

Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/01871 & PL/2023/01557**

Rebuilding properties known as Mill House to create 5 houses (3 already existing and approved) and 5 no. flats with internal courtyard area for amenity
Mill House, 58 Stallard Street, Trowbridge

Please find following comments in respect of the above application(s).

Recommendations:

☐	No Comment
☐	Support
☒	Support in principle subject to amendment (set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 201-3 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 197 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site: the applications relate to Mill House, an early C19 house erected by the wealthy owners of the neighbouring Clarks Mill. The house is listed at grade II* and the workshop to the rear, which was previously thought to be of earlier date, is listed at grade II. Further research has shown that the bomb damage suffered by the building during the war resulted in a far greater level of loss and rebuilding than previously acknowledged. An additional bay to the left hand end of the main front range was lost and not rebuilt (the remaining structure being simply made good with a plain gable), as was a further range projecting to the rear. The whole of the southern rear range which was previously thought to date from the C18 seems to have been rebuilt using historic fabric after the war and the other single storey structures are of post war date and modern design and fabric.

Proposal: the remaining house and rear range have previously been granted consent for conversion to 3 dwellings (a single dwelling in the main house and two in the rear wing) whilst a fourth dwelling was proposed in the post war single storey extensions. The current application proposes the demolition of the post-war single storey workshops and the construction of new buildings (envisaged as a recreation of the historic structures) on the footprint of the historic ranges which were lost to wartime bomb damage. The proposed new structures would provide an additional 2 houses and 5 flats and it is suggested that they will assist towards the viability of the main scheme to restore and convert the remaining historic fabric of the house.

Issues: impact on fabric and settings of the grade II* listed house and grade II rear buildings, impact on the setting of neighbouring listed buildings including the Mill, Beaufort Mansions and Handle House. Impact on the conservation area.

Assessment: Paragraph 194 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, the applications are accompanied by a "Design, Access, Planning and Heritage Statement" which provides limited detailed analysis of the existing main range and two storey rear wing but it is understood that the proposals for these areas remain the same as previous scheme which have already been granted approval. The statement, which focuses on a relatively brief justification for the new build element, therefore provides sufficient information to understand the impact of the new proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place. In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have

significant aesthetic and architectural interest and which contribute to the character of the conservation area.

Evidence has been provided in respect of the pre-war presence of significant further areas of the building. Two historic photos have been provided and there is evidence remaining on site in the form of the remnants of footing for the previous buildings. Advice within Historic England's Advice Note 2 – Making changes to Heritage Assets notes the following in respect of proposals for the restoration of previously lost elements from a building:

24. Restoration is likely to be acceptable if:

- The significance of the elements that would be restored decisively outweighs the significance of those that would be lost,
- The work proposed is justified by compelling evidence of the evolution of the heritage asset and is executed in accordance with that evidence,
- The form in which the heritage asset currently exists is not the result of a historically-significant event,
- The work proposed respects previous forms of the heritage asset,
- No archaeological interest is lost if the restoration work could later be confused with the original fabric,
- The maintenance implications of the proposed restoration are considered to be sustainable.

The current scheme appears to have the potential to meet these requirements and, as a result, there is no objection in principle to the proposed recreation of the lost ranges to create a courtyard layout. It is noted and welcomed that the revenue from the additional houses can assist in the viability of the scheme and contribute towards the repair of the historic range.

Unfortunately, however, there is at present limited detailed design information for the new build other than the rather small-scale elevations and these suggest that the design quality of the scheme is currently insufficient for an addition of this scale in such a sensitive context. We note Historic England's comments and agree with their suggestions of where further consideration is required. In particular, the substantial new block to the rear appears unacceptable in terms of its design quality for an extension of this scale – we note the mean eaves detail, poorly resolved junction with the parapet of the north return to the main range, out of proportion chimney stack (which does not seem to be reflected in any structure in the floors below and therefore is presumably not to be an authentic chimney structure). A poor-quality pastiche would detract from and diminish the significance of the remaining historic section of the building, as well as the settings of neighbouring buildings. Further work within an amended scheme is therefore required before the application can be recommended for approval. The design needs to be improved and a greater level of detail should be provided within the revised submission to illustrate the architectural detailing and construction of the new structures, including proposals for materials. These details should be informed and justified by reference to the historic evidence which has been gathered during research.

With regard to the existing historic range of the building – some time has elapsed since the original consent was granted and the condition has deteriorated considerably. There will be a need for significant works to put the building into a decent state of repair and additional conditions will be required in due course to control the detail of the works proposed.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

In this case there is evidence to support the recreation of lost elements of the building and provided that the scheme is of high quality in terms of its design and materiality the proposals have potential to enhance the setting of the host and neighbouring buildings. Unfortunately, at present the submitted information suggests that the quality of the scheme is insufficient to achieve this aspiration and, instead, the proposals risk harming the setting of the heritage assets via a poor-quality design which fails to take the opportunities

offered. We would therefore suggest that further work is required to revise the scheme to a standard appropriate to this location.

In the absence of such amendments, I would regrettably be forced to object to the proposals on the basis that they fail to meet the requirements for a high standard of design and for the preservation of heritage assets as set out within the Councils Core policies 57 and 58 and in the NPPF.