



Historic England

SOUTH WEST OFFICE

Mr Robert Pedlar  
North Devon District Council  
Planning and Development Services  
Civic Centre, North Walk  
Barnstaple  
Devon  
EX31 1EA

Direct Dial: 0117 975 0725

Our ref: P00600355

17 July 2017

Dear Mr Pedlar

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LEE BAY HOTEL LEE ILFRACOMBE DEVON EX34 8LR  
Application No. 63167**

Thank you for your letter of 13 June 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Lee Bay is a unique conservation area stretching up the lush sheltered valley from the craggy inlet along the North Devon coast. The redevelopment of the hotel on the valley floor includes the demolition of the existing Arts and Crafts building and its replacement with three substantial blocks along the north- east edge of the plot with associated infrastructure and regeneration of the garden.

The Local Planning Authority (LPA) has a statutory requirement to pay **special attention** to the desirability of preserving or enhancing the character or appearance of the conservation area (S72 Planning (Listed Building and Conservation Area) Act 1990 (P(LBCA)Act 1990)). Historic England considers that the proposal will continue to result in less than substantial harm to the conservation area. This is due to the loss of the hotel building, which is a positive contributor to the conservation area, as well as the intensification of development due to the massing of the replacement buildings. A number of steps have been identified within the letter that should be undertaken to minimise the harmful impact. However, this will not avoid the harm that the proposal will cause and does not justify that the scheme is acceptable.

The main justification for the loss of the building and the quantum of development is the viability of the scheme. The optimum viable use does not relate to the most profitable solution but the one most compatible with the long term conservation of the asset (Planning Practise Guide). Therefore, the LPA need to robustly assess the



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viability of the proposals and ensure that the quantum of development proposed is the minimum necessary to secure the regeneration of the site. This assessment needs to be considered along with any public benefits offered by the scheme and should demonstrably outweigh the harm identified to the heritage assets affected (Para 134, National Planning Policy Framework (NPPF)).

Historic England remains concerned due to the impact of the development on the special character and appearance of the Lee Conservation Area.

### **Historic England Advice Significance**

Lee village nestles within the sheltered lush green combe above the secluded bay of the same name. The striking rocky coastline of the cove provides a picturesque backdrop to the conservation area, contributing to an isolated and rugged character that strongly reflects the cove's close association to the local maritime and smuggling traditions.

The village of Lee has a tightly developed core of incremental vernacular properties, whose positioning amongst the valley slopes within established gardens provides the settlement with an enclosed and sheltered domestic character.

Between the village core and the cove, the character changes to a much looser grain, predominantly consisting of moderate sized dwellings situated within substantial plots, intermixed with open farm land and bordered by the plantation of Winkle Wood, which provides a picturesque rural quality to the area.

The cove has a more intimate quality, with functional vernacular properties, anchored into the rugged landscape and clustered along the edge of the bay. The main exception to this is the Arts and Crafts Lee Bay Hotel, which is the subject of this application. Its prominent location, scale and massing, with the additional modern extension, means that the current building has a level of discord with the existing character and appearance of the Lee Conservation Area.

Although the existing building conflicts with aspects of the conservation area's character, it is a key focal point within the valley, retaining aesthetic value within the original structure, through its use of architectural features and detailing, as well as the sensitive use of complimentary materials. The site holds an illustrative role with the changing social and economic dynamics of Lee Bay: from its origins as a functioning harbour and agricultural landscape, when the site had been the location of a simple farmhouse, through to its evolution into a small isolated tourist destination and the subsequent growth in popularity in the mid-20<sup>th</sup> century, in which the hotel had an integral role. The hotel site is also likely to result in some communal value.

The surrounding curtilage to the hotel contributes significantly to the conservation



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area, covering much of the valley around the bay and stretching back towards the village. It remains largely open, although unmaintained, with some further interventions through the car parking and tennis courts, now largely lost within the garden's vegetation. The contribution of the site and its importance has been captured within the Design and Access Statement, which reads that the hotel site is "*arguably the most important area of landscaping within Lee as it occupies the majority of the valley floor within its grounds, whilst the former hotel building is one of the principle focal points in the valley.*" This relatively open nature of the site contributes to the character and appearance of the conservation area.

