

Built Heritage Statement.

Stables at Coggsell, Tytherton Lucas, Chippenham, Wiltshire.

On behalf of Armstrong Architecture Limited.

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Contents.

1. Introduction.....	5
2. Proposed Development.....	6
3. Methodology.....	8
4. Policy Framework.....	10
5. Site Description and Planning History.....	11
6. The Historic Environment.....	18
7. Assessment of Impacts.....	41
8. Conclusions.....	45

Appendices contents.

Appendix 1: Assessment Methodology.....	46
Appendix 2: Legislative Framework.....	53
Appendix 3: National Policy Guidance.....	55
Appendix 4: Relevant Development Plan Policies.....	62
Appendix 5: Stables at Cogswell List Entry.....	63
Appendix 6: Cogswell List Entry.....	65

Plates:

Plate 1: Site Location Plan.....	5
Plate 2: The 1838 Tithe Plan, with approximate Site location (The Genealogist)	11
Plate 3: The 1886 ordnance Survey Map, showing approximate Site location (NLSM).	12
Plate 4: The 1900 Ordnance Survey Map, with approximate Site location (NLSM).....	12
Plate 5: The 1923 Ordnance Survey Map, with approximate Site location (NLSM).....	13
Plate 6: The 1960 National Grid Map, with approximate Site location (NLSM).	13
Plate 7: Satellite imagery from 1999, with approximate Site location (Google Earth).....	14
Plate 8: Satellite imagery from 2006, with approximate Site location (Google Earth).	14
Plate 9: Photograph of the Grade II Listed Stables at Coggsell, 2006 (Historic England).....	15
Plate 10: The existing and proposed plans for the double garage extension (Application Ref. No. N/O4/OO680/LBC).....	16
Plate 11: The Grade II Listed Stables at Coggsell.....	20
Plate 12: The Grade II Listed Stables at Coggsell.	21
Plate 13: The principal north-western elevation of the Grade II Listed Stables at Coggsell.....	23
Plate 14: The north-eastern elevation of the Stables at Coggsell.	24
Plate 15: The south-western elevation of the Stables at Coggsell.....	24
Plate 16: The south-eastern elevation of the Stables at Coggsell.....	25
Plate 17: The walkway within the north-western extent of the south-western compartment, facing north-eastwards.	27
Plate 18: The inserted window with timber pegs above, and concrete block wall below, within the south-western compartment.....	27
Plate 19: The modern partition wall and modern machine cut timber ceiling structure of the south-western compartment.....	28
Plate 20: The south-western stall of the south-western compartment.	28

Plate 21: View south-eastwards within the central compartment, showing the flagstone floor, section of cobbled stones, and exposed timber beam.....	29
Plate 22: View north-westwards within the central compartment.....	29
Plate 23: View north-eastwards within the north-eastern compartment.....	30
Plate 24: View south-westwards within the north-easter compartment, showing the historic flagstone floor, as well as the ledged timber plank door, set within a modern partition wall.....	30
Plate 25: The historic roof structure of the loft space, including hand sawn timber beams.....	31
Plate 26: View of the Grade II Listed Coggs well and Stables at Coggs well.....	32
Plate 27: View along the gravel access track, towards the Grade II Listed Stables at Coggs well, and the associated Grade II Listed Coggs well.	33
Plate 28: The 1838 Tithe Plan, showing the Grade II Listed Coggs well (The Genealogist).	36
Plate 29: The 1886 Ordnance Survey Map, showing the Grade II Listed Coggs well (The Genealogist).....	37
Plate 30: The Tytherton Lucas Conservation Area boundary (orange), with the Site location highlighted (red).	39

1. Introduction

- 1.1. Pegasus Group have been commissioned by Armstrong Architecture Limited to prepare a Built Heritage Statement to consider the proposed conversion of the Stables at Coggsell, Tytherton Lucas, Chippenham, Wiltshire, as shown on the Site Location Plan provided at Plate 1.



Plate 1: Site Location Plan.

- 1.2. The Site contains the Grade II Listed Stables at Coggsell (NHLE 1022444), and is located within the Tytherton Lucas Conservation Area. Within a 500m study area of

the Site, there are two Grade II* Listed Buildings, and nine Grade II Listed Buildings, including the Grade II Listed Coggsell, located adjacent to the Site to the east.

- 1.3. The proposed works would see the conversion of the Stables at Coggsell into ancillary accommodation.
- 1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 207 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹

- 1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 212 to 216 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.
- 1.6. As required by paragraph 207 of the *NPPF*, the detail and assessment in this Report is considered to be *"proportionate to the assets' importance"*.²

¹ Ministry of Housing, Communities & Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, December 2024), para. 207.

² MHCLG, *NPPF*, para. 207.

2. Proposed Development

- 2.1. The application proposals seek Planning Permission and Listed Building Consent for the conversion of the existing building to ancillary residential accommodation to include the replacement of the existing modern single storey addition and a programme of repair and restoration works including internal and external alterations.
- 2.2. The proposals are detailed on the accompanying application plans and summarised as follows:

Exterior Proposals

Roof structure

- Installation of two modest conservation roof-lights, on the south-western side of the roof.
- Strip and re-roof the building, including replacement of the existing concrete roof tiles and replace with new felt and clay double roman tile.

North-western elevation

- Installation of glazed screen within the projecting gable, including removal of existing modern timber doors.
- Retention and repair of the timber plank stable doors. Full-height infill glazing would be installed behind these retained doors.

- Removal of the existing three-light timber framed window, to be replaced with a smaller window, with timber lintel above retained.
- Timber boarding within gable top be replaced like for like and left to silver.

North-eastern elevation

- Replacement of the modern window with security wiring, with new single-light window.
- Removal of the modern narrow timber door to the loft space, to be replaced with a full-height glazed unit.
- Installation of glazed screens within the open bays of the existing garage, set behind the timber frame.

South-eastern elevation

- Removal of the modern timber plank and replacement with a glazed door, with timber lintel retained above.
- Installation of full-height glazing to the open-sided south-western lean-to.
- Timber boarding within gable to be replaced like for like and left to silver.

South-western elevation

- Replacement of existing lean-to extension with new timber clad, single storey addition with glazed screens and windows.
- Installation of full-height glazing to rear of existing modern range.

- Installation of partition walling within the south-eastern extension, for its use as a gym and boiler room.

Interior Proposals

Ground Floor

- Conversion of the core late 18th-century structure to include an open dining room/kitchen, master bedroom, en-suite, and shower room.
- Removal of the modern partition walling between the three interior ground floor compartments.
- Removal of the north-eastern extent of the ground floor ceiling structure, which is primarily formed of modern machine cut timbers.
- Installation of a spiral staircase to the loft space, within the central extent of the ground floor.
- Installation of partition walling within the north-eastern extent of the ground floor, to subdivide the space to form a master bedroom with ensuite, and a shower room.

3. Methodology

3.1. The aims of this Report are to assess the significance of the Stables at Coggsell and the contribution that the Site makes to the heritage significance of the surrounding built historic environment, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

3.2. This assessment considers built heritage matters only.

Sources

3.3. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- Historic maps and archival sources available via National Library of Scotland Maps and other online sources;
- Wiltshire Council's Planning History Records;
- Historic England Red Boxes for archival photographs; and
- Google Earth Aerial Imagery.

Site Visit

3.4. A Site visit was undertaken by a Heritage Consultant from Pegasus Group on 30th May 2025, during which the Site and its surrounds were assessed.

Photographs

3.5. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the Site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

3.6. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 1**. However, for clarity, this methodology has been informed by the following:

- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-*

Taking in the Historic Environment (hereafter GPA:2);³

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);⁴
- *Historic England Advice Note 1 (Second Edition) – Conservation Area Appraisal, Designation and Management* (hereafter HEAN:1).⁵
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);⁶ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁷

³ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2nd edition, Swindon, July 2015).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2nd edition, Swindon, December 2017).

⁵ Historic England, *Historic England Advice Note 1 – Conservation Area Appraisal, Designation and Management* (HEAN:1) (2nd edition, Swindon, February 2019).

⁶ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

⁷ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

4. Policy Framework

Legislation

- 4.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.⁸
- 4.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁹
- 4.3. Full details of the relevant legislation are provided in **Appendix 2**.

