

Wiltshire Council Planning Consultation Response

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and Central)

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Application Nos: PL/2026/01841 and PL/2026/02025

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

Scope of comments: the following comments relate to the built historic environment.

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.

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. Section 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. The NPPF 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." It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

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.

The NPPF 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 information does not include a “Design, Access and Heritage Statement” 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, the NPPF also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

In this case the significance of the building 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 and which contribute to the character of the Area.

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.

In this case we have been provided with degree of justification for the proposed works and analysis of the features that comprise the significance of the Heritage Asset.

The proposals could result in harm to the building via the loss of historic fabric and character and via change to its layout and original external form. The proposals involve only parts of the building and could therefore be considered as causing ‘less than substantial harm’ for the purposes of interpreting the NPPF, but they involve the impact on features which may be seen as being of lesser consequence. Indeed, the wording of the NPPF and the ‘special regard’ by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

At this stage we advise that following our site visit that information presented is considered proportionate to the scale of the proposals as submitted and that a wider application will follow that will include a broader spectrum of works that will require further analysis and assessment at the

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, having met the applicants and listened to their plans for the use of the site it is clear in this case wider public benefits are associated with the proposed use that are not documented within the current applications.

The area proposed for removal are modern fabric of a poor quality design and materials. The removal of this fabric will better reveal the form of the original building and thus enhance significance of the building.

The applicant has amended the design of the scheme to allow the replacement of internal flooring where modern timbers were laid on earth, the proposed replacement a stone floor is considered to preserve the significance of building given the modern nature of timber boards traditional format of the new stone.

Additional information has been provided to detail the proposed construction of the stone flooring and detail the format of the proposed new glazing, both are considered appropriate.

