

BUILT HERITAGE NOTE

2 - 4 Balmoral Road, Blackpool FY4 1HR

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1 INTRODUCTION

- 1.1 This Built Heritage Note has been researched and prepared by RPS, on behalf of Blackpool Pleasure Beach Limited Self Administered Pension Fund (the owner of the property), with regard to 2-4 Balmoral Road, Blackpool FY4 1HR.
- 1.2 2-4 Balmoral Road comprises a pair of originally semi-detached properties, now connected internally as part of a single office unit. The property is not designated as a listed building, nor is it located within a conservation area. The property has, however, been included by Blackpool Council on its Local List.
- 1.3 The Council has served notice to the property owner (dated 23 February 2022) that it has made an Article 4 Direction under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 201, as amended, which would apply to 2-4 Balmoral Road. The proposed Direction applies to locally listed buildings located outside of the local planning authority's conservation areas, removing certain permitted development rights including exterior painting or demolition.
- 1.4 The Council has stated that it will receive representations with regard to the proposed Direction, and this Built Heritage Note sets out the owner's technical objection to the proposed Article 4 Direction Order.
- 1.5 The assessment provided within this report includes an appraisal of the heritage significance of 2-4 Balmoral Road. It is the result of historic research, a site assessment from publicly accessible locations in the surrounding area, map studies and the application of professional judgement. This assessment also reviews the process by which the Local List was created and the advice and guidance which has been provided to property owners in relation to the local designation.
- 1.6 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than 3 years from the date of this report. All maps, plans and photographs are for illustrative purposes only.

2 PLANNING POLICY AND GUIDANCE

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)

- 2.1 Whilst this report is focused upon the proposed Article 4 Direction it is important to consider the existing planning context which already applies to the property as a non-designated heritage asset (for clarity, there is not a planning application relating to 2-4 Balmoral Road at present).
- 2.2 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.3 It defines a heritage asset as a: *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'*
- 2.4 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are *'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'*.
- 2.5 For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 195, which requires LPAs to take this assessment into account when considering applications.
- 2.6 Paragraph 203 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

National Guidance

Planning Practice Guidance (DCLG)

- 2.7 The Planning Practice Guidance (PPG) has been adopted to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.8 Non-designated heritage assets are defined as follows:
Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.
- 2.9 The guidance further states that:
A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.
- 2.10 The PPG provides additional guidance as to how the significance of heritage assets is determined through various heritage interests, as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Overview: Historic Environment Good Practice Advice in Planning

- 2.11 Historic England has published a series of documents to advise applicants, owners, decision-takers and other stakeholders on managing change within the historic environment. These include Historic Environment Good Practice Advice in Planning (GPAs) documents and Historic England Advice Notes (HEANS).

HEAN 7: Local Heritage Listing: Identifying and Conserving Local Heritage (Second Edition, 2021)

- 2.12 This Historic England Advice Note provides information on local heritage listing of heritage assets such as buildings, monuments, sites, places, areas or parks, gardens and other designed landscapes, to assist community groups, owners, applicants, local authorities, planning and other consultants.
- 2.13 The guidance provides information on the recommended process for establishing a local list and the process for assessing candidate assets which may be added to that list. It provides some commonly used criteria by which potential assets are assessed. Whilst criteria will be determined locally, the guidance makes clear that to qualify for local heritage listing nominated assets will need to meet the requirements of the selection criteria, and national planning policy.
- 2.14 The guidance additionally provides best practice guidance for the publishing of information about local lists, including the reasons for which buildings or structures have been included.

Local Planning Policy

- 2.15 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

Blackpool Local Plan Part 1: Core Strategy 2012-2027 (Adopted January 2016)

- 2.16 Policy CS8: Heritage
1. Development proposals will be supported which respect and draw inspiration from Blackpool's built, social and cultural heritage, complementing its rich history with new development to widen its appeal to residents and visitors.
 2. Proposals will be supported that:

- a. Retain, reuse or convert, whilst conserving and enhancing the significance of designated and non-designated heritage assets and their setting.
 - b. Enhance the setting and views of heritage assets through appropriate design and layout of new development and design of public realm
 - c. Strengthen the existing townscape character created by historic buildings
3. Developers must demonstrate how any development affecting heritage assets (including conservation areas) will conserve and enhance the asset, its significance and its setting.

Local Guidance

List of Buildings of Local Architectural and/or Historic Interest in Blackpool (Local List), Guidance on Repairs and Alterations (June 2018)

2.17 This guidance includes the detailed criteria by which candidate buildings and structures are assessed before being added to the Local List. These criteria include:

- Age

(a) Buildings surviving from the earliest phases of development (in Blackpool's case prior to 20th century) and early 20th suburban development, and surviving in anything like their original form. Superficial alterations which may be reversed in the future, e.g. reinstatement of timber windows, will not preclude inclusion on the list.

- Rarity

(a) Rare surviving examples of a particular type or form of building, material or style.

- Aesthetic or design merit

(a) Examples of a particular architectural style.

(b) Use of quality materials and workmanship.

(c) The work of a notable local architect

- Group value

(a) Groups which as a whole have a unified architectural or historic value to the local area.

(b) Terraces, enclosing buildings (surrounding squares etc.), uniform rows etc.

- Archaeological interest

(a) Although archaeological finds across the borough to date have been scattered and few, they nevertheless indicate ancient settlements, and the possibility of future accidental finds should not be discounted. In addition, there is the possibility that some existing buildings have older foundations, perhaps as yet undiscovered. Where the presence of such archaeology is known, or suspected, to exist, the building will be included on the list. In all other cases, where planning applications for development in any part of the borough involve work below ground level, it is suggested that a condition be attached that archaeological finds should be notified to the Council for recording in situ, so the location can be added to the Heritage Environment Record.

- Historical interest

(a) Historical association with a notable local person, event or key period of development.

(b) Figures or events of national interest with a direct association

(c) Where buildings have later alterations, if the change demonstrates key stages in the town's historical development and are clearly legible, the building will be included

- Landmark status

(a) Buildings which contribute significantly to townscape appearance e.g. pubs, churches, factories, cinemas, banks, etc.

