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**From:** Brown, Russell  
**Sent:** 12 February 2018 17:39  
**To:** Perks, Matthew  
**Subject:** Conservation comments for 17/12491/FUL

Dear Mathew,

Policy and guidance:

Above the various tiers of planning policy and guidance is the over-arching statutory requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the “desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (s66).

In addition Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

Paragraph 128 of NPPF requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 132 of the NPPF states 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. ... Significance can be harmed or lost through ... development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”

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, this harm should be weighed against the public benefits of the proposal...”

The Historic England document “The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 (2<sup>nd</sup> edition)” (HE GPA3) states that: “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...” and “The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Core Policy 57 of the Wiltshire Core Strategy states: “A high standard of design is required in all new developments, including extensions... Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through... being sympathetic to and conserving historic buildings”

Core Policy 58 of the Wiltshire Core Strategy echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of heritage assets.

Consideration:

This site is within the Conservation Area and within the settings of several Grade II and Grade I listed buildings and structures. In terms of the street scene the majority of the buildings, and indeed those most prominent, are historic and often dating back to the 14<sup>th</sup>, 15<sup>th</sup> and 16<sup>th</sup> Centuries. This is a very special area in terms of historic interest and sensitivity.

When stood on the road or opposite pavement outside of the application site, one can look south east down the road and see the Church Farmhouse which although unlisted is an historic building and therefore a non-designated heritage asset. Beyond that the more modern Primary School is mostly recessed from view in favour of the Grade I listed Talboys, which can be clearly seen. On the north side of the road runs the Grade I listed (separately listed, not simply a curtilage structure) boundary wall to the Manor. This Grade I wall terminates opposite the application site. To the north west the road is immediately flanked by pairs of Grade II listed historic cottages which would be seen quite clearly in the setting of the proposed buildings.

The quotations above from the HE GPA3 are particularly relevant here. The settings of these listed buildings are enhanced in their significance by their historic surroundings. The street scene is a succession of historic buildings and walling which reinforces the setting of each one. The modern buildings, mainly the Primary School on this stretch of road, are exceptions which should not be repeated without clear and convincing justification due to the harm to, and dilution of, that historic character and setting.

As this site is within the setting of several listed buildings and structures, including the separately listed Grade I boundary wall to the Grade I listed Manor, it would be expected that to be in accordance with paragraph 128 of the NPPF that a detailed Heritage Statement would be included in the submission. There are a few notes of listed buildings and the Conservation Area in the submitted statement, but no analysis is put forward as to why these proposed buildings would not be harmful in this historically very sensitive location.

It is considered that the statement included in the submission does not meet the requirement of paragraph 128 of the NPPF in that the level of detail is not proportionate to the significance of the heritage assets affected. The level of detail needs to be much greater in depth and analysis to satisfy the NPPF requirement. Consequently, I find that the application should be refused in part for a lack of information contrary to the provisions of paragraph 128 of the NPPF.

I note that no pre-application enquiry was entered into for this application; this type of information would have been brought out in such a process. A Heritage Statement should have been completed really as the first piece of work, and then that document used to inform the proposals. Unfortunately we are now in a position where the scheme is before us and it appears that the impact on heritage assets has been only lightly considered.

As stated above the street has many pairs of historic cottages and the application seeks a pair of houses connected by garages or car ports. However, the proposed pair are entirely modern in appearance. The use of traditional materials is noted, but to use traditional materials on an otherwise modern set of buildings would not be enough to let them blend in to this historically sensitive area. Nor does setting them back into the site reduce their impact to the immediate area; the Grade I listed stone wall is directly opposite as well as the Grade II listed cottages situated immediately to the north west.

The modern design is entirely standard and at odds with this historic area, rather than being, for example, an innovative modern approach that addresses the historic setting with a form of juxtaposition. I am not saying that a juxtaposition is the correct approach here, but that the current scheme achieves neither a juxtaposed statement nor a traditional one.

Consequently, the proposed scheme would result in less than substantial harm, considered to be at the upper end of the scale, to the character of the Conservation Area and the settings of the surrounding Grade I and Grade II listed buildings by reason of the incongruous and alien design, scale and siting of the proposed dwellings contrary to Policies CP57 and CP58 of the Wiltshire Core Strategy and Section 12 of the NPPF. In applying paragraph 134 of the NPPF I can find no public benefit from a conservation perspective to outweigh that harm. The application should also be refused for a reason of lack of information in not meeting the requirements of paragraph 128 of the NPPF.

Kind regards  
Russell

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