

Wiltshire Council Planning Consultation Response

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Fiona Webb
Senior Conservation Officer (Consultant)
Wiltshire Council Conservation (Central)

Officer's Name: Steven Vellance
Officer's Title: Planning Officer

Application No: PL/2026/01258
Provision of an off street parking space
The Railings, 5A Frome Road, Bradford On Avon, BA15 1LB

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 property is a Grade II listed building located in Westbury Conservation Area. The property also affects the setting of numerous other listed buildings in the locality.

Proposal: The proposal seeks to replace the existing gloss white wooden windows which are beyond economical repair by substituting with upvc box sash windows on front elevation (No.5 windows).

Relevant planning history: PL/2024/01233 - Extension and material change of use of existing ancillary building to separate dwelling (approved).

Issues: impact on the non-designated terrace, 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, the application is accompanied by a "Design, Access 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: 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 application site is an outbuilding within the curtilage of an unlisted property located to the south of the town. The building has recently been granted permission to be converted to a one bedroom dwelling and lies behind an existing historic boundary wall and adjacent to the gable end of a 19th century terrace. The terrace is noted as local interest buildings in the adopted CA Character Assessment. The local limestone construction of the boundary wall and adjacent terrace are strongly characteristic of Bradford as a whole.

Assessment: The proposal is for an off street parking space for the new separate dwelling as approved 21 March 2024, planning reference PL/2024/01233.

The wall is an important feature in the conservation area and its limestone construction encloses the street scene. No clear justification has been given for the partial loss of this feature which makes a positive contribution to the conservation area and as to why the car parking space is necessary. In particular since the dwelling was allowed recently without this provision, presumably since the site is in a sustainable location within a town centre.

It is also noted that the site appears to be adjacent to existing on street parking zone and as such it is unlikely that a dropped kerb could be provided for such an entrance.

Clear justification is therefore needed as to how this level of harm would be offset by public benefits in order to meet the requirements of current conservation legislation, policy or guidance.

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.

Further justification is required.