



Historic England

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Direct Dial: 0117 975 1308

Our ref: PA01176385

8 April 2022

Dear Ms Emery

Pre-application Advice

STROUD TEACHERS CENTRE INCLUDING RAILINGS TO YARD, CASTLE STREET, STROUD

Thank you for your emails of 7 and 14 March 2022, and the documents subsequently received. Please see below Historic England's comments on the proposal. We welcome this opportunity to advise.

Summary

Your Council seeks advice on the potential removal of a jack clock from the principal elevation of Blackboy House to the Museum in the Park. We understand this is being explored in response to public disquiet at the nature and associations of the jack figure.

Blackboy House is a 19th-century building, significant due to its architectural interest and its contribution to the history of Stroud. The building's significance also derives from the jack clock on its principal elevation. This form of clock is unusual, and is of historic and artistic interest in its own right. The building, which is listed at grade II, and its clock contribute to the character and appearance of the Top of the Town Conservation Area.

The removal of the clock would harm the significance of both Blackboy House and the Top of the Town conservation area. It would also cause considerable harm to the legibility of the jack clock as a complete entity.

In evaluating whether to develop a proposal to remove the clock, your Council must consider the policies in the National Planning Policy Framework, which require great weight to be given to conserving the significance of designated heritage assets, clear and convincing justification to be shown for harm to that significance, and such harm to be weighed against any public benefit. Your council must also consider the



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importance of the retention in situ and, if appropriate, explaining its historic and social context.

Although you have prepared a helpful statement about the figure and clock, this leaves questions which merit further consideration, to inform the application of these policies to this case. The Council will need to undertake further work to understand the significance of the clock and to consider its retention in situ, with appropriate interpretation.

Advice

Significance

i) Of Blackboy House

Black Boy House is an attractive building, originally built in 1844 as a girl's school. It is constructed in ashlar stone, and was designed in a Tudor style, with an asymmetric front elevation enlivened with the well-judged use of detailing such as string courses and hood moulds. Its boundary is marked by attractive fleur-de-lys topped railings.

Its intended asymmetry is evident across its principal elevation, with its westernmost bay presenting a steep gable to the road. The apex of this gable contains a prominent jack clock and jack figure, set in a niche, which is perhaps the most distinctive element of the building, and adds to its artistic interest.

The building is of historic interest, both as an example of mid-19th century architectural fashions and as illustrative of the evolution of the provision of education in the 19th-century. The school also contributes to our understanding of the changing character of Stroud in this period.

The clock is of historic interest in its own right, and this contributes to the historic interest of the building. It is a fine example of 18th-century craftsmanship and technology, dated to 1774 and attributed to John Miles of Stroud. It predates Blackboy House, and documentary evidence suggests that it was sited in Miles's watchmaker's shop on the High Street. Despite several relocations, the original mechanism is documented to be relatively well preserved, and contributes to our understanding of the evolution of horology.

It is also of interest as a jack clock, so named after the figure (or 'jack') that strikes a bell to mark the time. Such clocks are medieval in origin, and are relatively common across continental Europe. They are much rarer in England: this example appears to be one of roughly twenty that survive.

This historic interest is increased as the Stroud clock is a relatively late surviving



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example, and the form of jack varies from the other surviving examples, which often depict knights, soldiers or prominent citizens.

While the report that you produced to support the consultation advanced a number of theories for why the figure of a black boy was chosen, these have not been explored in detail. The report also did not provide much analysis of the historic and artistic context of the figure, and greater consideration needs to be given to this. The appearance of the jack also seems to have been influenced by later interventions.

ii) Of the Top of the Town Conservation Area

Blackboy House is in the Top of the Town Conservation Area, part of the historic core of Stroud. The area grew up organically, and its buildings vary in their age and their style, reflecting the historic evolution of the settlement. They are sited within a surviving historic settlement plan, which itself provides evidence of older layers of Stroud's history. This forms the foundation of the character and appearance of the conservation area, which is also the result of the quality and diversity of the building's architecture, and which gives the conservation area an eclectic and attractive appearance.

Blackboy House is one such architecturally appealing building, and it therefore contributes positively to the character and appearance of the conservation area. It is also one of a number of listed buildings within its boundary, listed at grade II.

Impact

The draft proposal seeks to remove the clock from its current position on the principal elevation of Blackboy House, and to relocate it to the Museum in the Park. This proposed relocation would result in harm to the significance of both Blackboy House and the Top of the Town Conservation Area.

i) Impact on Blackboy House

Most immediately, the removal of the clock would diminish the architectural interest of Blackboy House, as it is a distinctive element of the principal elevation of the listed building. The clock also provides the building with a degree of historic interest, linked to the rarity of its mechanism and form. Its removal would remove the ability to appreciate the clock in situ, as well as the ability to understand how it historically functioned.

