"The proposals would disrupt the established layout and linear street, specifically the following aspects:

- 1. The strong pattern of parallel streets gives distinctive views of the back of 1. the larger houses on Devonshire Road, within the Princes Park Conservation Area, to the South-East, and distant views across rooftops towards the Cathedral, to the North- West. These views and orientation provide the area with a strong and consistent character, not least in the way sunshine and light has a similar memorable impact on each of the historic streets.
- Present street widths are generous, and allow for the presence of trees. Windows are large and vertically-proportioned, helping to bring light into the houses.
- 3. Bay windows add to the effect of light-collection, as well as providing visibility up and down the street.
- 4. Sliding sash windows are elegant and allow full opening, without disrupting the pavement. They relate the Welsh Streets directly to Georgian precedents and pattern-books (see comparative illustration in 3.2. above). This is of critical importance – they were all part of the same overall design language and conformed to generally accepted notions of quality.
- 5. In the existing terraces, the small yards are relatively private areas by the back doors, shielded to some extent by the outriggers. In contrast, the gardens in the proposed scheme look very exposed and, as designed, will probably be quite uncomfortable places. In my experience, gardens of this type and configuration are often uncared-for or abandoned, although there can be exceptions to this rule as a result of ingenious landscaping (which I haven't seen proposed as part of the scheme) or particular local groups of enthusiastic people (which is not a controllable factor). In any event, I question the need for large private gardens, given the proximity of Princes

Park. It seems to me this is both an inefficient use of space and is likely to lead to less interaction between neighbours and therefore a lower level of social cohesion.

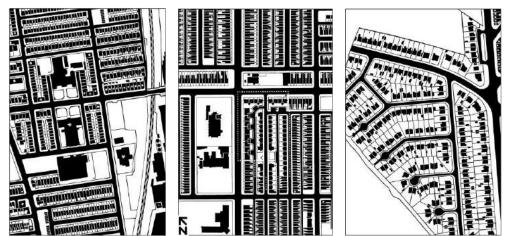


Flat and house plans for Barrow-in-Furness [left]. A later variant [right] has the same principles, of non-overlooking of the back gardens, applied to a larger 4-bedroom house. The 'mitre' allows the terrace to turn a corner, either 45° or 90°. Optimum house width and depth was used in order to maintain historic densities.

6. The proposed 'Green Street' represents a deliberate breaking up of the characteristic terraced street pattern. In my experience of similar green spaces in other terrace locations, these have not been successful. For example, in Barrow-in-Furness (see illustrations 12, 13, below) I had included small play and green areas at the midway point of Exmouth Street, at the insistence of planning experts. I remained unconvinced and regretted the loss of the density and coherence in the street. Some years later (after I had left Barrow), I discovered that these green areas had been replaced by a further six houses. This was apparently a response to requests from the local community. With the present proposals I would be concerned, in particular,

about the proposed length between Powis Street and Kinmel Street, in which one side of the street is faced by a new terrace and the other is faced by gable ends. I would question how likely it is that the 'Green Street' will be used, by whom and what for. In my view, it would be better instead to promote the use of Princes Park.

7. The use of concrete roof tiles and uPVC windows marks a deterioration, in terms of both appearance and sustainability, from the durable standards of Welsh slate and timber sliding sashes. If the site had been included within the Princes Park Conservation Area, such materials wouldn't have been considered. Although this site is not within a Conservation Area, it is very close to two CAs, and the materials proposed are unsympathetic to their character and history as well as that of the Welsh Streets.



Comparative plans, to the same scale, of Saltaire [left], Hindpool [centre] and pre-war semis [at a relatively high density] in Denton, Greater Manchester [right]. The asterisks indicate shops or communal facilities. The area within the dotted line in the central plan contains 79 houses and flats built in 1985.

