

**South Gloucestershire Council
Environment & Community Services Directorate
Strategic Planning Policy and Specialist Advice Team
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Memorandum to: Jonathan Ryan, Major Sites Team.
From: Rob Nicholson, Conservation Team, SPP&SA.
Date: 31st March 2022
Our Reference: P22/01300/O
Telephone: 01454 868635

- 1) Site: Land at Sodbury Road Wickwar**
- 2) Proposal: Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.**
- 3) Affected assets, policy and legislation:** The development proposals have the potential to impact on the setting of the Wickwar Conservation Area and the setting of the grade II* Frith Farmhouse and the grade II South Farmhouse. The proposals should therefore be assessed in accordance with the following policies and guidance which seek to protect the significance of designated heritage assets and their settings
 - Planning (Listed Buildings and Conservation Areas) Act 1990
 - Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)
 - National Planning Policy Framework (July 2021)
 - National Planning Practice Guidance –Enhancing and Conserving the Historic Environment (Revised July 2019);
 - Historic England’s Good Practice Advice in Planning Note 2 “Managing Significance in Decision-Taking in the Historic Environment”.
 - Historic England’s Good Practice Advice in Planning Note 3 “The Setting of Heritage Assets (2nd Edition)”.
 - South Gloucestershire Local Plan Core Strategy (Adopted December 2013):
 - Policy CS1 High Quality Design
 - Policy CS9 Managing the Environment and Heritage.
 - South Gloucestershire Local Plan: Policies, Sites and Plan Development Plan Document (Adopted November 2017):
 - PSP17 Heritage Assets and the Historic Environment
 - Wickwar Conservation Area SPG

In the identification of the designated and/or non-designated heritage assets which are affected, or have the potential to be affected by the application proposal, the South Gloucestershire Historic Environment Record (HER) has been viewed. Where heritage assets are identified as affected, or have the potential to be affected, the information

contained on the HER has been used in an assessment of their significance and consideration of the impact on that significance.

4) Comments on the proposal:

The development proposals would see a new housing estate to the west of Sodbury Road but largely set to the rear of the frontage present on this side of Sodbury. Access would be achieved to the northern end of the site by a spur of land running between the north end of the curtilage of the grade II listed South Farmhouse and the south of Windmill Farm. To the west of South Farmhouse, the site currently appears to be occupied by group of portal framed buildings associated with the Windmill Farm that would be cleared. The rest of the site consists of a pattern of enclosed (by hedge boundaries) agricultural fields with the south-eastern corner of the site adjacent to the junction of Sodbury Road and Frith Lane. The proposed "Masterplan Framework" (dwg no.3001) not only shows the extent of the application site but also helpfully shows the extent of the recent approvals for residential development on the eastern side of Sodbury Road, with PK17/4552/O looking to continue the southern extension of Wickwar further south than the scheme proposed as part of this application.

It is only to the west of the existing frontage that will be developed and so the north access between the listed South Farmhouse and Windmill Farm will be left open, although the presence of a new access road into this proposed backland scheme would have a visual impact. There would be in effect three development parcels that appear to adopt a "perimeter development" principle to its layout. The western side edge would feature something of a landscape buffer running north-to-south. There would also be a buffer between the eastern edge of the development and the existing properties beyond.

In support of the application a Heritage Impact Assessment (hereafter the HIA) as prepared by EDP has been submitted which aims to identify how the development proposals would impact on the how the identified relevant heritage assets are currently experienced.

At this point I would confirm that I would agree with the scope of the assessment and the methodology deployed, as I would concur that no other heritage assets other than the three identified would be affected by the development proposals.

Starting with the impact on the Wickwar Conservation Area, with the northern end of the proposed site set some 335 to its southern boundary, I would agree with the HIA that the intervisibility between the conservation area and the application site would be limited to the views to the south-west although these views still contribute to the rural setting of the conservation area which the Wickwar Conservation Area Advice Note identifies as being of "special interest".

I would also agree that the application site does not form part of any key view out of or into the Wickwar Conservation Area. To put it simply, the application site forms part of the rural landscape that contributes to the setting and accordingly character of the Wickwar Conservation Area. As the site only forms a wider "part" of the setting, the commensurate impact of the urbanisation of this site on the setting of the Wickwar Conservation Area would only be partial or critically not significant. This is where the findings of the HIA and myself diverge, as while the impact may be limited, I would

disagree with the identified magnitude of harm and the terminology used in how it is expressed.

The HIA states that the development proposals would only result in a “*very minor degree of change*” to the character of the Wickwar Conservation Area (para. 3.13) and along with the mitigation measures proposals overall the proposed development “*would impart little change to the conservation area’s wider setting and the assessment concludes that its character and appearance would be preserved*” (para. 3.15).

