

## **1 Introduction and Acknowledgements**

- 1.1 My name is Jane Lesley Chamberlain. My qualifications are Bachelor of Science (Hons, Architectural Studies), Bachelor of Architecture from the University of Wales Cardiff. I am a registered architect and qualified as an Architect Accredited in Building Conservation. I am a Partner in Caroe & Partners, conservation architects. I have specialised in the conservation, repair, and reuse of historic buildings since 1989. I previously worked for Niall Phillips Associates, a conservation architect's practice in Bristol and later for Cadw Welsh Historic Monuments, working on the care of their own castles and other guardianship monuments.
- 1.2 Caroe & Partners was founded in 1884 by W.D. Caroe, a major figure in the Arts and Crafts movement. Caroe & Partners is a leading conservation architects' practice with specialist skills in the conservation, repair and adaption of historic buildings and sites. Clients include Cadw, English Heritage, the National Trust, local authorities, private clients, charitable trusts, cathedrals and churches.
- 1.3 I have worked on several projects where historic houses and scheduled ancient monuments, often set in historic landscapes, have been brought from a derelict and disused condition into a state of good repair and reuse. These include:-
- 1.3.1 Wick Court Arlingham. A seventeenth Century grade 2\* listed moated farmhouse and farm buildings, brought from a state of disrepair and disuse for Farms for City Children, a charity who now use the house as residential accommodation for visiting school children, where they learn about farming.
- 1.3.2 Highcliffe Castle Dorset. A large, grade 1 listed early nineteenth century country house, built in high gothic style in a derelict state and ruined by fire and vandalism. The Castle was repaired and brought back into use by its owners Christchurch Borough Council and The Friends of Highcliffe Castle, a group set up to safeguard the Castle and grounds.
- 1.3.3 Beechwood House Newport. A derelict and fire damaged grade 2 listed Victorian industrialists' house set in Beechwood Park, a Registered Landscape. The house was brought back into use as starter offices and workshops, with new workshops constructed on the site of demolished greenhouses.

- 1.3.4 The Cloister Project, St Davids Cathedral. The reuse of grade 1 listed St Mary's Hall as a refectory and the reconstruction of the Cloister, a Scheduled Ancient Monument, to form accommodation for Cathedral visitors and staff.
- 1.3.5 Saltford Brass Mill, Avon. Repairs to Abraham Derby's mill, a Scheduled Ancient Monument in private ownership, as a roofed structure, for use in part by the owner and in part by a Building Preservation Trust.
- 1.4 I have also worked on the repair and management of other important historic buildings, both as roofed and roofless ruins including Caerphilly Castle and Tintern Abbey.
- 1.5 Caroe & Partners were appointed to act as agents to the Ruperra Castle Preservation Trust, for the purposes of the Public Inquiry and I was instructed to advise on the merits of the Planning Application in September 2008. Caroe & Partners have previously worked for the Ruperra Conservation Trust on the repair of structures within Coed Craig Ruperra.
- 1.6 I have based my evidence upon my own experience of the level of exploration and detail required to successfully fit enabling development and reuse to the very specific requirements of individual, historically important sites.
- 1.7 I would like to thank Jan Talbot-Jones for permission to include her photographs in my proof of evidence.

## **2 Context and Summary of my evidence**

- 2.1 Other Expert Witnesses have explained why Ruperra Castle, its landscape and setting is of national importance, as recognised by the site's statutory protection. Appendix 1 (drawing DP003 illustrates the extent of designated historic and natural interest at and around Ruperra Castle.
- 2.2 The Ruperra Conservation Trust 61 hectares of woodland, known as Coed Craig Ruperra which forms part of both the essential setting of the Registered Park and the Registered Park itself and which contains drives and garden features associated with the Castle. The proximity of the Ruperra Conservation Trust's land to the Castle is shown in appendix 2 (drawing DP005).
- 2.3 Coed Craig Ruperra is open to the public and gives access to all features which form part of the historic landscape. The extent of public access within the woodland and around Ruperra Castle is shown in Appendix 3 (drawing DP004).
- 2.4 The purposes of my evidence are to show:-
- 2.4.1 That inadequate detail has been provided to illustrate the full, adverse impact of the development on the fabric and setting of the historic building and how this falls short of the usual level and quality of information required for obtaining consent to carry out development on such an important historic site.
- 2.4.2 That the extent of the enabling development would cause serious damage, on a site of such historic significance.
- 2.4.3 That the Appellant's driving reason for proposing the development – as enabling development to secure the long term repair and security of the Castle, outbuildings and historic landscape - cannot be proved to be viable in the short and long term.
- 2.4.4 That none of English Heritage's guidelines set out in their document 'Enabling Development and the Conservation of Significant Places' have been met.
- 2.4.5 That alternative options for securing the long term safety of the castle have not been explored.
- 2.4.6 That viable alternatives can be developed, to protect the Castle and landscape, without enabling development and with minimal

impact on the existing buildings and the historic and natural landscape.