National Planning Policy Guidance

- 4.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*, an updated version of which was published in December 2024. The *NPPF* is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance

documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.¹⁰ The *PPG* also contains the *National Design Guide*.¹¹

- 4.5. Full details of the relevant national policy guidance are provided within **Appendix 3**.

The Development Plan

- 4.6. Applications for Listed Building Consent and Planning Permission within Tytherton Lucas are currently considered against the policy and guidance set out within the Wiltshire Core Strategy (adopted 20th January 2015).
- 4.7. Details of the policy specific relevant to the application proposals are provided within **Appendix 4**.

⁸ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁹ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹⁰ Ministry of Housing, Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 14th February 2024), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹¹ Ministry of Housing, Communities and Local Government (MHCLG), *National Design Guide* (London, January 2021).

5. Site Description and Planning History

Site Description

- 5.1. The Site contains the Grade II Listed Stables at Coggsell (NHLE 1022444), and is located within the Tytherton Lucas Conservation Area. Within a 500m study area of the Site, there are two Grade II* Listed Buildings, and nine Grade II Listed Buildings, including the Grade II Listed Coggsell, located adjacent to the Site to the east.
- 5.2. The Stables are located within the eastern extent of the small rural hamlet of Tytherton Lucas, Chippenham. The building is situated to the west of the Grade II Listed Coggsell, comprising the farmhouse which the building is historically associated with. The farmstead is accessed from a road to the north, via a gravel access track. This track links with a yard to the east of the Stables, as well as to the principal northern elevation of Coggsell and its front garden. The Site is bounded by agricultural field parcels to the north, west, and south-east.

Site Development / Map Regression

- 5.3. The Grade II Listed Stables at Coggsell date to the late 18th century, with the complex at Coggsell having origins in the early post-medieval period. The associated Grade II Listed Coggsell to the east of the Stables comprises an 16th-century house, with alterations and additions in the 17th, 18th and 20th centuries.
- 5.4. The first available cartographic source to depict the Stables is the 1838 Tithe Plan. This shows the building as forming part of a 'U' plan regular courtyard farmstead. The farmstead was owned and occupied by Anne Cook, with

the Stables recorded under Plot 61, notes as '*Yard Buildings*'. The Stables were shown as a rectangular structure, comprising the eastern wing of a 'U' plan range of buildings, within an enclosed yard, with adjoining wings connected at its western and northern corners.

- 5.5. The Tithe Plan depicts the Grade II Listed Coggsell to the east of the Stables, recorded under Plot 60, which is noted as '*House, Garden*'. A linear structure was shown attached to the southern side of the house, with a small and detached structure noted to the east. The farmstead was shown as surrounded by agricultural field parcels, noted as under the ownership and occupation of Anne Cook.

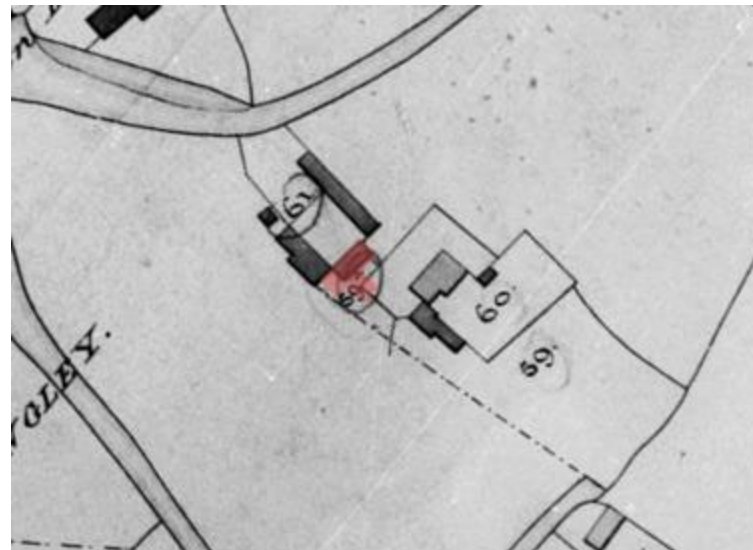


Plate 2: The 1838 Tithe Plan, with approximate Site location (The Genealogist).

- 5.6. The 1886 Ordnance Survey Map depicts a pump within the 'U' plan enclosed yard, and showed the present access track to the farmstead from the road to the north. This mapping shows that the track had extended further south-westwards beyond the complex, passing along the southern side of the Stables. The track also connected with an entrance yard/garden on the northern side of the Grade II Listed Coggsweil. The mapping also showed an orchard to the south-east of the farmhouse.

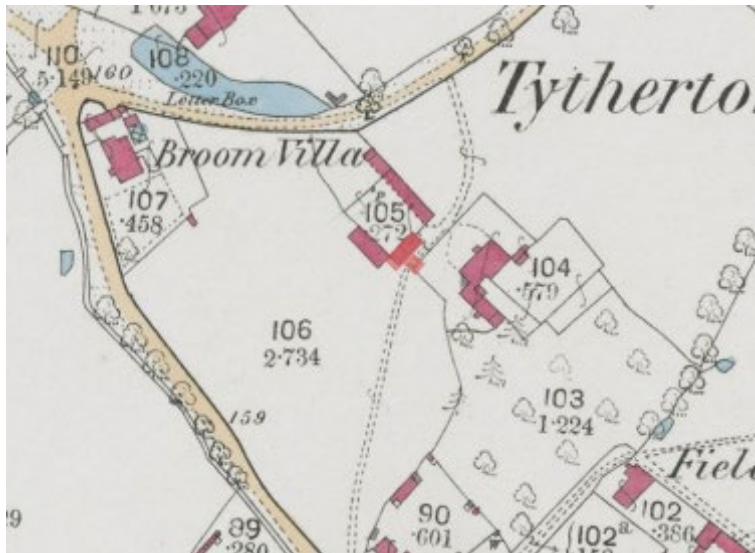


Plate 3: The 1886 Ordnance Survey Map, showing approximate Site location (NLSM).

- 5.7. By the time the 1900 Ordnance Survey Map was drawn, the access track no longer extended past the Stables, terminating at its eastern side. This mapping showed a rectangular yard was added to the south-western side of the Stables.

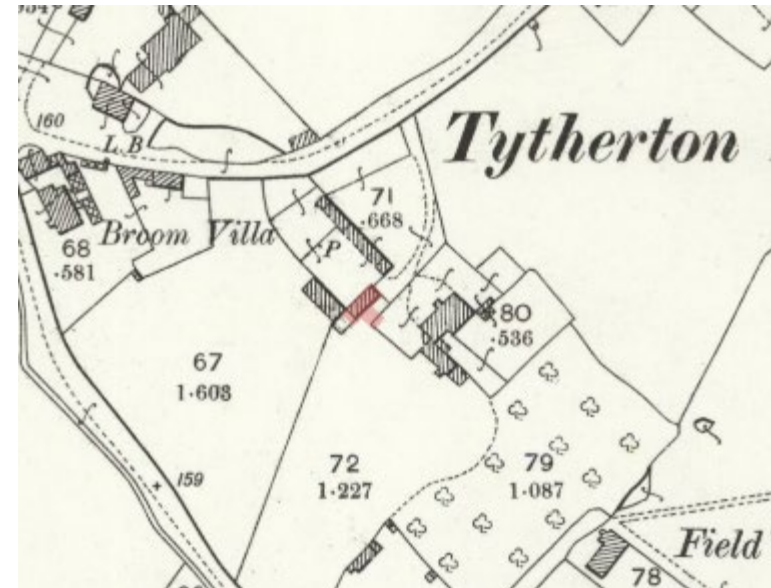


Plate 4: The 1900 Ordnance Survey Map, with approximate Site location (NLSM).

- 5.8. There had been limited changes to the farmstead in the early 20th century. The 1923 Ordnance Survey Map showing the addition of several small structures to the 'U' plan range, and the removal of the yard to the south-west of the Stables. By the time the 1960 National Grid Map was drawn, the northern wing of the 'U' plan range had been removed.

