

Wiltshire Council Planning Consultation Response

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Officer's Name: Alex Edge
Officer's Title: Planning Officer

Application No: PL/2026/00424 (LBC) and PL/2026/252 (PP)
Proposed change of use from storeroom/ outbuilding to residential (one bedroom flat) + added dormer
Longfield House, Store Buildings At, Mortimer Street, Trowbridge, BA14 8BG

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.

National Policy and guidance: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving listed buildings, their settings or any features of special architectural or historic interest which they possess.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-16 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.

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.

Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition) provides additional advice and notes that “The importance [of setting] lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Local Policy: 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.

Proposal: The application proposes further alterations to an existing outbuilding to Longfield House to create an additional unit of residential accommodation.

Relevant planning history: 20/04948/FUL & 20/05713/LBC - Retrospective conversion of the east wing into three flats and partial conversion and enlargement of the former store/garage buildings into two residential units. Demolition of unauthorised conservatory and other associated alterations and works. PL/2021/08725 – amended the details for the approved footway and landscape layout.

Issues: impact on the listed building, and character of the area.

Site: the site is within the grounds of Longfield House, historically a detached house of some status and architectural quality, set within a designed walled garden. The house is listed at Grade II and whilst the list description notes that it is of late C18 date with an early C19 addition, more recent research suggests that it may be slightly later, perhaps dating to the early C19 with a more immediate extension c. mid C19.

The original (western) half of the building was built in the late Regency classical style and extended with a significant additional block in Italic style, reportedly for a music instrument dealer, Francis Hallet. Historically, the property was accessed from Mortimer Street to the west, via a gated entrance in the stone boundary wall (the gate and piers are separately listed at Grade II but altered on construction of the relief road).

The current application relates to the central section of a modern structure built as an outbuilding against the historic southern garden boundary wall to the plot. It is located immediately to the rear of the house separated only by a short distance and a modern 'colonnade' structure built from architectural salvage.

The List description reads as follows:

MORTIMER STREET 1. 5411 (South East Side) Longfield House ST 8557 7/39 29.12.50. II

2. Late C18 with early C19 additions. 2 storeys and attic. Ashlar stone on projecting plinth. String at 1st floor level. Rusticated angle pilasters. Moulded cornice and parapet with projecting coping. Slate roof. 3 windows, glazing bar sashes 4 panes wide, with moulded jambs and voussoir heads on 1st floor. 2 similar windows on ground floor. Central 6 panel door with arched radiating fanlight and in delicate stone Doric porch of 2 columns, wall pilasters and entablature with architrave enriched with key pattern ornament, pulvinated frieze and small cornice; glazed roof; all approached by 4 steps. Wrought iron dog gates to door. Early C19 extension wing projecting to left, 3 arched windows with raised stone surround and key blocks. Also rustic quoins.

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, the applications are accompanied by a "Planning, Design and Access Statement" and a "Heritage Impact Statement" and whilst these documents provides limited objective information about the historic or architectural interest of the heritage assets, the proposals themselves are easily understood. It is also the case that a more thorough Heritage and Significance Statement was submitted to accompany the 2020 regularisation applications and this has been of further assistance in assessing the current applications. 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.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

In this case the significance of the primary listed building, Longfield House, 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. The original encircling stone walls and remnants of the access gateway are separately listed and also of interest. They reflect the original extent and layout of the property which was carefully designed and laid out to complement the architectural status of the house, in the picturesque style with a sweeping access driveway through the gardens.

The current applications relate to outbuildings sited to the rear (south) of the main house which are built against the historic boundary wall to Longfield House and hence considered to be 'part' of the listed building for the purposes of Section 1 (5) of the Act as a result of this attachment. The buildings themselves appear to have been constructed post war, are of poor quality materials and design and hold no significance in themselves. Sections of the building to either side of the current site were converted without consent to residential use during the 1980s, with the works later regularised under the application quoted above.

The surroundings of the property have been very significantly altered and eroded by successive changes to the road layout over many years. The house now occupies the centre of a roundabout junction on the main relief road. The new access off the relief road roundabout is directly to the north and brings the visitor straight to the front of Longfield House. These changes have harmed the setting, diminishing the understanding and significance of Longfield House's siting and orientation. This harm has been added to by the development of a pair of detached dwellings in the grounds to the north-east (historically outside the property boundary) which now compete in the setting to the new entrance. Further changes to create multiple occupancies within the house and associated buildings, have led to a need for substantial areas of parking in front of the main house which have continued the incremental erosion and decline of the building's setting. However, the remaining garden area is heavily treed, including a number of non-native specimen trees (as well as self-seeded sycamore etc.) and these provide some visual and acoustic defence from the heavy traffic on the encircling roads whilst also remaining legible as the former garden plot. A collection of garden structures of relatively recent date are constructed from architectural salvage and contribute to the character of the site. The remaining garden, which has much potential for enhancement, provides the ability to appreciate the asset within its historic designed setting and makes a significant contribution to the overall significance of the property. From out side the site, it also has some value in appearing as a green 'oasis' in an otherwise hard-edged expanse of roads and junctions.

Assessment: the existing structure is the centre section of a modern outbuilding constructed against the historic boundary wall. The sections to either side have each been raised to create a modest first floor via the addition of what is effectively a large flat-roofed dormer across their full width. The outbuilding is of no heritage significance and poor appearance and makes, at best, a neutral contrition to the setting of the primary asset. It is understood that the existing units were regularised as part of a package of works which repaired the site and brought the main house back into reasonable condition after a period of dereliction

and that this was considered to provide some mitigation for their poor design. The design of the proposed upward extension to the remaining central unit is similarly poor and entirely out of character with the architectural quality of the main house.

Taking into account though that the units to either side have already been converted in similar fashion, the additional impact stemming from the actual works required to create the new dwelling will have only a modest additional harmful impact on the setting of the house via the increase and consolidation of poor quality construction within its immediate setting, albeit to its rear which is of less significance. Further harm will, however, result from the need to provide additional parking to serve the apartment, on a site which is already blighted by the extensive areas of hardstanding and the presence of numerous parked cars in front of the main house and its principal elevation. Taking in combination, the impacts of the proposal will be negative, resulting in some harm to the remaining significance of the listed building. As the works affect only part of the site and are simply a continuation of existing works, they should be seen as 'less than substantial' for the purposes of interpreting the NPPF and perhaps at the lower/medium level of this category.

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 and that "This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

The proposals will result in a level of harm to the significance of the main listed building via the incremental erosion of its setting from additional poorly designed development and from the need to accommodate further parking. It is noted that the proposals represent only a modest extension of existing development in similar style but they contribute to a continuing process of erosion of the primary building's setting which, cumulatively, impacts on its significance. Paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, but in this case there will be no heritage benefits which would result from the development.

As a result from a conservation perspective, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore object to the application.

It is noted that final planning balance will fall to the Case Officer and it should be noted that whilst the proposals can be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level of harm caused should be taken seriously and significant public benefits would be required to offset the harm that would be caused.