- 2.4.7 That the Appellant has not illustrated any method for or willingness to address the urgent and serious concerns of deterioration and potential structural collapse of the Scheduled and listed buildings, to safeguard the heritage asset, which are not linked to the proposals which are the subject of the Public Inquiry.
- 2.4.8 That on balance, the alleged benefits of the proposed development are far outweighed by the disbenefits to the historic and natural asset and its setting and that the risk of an unsuccessful financial outcome is high, particularly in the current economic climate, making the proposals untenable in both the long and short term. By failing to explore other solutions to addressing the needs of the site, other than providing open market housing, the Appellant has failed to illustrate that the proposed development is the optimum, or even an acceptable, viable use for the site.

### 3 Scope and depth of Information submitted in support of the Planning Application and Public Inquiry

3.1 In reviewing this documentation, I have found a substantial lack of supporting evidence, to enable the physical and visual impact of the proposals to be properly evaluated.

#### 3.2 Submission of Planning Application in isolation

3.2.1 Planning Policy Wales (Welsh Assembly Government) 2002 states under its heading "Listed Buildings" clause 6.5.8:-

*"Applicants for **listed building consent** must be able to justify their proposals, showing why alteration or demolition of a listed building is desirable or necessary. It is generally preferable for both the applicant and the planning authority if related applications for planning permission and listed building consent are considered concurrently."*

3.2.2 In addition, English Heritage's document 'Enabling Development and the conservation of Significant Places' states in clause 3.3.1 that *"Applications for planning permission for enabling development concerning listed buildings, including changes of use, should normally be accompanied by any necessary applications for listed building consent, so that the impact on their special interest will be clear."* And in clause 3.3.3 that *"If the enabling development is in support of, or involves work to or on a scheduled ancient monument, application.....for scheduled monument consent should be made in parallel with the planning application."*

3.2.3 I consider that the failure to provide concurrent Listed Building Consent and Scheduled Ancient Monument consent applications for work to grade 2 and 2\* listed buildings and a landscape included in the Register of Landscapes, Parks and Gardens of Special Historic interest in Wales (CCW, Cadw, ICOMOS, UK) does not allow for sufficient explanation of the proposals to enable the quality of design and full impact of the proposals to be understood.

3.2.4 English Heritage's document advises that *"understanding the nature and significance of the place is fundamental to any decision about its future"* (Summary of section 4, page 8). The additional understanding of the site given by Professor John Gwynfor Jones, John Thorneycroft and Simon Bonvoisin (other expert witnesses for the Ruperra Castle Preservation Trust), is over and above that submitted on behalf of the Appellant and illustrates that the

adverse impact of the enabling development cannot have been fully appreciated without further research and investigation.

3.2.5 On a site of such significance and in proposing such extensive intervention, I would have expected a conservation management plan to have been prepared, to inform the design decisions made. Whilst the Environmental Statement prepared on behalf of the Appellant goes some way towards this, some key aspects which do not appear to be addressed include:-

1. An appraisal of the designed relationships between the Castle and its landscape and the design quality of the Castle and outbuildings themselves. This would have generated other more innovative approaches to the design of new build elements, for example by building within large walled enclosures, which one would pass through, to move around the site, to reflect the scale and layout of the original landscape elements, rather than simply mirroring the design of the outbuildings and separating small units of parking with short lengths of hedging.
2. A programme to completion of works on site, identifying how works would be planned to allow for creating safe access for emergency propping and repair, clearance of the archaeological debris field, working around bats and newts and the lead-in time required to obtain licences to disturb protected species, the implementation of an archaeological watching brief for excavations, detailed recording of architectural features such as iron window casements and stone mouldings, to inform repair etc.

