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Submitted via email to: conservationteam@lancaster.gov.uk

Dear Mr James

Representation to the Lancaster City Council Public Consultation regarding the Proposed Conservation Area Appraisal and Management Plan for Slyne Road in Skerton, Lancaster.
On behalf of NHS Property Services.
Slyne Road Offices, Slyne Road, Lancaster LA1 2HX

On behalf of our client, NHS Property Services, we submit this representation to Lancaster City Council's consultation on the proposed conservation area for Slyne Road, Skerton, Lancaster. NHS Properties interests relate to the site known as the Slyne Road Offices on Slyne Road, which are proposed to be located within this conservation area. A title plan is included at Appendix A.

The extent of the site owned by NHS Property Services is outlined within the title plan appended to this representation. The site is approximately 0.22 hectares in size is bound by Slyne Road to the east, Barley Cop Lane along the south, and residential dwellings to the north and west. It is described as an 'important building and feature' within the Proposed Conservation Area Appraisal as follows:

'Police Station (unlisted) symmetrical range in Tudor Gothic style, with characterful stepped gables and bay windows'

This letter responds directly to the questions within the Survey Questionnaire in turn, and provides further comment with regard to the above site.

Q1 Do you agree with the proposal to designate a Conservation Area?

[London](#)

[Birmingham](#)

[Manchester](#)

[Reading](#)

Proposed Conservation Area continued

Whilst our client is aware of the need to designate conservation areas and protect the district's heritage, NHS Property Services do not agree with the proposal to designate a conservation area at Slyne Road, Lancaster.

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.

In this regard, paragraph 186 of the NPPF states:

“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.”

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.

As such, it is considered that the designation of this area would be contrary to the purposes of conservation areas as dictated by the Planning (Listed Buildings and Conservation Areas) Act 1990 and contrary to Paragraph 186 of the NPPF.

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?

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.

Firstly, it is submitted that Lancaster comprises a number of examples where areas are made up of late Victorian 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.

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.

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 (see Appendix B).

It is incumbent upon local authorities to ensure that the designation of a conversation area is justified through an area's special architectural or historic interest. Our client believes that this designation in no way meets the test at Paragraph 186, and that the designation of this area risks setting an unjustified precedent that would risk devaluing the concept of preserving areas of value, rather than protect areas that lack a special and unique interest.

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.

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.

Q3 Does the Conservation Area Assessment outline the qualities which make up the area’s special architectural and historic interest?

The conservation area Assessment identifies the following general qualities of the proposed area:

- “• 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**
- 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 “**

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”.

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.

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.

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.

Q5 Do you have any other comments?

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.

Proposed Conservation Area continued

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.

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 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.

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.

Conclusions

As set out above, at Paragraph 186 of the National Planning Policy Framework it is made clear that local planning authorities have a responsibility to ensure that the designation of a conservation area justifies such a status. Our client is concerned that in designating this area, with reference to Paragraph 186, the concept of conservation risks being devalued through the designation of an area that lacks a special interest.

Moreover, we are concerned that should the present conservation area be adopted, given that the repairs urgently needed to the building to the building are unviable and that the NHS would be unable to sell the asset, the building may fall into a state of disrepair.

Paragraph 185a) of the NPPF requires a positive strategy for the conservation of heritage assets that seeks to ensure viable uses are achieved. Although we believe that designating this area is inappropriate in light of Paragraph 186, we welcome the opportunity to work with the Council to achieve such an outcome.

I trust the above is helpful and will be taken into account. We are willing to meet with the Council to discuss our comments above and look forward to hearing from you regarding this response.

Yours sincerely



Heather Lindley-Clapp
Associate Director

Appendix A: Title Plan

H.M. LAND REGISTRY		TITLE NUMBER	
		LA 790617	
ORDNANCE SURVEY PLAN REFERENCE	SD 4763	SECTION N	Scale 1/1250
COUNTY LANCASHIRE	DISTRICT LANCASTER	© Crown copyright 1985	



Appendix B: Examples found in Lancaster



Bowerham Road



Junction of Bowerham Road and Coulston Road



Dale Street