Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/07765 & PL/2023/07298**
Installation of air source heat pump to heat Toad Cottage and alterations to existing oak framed building to provide living accommodation for elderly relative, with works to include erection of sunroom/ conservatory and 1. no existing car parking spaces within oak framed building to be converted to provide a kitchenette and shower/ toilet.
Toad Cottage, 10 Marlborough Road, Stibb Green, Burbage, Marlborough, Wilts, SN8 3AU

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. 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.

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.

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:

i. 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…
ii. the retention and enhancement of existing important landscaping and natural features…
iii. 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.

Site: Toad Cottage is a grade II listed building located within the Burbage Conservation Area.

Proposal: This proposal seeks to install an air source heat pump to heat Toad Cottage and also carryout alterations to the existing oak framed building to provide living accommodation for an elderly relative, with works to include the erection of a sunroom/ conservatory and 1. no existing car parking spaces within an oak framed building to be converted to provide a kitchenette and shower/ toilet.

Relevant planning history: 17/00290/FUL – Removal of existing timber garage and shed and erection of new oak framed double garage with office/sunroom (approved); ENQ/2023/00828 – Alteration to outbuilding to provide living accomodation

Issues: Impact on significance of listed building, impact on setting of listed building, impact on character and appearance of 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, whilst the applications are accompanied by a "Design & Access Statement" the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals on the setting 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.

Toad Cottage is a grade II listed building located within the Burbage Conservation Area. The building subject to this application is a modern garage building, which replaced a timber

outbuilding/garage, having been approved in 2017 based on revised plans after initial concerns were raised over the size and potential impact of the original proposals on the listed building's setting.

This application is almost identical to the pre-application enquiry carried out earlier this year, with a slightly smaller conservatory and a wider yet shallower porch. As such the preapplication guidance has largely been ignored.

Whilst there are no objections to the principle of converting part of this building to provide a form of ancillary accommodation, conservation concerns lie in the increase in size, which formed the main concern over the original 2017 proposals. In order to achieve the proposed extension, further excavation of the land would be required to lower the existing lawn area.

This would further impact on the listed building's setting, by encroachment of the outbuilding by extensions. The applicant was clearly advised that this would be unacceptable and that any accommodation should be contained within the footprint of the existing outbuilding.

In addition the applicant was also advised that there are conservation concerns that the building is also becoming too domestic in its external character and appearance (with the porch and conservatory addition). Instead it should retain is ancillary character as a subordinate building and not become overtly residential in character: this is to preserve the setting of the listed building and the relationship of the outbuilding with the main cottage.

As such at the current time the proposed ancillary accommodation is not supported in heritage terms.

Regarding the proposed air source heat pumps the proposed location is relatively discreet. However, no details have been provided to confirm what, if any, internal changes to the building are required in order to install the system i.e. new pipework, ventilation/condenser units, upgrading of existing radiators and/or insulation. As such details are requested.

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.

As such further amendments and details are requested before this application can be fully assessed.