DESIGN & ACCESS STATEMENT



September 2023

Church Cottage, Market Place, Castle Combe, SN14 7HT

Provision of air source heat pump within the garden of Church Cottage

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APPENDIX 1 – PHOTOS

1. INTRODUCTION

1.1. Context Planning Ltd have been instructed to prepare this householder planning application for installation of an air source heat pump (ASHP) within the side courtyard of a Grade II listed building known as Church Cottage located in the centre of the village of Castle Combe (Fig.1).

1.2. The application site is located within the Castle Combe Conservation Area. It forms part of a wider group of designated heritage assets in the heart of the village including Grade I listed St Andrews Church to the west and a scheduled monument (medieval market cross) immediately to the east. The entire village is also washed over by Cotswolds AONB designation.



Fig.1 – Location of the application (indicated in blue)

1.3. The proposed ASHP would be located immediately to the side of the rear exit from the property, placed against the western boundary fence. Existing gas pipe runs will be reused to connect the apparatus to the property.

1.4. The proposed installation of the ASHP is carried out in association with the wider renovation works to the property, which are fully described in the accompanying listed building application supported by a detailed Heritage Statement and other technical documents. The listed building works predominantly relate to internal alterations and also include re-roofing and replacement of existing rooflights, which will require listed building consent but are considered permitted development under Class C of Part 1, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended). Replacement of front dormer windows are development and are discussed and considered acceptable and an enhancement as explained within the supporting Heritage Statement.

2. PLANNING HISTORY

2.1. 17/01119/LBC – Extension of internal stud wall, and installation of fan. Approved 27/04/2017

2.2. PL/2021/09304 – Refurbishment works and internal alterations. Approved 05/05/2022

3. RELEVANT POLICY AND LEGISLATION

3.1. Section 70(2) of the Town and Country Planning Act 1990 provides that, in dealing with proposals for planning permission, regard must be had to the

provisions of the development plan, so far as material to the application, and to any other material considerations. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that, if regard is to be had to the development plan for any determination, then that determination must be made in accordance with the plan unless material considerations indicate otherwise.

Wiltshire Development Plan

3.2. The Statutory Development Plan is comprised primarily of the Wiltshire Core Strategy (adopted in January 2015) and Saved Policies of West Wiltshire Local Plan 2011 (adopted in June 2006).

3.3. Core Strategy Core Policy 41 (Sustainable construction and low carbon energy) sets the framework for meeting a number of national and local that seek to achieve sustainable development and conserve natural resources. This policy seeks to reduce Wiltshire's contribution to climate change through improved design and construction methods. It states that retrofitting measures to improve the energy performance of existing buildings will be encouraged.

3.4. Core Policy 51 (Landscape) seeks to protect, conserve and enhance Wiltshire's distinctive landscape character. It states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.

3.5. Core Policy CP57 (Ensuring high quality design and place shaping)) relates to design and advises that new development should be sympathetic to the historic and natural environment. It should enhance local distinctiveness and relate positively to its setting and ensure that appropriate levels of visual and

residential amenity are achievable within a development.

3.6. Core Policy CP58 (Ensuring the Conservation of the Historic Environment) advises that development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their setting will be conserved, conserved, and where appropriate enhanced in a manner appropriate to their significance.

National Planning Policy Framework (NPPF)

3.7. Paragraph 10 advises 'so that sustainable development is pursued in a positive way, at *the heart of the Framework is a presumption in favour of sustainable development*'. Paragraph 11 outlines how the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking is to be implemented. For decision taking this means '*approving development proposals which accord with an up-to-date Development plan without delay*'.

3.8. Paragraph 38 of the NPPF advises that '*Local Planning Authorities (LPA) should approach decision-making on proposed development in a positive and creative way…and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision makers at every level should seek to approve applications for sustainable development where possible*'.

3.9. Paragraph 197 advises Local Planning Authorities (LPAs) that they '*should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation*'. Paragraph 199 advises 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'.

3.10. Enhancing or better revealing the significance of a heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 190 and 206. In determining an application, any level of harm to a heritage asset should be weighed against the public benefits of the proposals, as per paragraph 202 of the NPPF.

Supplementary Documents

3.11. The Government's Planning Practice Guidance (PPG), gives further guidance to the NPPF on how national policy is to be interpreted and applied locally.

3.12. Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

3.13. Historic England Good Practice Advice on Planning Note 3 'The Setting of Heritage Assets' (published 22 December 2017) sets out guidance on managing change within the settings of heritage assets and gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

Statutory Duties

3.14. The Planning (Listed Buildings and Conservation Areas) Act 1990 at section

72(1) outlines a statutory test for Local Planning Authorities (LPAs) to observe in exercising their planning function in conservation areas. Special attention needs to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

3.15. The Council has a statutory requirement under Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant listed building consent for any works to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

3.16. Section 66 of the Act advises that '*in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority, shall have special regard to the desirability of preserving the building or its setting*'.