(b) Buildings that are a focal point of social or visual interest e.g. prominent corner sites.

(c) Form a landmark, from within or from outside an area.

- Social value

(a) The development of an area is often influenced by an individual building, which may play an integral part in the shape of the area, or in the local social scene. Such buildings may include churches, schools, village and town halls, chapels, public houses, memorials, places of employment and workhouses, which formed a focal point or key social role in the historical development of the area.

- Documentation

(a) The significance of a local historic asset of any kind may be enhanced by a significant contemporary or historic record, although this criterion alone will probably not be sufficient to justify local listing.

2.18 The guidance provides detailed advice for property owners regarding works to locally listed buildings, including maintenance and repairs. The advice is comprehensive and accessible for property owners, allowing them to make decisions that preserves the significance of their properties as locally listed buildings.

3 HISTORIC BUILT ENVIRONMENT APPRAISAL

Historic Development

- 3.1 Balmoral Road is shown laid out on the 1891 OS map (Figure 1), with 2-4 Balmoral Road extant as a pair of semi-detached properties at the western end of the street. The street is otherwise largely undeveloped, mirroring the disjointed pattern of development along roads to the north at Osborne Road and Withnell Road. At this stage Simpson Street to the immediate west of 2-4 Balmoral marks the edge of the seafront. To the south of Balmoral Street the land remains undeveloped, crossed by the Kirkham, Lytham and Blackpool Coast Line.
- 3.2 The 1911 OS map (Figure 2) shows a dramatic acceleration of development across Balmoral Road and the surrounding area. Previously empty plots along the adjacent streets have been almost entirely filled in, leaving only the plot of land immediately surrounding 2-4 Balmoral Road undeveloped. Another major change is the embankment laid out to the west of Balmoral Road and creation of the Promenade, along with the South Pier.
- 3.3 Whilst the existing residential streets remained broadly unchanged, the 1932 OS map (Figure 3) shows significant development relating to the seaside resort facilities, including the open air swimming bath to the west and the Pleasure Beach to the south. A 'casino' is shown to the south of Balmoral Road, which was the main entrance building to the Pleasure Beach (and although called 'casino', we understand it was not actually an operating casino). To the east of the railway line new residential streets have been laid out and developed.
- 3.4 The 1938 OS map (Figure 4) shows the 'casino' building which survives to the present day now extant to the south of Balmoral Road, replacing the earlier casino building in this location.
- 3.5 The 1962 OS map (Figure 5) shows the land surrounding 2-4 Balmoral Road labelled as a car park for the first time.
- 3.6 The 1993 National Grid map (Figure 6) shows the Gables Hotel now extant to the east of 2-4 Balmoral Road. Properties to the south of Balmoral Road have also been demolished by this time, replaced by a large car park.
- 3.7 From this time, up until the present day (2022 Aerial Photograph, Figure 7), the immediate surroundings of 2-4 Balmoral Road have remained broadly unchanged, aside from the redevelopment of the Gables Hotel as a Travelodge. At the other end of the street, 30 Balmoral Road (which also was shown extant on the 1891 OS map) has been demolished to make way for a car park.

Site Assessment

- 3.8 2-4 Balmoral Road was originally built as two residential properties but in the present day the building exists in office use and is connected internally. Photographs are provided in Appendix B.
- 3.9 An understanding of the local area suggests that this part of the South Beach area was known for larger, middle class lodging houses, particularly after the development of the Pleasure Beach. It is known that 2-4 Balmoral Road were used as a school for young ladies in the 1890s.
- 3.10 The overall building comprises a pair of semi-detached properties, two storeys in height with attic storey. Each property has two bays, with two storey canted bay windows to the outer bays and front entrances contained within the inner bays which are approached via a short flight of steps. The walls are rendered, with stone dressings to the windows and door as well as quoins. The render obscures the original red brick walls, which are shown on 1940s aerial photographs as having originally existed unrendered with bands of stone. The gabled roof is slate covered, with shallow gabled dormers to the front elevation. The windows are all double glazed units. To the rear is a modern, two storey extension.

- 3.11 The property is bounded on Balmoral Road by a low brick wall with stone coping and gate posts. The property is overshadowed to the east by the Travelodge and to the south by the buildings of the Pleasure Beach and The Sandcastle to the west.

