10th February 2016

Charmian Burkey
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Our Ref: 416.00404.00048
Your Ref: Application No. 14/12118/OUT Land at Rowden Park

Dear Mrs Burkey

RE: APPLICATION NO. 14/12118/OUT LAND AT ROWDEN PARK – ARCHAEOLOGY AND CULTURAL HERITAGE

This letter is in response to the English Heritage (now Historic England) correspondence dated 29th January 2015. It seeks to address some the identified issues identified in connection with the Cultural Heritage Environmental Statement chapter (SLR 2014) and is complimented by an addendum to the ES to assess the Rowden Park Conservation Area (SLR 2016). It also addresses objections raised by a letter from CSJ planning dated 24th November 2015. The current ES, along with the addendum ES for the Rowden Park Conservation Area, will provide sufficient information to allow determination of the planning application.

In their consultation letter, English Heritage raises no objections in principle to the development. They also defer further comments to the Council's own Conservation Officer in determining the application.

The Environmental Statement (ES), Archaeology and Cultural Heritage Chapters conform to the NPPF and current Historic England guidance. The ES chapter assesses the heritage significance including contribution of setting, and the impacts on those settings, in paras 6.8.1 - 6.8.12. The magnitude of change and impacts of the proposals on designated and non-designated heritage assets and archaeological sites and the significance of effect are then assessed in 6.8.13 – 6.8.16.

The ES presents a robust assessment in line with planning policy and guidance from Historic England. Table 6.1.5 in appendix CH-1 of the ES, presents the methodology and outlines how the level of harm has been weighed for each asset. The impact assessment clearly explains and defines setting, before assessing impacts on the setting of listed buildings and the conservation area. Indeed the consultation response from English Heritage in January 2015 has established the following:

"We have inspected the Conservation Area and do not consider that there will be any direct adverse impact on the settings to the designated heritage assets within the central core around Rowden Manor. Indeed, we are pleased to see that the development does not intrude into the CA itself and that this land will be retained as a Country Park. The main
impact of this scheme will be on the setting to the conservation area itself and to the rural landscape that dominates this entrance into the town.

While the LPA has a duty to apply the statutory tests of S66 and S72 to Listed Buildings and Conservation Areas, it overall has to make decision based on public benefit of the scheme weighed against the degree of harm. In this context sections 6.8 and 6.9 of the ES chapter are correct in presenting the assessment of potential harm prior to mitigation, and of what the effect would be after mitigation, presented in EIA terminology. This is clarified in table 6.1.5 of appendix CH-1.

In the ES chapter section on legislation there is specific reference to the 1990 Act (6.12) which explicitly flags up the obligation of the SoS and LPA to preserve the settings of LBs, and in 6.1.13 the same is done for Conservation Areas. This is repeated in the Impact Assessment (6.8.11) where it is stated that it is the statutory duty of the LPA to have special regard to the desirability of preserving the setting of a listed building. This section then goes on to apply NPPF and our methodology to explicitly assess the impact on the heritage significance of the Designated Heritage Assets. Therefore the chapter has advised the LPA appropriately of their statutory duties. It has made this explicit in two separate parts (6. 1.12 – 6.1.13, and 6.8.1).

English Heritage (Historic England) has raised the following concern that Historic Landscape Characterisation (HLC) data has not been used;

It would be helpful to have clear evidence to show how the development proposals have been informed through the use of the Historic Landscape Characterisation that is on the Local Historic Environment Record. The current setting to the CA is going to be markedly altered by the presence of this development so we need to be clear that the setting to the conservation area has been fully considered and the appropriate level of mitigation provided.

To develop this further the accompanying Heritage Statement, takes consideration of the historic landscape when considering the setting of the conservation area. This has been fed into the assessment of historic setting. However, the Historic Landscape Characterisation data for Wiltshire is not as yet available as that project has not reached its conclusion. This will be available later in 2016. Consultation with the county archaeologist has ascertained that the most of the area of the proposed development is broadly classified as fields and enclosed land and the area around Rowden Manor as rural settlement and country manor. It is understood that due to the way that the Historic Landscape Characterisation has been undertaken means that the parkland area at Rowden is too small to have been classified as such. However further details are not available, and this is not the final dataset and subject to revision.

The proposals have been landscape led, and the assessment was carried out in open consultation with local authority officers. In addition the landscape and visual assessment submitted with the application provided a comprehensive assessment of the historic landscape character of the battlefield, all of which was sufficient to show that no significant harm would be caused, and what benefit would be provided. This is in contrast to the above comment which considers a markedly different setting, on which no evidence is provided.