4. PLANNING CONSIDERATIONS

Principle of development

4.1. Core Policy 41 of the Wiltshire Core Strategy, adopted January 2015, sets out the Council's policy for sustainable construction and low-carbon energy. Retrofitting measures to improve the performance of existing buildings is to be encouraged in accordance with the following hierarchy: i. Reduce energy consumption through energy efficiency measures; ii. Use renewable or low-carbon energy from a local/district source; iii. Use building-integrated renewable or low-carbon technologies.

4.2. The proposals involve the installation of a free-standing Air Source Heat Pump

to the rear of the host dwelling for domestic use. The Development Plan is therefore generally supportive of such technologies and they are permissible even in sensitive locations subject to not creating any harm to heritage assets, landscape character or surrounding residential amenity.

Impact upon the setting of Listed Building and the Conservation Area

4.3. The NPPF defines the setting of heritage assets as the surroundings in which it is experienced. The extent is not fixed and may change as the asset and its surroundings evolve. Elements of the setting may make a positive or negative contribution to the significance of the asset; may affect the ability to appreciate that significance; or may be neutral. The NPPF makes it clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight attaches to the asset's conservation; the more important the asset, the greater weight should be. Significance can be harmed through development within an asset's setting.

4.4. Historic England guidance The Setting of Heritage Assets indicates that setting embraces all of the surroundings from which an asset can be experienced or that can be experienced from or within the asset.

4.5. From the analysis of the historic development of the building and its curtilage (please see the accompanying Heritage Statement by Then Now When Architects) it is clear that the main heritage significance of the application site is in its contribution to the setting of the Grade I Listed Church as well as the wider group composition of numerous listed buildings in the centre of Castle Combe as a quintessential English village.

4.6. The proposal would not harm any of the above and preserve the special

architectural and historic interest of the listed building and cause no harm to its significance.

4.7. The overall scheme, including associated internal and external works to listed building, seek to significantly improve the character and the setting of this heritage asset and the wider Conservation Area. Addition of the ASHP as part of the wider retrofit of this historic house to reduce heat loss (as per requirements of CP41(i)) would significantly improve energy efficiency of Church Cottage.

4.8. A review of ASHP systems in 10 historic properties published by Historic England in May 2023[1] established that ASHPs work well in a range of different historic building types and uses and that the visual and noise impacts were not an issue in any of the case studies. However, it is good practice to carefully consider the positioning of units to minimise impacts whether or not the building is historic.

4.9. The proposed location and the free-standing design of the ASHP has been carefully selected to avoid attaching the apparatus to the building and to enable reuse of the existing pipe runs. The proposal therefore avoids any damaging fixings and the drilling into the historic fabric. It will also be completely reversible.

4.10. The positioning of the unit would be in a discrete, less formal, location within the enclosed courtyard and against a modern blockwork boundary wall. The unit will be set down and grouped with the rear doorway and bin storage. The presence of the ASHP will not have an effect upon the way the building is

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[1] Historic England 2023 Heat Pumps in Historic Buildings. Air Source Heat Pump Case Studies – Small-scale Buildings. Swindon. Historic England. HistoricEngland.org.uk/installingheatpumps

presented or experienced. The modern technology low sound design will ensure that tranquillity of the nearby churchyard is not disturbed. As such there will be no harm caused to the setting of Church Cottage itself or the surrounding heritage assets.

