

## **Objection to 81A Corve Street**

I object to this development (15/01251/FUL). The benefits that it might bring through a single extra dwelling and any employment gains during construction are far outweighed by the considerable damage to the conservation area and the setting of listed buildings as a result of insensitive design. The application should be rejected for the reasons given below.

### **Heritage and Conservation Impact**

This application lacks a heritage impact assessment. No application has been made for Listed Building Consent for partial demolition of the wall along Corve Street.

There are a number of listed buildings along Lower Corve Street. In the immediate vicinity of the development, the following are Grade II listed: 69, 70a, 71 & 71a, 72-74, 81 and 82 & 82A. These designated assets are interspersed with buildings that are not listed but should be considered non-designated heritage assets under [paragraph 41](#) of the national planning practice guidance.

### **National Planning Policy Framework**

The NPPF gives strong protection to heritage and conservation assets, whether designated or not.

**NPPF 128** says:

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting... As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.*

I can find no evidence that an assessment of impact on heritage assets has been conducted.

**NPPF 131** says:

*In determining planning applications, local planning authorities should take account of the... desirability of new development making a positive contribution to local character and distinctiveness.*

This suburban design of this house significantly detracts from local character and distinctiveness. The whole property will damage the historic landscape. The shutter garage is particularly out of place in the historic streetscape of lower Corve Street.

**NPPF 132** says:

*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.*

This proposal will cause less than significant harm to heritage assets and the conservation area. But the wordings of the NPPF and of the [Barnwell Manor](#) judgment make it clear that

even when the harm is less than substantial, “considerable importance and weight” must be given to impacts in planning decisions.

## **Heritage Guidance**

*Historic England Note 2 – Managing Significance in Decision-Taking in the Historic Environment* says at **Paragraph 4**: “The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.” There is no evidence that the applicant has made any steps to understand the relationship between this scheme and heritage assets along Lower Corve Street.

**Paragraph 6** says: “Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed.” I do not know if pre-application advice was taken but there is no evidence that the applicant has taken or applied expert advice.

**Paragraph 15** draws attention to curtilage structures, in this case the stone wall along Lower Corve Street. There has been no assessment of the historic significance of this wall and the impact of removal of much of it on the setting of heritage assets and the Ludlow Conservation Area.

**Paragraph 26** says that: “If there is any apparent conflict between the proposed development and the conservation of a heritage asset then the decision-maker might need to consider whether alternative means of delivering the development benefits could achieve a more sustainable result, before proceeding to weigh benefits against any harm.” Local residents and myself had understood that the plans were to be for a property set back into the garden, in front of the current greenhouse facing south. It is quite possible that an alternative application for a dwelling in this position could succeed without damaging the setting of heritage assets and the Conservation Area.

**Paragraph 53** lists the factors that help deliver good design in a heritage setting. This proposal fails to address most of the bullet points, including quality of materials – uPVC is one option given for the windows. It makes no acknowledgement to the general character and distinctiveness of the area and the impact on nearby heritage assets.

*Historic England Note 3 – Setting of Heritage Assets* gives at **Assessment Step 3** a list of the potential attributes that may impact on heritage assets. None of these has been addressed in the current application.

**Paragraph 28** says: “Options for reducing the harm arising from development may include the relocation of a development or its elements, changes to its design... Good design may reduce or remove the harm, or provide enhancement, and design quality may be the main consideration in determining the balance of harm and benefit.” Good design, including relocation of the dwelling within the plot, is exactly what is needed in this case. But the current application is poor design.

## **Core Strategy**

The Core Strategy gives strong protection to the heritage and historic character of Ludlow.

**CS3** states: Ludlow will provide a focus for development, whilst respecting its historic character.

**CS6** states: “Development will be designed to a high quality using sustainable design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness.” The policy goes on to state that Shropshire Council will ensure that development: “Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character.”

**CS17** reinforces this. It states that the council will ensure that all development: “Protects and enhances the diversity, high quality and local character of Shropshire’s natural, built and historic environment [and] contributes to local distinctiveness, having regard to the quality of Shropshire’s environment, including landscape, biodiversity and heritage assets.”

This application does not protect, conserve or enhance the high quality and local character of Ludlow’s historic environment as required by the core strategy. It is inappropriate in scale and design, and does not take into account the local context and character, or features which contribute to local character.

I agree with the comments on design and historic impact made by SC Conservation (Historic Environment) published on 21 April 2015.

## **Land Supply**

The agent for the development claims, without explanation, that Shropshire Council does not have the five year land supply for housing required by national planning rules ([NPPF 46](#)). The council is [very clear](#) that it does have sufficient housing land in the bank. Even if the council does not have an adequate land supply, planning applications must be judged against the National Planning Policy Framework taken as a whole ([NPPF 14](#)).

Against the framework as a whole, this proposal should be rejected.

## **Conclusion**

The benefits this proposed development will bring to Ludlow are limited to a single dwelling and any employment that might generate.

These benefits are modest and strongly outweighed by the harm caused to the setting of designated and non-designated heritage assets in Lower Corve Street and to the Ludlow Conservation Area. Considerable weight must be given to this harm under the NPPF and Listed Buildings Act 1990.

This application should be rejected.