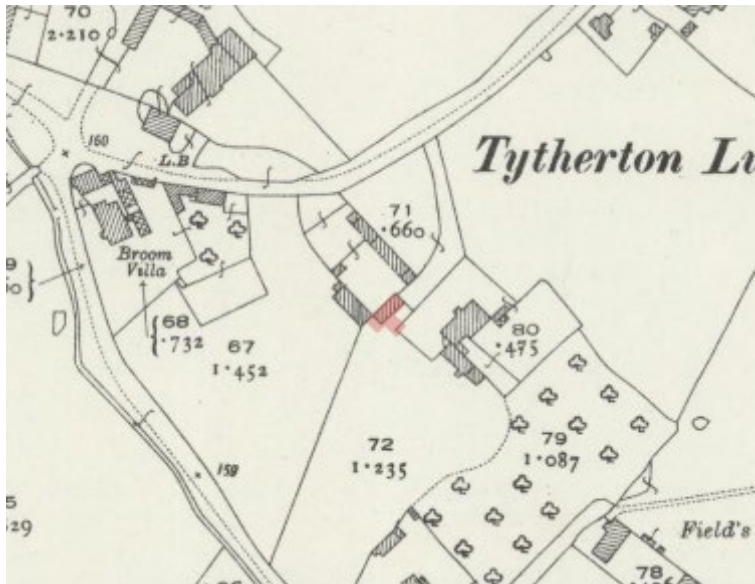


Plate 5: The 1923 Ordnance Survey Map, with approximate Site location (NLSM).

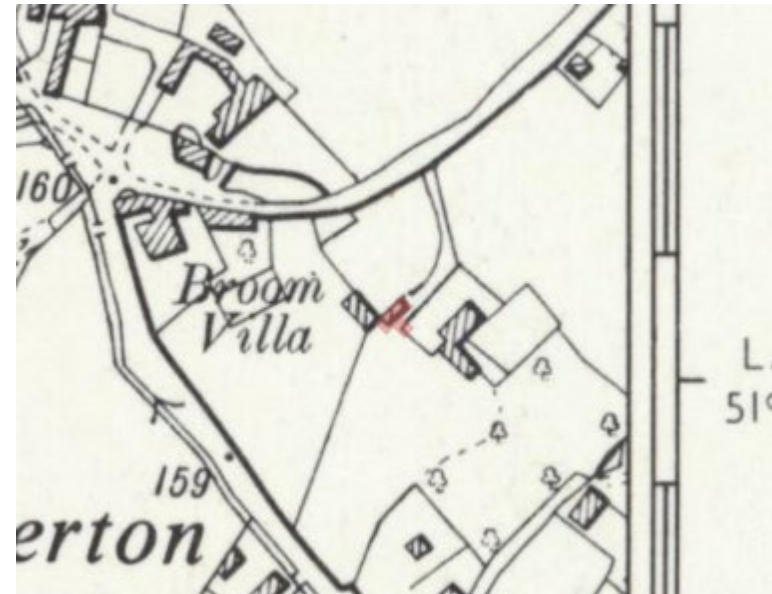


Plate 6: The 1960 National Grid Map, with approximate Site location (NLSM).

- 5.9. Further changes had taken place for the farmstead in the later 20th century. Satellite imagery from 1999 shows that the western wing of the previous 'U' plan range had been removed. A small lean-to structure added to the western side of the Stables, with a small flat-roofed structure added to the south-east. The land immediately adjacent to the Stables to the north was shown as an open field, and no longer former part of a yard. This imagery also shows that the orchard previously noted to the south of the farmhouse had been removed and replaced with field parcels. Within the wider surrounds, a tennis court had also been added to the west, separated from the farmstead by a field parcel.



Plate 7: Satellite imagery from 1999, with approximate Site location (Google Earth).

- 5.10. Satellite imagery from 2006 shows that the south-eastern flat roofed structure had been replaced with a pitched roof extension, associated with a Listed Building Consent application for the erection of a double garage (Application Ref. No. N/O4/OO680/LBC). A photograph of the building from 2006 also shows the new extension. The photograph shows the late 18th-century structure with half-hipped roof to the west, with a boarded up window and modern timber loft door on its north-eastern elevation. The garage extension is shown to the east, and included an open-frontage on its north-eastern side.
- 5.11. No other notable changes are identified for the Site and its immediate surrounds up to present day.



Plate 8: Satellite imagery from 2006, with approximate Site location (Google Earth).



Plate 9: Photograph of the Grade II Listed Stables at Coggsell, 2006 (Historic England).

Planning History

- 5.12. A review of planning history records held online by Wiltshire Council has identified a single relevant application for the Grade II Listed Stables at Coggsell.
- 5.13. This relates to the addition of a double garage extension to the south-eastern side of the building, which was approved on 5th October 2004 (Application Ref. No. N/O4/00680/LBC). These works also included external and internal alterations to the Grade II Listed Coggsell, located to the east of the Site.
- 5.14. The associated existing plans show the later 20th-century flat roofed structure noted on satellite imagery from 2009. This formed a small rectangular structure, which was open-sided to the north-east, and included two windows on its south-western side. The proposed plans show that the garage extension would be longer in length to the south-east, and would be built from stone walling, with an old clay tile roof, half-hipped to the south-east. The north-eastern elevation would be double fronted, with a central 'Y' oak post, on a concrete plinth.

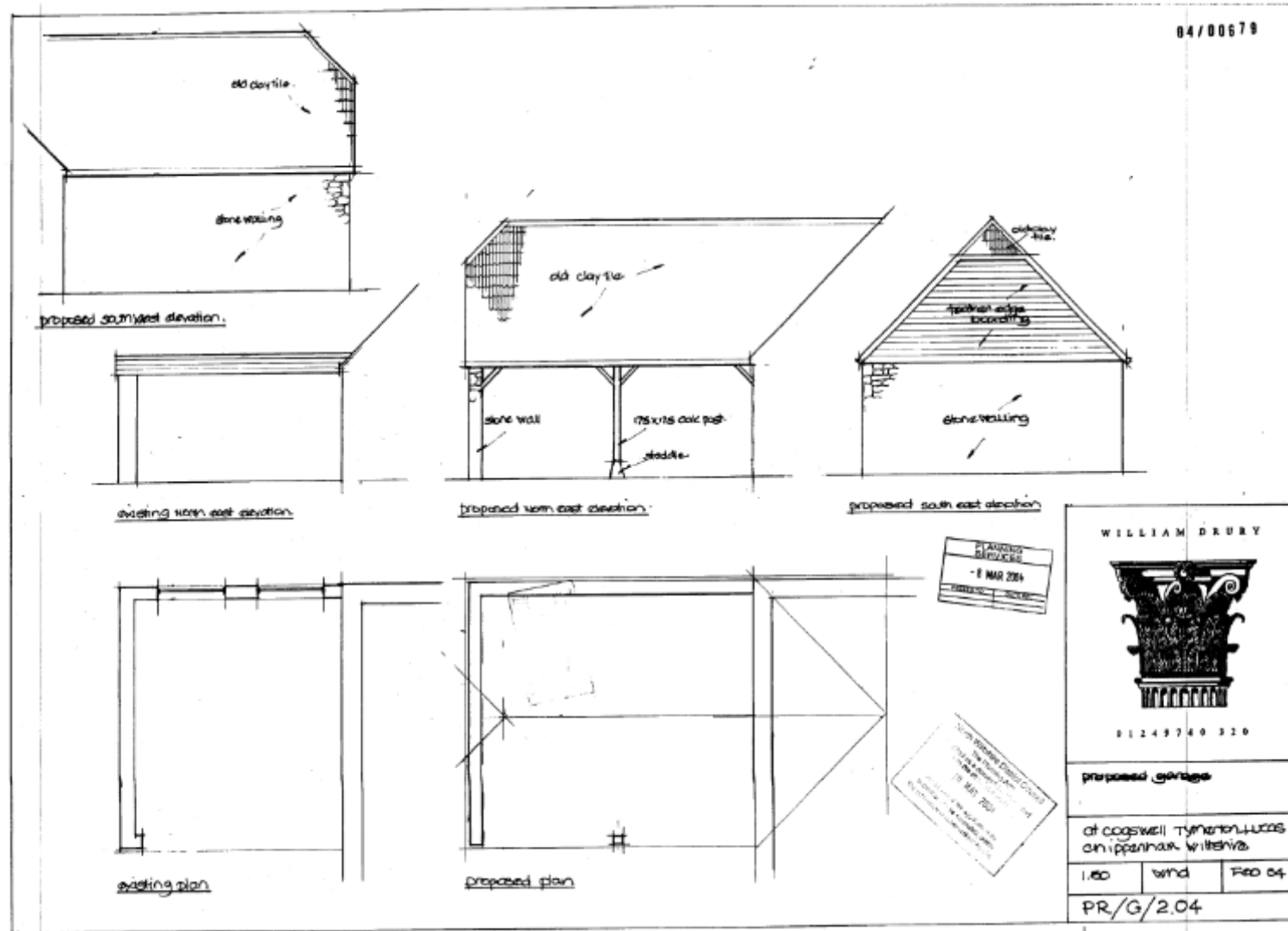


Plate 10: The existing and proposed plans for the double garage extension (Application Ref. No. N/04/00680/LBC).

