception that this would restrict works to the building (which is not the case) rather than because it lacks architectural or historical interest. See also comments in 11j re footbridge and strengthening the local listing by including the Hall Walk</p>	<p>No change</p>

	<p>present condition. In addition, if we were to seek permission to improve the appearance of our house by, for example replacing the current extension we are likely to experience yet more costly planning and building procedures. It seems unreasonable to foist cost and bureaucracy on the home-owner in order to correct past planning short-comings.</p> <p>In our view the Council's efforts and money would be better spent maintaining public areas to a higher standard, for example attending to tree maintenance on the south side of Little Bridge road and improving the appearance of the footbridge itself. These measures would improve the general environment to a greater extent than creating locally listed buildings.</p>			
14	<p>It appears that No 3 Chapel St who received a letter regarding local listing are in fact a garage that is constructed of asbestos and concrete</p>	<p>3 Chapel Street, Berkhamsted</p>	<p>Replied to: the letter was not referring to the garage but to the adjacent Malting on the corner of Chapel and Bridge Street</p>	<p>No change</p>
15	<p>Firstly, I object to being sent two identical letters concerning the proposed listing of Bridge House, 4 Chapel Street. Secondly, I object to Bridge House, 4 Chapel St. being listed as part of the Conservation Area. I do not want Bridge House to be listed. It's further expense &amp; further red tape being piled on at a time when the government is</p>	<p>D.C Beard, Bridge House, 4 Chapel Street, Berkhamsted</p>	<p>Objections noted. Two letters sent as the building stands on the corner of Chapel and Bridge Street. The building, which is already in the Conservation Area, is not being proposed for statutory listing, but for local listing. The objection to the local listing of 4 Chapel Street is based on</p>	<p>No change</p>

	trying to reduce them.		the perception that this would restrict works to the building (which is not the case) rather than because it lacks architectural or historical interest.	
16	I have heard recently that Ashlyns school is now a grade two listed building. I am enquiring as to whether there are plans to make the houses in Coram Close built at the same time for the teachers listed? I also wondered is the area a conservation area or not? I have tried various web searches and not managed to find any information.	Mary Kennedy,	-	Review whether a further extension to the Conservation Area should be made to include this area
17	Letter addressed to D. Zammit by David Gauke MP objecting on behalf of the owner to 'listing' of 128 High Street	David Gauke MP on behalf of Mr Fox, 128 High Street, Berkhamsted	Dear Mr Gauke This building is not being put forward for <u>statutory listing</u> . A 'listed building' is one that has been included on the Secretary of State's List of Buildings of Architectural or Historic Interest and is graded 1, 2* or 2. Such buildings must have special architectural or historic interest to qualify for listing, according to strict criteria drawn up by English Heritage. Mr Fox's property is being proposed for <u>local listing</u> . This is not a statutory designation; it represents a locally-driven approach for involving the community in developing a strong sense of place. Please see <a href="http://www.english-heritage.org.uk/caring/listing/local/local-designations/">http://www.english-heritage.org.uk/caring/listing/local/local-designations/</a>  for further information and the justification for local listing. 'At its	No change

			<p>heart, local listing provides an opportunity for communities to have their views on local heritage heard. It recognises that the importance we place on the historic environment extends beyond the confines of the planning system to recognise those community-based values that contribute to our sense of place.’ The local list of buildings has therefore been drawn up with the advice and support of local organisations and individuals who, like Mr Fox, agree with the sentiment of protecting the character of the High Street. ...While the justification for local listing is strong, it is important that any buildings being proposed should meet a consistent set of criteria. We have provided this justification in the Appendices to the report – see specifically Appendix 3.</p> <ul style="list-style-type: none"><li>•  <a href="#">Berkhamsted Conservation Area Report - Appendices (2,373KB)</a></li></ul> <p>Appendix 2 provides photographs of all the buildings being proposed and these, along with the criteria, provide a benchmark for judging suitability for inclusion. Local listing recognises that the buildings being put forward are</p>	
--	--	--	---	--

