



HERITAGE CONSERVATION

RESPONSE TO DEVELOPMENT MANAGEMENT CONSULTATION REQUEST

2021/2928/FUL (amended plans) - Bell Hill Garage, Bell Hill, Norton St Philip BA2 7LT

No Objection or comments - NOOBJECT		
No Objection subject to conditions described below - CONDITION		
Object/Scope for revision. See full comments	✓	
Object/Recommend refusal. See full comments below - OBJECT		

Summary:

Object due to harm to the significance of the Grade II-listed Church of St Philip & St James and the Norton St Philip Conservation Area due to the impact on their settings.

Comments on amended plans

Introduction

Having read the Heritage Statement Addendum in conjunction with the revised application drawings, some of my original concerns have been reduced while others remain relevant.

There is no objection in principle to the redevelopment of the already developed brownfield part of the site occupied by Bell Hill Garage; however, there remains an in-principle objection to the development of Old Orchard. This view is consistent with the planning history of this site where schemes to develop only the Bell Hill Garage part of the site have been approved while development of Old Orchard has been refused.

The Heritage Statement (HS) provides an assessment of the significance of each of the designated heritage assets identified – which I am in broad agreement; however, there are some areas where my view differs in terms of the impact of the development on their settings.

Old Orchard

Impact on Listed Buildings

There is a duty under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant planning permission for development which affects a listed building or its setting to have **special regard** to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. *[emphasis added]*

It was considered that the originally-proposed scheme would cause less than substantial harm at the lower end of the scale to the significances of the Grade II listed buildings: The Old Hopyard and Manor Farm, due to impact on their settings.

The amended proposal reduces the number of dwellings and moves the development away from the northern and western boundaries of the site, leaving wider margins of green space, tree planting, etc. I am

content, therefore, that the impact on the settings of Manor Farmhouse and The Old Hopyard has been reduced such that the development would result in no substantive harm to these assets' significances.

The revised scheme does not, however, address my original finding of harm to The Church of St Philip & St James: The church is a key focal point in the village and denotes the original first settlement. Its immediate setting comprises its churchyard, historic school and the other buildings on Vicarage Lane, while its wider setting includes the development site as views of the church tower can be seen from the upper section of Chevers Lane and from within the site. These views of the church from the rural periphery of the village provide the first indication of a historic settlement, across an undeveloped green space, which links to the farmland and landscape to the north. The development would, in part, obscure these views, and in areas where the tower can still be discerned, it will be viewed in the context of a modern development in the foreground. This will have some negative impact on the wider setting of the church and, therefore, some harm will be caused to its significance which would be at the lower end of "less than substantial".

Impact on Norton St Philip Conservation Area

Old Orchard, identified as an *Area of Landscape Value in the Norton St Philip Conservation Area Appraisal*, and falling under Policy DP2 as an *Open Area of Local Significance*, is recognised as making an important contribution to the character and appearance of the conservation area and development here would fail to preserve those elements of the conservation area that make a positive contribution to its significance.

A conservation area is defined as being "*...an area of architectural or historic importance, the character or appearance of which it is desired to preserve or enhance*", and there is a duty under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that when considering whether to grant planning permission for development which affects a conservation area to pay **special attention** to the desirability of preserving or enhancing the character or appearance of that area. *[emphasis added]*

Old Orchard positively contributes to the rural charm of the lanes around the north and west boundaries of the site and the sense of tranquillity, distinct from the built-up areas of the conservation area, and provides a green link to the wider landscape to the north, setting the conservation area in its rural context. While views across the site from Chever's Lane and The Barton are limited due to the high boundary wall, even if not wholly visible from the lanes, any residential development on this site (now reduced in the revised scheme) would present an entirely different character in terms of the noise, smell, light, etc., forming a general residential hubbub, thereby not preserving the character of this part of the conservation area which would cause harm to its significance.

The Heritage Statement is in agreement with this finding of harm, concluding in 7.2.5:

"The Ringwall Lane Character Area will undergo change as a result of the proposals, with the partial infilling of the open space known as Great Orchard. It has been established that this change will cause some harm to the significance of the character area and thus to the broader conservation area and one which affects a sense of place (albeit peripherally) and the ability to understand or 'read' that locale. In the context and terminology of the NPPF (paras. 199 to 202) this harm is assessed as amounting to 'less than substantial'."

The Heritage Addendum hasn't retracted this original assessment in light of the amended plans and concludes that "*...the level of harm is considered to be less than substantial and on the very lower end of this scale.*"

In terms of the impact on the conservation area, I do not believe that the reduction in the number of dwellings is sufficient to remove, or even reduce, the finding of harm, as the objection here is the principle of developing the Old Orchard. It is the loss of the contribution this important green space makes to the rural character of this part of the conservation area which is fundamental. The important green spaces, as identified in the conservation area appraisal, make an important contribution to the understanding of the evolution of Norton St Philip, and the relationship between the historic core and the rural landscape to the north would be diluted.

Therefore, the level of harm to the significance of the Norton St Philip Conservation Area would remain at the mid level of less than substantial.

Bell Hill Garage

It is agreed that, other than a general impact on the wider settings of the listed buildings in the village as a whole, the key listed buildings whose settings could specifically be affected by the development of the Bell Hill Garage brownfield site are the pair of cottages adjacent to the west – Manor Farm Cottage and the smaller cottage attached to its right, now known as Red Hill Cottage. Their setting is predicated on their position on Bell Hill which is compromised by the commercial nature of the adjacent Garage site whose open aspect to the street is uncharacteristic in the conservation area, characterised by rows of attached properties set at the back of the pavement or with a shallow frontage.

The Bell Hill frontage is improved on the amended scheme, although I remain unconvinced over the intermediate piers between stretches of walling. It is positive that the infill railings have been replaced with stone walling, but a more vernacular approach should be employed here, taking its reference from the historic boundary walls in the vicinity. The piers should be removed, leaving a continuous simple stone wall either side of the vehicular access (where simple piers could be employed either side), and capped with either cock & hen or a simple lime mortar cap.

This part of the proposal has great potential for the enhancement of the setting of the identified listed cottages, and of the character and appearance of the conservation area, but as currently submitted there would be some harm (albeit reduced) to the significance of these heritage assets, fundamentally due to design. While there has been an improvement with the revised plans, this would still lie at the lower end of “less than substantial”, although a little lower down the scale.

Conclusion

Considering the above, and that planning history for this site and that policy and guidance has not changed since the refusal of the 2013 proposal (2013/2217/FUL), there cannot fail to be a finding of “less than substantial harm” to the significance of heritage assets. The harm to the significance of Norton St Philip Conservation Area would be at a mid level of “less than substantial” while that to the Church of St Philip & St James (GI*) would be at a lower level.

The proposal would be contrary to Policy DP3 as the significance and setting of the identified heritage assets would not be preserved or enhanced. No heritage benefits have been identified, and the finding of harm to the significance of heritage assets must be weighed against any public benefits of the scheme in the planning balance, giving the required “special regard” and “special attention” as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990.

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Date: 18th August 2022