2 - 4 Balmoral Road, Assessment of Significance

- 3.12 2-4 Balmoral Road is not statutorily listed or located within a conservation area, but it has been identified by Blackpool Council as a locally listed building. Whilst the assessment criteria are available online, the exact reasons for why this particular property is locally listed do not appear to be publicly available (as is recommended as best practice by Historic England). It is therefore not possible to assess whether the reasons for which 2-4 Balmoral Road was originally included on the Local List remain applicable. It is important, however, to reference guidance in the PPG which makes clear that it is necessary to be selective about which properties or structures are regarded as non-designated heritage assets, stating that *'only a minority have enough heritage significance to merit identification as non-designated heritage assets'*.
- 3.13 The following assessment presents a standalone assessment of significance for 2-4 Balmoral Road, as the basis from which to determine whether the withdrawal of permitted development rights, as proposed by the Article 4 Direction, represents an appropriate level of planning control in this particular case.
- 3.14 The historic overview of 2-4 Balmoral Road (paragraphs 3.1 - 3.7) reveals that the property is a fragmentary element of the late nineteenth century townscape of the South Beach area. The property was never fully integrated with the rest of the residential street and has always been isolated and surrounded by undeveloped land, which now exists as a car park. It is an aesthetically poor townscape arrangement.
- 3.15 In its design, 2-4 Balmoral Road is very much typical of many late nineteenth century properties in the surrounding area. However, the rendered exterior, presumably applied during the second half of the twentieth century, has now obscured much of the building's original detailing. Aerial photographs from the 1940s indicate that the building had exposed red brick walls with bands of stone running along the side elevations (www.britainfromabove.org.uk, Reference: EAW020134, 18 October 1948). The present day appearance of the building would therefore appear to be a poor and muted representation of its original and intended appearance.
- 3.16 A very similar pair of contemporary semi-detached properties (which are not locally listed) are found at the eastern end of Balmoral Road, one of which is better preserved and retains its unrendered red brick masonry. The apparent distinction of 2-4 Balmoral Road against these other examples appears to relate to its more prominent position, although as highlighted above, this is not a particularly successful townscape arrangement and serves to emphasise the starkness of the rendered side and rear elevations.
- 3.17 In 2001 2-4 Balmoral Road was the subject of an appeal (APP/J2373/C/01/1067479), further to refusal of a retrospective planning application for a rear extension. Whilst the appeal was dismissed planning permission was later granted for an amended design and the extension was altered and retained. In his appeal decision, the Inspector noted that 2-4 Balmoral Road was "much more restrained visually than some of the hotel/guest house development forming the backcloth to the promenade". This would be an accurate assessment of the building's limited architectural merits.
- 3.18 With reference to the Council's published criteria by which buildings or structures are added to the Local List, it seems that 2-4 Balmoral Road has some interest for its age as one of the earlier properties to be built on Balmoral Road. It does not, however, display any signs of rarity and would appear to be a fairly typical example of a building from this period of late nineteenth century development, and not a particularly well preserved example in this regard. The external rendering has impacted upon any original architectural interest the building may have possessed and so it is not considered that the building is a strong candidate on aesthetic or design grounds. Its isolated position on the street would also appear to preclude any group value, although there is some limited

interest alongside the listed casino to the south, showing the time depth of development in this location. There is a limited degree of social and historic interest relating to the building's use for a time as a school. The building is something of a focal point, given its isolated position at the end of the road, surrounded by an open area of car parking, but it is not considered that this prominence amounts to interest as a landmark building, particularly within the local context where there are a great many focal points along the seafront. In summary, it is considered that the building's principal interest as a locally listed building lies in its age as one of the earlier buildings to be constructed along the area's residential streets. It is, however, arguably to be questioned whether this interest is sufficient to explain its inclusion on the list.

- 3.19 Paragraph 189 of the NPPF makes clear that heritage assets '*should be conserved in a manner appropriate to their significance*'. Whilst there is some doubt as to whether 2-4 Balmoral Road should be included on the Local List, it is considered that the property's limited and local degree of interest is already addressed via the local listing designation. It is considered that the planning framework provided by the NPPF, existing local planning policies and Council adopted guidance for locally listed buildings (all of which are outlined in Section 2), together provide an appropriate and proportionate framework within which the property's limited and local degree of heritage significance can be managed. Any limitations on permitted developments rights are considered to represent an inappropriate level of planning control for this particular building, given its demonstrably limited heritage value.

Local List Procedure

- 3.20 2-4 Balmoral Road was added to the Local List in 2013, at which point the Local List was first adopted by the Council. The minutes from the Planning Committee, (5pm, 11 March, 2013) record that during the meeting it was made clear by the presenting officer in Agenda Item 4 that:

an approved list would not remove permitted development rights from property owners, but it would allow the Committee to consider the local list as a grounds for refusal or deferral of applications.

- 3.21 The Council's current and revised position with regard to the proposed Article 4 Direction would appear to fly in the face of those original comments, upon which the Planning Committee based their decision to adopt the list. It is also not clear whether property owners were made aware during the original Local List public consultation that the introduction of an Article 4 Direction could have been a future possibility.

- 3.22 The Council's previous position, that inclusion on the Local List would not affect permitted development rights, appears to have been maintained as recently as November 2018 when guidance for locally listed buildings was adopted. The Report to the Planning Committee proposing adoption of the Guidance on the Alteration and Repair of Local Buildings for the meeting dated 13 November 2018 made clear the following:

5.4 The control of works on a locally listed building or structure is more limited than for listed buildings, with protection managed through the normal planning process. Inclusion on the Local List is not primarily intended to restrict development, but will seek to ensure that any proposals take into consideration the local significance of the building. The only real implication, therefore, of including a building or structure on the Local List is that it will change the level of consideration given by the Council to preserving a building's character and appearance when planning proposals are assessed.

- 3.23 The minutes of the meeting (Tuesday, 13 November 2018) note that this point was specifically reiterated by the presenting officer to the Planning Committee under Agenda Item 5, who explained that:

the intention was not to restrict development but to provide a guide in setting parameters for the development of locally listed buildings.

