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Subject: Courtfield House, Polebarn Road, Trowbridge, Wiltshire: 18/04656/FUL and 18/05287/LBC
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Attachments: [image001.png](#)

Courtfield House, Trowbridge, Wiltshire:

The above application has been brought to the attention of The Georgian Group. The lack of consultation for a scheme as large as this, relating to such a significant Georgian building is both alarming and concerning. We remind the local authority that they are obliged by statute to consult Amenity Societies and Historic England on Listed Building Consent Applications as laid out under the Arrangements for Handling Heritage Applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015.

Notification to Historic England and National Amenity Societies 4. Notice of applications for listed building consent and of the decisions taken by local planning authorities on those applications must be given:

(a) to Historic England in the following cases:

- (i) for works in respect of any grade I or II* listed building; and
- (ii) for relevant works in respect of any grade II (unstarred) listed building;

and (b) to-

- (i) the Society for the Protection of Ancient Buildings,
- (ii) the Ancient Monuments Society,
- (iii) the Council for British Archaeology,
- (iv) the Georgian Group,
- (v) the Victorian Society, and
- (vi) the Twentieth Century Society, in the following cases:
 - (aa) for works for the demolition of a listed building; or
 - (bb) for works for the alteration of a listed building which comprise or include the demolition of any part of that building.

The application in question clearly falls under ‘works for the alteration of a listed building which comprise or include the demolition of any part of that building’.

Courtfield House is a Grade II* house of c.1762 by John Cockes, a clothier. It is of two storeys with attics and cellars, built of brick on a projecting plinth with moulded stone capping and chamfered stone quoins. To the rear are workshops, including the separately listed Workshop (Grade II) of 1773. The building was later amended in the nineteenth century and was remodelled extensively between c.1860 and 1887. To the rear is an orchard dating from the latter half of the nineteenth century. The Garden Wall and Gate Piers are both separately listed as Grade II.

The application seeks to subdivide Courtfield House into five dwellings, and the erection of 16 dwellings in the rear orchard, the conversion and alteration of the Wool Store Building and comprehensive landscaping.

The Georgian Group has no objections to the subdivision of the main house into five dwellings. From the initial plans it appears to be handled with relative sensitivity. We do, however, have strong objections to the development in the grounds. Historic England’s advice note on enabling development: ‘Enabling Development and the Conservation of Significant Places’ states that enabling development should be unacceptable unless ‘it will not materially harm the heritage values of the place or its setting’. We believe that the construction of 16 dwellings will significantly harm not only the setting of the Grade II* house but will also materially damage the Conservation Area. The applicant has failed to

produce a viability study or a schedule of works which would go some way towards justifying the harm to the heritage asset. The application also does not demonstrate that the amount of enabling development is the minimum necessary to secure the future of the place. There is also no evidence to suggest that the conversion of Courtfield House alone wouldn't be *financially viable*.

Paragraph 192 of the National Planning Policy Framework (NPPF) states that

'In determining applications, local planning authorities should take account of:

- a. The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b. The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c. The desirability of new development making a positive contribution to local character and distinctiveness.
- d.

The development of the orchard does not, in our opinion, make a positive contribution to local character and not only will cause major harm to the setting of the heritage assets within the proposed development site but also those listed buildings on Polebard Road.

In addition, we have concerns relating to access of the site. The demolition of the Wool Store and its replacement by a car park will also significantly impact the setting of the listed building. The proposed access to this car park does not seem to present any sort of public benefit, with the road being very narrow.

We do not believe that the application satisfies the NPPF, particularly paragraph 193, 194 and 195.

193. 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: 56 a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional⁶³.

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.

We are aware that the applicant is in the process of putting together a viability study and is in further conversation with both the Conservation Officer and Historic England. These are

our initial observations and we shall consider any further information presented to us. In the meantime, if your authority is minded to grant consent for the LBC application in its current form, in light of our objection you should treat this letter as a request to notify the Secretary of State of the LBC application in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

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