5.15. The following applications were also identified for the Grade II Listed Coggsell, located adjacent to the Stables to the east.

- **N//87/02709** | Alterations to Listed Building | Approved with Conditions 10th May 2004.
- **N/04/03295** | Revised porch to Bakehouse | Approved with Conditions 12th January 2005.
- **14/08361/LBC** | Structural Repairs to Cellar | Approved with Conditions 19th December 2014.
- **PL/2022/07844 & PL/2022/07581** | Replacement of modern single-storey dining room on the same footprint. Works to replace existing C20 joinery to dormers and external doors, and re-lead damaged windows. New bathroom to attic | Approved with Conditions 8th February 2023.

6. The Historic Environment

- 6.1. The following Section provides an assessment of elements of the built historic environment that have the potential to be impacted upon by the proposed development.
- 6.2. As set out in **Section 1**, the Site comprises the Grade II Listed Stables at Coggsell, and is located within the Tytherton Lucas Conservation Area. It is also located adjacent to the Grade II Listed Coggsell. Accordingly, these assets are considered below with the level of assessment proportionate to the nature of change that would occur.
- 6.3. With regards to other heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development.¹²
- 6.4. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.
- 6.5. It is however widely accepted (paragraph 220 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.¹³ In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.
- 6.6. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.
- 6.7. Consideration, based upon professional judgement and on-Site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the Site as part of their setting, whether the Site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 6.8. With regards to other designated heritage assets, the Site does not form any part of the setting that positively contributes to their heritage significance due to the nature of the assets and a lack of visual connections, spatial relationships, and historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of these assets. Therefore, these have not been identified as sensitive to the development proposals, and will not be taken forward for further assessment.

¹² Historic England, *GPA3*, p. 4.

¹³ MHCLG, *NPPF*, para. 220.

Stable at Coggsell

6.9. The Stables at Coggsell was added to the National List at Grade II on 25th November 1987 (NHLE 1022444).

6.10. The List Entry describes the building as follows:

"Stable, late C18, rubble stone with Bridgwater tile half-hipped roof and weatherboarded end gables. Projecting gabled north side entry with weatherboard in gable, two north side stable doors and one south door. C20 east end outside stairs to loft door. Included for group value."

6.11. A full copy of the List Entry is included at **Appendix 5**.

Overview

6.12. The Stables at Coggsell dates to the late 18th century, comprising a single-storey broadly 'L' plan structure. The building functioned as stables with cart shed, with a loft above. The building includes a later 20th-century lean-to extension attached to its south-western side, as well as a double garage extension attached to its south-eastern side, added in c.2006. The building no longer functions as stables, and is currently used as a store.

6.13. Historic cartographic sources evidenced that the Stables had originally formed part of a 'U' plan courtyard range of buildings, with structures attached to its western and northern corners. The northern wing of the 'U' plan range was removed by the time the 1960 National Grid Map was drawn, with the western wing removed by satellite imagery from 1999.

6.14. The core late 18th-century building comprises a single-storey rectangular structure with loft space, built from rubble stone with lime mortar, and with dressed stone quoins. The building has a pitched half-hipped roof of Bridgwater tiles, and has a projecting gable with weather vane on its north-western side. The upper portions of the south-western and north-eastern side elevations, as well as the north-western projecting gable, contain timber weatherboarding.

6.15. The later 20th century lean-to structure to the south-west comprises a small, square, single-storey structure, built from timber weatherboarding. The south-eastern modern double garage comprises a single-storey rectangular structure, built from rubble stone. It has a pitched half-hipped roof, of modern clay tiles, with the upper portion of its south-eastern end built with timber weatherboarding.



Plate 11: The Grade II Listed Stables at Cogswell.



Plate 12: The Grade II Listed Stables at Coggsell.

Exterior

- 6.16. The principal north-western elevation includes double timber plank cart doors with long iron strap hinges, beneath the projecting gable. Adjacent to this to the west, there is an inserted three-light timber framed window, with timber lintel. The eastern extent of the elevation includes two sets of eaves height timber plank stable doors, each with long iron strap hinges, and with timber lintels. In front of this elevation, there is a section of cobbled stone flooring.
- 6.17. The north-eastern elevation has a square timber framed window, with modern glazing with security wire. The upper extent of the elevation includes a raised timber plank door to the loft space. A photograph from 2006 illustrates that this door was newly added at that time. The List Entry states that the eastern end dates from the 20th century, and included an exterior staircase, which are no longer extant.
- 6.18. The central extent of the south-eastern elevation of the Stables includes timber plank door with window featuring modern security wire glazing, and with timber lintel above. To the east of this, are two eaves height rectangular vents. The western extent of the elevation has been abutted by the double garage extension. This structure is open-sided to the north-east, and is double-fronted with a central 'Y' oak post on a concrete plinth
- 6.19. The south-western elevation has been abutted by the modern lean-to extension, with timber weatherboarding above. This lean-to structure has an aperture on its south-eastern side, and is used for storage. The double garage is attached to the elevation to the south-east. This elevation includes two lintels, evidencing the presence of earlier window apertures. Windows in this location were noted on the previously noted later 20th-century structure, within the Listed Building Consent application for the double garage, indicating that the earlier wall was utilised as part of the works.



Plate 13: The principal north-western elevation of the Grade II Listed Stables at Coggsell.



Plate 14: The north-eastern elevation of the Stables at Coggsell.



Plate 15: The south-western elevation of the Stables at Coggsell.



Plate 16: The south-eastern elevation of the Stables at Coggsell.

Interior

- 6.20. The interior of the Listed Building includes three compartments to the ground floor of the late 18th-century structure, with a loft space above. The south-western lean-to structure forms a single compartment, used for storage, with the south-eastern extension used as an open sided double-garage.
- 6.21. The south-western compartment appears to have historically functioned as cart shed, with more recent use for stabling. The space includes a walkway to the north-west, with two subdivided areas for stabling to the south-east. These areas include modern low-height timber stalls. The flooring of this space has been covered over with concrete, with the walls formed of whitewashed rubble stone. The ceiling structure within the compartment is comprised of modern machine cut timber joists.
- 6.22. The north-western wall of the space includes the double timber ledged and braced doors, as well as the three-light window. The walling beneath this window is constructed from modern concrete blocks, further evidencing that the window represents a later insert. Above the window there are timber pegs, used for hanging tack and saddle. On the south-western wall, there is a narrow timber plank door, which connects with the modern lean-to structure. The north-eastern wall of the compartment is modern, representing a later insert, and includes a timber plank ledged and braced door connecting with the central compartment.
- 6.23. The central compartment historically functioned as stables. The space includes a flagstone floor, with the south-eastern section of the flooring including cobbled

stones. The outer walls of the compartment are built from whitewashed rubble stone, with the internal walls formed of modern, plastered partition walling. The ceiling structure of the compartment is plastered, with a large, exposed hand-sawn timber beam, painted white. The space includes a stable door to the north-west, which has been boarded over internally. There are ledged and braced timber doors on the south-western and north-eastern walls, forming a through passage. The south-eastern wall includes a timber door with glazing light.

- 6.24. The north-eastern compartment historically functioned as stables. The space is formed of a rectangular space, with the flooring comprised of historic flagstones. The walls are primarily of whitewashed stone, with the south-western wall comprising a modern partition. The ceiling is plastered over, with an exposed hand sawn timber beam, and a modern timber access hatch inserted. The north-eastern wall includes a square timber framed window with modern security wire glazing. The south-western wall has a ledged timber plank door to the central compartment.
- 6.25. The loft of the Listed Building was historically accessed by exterior stairs on the north-eastern elevation, which are no longer extant. This space likely functioned as a hayloft or grain store. The space comprises a single rectangular space, open to the roof structure. This roof structure is formed of historic hand-sawn timbers. It includes three sets of principal rafters with collar beams, with a central ridge beam and two rows of purlins to each side. These support rows of tightly compacted hand sawn and narrow timber rafter beams. The loft space retains timber floorboards.



