

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/00390
Pre-application for change of use from class C3, 4 bedroom house to class C4, 5bedroom house of multiple occupancy
16 Budbury Place, Bradford On Avon, BA15 1QF

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

Recommendations:

☒	Comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 requires that **special regard** be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-216 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

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

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered: The site is a Grade II listed building located in Bradford On Avon Conservation Area.

Proposal: The proposal seeks pre-application advice for change of use from class C3, 4 bedroom house to class C4, 5bedroom house of multiple occupancy.

Relevant planning history: 20/09524/FUL - Change of use from a 4 bed house to a 5 bed house for multiple occupancy (approved); W/79/00889/FUL - Conversion to three dwellings (approved).

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

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. The current statement incorporates some analysis of character but a future application will need to be accompanied by an assessment which should be allowed to inform the proposals.

Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, whilst the applications are accompanied by a "Design, Access and Heritage Statement" the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, the applications are accompanied by a "Design and Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting (as appropriate): The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological**, **architectural**, **artistic** or **historic**. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area. etc

The rear of the building has, however, been compromised by extension and alteration during the modern period and is of lesser interest.

The interior retains a good set of historic joinery

The circulation pattern remains largely unaltered

Assessment: The subject building is a Grade II listed building and it is within the Bradford on Avon Conservation Area.

The Design & Access Statement that accompanies this application states that there are no external alterations proposed to the property. However, it does not mention whether it is proposed to make any interior changes to the listed building. From assessing the existing and proposed floor plans submitted, it does not appear that any interior alterations are proposed. As such could this please be clarified?

Providing that no alterations to the fabric of the building are proposed, the character and appearance of the property would remain as a residential property and the application would not result in harm to the conservation area or significance of the listed building.

As such providing that the proposal is not making any exterior or interior changes to the building this would be acceptable and complementary to the heritage assets.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

Clarification is required as to whether and internal changes are proposed to the listed building. If no changes are proposed, the impact of the proposal on heritage assets will be neutral and the requirements of current conservation legislation, policy or guidance will be met and there will be no objection to the application.