

Wiltshire Council Planning Consultation Response

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Officer's Name: David Cox
Officer's Title: Planning Officer

Application No: PL/2025/09476
Conversion and extension of outbuildings to form annex with hobbies workshop and sewing room.
69 High Street, West Lavington, Devizes, SN10 4JB

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

Recommendations:

☐	No 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 property No. 69 High Street is a Grade II listed building located in West Lavington Conservation Area. The property also affects the setting of numerous other listed buildings in the locality. The outbuildings associated with this application are curtilage listed buildings and appear from historic maps to originally have formed part of the outbuildings of Home Farm.

Proposal: The proposal seeks the conversion and extension of the outbuildings to form an annex with hobbies workshop and sewing room.

Relevant planning history: none

Issues: impact on the curtilage 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. 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 application is accompanied by a "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.

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: 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 vernacular architecture - its form, layout and architectural expression/detailing and use of traditional

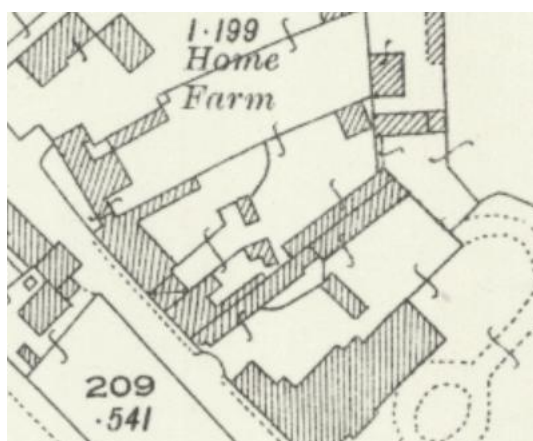
vernacular materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

Assessment: No 69 is a Grade II listed building, as its neighbours 63-65 High Street and West Lavington Manor. The application site is also within the West Lavington and Littleton Panell Conservation Area.

The two barns form part of a rear private courtyard associated with the property, however, historically the structures were part of outbuildings associated with Home Farm. The properties are both considered curtilage listed since they pre-date 1 July 1948 as shown in the historic maps below:



First Ed OS Map



Third Ed OS Map

The proposal seeks the conversion and extension of the outbuildings to form an annex with hobbies workshop and sewing room.

No Listed Building Consent has been submitted to support this planning application and this is a statutory requirement for any works to a curtilage listed building. I understand that this has been requested.

However ahead of this being submitted, I thought it helpful to provide a consultation response on the basis of the information submitted with the current planning application. A more detailed response will be provided once the LBC is submitted and is accompanied with the required level of details for the proposed conversion, as set out below.

Firstly, the Heritage Statement submitted with the planning application is wholly inadequate as it provides very 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.

The significance of traditional farmsteads and farm buildings is evidenced in the Wiltshire & Swindon Farmsteads Study (2013) which provides detailed guidance on building typologies and the significant contribution that farmsteads make to character and local distinctiveness, in addition Historic England have produced extensive guidance on the importance of farm buildings and their sensitive repair and conversion, such as 'Adapting Traditional Farm Buildings Best Practice Guidelines for Adaptive Reuse' (2017).

Historic England in their publication state that there are a number of key common issues to consider when look to adapt and convert historic farm buildings, these are:

