Wiltshire Council Planning Consultation Response

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Wiltshire Council Conservation (Central)

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Officer's Title: Senior Planning Officer

Application No: **PL/2023/10262 (LBC) & PL/2023/09858 (PP)**
General refurbishment, loft conversion and rear extension
13 St Margarets Street, Bradford on Avon

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

Recommendations:

	No comment
X	Support in principle subject to additional details/ amendments (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.

Revision email dated 15/05/2024:

Notes 01, 02 and 09 A17 23 39 P02 Rev B Proposed Floor Plans (Ground) have not been amended as advised. However, we now have an appropriate detail on drawing A17 29 39 P11 Boundary wall Details (living Room) so, in the interests of achieving a determination, I suggest that you simply add an additional condition to the LBC noting that:

> Notes 01, 02 and 09 to drawing A17 23 39 P02 Rev B Proposed Floor Plans (Ground) are not approved. Notwithstanding the details indicated in these notes, the walls and floor in question are to be treated in accordance with the approved detail shown on drawing A17 29 39 P11 Boundary wall Details (living Room).
>
> REASON: In the interests of preserving the historic fabric and character of the listed building.

With regard to the removal of render from the front elevation – I am happy for them to continue with the removal but it seems clear to me that the repairs works will need to be more than simply repointing, with either significant stone replacement or possibly re-rendering in lime likely to be required. In order to allow flexibility I would suggest amending my previously suggested Condition1 to:

> Following the removal of cementitious render from the building and prior to the commencement of any works required to make the elevation good, final proposals for the treatment of the elevation (including the scope and details of any stone replacement or rendering) shall be submitted to and approved in

writing by the Local Planning Authority. The works shall then be carried out in accordance with the approved details.

REASON: In the interests of preserving the historic fabric and character of the listed building.

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 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.

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."

Site and assets considered: the site is located towards the centre of Bradford on Avon in a roadside location. The house is within a mixed terrace and is listed at Grade II. Properties to either side are also listed and the whole lies within the designated Bradford on Avon conservation area.

Proposal: the general refurbishment of the building, which is in a poor state of repair, including the conversion of the loft space for residential use and a modest rear extension.

Relevant planning history:

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: 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, the applications are accompanied by a "Design and Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

Significance of assets and contribution of setting (as appropriate): 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 appearance which, as part of the terrace, contribute to the character of the conservation area. The list description is as follows:

2. One building. Early C19. 2 storeys, Cement rendered, pantiled roof. 2 windows. Sashes with glazing bars in stone surrounds with plain pedimented heads. Modern central glazed door, 3 steps up. Right-hand door to No 14A in wooden moulded surround. 4 upper panels with raised fields to door. Included for group value.

The Three Horseshoes and Nos 1 to 4 (consec) Frome Road form a group with the Liberal Club, The Baptist Chapel, the Congregational Church and Hall and Nos 6 to 16 (consec), 19 to 22 (consec), 36, 42 to 49 (consec) and Westbury House, St Margaret's Street and No 1 St Margaret's Hill.

Assessment: the building is currently in a poor state of repair having been empty for a considerable period and clearly lacking investment for longer. The repair and bringing back into economic use will assist in securing the future of the building under its optimum viable use. Whilst the works required to reconfigure the spaces to provide access to the loft and to convert this area will result in a change in character to the loft and some modest loss of historic fabric, the works will generally respect the overall character of the building and are justified in the interests of driving investment in the building's fabric overall.

On site we discussed a number of minor amendment to the repair approach to ensure that the proposals are an appropriate response to the traditional construction. The majority of these have been reflected in the revised plans submitted but I consider that the following points remain to be addressed:

A17 23 39 P05 Rev B Proposed Elevation – Note 02 presumably needs to be amended to reflect the decision to replace the windows. The application should be a clear statement as to which windows are to be replaced. I'm not sure if this is also the case for Note 11 and the rear windows or whether these will still be retained and repaired.

A17 23 39 P02 Rev B Proposed Floor Plans (Ground) – no revision provided but the following amendments appear to be required:

Note 01 needs to be amended to reflect the new proposed boundary wall section detail (A17 23 39 P11).

Note 02 – we discussed on site alternative options for either replacing the suspended timber floors and improving the ventilation to these (via reorientating the sleeper walls in the 'dining room' or replacement these with a limecrete floor which would continue to allow the structure to breath. The boundary wall detail section suggests that the former option is preferred and the details should be amended to reflect this.

Note 09 – we discussed the potential issues from lining out this structure with interstitial condensation etc. and the benefits for the fabric of retaining/improving breathability and I am not sure what the conclusion has been with regard to preferred option

Note 16 - refers to the retention and repair of the windows but these are now proposed for replacement

A17 23 39 P03 Rev B Proposed Floor Plans (First) - no revision provided but the following amendments appear to be required:

Note 01 – we discussed the risks inherent in lining the walls out in a non-breathable finish and introducing a VPL and the likelihood of creating cold bridges which would lead to decay, for example at the junctions of the floor structure with the walls. I assume that an amended detail is required in response.

08 – ditto

Note 15 - refers to the retention and repair of the windows but these are now proposed for replacement

A17 23 39 P04 Rev B Proposed Floor Plans (Loft) – Note 04 we discussed the risks inherent in lining the walls out in a non-breathable finish and introducing a VPL and the likelihood of creating cold bridges which would lead to decay, for example at the junctions of the floor structure with the walls. I assume that an amended detail is required in response.

A17 29 39 P12 Typical Sash Window detail – the proposed details are acceptable

A17 29 39 P11 Boundary wall Details (living Room) - the proposed details are acceptable

In addition, conditions are required to control the following details as the works progress:

1. The removal of the cementitious render from the front wall and making good – as we discussed, there is no objection in principal to this work which could bring significant benefits in terms of improving breathability. However, how easy this will be to do ro what works will be required for making good as a result of the removal are unknown. In order to control the works and provide flexibility I would suggest a condition along the following lines:

   Prior to the commencement of any significant areas of removal of cementitious render from the building, a sample panel (c.1m square) shall be completed, the findings assessed and final proposals for the treatment of the elevation (including the final scope of the removal and proposals for making good following that removal) shall be submitted to and approved in writing by the Local Planning Authority. The works shall then be carried out in accordance with the approved details.

   REASON: In the interests of preserving the historic fabric and character of the listed building.

2. Details of the proposed new roofing material and timber cladding to the rear extension (standard condition)

3. Joinery details for the proposed front door (standard condition).
   REASON: In the interests of preserving the historic fabric and character of the listed building.

4. All proposed new internal joinery (skirting and internal doors) should match adjacent historic examples in all respects.
   REASON: In the interests of preserving the historic fabric and character of the listed building.

5. New windows to have a painted finish.
   REASON: In the interests of preserving the historic fabric and character of the listed building.

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).

The proposals will result in minor harm to the building via the loss of historic fabric during the conversion of the loft space and adding the extension. However, paragraph 208 also allows that a level of harm may be offset by public benefits, which could include conservation benefits and, in this case the proposals will also result in considerable heritage benefits by virtue of the proposed investment in repair and upgrading/structural repair which will help to secure the future/stability of the building and to facilitate its optimum viable use for residential occupancy.

The repair and use of the building will also benefit the setting of neighbouring buildings and the conservation area.

On balance, subject to the final details noted above, when the scheme overall is considered the impact of the proposals will be positive and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.