"Means of regenerating the Welsh Streets that would be acceptable in design terms, unlike the proposed scheme, in my view would include:

1. Retaining the street pattern and retain the historic street names;

- 2. Restoring all those houses that can be restored;
- Allowing suitable replacement of those that are deemed to be 'too far gone' either on a like-for-like basis, or as an acceptable modern interpretation of the notion of the terraced house, promoting innovative and sympathetic design;
- 4. Filling in the gap sites with well-designed houses;
- 5. Establishing and promoting the easiest possible routes into Princes Park to meet the open space requirements."

Historic Links between Liverpool and Wales

"I would also like to say a few words to emphasise the historic links between Liverpool and Wales, although I know this has been covered in more detail elsewhere and I am not intending to put forward a professional opinion on the historical significance of the Welsh Streets (which others have done).

"The Welsh contribution to the rise of Liverpool was as significant as that of the Irish, the English and any of the many other nationalities that contributed to the city's growth. The Brython Press in Liverpool (*Gwasg y Brython, Lerpwl*) was for many years the leading Welsh-language publishing house. The Welsh colony in Patagonia was founded by those who sailed from Liverpool on 'The Mimosa'. But one of the most enduring contributions was the housing. Among the Liverpool Welsh were architects, builders and landlords, who morphed into a particular Scouse establishment, worshipping in Welsh in numerous chapels, most of which have disappeared or changed use (such as the imposing Chatham Street Chapel, now the Liverpool University Management School).

"Dewi Prys Thomas was born into one such Welsh-speaking community in Liverpool. He became an inspirational lecturer in his home city, before taking over as Head of the Welsh School of Architecture in 1960. He was eloquent about the

community and city he grew up in, but described the view of Moel Famau from his childhood streets as representing arcadia, just twenty miles but another world away. He spoke of *treftadaeth* as "a word imbued much more eloquently with atavistic depth" than the English term 'heritage'. Indeed, he had a vision of a Wales "radiant in her treftadaeth... in her mountains and valleys, and in the miraculous language and laughter of her children... radiant in the heritage of all her towns, and little villages." In the same year that Dewi Prys Thomas moved to Cardiff, Saunders Lewis (one of the founding fathers of Plaid Cymru and a native of Wallasey), in a notable television interview with Aneirin Talfan Davies, said: "The idea that because I was born in Liverpool I was born an exile from Wales is completely false.... I'm pretty sure that there were around a hundred thousand Welsh-speaking people in Liverpool during the period of my boyhood." For these distinguished Liverpool-Welshmen, an architect and a dramatist, the call of the Welsh landscape was irresistible. Their *hiraeth* included the architecture within that landscape. For architecture, alongside language and music, is a vital part of the well that sustains Welsh culture. The development of such cultures was explored by Eric Hobsbawm, Prys Morgan and others, in a brilliantly-titled series of essays, 'The Invention of Tradition'. Cultural traditions, consciously nurtured, can have a particular appeal for those who live within large multi-cultural cities."

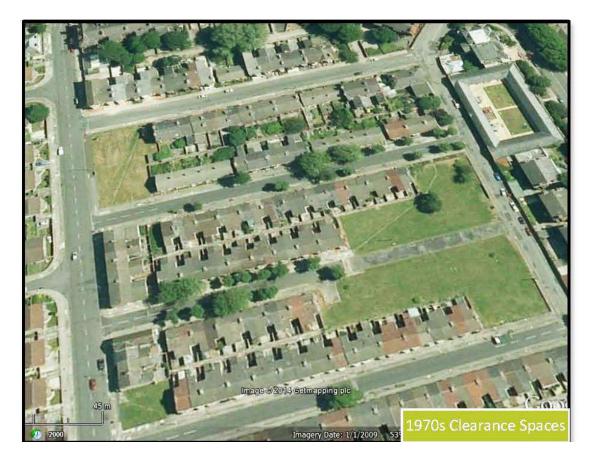


Two artworks, inspired by the campaign to save the 'Welsh Streets'. On the left is a quote from the Old Testament set against photographs of the original street signs, from 2006. On the right is a sketch of North Wales, seen from Liverpool, with a caption: 'The place of the pool – the misplaced capital city', first printed in 2003.

