

ANNEX 5 - NEXUS PLANNING COMMENTS ONO THE PROPOSED CONSERVATION AREA DESIGNATION FOR SLYNE ROAD

Consultee Comment	Lancaster Conservation Team Response
Consultation questionnaire Q1 Do you agree with the proposal to designate a Conservation Area?	
<p>The area is primarily residential and does not comprise an area of particularly special architecture or historical interest as a conservation area. This is the required minimum standard set out by Paragraph 186 of the National Planning Policy Framework (NPPF) to justify a designation as a conservation area.</p>	<p>The residential character does not preclude the area from designation as a conservation area. The character of the area is outlined within our assessment. The fine group of civic and public buildings and the strong character of terraced villas which line the road were developed over a short period at the turn of the 19/20C and are part of the historic development of the area as a suburb of Lancaster. We, therefore, consider the area to be of special architectural and historic character.</p>
<p>In this regard, paragraph 186 of the NPPF states:</p> <p>“When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”</p> <p>The proposed area incorporates three listed buildings and a non-designated heritage asset, in addition to a number of Victorian villas which are commonplace throughout Lancaster. Given the existing statutory protections offered to the listed buildings in the proposed area, and the fact that the other buildings proposed to be included are not of specific historic interest, the proposal to designate this area is considered to be not appropriate or suitable.</p>	<p>The requirement of the Act regarding conservation area designation is not that individual buildings have to be of special architectural and historic interest but that the area as whole has this quality. Nor is it about the number of designated and non-designate heritage assets per se. It is about the contribution of these assets to the character and appearance of the area as a whole. Nevertheless, we consider that all the buildings identified as “positive buildings” on the designation proposal map would be considered as Non-Designated Heritage Assets (NDHA) on assessment. NDHA assessment is generally carried out in response to specific development proposals.</p>

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<p>Consultation questionnaire Q2 Does the proposed boundary include all the areas which have special architectural or historic interest? If no, what areas would you add or remove?</p>	
<p>Whilst the proposed conservation area includes a cluster of three listed buildings toward the south of the proposed boundary, it extends the designation across and along Slyne Road to include the residential dwellings and some offices fronting Slyne Road, inclusive of the NHS Properties site. As such, it is considered that the boundary extends to include buildings which do not have special architecture or historic interest.</p>	<p>The requirement of the Act regarding conservation area designation is not that individual buildings have to be of special architectural and historic interest but that the area as whole has this quality. However, we consider the architectural and historic character of these undesignated historic buildings contribute positively to the character and appearance of the area as a whole and as such give it special architectural and historic interest.</p>
<p>It is submitted that Lancaster comprises a number of examples where areas are made up of late Victoria terraced villas and buildings, all of a similar nature and character. On this basis, the designated area does not merit special architecture or of historic interest, and is not evidenced to comprise such merit by the Proposed Conservation Area Appraisal.</p> <p>As such, it is considered that the conservation area assessment does not identify special architectural or historic interest in the area to the extent that it adheres to Paragraph 186 of the NPPF.</p> <p>Indeed, our review of other buildings in Lancaster have identified a number of late Victorian suburbs in a linear arrangement, with common features including bay windows, sandstone walling and slate roofs, mature trees and greenery and stone boundary walls. Crucially, other areas also exhibit a distinctive mixture of architectural styles. Such areas include Bowerham Road and Dale Street</p>	<p>We agree that Lancaster comprises many late Victorian areas and that there is some similarity in their nature and character. Nevertheless, there are differences in the townscape, spatial character and architectural quality which determine whether an area is designated or not. In relation to the comparison of the proposed conservation area with other areas mentioned we would comment as follows:</p> <ul style="list-style-type: none"> • <u>Bowerham Road</u> – The architectural quality and character of historic buildings, while attractive, are generally plainer and of lower quality than Slyne Road, with fewer architectural features. The buildings are more closely related to the road with smaller gardens with less greenery. The area, therefore, is of lower interest in heritage terms than Slyne Road. • <u>Dale Street</u> – The architectural quality and character of historic building is similar to Slyne Road at the southern end of Dale Street. However, the buildings are more closely related to the road with smaller gardens and less greenery. Elsewhere along the street the

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	houses are plainer in design. The area, therefore, is of lower interest in heritage terms than Slyne Road.
<p>Our concerns here relate to whether the inclusion of the Slyne Road Offices within the proposed conservation area truly seek to conserve a feature of what the assessment considers to be “special architectural or historic interest”, or as a means to prevent the delivery of a positive strategy to ensure that this prominent gateway site within the urban area is bought back into a viable use.</p> <p>As such, NHS Property Services would question whether the conservation area as proposed demonstrates special architectural or historic interest that is the basic requirement for designation. Furthermore, in any event we request that the Slyne Road Offices/police station be removed from the proposed conservation area. Its inclusion will run contrary to Paragraph 185a) of the NPPF in that it will prevent a positive strategy to allow a viable use from being achieved.</p>	<p>The designation of a conservation area does not prevent the delivery of a positive strategy for the Slyne Road Offices/former police station. This site is similar to many other sites within conservation areas within the district which have been successfully and viably re-developed in the past. We have no reason or evidence to believe that the re-development of the site would be any different.</p> <p>If there are issues of viability, then this would be a material consideration in the planning process and would not necessarily prevent re-development proposals provided they are suitably evidenced in accordance with national and local policies.</p>
<p>Consultation questionnaire Q3 Does the Conservation Area Assessment outline the qualities which make up the area’s special architectural and historic interest?</p>	
<p>The conservation area Assessment identifies the following general qualities of the proposed area:</p> <ul style="list-style-type: none"> • A late Victorian suburb grouped in a linear arrangement along Slyne Road • Includes a core of civic and public buildings to the south set within generous grounds and greenery 	<p>As stated above, we consider the proposed conservation area is of specialist interest. While other areas mentioned may share some of the characteristics, including some buildings of similar design, they do not share all the characteristics and they are not of the same distinctive quality. It is the inter-relationship of these qualities that forms the area’s character and appearance and contributes to its special interest. This means they are of lower interest in heritage terms than Slyne Road.</p>