### Impact

The former hotel site in Lee Bay has been the subject of several planning applications related to its regeneration. The current scheme is similar to the scheme in 2016, for a residential development, that was refused. This scheme continues to result in the loss of the existing hotel and increases the density of development on the site through the addition of two new blocks.

Historic England appreciates the need for regeneration on this site due to its importance within the Lee Conservation Area. However, we would stress that any scheme needs to consider within its proposals the important contribution the existing building and surrounding curtilages makes to the character and appearance of the conservation area.

We remain disappointed that the application looks to demolish the hotel. The main conflict appears to be the density of development aspired to by the applicant and the constraints that are imposed by the property, through the existing configuration of the rooms, damp along the retaining wall and the provision of light into the back of the building at lower ground floor level. We maintain that the building could be converted and adapted to reflect some of its former glory, although this would result in the reduction in the number of units within the existing structure. Consequently, the loss of the hotel would result in harm to the character and appearance of the conservation area.

Notwithstanding our strong reservations to the loss of the hotel, the revisions to the design has taken steps to address the concerns raised by the positioning and design of the new buildings, through the reduction to the overall height of the focal structure (the hotel replacement), the use of a more contextual material palette as well as the variations in designs to try and emphasis the appearance of independent structures located within the lush gardens. However, the pressure in terms of the increase in units needed on the site means that we maintain our concerns regarding the overall increase in the visual density of development along the north-east side of the plot.

The southern block works more successfully in terms of its contextual approach as it sits independently from the focus of development along the cove and nestles below



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the road line due to the increase in topography along the road.

The relationship between the focal building and the central block is less comfortable due to the proximity and the scale of the central building. We appreciate that steps have been taken to open up the views further across the valley through the plot. However, due to the robust massing of the two buildings to satisfy the amount of development proposed and the modest distance separating them which is open due to the intervening car-park, it continues to create intensification of development within the plot, which will result in harm to the character and appearance of the conservation area.

There are some steps that should be taken to minimise the impact of the proposals further. This includes the modulation of the roof scape of the central building, by lowering the main bulk of the roof while retaining the gable details above it to create a greater sense of hierarchy within the built form and a more subservient appearance.

The car parks positioned between the three buildings are utilitarian designed features, which create open and stark environments that further exacerbate the visual appreciation of the new block's massing in views from the cove and on the approach along the road. We appreciate the need for car parking and that they provide important breaks and separation between the two buildings. However, these need to be integrated more successfully into the overall scheme, reinforcing the sense of independent structure within the garden setting rather than a suburban modern estate. We would stress the need for additional planting in and amongst the parking spaces, helping to break up the stark appearance of this area as well as creating a greater sense of depth to the garden and allowing them to further screen and break up the mass of the proposed buildings.

The scale and massing of the existing hotel structure is not a typical feature within the conservation area, therefore, the loss of the structure does not justify a replacement similar in size. Instead, any new proposals should reflect the more open context experienced within the rest of the transition between the village core and the cove, with modest dwellings set within large green gardens. Unfortunately the focal building remains a substantial structure reflecting the scale of the former hotel, minus the later extension. The LPA should be mindful of their statutory duties to preserve and enhance the character and appearance of the conservation area, which we would question whether the proposed scale of the new focal building achieves.

In terms of the approach sought with the design of the focal building, it has created a more unified appearance reflecting features within the existing location. The north-west elevation with its complicated configuration of projections, plains and balconies, could benefit from rationalisation. One of the easiest steps to take would be to turn the central projection into a chimney. This would help provide some solidity and rationality to the façade, reflecting the existing buildings within the area. At present, the



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projection contains two small windows and we are not convinced that the windows are a necessity within the design.

The other point to raise is the treatment of the elevation along the road side of the focal building. This needs to be rationalised to give it the impression of being a single entity like the garden elevation, rather than the appearance of terraces. The number of materials and their use to provide vertical emphasis as well as the provision of independent porches and the regular bay rhythm across the building need further consideration.