From Former Planning and Conservation Officer Alec Forshaw's evidence:

Alternative sites for new housing

"There is scope already within the Welsh Streets for building some new housing. This includes the existing vacant sites on Voelas and Rhiwlas Streets. However, more significantly, in terms of the overall planning for the provision of new housing to meet the demands of Liverpool's future needs, there are numerous vacant sites where there is considerable development potential for new housing. Many of these sites are in former Pathfinder and clearance areas, where little has happened since the demolition of the original properties. Over 15 hectares of HMRI clearance land remains vacant. The priority and allocation of funding would logically be to develop these gaps sites first before considering the demolition of existing stock, with the creation of potentially additional 'brownfield' land. The majority of cleared sites within the Inner core of Liverpool have had a negative impact on the townscape and social cohesion, while the recreational and ecological value is often low.



From Maisna Heritage Heritage Statement for SAVE, an aerial photograph showing the 1970s clearance sites within the Welsh Streets

"Liverpool City Council's Strategic Housing Land Availability Assessment (SHLAA) Update 2012 Final Report, published in 2013, identifies opportunities for new residential development throughout Liverpool. The schedule for Princes Park identified 59 potential sites for housing development, excluding the Welsh Streets, Phases 1 and 2. Within the immediate time period of 1-5 year 29 sites were identified for providing, with a new gain total of 599 new units. Several of these sites have been developed or are under construction, but there are still sites awaiting development capable of providing over 150 units. In the time period of 6–10 years, an additional 20 sites are identified, providing 226 new units; for the 11–16 year period a further 10 sites, with 49 new units are listed. In addition the windfall site of the former Mount Carmel Primary School at North Hill Street/Letitia Street/Admiral Street, not included in the SHLAA, is being brought forward for 38 new-build housing units by Plus Dane Group (Application 14F/0073). The previous buildings have now been cleared on this site.



"In the neighbouring wards of Picton and Riverside there are an even larger number of sites. In the 1-5 year period Picton has 18 sites with 700 units. Riverside has 52 sites providing 2483 units. In the 6-10 year period Picton has 15 sites with 362 units, and Riverside has 82 sites providing 2189 units. For the 11-16 year period Picton has a further 25 sites and 317 units, while Riverside has 22 sites providing 1469 units.

"It is clear that there are plenty of unfulfilled opportunities to build new housing both within Princes Park and the adjoining wards in a reasonably short time frame."



<u>Trees</u>

"The generous width of the existing streets and pavements has enabled a considerable number of street trees, planted earlier in the 20th century, to grow to a good size. There are good and seemingly healthy specimens of plane, acacia, alder, ash, rowan and lime trees, which provide a notable contribution to the streetscape. The proposals involve the loss of these existing mature street trees. While new specimens can be planted, it will be many years before these compensate for the loss of these large trees, or replace the habitat and townscape value which mature trees offer."



Voelas Street, part of which was destroyed by bombing in WW2. Note the maturity of the trees and also the open space that could be landscaped or used as a site for more housing.

Local opinion

"Widely different views have been expressed by the local community over many years concerning the future of the Welsh Streets, in line with the Housing Minister's observation that Pathfinder 'pitted neighbour against neighbour'. Nevertheless, it is clear that when first consulted in 2005 (two years after clearance plans were drawn up), resident opinion was decisively in favour of retaining the houses. In 2005 101 properties registered an objection to demolition with 74 in support, a 58% majority against demolition. In some streets there was overwhelming objection to demolition. In Madryn Street there were 35 objections with just one supporter. The 2005 Princes Park NRA showed majorities against demolition in Kelvin Grove (94%), Voelas Street (53%), Rhiwlas Street (70%), Treborth Street (80%), South Street (100%) and High Park Street (62.5%). Overall public consultation responses

to the 2005 NRA show 78% of respondents against demolition – 338 objections with 97 in favour (Princes Park NRA 2005 Pages 104 – 106).