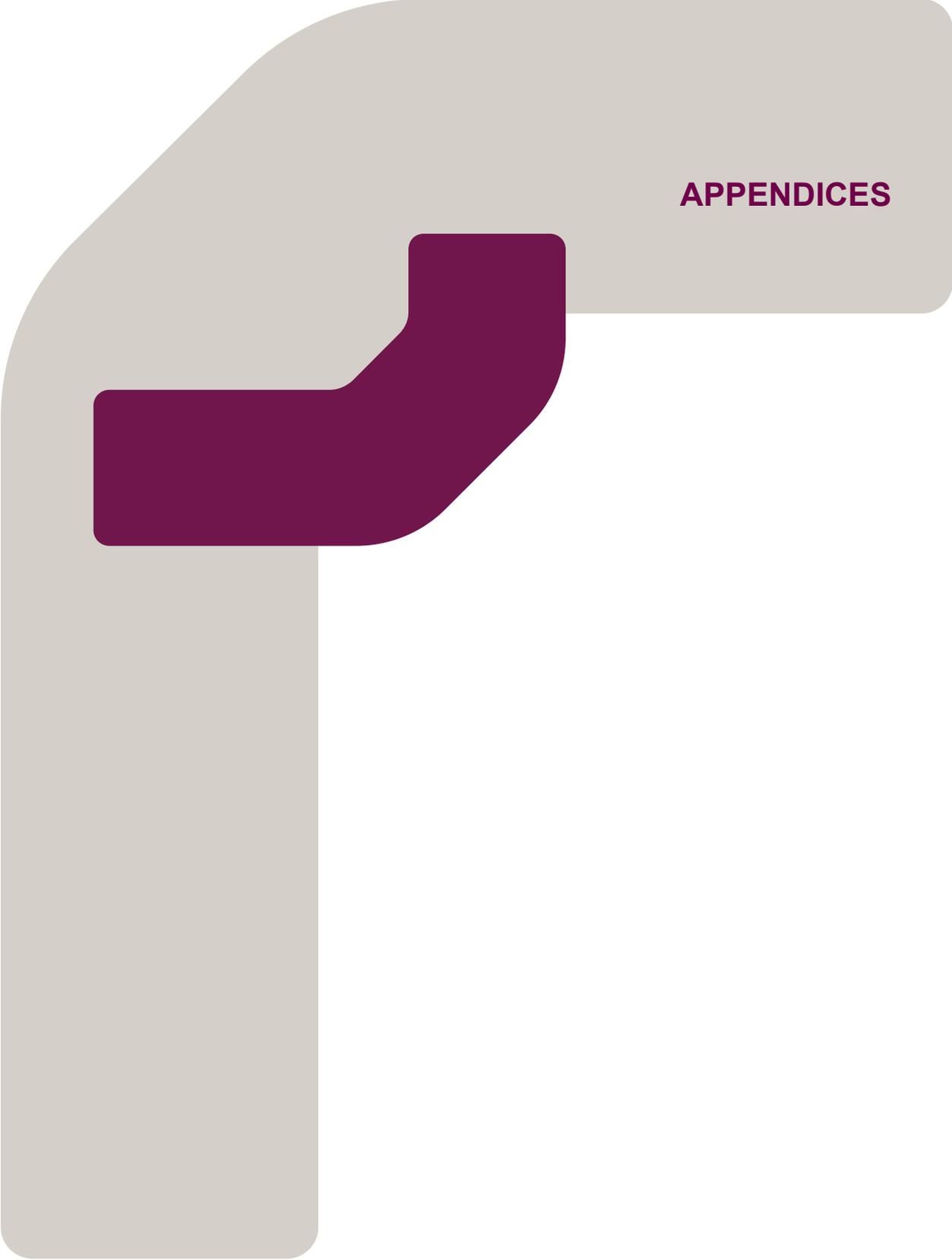
- 3.24 This position is maintained within the Guidance document itself, directed at property owners:

6.1 Your permitted development rights are not affected by local listing.

- 3.25 It would therefore appear that the Council's current intentions to introduce an Article 4 Direction represent an abrupt *volte face* to its previous position and the position on which both the Local List was originally adopted in 2012 and its guidance for property owners adopted in 2018. In addition to this, Article 4 Directions have long been available as a planning tool for the Council and so it would appear to be a complete omission that property owners were not advised that this could be a possible consequence of being added to the Local List.
- 3.26 On these grounds it is considered that the new intention to introduce an Article 4 Direction for locally listed buildings represents an unfair imposition for property owners and that, at the very least, further public consultation should be undertaken so that owners are fully informed and allowed to express their opinions.