### Policy

Historic England considers that the proposals will still result in **harm** to the character and appearance of the Lee Conservation Area through the loss of the hotel building and the increase in development of the new scheme.

The LPA has a statutory requirement to pay **special attention** to the desirability of preserving or enhancing the character or appearance of the conservation area (s.72, 1990 Act).

Under Para 138, the loss of a building (or other element) which makes a positive contribution to the significance of a conservation area should be treated either as substantial harm or less than substantial harm under paragraphs 133 and 134 of the NPPF as appropriate. It needs to take into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole (para.138 NPPF). The hotel and the open quality of the site form a positive contribution in a prominent location within the Lee Conservation Area. In this instance, the harm has been identified as less than substantial, but that does not mean that this harm is acceptable.

Under the NPPF, Para 132, any heritage asset is irreplaceable, therefore any harm or loss to its significance should require *clear and convincing justification*. While under para 134, any harm needs to be outweighed by the public benefit of the scheme, including optimum viable use.

We have not been party to the viability aspects of the proposal but this forms the main justification for the current loss of the hotel as well as the overall quantum of development on the site. The viability of the scheme needs to be thoroughly examined by the local planning authority, to ensure that it secures the optimum viable use of the site. This does not mean the most profitable one but the one most compatible with the long term conservation of the asset and therefore, we would ask whether the quantum of development proposed is the minimum necessary to secure the regeneration of the site (Planning Practise Guidance). This needs to be considered along with any public benefits to consider whether this outweighs the harm caused to the significance of the heritage assets. If the assessment does not adequately demonstrate this, then the



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council should refuse the application.

**Position**

Historic England considers that although steps have been taken to address our concerns in terms of design, the scheme will result in harm to the character and appearance of the conservation area through the loss of the hotel and the intensification of development.

We would strongly advise that the points raised in our letter regarding changes to the scheme are implemented in order to mitigate some of the aspects of harm identified. It should be stressed that these steps will not avoid harm to the conservation area caused by the scheme and consequently, the council needs to consider that harm against Legislation and National Planning Policy. They should robustly consider the justification provided for the loss of the hotel, a positive contributor to the conservation area as well as the public benefits offered by the scheme, ensuring that they demonstrably outweigh the harm identified (Para 132 & 134).

Should the council approve the scheme, much of the success of a development on its site, will be down to the quality of material and detailing. We would stress the importance that any works here needs to be undertaken to the highest possible standard to ensure that the harm caused is not exacerbated. The details should therefore be conditioned accordingly, should you be minded to consider this approach.

**Recommendation**

Historic England has concerns regarding this application due to the harm to the conservation area. We would strongly advise that the steps identified in our letter are implemented. Although the harm is less than substantial, it does not mean that this is acceptable harm. The council needs to robustly test that the harm against the public benefit offered by the scheme, to ensure it outweighs the harm identified. This should include a thorough assessment of the viability of the scheme in order to secure the optimum viable use.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



**Rhiannon Rhys**

Inspector of Historic Buildings and Areas

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cc:  
Collette Hall, NDDC



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Direct Dial: 0117 975 0725

Our ref: P00600355

20 September 2017

Dear Mr Pedlar

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LEE BAY HOTEL LEE ILFRACOMBE DEVON EX34 8LR  
Application No. 63167**

Thank you for your letter of 21 August 2017 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

The amendments to the proposals for the former hotel site at Lee Bay relate largely to the landscaping scheme. Historic England is pleased to see that further steps have been taken to integrate the car-parking into the wider landscape plan for the rest of the site, although this does not mitigate the impact caused by the comprehensive urbanisation proposed to the north-east side of the site.

Historic England is still resistant to the loss of the existing Arts and Crafts building due to its contribution to the development of the conservation area and aesthetic prominence within views from the beach.

Notwithstanding a decision over the loss of the existing building, we would note that no further consideration has been given to address the uncomfortable relationship between the principal buildings and the central block, which was raised in our previous letter.