- i) Understanding the construction and condition - Survey drawings and a schedule of condition will need to be prepared to establish the extent and nature of the repairs required and the associated costs.
- ii) Respect the architectural and historic interest of the building - Any adaptation will need to strike a balance between the practical requirements of a new use and protection of the historic character of the existing farm building and its setting.
- iii) Understanding the setting - A good understanding of the building's relationship with its surroundings is required to conserve and enhance the relationship with the landscape. This should inform detailed design decisions about spaces, curtilage, access, visual impact and enclosure.
- iv) Achieving a high standard of design, repair and craftsmanship - Assessing the impact of changes and carrying out sensitive design and repairs requires the skill and knowledge of those qualified and experienced in conserving historic buildings.
- v) Minimising alterations and loss to significant historic fabric - Retention of as much significant historic fabric as possible is a fundamental part of any good adaptation.
- vi) Retain distinctive features - Historic farm buildings invariably retain features that provide evidence of their former use and contribute to their significance. They may range from a simple series of ventilation slits formed in the masonry structure to vertically boarded doors to a cart entrance. Retaining such features contributes to a successful adaptation.
- vii) Considering how to introduce light - One of the greatest challenges with many adaptations is to increase daylight without compromising the building's external appearance.
- viii) Considering the level of subdivision - Another difficult aspect of farm building adaptation can be the incorporation of functions that require subdivision of the existing open spaces.
- ix) Considering how services and insulation will be incorporated - Most new uses have some service requirement and will need to comply with Building Regulations (Part L) for adequate levels of energy efficiency. These need to be incorporated so as not to damage historic fabric or features of interest.
- x) Considering extensions - Avoid the construction of extensions that compromise the character and setting of the farm building. If a significant extension is required for adapting the building to a new use, that use may not be the most suitable one for the building
- xi) Re-use and retain minor outbuildings - Minor outbuildings provide important evidence of how a farmstead evolved over time and should be retained if they contribute to the farmstead group. Some can be difficult to convert but others can be put to good use for parking, storage or services.
- xii) Retaining and encouraging wildlife habitats - Establish what wildlife gains benefit from the farm buildings to be converted, particularly if there are any protected species. Explore opportunities for creating wildlife habitats that are in keeping with local landscape character and biodiversity action plans.

Regarding the above key issues set out by Historic England, the drawings as submitted fall short in almost every aspect (see text underlined above) and I have a number of significant conservation concerns regarding this application and consider that this application falls short in every aspect, in particular:

- Overall, the lack of essential information and details for the proposed conversion of the outbuildings – detailed structural survey of condition of existing building; demonstration that the buildings are capable of reuse without substantial alteration and rebuilding; schedule of repairs; drawings showing proposed insulation and thermal upgrade of the structures; drawings showing proposed installation of modern services; and details evidencing the retention and encouragement of wildlife habitats.
- There are no survey drawings or schedule of condition to establish the extent and nature of the repairs required.
- The significance, character and form of the existing outbuilding will be undermined by extensions to these heritage assets. The stable and shelter shed outbuilding which would no longer maintain its historic linear form.
- Distinctive features are not being maintained, existing openings are not being utilised and random new openings are being inserted into historic fabric. This will not retain the original character and form of the buildings.

Also, whilst there is a proposed block plan, no existing block plan has been submitted and it is therefore difficult to ascertain how this proposed intensification of use will impact on the setting of the listed buildings through the courtyard being dominated by parked cars, bins etc. Whereas currently the buildings can be used as storage, workshop and carports.

In addition, no wildlife surveys have been submitted and these surveys are needed to establish if this proposal has any implication for protected species.

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.

As such, I am concerned at the wholly inadequate level of information submitted for this proposal, the lack of a LBC application and a Heritage Statement that conforms to the requirements of Para 207 of the NPPF.

This lack of information and this un-informed proposal will result in harm to the curtilage listed buildings via the loss of historic fabric, via change to layout/plan form and inappropriate changes to the original external form of the buildings. The proposals involve only part of the buildings and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of important historic fabric and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Section 16 of the Act requires that any level harm caused should be taken seriously.

In addition, the proposals will result in harm to the character and appearance of the conservation area via inappropriate changes to the original external form of the curtilage listed buildings. The proposals involve only part of the conservation area and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve inappropriate alteration to curtilage listed buildings comprising a former historic farmstead which makes a positive contribution to this designated heritage asset and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special attention' by Section 72 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 208 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case the works and the proposals are articulated as being primarily for the convenience of the owners of the farmstead i.e. a private benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.