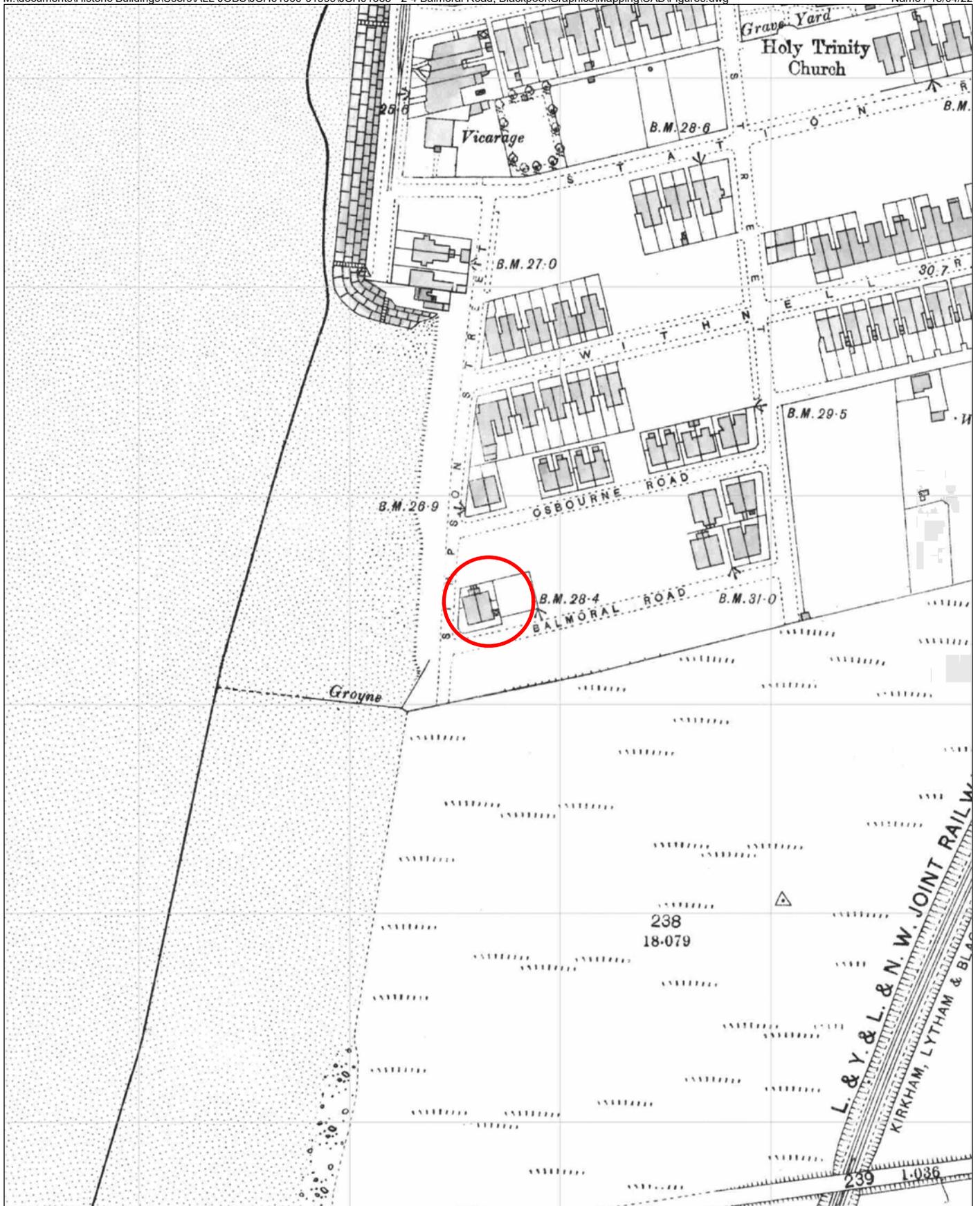
4 CONCLUSION

- 4.1 This Built Heritage Note has been researched and prepared by RPS, on behalf of Blackpool Pleasure Beach Limited Self Administered Pension Fund, with regard to 2-4 Balmoral Road, Blackpool FY4 1HR. It comprises an objection on behalf of the property owners in relation to the proposed introduction of an Article 4 Direction which would apply to 2-4 Balmoral Road and restrict its permitted development rights relating to demolition or exterior painting.
- 4.2 It has been demonstrated in this report that 2-4 Balmoral Road represents a fragmentary element of the late nineteenth century townscape of the South Beach area. The property was never fully integrated with the rest of the residential street and is surrounded in the present day by a car park as part of an aesthetically poor townscape arrangement.
- 4.3 In design, 2-4 Balmoral Road is very much typical of many late nineteenth century properties in the surrounding area and is arguably not even the best example of this type. Its exterior appearance has been negatively affected by the introduction of render, which obscures the original interest of the building's design with regard to its brick walls and bands of stone. Whilst the building has some local interest as one of the earlier properties to be built along Balmoral Road, this interest is limited given the later alterations to the building's exterior.
- 4.4 It is considered that the principal interest of 2-4 Balmoral Road as a locally listed building lies in its age as one of the earlier buildings to be constructed along the area's residential streets in the South Beach area. It is, however, arguably to be questioned whether this interest is sufficient to explain its inclusion on the list.
- 4.5 Paragraph 189 of the NPPF makes clear that heritage assets '*should be conserved in a manner appropriate to their significance*'. On this basis, the limited and local degree of interest associated with 2-4 Balmoral Road is considered to be already addressed via the local listing designation. It is considered that the planning framework provided by the NPPF, existing local planning policies and Council adopted guidance for locally listed buildings, together provide an appropriate and proportionate framework within which the property's limited and local degree of heritage significance can be managed. Any limitations on permitted developments rights are considered to represent an inappropriate level of planning control for this particular building, given its demonstrably limited heritage value.
- 4.6 In addition to the above assessment of whether an Article 4 Direction is appropriate in light of the limited degree of significance for 2-4 Balmoral Road, it is considered that the process by which the Article 4 Direction has been introduced is flawed and has been misleading and unfair for property owners. Since the adoption of the Local List in 2013 (and reiterated in guidance from 2018) the Council has assured property owners that inclusion on the list would not lead to additional planning obligations. It is considered that to do so now without full justification or more detailed public consultation is fully inappropriate.



