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Your ref: LBC/2021/0651

Our ref: 12/LBC/2021/0651/LCCHET

Date: 23/11/2021

FAO Erika Eden-Porter

Dear Mr Hickey,

Application no. LBC/2021/0651. Conservation repairs and fabric alterations at Towneley Hall, Towneley Hall, Burnley.

The works outlined in the application documentation are to be welcomed to ensure the long term survival of one of the finest buildings in the County.

The only areas which are of some concern to us are the reduction of the height of the wall that was the former exterior wall of the North Wing, and the potential loss of historic information that might be held in the leadwork of the site, such as the dated hoppers and any graffiti left by either the leadworkers installing roofing etc, or by "visitors" to the roof since the lead was placed. From experience such graffiti is fairly common and can take a number of forms, from drawn outlines of hands and feet to signatures and initials with dates.

The application details indicate that there has been significant photography of the interiors and plasterwork along with other details of the areas proposed for conservation repairs and alterations. In terms of recording the work for the long term it would be valuable to have a formal archive prepared of the photos and other documentation illustrating the areas that are being restored or altered with copies of this being deposited in appropriate locations (the Lancashire Archives and the National Heritage List for England Archive, with an electronic copy to the Lancashire HER are the principle ones) and I assume a copy will also be retained by the District Council as part of the Towneley Hall archive.

We would advise therefor that the following condition be placed on any permission which is granted:

Condition: No development shall take place on the site until the applicant, or their agent or successors in title, has secured the implementation of a programme of building recording and analysis, and the preparation of an archive detailing the

work carried out. This must be carried out in accordance with a written scheme of investigation, which shall first have been submitted to and agreed in writing by the Local Planning Authority. The programme of works should comprise the creation of an appropriate record of those areas of the building affected by the works, with photogrammetric or similar recording of the areas of stonework to be removed and a survey of the leadwork to record any historical features or graffiti. It should include a full description of the areas affected, drawn plans, elevations and sections which may be derived from the documentation already prepared for the works, and a full photographic coverage, inside and out. The record should also include a rapid desk-based assessment, putting the building and its features into context. This work should be undertaken by an appropriately qualified and experienced professional contractor to the standards and guidance of the Chartered Institute for Archaeologists (www.archaeologists.net). A digital copy of the report and the photographs shall be placed in the Lancashire Historic Environment Record and other appropriate archives.

Reason: To ensure and safeguard the recording and inspection of matters of archaeological/historical importance associated with the buildings/site.

Note: Relevant archaeological standards and lists of potential contractors can be found on the ClfA web pages: <http://www.archaeologists.net> and the BAJR Directory: <http://www.bajr.org/whoseWho/>. 'Understanding Historic Buildings' can be accessed online at <https://historicengland.org.uk/images-books/publications/understanding-historic-buildings/>.

This is in accordance with National Planning Policy Framework (MoHCLG 2021) paragraph 205: "*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible [Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository]*".

Please note that the above comments have been made without the benefit of a site visit.

Yours sincerely,

Peter McCrone

Planning Officer (Archaeology)
Historic Environment Team