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Your ref: 3/2022/0683 and 0684

Our ref: 3\_2022\_0683-0684-LCC

Date: 18<sup>th</sup> August 2022

FAO A Dowd

Dear Mr Macholc,

**Applications 3/2022/0683 and 0684: Reconfiguration and restoration of an existing listed property and work to an existing outbuilding within the curtilage to be used as an annex.**  
**Knott Gate, Townend, Slaidburn BB7 3EP**

Thank you for your consultations on the proposed works to these Listed and curtilage-listed buildings.

The applications are accompanied by an Heritage Statement (HS, Minerva Heritage 2021), which describes the historic background to the site and the buildings themselves and provides an assessment of the impact of the proposal on the significance of the site. The background section of the HS appears to be well-researched and the links with the textile industry are interesting, but there seems to be a small confusion in the reading of the Listed Building description relating to the first-floor window with re-used chamfered surrounds. The Listed Building description refers to such a window on the left end of the south-east elevation, which is illustrated in the HS plate 9 and plate 21, above the ground floor mullioned window, and does appear to be chamfered. The HS has not noted this but has identified a further such window with re-used chamfered surround in the north-west elevation which is not mentioned in the Listed Building description (HS 4.2.6 and 4.2.16, illustrated in plate 22, to right of front door) and assumes an error in location on behalf of the Listing inspector.

It is noticeable that the loft spaces, and thus the roof structure (which is often a useful aid to dating/phasing a building), were not inspected as part of the HS, which may be because access was not provided or was unsafe. There are however two photographs of the roof spaces in the Bat Survey (Envirotech Jul 2022, p.42), one of which shows that the visible section of the roof has been rebuilt in the C20th, the other of which mainly shows a propped hole cut through a dividing wall. Whilst it is possible that the whole of the roof structure has been rebuilt as per the first photograph (which would raise the question of why/how a section still retains stone slab roofing), it would be wise to assume that there could still be some survival of early roof timbers.

The HS suggests that the building as it stands is formed from a farmhouse, that may have once been divided into two cottages, and an added section forming a cart or carriage shed, with stable adjacent and hay loft over. The addition and subsequent loss of further structures at either end is also mooted, along with links to the textile industry. We would not argue with this, except to note that it is possible that the ground floor section of the surviving addition suggested as a former stable (the existing kitchen/diner) may have formed ancillary accommodation for a servant or farm-worker rather than a stable. Such accommodation could have been provided with heating/cooking facilities by connecting to the extant flue in the wall between it and the farmhouse, but this may require removal of internal plaster, etc. to investigate. The suggestion that the farmhouse was converted at some point to two cottages (HS 4.2.18, Plates 22 and 24) is certainly feasible, but it is also possible that the vertical joints or rebuilding noted reflect the original provision of a window to the ground floor room behind, since removed or blocked.

The outbuilding is suggested as a vernacular structure of the 18<sup>th</sup> century and to have been for a small cart or trap and livestock housing (HS 4.2.21-22). The plan form of the building with two open 'cells' to its front, as shown on the 1894 and 1908 OS 1:2,500 maps (HS Plates 5 and 6) would, however, suggest that this functioned as a smaller animal house such as a pig-stye or kennels during this period, and was altered later. The provision of a such a building and the presence of a feed-store or even a chicken coop over such a structure would not be unusual.

We would agree with the general assessment that the proposals as currently set out in the application would not appear to have a significant impact on below-ground archaeology.

Unfortunately, the assessment of the impact of the proposals on the structures (HS, section 6) does not seem to be so successful as the earlier sections of the document. The proposed works set out in section 6.2.1 seem correct, although I would query if the outbuilding roof is covered with slate or stone slabs (6.2.1.s) – the plans 'as existing' annotate this roof as 'stone' and the Bat Survey also refers to this roof as stone (e.g., lower photo caption, page 42) and it is also referred to as a flag roof in HS Appendix 5.

The assessment set out in HS section 6.4.3 misses several impacts from the proposals in 6.2.1, most of which are set out more clearly in Appendix 5. We would see impacts arising from items b, d, f, g, h, l, j, k, l, m, n, p, q, r, s, t, u, v, w, and x (assuming that items c and e are effectively like-for-like repairs or replacements – and that impacts on the flue/chimney from change (n) are considered, see below).

Given the number of stone slab roofs in the Slaidburn area, we would see these as a characteristic of the village architecture. Whilst there is only a section of the farmhouse roof still covered in these, we would be concerned that their removal (item b) is more than a minor impact, representing the final loss of an original covering material and removal of an element demonstrating change and alteration over time. Similarly, if the outbuilding roof also has a stone slab covering, then its loss and replacement with slate (item s) is also more than a minor impact (see also below). It is noticeable that there is no assessment of the condition of these roofs supplied with the application, and it would seem appropriate for such an assessment and further justification for these works to be

required by the council. If these works are shown to be justified and the outbuilding roof is of stone (below), consideration should be given to the repair of its roof using the material from the farmhouse, assuming they are of similar materials, rather than replacement with slate.

The insertion of an appropriately designed flue for a modern log-burning stove (item d) will have a minor visual impact. It is however likely to be relatively uncontroversial and has been allowed elsewhere, although its details will need to be well-considered and agreed with the council, as will any provision for dry log storage (not obviously included on the site).

The removal of some of the modern stud walling and its replacement in different configurations (items f, g, and h) is not necessarily harmful in itself, and the majority of the proposed works do not seriously affect the plan form or circulation pattern of the building.

