

Wiltshire Council Planning Consultation Response

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Wiltshire Council Conservation (Central)

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Officer's Title: Senior Planning Officer

Application No: **PL/2026/00280**
Proposed Erection of 2 Semi-Detached Dwellings with associated landscaping
15 Castle Street, Trowbridge

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

Recommendations:

☐	Comment
☐	Support
☐	Support subject to conditions (please 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. Sections 66 requires that **special regard** be given to the desirability of preserving listed buildings and their settings.

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 12 sets out policies in relation to design and Section 16 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. 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.

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."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments.

Site: a gap site occupied by a temporary structure within the conservation area on a main street at its approach to the town centre. Opposite, the eastern side of the street is occupied by a long terrace which includes a number of listed weavers' dwellings directly opposite the site. Historically the site was occupied by a terrace of dwellings.

The current structures and use of the site have an untidy and poor-quality appearance which detract from the character and appearance of the conservation area and mean that it fails to make any positive contribution to the significance of the nearby listed buildings.

Proposal: the application seeks consent for a pair of semi-detached dwellings set back from the street with parking in front. A scheme for 6 flats within a block has which matched the appearance of the neighbouring new build block has previously been granted approval.

Issues: impact on the conservation area. Impact on the setting of the nearby listed buildings.

Assessment: the proposals seek consent for the construction of a pair of semi-detached dwelling with a similar overall appearance to the relatively recently constructed block of flats on the neighbouring site.

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, no heritage statement has been submitted and there is nothing providing any assessment of the historical development of the site or objective assessment of impact and it has not been demonstrated that this has been understood. Paragraph 208 of the NPPF also provides for the local planning authority to make its own assessment of impact and the following heritage comments are offered on this basis.

The current structures and use detract from the area and their removal is welcomed. There is no objection in principle to the use of the site for residential purposes as this echoes its historic use.

It is entirely regrettable that this site has come forward separately from the adjacent site. The result illustrates the downside of piecemeal incremental development as the opportunities that a comprehensive redevelopment of the wider site would have offered for the enhancement of the area are now lost. It is also regrettable that an appropriate heritage statement has not been used to inform the nature of the proposed redevelopment. This could have resulted in a scheme which better reflected the historic layout, grain and character of the historic area, and which reinforced local distinctiveness as intended by the NPPF. Instead, the proposal simply repeats the general form of the neighbouring scheme whilst pushing it back within the site to allow parking in front. The result is a pastiche design which poorly reflects the historic layout and character of the site and of remaining historic development in the vicinity. Whilst the drawings are at small scale and lack detail to allow the design to be fully assessed, the wide gable span of the block, lack of chimneys and the location within the site in a car dominated arrangement are features of the scheme which are particularly at odds with surrounding development and which significantly reduce the quality of the development when compared to the previously approved scheme.

In summary, the proposed development represents a poor design which is out of character with historic development in the area and which would lead to the erosion of the character and appearance of the area and setting of the listed buildings located opposite and which will diminish the significance of these assets. The proposals are therefore at odds with Section 66 and 72 and with CP58 and CP57 which requires a high standard of design in all new development. It is noted that the site is currently scruffy and in need of upgrading, such that it fails to contribute positively to the significance of the identified designated assets (CA and LBs). However, the current scheme fails to take the opportunity offered to improve the situation as anticipated by Paragraph 210 of the NPPF.

The development only relates to a small area within the conservation area which is already in poor condition and the impact of the proposed development could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF.

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."

In this case the proposals will result in a level of harm to the significance of the conservation area and neighbouring listed buildings via the incremental erosion of the character and appearance of the area from poorly designed development. As a result, from a built conservation perspective, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore object to the application.