

CONSULTATION RESPONSE: OBJECT

Mr Sam Rosillo
Leicester City Council,
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By email to: sam.rosillo@leicester.gov.uk;

Cc: pooja.pau@leicester.gov.uk; &
planning@leicester.gov.uk

Our reference: 24002

17th January 2024

Dear Mr Rosillo,

20220709 - Hybrid planning application comprising: FULL Planning Permission for the demolition of all buildings on site (excluding 2 chimneys and façade of the 1865 OTB building); alterations to the southern façade of the 1865 building (OTB); erection of 6 storey building at rear of retained facade to provide 45 flats (20 x 1 bed and 25 x 2 bed) (Class C3) with a mix of commercial, amenity and service areas on the lower levels; single storey side extension to retained façade and building; and up to 366sqm of commercial uses (Class E and F2) and OUTLINE permission for the construction of buildings ranging between 4 and 18 storeys to provide up to 1,100 dwellings (Classes C2 and C3), commercial uses (Classes E, F2 and Sui generis (public houses, wine bars, drinking establishments and hot food takeaways)), hotel (Use Class C1), multi-storey car park, pedestrian footbridge across Grand Union Canal with associated landscaping, public realm and associated infrastructure (with all matters reserved) | Corah Factory Site, Burleys Way, Leicester.

SAVE Britain's Heritage **objects** to the above planning application for the demolition and redevelopment of the Corah Factory site on grounds that the proposals would substantially harm the site's historic significance and links to one of Leicester's historically key industries. Whilst we support the principle of regenerating this important city centre site, we consider the demolition and proposed new buildings would be substantially harmful in heritage terms, and the failure to seek reuse and conversion of the existing historic buildings across the site unsustainable in planning terms. For these reasons, we object to this application and call on the Local Planning Authority to refuse planning permission.

Given the strategic importance of this application and the controversial issues raised, we request this application is referred for determination at planning committee level rather than by delegated decision.

Proposal

This application proposes the demolition of the former Corah Factory site, excluding two chimneys and the façade of the 1865 Old Textile Building, and the construction of a 6-storey building to provide 45 dwellings. Outline permission is sought for the construction of further dwellings (1,100) housed in buildings up to 18 storeys tall.

Significance

The former Corah Factory, located on Burleys Way, was originally known as St Margaret's Works. In 1865-66, the first building for the new hosiery factory was constructed for Thomas Corah & Sons to designs by William Jackson. The factory was extended multiple times in the early 20th century and up to 1940s as the industry continued to expand. This resulted in a variety of architectural styles displayed across the factory complex, ranging from the Old Textile Building whose facade resembles elements of a country house (c.1865) to the art deco style Shipping and Printing Department (c.1919) and 'Horseshoe' Building (c.1937-47). Together, these buildings form a distinctive industrial complex which has shaped the character and use of the northern city centre for over 150 years.

Leicester City Council's Local Heritage Assets Register (LHAR) notably recognises the Corah Factory as an '*excellent representative of a former hosiery complex*'. Leicester's hosiery industry was one of three key industries in the mid-19th and 20th centuries which shaped the city's townscape and economy. Significantly, the Corah Factory was one of the largest factories of its type when first built. Despite its closure in the 1990s, the Corah Factory retains its historic value as a valuable testament to the city's industrial past and development as one of the country's largest domestic hosiery factories and employers.

The former factory site survives remarkably intact and occupies a prominent plot within the city centre. It also sits within the immediate setting of multiple designated heritage assets, most notably to the west, the grade I listed, 15th-century church of St Margaret, which is of exceptional architectural and historic interest. To the north sits the grade II* listed Abbey Park and Garden Registered Park and Garden (RPG), designed by William Barron and opened in 1882.

The historic, cultural and architectural significance of the Corah Works is strongly affirmed by the specialist advice of multiple statutory consultees - including Historic England, the Twentieth Century Society and Historic Buildings & Places – and strong local campaign by Leicester Civic Society.

