



5th April 2019

Our ref: SPAB/EB/2019/150573

Your ref: NC2/3/2019/0169

Adrian Dowd

planning@ribblevalley.gov.uk

Dear Mr Dowd,

Keys Cottage, 6 Main Street, Bolton by Bowland, BB7 4NW

Thank you for notifying the Society of the above named application for listed building consent. We note that the roof is in a poor state of repair and are supportive of the proposed efforts to repair the structure. However, we feel that the application, in its current form, fails to provide sufficient information to fully consider the proposed roof repairs.

Significance

The building is grade II listed and dates to the early 18th century. It was formerly one house but is now a pair of cottages. It is two storey and constructed of slobbered rubble with a stone slate roof. The Heritage Statement accompanying the application describes the building as a “well-known and much admired building” within the Bolton by Bowland area due to its significant and historic architectural features.

Historic Fabric

The application does not include any specific detail of the current condition of the roof fabric nor does it include a detailed description of the repair works proposed. The document entitled ‘Roof assessment’ contains a broad analysis of defects to the roof structure but highly recommends that a specialist timber survey is undertaken to determine the extent of damage to the roof. We note that this has not been carried out. Without this the application cannot be fully understood or considered. The final paragraph of this document briefly describes the repairs proposed but a Schedule of Works has not been submitted. It is clear that further information is necessary before consent can be granted or denied.

While the Heritage Statement says that “the repairs to the roof will not lead to the loss of any historic features and will respect the heritage asset”, this must be demonstrated by the inclusion of further documentation. Due to the short consultation period available to the SPAB we must perform a mostly desk based analysis of applications and the provision of sufficient documentation is most important so that we can make a considered judgment and provide a useful response.

Summary

The Planning (Listed Building & Conservation Areas) Act 1990 is clear in requiring LPAs to give 'special regard' to the special architectural and historic interest of listed buildings and in this case, due consideration must be given to impact of the proposals on the historic fabric of this listed building.

We refer to paragraphs 189 and 190 of the National Planning Policy Framework which require an applicant to “describe the significance of any heritage assets affected” and makes clear that the details of any report should be “sufficient to understand the potential impact of the proposal on their significance.” The application fails to meet these requirements and contains little information about the potential impact of that which is proposed.



Paragraph 194 of the NPPF states that 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'. Further information is required to demonstrate that the proposals are fully justified before approval can be given.

We hope that our comments are useful to you in determining the best way forward.

Yours sincerely,

Elaine Byrne BA MA GradDipCons(AA)
Temporary Casework Officer