

**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

Roland Mills  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
Ashford  
Kent  
TN23 1PL

PLANNING  
APPLICATION →

Your reference: 19/01476/AS  
Our reference: 154941

16<sup>th</sup> December 2019

Roland.mills@ashford.gov.uk

Dear Mr Mills,

**RE:** Newtown Railway Works, Ashford, Kent (including five Grade II listed structures);  
application for mixed-use development of site.

Thank you for notifying us of this scheme. We **object** and offer the following comments.

**Significance and harm**

The Newtown Works played an important and interesting role in the history of Ashford and South Eastern Railway, as well as railway heritage in general. This area of Ashford has undergone dramatic changes since the closure of Newtown with the clearance of works buildings in and around the site in question, yet this only increases the importance of those buildings which remain. Whilst we are content with the proposed treatment of the Acetylene Store, Paint Shop and Gatehouse which seem generally sympathetic, we have serious concerns about the proposed treatment of the Engine Shed and Locomotive Sheds which would have a detrimental impact on the significance of these listed buildings, as well as the site's.

The list description for the Locomotive erecting workshop notes that this building "is now the most completely surviving example of an early locomotive works with three subsequent development periods demonstrating best practice at the different dates", and it is asserted that it is for this reason that the building meets the criteria for listing. The Engine Shed is a similarly important structure on the site, and it is again suggested in the list description that this is an unusual survival given that the Engine sheds at Wolverton and Swindon, two key works, no longer remain. Apart from their historical significance, both sheds at Newtown also represent impressive architectural spaces with massive brick walls, beautifully constructed superimposed brick arches, and vast internal spaces. We therefore consider the removal of the roofs and the construction of two storey extensions and internal subdivisions to be a highly damaging proposal which shows little regard for the history and significance of both of these buildings. Although the roofs of these buildings were replaced in the 1950s, the form of the sheds remains mostly intact and the integrity of the buildings remains largely undamaged. We understand that there have been issues in finding viable uses for the site over the years,

Patron  
HRH The Duke of Gloucester KG, GCVO  
President  
Griff Rhys Jones  
Chair  
Professor Hilary Grainger

Vice Presidents  
Sir David Cannadine  
The Lord Howarth of Newport CBE  
Sir Simon Jenkins  
Fiona MacCarthy OBE

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and we accept the dramatic development of the rest of the site, yet we cannot accept a proposal which completely destroys the integrity of two key listed buildings on a site which should be considered as highly significant to the town.

### **Policy**

Based on the above points outlining the significance of these buildings, we consider the proposals to amount to substantial harm. The scale of the development of the site in general would be damaging to these buildings, obscuring their context as part of a wider works, and severing their link to other railway related buildings. Yet if this were the extent of the proposals, it could probably be seen as less than substantial harm to the significance of these buildings. The cumulative effect of this and the proposals to significantly extend the buildings, which would destroy their form, something which is integral to their significance, pushes the proposals into substantial harm.

Paragraph 195 of the NPPF states that;

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

The applicant has not adequately demonstrated that *all* of these stipulations have been met, and this substantial harm has therefore not been demonstrated.

### **Conclusion**

We fail to see the need for the level of harm proposed in the current scheme, and urge the council to demand an alternative approach for the conversion of the sheds which makes better use of the adaptable spaces in these buildings and their location close to the centre of this continually developing town.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Olivia Stockdale

**Conservation Adviser**



Olivia Stockdale  
Conservation Adviser  
Direct line 020 8747 5893  
olivia@victoriansociety.org.uk

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TN23 1PL

LISTED  
BUILDING  
CONSENT  
APPLICATION

→ Your reference: 19/01694/AS  
Our reference: 156005

15<sup>th</sup> January 2019

Roland.mills@ashford.gov.uk

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Olivia Stockdale

**Conservation Adviser**

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From: Olivia Stockdale  
Sent: 02 March 2020 15:25  
To: Roland Mills <[roland.mills@ashford.gov.uk](mailto:roland.mills@ashford.gov.uk)>  
Subject: 19/01694/AS

LISTED BUILDING CONSENT  
APPLICATION

Dear Mr Mills,

Thank you for consulting us on the revised proposals. The concerns raised in our previous letter are not addressed however, and so please can it be noted that our objections remain the same.



Kind regards,

Olivia Stockdale

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Olivia Stockdale  
Conservation Adviser  
**The Victorian Society**  
1 Priory Gardens  
London W4 1TT