We note that the previously refused scheme (2016) had been for 20 units rather than 23, which is currently proposed. One way to address the intensification of development due to the large units and the utilitarian car-parking and the resulting uncomfortable relationship between the principal building and central block, would be to reduce the number of units to that of the former scheme. If the number of units could be reduced, then the central block, which contains 4 units could be omitted from the scheme and



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the additional unit, to make it up to 20, added to the larger block. This would provide the same amount of accommodation, securing what had been the optimum viable use for the site identified under a former scheme but allow for the much looser grain currently experienced within the conservation area. This will need to be considered under the planning balance, as it has been identified that the proposed scheme will result in less than substantial harm to the character and appearance of the idyllic Lee Conservation Area but an alternative scheme maybe able to provide the same public benefits while resulting in less harm to the historic environment.

We would again like to reiterate that in terms of justification, the scale and massing of the existing hotel structure is not a typical feature within the conservation area, therefore, the loss of the structure does not justify a replacement similar in size. There needs to be a contextual response with any new proposals reflecting the more open context experienced within the transitional element of the conservation area, between the village core and the cove, characterised by modest dwellings set within large green gardens. The current scheme does not achieve this loose grain with the intensification of development including units and parking that will be conspicuously urban in its design and character.

In terms of detail, further consideration needs to be given to the north-west elevation of the principal building, to help visual unify it with the rest of the proposed development and to address the north-western elevation, whose design approach conflicts with the concept of single entities set within large gardens.

The Local Planning Authority (LPA) has a statutory requirement to pay **special attention** to the desirability of preserving or enhancing the character or appearance of the conservation area (S72 Planning (Listed Building and Conservation Area) Act 1990 (P(LBCA)Act 1990)). Historic England considers that the proposal will continue to result in less than substantial harm to the conservation area. This is due to the loss of the hotel building, which is a positive contributor to the conservation area, as well as the intensification of development due to the massing of the replacement buildings and the introduction of utilitarian features of the car parks.

The main justification for the loss of the building and the quantum of development is the viability of the scheme. The optimum viable use does not relate to the most profitable solution but the one most compatible with the long term conservation of the asset (Planning Practise Guide). As the previous scheme had only 20 houses compared to the 23 currently being propose, the LPA need to robustly assess the viability of the proposals and ensure that the quantum of development is the minimum necessary to secure the regeneration of the site. This assessment needs to be considered along with any public benefits offered by the scheme and should demonstrably outweigh the harm identified to the heritage assets affected (Para 134, National Planning Policy Framework (NPPF)).





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**Recommendation**

Historic England remains concerned due to the impact of the development on the special character and appearance of the Lee Conservation Area. This advice should be considered as an addition to the previous correspondence provided.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

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**Rhiannon Rhys**

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Direct Dial: 0117 975 0725

Our ref: P00600355

23 April 2018

Dear Mr Pedlar

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LEE BAY HOTEL LEE ILFRACOMBE DEVON EX34 8LR  
Application No. 63167**

Thank you for your letter of 7 March 2018 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Historic England has identified Lee Bay as a unique conservation area stretching up the lush sheltered valley from the craggy inlet along the North Devon coast. The redevelopment of the hotel on the valley floor includes the demolition of the existing Arts and Crafts building, which contributes positively to the conservation area and its replacement with three substantial blocks along the north-east edge of the plot with associated infrastructure, car-parking and regeneration of the garden. There are concerns about the visual intensification of development within the location, which conflicts with the character and appearance of the conservation area.

The additional information has been submitted in response to Historic England's letter dated July 2017. We raised concerns over the original submission documents and the justification for the works, this included the density of development aspired to by the applicant and the constraints of the property, through the existing configuration of the rooms as well as its condition.

**Structural Report - Savills**

A preliminary structural survey has been produced, which sets out the condition of the building and estimates a potential cost for its refurbishment. The report identifies the walls as being in fair condition, while the roof structure appears to be sound, although with evidence of failures in the roof coverings. Although the site has been made secure, there has clearly been no maintenance carried out on the building since it



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closure. Broken windows, failing gutters, slipped tiles and perishing lead has allowed water to ingress into the property and resulted in collapsed ceilings and some evidence of rot, its extent has not been clearly identified. Although not ideal, these issues are not insurmountable and the site would benefit from an improved maintenance regime. If not addressed, this will expedite the cost of their repair. As the principle structure, although not fully assessed, appears to be in a reasonable condition, we consider that the building could be reused to provide accommodation. This could act as an enhancement to ensure its continued contribution to the character and appearance of the conservation area.

