

The submitted Heritage Statement fails to recognise and communicate the building's more than special significance, in the top 8.5% of listed buildings nationally, and communicate its landmark status within and the important contribution to Whalley Range Conservation Area.

It appears to imply that as the open grounds and boundary enclosure of the Grade II* listed College are not mentioned in the list entry, these are of negligible significance. This is not considered to have been evidenced. Historic England's is clear that a list entry for a listed building is not an exhaustive description, but a summary of the main features of the building or site. It is the LPA's view that the grounds and the existing boundaries, including the Grade II listed gates, make a positive contribution to the asset's more than special significance.

It is also considered that the Heritage Statement has considerably undermined the development's impact on the Grade II* listed building and local views, streetscene and character within the conservation area. The document fails to acknowledge the relative height of the proposed mast as compared to existing tree cover, and the fact that most of the mature trees are deciduous, and in consequence would expose the new installations in the autumn and winter months. In consequence, it is not agreed that the impact on the character of Whalley Range Conservation Area and the Grade II listed entrance gateway and gates will be neutral, with a low impact upon the setting of the Grade II* listed College.

On account of its size and location, the proposed mast would undermine the landmark quality and appreciation of the Grade II* listed College, in particular consideration of the central tower and the frontage. It would also introduce an incongruous new addition in the local skyline and views across and into the conservation area, including from College Street and Clarendon Road, detracting from the area's special historic character and its distinctive townscape qualities.

It is pertinent to point out that the negative impact on views and character on the Grade II* listed building and the conservation area is not limited to areas and locations where public access is provided. Paragraph 13 of the PPG on Historic Environment is clear in that *"the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting"*.

The design of the mast, intended to resemble a Cyprus tree, would be insufficient to mitigate the negative impact of the proposal on the Grade II* listed building and the conservation area. Conversely, the additional enclosure would increase the impact of the development and appear more prominent in its context. Considering existing local context, the installation will not appear as part of the natural flora within the grounds and in the setting of the Grade II* listed building.

The negative impact and incongruity of the proposed new mast is acknowledged in the Heritage Statement, which reads that *"the Proposed Development will, however, be significantly taller (8.5m higher) than any of the nearby mature trees and, although designed to be disguised as a Cypress Tree, will be distinctive given the paucity of other similar trees of this type in the area"*.

The additional installations, equipment and enclosure, in the form of a 2.4 security mesh dense with razor wire, would exacerbate the negative impact of the development on the asset's more than special significance and introduce a considerable quantum of development to an area of open space.

The proposed new gate would cause additional harm to the special significance of the asset on account of the removal of the brick wall to the east, eroding the enclosure of the listed building which makes a positive contribution to its significance in its current form. On account of its design and appearance, the mesh panel fence and gate topped with a razor wire coil would fail to present as a complementary part of the brick boundary with railings to the Grade II* listed College. These interventions would appear out of place in its context and make for an incongruous and unsightly new addition to the conservation area.

The presence of existing modern interventions and past harm do not, in their own right, provide clear and justification for the location of the mast and perceived harm. As per paragraph 28 of Historic England Advice on 'Managing Significance in Decision-Taking in the Historic Environment' *"where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies"*.

It is unclear whether the installations would result in further harm to the existing trees, protected due to their location in the conservation area. Should there be an adverse impact on the roots protection zone, it would cause further harm to the conservation area, failing to comply with the principles of sustainable development as set out in the NPPF.

The proposed new installations are incompatible with the Grade II* listed asset's more than special significance and architectural interest and would have a high degree of harmful impact on the setting of the listed building and a medium degree of adverse harm the character and appearance of Whalley Range Conservation Area. The harm on the Grade II listed gateway and gates to the north would be minor adverse. Although the harm would be less than substantial it would nonetheless be material and cumulatively significant. The proposal would fail to preserve or enhance the significance of these assets as set out in Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In the absence of an options appraisal and consideration of alternative location of the proposed new installations, outside of the curtilage of the Grade II* listed building and the boundaries of Whalley Range Conservation Area, it has not been evidenced that the harm is the minimum required to deliver the installations and that great weight has been given to the asset's conservation, as per paragraph 199 of the NPPF. In the absence of clear and convincing justification for the exact location, the proposal fails to meet the requirement of paragraph 200 of the NPPF.

On account of the design appearance and prominent of the proposed new installations, which would include a 25m mast, mesh fencing with wire coil and an

industrial size new gate to the existing enclosure of the Grade II* listed College, the new interventions would fail to function well and add to the overall quality of the area and be visually attractive in their context, failing to meet the requirement of paragraph 130 of the NPPF.

Due to the perceived harm to these assets and the appearance of the proposed new interventions in their context, the proposal would also fail to meet Policies EN3 and CC9 of the Core Strategy, and UDP Policies DC18.1 and DC19.1.

In conclusion, the proposal is not considered acceptable on heritage and urban design grounds.