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<ul style="list-style-type: none"> • Distinctive mixture of Classical, Tudor, Perpendicular and Gothic revival styles • Modest terraced villas with rhythm of bay windows with distinctive polygonal piend form, sliding sash windows, canopied entrances and decorative joinery, ridges and finials • Prevalent use of sandstone walling and slate roofs • Mature trees and greenery, with planting to gardens fronted by stone boundary walls topped with decorative limestone " <p>Furthermore, the assessment notes that the qualities for the Slyne Road Offices are "symmetrical range in Tudor Gothic style, with characterful stepped gables and bay windows".</p> <p>NHS Property Services consider that these 'qualities' are generalizable to the wider area of Lancaster, and Cumbrian towns, and do not comprise special architecture, nor historic interest. As set out above review of Lancaster has identified a number of examples where a number of the above 'qualities' could also be applied.</p> <p>Again, with reference to Appendix B, it cannot be reasonably said that these features represent qualities that constitute a special architectural and historic interest. Victorian buildings are common place in Lancaster, and are mostly constructed from similar materials with common architectural features. Bowerham Road demonstrates a number of the same architectural styles, including a notable building at the junction of Bowerham Road and Coulston Road. This building exhibits a number of features similar to the Slyne Road Offices, not least stepped gables in a Tudor Gothic style. This building is shown at Appendix B.</p>	<p>As stated above, the special interest of a conservation area relates to the architectural and historic character of the area as a whole, rather than the character of individual buildings. Whereas listed buildings are designated for their special architectural or historic interest, most buildings within conservation areas are unlisted and, while being valuable heritage assets, may individually lack this special interest. However, the lack of buildings of special interest (in effect, listed buildings) does not mean that designation of a conservation area is unjustified. It is the contribution of all buildings, listed and unlisted, to the special architectural and historic <i>of the area</i> that is important.</p> <p>The former police station/NHS offices is very positively mentioned for its architectural quality within the Lancashire: North 2009 Edition of Pevsner, The Buildings of England (page 615), which is the foremost independent architectural guide of the nation's historic and contemporary buildings.</p>

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<p>We therefore are concerned that a number of the qualities expressed in the assessment of the proposed conservation area are neither special in architectural terms, being in fact common place throughout Lancaster, and are not of historic interest given their prevalence at locations throughout the City. The examples of interest on Slyne Road are by no means unique.</p>	
<p>Consultation questionnaire Q5 Do you have any other comments?</p>	
<p>As communicated through pre-application enquiry 19/01566/PRETWO and 20/00175/PREMTG, there are two significant issues with the building which relate to the structure and to mould. As such, the building is no longer efficient, and cannot be viably retained. This is evidenced by a Condition Survey Report produced for the building in October 2017. This concluded that the front elevation wall is significantly out of alignment, and that panels of walls have suffered varying degrees of movement but the whole elevation is affected. The extent of ill-alignment is considered significant. Furthermore, large parts of the building are also suffering from significant cracks and evidence of structural movement being evident throughout internal walls and ceilings within the building.</p> <p>Whilst this was not considered to represent an immediate safety concern at that time, the finding was that significant structural and outward movement has already occurred and this was considered to be progressive and ongoing and would worsen over time. The Report concluded that the works to repair and upgrade the building, given the structural concerns and its externally poor condition, along with the</p>	<p>The condition of the building would not preclude it from inclusion within a conservation area. We have no survey information but structural issues are not uncommon within historic buildings though are usually not insurmountable.</p> <p>We note the building is still occupied and is not thought to represent an immediate safety concern which suggests that the structural issues are not critical and might be addressed through repairs. The designation may encourage a different strategy to be adopted towards the site similar to other buildings in conservation areas elsewhere, based on retention and repair, so that the NDHA can be retained and continue to positively contribute to the area's character.</p> <p>As already stated, the designation of a conservation area does not prevent the delivery of a positive strategy for the Slyne Road Offices/former police station. This site is similar to many other sites within conservation areas within the district which have been successfully and viably re-developed in the past. We have no reason or evidence to believe that the re-development of the site would be any different.</p>

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<p>presence of other drawbacks, may not represent a cost effective or sensible strategy from a long term viability perspective. As such, preserving the building in its current form is uneconomical and unviable.</p> <p>Given this, an alternative strategy to deliver a positive future for the site is required. As referenced above, Paragraph 185 of the NPPF requires a positive strategy for the conservation of the historic environment. It is our position that including the Slyne Road Offices within the proposed conservation area would not represent such a strategy. Taking into account the structural issues in the building, and the costs involved with putting these right, the likelihood here is that the building would not be salvageable in its current form. This could lead to a situation whereby the building remains vacant, falls further into disrepair and contributes negatively to both the listed buildings and surrounding buildings. A sensible approach here would be to nurture a positive strategy for this location, that seeks to deliver a long-term use for this site and provides a positive contribution to adjacent listed buildings.</p>	<p>If there are issues of viability, then this would be a material consideration in the planning process and would not necessarily prevent re-development proposals provided they are suitably evidenced in accordance with national and local policies.,</p> <p>In our experience, it is very rare for there to be a justified need to demolish historic buildings within conservation areas. Most of the problems with their condition can be viably overcome by a programme of repairs.</p>