### 3.3 Detailed design

3.3.1 Section 4.2 of the Appellant Hearing Statement 11 August 2008, third paragraph, states "*The emphasis has been placed on restoring the Castle to as faithful an interpretation of its key listed attributes as possible*". I consider that by concentrating on the detail of the proposals, in terms of massing and architectural detail, the Appellant's advisors have approached design criteria as if the site was a typical, suburban housing site in a conservation area, and that the far more important, wider picture of the impact of the development on such a special, historic site and natural environment has been lost sight of.

3.3.2 The Appellant Hearing Statement describes in detail how the proposed scheme has evolved and that "*Negotiations and*

*discussions have taken place to arrive at detailed design proposals which safeguard the architecturally and historic assets of the dominant buildings on the site, and also resite and reform the mass and design of specific and new build elements .....*" (section 4.2 paragraph 2) and to comply with Planning Policy Wales and Technical Advice Note 12 "Design" (paragraph 3).

- 3.3.3 Whilst I would agree that the massing of the buildings has been improved by these revisions and consultations, I would argue that the proposals, presented as basic elevations of each individual building block, fail to illustrate a good quality of design and detailing. The drawings do not indicate the precise extent of intervention, for example to the remaining stable block interiors, and so an accurate appraisal of design quality as set out in TAN 12 cannot be made. No specification or detailed description of proposed materials is provided, which seriously hinders any assessment of the quality of detailed design Appendix 5 (drawing DP007) illustrates the extent to which new buildings congest the setting of the Castle to the north and west elevations. Small scale devices such as hedges have been used to screen small blocks of parking, rather than breaking the site into large walled enclosures. As previously suggested, this might be more in keeping with the overall scale of the castle and landscape, than by merely repeating the form of the existing outbuildings, albeit without the large open spaces currently existing between each building block. Coloured tracings of the site showing massing and subdivision as existing and as proposed are attached at Appendix 5.
- 3.3.4 A clear example of how further detailed design would reveal the real impact of the proposals on the historic landscape would be by carrying out a detailed topographic survey and overlaying this and historic plans of the landscape, terraces and enclosures over the proposed layout. This additional process would reveal the extent of disturbance of the Stuart and later landscapes which would occur through leveling of the site before the construction of foundations, roads, parking and drainage. The level of disturbance does not simply lie within obvious areas such as the new ponds to the south of the Castle, which clearly have an impact on the lost Stuart landscape.
- 3.3.5 Notwithstanding my above comments, the quality of design is secondary to the requirement to accurately substantiate the need for the level of enabling development proposed, regardless of its quality.

#### 4 Enabling Development

##### 4.1 Measuring the proposals against required guidelines for enabling development

4.1.1 Section 4.1 "the Case for Enabling Development" of the Rule 6 Statement of Case dated 30 September 2008, prepared on behalf of the Appellant, advised that *"The appellant will make a robust defence of his case that the proposals, subject of this appeal, constitute enabling development as defined by English Heritage's publication "Enabling Development and the Conservation of Heritage Assets" (June 1999)".*

4.1.2 In their letter to Caerphilly County Borough Council of 29 September 2006 (Appendix 7 Listed as IP Reps Case 2 under Third party evidence included in the Planning Portal, Planning Casework Service), Cadw state:- *"Further advice is contained in English Heritage's advisory booklet Enabling Development and the Conservation of Heritage Assets which provides best practice guidance, of equal application to Wales."*

4.1.3 English Heritage' guidance is therefore agreed by all parties to be of prime importance in testing the appropriateness of the proposals.

##### 4.2 Why I consider that the proposals do not meet English Heritage's guidelines for enabling development

4.2.1 I would like to illustrate why I consider that the proposals fail to meet these guidelines, by referring in turn to each of the criteria set out by English Heritage on page 5 of their Policy for enabling development:-

##### 4.3 **a. "it will not materially harm the heritage values of the place or its setting"**

4.3.1 Proofs of evidence by Professor John Gwynfor Jones, John Thorneycroft and Simon Bonvoisin clearly illustrate that Ruperra Castle, its landscape and setting are of national significance and that Simon Bonvoisin's and John Thorneycroft's proofs illustrate the significant and harmful impact of the proposals.



