

A National Amenity Society

Ms Kate Broadbank
Planning Case Officer
Harrogate Borough Council
By email: planningconsultation@harrogate.gov.uk

24th January 2022

22-30 Parliament Street, Harrogate, HG1 2RQ. Application No. 21/04955/FULMAJ

Dear Ms Broadbank,

The Council for British Archaeology (CBA) have been made aware of the above case. Based on the information supplied with this application, we offer the following observations and advice to assist your authority in determining the application.

Summary

The CBA strongly object to this application on both heritage and environmental grounds. No justification is presented for clearing the application site to facilitate its reuse. The size and scale of the proposed structure would negatively impact on the Harrogate Conservation Area. The carbon wastage that this scheme would entail is contrary to climate change imperatives that are shared on a local, national and international scale. The CBA strongly recommend an alternative approach to the reuse of this site is developed. At present it is contrary to numerous aspects of policy and legislation that should result in its refusal if it is not withdrawn.

Significance

The application site contains 2 distinct components, both proposed for demolition. The 'northern building' adjoins the Grade II Listed Westminster Arcade (NHLE No. 1149420). It is a 4 story mid-20th century structure, which articulates the phased development of the street but makes little contribution to the character and appearance of the Harrogate Conservation Area. Although its scale and massing mean the building sits quietly within its context. It was built as an extension to the department store in the 'southern building'. This is an early 20th century brick structure with sandstone dressings, mullioned windows and a slate roof. The southern building does make a positive contribution to the character and appearance of the conservation area, and should be considered as a non-designated heritage asset. This architecturally designed and well-constructed purpose built early department store holds a prominent corner plot within the conservation area. It contributes to the mixture of high quality building profiles within the historic street scape and articulates Harrogate's development in the 19th and early 20th centuries as a fashionable destination, alongside many neighbouring designated buildings.

The building holds historical interest as an early department store – a building type that is becoming increasingly redundant and threatened by shifts in retail formats and consumer shopping habits. What was 'Buckley's', then 'Busby's' before becoming a branch of Debenhams

shows the evolution in high street shopping from the Arcade format, in the neighbouring Westminster Arcade. The legibility of this narrative enhances the building's contribution to the significance of the conservation area and the 19th – 20th century development of Harrogate town centre.

Comments

Impacts of the proposed demolition

The Busby's department store building in the corner plot of the application site is a non designated heritage asset that positively contributes to the character and appearance of the Harrogate Conservation Area. It also contributes to the built narrative of a boom period in the town's history and its historical development. Demolishing the Busby's buildings equates to total loss, or substantial harm in NPPF terms. Paragraph 103 of the NPPF requires this substantial level of harm to be weighed against the potential benefits of the proposed scheme. Whilst a new use is needed for this site, there is nothing presented that suggests a new building is necessary to achieve this. Alternative strategies for the site could vastly reduce the level of harm, through adapting the existing buildings to a new use. No justification is apparent for total demolition. Adaptive reuse strategies need to be explored and treated preferentially. Not only to reduce the harmful heritage impacts but also to minimise the enormous amount of embodied carbon that would be lost and wasted through the clearance of this site and construction of the proposed new build.

The construction industry is estimated to be responsible for approximately [40% of global carbon emissions](#), when both construction and the manufacturing of materials are taken into consideration. Therefore, in terms of sustainable development, the adaptive reuse of standing buildings far outweighs their demolition and rebuilding. What is more, the mindset that old buildings are inefficient in terms of energy usage focuses on the daily emissions created by heating and powering a building, overlooking the carbon embodied within the building and the carbon lost through demolition. The buildings on site already embody significant CO₂ emissions in their materials. The fact that the Busby's building has been standing for 120 years supports the truism 'The greenest building is one that's already built'.

A key tenet of a sustainable built environment is effectively extending the useful life of existing buildings by improving them, because the CO₂ emissions already embodied within existing buildings would not be lost through demolition. There are also many ways to reduce the daily emissions in historic building stock through retrofitting.

A guiding principle in national planning policy is sustainability. Paragraph 152 of the NPPF states that *"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."* As Harrogate Borough Council declared a climate emergency in 2019, with a target of net zero emissions by 2038, the adaptive reuse of existing buildings should be a priority.

Impacts of the proposed building

The tower and spire of Westminster Arcade is a prominent decorative feature within long range views along Parliament Street, which contribute to the character and appearance of the Harrogate Conservation Area. The architectural interest of Westminster Arcade continues up the decorative street façade to an articulated roofscape that entices visitors to the arcade from long and short range views. The increased height and massing of the proposed structure would dominate this neighbouring Grade II building in a way that would dwarf the listed building and obscure it from view. It would harmfully impact the listed building's setting, the significance of its intentional prominence on Parliament Street and its contribution to the character and appearance of the conservation area. Elevational drawings show the mansard roof to be the same height as the arcade's spire. The increase in height from the current 4 storied 1960s building to 6 stories would result in the finely detailed and highly attractive listed shopping arcade, which is currently prominent within the street scape and at roof level, being masked from views on approach from the south and lost against the solid mass of the proposed building from the north. Its dominating impact would be exacerbated by the gradient of the street. The dominance of the proposed building in height and width would harm the character and appearance of the conservation area. This is contrary to section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that special regard is paid to *"the desirability of preserving or enhancing the character or appearance of conservation areas."*

Alternative approaches to reusing the site

The CBA recognise that the site is redundant as a department store and that there is scope for the reuse of this site to improve the buildings' contribution to the character and appearance of the conservation area. Especially the northern 1960s building and its frontage onto Union Street. The benefit of not being designated buildings means the potential to make changes to the buildings on site is increased.

The imperative presented by the climate crisis to reduce our carbon emissions means it is time to leave the 20th century approach of razing a site clear to build from scratch behind us. Throughout history we have adapted old buildings to meet new requirements. This is the way forward and should be coupled with innovative, imaginative and creative approaches to adapting standing structures. Arguably, the Union Street elevation of the 1960s building is a blank canvas crying out for a creative architectural approach to add a contemporary layer of development to the character and interest of Harrogate and its ongoing development.

Recommendation

The CBA strongly object to this application for the unjustified substantial harm it would cause to a non-designated heritage asset. This is contrary to the requirements of NPPF paragraph 103. We also object to the harm that would be caused to the character and appearance of the conservation area, contrary to the requirements of section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990. On top of this, the CBA object to this application on environmental grounds for the unnecessary amount of carbon that would be both lost and produced through these proposals. This is contrary to local and national policies as well as internationally recognised imperatives. Reaching 2050 targets (or 2038 in Harrogate) to be carbon neutral depends on big

changes to current norms, which should include revised approaches to reusing buildings preferentially to demolition and rebuild options. When considering adaptive reuse of non-designated heritage assets the benefits are multiplied; it conserves a sense of place, its history and its evolving identity as well as building a more sustainable future.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Catherine Bell'.

Catherine Bell. MA (cons), ACIfA
Listed Buildings Caseworker for England

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in, **Arrangements for handling heritage applications – notification To Historic England and National Amenity Societies and the Secretary of state (England) direction 2021**.