Wiltshire Council Planning Consultation Response

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Application No: **PL/2024/00275 (LBC) & PL/2023/11008 (PP)**

Demolition of redundant stone barns; Conversion and extension of farmhouse to form co-working hub and children's nursery at ground floor (Class E) and conversion of first floor to a single residential apartment (Class C3); and associated internal and external works.

The planning permission also includes the "Erection of convenience store (Class E); and associated access and landscaping works.

Southview Farm, Drynham Road, Trowbridge

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

Recommendations:

	No comment
X	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.

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 207-9 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 203 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 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.

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."

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: Southview Farm is a C19th farmhouse located to the south of Trowbridge. It remained at the edge of the town with open fields around, curtailed only by the railway line to the east, until the end of the C19 but speculative housing development has gradually spread outwards from the core of the town to the point where it is now largely surrounded by housing. The remaining setting of the farmhouse, which contributes to the understanding of the building as a former farmhouse, includes the range of curtilage listed former farm buildings to the north and the open land around and to the south of the building. We have previously advised that we consider that the range of outbuildings should be treated as part of the curtilage unless specific evidence is provided (for example in the form of ownership details) to suggest otherwise. So far as I am aware no evidence has been provided.

Proposal: the applications include proposals for the demolition of the single storey range of buildings to the north and their replacement with a convenience retail store and for the conversion of the farmhouse and erection of an additional building for office use as a co-working hub and children's nursery with a residential unit above.

Relevant planning history: the applications follow a pre-application enquiry made at the end of 2022. Outline consent has been granted (19/11459/OUT) for residential development on adjacent land which previously formed the agricultural holding related to the farm. Regrettably, whilst the initial indictive masterplan left a small landscaped plot immediately to the south of the farmhouse and adjacent to the access road to the development, it is understood that more recent, approved, iterations indicate that housing will extend close to the east of the building, in conflict with Conservation advice and the earlier efforts of the current Case Officer. It is therefore established that the remaining agricultural setting of the farmhouse is due to be lost to suburban development.

Issues: impact on the character, appearance and setting of the listed building and its curtilage outbuildings.

Assessment: Paragraph 200 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 Statement" which provides an overview of the site, the document provides only a cursory description of the farmhouse itself, partly in view of the poor condition of the building at the time that it was written. However, paragraph 201 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis with the assistance of previous site visits and records.

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, design and materials which comprise a good example of a typical mid-C19 farmhouse in the area and from the contribution it makes with its remaining farmstead, to the understanding and experience of the historic agricultural landscape which surrounded and served the growing town of Trowbridge in the C19.

I last viewed the building in detail some time ago (internally in 2018 from when I have some record photographs) when it was already in a poor state of repair. The photos provided indicate that this has only worsened since and it is clear that the owners have done nothing to attempt to protect the building, repair it following thefts and vandalism or to prevent further deterioration. The remaining outbuildings were also in a very poor state of repair and I am unsurprised that the conclusion have been reached that their repair and re-use is likely to effectively involve their reconstruction rather than a conservative repair. It is clear that the farmhouse urgently needs to be brought back into use to secure its repair and safeguard its remaining special interest. In considering the current proposals paragraph 202 of the NPPF should be borne in mind which advises that "Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision".

Principle of change of use: when a designated heritage asset becomes redundant it is important that a new use be found quickly to ensure that the asset continues to be maintained and secured for the future. The most recent domestic use of the site lapsed some time ago and the results of lack of routine maintenance and inspection are evident. In response, paragraph 131 of the NPPF encourages authorities to "take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation". In the majority of cases it is acknowledged that continuation in a similar use will usually offer the best chances of sustaining the asset whilst limiting any further harm which might result. The current enquiry, however, suggests that single residential use is unlikely to be viable given the condition of the building and its location on the edge of a major development site and, whilst both the condition and the form and proximity of the proposed development have been within the control of the current owners for some years and the NPPF notes in paragraph 202 that "Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision", the site has now reached a point where in purely practical terms, the force of the argument must be acknowledged.

In such cases the Planning Practice Guidance gives guidance on alternative uses, acknowledging that "putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. Whilst the current application enquiry relates to a single proposal and provides no evidence of other options considered, we have also seen a previous proposal to incorporate the farmhouse into a small housing scheme which would have resulted in a significant harm to its setting via the comprehensive development and subdivision of the land and the suburbanising impact of the proposed housing. On balance, the current proposals offer better potential to repair the building and preserve some of the essence of its setting without the need for extensive subdivision and there is therefore no objection in principle.