- 4.4 **b** *“it avoids detrimental fragmentation of management of the place”*
- 4.4.1 Owen Banks' Planning and Development Ltd's Rule 6 Statement of Case (paragraph 4.5) advises that *“the retention of the Castle under one comprehensive development proposal will avoid fragmentation of the management of the heritage asset”*. Whilst significant sites in multiple occupation can be successfully managed (for example the Royal Crescent, Bath) I would argue that the rigorous management needed in this case to control matters which would affect either building fabric and setting, such as external lighting, garden landscaping or the need for internal redecoration using appropriately breathable finishes would be difficult to enforce and has not been seen to be included as part of cost planning for future management.
- 4.4.2 In addition, there is no contingency plan describing how maintenance would be funded, if full occupancy of all dwellings is not maintained. There is no detail of how holistic management of the site will be guaranteed in the long term. There is no analysis of the high financial and long term risk involved in the proposed enabling development, which would be made at a very high and irreversible cost to the significance and ambience of the site, should the development proceed.
- 4.5 **c** *“it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose”*
- 4.5.1 The Financial Appraisal submitted in support of the enabling development by Franklin Andrews, does not extend cost planning beyond the point of completion of the construction of the enabling development. Neither is it explained over what period of time the repair and enabling work is expected to be carried out and phased, other than a construction period of 60 months, to accommodate emergency structural works, mitigating works for protected species, archaeological investigation before and during works and the time required to obtain and discharge conditions to Planning, Listed Building, Scheduled Ancient Monument and Building Regulations approvals. There is no separately costed maintenance plan and therefore no description of how the long term future of the Castle and site would be secured. The risks of financial failure of extensive and high cost proposals are high. There

is no fall-back position and further valuable time will have been lost, in achieving the stated aim of safeguarding the highly vulnerable historic fabric, if the proposed development stalls at a later stage.

- 4.5.2 The financial appraisal does not include any explanation of how long term maintenance requirements will be met. For example, the regular repair and redecoration of rainwater goods and cast iron windows, on such a high structure, will have a significant maintenance implication. In the summary to section 4 (page 8) of their guidance, English Heritage state *"A solution that does not provide the means of meeting recurrent costs that cannot be generated by the place itself is no solution at all"*.
- 4.5.3 In his proof of evidence, Simon Bonvoisin illustrates that the development of the site from the current two dwellings to the proposed 18 new dwellings and 23 apartments is not sympathetic to the historic and natural significance of the site.
- 4.6 ***d it is necessary to resolve problems arising from the inherent needs of the place, rather than the circumstances of the present owner, or the purchase price paid.***
- 4.6.1 I regard the most pressing needs at Ruperra Castle to be the execution of emergency works to secure the deteriorating fabric of the Scheduled and Listed buildings. The Castle's north west tower (no. 4) was first identified as being in poor condition by Giffords in 1997. In 2001, Bradley Associates Consulting Civil and Structural Engineers also identified this tower as being *"in danger of imminent collapse in a similar manner as tower 1 (south east)"*. The south east tower collapsed in 1982. Photographs included at appendix 6 illustrate the extremely dangerous and precarious nature of this tower and other parts of the Castle's fabric. More recently, the listed outbuildings have been the subject of a fire and lead theft, as is also illustrated. Other than securing the roof of the generator house with tarpaulins, I am not aware of any action having been taken to carry out emergency work or maintain any of the buildings on the site, since purchase by Barakat Ruperra Ltd in 1998, to safeguard the asset.
- 4.6.2 Once emergency work is in place, as described in evidence given by John Thorneycroft, a further urgent need, to address current threats to the site's significance, must be to carry out the least amount of work necessary to properly secure the fabric of the Castle for the medium and long term. This would involve structural

repair, reroofing in some form and repair of the external envelope, whilst planning and carrying out works to accommodate the bats which inhabit the generator house and Castle basement.

4.6.3 I consider the third urgent need of the site to be the formation of a full understanding of its significance, without which proposals for change cannot be assessed.

4.6.4 I consider that the extensive enabling development proposed does not respond to these inherent needs, but to an assumption that full repair and restoration for commercial housing is the only option for securing the long term and successful survival of the buildings.

4.6.5 In his proof of evidence, Trevor Groom has advised that the cost of carrying out works to these ends would constitute a total development cost in the order of over £2,500,000 higher than the Appellant's costings of £14,832,014. Trevor Groom's evidence illustrates that the Appellant's proposals, even with their high impact on the sensitive site, would be unviable and realise a loss, unless grant aid is provided.

4.7 ***e sufficient subsidy is not available from any other source***

4.7.1 Costings included in the appendices to the Appellant Hearing Statement dated 11 August 2008 do not appear to make reference to seeing forms of subsidy other than enabling development for open market housing. Public funding for developing the site for private residential use with no plans presented for public access is bound to be limited. In section 5 of my proof of evidence I illustrate that funding targeted on those works and costs which are the minimum necessary to secure the fabric and landscape and maximise public access and benefit have the potential to attract funding from a wide range of sources, not investigated by the Appellant.