Plate 17: The walkway within the north-western extent of the south-western compartment, facing north-eastwards.



Plate 18: The inserted window with timber pegs above, and concrete block wall below, within the south-western compartment.



Plate 19: The modern partition wall and modern machine cut timber ceiling structure of the south-western compartment.



Plate 20: The south-western stall of the south-western compartment.



Plate 21: View south-eastwards within the central compartment, showing the flagstone floor, section of cobbled stones, and exposed timber beam.



Plate 22: View north-westwards within the central compartment.



Plate 23: View north-eastwards within the north-eastern compartment.



Plate 24: View south-westwards within the north-easter compartment, showing the historic flagstone floor, as well as the ledged timber plank door, set within a modern partition wall.



Plate 25: The historic roof structure of the loft space, including hand sawn timber beams.

Setting and Surrounds

- 6.26. The Stables at Coggsell are located within the western extent of a former farmstead, within the rural hamlet of Tytherton Lucas. The Grade II Listed Coggsell is located to the east of the Stables, and comprises a 16th-century house, with alterations in the 17th, 18th, and 20th centuries. The principal elevation of Coggsell faces north-westwards, towards its front garden, and towards the Stables. The south-eastern side of the house includes a rear garden, with its outer sides lined with trees.

- 6.27. The complex is accessed from the road through Tytherton Lucas to the north, which connects with a gravel access track, first noted on the 1886 Ordnance Survey Map. This track is lined with a metal estate fence, and is lined with trees, with field parcels beyond. The Stables and house are visible together in dynamic views moving southwards along the approach track, which include the surrounding agricultural fields, contributing a rural character.

- 6.28. The eastern side of the stables connects with a gravel yard off the access track, with the western and northern sides of the building bounded by agricultural field parcels.



Plate 26: View of the Grade II Listed Cogswell and Stables at Cogswell.



Plate 27: View along the gravel access track, towards the Grade II Listed Stables at Coggsell, and the associated Grade II Listed Coggsell.

Statement of Significance

- 6.29. The Grade II Listing of the building highlights it as a heritage asset of less than the highest significance, as defined by the NPPF.¹⁴
- 6.30. The heritage significance of the Stables at Coggsell is principally embodied in its physical fabric. It derives **historic interest** from its age, form, and associations. The building dates to the late 18th century, comprising stables and cart shed, with loft above. The building was historically associated and has **group value** with the Grade II Listed Coggsell, which dates from the 16th century. Historic cartographic sources evidence that the Stables had originally formed the eastern component of a 'U' plan range of buildings, which are no longer present.
- 6.31. The **architectural interest** of the building is principally embodied in its 18th-century vernacular style. The building is constructed from rubble stone with dressed stone quoins, and features a half-hipped roof with elements of timber weatherboarding. The building retains a range of original features, including flagstone and cobbled stone floors, as well as a historic roof structure comprised of hand sawn timbers. The building includes a range of alterations from the 20th century, which have had a negative impact on its architectural interest. This includes the concrete flooring and addition of modern internal partition walling.
- 6.32. The setting of the Stables at Coggsell also contributes to its significance, although the significance derived from the setting is less than that derived from its historic

fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:

- Grade II Listed Coggsell. The 16th-century house is located to the east of the stables, and comprises the house the building was built to serve. These buildings have group value and can be experienced in combination within the complex.
- The access track. The track was first noted on the 1886 Ordnance Survey Map, and provides access to the eastern side of the Stables. Views along the track on the approach to the Listed Building allow its vernacular style to be appreciated, in combination with the Grade II Listed Coggsell.
- The immediate surrounding agricultural fields. These fields were historically farmed by the farmstead, and help to denote the agricultural context of the Stables, contributing a rural character to how the building is experienced.

¹⁴ DLUHC, NPPF, para. 206.

Coggswell

- 6.33. Coggswell was added to the National List at Grade II on 25th November 1987 (NHLE 1199394). The Site is located c.15m to the west of the Listed Building.



- 6.34. The List Entry describes the building as follows:

"House, C16 and C17, rubble stone and timber-frame with stone slate roof, end stacks and rear stacks. Two storeys and attic, three hipped dormers, two with C18 leaded lights. Four-window front, main part timber-framed with rubble stone plinth and east end wall, the right end bay, possibly added in C17, wholly rubble stone. Late C18 sashes, 16-pane and two 12-pane

sashes to first floor of main part and paired 12-pane sashes each side of door in rendered stone slated porch. Right bay has 16-pane above and paired 12-pane sashes below. Framing has heavy wall-posts and one angle brace. East end outside stack and ground floor hollow-moulded mullion window. Rear has three gabled additions behind main range, C20 flat roofed extension behind right bay and to south west a one-room plan formerly detached cottage with south stack and hipped eaves dormer to west and east sides. Link between cottage and west end of house has a reset C16 or C17 studded plank door. Three gabled additions are early C18 to east with cyma-moulded recessed 2-light mullion window to first floor east and south, the south window altered to 12-pane sash; C17 to centre with hollow-moulded mullion windows, 2-light each floor and single light to attic and late C18 to right in red brick.

Interior: hall has rear wall stone chamfered Tudor-arched fireplace and east room has Tudor-arched fireplace with renewed timber lintel. Chamfered and stopped beams. Winding stair to rear with some plank panelling. Early C18 bolelection fireplace in south east rear wing and another similar in first floor west room. Five-bay tie-beam and collar truss roof, the west two bays possibly added. An inventory of Thomas Coggsell of 1616 records a hall, buttery and kitchen with rooms above the hall and buttery. Owned by the Crook family in C18."

- 6.35. A full copy of the List Entry is included at **Appendix 6.**

- 6.37. The Grade II Listed Coggswell dates to the 16th century, with alterations from the 17th, 18th and 20th centuries. The complex was historically associated with the Coggswell family, with Thomas Coggswell recording an inventory of the house in 1616, which included a hall, butter, and kitchen, with rooms above. In the 18th century, the house was owned by the Crook family.
- 6.38. Coggswell comprises a two-storey house with attic, which is 'L' shaped in plan, with a cottage and former bakehouse attached to its southern side. The earliest phase of the house is of timber framing, with a rubble stone plinth. The south-western end bay is of rubble stone, and was likely added in the 17th century. The building has a pitched stone slate roof, gabled to the south-west and north-east, with gable-end brick chimneystacks. The north-western side of the roof includes three hipped dormer windows.
- 6.39. The principal elevation of the building faces to the north-west, and is built partly of timber framing and partly of rubble stone. The elevation includes a pitched porch structure, as well as a range of 18th-century sash windows.
- 6.40. Historic cartographic sources evidence that the building formed a farmhouse in the 19th century, comprising part of a 'U' plan regular courtyard farmstead. The 1838 Tithe Plan notes that the complex was owned and occupied by Anne Cook. The farmstead was located within the south-eastern extent of Tytherton Lucas, to the south of the main road through the settlement. The 1886 Ordnance

Survey Map shows that the farmstead was accessed via a track to the north of house, which remains extant today. The mapping also shows a front entrance yard to the north-west of the house, with an orchard to the south-east.

- 6.41. The complex saw extensive changes in the 20th century, with the piecemeal removal of farm buildings, with the Grade II Listed Stables the only remaining farm building associated with the earlier 'U' plan range up to present day.

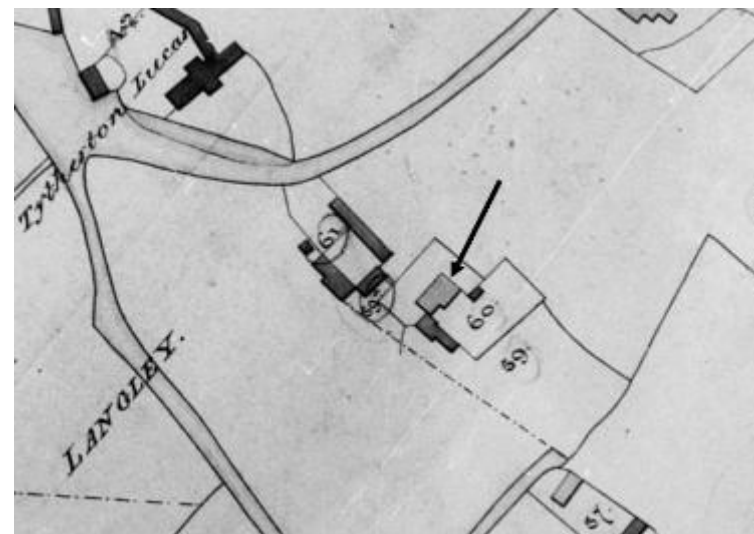


Plate 28: The 1838 Tithe Plan, showing the Grade II Listed Coggswell (The Genealogist).