Demolition of the outbuildings – despite that the Heritage Statement suggests, the ultimate condition of the outbuildings is the responsibility of the owners and loss of the curtilage listed former farm buildings which (albeit now in extremely poor and largely unsalvageable condition) did contribute to the setting and understanding of the farmhouse, will cause some harm to the setting of the farmhouse.

Regrettably, taking into account the further deterioration of the buildings I agree that their demolition is inevitable. Proposals to salvage and re-use as much of the stone as possible provide some small mitigation for this and should be conditioned to ensure that they are carried through.

Conversion of the Farmhouse – we have previously advised that any conversion would need to be low-key, retaining architectural features internally and externally and minimising the impact from subdivision and the requirements for the provision of services and fire escape etc. in accordance with section 16 of the Act. The proposed layout maintains the basic layout of the building and could provide an acceptable scheme. However, very limited detail is provided in respect of the nature of the repairs that are required. Taking into account paragraph 202 of the NPPF we should be expecting the restoration to be comprehensive and carried out in traditional materials and to a high quality to restore the remaining significance of the building which has largely been lost as a result of the recent neglect. Ideally an outline repair schedule indicating a good standard of conservation repair should be submitted at this stage and followed by a more detail repair

schedule (which could be conditioned to allow for further survey) to allow us to assess and control the details.

Rear addition to create co-worker unit and nursery – the proposed ranges around a small courtyard are reasonably successful in reflecting a traditional outbuilding scale, form and materiality which maintains some level of subservience to the farmhouse and preserve its setting in compliance with CP57 and 58. Ideally those elements closest to the house and in the public view would have more of a domestic rather than an agricultural character and a brick gable or painted timber finish rather than the proposed 'weathered timber' finish in this area at least would be more appropriate but this is a relatively small point:



New retail unit – we previously advised that a bespoke recreation to serve as a convenience store could maintain the layout and essence of the group of buildings and continue to contribute to understanding of the site "provided that the form and scale of the buildings and the landscaping is as indicated in the pre-app using similar proportions, scale and materiality to the traditional outbuildings and maintaining solid gables to the road". This has largely been carried through and the double gable approach is reasonably successful in maintaining something of the proportions of such buildings. Final details of materials and architectural detailing etc. would need to be carefully controlled to avoid later erosion of the quality of the scheme.

It is regrettable that the building has been pushed back within the site, increasing the openness of the frontage and creating a prominent expanse of car-parking which fails to respond positively to the historic environment to integrate development into its setting. Ideally some at least of the parking would be moved further back in the site and the new buildings brought forward – if there are conflicting pressures in terms of meeting the operational, ecological and highway requirements which make this impossible, this should be clearly set out to provide justification for the harm that will be caused. In this case, further mitigation should be provided – possibly via the use of more appropriate surfaces or landscaping.

We previously advised that the design and siting of signage (and external lighting) for the site overall would need to be especially carefully considered as the NPPF notes that "the quality and character of places can suffer when advertisements are poorly sited and designed". No details have been provided for assessment and these are required.

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. In this case it is acknowledged that the buildings have reached a critical stage and that a new use is urgently required to secure their future. The current proposals appear to have potential to provide an appropriate use whilst limiting the adverse impact on the listed farmhouse and its setting such that, taking into account the current situation, the overall impacts could be considered as broadly neutral with any minor harm offset by the benefits of good design and the introduction of a viable use.

Provided that this were the case the requirements of current conservation legislation, policy or guidance would be considered to be met and there would be no objection to the approval of the applications. However, the final impact will be entirely dependent on the detail of the scheme and I would therefore suggest that further details noted above, with regard to the repair of the farmhouse, site layout and details

of signage and lighting are sought. The applicants would also be advised to ensure that the proposals are carefully designed out and costed. Significant changes to the design and/or materials etc. to reduce the costs of the construction which dilute the proposed traditional rural aesthetic of the scheme are unlikely to be supported as the impacts of the scheme are already finely balanced against the benefits. Final details should be clearly conditioned and carefully controlled to ensure that the advice in the NPPF para 140 is complied with i.e. that local planning authorities should “ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme” is complied with.

I will be happy to discuss the wording of conditions in due course once the additional information above is received.