Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/06112 & PL/2023/04019**
Proposed alterations to enable conversion of detached barn/store into a 1 bedroom annexe accommodation.
Glebe Farmhouse, Westbury Road, Little Cheverell, Devizes, SN10 4JP

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

Recommendations:

	Comment (for reasons set out below)
	Support
	Support subject to conditions (please set out below)
X	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.

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: The site is a Grade II listed building located within Little Cheverell Conservation Area.

Proposal: The proposal seeks the alterations and conversion of a detached barn/store into a 1 bedroom annexe accommodation.

Relevant planning history: N/A

Issues: Impact of setting of listed buildings, impact on character and appearance of conservation area.

Assessment: This is my second consultation response and follows on from the submission of a revised Heritage Planning Statement. As stated previously, 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 "Heritage Planning 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. I would also add from reading this statement that the heritage assets do not appear to have been assessed using appropriate expertise. 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.

Glebe Farmhouse is a Grade II listed building. The dwellinghouse sits in a large plot in the rural area, opposite St Mary's Church. The immediate enclave is residential use with all other neighbouring properties constructed in the mid to late 20th Century. The main house has a detached outbuilding/garage to which this application relates.

The proposal seeks to convert the existing detached garage into an annex for use by the occupants. The existing roof would remain in situ with only the installation of two small skylight windows. The existing brick walls would remain and new timber fenestration and doors would be

installed to the existing openings, matching the main dwellinghouse. Internal works would include thermal upgrade to the interior leaves of the exterior walls, and a small bathroom and kitchen would be fitted, connecting to the existing foul drainage.

The outbuilding is a curtilage listed building of traditional brickbond and lime mortar. The building makes a contribution to the setting of the host building and forms part of this grouping. It also makes a positive contribution to the conservation area. The significance of the outbuilding lies largely with its historic fabric, its form, simple architectural expression which contribute to the setting of the main listed building and the character of the conservation area.

The proposed works would involve significant structural upgrading of the outbuilding to create habitable accommodation, including a first floor. This would involve providing foundations to the existing building which has the potential to destabilise the curtilage listed building; new internal walls would also most likely be required. The outbuilding would have a domestic appearance with infilling of the open frontage with fussy window openings, roof lights and a new window. The interior would be entirely modern and subdivided and would no longer read as an open simple space. This would detract from the simplicity and significance of the outbuilding and would detract from the grouping with the farmhouse.

I am also concerned that cars and storage would be permanently displaced into the curtilage of the listed building and this would provide pressure for additional garaging/structures on the plot.

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 harm to the building via the loss of historic fabric and character and via change to its layout and original external form. The proposals would involve only change to part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve significant change and alteration to the structure and historic fabric and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 202 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and the proposals are articulated as being primarily for the convenience of the occupants i.e. a private benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.