

Appendix 3 The Georgian Group

Subject: RE: Palacefields Local Centre LBC application - Submission of Updated Plans [LICH-DMS.FID400388]

Dear Dominic,

Thank you for reconsulting The Georgian Group on revisions to application 23/00129/LBC to undertake a scheme of works at Grade II* and Grade II listed former 'Tricorn Public House'. We thank you for the revised documentation responding to the concerns, comments and objections raised in our letters of 25th April, 24th May, and 5th July.

The Group furthermore thanks you for agreeing to meet with our representative via Teams on the 4th July 2023 to clarify our stance and discuss proposals.

The revised documentation which you sent to us on 5th July in an e-mail packet was considered in an extraordinary e-mail meeting of the Casework Committee.

The Committee again thanks you for submitting these revised documents and for being willing to engage with us positively to secure a sustainable and sympathetic future for The Former Tricorn Public House.

Advice.

Having assessed the revised documents however, The Committee must advise that we maintain our formal objection to the application on the same grounds as raised in our letters of 25th April, 24th May, and 5th July.

We advise that whilst the revisions go some way toward reducing the harm which would attend the proposed scheme, they fall considerably short of making this application acceptable.

Heritage Statement

The Group maintains our advice that a detailed Heritage Statement cannot be secured by way of condition as this document should form the foundation for the proposals as submitted. We therefore repeat our former advice that an appropriately detailed and complete Heritage Statement must be submitted for assessment and review prior to Listed Building Consent being determined.

The Group therefore continues to advise that the application continues to fail to meet the requirements of NPPF (2021) paragraph 194 and will also prevent the LPA from fulfilling its duty under NPPF paragraph 195.

We advise that the lack of a detailed HS continues to prevent The Group from making a full assessment of the impacts of the proposed scheme of works on the interior of the house.

Encroachment to rear of main house.

The Committee acknowledged the revised proposal to change Plot17 to a bungalow in an effort to reduce the impact of the proposed development on the setting of the Former Tricorn PH. We recognise that the proposals have been developed to eliminate unsurveilled spaces in an effort to prevent anti-social behaviour. We advise however that the elimination of unsurveilled spaces does not equate with the elimination of open space. We instead recommend that the plots immediately surrounding the house should be omitted to allow some open 'breathing room' around the main house and that the plots immediately bordering the open breathing space could then be rotated in

orientation to face onto the open ground allowing it to be surveilled. We strongly recommend that this is investigated as an option.

Amendments to the proposals for the stable range.

The Group welcomes the proposals to further reduce the number of rooflights to the stable range. We advise however that this does not address our principal objection to the proposals which is the formation of a large number of openings in the principal façade. We advise that if the proposal is to be considered acceptable then the number of openings proposed for the handsomely designed principal façade must be significantly reduced in number and impact. We advise that more openings could be accommodated in the rear elevation which we consider to be of lesser architectural significance than the principal façade.

We further continue to maintain significant concerns regarding the introduction of sub-divided property-tied amenity spaces to the stable range front, consisting of access road, car parking, bike storage, bin storage, trees, and property divisions. We advise that introducing these elements to the principal façade will significantly clutter, disrupt and weaken the legibility of the unified design of façade harming the building's historic character, setting, and aesthetic value. We recommend that a the principal façade should be kept free from intrusive elements which would erode the ability to appreciate its architectural significance.

We continue to advise that The Group considers the cumulative impact of the proposals for the stable range to constitute substantial harm.

NPPF

The Group advises that we continue to find that this application fails to meet the requirements of section 16 of NPPF, notably paragraphs 194, 195, 199 and 200. As we consider the works to the stables constitute 'Substantial Harm' we also draw attention to the requirements of NPPF paragraph 201.

Conclusion

When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the special interest of the building, as opposed to keeping it utterly unchanged. This obligation, found in sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (1), applies to all decisions concerning listed buildings.

The Group advises that the proposed scheme of works has the potential to cumulatively cause significant and irreversible harm to Grade II* listed 'Former Tricorn PH' and substantial harm to the Grade II listed stable range.

The Group advises that we would be pleased to meet to discuss developing a sustainable, sensitive, and sympathetic proposal for the reuse of the former Tricorn PH and stable range as Heritage Assets.

The Group therefore maintains our advice that we formally object to application 23/00129/LBC for the purpose of paragraph 5 of 'Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021' requiring notification of the application to the Secretary of State. The application should therefore be referred to the Secretary of State if the local planning authority decide to grant consent.

Yours Sincerely,

Thomas Whitfield, PhD, MLitt, BA (hons)
Conservation Adviser, Northern England

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In 2022 the Georgian Group began an annual Heritage at Risk list and we are now encouraging nominations for the 2023 edition. If you have any nominations for at risk buildings, structures, or landscapes dating from the period 1700-1837 (either designated or undesignated) please send them to: atrisk@georgiangroup.org.uk with as much information as possible including photographs (deadline: 8 September). More information here: <https://georgiangroup.org.uk/2023/01/17/heritage-at-risk-2>