However, while the removal of the clock would harm the significance of the building, much of its historic and architectural interest would survive. It would retain an architecturally satisfying composition and would still provide evidence of the evolution



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of Stroud and of the provision of education.

ii) Impact on the Top of the Town Conservation Area

The character and appearance of the Top of the Town Conservation Area is defined to a considerable degree by the contribution made by the architecturally interesting buildings within its boundary. As the draft proposal would diminish the architectural character of Blackboy House, it would, in turn, diminish its contribution to the streetscape of the conservation area. However, it is one of a large number of buildings that contribute to the character and appearance of the conservation area. The impact of its removal would therefore be localised, and limited.

Policy

Were the proposal to remove the clock from Blackboy House adopted by your council, this work would require listed building consent. The National Planning Policy Framework requires decision makers, when considering the impact of a proposal on a heritage asset, to be aware that such assets are an irreplaceable resource, and that they should be conserved in a manner appropriate to their significance (NPPF, 189). When considering this impact, decision makers must give great weight to the asset's conservation (NPPF, 199), and require clear and convincing justification for any harm (NPPF, 200). Where this harm would be "less than substantial", it should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (NPPF, 202).

The Framework also requires a decision maker, when considering any applications to remove or alter a historic statue, plaque, memorial or monument, to have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal (NPPF, 198).

The proposal would also need to be considered against the relevant legislation, with sections 16(2) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 being the most pertinent.

Position

The draft proposal to remove the clock from the principal elevation of Blackboy House, is motivated, as we understand it, by public disquiet at the jack figure's connection, direct or indirect, with slavery and colonialism and, perhaps, at the nature of the representation. This is evident in the response to the public consultation, but this rationale is not fully articulated in the information you have provided.

Historic England recognises that parts of our heritage may confront us with aspects of our past which we now question, which may be associated with injustice and which



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may be painful. It is right that as a society we respond to such associations, but we believe that this is best done, not by removal, but by preservation, and responding to them in ways which can explain their context and prompt reflection. Our position on this difficult subject can be found here:

<https://historicengland.org.uk/whats-new/statements/contested-heritage/>.

Our response to this draft proposal reflects this position, which is consistent with Government policy, as expressed in the Framework (particularly NPPF, 198).

The proposed removal would harm both the significance of the listed building in which the clock is located, and the character of the conservation area in which the building stands. It would also seriously damage the integrity of the clock itself. This harm would be “less than substantial” in the terminology of the NPPF.

The Framework requires that clear and convincing justification be provided for any harm to designated heritage assets (NPPF, 200). As the supporting rationale for the draft proposal you have provided us with the results of a public consultation on the future of the clock, carried out between July and September 2021, and a helpful report on its history and significance. While we appreciate that these documents do not yet form a justification in the sense required by the Framework, they do raise questions.

The report left a number of aspects of the clock’s history and context unexplored, and therefore did not provide as full an account of the clock as would be desirable, whether to inform public debate about its future or to support a possible application for its removal. For example, it contained no detailed assessment of the effect of later alterations, repairs and redecoration on the form and character of the figure. Equally, it also contained only limited, and qualified, consideration of the figure’s place within the wider context of 18th and 19th-century artistic representation. This consideration is needed in order that the figure can be properly understood in its broadest context.

This is not to suggest that the report is wrong to state that the figure must be understood in the context of the transatlantic slave trade and of empire, whether direct or indirect, but this is not its full context. As noted above, we recognise the need to respond to such potentially difficult heritage.

Missing from the information we have received is also any sustained consideration of approaches to conserving and responding to the figure, whether with interpretation or by way of a creative commission, in accordance with the Framework’s policy (NPPF, 198).

It is not clear whether consideration has been given to the potential benefits that might arise from full but nuanced interpretation of the figure, and how that might sensitively and successfully be achieved. Similarly, no consideration appears to have been given



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to whether a thoughtful artistic response might help to contextualise the figure, or to positively influence the way in which it is experienced. The limited understanding of the figure's historic appearance, and the effect of later alterations, has also meant that consideration has not been given to whether a sensitive scheme of conservation, alteration or restoration might have an impact on how it is experienced.

In the light of this analysis, Historic England advises your Council to give further thought to alternative options for the future of the clock, rather than adopting a proposal to remove it. This approach would be consistent with the policies of the Framework to which we have referred, and we have suggested areas of further research which could inform such an approach. We question whether the report provided, and the consultation informed by it, would provide a clear and convincing justification for the harm entailed to the significance of Blackboy House, and to the Top of the Town Conservation Area, by the clock's removal.

Should your council decide to proceed with the removal of the figure, as noted above, this would require listed building consent. Under the terms of Arrangements for Handling Heritage Applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021, any such application must be notified to Historic England.

Next Steps

Historic England welcomes further involvement in the development of proposals for the clock and is keen to work with the local planning authority to help secure a sensitive solution for the clock. In the immediate future, this might best be achieved through a meeting, perhaps on site, to discuss the clock and the potential options further. These further discussions would form part of our extended pre-application service, further details of which are available at:

<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/extended-pre-application-advice>

Yours sincerely

Historic England
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List of information on which the above advice is based



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Email of 7th March 2022

Review of Street or Building Names and Monuments in Stroud District: Response Data Analysis (received 14th March 2022)

Stroud District Council- Report on the Significance of Blackboy Clock and associated Statue, Blackboy House, Castle Street, Stroud (2021)



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