

16 Polebarn Road
Trowbridge
BA14 7EG
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Mike Wilmott, Head of Development and Matthew Perks, Case Officer
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Wiltshire Council

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Dear Mr Wilmott and Mr Perks

Comments on application 18/04656/FUL and 18/05278/LBC

I live in Polebarn Road. My house adjoins the proposed development site. I am writing in response to your letter 4 June 2018 and to object to the proposed development.

The development includes the conversion of Courtfield House a Grade II* listed building and other associated buildings into residential accommodation and building further residential accommodation in the orchard that Courtfield House is set within.

Courtfield House is set with a conservation area. I am aware Courtfield House is in a serious state of disrepair. This is the result of inadequate maintenance over an extended period. Recent thefts of lead from the roof and vandalism to the house have occurred during the ownership of the land by the applicants.

I do not object to the proposed development of Courtfield House as this is necessary to preserve the structure. My main objection to the proposed development is the proposed development of the orchard. The proposed development is disproportionate and will have an adverse effect on the locality. Destruction of the orchard at Courtfield House will involve detriment to the listed building and permanent loss of a valuable local amenity adjoining Trowbridge Park that could and should be preserved for the benefit of the community.

For convenience and clarity I will set out my objections under separate headings.

Development Plan Policy

Core Policy 29 Trowbridge Community Area Strategy (Development Plan paragraph 5.150) indicates the importance of maintaining and enhancing existing heritage assets and green infrastructure in all new developments:

- Trowbridge has a strong industrial heritage and features a number of key landmark buildings, including the Town Hall, mill buildings and a hierarchy of buildings associated with the cloth industry. Future development should have regard to this important heritage and ensure proposals enhance, rather than negatively impact on, the existing townscape

- all development in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding

Core Policy 50 Biodiversity - requires development proposals to demonstrate how they protect features of nature conservation:

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term

Core Policy 51 Landscape - requires that development should protect conserve and where possible enhance landscape character:

Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures

Core Policy 50 Landscape - sets out specific elements of landscape that should be considered. Many of these are directly relevant to the Courtfield House site in a conservation area adjoining Trowbridge Park:

- ii. The locally distinctive character of settlements and their landscape settings.
[. . . .]
- v. Landscape features of cultural, historic and heritage value.
- vi. Important views and visual amenity.
- vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion.
- viii. Landscape functions including places to live, work, relax and recreate.

Core Policy 52 Green Infrastructure – requires that development should make provision for the retention and enhancement of Wiltshire’s green infrastructure network. The orchard on Courtfield site adjoining Trowbridge Park is part of that network:

Development shall make provision for the retention and enhancement of Wiltshire’s green infrastructure network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to:

- i. retain and enhance existing on site green infrastructure
- ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards
- iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development

Core Policy 58 Ensuring the conservation of the historic environment – is cross-referenced in **Core Policy 57** - Ensuring high quality design and place shaping. **Core Policy 58** underlines the links between heritage assets and their environment:

Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

[. . . .]

iii. buildings and structures of special architectural or historic interest

iv. the special character or appearance of conservation areas

[. . . .]

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 potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with **Core Policy 57** (Ensuring High Quality Design and Place Shaping)

The proposed development plan aims to utilise the development potential of the orchard to cross-subsidise the renovation of Courtfield House. No specific figures are provided in the development proposal. However, the development proposal for the orchard misrepresents the contribution of the orchard to the listed heritage asset. This approach is contrary to the Core Policy Framework. It is also contrary to the view of Historic England who have indicated that a development proposal to preserve a heritage asset without regard to its environment is misconceived as the loss of environment may significantly diminish the listed asset.

The proposed development treats the orchard as a disposable asset for cross-subsidy. Applying the Core Policy statements in the Development Plan this approach is mistaken. The orchard has never previously been developed. It has been recorded as a green space for over two centuries and contains an orchard that is over 150 years old. In this context the orchard should not be considered the same as the other built areas of the Courtfield House site. It is really a greenfield site and its unique contribution to the heritage asset is that it remains undeveloped.

To conform with the Development Plan Core Policies the development proposal should focus on sensitive development of the existing built upon areas of the site. This should be the starting point for cross-subsidy. Only when the revenue potential of this level of development has been established should consideration be given to any incursion into the orchard and each incursion should be balanced with the cost in terms of loss of community amenity and the impact on the listed asset in accordance with the Core Policy framework in

the Development Plan. These considerations would also need to include the other relevant issues as set out in your letter.

