

John Macholc
Building and Development Control
Manager
Ribble Valley Borough Council
Council Offices
Church Walk
CLITHEROE
BB7 2RA

Phone: (01772) 531734
Fax:
Email: douglas.moir@lancashire.gov.uk
Your ref:
Our ref: ASM/ASP/DM
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F.A.O Adrian Dowd

Dear Mr Macholc

PROPOSED: Barn 2 (non listed building) to be converted into a four bedroom dwelling involving the removal of the more recent addition to the barn and restoration of various elements to restore its former character. Barn 1 (listed building) to be converted to a two bedroom dwelling. Greengore Farm, Hill Lane, Hurst Green (3/2012/0589 & 0590)

Barn 1 is a designated heritage asset, a grade II Listed Building (Lancashire Historic Environment Record PRN 17610), latterly a cottage but formerly an agricultural building, thought to date to the 17th century.

A building of a similar shape and size as Barn 2 is shown on the 1st Edition Ordnance Survey (Lancashire Sheet 54) surveyed in 1844. Consequently the building is considered to be of some historical interest, probably dating to the first half of the 19th century. The period 1750-1880 has been recognised as the most important period of farm building development in England.

The two buildings lie to the north and south respectively of Greengore, another designated heritage asset, a grade II* Listed Building (PRN 2885), thought to date to c. 1600 and reputedly once a shooting box of Henry VI.

National Planning Policy Framework is clear that where proposals which affect heritage assets (both designated and non-designated) the applicant must "describe the significance of any heritage assets affected" (section 128) and "identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)" [section 129]. Such an assessment is usually provided in the form of a Heritage Statement. PPS5 Planning Practice Guide (which was not cancelled in March 2012 and is still valid) sections 181-192 make it clear that the importance of a building does not just lie in its appearance but

also encompasses other elements such as plan form, historic sub-division, position of original openings and construction details. The Statement that accompanies the current application for planning permission and listed building consent does not adequately meet the requirements of NPPF as it fails to identify areas of significance or deal with any of the aforementioned elements of interest, and is simply a description of the proposals.

Consequently LCAS is of the opinion that the Borough Council remains unable to determine the impact of the current proposals, and cannot currently meet the requirements of NPPF section 132 "As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to...a grade II listed building, park or garden should be exceptional" and Saved Local Plan Policy ENV20 "Proposals for the alteration or repair of listed buildings should be sympathetic to their character and appearance. The most important features of any listed building will be preserved."

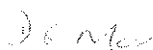
LCAS would therefore recommend that the Borough Council does not determine the current applications but rather that the applicant be requested to submit an amended Heritage Statement which addresses the requirements of NPPF sections 128 & 129. The applicant may wish to consider the use of a professional buildings archaeologist for this purpose.

If however the Borough Council considers that the above approach is unreasonable, or that other circumstances make such an approach unfeasible, then I would request that LCAS is contacted in writing outlining the Borough Council's position, with a request for any further comments that LCAS would wish to make, in particular with regard to any conditioned works (such as building recording) needed to meet the requirements of NPPF para. 141:

"Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible."

Please note that the above comments have been made without the benefit of a site visit. If you have any questions or require any further information please do not hesitate to contact me.

Yours sincerely



Doug Moir
Planning Officer (Archaeology)