"There is evidence that local opposition has been worn down over time, with a process of attrition, blight and neglect. As noted in the National Audit Office's Report of 2007, acquisition of existing properties, proposals for demolition and redevelopment and interim environmental deprivation cause great stress in existing communities.



Former residents of the Welsh Streets, Magda and Tarquin Maylam, who submitted evidence to the inquiry

"Interviews with residents who did not want to leave show they did not feel their voices were listened to, and that they were heartbroken to be forced from what they felt were good homes in a decent area. An example is Mrs Carmen Muberry who lived at 35 Madryn Street for 60 years between 1948 and her unwilling departure in

2008, interviewed by Trevor McDonald on TV's *Tonight* in 2006 and by Jonathan Brown in 2014.

"Individual or family aspirations, coupled with worries about blight and uncertainty, are sometimes at odds with those trying to see the area in its wider context. For some of those people still living or working in the area the continuing delay is deeply disconcerting and the opinions of 'outsiders' are not always welcome. However there is also a strongly-felt view among local people that lifting the current blight and getting the right decision is the most important thing in the long term. Some long-standing residents have claimed that their existing houses to be slums and are very keen to move to new accommodation, perhaps semi-detached houses with large gardens. However it remains the case that terraced houses remain popular as buildings to live in. Residents' concerns are usually more to do with specific and relatively easily solved issues like damp and cleanliness, or safety and the reputation of the area, problems brought about by the blight imposed by the scheme itself. While some want to move there are others who would like to stay and who appreciate the existing houses as adaptable and flexible. Expectations of new housing have become inseparable from demolition in some residents' minds, due to the rhetoric of the Council, even when the two are not necessarily inter-linked or inter-dependent. As for those who do want to move to a new-build house, or out of the area altogether, there are many 'outsiders' who would like to move into the Welsh Streets."

Neighbourhood Renewal Assessment (NRA)

"The Princes Park NRA Review and Update Report of January 2013, produced for Liverpool City Council attempts to summarise residents' opinions (pages 51 - 57). In particular it focuses on the October 2012 Resident Survey. It claims that the 50% response of existing households was 'high'. In my experience of situations where people are in danger of being re-housed, it is a rather low figure. What it did show is that 72% of the respondents were 'satisfied' or 'very satisfied' with their existing house. Of the 25% who were 'dissatisfied' or 'very dissatisfied', it was because of the run-down condition of their house. The survey questionnaire was unclear whether the option of moving to a 'new home' had to be a new-build house or whether it could be an existing house renovated to equivalent modern standards. Understandably very few wanted to move to another existing house, unimproved. Significantly, 79% wanted to stay in the area.

"There are some who say that the depopulation of the Welsh Streets, particularly Phase A, has gone so far that any sense of social cohesion in the area has vanished. There are others however who take a more optimistic view. Paragraph 7.26 of the NRA Review and Update Report highlights the strength of local community spirit in the Welsh Streets, including worries about how facilities can be sustained. It is surely the case that the local community can be nurtured and rebuilt more easily by rehabilitating the existing fabric, with an element of new build on the vacant sites. The wider social benefits of retaining existing fabric are also an important part of the consideration of the historic environment."

Madryn Street

"Madryn Street has particular 20th century cultural interest because of its associations with Ringo Starr... Madryn Street was described by Evan Davies in his BBC 'Mind the Gap' programme as "a beautiful rickety little street". The proposed retention of just the stub end of the street, to be surrounded by low-density modern housing will greatly diminish the existing character and appearance of the street and its setting.

