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Development Control Division
Liverpool City Council
Municipal Buildings
Dale Street
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By email: Sheridan.Scott@liverpool.gov.uk

12 April 2011

Dear Sheridan Scott,

Application ref: 11PM/0603 **Proposal:** To demolish two storey dwellinghouses Wynnstay Street (all properties), Voelas Street (all properties), Rhiwlas Street (all properties except 16, 18, 20, 22, 24), Powis Street (all properties), Madryn Street (all properties except 17, 19, 21, 23, 25), Kinmel Street (all odd properties 1-59), High Park Street (128-132, 136-146, 176-188), Liverpool, L8

SAVE writes to register its objection to the proposed demolition these two storey dwellings in the Welsh Streets area of Liverpool.

SAVE challenges the negative Environmental Impact Assessment (EIA) screening opinion. It is clear that the environmental impacts of a clearance project of this scale are significant and various. It is also clear that in a situation such as this, local people and residents directly affected by the clearances should be met with the fullest consultation. Therefore, it is proper that a full EIA assessment is carried out and an application for the development of the site submitted.

These are the issues which we feel need to be looked at in the EIA assessment:

1. The proposed demolition is part of a wider project for redevelopment - as set out in the aims of the HMR funding. The effect of these wider works needs to be considered.
2. The use of natural resources in demolition and construction, including the loss of embodied energy needs to be considered. In a report commissioned by SAVE, conservation engineer Edward Morton of the Morton Partnership states that repair and renovation of these houses is 'not difficult' and that 'this approach must be more economic than demolishing and re-building, and of course will retain an interesting and viable group of Victorian terraces including Ringo Starr's birthplace in Madryn Street.' This report is available from the SAVE website.
3. The considerable pollution and noise impact both on the wider area and on the 19 houses within the site boundary which are to be retained must be considered. The recommendation in a report to the council that further ground investigation should take place for the proposed restoration of the site as a temporary open space does not appear to have been acted on.

4. Although a bat survey has been carried out, which identifies bat roost potential, dusk or dawn surveys have not been carried out.
5. The demolition of 3.5 hectares of housing will have a significant effect on the landscape as well as a considerable loss of material assets.
6. The demolition will have significant impacts on cultural heritage. The houses themselves were built by, and for, Welsh artisan builders who came to Liverpool in large numbers in the 19th century. Also, No.9 Madryn Street is the birthplace of Ringo Starr and a popular tourist attraction. The demolition will also have a dramatic impact on the adjacent conservation area and 15 listed buildings on Devonshire Road.
7. The loss of these buildings is permanent. Their replacement will have a significant impact on the environment.

The houses in the Welsh Streets area are generally in sound condition and are repairable (as confirmed in the attached report). They are part of a neighbourhood of distinct character which, despite the blight inflicted by the threat of demolition, still retains a strong sense of community. SAVE is at a loss to understand how these demolitions can be justified on any grounds. These buildings have a value both in monetary and townscape terms. Their loss would represent the waste of assets valued at tens of millions of pounds and result in permanent damage to the social and physical cohesion of this part of the city. These demolitions would serve only to further fragment and dislocate a community already suffering the effects of demolitions in neighbouring areas.

Similar clearances in the Liverpool area, such as those in Edge Hill and Bootle, have resulted in the eradication of entire neighbourhoods. Communities have been lost forever, civilised 19th-century street patterns wiped out, and the few surviving listed civic buildings and churches have been left isolated and meaningless in wastelands. SAVE also notes that the promised developments have in most cases not yet materialised and where they have, such as Harkbridge Drive near Edge Hill, the quality is extremely poor - with low grade building materials and landscaping.

SAVE has recently produced a report, *Reviving Britain's Terraces: Life after Pathfinder*, looking at how 19th-century terraced housing can be refurbished, adapted, remodelled and upgraded to a high level of energy efficiency. We have shown how this approach is cheaper and greener than demolition and redevelopment and how through investment terraced streets can become 'eco-communities' of the future. We urge your council to abandon these senseless demolition plans and redirect resources towards revitalising this building stock and healing the damage done by blight and neglect.

In light of these concerns we urge you, in the strongest terms, to refuse this application.

Yours sincerely,



William Palin
Secretary

Cc: Henry Owen-John, English Heritage; Chris Costello, Victorian Society