Wiltshire Council Planning Consultation Response

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Officer's Title: Planning Officer

Application No: **PL/2023/09120**
Two new flats
Land Adjacent 65, Drynham Road, Trowbridge, BA14 0PF

Please find following comments in respect of the above application.

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 or enhancing 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.

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: The site is garden area associated with 65, Drynham Road and has a mature hedgerow the full width of the plot.

Proposal: The proposal seeks two new flats and parking to the frontage

Relevant planning history: 20/03697/PREAPP – Proposed new No.2 dwellings; PL/2023/01428 - Two new flats (refused)

Issues: Impact on the setting of listed building and curtilage listed outbuildings. The heritage assets are directly opposite the site.

Assessment: Paragraph 194 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. The current application whilst supported by a Design, Access and Heritage Statement, fails the requirements of paragraph 194 of the NPPF and has not been assessed using appropriate expertise.

There is no heritage objection in principle to two flats subject to a high quality design that is sympathetic to the setting of the heritage assets.

The pre-application scheme did not include any elevations or streetscene, hence these aspects of the proposal were not commented upon previously.

The amended proposal seeks in effect a 2½ storey building. The heritage assets historically formed Drynham Farm and the farmhouse and a range of single storey outbuildings are located opposite the site.

The scale/height of the proposal could be reduced further since a third storey is proposed solely for storage. Reducing the height of the building would reduce its impact and make it less dominant in the setting of the listed and curtilage listed buildings. This would also help the street scene since by reducing the building in height would create a better relationship both to the heritage assets and the neighbouring single storey properties. In addition, by removing the storage would remove the need for roof lights which would add clutter to the front elevation facing the heritage assets.

The existing and proposed streetscene are inaccurate since the previously proposed building is shown in the drawing and not the current proposed scheme.

Para 199 of the NPPF confirms that great weight should be given to the asset's conservation and Para 200 requires that any harm to the significance of a designated heritage asset (from its alteration .... or development within its setting) should require clear and convincing justification.

I also point out to the applicant that following the recent introduction of the Levelling Up and Regeneration Act 2023 that there is a requirement for development proposals to preserve or enhance listed buildings and their settings (not just preserve).

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 design amendments and further information are requested.