"On the opposite side of High Park Street the Empress Public House is another building with strong connections with the Beatles, being one of their first performance venues and appearing on the cover of Ringo Starr's 1970 solo album, *Sentimental Journey*. It is surely a candidate for statutory listing in terms of its

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architectural, historic and cultural interest. Madryn Street and the other Welsh Streets have group value with this other undesignated heritage asset."





Beautifully laid tiles by WayneHemingway Design, provided for the house by British Ceramic Tiles

Planning Policy

"Paragraph 135 of NPPF requires that the significance of a non-designated heritage asset should be taken into account in determining the application. A balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset. It is considered that the scale of harm caused by the large amount of demolition, coupled with the poor quality of design of the replacement housing, will very greatly reduce the significance of the Welsh Streets, both individually and as a group, as a non-designated heritage asset.

"Paragraph 3.13 of Liverpool City Council's Sustainability Appraisal Non-Technical Summary states that the focus on prioritising the reuse of previously developed land and buildings, and the protection of heritage assets, will contribute to preserving Liverpool's cultural and historic heritage and local distinctiveness. Negative effects could be felt if new development is not sympathetic to its surroundings. It is considered that the proposals will have negative effects.

"The Welsh Streets are located close to the grand Princes Avenue, one of the spokes of Liverpool's radial structure and a spectacular Victorian set-piece. The Welsh Streets contribute to the setting of the adjacent Princes Park Conservation Area whose boundary adjoins South Street (see map on Page 81 of Princes Park Conservation Area Appraisal page 81, Core Document 6.32). Virtually all the houses on the west side of Devonshire Road are statutorily listed Grade II. The Welsh Streets contribute to their setting. Indeed the map of 1846 shows that South Street was originally the rear access lane for these houses and for any stable accommodation they may once have had. The orientation of Devonshire Road, as one of the main developments enclosing Princes Park itself, influenced the subsequent layout of the Welsh Streets to its rear.

"The rear elevations of the Devonshire Road houses are particularly and unusually fine, with symmetric and balanced fenestration. The internal position of the staircases in these houses results in principle rooms at the rear as well as at the front. These rear elevations, and the boundary walls to South Street, are built in the

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same red brick as the Welsh Street terraces. There are long views down most of the Welsh Streets to the rear elevations of these grand three storey houses in Devonshire Road. Similarly there are views out of the Devonshire road properties across the Welsh Streets. This relationship is harmonious and mutually beneficial.

"The Welsh Streets undoubtedly contribute to the setting of the Princes Park conservation Area and the listed buildings. Its demolition and redevelopment as proposed will cause harm to the setting of Princes Park CA and the listed buildings. "The new design of the new housing and street layout proposed, as outlined above, is suburban and undistinguished in character, and will form a stark contrast with the early Victorian character and appearance of the adjoining Princes Park Conservation Area, and indeed with those existing mid-Victorian buildings within the Welsh Streets that are proposed for retention. The harm caused to the Conservation Area would probably be considered as insubstantial and would thus come within the remit of Paragraph 134 of NPPF, whereby "this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."

Deliberate Neglect

"Generally the houses now vacant and 'tinned up' are in local authority or registered social landlord ownership, leaving isolated areas of private ownership in amongst them. Services have been withdrawn and some of the empty properties have been vandalised. For example, the deliberate removal by the local authority of lead flashings and rainwater goods, including downpipes on front elevations on the pretext of 'avoiding theft', is a petty and misguided management strategy, leading almost inevitably to water penetration. What might be described as a form of 'managed decline' could also be considered to be deliberate or 'deliberated' neglect. Greater detail of condition and remedial costs are given by Edward Morton in his Proof of Evidence.



Management companies at work on the Welsh Streets, who are paid to keep the streets clear and the deteriorating properties bolted, but not to repair them.

