



Natalie Beardsworth/Phil Cousins
Development Management & Building Control
Preston City Council
Town Hall, Lancaster Road
Preston, PR1 2RL

Phone: 07729 551429
Email: Lancashire.Archaeology@Gmail.Com
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FAO Ben Sandover

Dear Ms Beardsworth/Mr Cousins

Planning application 06/2018/0949: Development of a new healthcare facility, including erection of three storey building, with associated access, parking and infrastructure and demolition to group of existing buildings. At: Jeanne Jugan Residence, 228 Garstang Road, Preston PR2 9RB

The Jeanne Jugan Residence is recorded on the Lancashire Historic Environment Record (PRN40421). The entry notes the site originally comprised a large villa or manor house, with an associated stable block and other ancillary buildings, which was called 'Springfield'. This was built in 1868 for John Hawkins Esq. In 1890/1 the Little Sisters of the Poor took over the site. The larger three storey element was constructed in 1912 as a purpose built welfare building for the elderly. The site is currently known as the 'Little Sisters of the Poor, Jeanne Jugan Residence Care Home' and continues to be utilised for the care of the elderly.

The Heritage Impact Assessment accompanying this application indicates the site has low potential for evidence from the prehistoric period, medium potential from the Romano-British and low potential from the early medieval and medieval. The report identifies there is evidence for activity from the 17th century onwards for the post-medieval. For the modern period it identifies evidence of 20th century development within and surrounding the site. The report states there are no designated heritage assets located within the site boundary and no Scheduled Monuments or Registered Battlefields located within close proximity to the site and goes on to say that the Harris Knowledge Park (a Registered Park and Garden), several listed buildings and two Conservation Areas: Harris Park Conservation Area and Fulwood Conservation Area are located within close proximity.

The report determines that the development would not impact on the characteristics of the Harris Park Conservation Area, but may impact on its setting and suggests the site boundary should aim to maintain the separation between the road frontage and built form. Lancashire Archaeological Advisory Service (LAAS) would agree with this conclusion.

One of the reports most significant findings is that the postulated course of the Roman road 70d from Preston to Lancaster (PRN26146) is recorded as running through the proposed development site. The report indicates the proposals have the potential to cause loss or substantial harm to below-ground remains of archaeological interest relating to this road and suggests the application may not be allowed or mitigation would be required in the form of a field evaluation. LAAS would agree there is a potential for the proposed development to encounter buried archaeological remains associated with the Roman road. Surviving remains are however considered unlikely to be of the highest significance and could be adequately preserved by record (archaeological excavation and recording).

Furthermore the report suggests that Springfield (the original villa) was seemingly the first phase of development on the site and that Springfield House (St Mary's Home) was constructed in the late 19th century as a purpose-built care home, which incorporated the earlier house (Springfield). The report notes the proposals would entail the removal of Springfield House, and associated outbuildings, which are considered to be of regional significance. It determines that the magnitude of impact would be loss, resulting in a major impact to heritage significance. The report suggests that retention of this building within the proposed scheme would maintain the heritage significance.

The Demolition Plan (dated August 2018) accompanying this application shows the proposals will result in the loss of the original house (Springfield), but not the attached purpose built Springfield House. Presumably the proposals were adapted following the findings of the Heritage Impact Assessment. LAAS therefore welcomes the retention of Springfield House as part of the scheme.

Furthermore the Heritage Impact Assessment indicates the proposals entail the removal of the locally significant building 'Springfield'. It states the magnitude of impact would be loss and suggests that in order to mitigate that loss, it may be necessary to undertake a programme of historic building recording prior to any development taking place.

Given the above LAAS would therefore recommend that a programme of archaeological investigation, as suggested in section 6 (Discussion) is undertaken. This work should include: i) the creation of a record to level 3 of all the buildings proposed for demolition which date to pre-1912; (ii) the creation of a photographic record of the locally significant building Springfield House to put the site into context; and (iii) the excavation of areas not previously disturbed in order to identify potential remains of the Roman road and any associated road side activity which may be impacted by the proposals.

Consequently should the Local Planning Authority be minded to grant planning permission to this scheme, LAAS would recommend a phased programme of archaeological work. This should be carried out prior to any development of the site and secured by means of the following condition:

Condition: No development shall take place until the applicant, or their agent or successors in title, has secured the implementation of a programme of archaeological work. 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.

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

Note: The programme of archaeological work should comprise:

- i) The creation of a level 3 record of the buildings dating to pre-1912 proposed for demolition, as set out in *Understanding Historic Buildings* (Historic England 2016)
- ii) The creation of a photographic record of Springfield House as set out in *Understanding Historic Buildings* (Historic England 2016)
- (iii) Excavation of areas not previously disturbed in order to identify potential below-ground remains of the Roman road and any associated road side activity, which may be impacted by the proposals, followed by such subsequent work as required to investigate and record any remains encountered.

All archaeological works should be undertaken by an appropriately qualified and experienced professional archaeological contractor to the standards and guidance of the Chartered Institute for Archaeologists (www.archaeologists.net).

This is in accordance with National Planning Policy Framework paragraph 199: *"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"*.

Please note that the above comments have been made without the benefit of a site visit. If you need any further information or would like to discuss this further please do not hesitate to contact me.

Yours sincerely

Joanne Smith