Sharon Craig

From: Sent: To: Subject: Robert Major 26 October 2017 11:39 Sharon Craig FW: 3/2017/0616: Clitheroe Union Workhouse, Chatburn Road, Clitheroe

From: James Hughes (The Victorian Society) [mailto:churches@victoriansociety.org.uk]
Sent: 22 August 2017 17:59
To: planning
Cc: Lucie Carayon (lucie.carayon@ancientmonumentssociety.org.uk); Adrian Dowd; suzannelilley@archaeologyuk.org
Subject: 3/2017/0616: Clitheroe Union Workhouse, Chatburn Road, Clitheroe

Dear Mr Major

RE: Clitheroe Union Workhouse, Chatburn Road, Clitheroe (Unlisted, J. J. Bradshaw, 1870-4); application for demolition of building and construction of up to 50 dwellings Our ref: 2017/02/007

Thank you for your notifying the Victorian Society of this proposal. As we did when consulted on a similar proposals both in 2008 and earlier this year, the Society strongly objects to this harmful and unjustified application and recommends that it is refused consent.

The Clitheroe Union Workhouse and Infirmary was constructed between 1870 and 1874 to the designs of *J. J. Bradshaw* of the distinguished local firm of *Bradshaw, Gass and Hope*. He conceived a handsome, dignified and attractively detailed complex of buildings that evidently possess considerable aesthetic and architectural merit. Its inclusion in the Lancashire: North volume of the Buildings of England series is indicative of its regional interest, an interest that was - despite its decision not to list - nonetheless acknowledged by English Heritage when it considered the building for statutory designation in 2008. The Council too has made its views clear on the importance of the building: it refused consent for the 2008 application on heritage grounds and asserted its desire to see the building preserved. This advice was, I understand, reiterated last year by the Council's Conservation Officer in pre-application advice. To assess the buildings as being merely of low significance (and the impact of their loss simply as 'minor adverse') suggests a fundamental misunderstanding of their historic and architectural interest, as well as the importance of their architect, and it is an assessment that is difficult to reconcile with the advice of other heritage bodies and that of the LPA's conservation team.

It is a core planning principle that heritage assets are conserved "*in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*". Paragraph 131 of the NPPF states that local planning authorities should take account of the "*desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*". It highlights also the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality. Paragraph 132 stresses that "*great weight*" should be given to the preservation of heritage assets. In addition, paragraph 135 of the NPPF states that "*the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application*". The demolition of the Workhouse and Infirmary buildings (as well as other structures correctly identified by the LAAS as being heritage assets, including the porter's lodge and mortuary) is therefore a material consideration in determining this application, one that the Council is obliged to take into account.

Paragraphs 58, 60 and 61 emphasise the need for new development to *"respond to local character and history, and reflect the identity of local surroundings and materials*", "to promote or reinforce local distinctiveness" and to *"address the connections between people and places and the integration of new development into the natural, built*

and historic environment". This can only be achieved by retaining those elements of the historic environment that contribute positively to the local area, its history and its sense of place.

National policy presumes in favour of sustainable development, which requires equal regard be paid to economic, social and environmental issues. The protection and sensitive management of the historic environment is a key part of the environmental aspect and, by proposing the loss of this locally significant complex of buildings, it is one this scheme neglects. This application does not, therefore, constitute sustainable development.

The fundamental strands of the NPPF are echoed and reinforced in the Council's local plan policies. In particular, 'Key Statement EN5: Heritage Assets' in the Core Strategy states that "there will be a presumption in favour of the conservation and enhancement of the significance of heritage assets and their settings. The Historic Environment and its Heritage Assets and their settings will be conserved and enhanced in a manner appropriate to their significance for their heritage value; their important contribution to local character, distinctiveness and sense of place; and to wider social, cultural and environmental benefits". 'Policy DME4: Protecting Heritage Assets' affirms that "in considering development proposals the council will make a presumption in favour of the conservation and enhancement of heritage assets and their settings", and that "alterations or extensions to listed buildings or buildings of local heritage interest, or development proposals on sites within their setting which cause harm to the significance of the heritage asset will not be supported".

The applicant asserts the lack of viability of retaining any of the historic structures, and refers to a viability assessment that has been carried out. It would be most helpful if we could be sent a copy of the assessment as without it we are unable to advise on this significant aspect of the Council's deliberations. Clearly the valuation of the site is an important factor in determining viability: its value should be calculated on the assumption that the most significant historic buildings are retained as part of any redevelopment.

Implementation of this scheme would result in the total and unjustified loss of significance of distinguished buildings of high local importance that could with relative ease be brought back into use. The substantial weight of national and local planning policy renders such a proposal entirely insupportable. We stand by our previous advice, and that of Ribble Valley Borough Council, in recommending that the application is refused consent.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely

James Hughes

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The Victorian Society is the national charity campaigning for the Victorian and Edwardian historic environment.

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