"Paragraph 130 of NPPF states that where there is evidence of deliberate neglect of or damage to a heritage asset (designated or non-designated) the deteriorated state of the heritage asset should not be taken into account in any decision. The NPPG further explains that where there is evidence of deliberate damage to or neglect of a heritage asset in the hope of making consent or permission easier to gain, the deteriorated state of the asset should be disregarded. It is very arguable that the pre-meditated removal of fabric and the lack of maintenance on existing vacated or decanted houses constitutes deliberate neglect. Apart from the tinning up of the windows, presumably to deter break-in, there has been no effort to keep the vacated houses in good condition."



The house on the right was in good condition when it was requisitioned for clearance, and has since deteriorated due to lack of drainpipes and maintenance.

Sustainability

"The Welsh Streets are close to the City Centre, within 10 minutes walk of the cathedral, and even closer to the university. The existing houses are an asset that could provide a range of useful, affordable and flexible accommodation. Refurbishment is likely to provide a diversity of unit sizes, including smaller units attractive to young couples, students, retired and elderly people, and single households who value being near the employment, educational, cultural and recreational facilities of the City Centre. The retention of high-density housing close to the City Centre is likely to be mutually beneficial, and will help to sustain and revitalise local shops and businesses. The SHMA in Paragraph 4.35 notes that net inmigration into the City Centre is a key driver of growth in Liverpool's economy, and that this is assumed to continue. This will also involve a 'ripple out' effect to adjacent wards, as confirmed by the Princes Park Ward Profile 2014 (Core Document 6.34) which shows a 23% increase in population since 2001. The

retention, refurbishment and re-population of the Welsh Streets can help and reinforce this. Indeed, regeneration of the Inner Core is likely to be as important to the future prosperity of Liverpool as the City centre itself. Loss of population through redevelopment will not help the economic regeneration of the City Centre or the delivery of Local Plan objectives.

"Paragraphs 6 – 10 of NPPF set out the agenda for how the planning system should contribute to the achievement of sustainable development, combining the three dimensions of economic, social and environmental. The core planning principles are set out in Paragraph 17.

"The proposals for the wholesale demolition in the Welsh Streets run contrary to these aspirations. Aspects relating to the economic and social dimensions of sustainability have been dealt with above. Don Foster MP's Ministerial letter to David Ireland dated 1st February 2013 reiterates the Government's view that Pathfinder-style demolitions are "economically, socially and environmentally wasteful.

"In terms of environmental impact, demolition itself results in a huge loss of embodied energy, comprising the existing built fabric. Even if new housing is designed to the highest energy-saving standards it is generally accepted to take at least 30 years to recoup the energy used in demolition and construction (Royal Commission on Environmental Pollution Report 2007, Building Research Establishment *Knock it down or do it up?* 2008). While refurbishment may not be to such high energy-saving standards, the energy used during building work is a fraction of that. It is also likely that within 30 years, refurbished properties themselves would have received a further upgrade in their energy performance.

"English Heritage has carried out research into the level of embodied energy inherent in older buildings. This showed that a typical Victorian terraced house contains embodied energy equivalent to 15,000 litres of petrol.

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"In terms of the overall effect of the proposals they will have an adverse impact on the City Council's environmental, social and economic sustainability policies."

Refurbishment

"While there are powerful arguments that the proposed redevelopment of the Welsh Streets is no longer justified in terms of housing need, and is harmful in terms of loss of heritage, social cohesion, employment, tourist potential and embodied energy, it is essential that any alternative strategy to retain and refurbish the existing terraced houses is viable, fundable and deliverable. After years of decanting, planning blight, minimal repair and neglect of fabric, the costs of refurbishment for some of the houses are now much higher than they might have once been. While Paragraph 130 of NPPF states that deliberate neglect of a heritage asset should not be taken into account in any decision, this relates more to the balancing of public benefits against harm. It does not help towards footing the bill to rectify the neglect.



with a conservation and community-led approach.