Plate 29: The 1886 Ordnance Survey Map, showing the Grade II Listed Coggsell (The Genealogist).

Setting and Surrounds

- 6.42. The Grade II Listed Coggsell is located the eastern extent of a former farmstead within the rural hamlet of Tytherton Lucas. The complex is surrounded on all sides by agricultural field parcels, which were historically farmed by the owners and occupiers of the house.
- 6.43. The farmstead is accessed from the southern side of a road to the north, connecting with an access track noted on historic cartographic sources. This leads to the front garden and entrance to the house, with the principal elevation facing north-westwards. The south-eastern side of Coggsell includes a rear garden, with its outer sides lined with trees.

- 6.44. The Grade II Listed Stables at Coggsell are located to the west of the house, comprising the only surviving building of an earlier 'U' plan courtyard range.

Association with the Site, including Intervisibility and Co-visibility

- 6.45. The Site is located c.15m to the west of Coggsell, and comprises the Grade II Listed Stables at Coggsell. This building was historically associated with the house, forming part of the farmstead from the later 18th-century. The Stables represent the final surviving farm building within the complex, with the other structures noted on cartographic sources removed throughout the 20th century.
- 6.46. There is intervisibility between the Stables and house. The principal elevation faces to the north-west, with these views including the north-eastern side of the Stables.
- 6.47. There is also co-visibility between the Listed Buildings on the approach to the complex from the track to the north. The principal north-western elevation is visible in combination with the Stables' north-eastern and north-western elevations, in dynamic views moving southwards along the approach track. These views include the surrounding agricultural fields, which contribute a rural character. Historically, the north-western elevation would not have been visible in these views, and would have been screened by the former northern range of the 'U' plan courtyard.

Statement of Significance

- 6.48. The Grade II Listing of the building highlights it as a heritage asset of less than the highest significance, as defined by the NPPF.¹⁵
- 6.49. The heritage significance of Coggsell is principally embodied in its physical fabric. It derives **historic interest** from its age, form, and associations. The building dates from the 16th century, comprising a two-storey house with attic, which has seen alterations from the 17th, 18th and 20th centuries. The house was historically associated with the Coggsell and Crook families, and has **group value** with the Grade II Listed Stables to the west.
- 6.50. The **architectural interest** of the building is principally embodied in its vernacular style. The house is constructed from timber framing and rubble stone, and has a pitched stone slate roof, with hipped dormer windows. The principal elevation retains a range of 18th-century sash windows.
- 6.51. The setting of the Coggsell also contributes to its significance, although the significance derived from the setting is less than that derived from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its "*setting*") which are considered to contribute to its heritage significance comprise:
- The front and rear gardens. These are noted on historic cartographic sources, and are where the

building is best experienced from, and where its vernacular style can be appreciated.

- The Stables at Coggsell. The late 18th-century Stables are located to the west of the house, and were historically associated with Coggsell, which it was built to serve. These buildings have group value and can be experienced in combination within the complex.
- The access track. The track was first noted on the 1886 Ordnance Survey Map, and provides access to the north-western side of the house. Views along the track on the approach to the Listed Building allow its vernacular style to be appreciated, in combination with the Grade II Listed Stables.
- The immediate surrounding agricultural fields. These fields were historically farmed by the farmstead, and help to denote the agricultural context of Coggsell, contributing a rural character to how the building is experienced.

¹⁵ DLUHC, NPPF, para. 206.

Tytherton Lucas Conservation Area

- 6.52. The Tytherton Lucas Conservation Area encompasses the hamlet of Tytherton Lucas, Chippenham, Wiltshire. The original date of designation for the Conservation Area is unknown, and there is no appraisal document association with the Conservation Area. The Site is located within the central-eastern extent of the Conservation Area.



Plate 30: The Tytherton Lucas Conservation Area boundary (orange), with the Site location highlighted (red).

- 6.53. Tytherton Lucas was recorded in the Domesday Book of 1086, as 'Tedrintone', with the manorial affix from the 'Lucas' family. The earliest surviving building within the hamlet is the Grade II* Listed Church of St Nicholas (NHLE

1022442), which has origins in the 13th century, and which was rebuilt in 1802.

- 6.54. The settlement is otherwise formed of houses and farmhouses, with several dating from the 16th century, including the Grade II* Listed Manor House (NHLE 1363805), as well as the Grade II Listed Coggsell (NHLE 1199394). Further development took place in the 17th and 18th centuries, with establishment of additional farmsteads, including the Grade II Listed Bosmere Farmhouse (NHLE 1199400) and the Grade II Listed Curricomb Farmhouse (NHLE 1987).

Character and Appearance

- 6.55. The Conservation Area can be characterised as a small, rural settlement, with a range of vernacular farmsteads and houses, which is surrounded by open agricultural land.
- 6.56. An unnamed road passed through the Conservation Area, from its north-eastern corner, continuing to the historic core of the settlement to the south-west, which includes the Grade II* Listed Church, before extending to the south-east beyond the Conservation Area. There are a cluster of buildings within the historic core of the settlement, at the bend in the road before it extends to the south-east, with other historic farmsteads location further to the north-east along the road.
- 6.57. The Grade II* Church comprises a modest building, constructed from rubble stone with early Gothic arched windows. The historic buildings of the Conservation Area are otherwise of a vernacular style, constructed from a variety of timber framing, rubble stone, and brick. The

roofing materials are predominantly of stone slate and clay tiling, with examples of hipped and gabled roofing.

Statement of Significance

- 6.58. The significance of the Conservation Area is principally embodied in elements of its intrinsic character and appearance (described above). These elements include the historic built form contained within its boundaries, the relationship between the buildings, and elements of settlement layout, which together illustrate the development of the Tytherton Lucas Conservation Aea.
- 6.59. The most important elements of character and appearance can be summarised as follows:
- Its designated heritage assets, which are primarily of a traditional vernacular style.
 - The primary materials and detailing seen throughout, including timber framing, rubble stone, and brick.
 - The settlement pattern, with buildings localised around an unnamed road passing through the hamlet.
 - The agricultural fields within the Conservation Area boundary, which contribute a rural character to the settlement.

The contribution of the Site

- 6.60. The Site is located within the central-eastern extent of the Conservation Area, close to its historic core. The Site includes the Grade II Listed Stables at Coggsell, which

dates from the late 18th century. The building was historically associated with the Grade II Listed Coggsell, which comprises a 16th-century timber framed and rubble stone building, and one of the earliest surviving structures of the settlement.

- 6.61. The Stables at Coggsell are built in a traditional vernacular style, from rubble stone with dressed stone quoins, with its upper walling including timber weatherboarding. The building has a half-hipped roof of Bridgwater tiling. A modest timber lean-to was added to the building in the later 20th century, with a modern and traditionally designed double garage added to its south-eastern side in c.2006.
- 6.62. Visibility of the Stables at Coggsell from the main road through the Conservation Area appears to be largely screened by the tall hedgerows along the roadside perimeter of the complex. On the approach to Coggsell on the access drive, the Stables can be viewed with the main house, in combination with the immediate surrounding agricultural fields.
- 6.63. Overall, the Site is deemed to make a **moderate contribution** to the significance of the Conservation Area.

7. Assessment of Impacts

- 7.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the application for Listed Building Consent and Planning Permission, for the proposed works to the Grade II Listed Stables at Coggsell.
- 7.2. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.3. The statutory requirement set out in Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their settings. Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- 7.4. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Conservation Areas, and this needs to be

the primary consideration when determining the acceptability of the proposals.

- 7.5. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 214 and 215 of the *NPPF*.¹⁶ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 216 of the *NPPF*.¹⁷
- 7.6. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.¹⁸
- 7.7. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.¹⁹ In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:
- "...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."***²⁰

¹⁶ MHCLG, *NPPF*, paras. 214 and 215.