APPENDICES

Appendix A Historic Maps



 Site Location

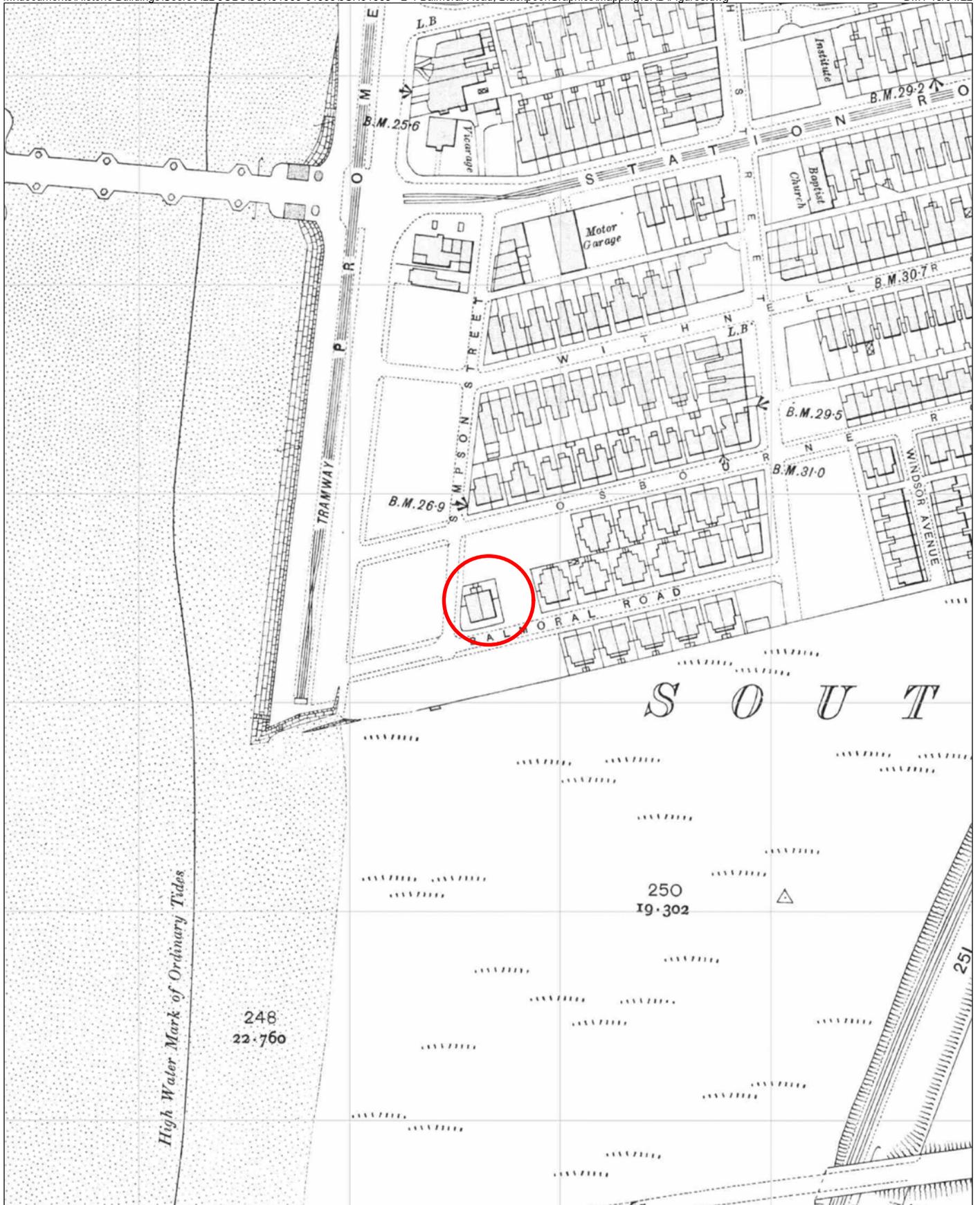


0 25 50m
Scale at A4: 1:2,500



Figure 1

Map date: 1891



 Site Location

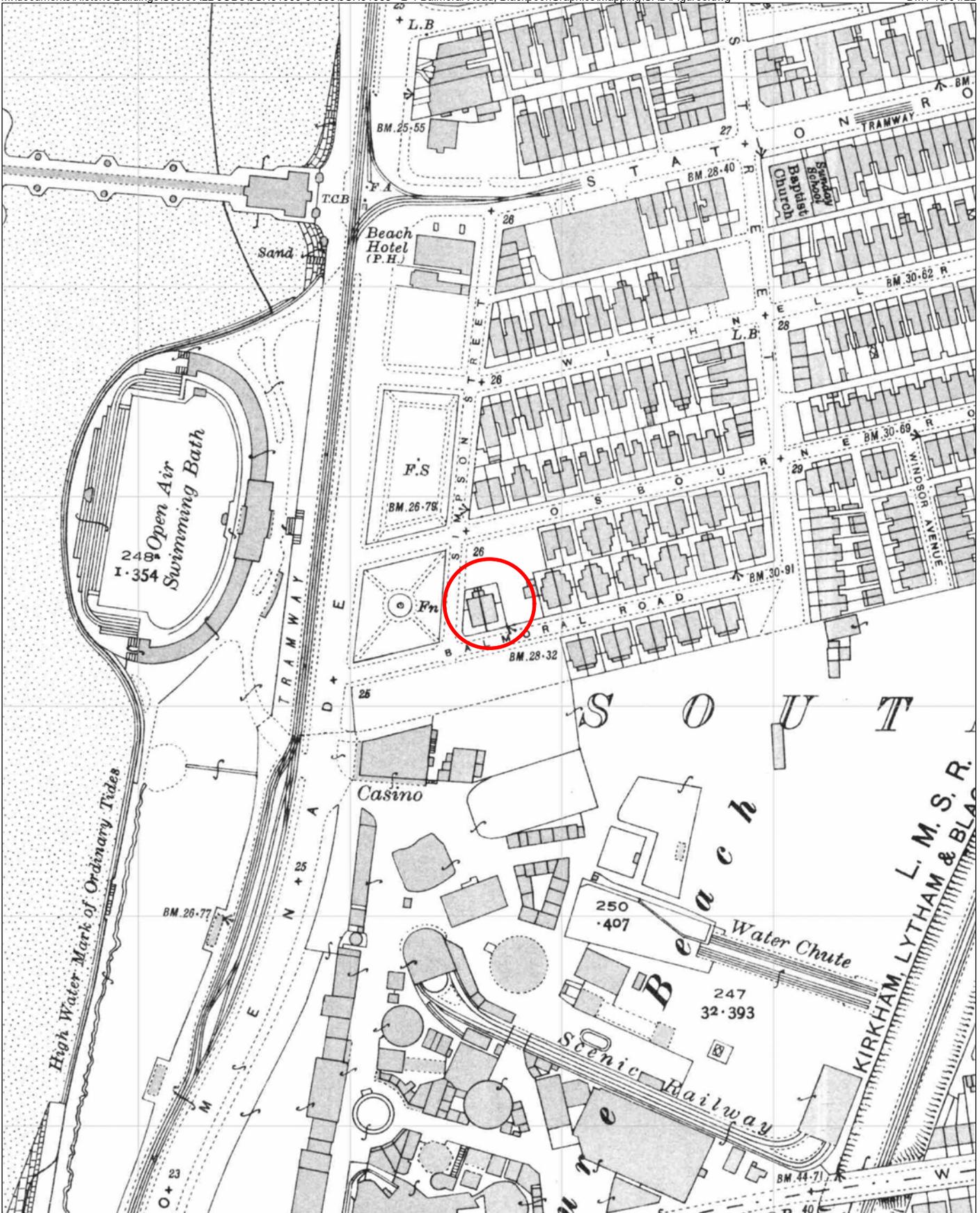


0 25 50m
Scale at A4: 1:2,500



Figure 2

Map date: 1911



Site Location

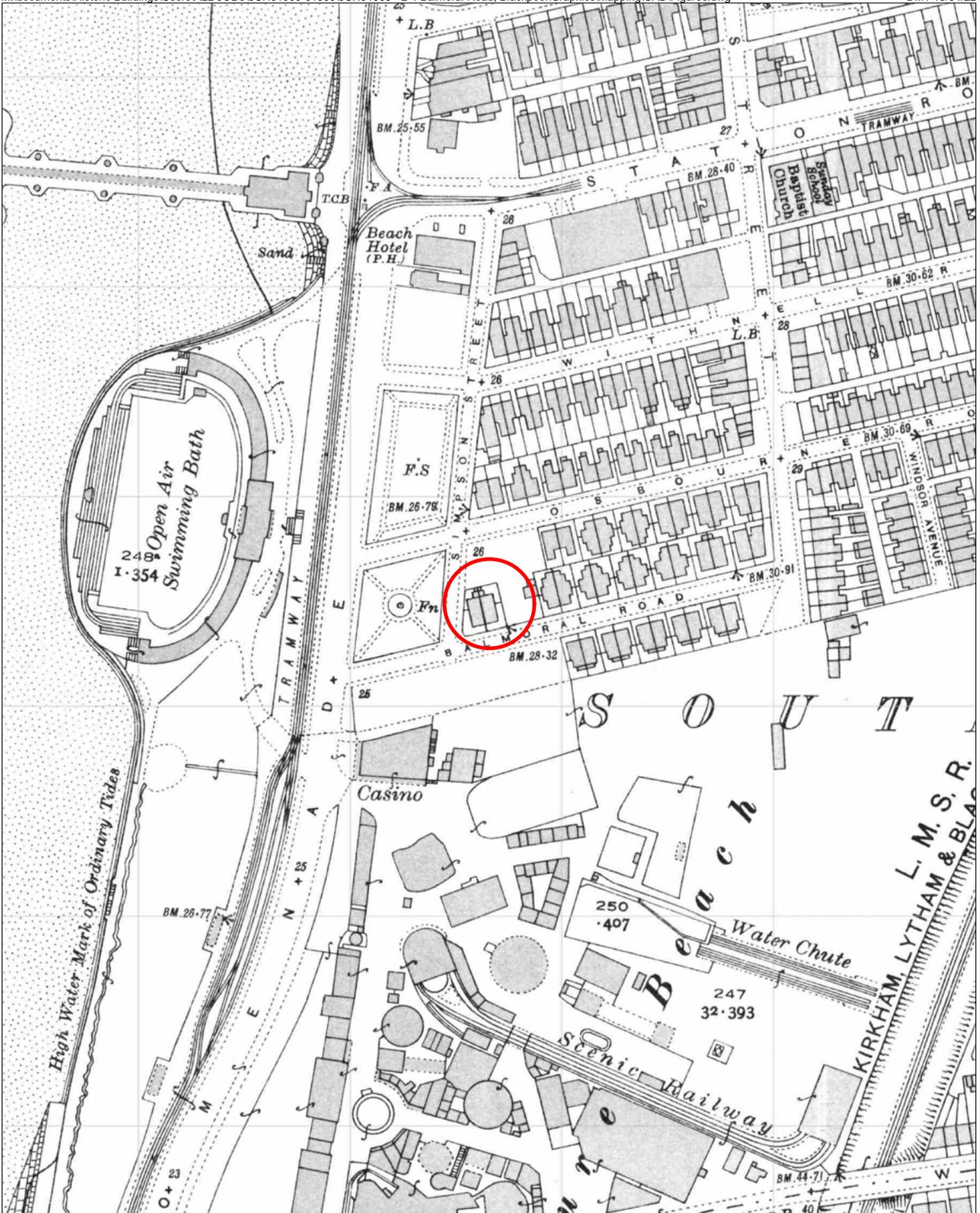


0 25 50m
Scale at A4: 1:2,500



Figure 3

Map date: 1932



Site Location

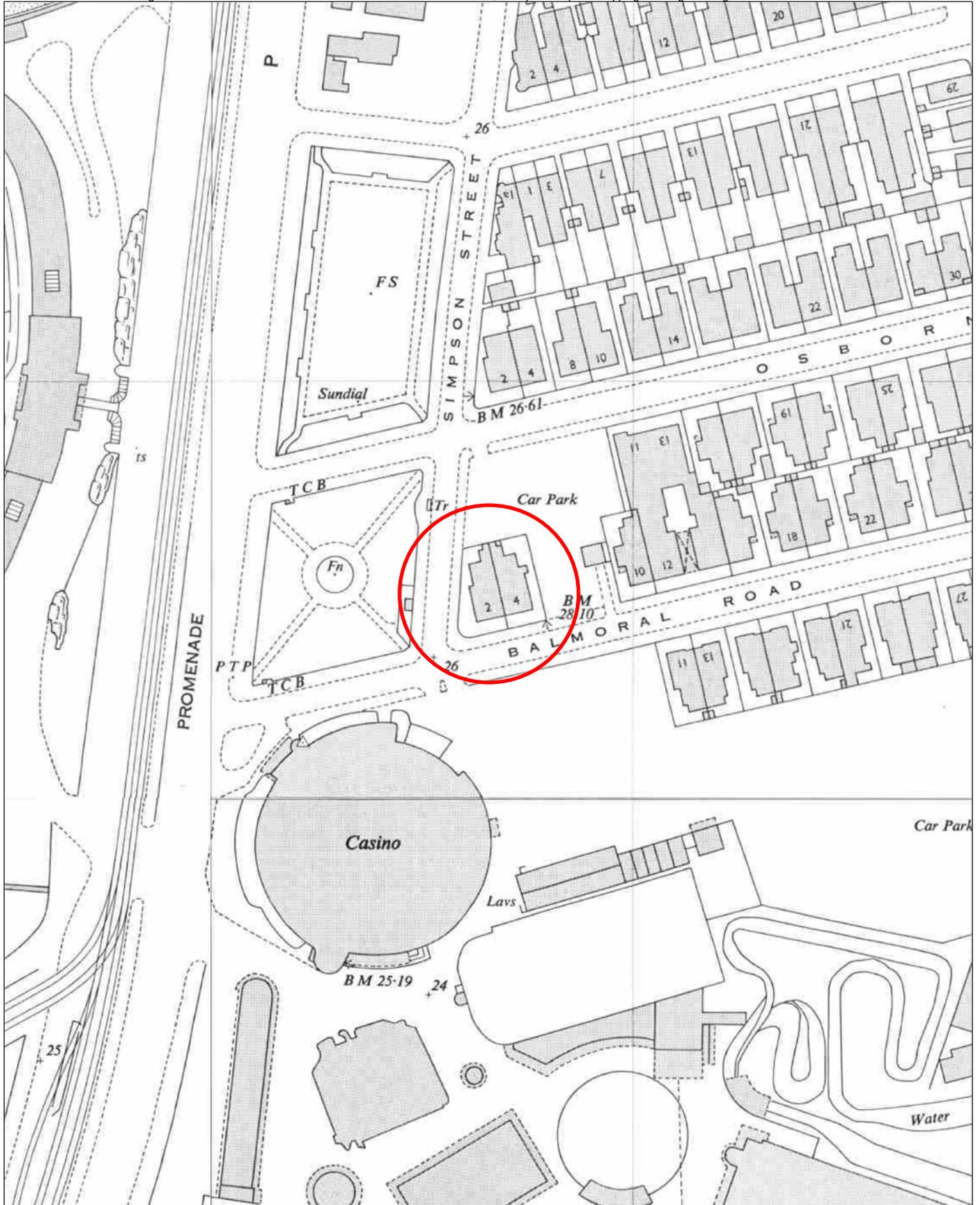


