

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/00028
Part demolition of existing buildings and erection of two self-build dwellings (use class C3) including parking, landscaping and associated works.
Land adjacent 36, Bath Road, Bradford on Avon, BA15 1SR

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 66 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 lies at the north edge of Bradford on Avon, close to the boundary of Bradford on Avon Conservation Area and adjacent to a Grade II Listed Building, 35 Bath Road.

Proposal: The proposal seeks part demolition of existing buildings and erection of two self-build dwellings (use class C3) including parking, landscaping and associated works.

Relevant planning history: 20/06975/FUL - Redevelopment of Land adjacent to 36 Bath Road to provide 4 x 2 Bedroom Residential Dwellings (withdrawn); 18/03381/PREAPP - Redevelopment to provide 5 dwellings.

Issues: 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, the application is accompanied by a "Heritage Assessment" 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.

In this case the significance of the site lies in its former agricultural origins and links to a surviving past and origins to the settlement including the presence of the surviving farm buildings. Barn A (open cart shed) in particular makes a contribution to the setting of the heritage assets.

Assessment: This is my second response and follows on from the submission of amended plans.

The site lies at the north edge of Bradford on Avon, close to the boundary of Bradford on Avon Conservation Area and adjacent to a Grade II Listed Building, 35 Bath Road.

It was mainly used as agricultural land since the 1840's, with some of the older stone buildings dating from the late 19th century.

This site contains three historic buildings that are considered to be non-designated heritage assets. The extant buildings on the site are in a poor state of repair and are currently in use as commercial garaging and storage.

It is now proposed to keep the long cart shed (Building A) to its original length and to maintain barn L and incorporate the structure into plot 2. These changes are considered of benefit to the proposal and help maintain the historic origins of the site and importance to the heritage assets.

I have three comments to make of the revised scheme:

- Building A is a NDHA – the strong preference is to maintain this as an open sided cart shed as this maintains the original appearance of the building. Enclosing the building with door would radically alter the appearance of the building, In addition, having doors in such close proximity to each other will clash and cause operational difficulties swinging open.
- Building L is a NDHA and incorporating part of this into the property will cause pressure to convert the remainder of the structure to residential use in the future. The preference would be to maintain this as traditional agricultural cart shed (a storage structure) for the residential use.
- Boundary treatment - A number of the boundaries are existing stone walls. In a number of cases it is proposed to incorporate fences on top of the stone walls up to a height of 1.8m. The strong preference is to increase the height of the stone wall, as timber fences are suburban in appearance. In addition a number of visually exposed boundary treatments are proposed as timber 1.8m fences, e.g. as seen from Ashley Road – this would not be supported due to the visually prominent natures of the stone. Native hedges with post and rail would be more suitable softer boundary.

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 proposed amendments are requested to Building A, L and boundary treatments.