Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/05095**
Proposed rural workers dwelling
Woodhouse Farm, 98 The Strand, Keevil, Trowbridge, Wilts, BA14 6LL

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

Recommendations:

X	Comment (for reasons set out below)
	Support
	Support subject to conditions (please 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. Section 66 (PP) requires 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.

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.

The Council's Core Strategy 'Core Policy 58: Ensuring the conservation of the historic environment' requires that designated heritage assets and their settings will be conserved and where possible enhanced. It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

Site: The farmhouse is a Grade II listed building dating c.1600, square panelled timber framing with brick noggin under a Bridgwater tiled roof with gable end brick stacks.

Proposal: This proposal seeks planning permission for the Erection of a Rural Workers Dwelling to meet the essential need for a worker to live at Woodhouse Farm, which comprises around 500 acres of land with a further 100 plus acres farmed under various farm licenses and farm business tenancy agreements to fulfil the business.

Relevant planning history: N/A

Issues: Impact on setting of listed building; impact on significance of listed building.

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, whilst the applications are accompanied by a "Planning, Design & Access Statement" the document provides limited information about the listed building and fails to provide any objective assessment of the condition of the building, range of curtilage listed buildings, their date or significance or of the contribution that the proposal site makes to the significance of the listed building and, as a result, it fails to meet the requirements of the NPPF.

However, paragraph 195 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Woodhouse Farm comprises the main dairy yard and associated agricultural landholding, which surrounds the farm to all sides south of the A361. The farmhouse is a Grade II listed building and to the front of the property is a cluster of single storey curtilage listed buildings. Near to the historic farmstead are several modern purpose-built livestock barns. The farmhouse has not been occupied for decades following the construction of a new house in the 1970's; it is considered a 'building at risk'. The range of traditional outbuildings to the front of the farmstead are also is a deteriorated condition but are not considered 'at risk'.

Currently there is no accommodation at Woodhouse Farm for the applicant who farms the land or the one full time employee, who lives off site. The only property on site is occupied by the applicant's mother.

This application proposes the erection of a rural workers dwelling at Woodhouse Farm, in order to provide permanent residential accommodation at the site for a new herdsman, in connection with the care of the livestock at the farm. For these reasons it is proposed to site the dwelling to the east of the farmhouse within sight and sound of the livestock buildings.

The proposed dwelling takes the form of a simple wooden cabin, it is single storey in height and would occupy a broadly rectangular plan form, with a raised decked veranda to the north and east elevation. The floorplan allows for a 2-bedroom dwelling, with a small hall, an open plan kitchen, living, dining area and two bathrooms.

The issue is twofold – i) the principle of allowing a separate dwelling given the deteriorate condition of the listed farmhouse; and ii) the impact on the setting of the listed farmhouse.

The farmhouse has not been occupied for over 30 years. The roof of the building is failing and there is evidence of water ingress due to missing tiles and decaying roof members. Glazing is also missing in a number of the windows and plant growth and vegetation is penetrating the fabric of the building.

In principle the new workers dwelling is therefore not supported since the conservation need is the repair of the listed building and putting this designated heritage asset into a habitable use.

Whilst the siting of the proposed workers accommodation would not affect the fabric and significance of the listed building itself (which is primarily recognised due to the age, vernacular construction and use of materials and, with the farmstead, the evidence that it provides for agricultural layouts and the development of farming) the proposal would affect the setting of the designated heritage asset. Historically this part of the farmstead was open orchard which created a rural setting to the listed building and formed part of its agricultural holding. Whilst it has more recently been the location of a relatively modern building which has somewhat blurred the ability to understand the historic layout, there never appears to have been any domestic building in this area and the presence of a second, new, dwelling will mark a significant departure from the historic situation and challenge the significance of the farmhouse as the historic heart of the farmstead.

As such the location of the workers accommodation is considered to cause a level of harm in heritage terms by virtue of development within its setting since this would further challenge the perception of the farmhouse as the principal domestic hub of the farmyard and blur the ability to understand the history and development of the farmstead and its relationship with its surrounding agricultural holding. It also fails to take the opportunity to preserve or enhance the designated farmhouse and its setting as required by CP58.

In heritage terms, the business need for the workers accommodation is however recognised, although this needs to be balanced in favour of supporting the repair and putting the heritage assets into a long term viable use as required by para 197 a) of the NPPF. Paragraph 202 of the NPPF requires that harm to designated assets be offset by public benefits at an appropriate level and we consider that this could be achieved by a temporary permission for the workers accommodation for a 5 year period on the proposed site, which we would suggest should be subject to:

i) An agreed programme of Urgent Works to be carried out to secure the condition of the listed building and curtilage listed outbuildings in a wind and weathertight state. The programme to be agreed with the LPA and these are to be completed before the end of December 2023.

ii) A programme of full repairs for the listed building to be agreed with the LPA within 12 months of the grant of planning permission for the workers accommodation (the programme should include details of the works required to bring the building back into good condition and use and a timescale for achieving this)

iii) That the proposed workers accommodation be re-sited to a location to be agreed with the LPA within the 5 year period of the grant of planning permission for the workers accommodation

We suggest that this would need to be set out in a legal agreement in order to protect the significance of the heritage assets and their setting.

As discussed on site, the Conservation Team at the LPA are willing to support any agreed application for farm diversification, where this would assist with the repair and reuse of the heritage

assets. The Conservation Team are also willing to offer any letter(s) of support to potential grant funding bodies for the repair and re-use of the heritage assets.

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.

At the current time the proposal would result in harm to the listed building through development within the setting of this designated heritage asset. Whilst paragraph 202 allows that a level of harm may be offset by public benefits, which could include conservation benefits, at the current time no conservation benefits have been agreed with the LPA.

The above conservation measures are therefore set out by the Conservation Team of the LPA as a means of securing conservation benefits from the necessary repairs of the heritage assets and, in the long term, mitigation of the impact of the proposed dwelling by its resiting to a less harmful location. On this basis we would consider that the requirements of para 202 were met and we would have no objection to approval of the proposed workers accommodation.