4.7.2 By failing to explore other options for securing the Castle, the Appellant has failed to meet this criterion for enabling development.

4.8 ***f it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests***

4.8.1 In his proof of evidence, Trevor Groom illustrates that the costings presented on behalf of the Appellant do not accurately allow for the true level of costs which are likely to be encountered in repairing the buildings and carrying out the development. The amount of enabling development proposed - for a solution based upon the provision of private housing - therefore falls short of the amount required to safeguard the site and so is not financially viable. The financial appraisal prepared on behalf of the Appellant is silent on the quality of specification allowed for and includes no land value, in calculating development costs, also indicating that the suggested development costs are low

4.8.2 Given that the type and level of enabling development proposed does not stand up to financial scrutiny, the solution proposed cannot illustrate that minimum harm is caused to other public interests.

4.9 ***g the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies***

4.9.1 The Appellant Hearing Statement measures disbenefit in terms of not providing for any wholesale restoration of the Grounds (Section 5.11 paragraph 2). Simon Bonvoisin has illustrated that the proposals significantly affect the quality of the designed and natural landscape as currently exists and would preclude future restoration of the historic grounds. I would argue that public benefit should be positive – increased access, works to safeguard the long term security of fabric, designed landscape and natural habitat, not simply to ameliorate the impact of compromises which result entirely from the proposed enabling development.

## **5 The need for an options appraisal**

5.1 Item 6.4.6 of Planning Policy Wales (Welsh Assembly Government) 2002 states that:- *“There should be a general presumption in favour of the preservation of listed buildings.....The aim should be to identify the optimum viable use that is compatible with the character and setting of an historic building.”* I would argue that noalterantive use other than market value housing has been explored by the Appellant and that optimum use cannot therefore be demonstrated.

- 5.2 In its overview to section 4 (page 9) of its document on enabling development, English Heritage advises that “*Market testing is normally the first step in establishing the need for subsidy....(through enabling development)*”. I understand that the two existing dwellings at the Castle may have been put for sale on the open market, but withdrawn before sale in 2005. Otherwise, the only evidence of testing for alternative use put forward by the Appellant (Section 3.2 subsection 3 paragraph 2 of the Environmental Statement) is that “*Caerphilly County Borough Council has confirmed that prior to 1998, it was approached by a number of individuals, companies and pension trusts who looked at the property with a view to restoring it.....None of these proposals went beyond the very initial discussion stage*”. Further, paragraph 1 of section 3.2 of the Appellant’s statement advises “*there are three options available to any landowner faced with buildings in such a structural condition.....do nothing..... the demolition of the entire site....and...complete restoration*”. This is explored slightly further in John Pugh’s Conservation Statement and Methodology, prepared on behalf of the Appellant, which on the second page considers the options of “*A The retention of the exterior fabric with the internal structure being...completely new...and B The retention of all of the existing fabric with alterations and minor interventions with modern techniques and interventions*”. These options oversimplify the many levels of conservation and repair which can be carried out, which fall between conserving as an unroofed ruin and complete restoration. Options for preserving and restoring the historic landscape are not offered for consideration.
- 5.3 As I set out in section 4.6 above, the minimum level of intervention which would secure the Castle falls far short of complete restoration. In his evidence, John Thorneycroft has explained how reroofing – if necessary with a ‘temporary’ roof – and works to weatherproof the Castle exterior can safeguard the survival of the fabric for the medium and long term. By looking at the minimum scope of work required, the cost of safeguarding the Castle and landscape for the future can be reduced, without precluding the restoration of missing fabric and features in the future. By thus reducing the need for enabling development, irreversible development work which would damage the asset and severely compromise future restoration could be avoided.
- 5.4 In 1998, and whilst unknown to them that Barakat Ruperra Ltd was arranging to buy the Castle, the Ruperra Castle Preservation Trust obtained grant aid for and commissioned a feasibility study on

options for reuse, by Donald Insall Associates Ltd. Whilst it was not put to further use as the Castle was in new ownership, the study gives a far wider exploration of possible use than the scheme for private housing proposed by the Appellant. Alternative proposals have never been presented for consideration by the Appellant.