Alternative Approaches B. Full Refurbishment

B.2. (P2) 29 Powis Street, Welsh Sts, L8



29 Powis Street - Restored for £24k by the Trevor MacDonald Tonight programme (Granada TV).

"There have been many examples elsewhere showing how run-down Victorian terraced housing can be upgraded, including from Urban Splash and local authority renovations in Salford, and projects by Manchester City Council in Northmoor and by Miller Homes in Moss Side. In Liverpool, terraces forming part of Richard Owen's other 19th century estates have been sustainably refurbished, such as Claribel Street and the Camelot Streets. Plus Dane are now pursuing renovation of empty homes in nearby Granby. Liverpool City Council received an overwhelming response to its 'Homes for a Pound' scheme, with about 4,000 expressions of interest for just 20 properties. It is entirely wrong to regard the existing properties as 'obsolete', as the Princes Park NRA Review and Update Report 2013 persists in doing. See Appendix 10 for further examples of refurbishment of terraced housing in the Merseyside and Manchester.

Alternative Approaches B. Full Refurbishment

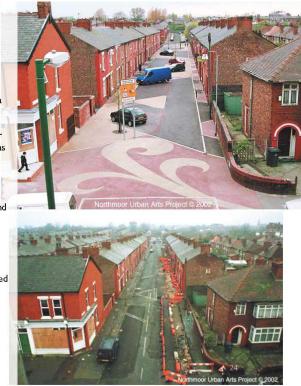
B.7. Northmoor, Manchester, 2002

The Northmoor project in the Levenshulme/Longsight area of inner Manchester was undertaken by Manchester City Council with social landlords and community groups between 1997 and 2007, and should have been an exemplar for Liverpool's HMRI Pathfinder interventions. The area was suffering from low values, high turnover, a degraded public environment and pockets of dereliction.

A radical but sensitive public sector intervention has transformed the neighbourhood into a desirable, diverse and delightful inner city district, working with the existing community and housing form, instead of erasing them as is being suggested for the Welsh Streets.

This is considered to be an internationally important case study of enlightened urban regeneration, and it was delivered for ± 20 m.

http://www.homesand.communities.co.uk/transformationnorthmoor-manchester



"Plus Dane have accepted the principle of refurbishment for 37 of the existing Welsh Streets properties, including 16 houses in Madryn Street, following a vigorous campaign to save Ringo Starr's birthplace. On 14th June 2012 Grant Shapps visited Madryn Street, and announced: "In a ground-breaking experiment, Liverpool city Council have agreed to give the local community the opportunity to take over and refurbish 16 of the properties on the street, and in so doing gauge the demand for such properties in the wider area". "I am keen that this is just the start. That's why I'll be watching closely to see how the refurbishment of these 16 houses progresses, and how we can use this to prevent more houses from being demolished". (www.gov.uk/government/news/rock-starrs-home-saved-with-a-little-help-from-his-friends). Unfortunately no such opportunity has been given to the local community, and even though planning permission would not be needed for repairs and renovation of these 16 houses, they have been tied in to the comprehensive Plus Dane scheme, now under consideration.

"Refurbishment of most of the existing terraces, including those that are vacant or occupied, can be delivered whilst meeting current energy-savings standards. In terms of funding there are various alternatives, some suited to provision of social housing, others for the private market. In order to be comparable with the Plus Dane scheme it had been assumed that an overall refurbishment package would need to provide the equivalent amount of social housing.

"However, in terms of tenure mix Plus Dane Group's proposals are remarkably unclear. In Liverpool City Council's letter on 10th April 2014 it is stated in Paragraph 6 that "The proposed tenure mix for Phase A of the Welsh Streets remains subject to on-going contractual negotiations and therefore will only be confirmed once this process is concluded. The proposed tenure mix to Phase B will be subject to the same process once contractual negotiations commence". Nevertheless SAVE is confident that refurbishment of the existing houses could be achieved under a variety of tenure options, and providing a range of unit sizes."

