Wiltshire Council Planning Consultation Response

5th September 2023

Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Ruaridh O'Donoghue
Officer's Title: Senior Planning Officer

Application No: **PL/2023/06037 (LBC) & PL/2023/06280 (FUL)**

External works comprising replacement and installation of addition of fenestration and doors; repairs to roof and stonework; new hard landscaping; erection of bin store and enclosure; and internal works comprising internal partial removal and replacement and new staircases - to enable conversion to 2 No. flats and 2 No. studios with ancillary communal facilities at ground floor level.
Innox Place, Stallard Street, Trowbridge

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

Recommendations:

	No Comment
	Support
X	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. 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.

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."

Site: Innox Place comprises a former short terrace of three houses constructed in ashlar and listed at grade II by virtue of their attachment to the Grade II listed former methodist church (now demolished). The building occupies a roadside position towards the centre of the town and not far from the town bridge. It is typical of development in the town at this time. It was for many years used as offices in connection with the industrial site to the rear but has been disused since the closure of the factory and its condition has deteriorated significantly as a result of lack of use and maintenance and from vandalism.

Proposal: repairs to the building and internal changes to return it to residential use as 2 flats and 2 studios plus some communal areas.

Issues: impact on the listed building, impact on the settings of neighbouring buildings, 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 and Access Statement, Heritage Statement and a condition and photographic survey. Overall, sufficient information is provided understand the impact of the proposals. 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 materials which have aesthetic and architectural interest and which contribute to the character of the conservation area.

The proposed works comprise essential repairs to the main external envelope of the building which are required as a result of the current condition following a period of neglect. Internally, the building has been significantly altered and is in very poor condition and relatively few historic features survive. The proposed uses require some alteration to the layout to facilitate the proposed uses, which will include the loss of a historic staircase – although this was a relatively plain structure and is largely obscured by later finishes, barring the handrail, and its significance is therefore limited. Whilst this will result some limited harm, the repair and reuse of the building in a viable new use will be positive overall and will also enhance the setting of neighbouring buildings and the conservation area.

As some areas of the building currently have limited or no access further defects may become obvious once the surroundings have been cleared and access is possible. Conditions are therefore required in order both to secure the final details of the proposed works and to allow flexibility for any further works which may be found to be required.

Summary & conclusion: Paragraph 202 of the NPPF allows that a level of harm may be offset by public benefits, which may include conservation benefits and in this case the proposals will also result in considerable heritage benefits by virtue of the proposed investment in repair and upgrading/repair which will help to secure the future/stability of the building via facilitating the optimum viable use. Any minor harm resulting from changes in the interior is considered to be offset by these benefits such that the impact of the proposals will be positive overall and, on this basis, the requirements of current conservation legislation,

policy or guidance (set out within Section 66 and 72 of the Act, Section 16 of the NPPF and CP58) are considered to be met and there is no objection to the approval of the applications.

Conditions are, however, required in order to secure final details of repairs and to allow for any additional works found to be required once full access is possible. I would suggest that these include:

- Following initial opening up and investigative works and prior to the implementation of any structural repairs or the replacement of any key structural element (eg floor, ceiling or roof structure), final details of the scope and nature of these repairs should be submitted to and approved by the local planning authority (the submission could take the form of a written schedule and/or annotated drawings). The works shall thereafter be carried out in accordance with the approved details.

- Prior to the installation of any new or replacement windows or external doors found to be required, details shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include elevations at a scale of not less than 1:10 and horizontal/vertical frame sections (including sections through glazing bars) at not less than 1:2. The works shall thereafter be carried out in accordance with the approved details.