¹⁷ MHCLG, *NPPF*, para. 216.

¹⁸ MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹⁹ MHCLG, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

²⁰ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

7.8. This Section will consider each of the heritage assets detailed above and assess the impact of the proposed development, whether that be harmful or beneficial to the significance identified above.

7.9. Paragraph 220 of the *NPPF* states that it is necessary to consider the relevant significance of the element of the Conservation Area which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e., would the application proposals undermine the significance of the Conservation Area as a whole?²¹

7.10. This approach, and its compliance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, is supported by Case Law, with a 2020 High Court Judgement confirming that:

“Section 72 requires an overall assessment of the likely impact of a proposed development on the conservation area, and not just that part of it where the development site is located”.²² (my emphasis)

7.11. The proposed works would see the conversion of the Grade II Listed Stables at Coggsell to habitable accommodation, including the replacement of the existing single storey extension.

The Stable Building

7.12. The application proposals see the refurbishment and renovation of the existing building to provide ancillary accommodation to the principal dwelling, Coggsell. This will include the rebuilding of the existing south western flat roof addition.

7.13. The existing single storey south western addition is a modern addition of not historic or architectural interest in its own right and thus its demolition and reconstruction will not involve the loss of any historic fabric and not harm the significance of the Listed Building.

7.14. The proposed replacement addition sits within the existing footprint of the building with access provided to it via the existing internal doorway from the historic core of the building. The simple addition will be timber clad as existing which will be left to silver naturally with metal framed windows and glazed screen. The design and proposed use of materials will sit comfortably alongside the historic core of the building and allow the agricultural origins of the structure to remain clear, having no impact on the significance of the structure.

7.15. The south eastern wing which was constructed as a modern double garage, and of no historic or architectural interest in its own right being largely constructed of modern fabric, will be converted to provide a gym as well as maintaining its part use as a boiler room.

²¹ MHCLG, *NPPF*, para. 220.

²² *Spitfire Bespoke Homes Ltd v Secretary of State for Housing Communities And Local Government* [2020] EWHC 958 (Admin).

- 7.16. The open bays will be infilled with metal framed glazed screens which will be set back behind the timber posts and wind braces. The simple detail of the infilling of the bays of this modern addition will have no impact on the significance of the building as a whole.
- 7.17. A new opening will be created in the rear wall which is of modern construction thus the opening will not involve the loss of any historic fabric, and the simple design of the screen within the stone wall will have no impact on the significance of the building as a whole.
- 7.18. The existing fenestration to the historic core of the building will be maintained, with new, simple metal framed glazed screens set within the existing door and cart shed opening, deep within the reveals and the modern windows replaced with new metal framed units. The existing stable doors will be restored and rehung to act as shutters to the glazed screen. It is acknowledged that the cartshed doors are proposed to be removed, however it is not possible to retain these given the narrow nature of the projecting gable and in any case, these appear to be modern replacements.
- 7.19. The latest Historic England Guidance (Adapting Historic Buildings for Energy and Carbon Efficiency (HEAN 18) – July 2024) confirms the acceptability of the use of double glazing within historic buildings where it does not involve the loss of historic fenestration, as would be the case with the application proposals.
- 7.20. The previously replaced modern roof covering of concrete roof tiles will be beneficially replaced with clay tiles on the central roof slopes, with new breathable felt and insulation below, preserving the historic timber roof structure. Two new conservation style roof lights will be installed within the south eastern roof slope, sat between the existing principal rafters. The existing timber boarding within the gables will be replaced like for like and left to silver naturally. The stone walls will be repaired and repointed as necessary using lime mortar.
- 7.21. Internally it is proposed to reorganise the space to provide living accommodation with a mezzanine bedroom utilising the existing mezzanine level.
- 7.22. The existing modern partitions and mezzanine floor within the southwest bay will be removed to allow for a full height living space whilst a new spiral staircase will be added to provide access to the mezzanine level bedroom. New partitions will be installed below the mezzanine to provide a further bedroom and ensuite/shower room.
- 7.23. The building already has services running to it and thus these can be utilised and expanded as required without impacting on the historic interest of the building.
- 7.24. Overall, a light touch approach is to be adopted to the conversion works, with the focus being on the removal and replacement of modern elements of the building and the retention and restoration of the historic core and its associated fabric.
- 7.25. The conversion proposals will facilitate the beneficial repair and restoration of the Grade II Listed Building, preserving and enhancing its historic and architectural interest.

Coggswell

- 7.26. Whilst separately Listed, the former stables building positively contributes to the significance of Coggswell, being the final (albeit already altered) remnant of the associated agricultural buildings which served the property.
- 7.27. The proposals will facilitate a beneficial new and viable use for the building, and address some of the deteriorating fabric and incongruous previous additions / alterations.
- 7.28. The sympathetic conversion works which see the character and appearance of the historic core retained and restored as well as the replacement / reworking of the existing extensions to a higher specification and detail would serve to enhance the external appearance of the former stables building whilst retaining it several agricultural character and thus preserve and enhance the significance of the Listed Building.

The Tytherton Lucas Conservation Area

- 7.29. The existing stable building is considered to positively contribute to the character and appearance and thus significance of the Tytherton Lucas Conservation, albeit its current condition and lack of sustainable for the historic core of the building limits this contribution.
- 7.30. As set out above, the application proposals will preserve and enhance the external appearance of the former stable building, preserving its character as a part of the

former (now largely lost) agricultural grouping of buildings associated with the principal Listed Building.

- 7.31. The sympathetic conversion works would include the beneficial repair of failed/failing elements of the fabric of the building and replace incongruous or inappropriate materials with better quality and appropriate replacements.
- 7.32. The works would thus also beneficially preserve and enhance the contribution that the site makes to the character and appearance of the Conservation Area.

8. Conclusions

- 8.1. This Statement has been prepared to consider the proposed conversion, refurbishment and restoration of the Grade II Listed former stable building at Coggsell, including the replacement of the existing modern extension.
- 8.2. The property is also located within the Tytherton Lucas Conservation Area and directly adjacent to the Grade II Listed Coggsell, with which it was historically functionally associated with.
- 8.3. The proposals adopt a light touch approach, with the focus being on the upgrading of modern elements of the building and the retention and restoration of the historic core and its associated fabric.
- 8.4. The conversion proposals will facilitate the beneficial repair and restoration of the Grade II Listed Building, preserving and enhancing its historic and architectural interest.
- 8.5. The proposal are also considered to preserve the historic interest of the Grade II Listed adjacent Coggsell, as well as the character and appearance of the Tytherton Lucas Conservation Area within which the site is located.
- 8.6. As such, the proposed works are considered to accord with both the statutory requirements set out within the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as the national policy set out with the NPPF and relevant local policy.

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”²³

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁴

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²⁵ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²⁶

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.²⁷

²³ MHCLG, *NPPF*, Annex 2.

²⁴ Historic England, *GPA:2*.

²⁵ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²⁶ MHCLG, *NPPF*, Annex 2; MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

²⁷ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

Significance results from a combination of any, some, or all of the interests described above.

Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁸

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁹

Setting is defined as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”³⁰

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.³¹

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

²⁸ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

²⁹ MHCLG, *NPPF*, Annex 2.

³⁰ MHCLG, *NPPF*, Annex 2.

³¹ Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”³²

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 75 of the *NPPF*;³³
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 213 of the *NPPF*, comprising Grade II Listed Buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³⁴ and

³² Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.

³³ MHCLG, *NPPF*, para. 213 and fn. 75.

³⁴ MHCLG, *NPPF*, para. 213.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *“buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”*.³⁵

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

“...the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative

*assessment using professional judgement is inevitably involved.”*³⁶

This assessment of significance adopts the following grading system:

- **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.
- **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.
- **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of

³⁵ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

³⁶ International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

significance and are areas and elements that have potential for restoration or enhancement through new work.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*,³⁷ and
- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

"Within each category of harm (which category applies should be explicitly identified), the extent of

the harm may vary and should be clearly articulated."³⁸

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *"preserving"* means doing *"no harm"*.³⁹

Preservation does not mean no change, it specifically means no harm. GPA:2 states that *"Change to heritage assets is inevitable but it is only harmful when significance is damaged"*.⁴⁰ Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

³⁷ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁸ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁹ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

⁴⁰ Historic England, GPA:2, p. 9.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of “*what matters and why*”.⁴¹ Of particular relevance is the checklist given on page 13 of *GPA:3*.⁴²

It should be noted that this key document also states:

“Setting is not itself a heritage asset, nor a heritage designation...”⁴³

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

“Conserving or enhancing heritage assets by taking their settings into account need not prevent change”.⁴⁴

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴⁵

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

The *NPPF* (at Paragraphs 214 and 215) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴⁶

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 to 216.⁴⁷

The *PPG* provides further clarity on what is meant by the term ‘public benefit’, including how these may be derived from enhancement to the historic environment (‘heritage benefits’), as follows:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed

⁴¹ Historic England, *GPA:3*, p. 8.