Alec Forshaw's Conclusion

"The National Planning Policy Framework requires that an overall assessment of the merits of the proposed redevelopment of the Welsh Streets should involve the balancing of the public benefits achieved against the harm caused. It is concluded that the significance of the Welsh Streets as an undesignated heritage asset has previously been under-valued. It is considered that the proposed demolition in Phases A and B of the proposals would seriously reduce the significance of this undesignated heritage asset. It is also considered that both the demolition and the replacement new housing, by reason of its poor design, would cause harm to the setting of designated heritage assets, comprising the adjoining Princes Park Conservation Area and listed buildings in Devonshire Road. Considerable weight should be given to the desirability of preserving the setting of listed buildings when carrying out a balancing exercise in planning matters.

"It is considered that this harm is not out-weighed by public benefits. The original HMRI justification, if it was ever valid, has disappeared. The overall loss of housing units is now a disadvantage in terms of meeting Liverpool's growth targets. There is now strong demand for 1 and 2 bed units which the proposals do not provide, but which the existing terraced houses can help to meet. Such demand as does exist for large family houses in Liverpool can be provided on other housing redevelopment sites in the neighbourhood and elsewhere in Liverpool, not involving the needless demolition of existing housing. In addition the refurbishment of properties on Kelvin Grove will provide some large family homes. The new housing is not of good design or townscape quality. The construction of new houses that meet current energy-saving standards does not out-weigh the overall energy costs of demolition (including embodied energy) and construction (materials and transport). The blight and neglect of the area, which has been caused by deliberate planning policy, acquisition and maintenance decisions, should be discounted under Paragraph 130 of NPPF. In any event this blight and neglect can better be remedied by the repair and refurbishment of the majority of the existing houses, coupled with welldesigned infill on vacant sites. In terms of social cohesion it is considered that this would be more successfully achieved by allowing those existing residents who wish to remain in the area, and in their existing houses, to do so, and by retaining and enhancing the existing and familiar townscape."

Extracts from the evidence of David Ireland, Former Direction of the Empty Homes Charity

"My involvement in the Welsh Streets dates back to 2010. I had been aware of the Welsh Streets area and the council's proposal to demolish the houses for many years. The Welsh Streets area was one of the largest areas of vacant housing in the country, and represented one of the largest projects in the country under the Housing Market Renewal Programme. It was an example of what I feared would arise, an area where homes had been emptied for a clearance programme but

clearance and rebuilding was heavily delayed, resulting in a much greater vacancy rate than before the council intervened.

"In June 2010 I visited the Welsh Streets and heard reports that the developer (Gleesons) that were to build houses on the cleared site had pulled out. I was in regular contact with ministers and officials from the Communities and Local Government Department. It appeared likely that a change of policy on Housing Market renewal was likely. I was concerned when I heard that Plus Dane were intending to pursue demolition anyway and saw that they had submitted a planning application to the council for permission to do so. The planning application did not include proposals to build new houses in the place of the demolished houses. I submitted an objection to the application in a letter to Liverpool Council dated 24th August 2010 (DI1).

"In October 2010 the Chancellor of the Exchequer announced that the Housing Market Renewal Programme would be withdrawn. Whilst not surprised by this announcement, I was concerned that unless councils adapted to the change in policy, large areas of housing could remain empty for many years. I wrote to a number of councils about this including Liverpool.

"It was on this basis that on 31 January 2011 I wrote to the then Liverpool council leader Councillor Joe Anderson specifically about the proposal to demolish the Welsh Streets, which I considered the most worrying aspect of the councils Housing Market renewal programme. I asked him to consider alternatives to demolition in the light of the change of government policy and the recent news that the council's developer for the Welsh Streets, Gleeson homes, had pulled out of building homes on the site. I suggested other alternatives including self-renovation and homesteading. I received a response from the Director of Housing John Hale. His letter acknowledged that the situation had changed but was not willing to consider alternatives. He cited a number of reasons for continuing with the policy of clearance, including that "an existing housing association (presumably Plus Dane) already owns significant numbers of properties in the area. They do not regard