Government Guidance

National Planning Policy Guidance (“NPPG”) sets the framework for local development policies.¹ There is particular emphasis at paragraph 7 on the need for development to be sustainable:

There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

[. . .]

At paragraph 8 the NPPG describes the approach to achieve sustainable development:

. . . to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions

At paragraph 9 the NPPG gives further guidance on what is meant by the pursuit of sustainable development:

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life . . .

The NPPG requires all planning decisions are made in accordance with the development plan and a presumption in favour of sustainable development.

At paragraph 128 the NPPG sets out the approach that should be taken by a planning authority when considering a planning application that includes heritage assets (emphasis added):

In determining applications, local planning authorities should require an applicant 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological

¹ <https://www.gov.uk/government/collections/planning-practice-guidance> (published 29-11-16 - checked 01-07-18)

interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Highway safety and traffic

The proposed development will impact on the volume of traffic using Polebarn Road. Polebarn Road is a no through road and the only means of vehicular access to the proposed development will be along Polebarn Road. At this point Polebarn Road has a high number of vehicle movements for access to Roundstone Surgery, Roundstone Nursery and the Magnet store in addition to being used as a parking area for visitors accessing the town centre and Trowbridge Park. These vehicle movements already significantly impact on residents of Polebarn Road and West Ashton Street.

There are other proposed developments on sites off Polebarn Road that will also add to the volume of traffic. The description of car use in the proposed development plan is based on an outdated traffic survey and does not fully consider the impact of the development on Polebarn Road that has parking allowed on one side and when cars are parked is only passable in one direction.

The access route to the proposed development utilises an access route to Trowbridge Park used by children pedestrians and cyclists on their way to and from schools situated to the west of Trowbridge. The arrangements for vehicular access to the site will involve a dangerous mix of pedestrians and cyclists crossing the road into the development and a further mix with vehicular access to Roundstone Surgery car park and the proposed development at Court Mills.

The additional volume of traffic when combines with existing usage will create additional dangers and these issues cannot be resolved due to the specific constraints of the Courtfield House site. These significant issues can only be addressed by significantly reducing the size of the development and the parking requirements.

Design, appearance and layout

The design and appearance of the development is compromised by the detrimental impact of the loss of the orchard on the listed building. Notwithstanding my comments on the number of dwellings that should be reduced, the design could be improved by limiting development to the existing built areas of the site and utilising the existing car parking space that has been identified as a residential unit on the plan.

Using this space would have two significant advantages to the proposed development: (a) it would minimise vehicular access and interference with the pedestrian pathway into Trowbridge Park; and (b) it would minimise the visual interference to the view of Courtfield House from the east (along West Ashton Street). Of the houses proposed in the orchard the residential units situated in the centre of the orchard present the greatest detrimental impact on the listed building.

Conservation of buildings, trees and open land

As indicated above, the proposed development of Courtfield House would conserve the listed building, although private residential development would mean limited access.

However if the orchard were converted into residential units the loss of the orchard would cause significant detriment to Courtfield House as the listed building relies on its setting.

The orchard has never been previously built upon. It is a greenfield site. It contains mixed fruit trees over 100 years old and provides a rich natural habitat for birds, insects and various mammals including bats, badgers and foxes. The value of the Courtfield House site relies in part on its proximity to Trowbridge Park. The loss of the orchard along the edge of the park would have a detrimental impact on the park.

The park is currently well used by the community and will have greater use as the population of the town increases. At present the park has mixed uses including multi-sport courts and a bowling green. To continue to serve the centre of Trowbridge the park should be extended if possible, adding extra spaces for different community uses. At this point the park lacks informal space. An attempt has been made to provide this space in the pathway down to the Biss where there are fruit trees planted. However this space is limited and the trees are still quite young. If the orchard were retained and added to the park there would be significant interest from community and wildlife groups able to utilise the space for community use. Access to the park could be facilitated by a gated entrance at the rear of the bowling green.

At this point the park is overlooked by the alms-houses and flats at Raleigh Court along Polebarn Road. Recent developments along the top of the park at St George's works and Pitman Court have led to trees being cut down and the resulting development will add pressure to that side of the park. The park is also significantly overlooked from the west by the multi-storey car park. If the orchard were retained the pressure on the park from the eastern boundary would be significantly relieved.

I hope that you will consider these comments in relation to the proposed development. I understand from your letter 4 June 2018 that a decision is expected to be made by 16 August. I look forward to hearing from you with information when the application will be considered by Wiltshire Council's Development Control Committee as I would like if possible to address the Committee.