In my view the as the HIA itself identifies, the further urbanisation of the setting of Wickwar will impact on how the village and conservation area are experienced from the approach and departure to the Sodbury Road to its south, as the connection between the historic core and its rural landscape setting, of which is of special interest to the character of the conservation area, would be further eroded as the spatial relationship between the two becomes increasingly separated by new residential development. Moreover, the previous simple and abrupt transition from open countryside to modern edge of village to historic core has already been distorted by recent modern development which has seen the modern edge of village significantly increased on one side of the road. The proposed development would only exacerbate the impact or experience of the conservation area being increasingly enclosed by an extensive suburban extension and so the perception of the historic sense or scale of the village would be further diminished. Therefore, along with the direct impacts of the proposed development, there are also a cumulative impact to also consider here.

In light of the above, while I would agree with the HIA that the impacts of the development would be limited, I would advise that the impact of the development proposals on the setting of the Wickwar Conservation Area would result in a degree of change in its setting which would be harmful to its “special interest” and ultimately significance.

Moving onto the grade II* listed Frith Farmhouse, due to the separation distance between the application site and Frith Farmhouse (approximately 440m to the west at its closest point) and existing intervening features that result in no intervisibility between the two, the HIA concludes that the proposed development will have no impact upon the setting of the designated heritage asset.

From visiting the site, while an internal inspection was not undertaken, I would suggest that in light of the local topography and the existing views in a NE direction towards the existing buildings on the western side of Sodbury Road, it is considered that views of the application would be achievable from the windows of the property, especially at higher level. It is acknowledged that in these views the new dwellings may only be partially visible – i.e., upper floors and roofs only, but the change in landscape character will be perceivable with views of the roofscape in particular. I would therefore not agree with the lack of impact as suggested by the HIA, as the proposed development will see an urbanisation of the agrarian landscape that will be perceptible from the grade II* Frith Farmhouse. I would however advise that as the site can only be considered to form a limited part of its wider setting and coupled with the distances involved, the impact on the setting of this designated heritage asset would be limited.

Finally, in respect of grade II South Farmhouse, the impact on setting would be clear and obvious. The case presented within the HIA in respect of this asset is that the urbanisation of its setting which includes land to the west, which from the reviewing the

1840s Tithe Map and its apportionments, indicates that it was historically associated with the farmhouse, would only result in a “very minor degree of less-than-substantial harm”.

The HIA comments in regard to the loss of views are noted, but critically the existing rural setting (backdrop in particular) of the listed farmhouse would be lost as a result of the development proposals. With modern development to the eastern side of Sodbury Road, the land to the north but more importantly the land to the west can be considered to make a positive and material contribution to the setting of the listed building with this land also having a historic association with the farmhouse.

While the backdrop directly to the west may currently feature large agricultural “sheds”, the functional use of these building is evident and contribute to the bucolic setting the farmhouse currently enjoys. Replacing this backdrop with a residential estate would be materially different, as it would permanently visually and spatially enclose the setting and sever its connection with the rural landscape beyond, land which as above, it was once associated with. The impact of the development proposals would therefore result in a change in the character setting of the building, as it is currently experienced as an historic farmhouse at the rural edge of village, but the development proposals would be it subsumed into a suburban context. The resultant change in setting would therefore be harmful to the character of the building and detract from how the building is currently experienced. This impact is not uncommon, as when any existing urban area looks to extend out into the open countryside and engages with an historic farmhouse, there is by definition a loss of authenticity, as the rural setting which once provided a narrative for its historic functional origins is lost and so there is always a loss of character when the rural landscape to the farmhouse is urbanised. This loss cannot be avoided in my view; the harm can only mitigated by the sensitive siting (i.e., sufficient buffering), design and scale of the new development.

To conclude, in respect of the considered magnitude of harm, the HIA in my view significantly downplays the potential harm as it is much greater than suggested.

5) Conclusion

As noted above, by virtue of its scale and siting, the development proposals would cause harm to the setting of the Wickwar Conservation Area; the grade II* Frith Farmhouse and the grade II South Farmhouse and so in turn, the development proposals would detract and significance of these designated heritage assets.

As the development proposals would therefore neither sustain nor enhance the significance of these designated heritage assets, they are considered contrary to local plan policies CS9 and PSP17 and sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

In accordance with the Framework, I would consider that the proposals would result in less than substantial harm for all the above assets, however the impact on each asset within this category will vary.

For the Wickwar Conservation Area, I would consider that the proposals would result in less than substantial harm towards the lower end of the spectrum of its considered significance.

For the grade II* Frith Farmhouse, I would consider that the proposals would result in less than substantial harm again towards the lower end of the spectrum of its considered significance.

For the grade II South Farmhouse, I would consider that the proposals would result in less than substantial harm between the middle to lower end of the spectrum of its considered significance.

The application is therefore to be considered within the context of paragraph 202 of the NPPF, which is matter for the decision maker. I would however advise that as harm has been identified, compliance with the requirements of paragraph 199 of the NPPF has not been achieved and so as established through case law and reflected in paragraph 202 of the NPPF, the finding of harm gives rise to what can be regarded as a statutory presumption against the granting of permission.

Subsequently, unless in the “weighing-up” exercise as required by paragraph 202 of the Framework robust material considerations are identified that are considered sufficient to outweigh the identified magnitude of harm, refusal is therefore recommended.

Rob Nicholson
Conservation Officer