Wiltshire Council

Wiltshire Council Planning Consultation Response

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Wiltshire Council Conservation (Central)

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Officer's Title: Planning Officer

Application No: **PL/2023/7578 (LBC) and PL/2023/07397 (PP)**
Internal alterations and the introduction of ground floor glazing to the rear
7 WOOLLEY STREET, BRADFORD ON AVON

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

Recommendations:

	No comment
X	Support in principle subject to amendments to the scheme (as set out below)
	Support subject to conditions (as 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."

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 and assets considered: Nos 7 and 9 appear to have been constructed as a pair of late Georgian town houses with a mid to late 19 century ashlar stone facade added to the street elevation. At some point in the mid/late C20 the two buildings were joined as one and both staircases were removed, a lateral division imposed and an awkward arrangement of new staircases introduced.

The property is close to the centre of Bradford-on-Avon at the beginning of Woolley Street. It is part of an important range of buildings dating from the early 17th to late 19th century and also lies within the designated conservation area.

Proposal: the applications seek changes to the internal circulation to further integrate the two former dwellings and to remove some areas of modern partitioning. There are also proposals relating to two rear extensions, which seek to improve on their thermal efficiency and design.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area – in respect of the latter, the works will have no impact on areas of the building which can be appreciated publicly and the impact on the wider conservation area will be neutral. This issue is therefore not considered further.

Information considered/provided: 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 Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

Paragraph 195 also provides for the local planning authority to make its own assessment of impact and a site visit was made on 3rd October for this purpose. The following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting (as appropriate): 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 including the remaining evidence of its historic form and layout and the changes which have occurred to this over time. Also, the architectural expression/detailing and use of high-quality design materials (demonstrated particularly in the later front elevation) have significant aesthetic and architectural interest and contribute to the character of the conservation area.

The interior of the building has, however, been compromised by significant alteration to its layout and by the loss of the majority of the historic joinery etc. during the modern period and is of lesser interest although where evidence does remain of the former layout as two dwellings, this has significance and should not be further obscured.

Assessment: the proposed works largely relate to areas of previously altered layout and fabric and will have only a limited impact on the special interests of the building.

I note that Historic England have raised concerns regarding the level of justification for the removal of the staircase. Having inspected this, I am confident that neither the layout or structure of the current stair is historic or of significance but relate to the use of the building as a shop during the C20. Whilst the historic layout relating to the use as two dwellings is not completely clear, the evidence that is available (in terms largely of areas of obviously infilled openings and modern partitions as there is no historic joinery to provide evidence) suggests that these comprised straight single flights running back from each front door, within a narrow passageway which ran the length of the building from front to rear doors.

The proposals require the loss of a modest area of flooring to accommodate the new ground to first floor stair and some small areas of historic masonry to facilitate the new layout. I would suggest a couple of small amendments to limit this so that there is a minimum removal of historic masonry and the historic layout and the character of the spaces (which comprised a series of separate rooms rather than open plan areas) remains at the forefront. These include:

a) reducing the ground floor opening from the front room of No.9 to the rear to a single door opening, avoiding the uncharacteristic opening out of the space into the stair hall and
b) reducing the new central opening on the first floor between the remodelled kitchen and dining room to a hatch 'window' style opening rather than a full opening to floor level to avoid the visual coalescence of the spaces.

The inserted shower rooms will not impact on the character of historic spaces with formal proportions and the introduction of plumbing can be achieved without harm.

The scheme includes alterations to the rear extensions. These are historic in their layout and possibly ground floor structure but later altered to incorporate salvaged architectural fabric from outside the building during the C20, presumably during the period when the building was in use as an antiques shop. The proposed changes will include largely cosmetic changes to upgrade insulation and to relocate some of the imported fittings and to embellish the external appearance. The changes are in harmony with the existing playful appearance of these structures and they will remain easily read as much altered and incorporating imported architectural salvage.

The proposed changes to windows in the modern third floor room will enhance the character of the space.

The proposed removal of paint from the ground floor rear areas will be beneficial to the historic fabric and improve the appearance of this area.

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.

The proposals will result in some minor harm to the building via the loss of fabric (which can be reduced by the changes noted above) but the majority of the works will have no greater impact over and above that of previous changes carried out in the C20. Offsetting this, the works will bring benefits in terms of a more usable ground floor layout in particular, which will allow better use of the building as single dwelling and assist in maintaining the viability of the building for the future.

Overall, the impact of the proposals on heritage assets will be largely neutral and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.

Conditions are required:

a) to control the detail of new external windows and doors and
b) to ensure that the removal of paint from the stonework does not cause unacceptable harm. I would suggest wording along the lines "at the commencement of works for the removal of paint across the

lower rear ground floor, a sample area shall first be completed to allow inspection of the impact on the underlying stonework. Following inspection (which shall be carried out in person or via photographic record as required) and approval in writing by the Local Planning Authority the works may continue in accordance with the details of the sample approved."