			<p>heritage assets and make a positive contribution to the Conservation Area. Under the new National Planning Policy Framework, Local Planning Authorities are required to recognise that 'heritage assets are an irreplaceable resource' and to 'conserve them in a manner appropriate to their significance.' This should 'take into account 'the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring'. Research suggests that capital and rental values are higher for buildings with heritage value and that spend per head increases in relation to the quality of the historic environment. Local listing therefore offers an opportunity for the Local Planning Authority in partnership with owners, organisations and the local community to highlight further the significant contribution made by the historic environment to the character of a place.</p> <p>The Conservation and Design team fully recognise the vital contribution made by owners to maintaining and repairing their heritage assets and local listing does not impose any further tier of bureaucracy in terms of added repair obligations. Indeed, we would respectfully point out that, even</p>	
--	--	--	--	--

			<p>should the building have been statutorily listed, this does not require any additional permissions where like-for-like repairs are being carried out – it is only when changes are being made that listed building consent is required. The purpose of the legislation is rather to support re-development of negative sites and buildings referred to by Mr Fox so that they reinforce the character of the historic built environment in a positive manner.</p> <p>It is perhaps also worth pointing out that local listing status does itself tend to remove the ambiguities that surround properties such as Mr Fox's – without local listing, they may remain on the threshold of being eligible for statutory listing; now, having been through a thorough assessment carried out for the Conservation Area Appraisal, they have been assessed as being of local significance but not recommended for inclusion on the statutory list.</p>	
18	Query re implication of local listing	Robert Brookes, 244-246 High Street	Telephoned and explained difference between statutory and local listing	No change
19	Suggest you consider returning the name of Church Lane back to its former, original name of BACK LANE. As well as being nostalgic for former residents, the name has significant historical interest.	David Allen	Agree with principle and will relay to relevant department.	Relay suggestion to relevant department
20	Proposal (originally raised in 2005) that Castle	Bruce Nixon	Castle Hill Conservation Area	Review whether a further

	Hill should become a Conservation Area (Paper was attached)			extension to the Conservation Area should be made to include this area
21	<p>Network Rail has been sent a letter from a member of the public informing us of the above consultation.</p> <p>The proposal area includes the railway line and Berkhamsted Railway Station yet Network Rail have not been consulted on the matter. Could you please explain if there is any specific reason why you would not consult Network Rail when our land and infrastructure is included within the boundary?</p> <p>Also could you confirm that you are seeking to locally list Berkhamsted Railway Station or any other part of our infrastructure?</p> <p>Can I just add that Network Rail is undertaking works at Berkhamsted Railway Station under the Access for All scheme. The proposal is to put lift shafts in to allow step free access to the subway and platforms. These works were approved by Dacorum Council under Pt11 Prior Approval in May 2012 and the works are scheduled to take place in the near future.</p> <p>Can you confirm that the local listing of Berkhamsted Railway Station will not prejudice the already allowed works as we do not want to seek further approval which could potentially delay or even postpone the project?</p>	Diane Clarke, Network Rail	<p>Apologies if a letter has not reached you yet regarding the public consultation on the Berkhamsted Conservation Area Appraisal. The consultation and questionnaire can be viewed at <a href="http://www.dacorum.gov.uk/default.aspx?page=3119">www.dacorum.gov.uk/default.aspx?page=3119</a></p> <p>The proposed list of locally listed buildings does include the railway station and adjacent railway bridge (p.199 of the Appendices) and railway bridge on Station Road (p.200). The criteria for local listing are included at Appendix 3 (pp.205-208). Responses to the consultation can be received up to November 9<sup>th</sup></p> <p>This is to confirm that the proposed local listing of Berkhamsted Station will not affect any existing granted consents for approved works to the station.</p>	No change
22	I was most interested to read a letter that arrived through my door this morning.	Craig McArdle, 330 High Street,	Comment noted - bot no action requested	No change

	<p>The letter states that my property at 330 High Street Berkhamsted makes a positive contribution to the local conservation area, and it is proposed it should be added to the list of local listed buildings.</p> <p>I had to chuckle to myself, considering Dacorum Council appear to be seriously considering a planning application to build a grotesque property in the garden of my neighbour at 328 High Street.</p> <p>So either the council are going through the motions before deciding against any possible development at 328 High Street, or there are no internal communication between departments at Dacorum Council. I do hope it's the former.</p> <p>I can't change the colour of my door without approval but risk having the quality of my family's life dramatically reduced, should this planning application not be completely dismissed out of hand. Not quite sure if the term 'Conservation Area' is truly understood.</p>	Berkhamsted		
--	---	-------------	--	--