English Heritage (Historic England) have requested more work on the setting of the Conservation Area, principally due to the age of the Conservation Area Statement. They state:

The Conservation Area Statement provides a good insight into the significance of the CA; however, it does not appear to have made any assessment of the setting to the CA. This is likely to be due to the age of the document – published sometime before the English
Heritage Guidance on CA Character Appraisals. We, therefore, wish to see a Heritage Statement for the development to address this matter in line with Paragraph 128 of the NPPF.

In response to this consultation the setting of the conservation area is considered in detail within the accompanying addendum to the ES and we believe that this provides a greater understanding of the potential for impacts to the setting of the Conservation Area. When considered alongside the mitigation proposed in 6.9 of the ES it is believed that the impacts will continue to result in “moderate-substantial enhancement” to the setting of the conservation area.

The ES puts significant weight on preservation and enhancement of both the Conservation Area, and the enhancement to the setting of Listed Buildings within the Rowden Park complex. This has been achieved through proposed retention, repair and preservation of historic field boundaries and screening of the proposed development through sympathetic planting. This is outlined in section 6.9 where the mitigation measures and public enhancement which would “compensate” for the low level of indirect harm to designated heritage assets are outlined.

In this way the proposal goes much further than only preservation through record or information panels, but both preserves and opens up a large section of historic landscape, retaining significant views and reinforcing existing historic hedgerows as screening of the new development. This makes a positive contribution to the setting of the listed buildings and as such does satisfy the legal tests of S66 nor S72 of the Planning (Listed Building and Conservation Areas) Act 1990. In these ways the application has given ‘considerable importance and weight’ to listed buildings, the conservation area and their setting.

English Heritage (Historic England) states their opinion that:

In general, we believe that more efforts should be made to protect the setting of the CA by introducing more planting where appropriate and where this is not suitable allowing a larger buffer of land between the development and the CA.

The most southerly part of the new scheme will be particularly conspicuous in the wider landscape. From the B road coming south towards Chippenham, there are various views across the landscape towards the CA. This land is also publically accessed from a number of footpaths that transgress this landscape, many parallel with the river. The fields that have been allocated for this development are important as they all contribute towards the setting of the CA. In this area, we wish to see a reduction in housing densities and/or more green space softening the edges of the development and providing a less formal layout to the housing to better reflect the rural character of its context. Consequently, the Masterplan needs to demonstrate how the development will merge into the landscape more naturally with a less artificial edge and reduce the predominantly formal layout of the streets and housing in this part of the scheme, thus making more effort to maintain the rural setting to the southern end of the CA.

No changes are proposed to the design because the scheme preserves and enhances the setting of the conservation area, as well as open up access within it. This allows a greater appreciation of a piece of historic landscape around Chippenham.

The area that is highlighted in the English Heritage letter, the southern area of the scheme, is presented in a strong landscape framework of trees and semi-detached houses, with large gardens. The aim of these outline proposals is to retain the woodland, supplement this with
new planting and create a 20 – 30 m landscape strip, in order to screen the development and preserve the character of the conservation area and its setting.

The housing in this southern area is the least dense of the whole development. Substantial areas of open space 60 – 90 m wide within the south eastern corner, along with informal native tree and shrub planting typical of the local character, improve the screening. The flat low lying nature of the southern area of the proposed development, along with the cumulative effect of intervening vegetation, helps to filter views and to ensure that the setting of the conservation area is further preserved. As a result it is not thought that additional planting or reduction in housing density is required, however as the masterplan is outline, there is further scope for revision at the detailed master planning stage. These could include greater density of tree screening, with higher trees if required and the extent of this can be established through consultation with Historic England.

The whole design has been landscape led, with direct input from landscape character and visual assessment of the area. This has considered the sensitivity and setting of the conservation area and sought to preserve the green finger of land that follows the River Avon into the centre of Chippenham. This is highlighted as an area of significance in the Conservation Area Description prepared by Wiltshire County council’s Design and Estates Team in October 2005;

“The Conservation Area of Rowden exhibits the unusual combination of an intensely rural and agricultural domain surrounded by the peripheral development of a large town. The topography of the area seems to make Rowden Farm, as the historic focus of the Conservation Area, both visible and vulnerable from development into the general field of view. By virtue of its protected river valley nature, it is one of the two green fingers of countryside that follow the line of the river Avon right into the centre of Chippenham.”

As such it is considered that the application will preserve this character, while providing access and preserving historic features. Rowden Farm will remain the focus of the area and will remain prominent. The development will be screened and key historic views maintained along the river valley. In these ways the proposals have given ‘considerable importance and weight’ to listed buildings, the conservation area and their setting and will provide mitigation resulting in the enhancement of the historic environment.

Yours sincerely

SLR Consulting Limited

[Signature]

Andre w Burn
Associate Archaeologist