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Your Ref: 15/00974/FUL
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Dear Heather

15/00974/FUL and 15/00975/LBC Amendments to previous schemes (11/05359/FUL and 11/05360/LBC) for modification to internal layout and extension, window configuration, repairs and for the erection of a garden room extension; conversion of Wagon House to form ancillary accommodation and erection of garden shed at Newcastle Hall, Newcastle, Craven Arms, Shropshire, SY7 8QL

The Shropshire Hills AONB Partnership objects to these applications. The AONB Partnership believes that Newcastle Hall, a Grade II listed building, represents an important part of our built heritage and its character should be maintained. We believe the works set out in these applications represent an unnecessary and unacceptable alteration to the character of the buildings, and are especially concerned that these are retrospective applications where work damaging to the character of the buildings has already been carried out. Newcastle Hall is a sensitive and high quality heritage asset and any restoration should be done sensitively and in line with Listed Building guidelines and procedures. The buildings are a valuable feature in the village and in this part of the AONB, and highly valued locally, as apparent from other comments on the applications. The work set out in these applications would be harmful to the character of the designated heritage asset of the buildings, and to the local distinctiveness and character of the AONB landscape. They should be refused and the buildings reinstated as far as possible.

The following national and local policies applicable support the position that these applications should be refused:

Para 115 of the National Planning Policy Framework states that:

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. (emphasis added)

Para 132 of the National Planning Policy Framework states that:

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. (emphasis added)

Shropshire Council SAMDev Policy MD13: The Historic Environment states:

In accordance with Policies CS6 and CS17 and through applying the guidance in the Historic Environment SPD, Shropshire's heritage assets will be conserved, sympathetically enhanced and restored by:

- 1. Ensuring that proposals which are likely to either directly or indirectly affect the significance of a heritage asset, including its setting, are accompanied by a Heritage Assessment.*
- 2. Ensuring that the social or economic benefits of a development can be demonstrated to clearly outweigh any adverse effects on the significance of a heritage asset, or its setting, taking into account the degree of harm, the importance of the asset and any potential beneficial use of the asset. Where such proposals are permitted, measures to offset and record the loss of significance to the heritage asset and to advance understanding in a manner proportionate to the asset's importance and the level of impact, will be required.*
- 3. Encouraging development which delivers positive benefits to heritage assets, as identified within the Place Plans. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are recognised as being at risk or in poor condition. (emphasis added)*

We are concerned that no Heritage Assessment has been provided to accompany the application, which does not appear to be compliant with this policy or para 128 of NPPF.

Shropshire Hills AONB Management Plan 2014-19 (as approved by Shropshire Council) Policy for Joining up the Conservation Effort states:

Regulating Organisations

Organisations which regulate designated sites and features, environmental quality and amenity should make full use of available measures to ensure the highest standards appropriate to a nationally protected landscape are achieved in the AONB. A supportive and awareness-raising approach should be used with landowners wherever possible, but mechanisms for legal enforcement should be employed where necessary. (emphasis added)

AONB Management Plan Policy for Housing and Design of Development states:

All development should integrate well into the historic pattern and character of the surrounding built environment and landscape. Building style should reflect local tradition, and designs should be of a high standard in keeping with the nationally designated landscape. In line with Core Strategy policy CS6, particular regard should be paid to village and town design statements and Conservation Area Appraisals. Inappropriate design, layout and materials should be avoided. Innovative sustainable schemes are to be encouraged where they take account of the surrounding vernacular and the use of local materials.

Existing traditional buildings of architectural merit should be restored in preference to being replaced by new builds, and conservation advice should be sought. Agricultural buildings of merit should be retained in use or converted to live-work units where possible retaining their historic integrity and functional character, and only as a last resort converted into residential dwellings. (emphasis added)

Yours sincerely

Phil Holden
AONB Partnership Manager