



John Macholc
Head of Planning Services
Ribble Valley Borough Council
Council Offices
Church Walk
CLITHEROE
BB7 2RA

Phone: 07847 200073

Email: Lancashire.archaeology@gmail.com

Your ref: 3/2016/1185

Date: 19th January 2017

FAO R Major

Dear Mr Macholc,

Planning Application 3/2016/1185: Outline planning application with all matters reserved except access, for demolition of existing structures and construction of up to 50 dwellings (Class C3), with associated parking and landscaping; Former Clitheroe Hospital, Chatburn Road, Clitheroe BB7 4JX

Thank you for your consultation on the above application. We are aware of the responses sent to the Council by the former Lancashire County Archaeological Service and The Victorian Society regarding applications 3/2008/0870 and 3/2012/0785 for the same site and have considered both the Heritage Statement and Planning Statement supplied with the present application.

Both of the Statements note that the proposed demolition runs contrary to the Council's policy (Key Statement EN5 and Policy DME4) and both agree that the impact on the heritage assets that make up the former workhouse and its associated infirmary are substantial and negative (e.g. Planning Statement 5.43 and 5.45). We would also point out that ancillary structures of the same date, such as the porter's lodge and mortuary (Heritage Statement section 5.2.4), should not be casually dismissed as 'of minimal interest' but should be considered as component elements of the complex and that whilst individually of lesser significance add to the value of the whole.

It is also suggested that the consideration of Communal Value in the complex has been rather downplayed in the Heritage Statement (Section 5.2.6). Historically a workhouse has been seen as a very negative place, but with the passing of time and with the modern interest in family history this is no longer the case. Indeed the fact that records were kept in such sites may mean that research may be aided. Equally a hospital is often the site of particularly important moments in people's lives and will have more significance to local people than other publicly accessible buildings of 'grander' appearance such as, say, a Bank.

We note that much is made of the decision by Historic England not to List the main buildings but would suggest that two of the four reasons given for the refusal are capable of significant remediation:

- *The addition of somewhat brutal lift shafts to both of the main buildings has significantly compromised the aesthetic appeal of the respective elevations of these buildings, whilst other additions to the rear of the former workhouse have further compromised its original plan.*
- *Demolition of some original buildings and the construction of modern health care buildings and link corridors has significantly altered the original layout of the workhouse complex. (Historic England Listing File 1435994 3rd December 2008 - http://www.pastscape.org.uk/hob.aspx?hob_id=1435994)*

In particular it would be possible for the extant lift shafts and modern additions to be cleared away and more modern and architecturally sensitive alternatives provided where necessary. It could also be argued that the fact that the buildings are executed in a 'relatively modest architectural style' should not be a hindrance to their Listing – selecting only those examples with particularly ornate architecture would bias the List in favour of the extraordinary, rather than the typical (which is, unfortunately, often the case).

Taking the above points into account and using the tables provided in Appendix B of the Heritage Statement we would consider the group as a whole to be of Medium significance and, given the agreed Substantial Negative Impact proposed, the Significance of the Impact would be an Intermediate Adverse Effect rather than the Minor Adverse Effect noted in both statements. It is not considered that the suggested photographic recording would mitigate the impact sufficiently for it to be reduced to a Minor Adverse Effect. This would mean that the impact of the proposals on the heritage should be given more weight than that assumed in the Planning Statement and would justify the position already adopted by the Council with regard to applications 08/0878 and 12/0785, i.e. to refuse the former on the grounds of the loss of the historic asset and the approval of the latter where a scheme to retain and convert the asset is proposed.

On balance we would support the Council's existing stance and would therefore recommend that this application is **refused**.

Should the Council **not** be minded to follow this advice and to grant consent, then we would recommend that a more thorough building record be created than the simple photographic record suggested in the Heritage Statement (Section 7). We would recommend that a Level 3 Record, as set out in '*Understanding Historic Buildings*' (Historic England 2016) be created, although it should build on the existing reports and assessments rather than undertaking extensive new documentary research. This can be required by the use of a suitable planning condition, the following wording is suggested:

Condition: No development shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological building recording and analysis. This must be carried out in accordance with a written scheme of investigation, which shall first have been submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure and safeguard the recording and inspection of matters of archaeological/historical importance associated with the site.

Note: The programme of recording should comprise a Level 3 record, as set out in '*Understanding Historic Buildings*' (Historic England 2016). It should be undertaken by an appropriately experienced and qualified professional archaeological contractor to the standards and guidance set out by the Chartered Institute for Archaeologists.

Please note that the above comments have been made without the benefit of a site visit.

Yours sincerely

Peter Iles