

**From:** Joanne Needham <joanne.needham@spab.org.uk>

**Sent:** 17 May 2023 14:13

**To:** Morris, Amber <Amber.Morris@herefordshire.gov.uk>; Planning Enquiries <planning\_enquiries@herefordshire.gov.uk>

**Subject:** Re Application ref:231082/L - Middlebrook, Pembridge, Leominster, Herefordshire, HR6 9HL - SPAB Response

Dear Amber Morris,

**Application ref: 231082/L**

**Address: Middlebrook, Pembridge, Leominster, Herefordshire, HR6 9HL**

**Proposal: Proposal for internal and external alterations including: Removal of unsympathetic chimney stack; Installation of new windows/rooflights; Levelling of ground floor; Installation of new doors; Removal of existing walls; Removal of unsympathetic concrete footing and changes to layout/form.**

**Our ref: SPAB/JN/18355/23**

Thank you for notifying the SPAB of the above application. Having reviewed the documents available on your Council's website I now write with the Society's response.

The application seeks listed building consent for a number of works which appear to be a combination of proposed improvements to the accommodation and proposed repairs to the fabric and to reverse past inappropriate works. The Society warmly welcomes the proposition of repairs in particular but we regret to advise that we are unable to support them at this current time owing to a lack of sufficient information and justification. The application's lack of detail and justification means that we are also unable to support the proposed alterations. We expand on these points below.

A Heritage Impact Assessment & Design & Access Statement (March 2023, Berrys) has been included with the application and the document provides some good general context and observations. A good portion of the document is also devoted to discussing the actual proposals, while the significance of the building (and its constituent parts) is only briefly addressed, and that which is provided is not sufficient to understand the potential impact of the proposals on the building's significance and special interest. For example, and even at a minimum, there are no details of the age and significance of those parts directly affected by the proposals such as the stairs (to be demolished and relocated), the walls (to be demolished), the chimney breast (to be demolished), the area of walling at the rear (to be demolished to accommodate sliding doors), the existing floor/s (to be demolished and replaced) etc.

In the absence of a detailed Heritage Statement, the application immediately fails to fulfil the requirements of paragraph 194 of the National Planning Policy Framework (NPPF). It will also likely prevent your authority from meeting paragraph 195 of the NPPF. A detailed Heritage Statement (by a historic buildings specialist/buildings archaeologist) is required so that the significance of the building (and its constituent parts), and the impact of the proposals thereon, can be fully understood.

Based on the current information, it appears that the proposals will likely result in some harm to/loss of, the building's significance. While this harm/loss may indeed ultimately be 'less than substantial' as argued by the agent, there is presently no evidence to substantiate this claim owing to the absence of a detailed Heritage Statement and a lack of detail in relation to the proposed works. Further, 'less than substantial harm' is still a high test and 'great weight' should be given to the heritage 'asset's conservation' as required by Paragraph 199 of the NPPF.

The application also presently lacks the requisite 'clear and convincing justification' for any harm to, or loss of, the significance of the asset (as required by Paragraph 200 of the NPPF. This is due again to the absence of a sufficiently detailed Heritage Statement but also the lack of other supporting information and details which are required to fully understand the existing building, the nature and extent of the proposed works, and their potential impact. For example, the proposed works involve a number of structural elements/which have the potential to affect the building's structural integrity, but very little detail is provided. Similarly, there is little detail in terms of the existing fabric, its condition, and the specifications,

extent, and methods of proposed repairs - There are, for example, no details of how it is proposed to remove the existing concrete footing or what will replace it; no details of the extent of replacement of timber frame members, their replacement specification, and methods of repair; no details of the existing infill panels or what it is they are proposed to be replaced with etc. We therefore the planning authority that the following information is required for an application of this nature:

-A structural report (preferably undertaken by a conservation/CARE accredited engineer and with experience in historic timber frames) is provided. The CARE Register can be found here: [conservation accreditation register of engineers | Institution of Civil Engineers \(ICE\)](#)

-A condition survey of the existing timber frame (including existing details of infill panels). If not already done so, we would advise that it would be judicious to seek the advice of an experienced historic timber frame specialist. We advise that the repair approach should seek to retain as much historic fabric as possible and that any proposed works are justified by a technical need and not restoration.

-Unfortunately, the current drawings are not sufficient to understand the existing fabric and the proposed works. Detailed drawings are required - 'As Existing' and 'As Proposed' (including sections, details of the existing floor/s, foundations/footings. Existing and proposed materials should be fully specified/annotated on the drawings. A roof structure plan should also be provided so the impact of the proposed rooflight/s can be assessed).

-Specifications, materials, method statements for repairs to the timber frame, infill panels, sole plate.

With specific regard to the soleplate and its impact - paragraph 6.15 of the Heritage Impact Assessment & Design & Access Statement discusses the introduction of the concrete soleplate, stating that this - *'has altered some of the proportions of the house. This application will seek to remove this soleplate, which will restore the house to more appropriate proportions and will remove an unsympathetic alteration which has taken place. A further consideration regarding this is the displacement of the ground floor which has been caused by the installation of this soleplate. A portion of the work to remove the concrete soleplate will include the levelling of the ground floor, thereby reversing damage caused by unsympathetic installation and making the Site viable as a dwelling. Steel supports will be installed to accommodate ground floor levelling and to accommodate the removal of the concrete soleplate. These will not be visible and are deemed necessary to accommodate the Site's repair and to secure its viability as a dwelling.'* Could this statement be clarified please? What is meant by 'altered some of the proportions of the house.' and 'displacement of the ground floor'?

We also advise that it would be helpful to try (as far as possible) and establish what the original intention of the introduction of the existing 'concrete soleplate' was. Was it, for example, a well-meaning but misguided remedial measure to address a deteriorating (?) sole/cill plate and plinth wall below? Or a well-meaning but misguided attempt to at a more significant engineering intervention/underpinning?

If it is possible, and deemed appropriate, to remove the existing 'concrete soleplate', then repair of the historic timber sole/cill plate (which, from the photographs, still appears to be in situ), plus replacement of where it no longer exists, should be the first consideration, along with reinstatement of an appropriate plinth wall (presumably brick or stone to match what was originally there).

Lastly, if it would be helpful, the Society may be able to suggest names of suitable craftspeople who could advise on the condition of the timber frame and undertake the repairs. The applicant and/or their advisor(s) is/are welcome to contact the Society's free and confidential Technical Advice Line for further

details of possible suitable craftspeople. Any queries relating to the repair (or other questions) of the building could also be discussed this with one of the Society's Technical Advisors. (SPAB Technical Advice Line: 020 7456 0916. Weekdays 9.30am-12.30pm. Weblink: [SPAB Technical Advice Line](#)).

In light of the additional information and justification needed for the proposed works, we advise that the applicant considering withdrawing the existing application to enable the necessary documents and revisions to be prepared. This would also provide additional time for the proposals to be discussed with your Council's Conservation Officer which we strongly encourage. Should however, the application not be withdrawn and it remain in its current state, then we advise that it be refused.

We trust that this response is helpful. Please keep the Society informed of any developments in this case.

Regards,

Joanne Needham.

Joanne Needham

Casework Officer

(Usual working days: Mon, Tues, Wed)

The Society for the Protection of Ancient Buildings

37 Spital Square, London E1 6DY

Please send all notifications of listed building consent applications, faculty applications or requests for pre-application advice to [casework@jcnas.org.uk](mailto:casework@jcnas.org.uk)

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