Wiltshire Council

Wiltshire Council Planning Consultation Response

30/12/ 2023

Guy Bentham-Hill
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name:Selina Parker-Miles
Officer's Title: Senior Planning Officer

Application No: **PL/2023/08819 and PL/2023/09072**
Manor Farm House, Winsley BA15 2LN

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

Recommendations:

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

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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." 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 (amongst other things) "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" and "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."

Paragraph 194 of the NPPF 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 and Heritage 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 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.

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 - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

Whilst the application refers to the works as being untaken to the rear of the building this does not accord with either my inspection of the site or the analysis of the historic maps which show the elevation in question fronting Bradford Road to have historically served as the main access to the building.

To be clear the proposals do not cause loss of historic fabric – the objection in this case is on the basis that the proposal would disrupt the existing façade of the building visually and read as discordant element as one views the Listed Building from the street.

The proposal is for a modern flat roofed structure with a glass lantern this is an odds with the steeply pitched roofs of the original building.

In addition the extension would break the linear form of the existing elevation. The existing building is an amalgam of different phases of construction including a three storey element to the right hand and a two storey building to the centre and modern bay to the left hand. All three elements follow a uniform building line which contributes to the significance of the listed building and its historic legibility.

It should be noted that this a principle objection was raised as part of the consideration of ENQ/2021/03215 to any porch on this elevation of the building. Whilst the design has been amended since the pre-app the principle of development remain unacceptable in this case.

The degree of harm in the case is considered to be less than substantial as there is no loss of historic material nether the less the works would affect the appearance of the building and the manner in which it is perceived in the Conservation Area. To be clear the impact on the conservation area is minor to the lowest end of less than substantial harm. The impact on the listed building in considered to be just below the mid range of less than substantial harm as the works are modest in nature and impacts would be solely on the appearance of the building and its setting.

The submitted information fails to convince the LPA of the necessity for the proposed works, any gains appear private and there are no conservation benefits that I can discern from reviewing the proposals.

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. There is no justification for the works in this case or attempt to explain the necessity for the proposed intervention.

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.