

Dear Sir / Madam

I write in relation to the consultation on the draft Conservation Area Character Appraisal and Management Plan (October 2020) for Tonge Conservation Area.

Trenport Investments Ltd have an interest in the land to the west and north of the conservation area, specifically the parcels of land which falls within the proposed extension to the Conservation Area boundary at:

- Area TCA1 Land to the west of Tonge Castle; and
- Area TCA2 Land to the north of Tonge Castle.

These representations are supported by the attached Heritage Appraisal and should be read alongside this email.

Our representations have been prepared in accordance with the criteria set out in the statutory requirements for conservation area designation and management, the Planning (Listed Building and Conservation Areas) Act 1990, and the requirements amplified through the National Planning Policy Framework (June 2019), as well as guidance set out by Historic England.

Having analysed the criteria set out by the 1990 Act, as well as the NPPF and Historic England guidance, and applied it in this case to the proposed extensions to the conservation area, **we have serious concerns that the proposed extension to include area TCA2 is not appropriate.** This is because this parcel of land is not considered to hold sufficient architectural and historic interest (see attached appraisal) to be identified as an area "of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". To identify it as such would be contrary to the local planning authority's duty to ensure that an area justifies such status owing to special architectural or historic interest, as set out in paragraph 186 of the NPPF.

TCA2 should **not**, therefore, be included within an updated Tonge Conservation Area boundary.

There is no identification of built form upon the land or an assessment of how it might contribute to the significance of the area. There is also no specific mention of the character and appearance of the land which is enclosed within the boundary of TCA2. This is not surprising as we consider the importance of this parcel of land and its contribution to the significance of the Conservation Area to be extremely limited, except for the small portion of the Castle ditch which is located at its southern edge (TCA1) which we do not raise objection to its boundary extension. Our concern for the designation of TCA2, in light of Paragraph 186 of the NPPF, is further reinforced as a result.

On this basis, the boundary extension TCA2 is not justified and this CA boundary should not be extended.

I would be grateful of your confirmation that you have received these representations, and that they are being considered. If you have any queries, please do not hesitate to get in touch.

Many thanks  
Kind regards

Eilish

**Eilish Smeaton**  
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