Wiltshire Council Planning Consultation Response

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Application No: **PL/2023/07274 (LBC) and PL/2023/7244 (PA)**
Internal alterations to create two flats

16 High Street, Warminster, BA12 9AE

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

Recommendations:

x	Comment
	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." 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.

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

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."

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:

16 High Street, Warminster is a grade II listed building. The list description (which lists 14-18 even) is as follows:

'Early C19 front of painted brick with stone coping in 2 builds; ***Nos 14 and 16 2 storeys****, No 18 3 storeys, over basements, but cope and ridge height continuous. Tiled roof hipped to right, one brick ridge chimney. Nos 14 and 16 2 first floor windows (with stone lintels and keys). Early C20 shop front altered to allow entrance from right and entrance to house left, framed by 3 panelled pilaster strips. No 18: One range of windows, late glazed sashes on 1st and 2nd floors, and in casement on the ground floor. Round headed doorway to left.'*

However, what we do know is that buildings in this area have fabric dating from the medieval period (indeed the form of the burgage plots is still legible in areas) as this part of Warminster was the early market place. As such, the list description, which focuses only on the external appearance (as do most list descriptions) will not necessarily reflect what is of interest and significance about this particular building – perhaps as yet undiscovered or unarticulated.

The building is also within the Warminster Conservation Area.

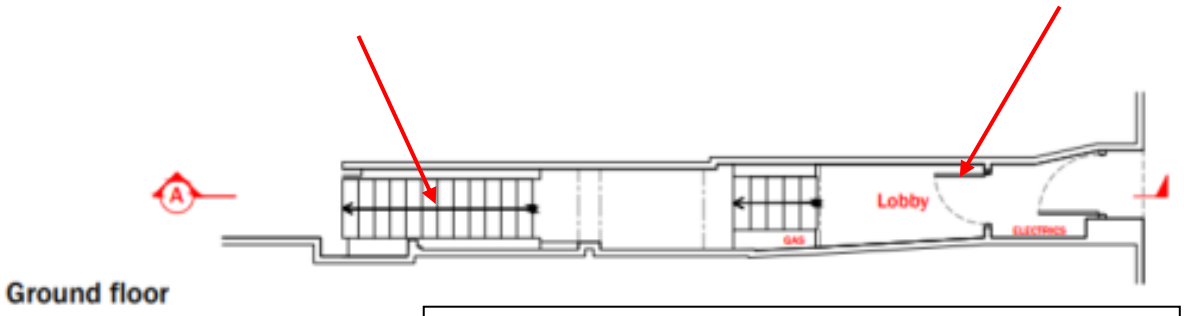
Proposal:

The existing building is a mix of commercial (ground floor) and one flat at first floor (accessed via a separate side access). There is no formal use for the attic space. The proposal is to add a further two additional flats – one at ground (to the rear and accessed via an existing rear door) and one at first and second.

The existing ground floor is a combination of commercial public space at the front, and storage/ancillary spaces at the rear in what appears to be (judging from the footprint) a later extension (date unknown?). The floorplan for the existing ground floor is curiously not shown in full on the ground floor plan.

The proposal at ground floor involves: creating a WC/storage area in the front part of the rear space and then inserting a party wall. Partitions are then removed and reconfigured to form a kitchen, lounge, shower and bedroom (which doesn't have any windows). Access is via the existing rear entrance..

In addition, a new staircase (to the first floor) is installed.



Ground floor

A new staircase replaces this one and the walls are lined out, as well as a fire door installed within the lobby

FIRST FLOOR



First floor

First floor – divided into two flats, one at the front and one at the rear.