5.5 Further to this, and in response to the Appellant's application for planning consent for housing, the Ruperra Castle Preservation Trust sought advice on the feasibility of reuse for dwellings from the Spitalfield Trust, a building preservation trust specialising in the sympathetic conversion of historic buildings for new use. With the benefit of charitable status and the clear aim to secure the site by redevelopment but without the need for developer's profit, the Trust advised that reuse for dwellings was not financially viable.

5.6 In my opinion, the failure of the Appellant's proposals to meet the requirements for enabling development leads to the urgent need to look again for alternative uses. In her proof of evidence, Pat Jones Jenkins states that the Ruperra Castle Preservation Trust would be pleased to actively work with any party to secure a satisfactory and safe future for the Castle and landscape. The need for subsidy – through grant aid and not necessarily enabling development – would appear to be inevitable, given the scale of costs for repair, as indicated in the costings presented by Trevor Groom. To qualify for such a large subsidy, public benefit must be maximised, to include excellent access and other benefits, beyond the basic repair of historic fabric. I would like to illustrate that other options for reuse exist, which would be supported by the Ruperra Castle Preservation Trust, and which warrant further exploration.

5.7 Option A

5.7.1 The ideal outcome for the Ruperra Castle Preservation Trust, would be for the Castle and immediate landscape to be reunited with Coed Craig Ruperra (the Ruperra Conservation Trust's woodland), with the habitat for protected species protected and public access created to the whole, combined landscape, all without new build enabling development, to avoid compromising the landscape and setting.

5.7.2 Examples of roofed but internally incomplete buildings which are opened to the public include Woodchester Mansion, Lulworth, Caerphilly and Highcliffe Castles, Seaton Delaval and the Great House at Alton Towers. At some of these sites, further work to restore

interiors and increase use has progressed in increments, as and when affordable and to suit the requirements of users and owners.

5.7.3 This option for reuse would provide excellent public access, be in line with Caerphilly County Borough Council's policies for public access to open space and therefore be likely to attract funding. Public benefit would nevertheless need to be maximised further, to provide additional funding sources and to enable the site to be properly maintained in the long term. The processes intrinsic to the repair of the Scheduled and Listed buildings, providing public access to the landscape and the managing of the whole site including the woodland of Coed Craig Ruperra, present further opportunities themselves – of training, for apprentices to learn traditional building skills such as stonemasonry, carpentry, joinery and leadwork, and in horticultural, woodland and parkland management skills. This would open up further funding sources and by offering training, form the basis of a longer term management plan.

5.7.4 Another opportunity for income generation presented by the Castle is for the reuse of the outbuildings. Accommodation for the bats and for mess and teaching facilities would have first call upon the outbuildings, but sympathetic use, by reusing the stables as stables, or as holiday lets for example, would generate modest revenue without excessive outlay, whilst being compatible with the natural and designed landscape, the Castle and its setting.

5.7.5 Appendix 8 (drawing DP001) illustrates the basis for this option for reuse.

## 5.8 Option B

5.8.1 An alternative but less satisfactory approach to reuse would be to minimise costs by putting only the Scheduled Ancient Monument into public or charitable control, to increase public benefit – ie access – in order to increase the availability of funding. Carrying out the minimum necessary repair of the castle – emergency repair, reroofing and external envelope repairs – could again provide training in traditional construction skills. Another key concern of the Ruperra Castle Preservation Trust – the safeguarding of the habitats for bats and newts – could be included by linking the repair and use of the generator block with the repair of the Castle – to provide accommodation for the bats and mess and meeting facilities for the Trust or other site manager. Enough space for access, temporary

buildings and parking would need to be put under the control of the charitable trust managing the Castle. The remainder of the site – including the other outbuildings – could remain as existing, namely as two dwellings, set in the landscape. Opportunities for fundraising and generation are greatly restricted, for option B.

5.8.2 Appendix 9 (drawing DP002) illustrates this option.

5.8.3 Examples of buildings and sites operated in shared use by building owners and charitable trusts include Highcliffe Castle and Saltford Brass Mill.

## **6. Securing a safe future for Ruperra Castle, its landscape and setting**

6.1 The Public Inquiry into the proposed development at Ruperra Castle has provided the Ruperra Castle Preservation Trust and its Expert Witnesses with the opportunity to explain the importance of the Castle, landscape and setting, to illustrate that the Appellant's proposals would be highly damaging and would not secure the safe future of the site, and that other options for reuse exist and must be explored as a matter of urgency, to bring decades of neglect to a prompt end, to assure long term safekeeping, before collapse of the north west tower and further decay takes place.