Dear Mrs Burkey

ROWDEN PARK, PATTERDOWN ROAD, CHIPPENHAM, WILTSHIRE
Application No 14/12118/OUT

We have received amended proposals for the above scheme. We do not wish to comment in detail, but offer the following general observations.

Historic England Advice
We previously provided comments on this application on 29 January 2015. In our letter we identified Rowden Park as a unique area of land to the south of Chippenham and consequently appropriately designated as a Conservation Area (CA). At the centre of Rowden Park CA is the Rowden Manor complex formed from a series of designated assets and a separately scheduled moated site, set within a rural context. Much of this part of the CA reads as common/pastoral land formed on the edge of the suburban fringes of Chippenham.

This proposal is for a large primarily residential development of approx. 1,000 houses and a school to the west of the boundary to the CA on agricultural land between the B4528 and the western side of the CA. In our original response we were concerned about a number of issues about this proposal- not least was the absence in the heritage statement regarding the impact of this scheme on the Conservation Area and its setting. We have already stated that the Scheduled monument and grade II* listed buildings formed around Rowden Farm will not be directly impacted on by this development. Although our particular remit precludes us from commenting on grade II assets, we are interested in the impact on the Conservation Area and its setting.

In order that these works adhere to the requirements of the Planning (Listed Building and Conservation Areas) Act 1990, section 72, which states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area” we would suggest that alterations to this scheme are required, as in our opinion the current scheme fails to preserve or enhance the Conservation Area.
The National Planning Policy Framework (NPPF), paragraph 137, requires the “Local Planning Authority should look for opportunities for new development within Conservation Areas… and within the setting of heritage assets to enhance or better reveal their significance.” Due to the irreplaceable nature of the rural backdrop to the Conservation Area ‘any harm or loss should require clear and convincing justification’ as specified in paragraph 132. In addition paragraph 138 states that “Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area… should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134.” Paragraph 134 of the NPPF states that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.’

The recent report entitled “Environmental Statement Addendum” has been prepared in response to our earlier letter. We are pleased that an assessment has now been made focussing on the impact on the Conservation Area and its attributes. However, we are unable to concur with this reports findings. In particular, we believe that the area of rural open fields that is a significant characteristic of the southern aspect of the Conservation Area also extends around the south-western and part of the western side of the Conservation Area’s boundary. This rural quality is an important and positive element of the conservation area’s character and contributes towards the way it is experienced in this location. Furthermore, the report recognises that the construction of housing along the western and south-western margin of the Conservation Area will have a “significant indirect affect” on it. However, we disagree with the concluding remark that the development along the western margin will result in a “neutral significance of effect.” In our view the proposal will have a marked impact on this aspect of the Conservation Area’s character and immediate setting and the application should therefore be judged against Paragraph 134 of the National Planning Policy Framework.

It is also disappointing that the applicants do not consider it necessary to revisit their original Masterplan despite the point raised in paragraph 2.6.5. of the report that the construction of residential housing “would change the existing predominantly rural character”. As already stated as we consider this to be a fundamental component of the Conservation Area’s context, we would have expected more consideration of the mitigation measures and landscaping to be reviewed. The tranquillity and sense of spatial distance from development that is currently experienced within the Conservation Area will, in our view, be harmed by the presence of this development in close proximity to its boundary. As a result we suggest that the layouts, densities and landscaping are reviewed in order to reduce the impact of this development on the Conservation Area and its immediate environment.

We have also been copied into a report by Stephen Bond that has been undertaken to assess the impact on the Historic Environment by the two separate development
proposals in this part of the landscape. Whilst we are mindful of the concern voiced over the lack of evidence base for Chippenham’s housing allocation policy, we also understand that this issue is currently being reviewed and that recommendations have been put forward by Historic England to safeguard Chippenham’s historic environment. On this basis, we consider that the determination of this application, subject to ensuring that S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 are met, is a matter that rests with the Local Planning Authority to resolve.

**Recommendation**

We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.

Yours sincerely

[Signature]

**Caroline Power**

Inspector of Historic Buildings and Areas

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cc Caroline Ridgewell - Conservation Officer