The removal of the studwork from the present porch (item j) and the associated changes to the stairs (items l and m) however will result in the 'reversal' of the house to use the present door under the rear stone stairs as the main door and promoting the 'garden front' to primacy over the 'road front'. This, along with the proposed demolition of an original stone wall to form a modern 'kitchen diner' (item k) will make a considerable change to the existing plan form and circulation pattern of the building, nor do these works attempt to recreate an historic plan form. We would also have concerns about the stability of the first-floor part of the stone wall and the alterations to historic ceiling/floor beams required consequent to the removal of the ground floor portion of the stone wall. Historic England Advice Note 2 '*Making Changes to Heritage Assets*' (2015) states:

*The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.* (para 45).

Given that the "*early core of the property – a 17th century stone-built two-cell structure...*" (HS summary) is recognised as a major feature of the building, it would seem that these changes are more than the 'negligible' and 'minor' impacts set out in Appendix 5 Table 6 (but omitted from 6.4.3). They would appear to approach the level of 'major adverse' set out in Appendix 4, Table 4. They require both further investigation and a more detailed assessment of their impact along with strong justification before they should be accepted.

The removal of a 1970s fireplace (item n) is not in itself likely to cause a significant impact, but the complete loss of a visible fireplace from the historic core of the building may well be quite significant. This item is not apparently described or illustrated in the HS nor is its significance as an indicator of a historic fireplace location assessed. It may prove acceptable for the modern elements of the fireplace to be removed if the former presence of a fireplace can still be signalled, although the plans suggest that there is no

protruding chimney breast here. The impact of the loss of the fireplace on the flues and chimney above – there appear to be no other fireplaces serving it – also needs consideration. Would it be practicable or desirable to re-use a redundant flue for the SVP for the bathroom at this end of the building and omit an external pipe?

Items p and q impact the external stone steps on the garden front of the building. The HS notes that the steps are in 'very poor condition', but this is not supported by evidence of a condition survey or appropriate photographs. Because of the way that the stair is cantilevered out of the walling dismantling and reconstruction or repair will not be a simple task and we would suggest that further information on the present state of the stair is required, along with details of the rebuilding work proposed. A method statement for the repair or rebuilding (if found to be appropriate) and the detailed design of the proposed new railing and balustrade will need to be agreed with the council.

The replacement of the present garage door (item r) with a three-section wood and glass 'French window' would appear to have more than a 'negligible' impact on the appearance of the Listed Building (HS Appendix 5) and may suggest that the opening is not an original feature of the building (noted in the HS as 'legibility'). Whilst the desire for this change is understandable, a more 'agricultural' and less 'gentry house' design may tone-down its visual impact and signpost more of its original function. The loss of the present sliding door (and its associated mechanism) is however not considered to be particularly serious.

The proposed re-roofing of the ancillary building (item s) is mentioned above, as is the fact that this roof is described as 'stone' and not slate on the plans 'as existing' and in the Bat Survey. Indeed, in Appendix 5 of the HS the roof is described as '*One of few flag roofs in the Conservation Area*' and '*Has a strong vernacular character*'. It is also stated there that it is likely the earliest roof on site and '*Probably 18C or even 17C*'. Impacts would thus seem to be on the higher end of 'medium' or even 'major' rather than 'minor or negligible'. It would seem appropriate for this roof to be retained and repaired in its present form, if possible. As above it is noted that there is no condition survey of this roof or details of the work proposed. What repair work is required to the roof covering? Are there surviving historic timbers and do any require repair or replacement? Is it intended to insert any underfelt or insulation into this roof as part of the conversion to residential use? Much more detail on the need for this work, what is proposed and a strong justification for any changes should be provided on this aspect of the scheme before it is agreed.

Item (t) also appears to have a more significant impact than that set out in the HS. The complete removal of the '*likely original*' wall of '*probably 18C or even 17C*' date would appear to remove much of the evidence for the origin and use of the building, as would the removal of the present internal fixtures and fabric (item u). The totality of what is proposed would seem to retain only the original external walling, with the roof, floors and internal plan all being swept away. Items v and w would have lesser impacts, although no doubt some repair, adaption, and alteration of the exterior door (and other exterior openings) will be necessary, and further details of these changes will be required at some stage. Whilst the creation of a new use for this outbuilding would help ensure that it is maintained and retained, the impact of the present proposals is at least higher 'medium' if not cumulatively 'major' adverse, yet little if any justification is provided. A

more appropriate use may be as a workshop/garden and log store, servicing the main house and retaining the present divisions. The council may also wish to clarify if the residential use is intended to be as part of the normal use of the main house or an occasional guest bedroom, or alternatively as a commercial enterprise such as B&B use. The incorporation of a separate gated parking area at this end of the property (item x) could seem to imply the latter.

There is no mention in the application on the replacement of any floors in either the farmhouse, addition, or outbuilding, yet some are certainly necessary – it is surely not intended to convert the outbuilding to residential and retain the present concrete floor with dung channel or loose floor (HS 3.6.7, 4.2.21, plates 27, 29). Equally there is no mention of damp-proofing or insulation issues in all the buildings, nor of new heating and other services required in the outbuilding or the upgrading of such services in the main building. Such works could have significant impacts on the buildings, as well as impacts on buried archaeological remains.

From the above you will see that we have significant concerns regarding the proposals and that we consider that further information and details need to be submitted prior to any planning decisions being made, as set out in section 16 of the NPPF and the policies in the local plan. We would wish to be consulted again when such information is provided or if the council consider that such matters can be dealt with in other ways, so that further comments and advice can be provided.

Yours sincerely

*Peter Iles*

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Historic Environment Team