
THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

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Your reference: 06/2023/0510 &
06/2023/0509
Our reference: 184323

22nd June 2023

Dear James Mercer,

RE: Change of use and extensions to the former Park Hotel to provide an apart-hotel (Use Class C1) with ancillary gym and co-working space, and a publicly accessible café or restaurant (Class E); construction of two new residential buildings and conversion of no. 8 East Cliff to residential use (Use Class C3); access improvements including a pedestrian link to adjoining park, new landscaping and car parking, drainage infrastructure and associated works.

Thank you for consulting the Victorian Society about this application. We **object** to the proposed massing and position of extensions to the former Park Hotel.

Significance and harm

The former Park Hotel was built in 1883 as a railway hotel catering to passengers traveling through Preston. Its strategic landmark location offers scenic views of the surrounding parklands and is a key feature of views in the Avenham Conservation Area, which is defined by a mixture of townhouses, attractive views, and listed parks. Notably, Miller Park and Avenham Park are both Grade II* listed and were designed by landscape designer Edward Milner in 1861 and 1864, respectively. Milner (1819-1884) originally apprenticed to Joseph Paxton, worked on a number of parks and gardens including Lincoln Arboretum, Pavilion Gardens, Buxton and the reconstruction of Crystal Palace at Sydenham. Miller and Avenham park are considered early examples of municipal parks and hold significant group value. The location of the hotel is therefore both extremely sensitive and extremely prominent affecting numerous other heritage assets.

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Our principal concerns are the lack of convincing justification provided for the height, and size of the proposed extensions (Block C&D) to the former Park Hotel.

The proposed extensions, both Block C and D, are considerably higher, by 4-5 stories, than the former Park Hotel, extending beyond the established building line of the hotel and constructed with a material that competes and accentuates the volume of this extension rather than attempt to hide it.

The massing of these extensions would obscure the undulating Gothic outline of the former Park Hotel from the railway line and both listed parks, - a crucial view now integral to the composition of both these early municipal parks. Currently, the eye is drawn through carefully landscaped gardens upwards to the former hotel. This proposal would permanently and irrevocably harm the existing 19th-century relationship with the composed wider landscape, leading to a prominent, long and top-heavy bulky mass that would mar the visual appreciation of designated and undesignated heritage assets surrounding it- both individually and as a whole ensemble.

The extensions would also become an overly dominant and out-of-place feature in the Avenham Conservation Area, which is currently defined by its relatively domestic scale and carefully designed views. The extensions do not respond to the scale of the conservation area or its materiality.

Any new structure should contribute to and enhance the conservation area while being subservient to the former hotel's size and outline in order to prevent substantial harm to a designated heritage asset.

Policy

The Central Lancashire Core Strategy states:

“Policy 16: Heritage Assets - states that opportunities should be sought to protect and enhance the historic environment, heritage assets, and their settings.

Policy 17: Design of New Buildings – the policy sets out a range of criteria that all development will need to consider having regard to the character and appearance of the local area.”

Paragraph NPPF 200 states: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification."

The application fails to preserve or enhance the historic environment, heritage assets, provide substantial public benefits, regard the character or appearance of the local area or offer a convincing or adequate justification for the scheme and the resulting harm to the designated heritage assets, as required by both the Central Lancashire Core Strategy and NPPF.

The public benefits are marginal and could be achieved by a much less harmful scheme with reduced massing and sensitive positioning which would maintain the prominence of the former hotel. This scheme should be rejected and the applicant worked with to develop more sensitive plans which will not harm Preston's heritage assets to this degree.

I would be grateful if you could inform the Victorian Society of your decision in due course.

Yours sincerely,

Guy Newton

Conservation Adviser