Historic England has identified that as the building is not listed, there are no controls over what works can be undertaken to its interior and although some consideration would be required over its external appearance, this could be accommodated within the site. The internal flexibility allows greater scope for change to fit the applications aspirations for the site. For example, the internal layout could be altered considerably to make it more suitable for residential use. This would address the concerns previously raised regarding configuration. In our view it has not been demonstrated that the building cannot be adapted within the additional supporting information.

The cost of full repair and renovation put forward in the application is significant. However, it is not clear how this compares to the cost associated with the demolition and construction of the proposed new buildings within the locality.

For example, one of the major outgoings identified in the refurbishment costs is the demolition of the 1960s structure. A similar, if not greater, cost would also be expected for the demolition of the earlier part of the building and would add additional expense to the wholesale redevelopment of the site. In terms of the repairs, although the conservation area provides some constraints with regards materials and quality of design, this would apply to both proposals and therefore, we would query the potential difference in expense.

We maintain that the building could be converted and adapted to reflect some of its former glory. The structural report does identify some concerns but we are not convinced that the associated costs would defer substantially from that of the new builds. Consequently, we would question the justification present through the associated costs compared to the current proposals.

### **Viability - Alder King**

Historic England has always maintained that the hotel was unusual in terms of the character and appearance of the conservation area. It is acknowledged that the design has looked to better reflect the existing character of the conservation area. But we maintain our concerns regarding the visual density of development along the north-east side of the plot, through the buildings, hard-landscaping and car-parks. There are still concerns over the visual intensification from the resulting quantum of development





and its justification is based largely on viability.

A summary of the Alder King report has been provided. The full report has been submitted to the council on a confidential basis. It is the Local Planning Authorities responsibility as part of their assessment of the proposals to robustly interrogate the viability assessment provided by the developer. If this expertise is not available within the council, then we would strongly encourage you to engage external independent advice to assist in this assessment.

Through that robust analysis it will establish whether there is sufficient justification for the harm caused to the heritage asset and whether the quantum of development proposed is the minimum necessary to secure the regeneration of the site (Para 132, NPPF). It will also need to demonstrably outweigh the harm caused to the conservation area as identified under Para 134, NPPF, which includes securing the assets optimum viable use as well as associated public benefits. The council should be mindful that in the Planning Practise Guide, optimum viable use *does not relate to the most profitable solution but the one most compatible with the long term conservation of the asset.*

### Position

The Local Planning Authority (LPA) has a statutory requirement to pay **special attention** to the desirability of preserving or enhancing the character or appearance of the conservation area (S72 Planning (Listed Building and Conservation Area) Act 1990 (P(LBCA)Act 1990)). Historic England considers that the proposal will continue to result in less than substantial harm to the conservation area. This is due to the loss of the hotel building, which is a positive contributor to the conservation area, as well as the intensification of development due to the massing of the replacement buildings. A number of steps have been identified in our previous letter that should be undertaken to minimise the harmful impact. However, this will not avoid the harm that the proposal will cause and does not justify that the scheme is acceptable.

The supporting documentation looks to provide some justification for the proposed loss of the building and the resulting quantum of development. The structural report establishes that the structure of the building is in a fair condition and resulting harm has largely been caused through a lack of maintenance. These issues are not insurmountable and could be addressed through the process of renovation. We have raised a number of queries over the associated costs as set out in the report as well as how they would compare to the redevelopment of the site as a whole. We are not convinced that the renovation would increase the cost significantly but that information would need to be presented to undertake further assessment.

In terms of viability and the quantum of development, it is the minimum necessary to secure the regeneration of the site. The council should utilised internal or external expertise to robustly interrogate this assessment. The viability of the scheme is a key





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aspect of the justification present for the works as well as presenting the optimum viable use for the site. Therefore, detailed and thorough assessment is required to be satisfied by the justification provided.