⁴² Historic England, *GPA:3*, p. 13.

⁴³ Historic England, *GPA:3*, p. 4.

⁴⁴ Historic England, *GPA 3*, p. 8.

⁴⁵ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴⁶ MHCLG, *NPPF*, paras. 214 and 215.

⁴⁷ Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); MHCLG, *NPPF*, paras. 214 and 216.

private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
- ***reducing or removing risks to a heritage asset***
- ***securing the optimum viable use of a heritage asset in support of its long term conservation.***⁴⁸

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

⁴⁸ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁹ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 16 (2) of the Act relates to the consideration of applications for Listed Building Consent and states that:

“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁵⁰

Section 66(1) of the Act goes on to state that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁵¹

⁴⁹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁵⁰ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16(2).

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”⁵²

A judgement in the Court of Appeal (‘Mordue’) has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 215 of the current, revised NPPF), this is in keeping with the requirements of the 1990 Act.⁵³

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving

⁵¹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁵² Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

⁵³ Jones v Mordue [2015] EWCA Civ 1243.

or enhancing the character or appearance of that area.”⁵⁴

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵⁵

⁵⁴ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

⁵⁵ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (December 2024)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in December 2024. This replaced and updated the previous *NPPF* (December 2023). The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development."

For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting***

the overall scale, type or distribution of development in the plan area; or

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- a. *approving development proposals that accord with an up-to-date development plan without delay; or*
- b. *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. *the application policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations,*

making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”⁵⁶

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.”⁵⁷ (our emphasis)

The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage

⁵⁶ MHCLG, NPPF, para. 11.

⁵⁷ MHCLG, NPPF, para. 11, fn. 7.

assets and assets identified by the local planning authority (including local listing)."⁵⁸

The NPPF goes on to define a Designated Heritage Asset as a:

"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."⁵⁹

As set out above, significance is also defined 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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."⁶⁰

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 208 that:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on

a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."⁶¹

Paragraph 210 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- c. the desirability of new development making a positive contribution to local character and distinctiveness."***⁶²

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 212 and 213 are relevant and read as follows:

"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

⁵⁸ MHCLG, NPPF, Annex 2.

⁵⁹ MHCLG, NPPF, Annex 2.

⁶⁰ MHCLG, NPPF, Annex 2.

⁶¹ MHCLG, NPPF, para. 208.

⁶² MHCLG, NPPF, para. 210.

asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”⁶³

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”⁶⁴***

Section b) of paragraph 213, which describes assets of the highest significance, also includes footnote 75 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 214 reads as follows:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and***
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”⁶⁵***

Paragraph 215 goes on to state:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”⁶⁶

⁶³ MHCLG, NPPF, para. 212.

⁶⁴ MHCLG, NPPF, para. 213.

⁶⁵ MHCLG, NPPF, para. 214.

⁶⁶ MHCLG, NPPF, para. 215.

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 219 that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”⁶⁷

Paragraph 220 goes on to recognise that “not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance” and with regard to the potential harm from a proposed development states:

“Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”⁶⁸ (our emphasis)

With regards to non-designated heritage assets, paragraph 216 of NPPF states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁹

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Ministry of Housing, Communities & Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

⁶⁷ MHCLG, NPPF, para 219.

⁶⁸ MHCLG, NPPF, para. 220.

⁶⁹ MHCLG, NPPF, para. 216.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁷⁰

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm

may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁷¹ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁷²

“Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way.”⁷³

⁷⁰ MHCLG, PPG, paragraph 007, reference ID: 18a-007-20190723.

⁷¹ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁷² MHCLG, NDG, para. 46.

⁷³ MHCLG, NDG, para. 47.

It goes on to state that:

"Well-designed places and buildings are influenced positively by:

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.***

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."⁷⁴

⁷⁴ MHCLG, NDG, paras. 48–49.

Appendix 4: Relevant Development Plan Policies

Applications for Listed Building Consent and Planning Permission within Tytherton Lucas are currently considered against the Wiltshire Core Strategy (adopted 20th January 2015) as set out below.

Delivering strategic objective 5: protecting and enhancing the natural, historic and built environment

Core Policy 58: Ensuring the Conservation of the Historic Environment

Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. *nationally significant archaeological remains*
- ii. *World Heritage Sites within and adjacent to Wiltshire*
- iii. *buildings and structures of special architectural or historic interest*
- iv. *the special character or appearance of conservation areas*
- v. *historic parks and gardens*
- vi. *important landscapes, including registered battlefields and townscapes.*
- vii. *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 potential contribution of*

these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

- viii. *Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications "The Local Plan will protect the borough's unique and significant heritage assets through the protection and identification of designated and non-designated heritage assets* and their settings.*

Appendix 5: Stables at Cogswell List Entry

STABLE AT COGSWELL

Official list entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 1022444

Date first listed: 25-Nov-1987

List Entry Name: STABLE AT COGSWELL

Statutory Address 1: STABLE AT COGSWELL

Location

Statutory Address: STABLE AT COGSWELL

The building or site itself may lie within the boundary of more than one authority.

District: Wiltshire (Unitary Authority)

Parish: Bremhill

National Grid Reference: ST 94904 74281

Details

BREMHILL TYTHERTON LUCAS ST 97 SW 7/82

Stable at Cogswell GV II Stable, late C18, rubble stone with Bridgwater tile half-hipped roof and weatherboarded end gables. Projecting gabled north side entry with weatherboard in gable, two north side stable doors and one south door. C20 east end outside stairs to loft door. Included for group value.

Listing NGR: ST9490474281

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 316206

Legacy System: LBS

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



End of official list entry

Appendix 6: Cogswell List Entry

COGSWELL

Official list entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 1199394

Date first listed: 25-Nov-1987

List Entry Name: COGSWELL

Statutory Address 1: COGSWELL

Location

Statutory Address: COGSWELL

The building or site itself may lie within the boundary of more than one authority.

District: Wiltshire (Unitary Authority)

Parish: Bremhill

National Grid Reference: ST9493174276

Details

ST 97 SW 7/81

BREMHILL TYTHERTON LUCAS Cogswell

GV II

House, C16 and C17, rubble stone and timber-frame with stone slate roof, end stacks and rear stacks. Two storeys and attic, three hipped dormers, two with C18 leaded lights. Four-window front, main part timber-framed with rubble stone plinth and east end wall, the right end bay, possibly added in C17, wholly rubble stone. Late C18 sashes, 16-pane and two 12-pane sashes to first floor of main part and paired 12-pane sashes each side of door in rendered stone slated porch. Right bay has 16-pane above and paired 12-pane sashes below. Framing has heavy wall-posts and one angle brace. East end outside stack and ground floor hollow-moulded mullion window. Rear has three gabled additions behind main range, C20 flat roofed extension behind right bay and to south west a one-room plan formerly detached cottage with south stack and hipped eaves dormer to west and east sides. Link between cottage and west end of house has a reset C16 or C17 studded plank door. Three gabled additions are early C18 to east with cyma-moulded recessed 2-light mullion window to first floor east and south, the south window altered to 12-pane sash; C17 to centre with hollow-moulded mullion windows, 2-light each floor and single light to attic and late C18 to right in red brick. Interior: hall has rear wall stone chamfered Tudor-arched fireplace and east room has Tudor-arched fireplace with renewed timber lintel. Chamfered and stopped beams. Winding stair to rear with some plank panelling. Early C18 bolection fireplace in south east rear wing and another similar in first floor west room. Five-bay tie-beam and collar truss roof, the west two bays possibly added. An inventory of Thomas Cogswell of 1616 records a hall, buttery and kitchen with rooms above the hall and buttery. Owned by the Crook family in C18.

Listing NGR: ST9493174276

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