

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/04261
Demolition of existing commercial unit and construction of 4no. 2 bedroom houses and associated works
51 Haynes Road, Westbury, BA13 3HD

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. 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 214-16 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 England's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment". Additional guidance is also contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)

The following points are taken from the Historic England document “The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

“The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset.”

“The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part...”

“While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time.”

“The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Other HE publications

HE GPAs and HEANs [The Planning System | Historic England](#)

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.” 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.”

Proposal: The proposed scheme looks to demolish the existing single-storey commercial unit with associated outbuildings and construct 4no. 2-bedroom houses, together with the associated landscaping works.

Relevant planning history:

W/76/00986/HIS - Rebuild existing store to provide new showroom and workshop

W/90/01048/FUL - Two bedroomed flat at first floor level incorporated with new showroom

W/85/01191/FUL - Rebuilding of existing shop and workshop

Issues: impact on the setting of neighbouring listed buildings (50 Edward Street & 12 Warminster Road), 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 applications are 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 (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.

The existing site is a single-storey building, that now presents a shop front to part of the front elevation, with its own yard and associated outbuildings to the rear. The existing site plan shows the red line includes the side access which extends to the rear of 12 Warminster Road (Grade II listed building).

The site has a render finish, but the undulating roof indicates that the building fabric maybe of some age, despite the number of planning applications and the UPVc shop front and windows. However, the building has undergone several changes and alterations, and it is unlikely that much historic fabric remains.

Reviewing the historic maps, the site appears to be an early commercial/ industrial building which reflects on the importance of trade and industry to Westbury. It is unclear from the OS maps if this was connected to the Glove making or cloth trades, or any other industry. The building is at the end of the terrace of houses with what was the Cottage Hospital (Prideaux Voluntary Hospital). The terraced housing and the site sit on the boundary edge, with the terraces stepping up in pairs, following the gentle climb of the hill, with a central chimney stack per pair of dwellings, with 3 pots per house. The terraces and the former Hospital building (Westbourne Road, formerly Hospital Road) form the end of the conservation area boundary, and this reflects the historic development pattern on the 2nd Ed. OS map.

The Westbury Conservation Area Appraisal and Management Plan (October 2020 - Consultation) provides a summary of significance. The document highlights:

The predominant material is red brick, (in mostly Flemish bond and some English bond, particularly Industrial buildings). Stone is seen predominantly as an accompaniment to brick, for dressings to windows, doors as well as door hoods, string courses, pilasters, cornices, parapets, quoins, gate piers and copings to walls and boundary walls. Clay tile is the predominant roof material. There is a mix of pantile, plain tile, early 20th century interlocking tiles (in single and double Roman patterns) and some natural slate.

Assessment: The proposed scheme looks to demolish the existing group of buildings and construct 4No. 2-bedroom dwellings in brick, using a contemporary design based on the adjoining terraces. The scale is slightly larger due to the current legislation that prescribes room sizes and construction details. This means that the ridge will be set back from the existing ridges, as shown in the proposed Block Plan (A17 26 09 P01), but not shown in the proposed street view plan. Whilst minimal, this will have a visual impact when approaching from the north into the conservation area. The simplicity of the stepping and the position of the ridge line form part of the cohesive appearance of this side of the street. These simple steps in the ridge

line are a positive, yet subtle feature of the street scene, and contrast to the buildings on the opposite side of the road. There is a concern that the offset ridge position will create a strange effect on the street scene. It is recommended that this view is shown on proposed drawings, or consideration for changing the ridge position is undertaken, or a change of building line (such as responding to the former hospital building).

The proposed design responds to the formation and repetition of the adjoining terraces, with details of brick soldier courses above openings, and under eaves. The proposed eaves detail of the projecting snapped headers helps create some shadow and contrast. To create some visual interest, a 'ladder' of projecting bricks to alternate courses is proposed adjacent to the first-floor window. Whilst the existing terrace has limited architectural details, there is visual interest to the front elevations with the use of the English Garden Bond and arched window openings. There would have been additional detail with the stone windowsills that have generally been lost with the installation of the UPVC windows. The creation of the 'ladder' effect to the side of the first-floor window with the brick work, and the soldier course is not considered sufficient to create visual interest within the street scene.

The proposed windows respond to the design of full height or more linear form but are truncated with the inset panels. This increases the verticality of the design and makes them contrast with the historic terraces. Whilst a contemporary interpretation is supported, it needs to be balanced to either protect or enhance the historic environment. The uniformity of the colour palette and details contrasts with the small differences formed within the terrace, which create individuality and add to the character, and therefore interest of the buildings. Whilst the UPVC doors and windows may not be a positive contribution to the character of the conservation area, their individual nature is. The proposed design could consider the choice of colour and material for the infill panels if a more vertical design is proposed, such as the use of a stone-coloured render panels, or sill details. The quality and choice of bricks and the bond will be important to the success of the design.

The SW gable end is not shown on any of the proposed drawings, which has already identified to have the potential to contribute or harm the character of the conservation area. The SE gable is shown on the proposed plan with a simple staircase window. Again, this offers a vertical window with an infill panel. The same consideration on materials and details as the front elevation is raised.

The proposed boundary treatment to the rear is not detailed, but the proposed elevation plan indicate that this could be 1.8m close boarded fencing. This is considered unsuitable for the conservation area where boundary walls are traditionally brick or render. As the side boundary wall visible from the public realm, it is recommended that this should be brick or render. Any other boundary wall which can be seen from the public realm should also be brick or render.

Aspects such as car parking/ EV charging points, are considered as part of the planning balance exercise, and not a heritage consideration.

The principle of the demolition of the existing building and the proposed construction of the new dwellings is considered acceptable. There is some concern over the proposed design of the new houses and how these would integrate into the street scene and the character of the conservation area.

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.

The proposals will result in harm to the character of the conservation area by proposing new development that is considered not to contribute to the character of the conservation area. The proposals could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the impact on the character of the conservation area and should not be seen as being of lesser

consequence. Indeed, the wording of the NPPF and the 'special regard' by Section 72 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, the harm identified could be removed by an amendment to the proposed design.