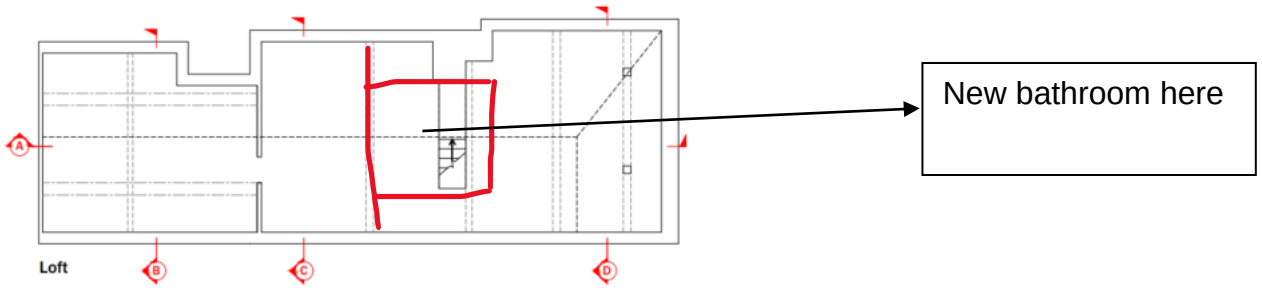
This is accessed via the ground floor lobby and proposed replacement staircase. It leads into a hall which is lined out to form a shared space. Two new fire doors lead into the flat at the front, and one into the flat at the rear.

<u>Flat at the front</u>

Lots of partition are removed/re-configured and new partitions inserted. Also, lots of existing doors are impacted/moved (one assumes including architraves etc).

The principal front room (piano nobile) is subdivided to form a living/dining and bedroom. The division is between the two windows and the corner fireplace within the living room.

A kitchen is formed out of the subdivision of an existing kitchen. Flat 1 also has the existing staircase to the attic floor.



At attic level,a small bathroom is formed – served by two new rooflights.

Flat at the rear

A party wall is installed within the rear extension to subdivide it. The living room wall is modified around the staircase, the existing bathroom reduced in size. A fire resistant hall created. A new window is installed within the dining room (no elevation details). A new staircase leads up to the second floor.

At attic level: a bedroom and bathroom are formed, served by new rooflights (plans say conservation style but don't show the traditional vertical mullion).

A party wall is installed and a store room formed in part of the roof.

No mention is made of any necessary works to the front windows (unfortunately).

Issues: impact on the significance (interest) of a statutorily listed building (ie national interest) and impact on the Warminster conservation area.

Information considered/provided:

Paragraph 194 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting.

The assessment provided does not assess the significance of the heritage asset and makes no mention of the conservation area. It cites the list description but this is merely a means to identify a building. There is no analysis of the internal features or character of the internal space.

However, notwithstanding the absence of a proper assessment, paragraph 195 makes provision for the LPA to undertake its own assessment (and I shall arrange a site visit).

Assessment:

There is very little information in this application to assess the impact of the proposals on the significance of the listed building.

Many changes are required to provide the two additional flats. Staircases are installed (impact on floorboards, historic joists), surfaces lined or replaced (loss of lathe and plaster potentially); partitions removed (they could be historic also impact on floorplan, always a significant aspect of a listed building), a new window installed (no details supplied or an elevation). Also there is much that is unsaid ie one assumes there would need to be fire/noise partitioning between the ground and firsr floor rear flat. How is this to be achieved? Also, there is no assessment of the interest of the roofdspace, usually the most 'sensitive' areas in a building (ie likely to be the least altered). The changes might be acceptable, there is just so little information provided. There is also no information about service runs, pipes and ventilation, and no mention of whether windows will be upgraded (which would be an issue).

Summary & conclusion:

The application contains inadequate information to assess the impact of the proposals on the significance of this grade II listed building. More information should be supplied, as well as photos.

The harm that I can clearly identify (removal of a staircase, an additional staircase from first to attic floor, the subdivision of the attic etc) arise from trying to shoe-horn two **additional** flats into this building. The proposals are over-ambitious. It would seem to me that the ground floor proposal could be achieved without harm to the significance of the building but the subdivision of the first floor, is problematic.

In its current form, given the lack of information and my concerns I would recommend **REFUSAL** of the application on the basis that it is contrary to section 66 of the Planning LBCA Act 1990 as well as core policy 58 and Chapter 16 of the NPPF (enhancing significance).