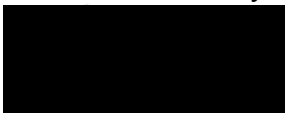
Therefore, we have reservations regarding the additional justification provided. The council needs to consider that harm against Legislation and National Planning Policy. They should robustly consider the justification provided for the loss of the hotel, a positive contributor to the conservation area as well as the public benefits offered by the scheme, ensuring that they demonstrably outweigh the harm identified (Para 132 & 134).

**Recommendation**

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



**Rhiannon Rhys**

Inspector of Historic Buildings and Areas

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22 August 2018

Dear Mr Pedlar

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**LEE BAY HOTEL LEE ILFRACOMBE DEVON EX34 8LR  
Application No. 63167**

Thank you for your letter of 13 June 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Historic England has had a long running engagement with the scheme for the redevelopment of the former hotel in the idyllic setting of Lee Bay. Historic England has now received additional information. We would like to make it clear this letter needs to be read in conjunction with our previous advice, which is still extant.

**Conversion Report**

Historic England has now reviewed the conversion options report. The building is not listed, so there is no restriction in the way in which the interior could be adapted to make positive use of the space. It is therefore, disappointing that greater opportunity was not taken to find inspiration to expose more of the existing structure or identified creative or innovative ways to provide the accommodation within the building, especially in those areas that have been omitted from the scheme due to light levels. There were also issues regarding damp of the retaining wall. This would need further investigation but we are not convinced that a solution could not be found to address these concerns.

The report has demonstrated that the building could be converted and we consider that with a more innovative approach, effective use of the underused space along the road side of the ground floor could be incorporated to create attractive apartments.

We note the comment regarding the continued decline of the property and would



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highlight that without maintenance this will continue to occur increasing the cost of refurbishment as set out in our previous response. Under Para 191, *evidence of deliberate neglect ... should not be taken into account in any decision*. We would encourage the applicant to undertake this maintenance, and help arrest the continued deterioration of the fabric.

**Viability**

We are pleased to see that NDDC has sought independent analysis on the viability assessment put forward by the applicant. This has identified that the quantum of development has not been justified in respect of viability.

The applicants have queried this and submitted additional information. We would support the council's approach so far and would urge you to continue to robustly assess the revised figures with assistance from your independent expertise. This aspect of the proposal is key as it will establish whether there is sufficient justification for the harm caused to the heritage asset and whether the quantum of development proposed is the minimum necessary to secure the regeneration of the site including the demolition of the existing structure (Para 132, NPPF). It will also need to demonstrably outweigh the harm caused to the conservation area as identified under Para 134, NPPF, which includes securing the assets optimum viable use as well as associated public benefits. The council should be mindful that in the Planning Practise Guide, optimum viable use *does not relate to the most profitable solution but the one most compatible with the long term conservation of the asset*.

**Recommendation**

The conversion options appraisal is useful, as it establishes that there is potential for development within the existing building. We maintain that innovative and creative solutions could help to address some of the concerns regarding light levels and the issues with dame. We would encourage the applicant to consider a potential of a conversion scheme further.

In terms of viability and the quantum of development, it is the minimum necessary to secure the regeneration of the site. The council should continue to robustly interrogate the assessment provided through their independent advisors. The viability of the scheme is a key aspect of the justification present for the works as well as presenting the optimum viable use for the site. Therefore, a detailed and thorough assessment is required to support the current justification.

We maintain our reservations regarding the justification provided following the outcome of the council's independent assessment which raises questions over the proposed quantum of development on the site. Furthermore, the conversion options report does demonstrate that the existing hotel could be retained.







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The council needs to the identified harm to the conservation area against Legislation and National Planning Policy. They should robustly consider the justification provided for the loss of the hotel, a positive contributor to the conservation area as well as the public benefits offered by the scheme, ensuring that they demonstrably outweigh the harm identified (Para 132 & 134).

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



**Rhiannon Rhys**

Inspector of Historic Buildings and Areas

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