0 25 50m
Scale at A4: 1:2,500



Figure 4

Map date: 1938



 Site Location

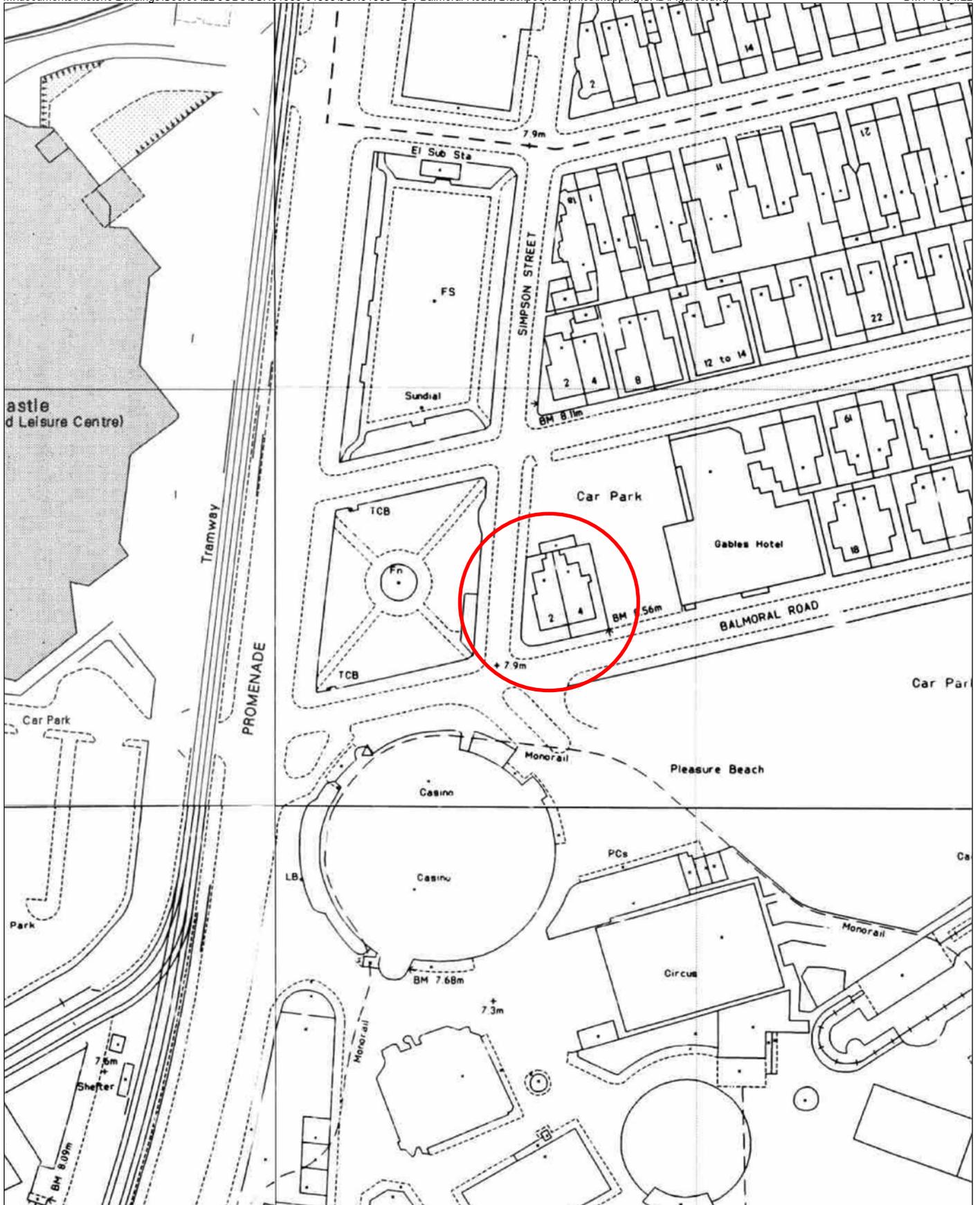


0 10 20m
Scale at A4: 1:1,250



Figure 5

Map date: 1962



 Site Location



0 10 20m
Scale at A4: 1:1,250



Figure 6

Map date: 1993



 Site Location



Do Not Scale



Figure 7

Aerial photo 2022

Appendix B Photographs



Figure 8: Front elevation, facing Balmoral Road



Figure 9: Wider context of 2-4 Balmoral Road, showing the Pleasure Beach and car park to the south, with The Sandcastle in the distance and the Travelodge to the left of the image.



Figure 10: View from Simpson Road, showing 2-4 Balmoral Road with modern extension to the rear and enclosed by car park (Google Streetview).



Figure 11: East facing elevation, with external staircase structure.



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