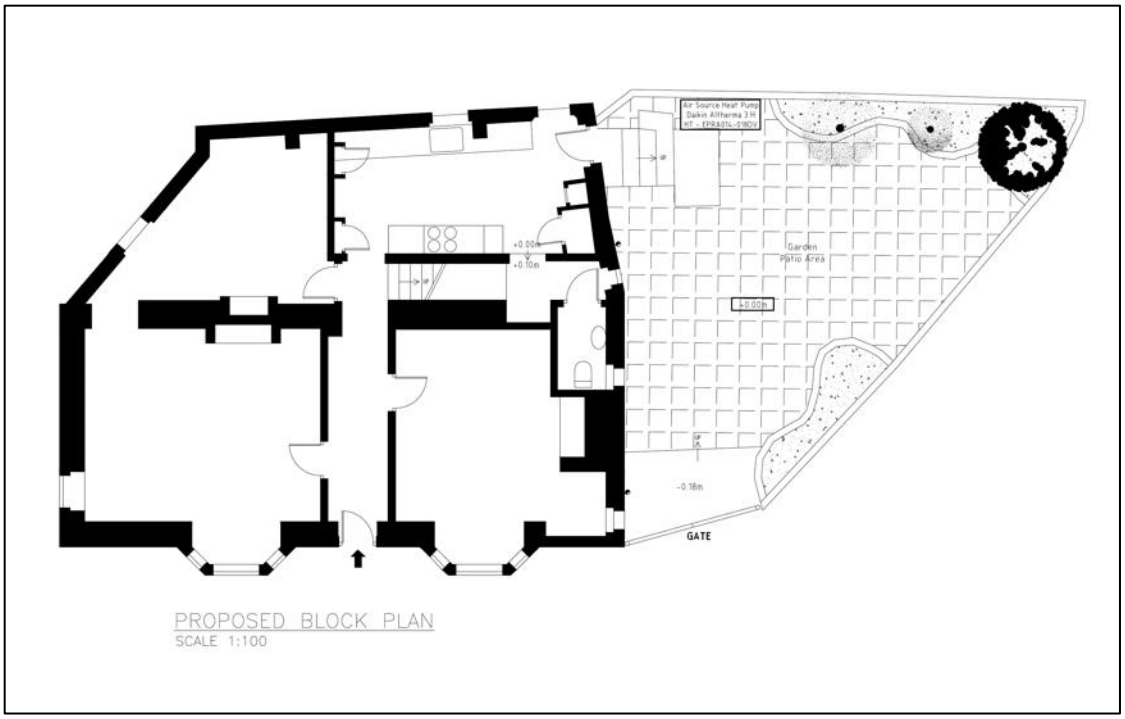


Fig.2 – Proposed block plan indicating location of the proposed unit

4.11. The design of the unit is sleep and simple. It has been designed to blend seamlessly into the built environment. The black front horizontal grill conceals the fan inside, while the matt grey casing blends discreetly with the surrounding stone and blockwork (Fig.3).

4.12. Within the wider Castle Combe Conservation Area, the proposal will be completely screened by boundary walls. It cannot be viewed from Market Place or the church yard to the rear. As such the charter and appearance of the conservation area will be preserved in line with the statutory requirement set out in Section 72 of the Act.



Fig.3 – Typical external appearance of Daikin Altherma 3 H HT Heat Pump (H990mm x W1270mm x D460mm)

Area of Outstanding Natural Beauty

4.13. The surrounding landscape setting of the development would not be harmed or in any way impacted due to the modest scale of the proposed development. Overall, there will be no change in terms of the visual appearance of the site within the AONB. The proposal will retain the key views and rural village character of the locality.

4.1. The proposal would therefore comply with the requirements of policies CP51 and CP57 that seek to secure development that takes account of the characteristics of the site whilst making efficient use of the land. The proposals would also be

consistent with the aims of the AONB Management Plan for the reasons outlined.

Residential Amenity

4.2. Policy CP57 requires new developments to have regard to the compatibility of adjoining buildings and uses, to ensure that appropriate levels of amenity are achievable within a development. The site is surrounded by residential properties on three sides, and the proposed residential use would be compatible with the prevailing character of the area.

4.3. The development of the site would not compromise the residential amenity currently enjoyed by any neighbouring occupiers and is designed to ensure that future occupiers of the development have satisfactory living conditions.

4.4. The ASHP is set som 18m and on the opposite side of the cottage in relation to the nearest neighbour at The Gates, and over 30m away from 1 West Street to the north-west. Immediately to the west of the site lies church cemetery and the Church.

4.5. The Daikin Altherma 3 H HT has been designed for lower acoustic levels to meet the needs of urban areas and homeowner expectations. It is Quiet Mark certified and operates at whisper-quiet levels for maximum acoustic comfort. The system offers enhanced flexibility by providing a low sound mode. In standard sound mode, the unit produces a sound pressure of 38 dBA at 3 metres. The low sound mode reduces the pressure even further by 3 dB(A) at 3 metres to reach 35 dB(A), representing a real reduction of half the sound level.

4.6. Compressor sound power has been reduced by improving absorption and insulation. The compressor has been designed with three-layer insulation of air, insulation material and a metal box. The unit also benefits from double sound

reduction by using rubber pads between the bottom plate and the vibration plate under the compressor, thereby maximising absorption.

4.7. Overall, the proposed development would safeguard neighbouring amenity whilst providing for a satisfactory level of amenity for the future occupiers. The terms of CP57 and the requirements of the NPPF.

5. CONCLUSION

5.1. In line with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, planning applications should be determined in accordance with development plan, unless material considerations indicate otherwise.

5.2. In February 2019, Wiltshire Council resolved to acknowledge a climate emergency, seeking to make the county of Wiltshire carbon neutral by 2030. Carbon reduction in the county is also a key theme of the Council in its recovery from the impacts of the COVID-19 pandemic.

5.3. The proposal will make a small but an important contribution towards this objective without causing harm to the heritage asset or the surrounding environment. On the contrary, when viewed as a whole, the proposed works will be highly beneficial for the long-term conservation and optimum viable use of this important listed building, which has been deteriorating for some time now.

5.4. The new owner is looking to make a significant investment to address a number of serious issues affecting this heritage asset. One of the key objectives is to ensure that the building is future-proof and energy-efficient whilst employing traditional construction methods and improving the building's breathability,

structural integrity and thermal performance.

5.5. All these are significant public befits weighing in favour of the proposal in line with the statutory duty in sections 16 and 66 of the Listed Buildings Act 1990 and the NPPF (paragraph 199).

5.6. As identified above, the proposal will fully accord with relevant policies in the Development Plan, the NPPF as well as statutory duties set out in the Act and the Council are therefore respectfully urged to approve the application without delay.

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APPENDIX 1 – Photos



Front (East) and side (South) elevations



Rear (West) Elevation



Side (North) elevation



Proposed location for the ASHP



View of the side courtyards from Market Place



View of the side courtyard from the St Andrews churchyard