Assessment

We **object** to this proposal on the following grounds:

1. The almost complete demolition of the Corah Factory proposed would constitute both the loss of a NDHA and Locally Listed Building and the severance of an important chapter in Leicester's industrial history. Para 209 NPPF (2023) provides that when weighing applications that affect NDHAs, a balanced judgement must be reached regarding the '*scale of any harm or loss and the significance of the heritage asset*'. The remarkably complete nature of this site means its historical use and development remain evident and contribute positively to the surrounding area. Its significance as a locally listed NDHA is therefore considerable. The scale of harm caused by demolishing the majority of the site must therefore be considered substantial in Framework terms and an extreme response to regeneration. For these reasons, SAVE considers that this application does not satisfy the policy test of NPPF 209 and so should be refused consent on heritage grounds.
2. The proposed loss of this site would contravene Leicester City Council's Core Strategy (July 2014) where the application site is identified as a 'Strategic Regeneration Area' for housing development. Within regeneration areas, the Core Strategy states that '*particular importance will be given to the integration of the historic environment with new development through encouraging heritage-led regeneration*.' (CS Policy 18 Historic Environment). This demolition-led proposal cannot be considered heritage-led as it would see the near total loss of a locally listed site of clear heritage significance and landmark character.

NPPF Para 207 (2023) requires that when assessing proposals which involve any harm or loss, these negative impacts should be weighed against the public benefits of the scheme. A key benefit used to justify this demolition application is the provision of over 1000 new homes. The applicant's Retention Feasibility Report, however, identified that a number of existing buildings on the site (including the Old Warehouse c.1882 and The Corner Warehouse Building c.1935) remain in 'serviceable' condition. We therefore argue that the existing historic buildings can practicably be reused and adapted to provide characterful and much

needed housing on the site, whilst retaining its heritage significance as required by the Core Strategy (2014). On this basis, we do not consider the purported public benefits of this scheme can, in its current form, outweigh the harm identified and the conflict with the City Council's own strategic policy for the site's regeneration.

3. The visual impact of the scale and massing of the proposed development, particularly the 18 storey tower, would cause less than substantial harm to the grade I listed St Margaret's Church and grade II* listed Abbey Park and Garden RPG which are in close proximity to the application site. The 'AVR Verified Views' document demonstrates the proposed tower would introduce a radical scale which is otherwise alien to the city centre and would negatively impact views of the church and views out of the RPG. Para 206 NPPF (2023) requires that, *'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'*. Read as a whole, we do not consider the current plans satisfy this policy test.
4. We object to the use of an outline planning permission as the planning vehicle for a scheme whose impacts are so controversial. Given the multiple instances of significant heritage harm identified above and in the responses of other consultees, it is alarming to see so many of the most harmful elements, including the largest of the blocks and tower, have been submitted in outline as reserved matters. A site of this historic and strategic importance for the future of the city justifies a detailed planning application in order to adequately assess its heritage impact and its long-term viability for the site.
5. Finally, the demolition proposed is not sustainable development in environmental terms as defined in the overarching objectives of the NPPF (2023). The demolition proposed is extensive and would carry an extremely high embodied carbon footprint. This negative carbon cost contradicts Para 152 of the NPPF (2023), which sets out that the planning system should *'encourage the reuse of existing resources, including the conversion of existing buildings'*. It is clear from the planning documentation that inadequate consideration has been given to re-using the existing buildings on site. Such an approach would radically alter the acceptability of such a scheme when measured against this policy test and the associated legal precedents regarding embodied carbon impacts following the Secretary of State's landmark 2023 ruling over Marks & Spencer's Oxford Street store. The demolition approach proposed cannot therefore be considered *sustainable development* in NPPF terms.

Conclusion

For the reasons outlined above, SAVE objects to this planning application in its current form on heritage and sustainability grounds, and we call on the Local Planning Authority to refuse planning permission in favour of a scheme which takes the existing site and its history as the starting point for the area's sustainable long term regeneration.

I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

Yours sincerely,



Ben Dewfield-Oakley
Senior Conservation Officer, SAVE Britain's Heritage