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FAO R Major

Dear Mr Macholc,

Planning Application 3/2017/0616: Demolition of existing buildings and construction of up to 60 dwellings and associated infrastructure; 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and The Victorian Society regarding applications 3/2008/0870 and 3/2012/0785 for the same site, and our response to the withdrawn application 3/2016/1185. We have considered both the Heritage Statement and Planning Statement supplied with the present application. The Heritage Statement has been slightly updated since 2016, but does not appear to have considered our comments relating to the outbuildings or the assessment of Communal Value, so these are repeated below.

Both the Planning Statement and Heritage Statement 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 former workhouse and its associated infirmary are substantial and negative. Both, however, still dismiss a number of the historical ancillary buildings, such as the porter's lodge and mortuary (Heritage Statement section 5.2.4, 5.2.6 and Planning Statement 4.7) as 'of minimal architectural interest' and thus not worthy of consideration as heritage assets. This assessment does not consider their role in the functioning of the complex as a whole and that their survival reflects the 'completeness' of the site. Indeed it is notable that the 'gardener's store' is used in the consideration of the setting (Heritage Statement 5.2.5). It is considered that whilst individually these elements are of lesser significance than the main hospital and workhouse buildings, they add more heritage value to the site than they are credited with and should be considered as heritage assets. We would agree, however, that the modern additions such as the lift shafts, porches, etc. are of no heritage significance and, as noted by Historic England in their Listing assessment, that they detract from the heritage value of the site (but see below).

As noted previously, we are of the opinion that Communal Value in the complex has not been fully considered in the Heritage Statement. It is only mentioned, almost in passing, in Section 5.2.6. The social stigma previously associated with the occupants of workhouses has in the past resulted in these sites being ignored or downplayed, 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 family history and social research is considerably aided. Equally a hospital is often the site of particularly important moments in people's lives and will have much more significance to local people than other publicly accessible buildings of 'grander' appearance such as banks.

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)*

It would seem to be eminently possible for the present lift shafts and modern additions to be cleared away and more modern and architecturally sensitive alternatives provided where necessary. Selective demolition of such negative features to enhance the overall heritage significance is mentioned in the NPPG and no doubt the Council's conservation officer or Historic England could provide examples of this. 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.

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 tend to 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.

New viability information has apparently been provided as part of the application (noted in the Planning Statement sections 1.3 and 6.24). We have not accessed this and

cannot thus comment on its content or express an opinion on whether it is sufficient to justify the proposed demolition, given the increase in significance we discuss above. The Council may wish to obtain advice on this from, for example, Historic England.

If, on balance, the Council decides to grant consent to this application 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. 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.

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

Note: Relevant archaeological standards and lists of potential contractors can be found on the ClfA web pages: <http://www.archaeologists.net> and the BAJR Directory: <http://www.bajr.org/whoseWho/>.

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

Yours sincerely

Peter Iles