

TOWN AND COUNTRY PLANNING ACT 1990
SECTION 78 (AS AMENDED)

**TOWN AND COUNTRY PLANNING (INQUIRIES
PROCEDURE) RULES, 2000**

PROOF OF EVIDENCE

APPEAL BY: Bloors Homes, South West.

SOUTH GLOUCESTERSHIRE COUNCIL
APPLICATION REFERENCE: P22/01300/O.

PLANNING INSPECTORATE APPEAL REFERENCE:
APP/P0119/W/23/3323836

SITE: Land at Sodbury Road, Wickwar, South Gloucestershire GL12 8NT.

DEVELOPMENT: The erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.

Proof of Evidence of Robert Nicholson BA(Hons). BTP. PG Dip. MRTPI. IHBC.

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1. Introduction

- 1.1 My name is Rob Nicholson and I am currently employed by South Gloucestershire Council as a Conservation Officer at South Gloucestershire Council.
- 1.2 The evidence which I have prepared and provided for this appeal (PINS Reference APP/P0119/W/23/3323836) in this proof of evidence is true and has been prepared in accordance with the guidance of my professional institute and I can confirm that the opinions expressed are true and professional opinions.
- 1.3 I hold a degree (Bachelor of Arts with Honours) in Town and Country Planning along with a Bachelor of Town Planning and have been a chartered member of the Royal Town Planning Institute (RTPI) since 2005. I also hold a Post Graduate Diploma in the Conservation of Historic Buildings. I have worked as a Planning and Conservation Officer since 2006 and I am also a full member of the Institute of Historic Building Conservation (IHBC).
- 1.4 My responsibilities primarily require me to advise, assess and report on a range of development proposals that would impact on the historic built environment including minor and major physical changes to existing fabric and the potential impacts caused by changes in the setting of a heritage asset.

2. Scope of evidence

- 2.1 My evidence considers the effect of the development proposals upon the significance of the identified designated heritage assets as a result of a change in setting, which (as established in the consideration of the application subject to this appeal) are the Wickwar Conservation Area, the Grade II* listed Frith Farm, and the Grade II listed South Farmhouse.
- 2.2 Within the case officer's committee report (CD4.9) (from paragraph 5.77), the case officer set out the impacts of the development proposals on these designated heritage assets based on my advice in my consultation response dated 23rd March 2023 (CD 3.4).
- 2.3 Considering each designated heritage asset in turn, I considered that due primarily to the separation distances but also the landscape mitigation measures proposed by amendments to the masterplan prior to determination, the development proposals would not cause any harm to the setting of the Wickwar Conservation Area.
- 2.4 In respect of the Grade II listed South Farmhouse, due to the urbanising impacts on the existing rural setting caused by the development proposals I considered that the change in the setting would be harmful to the significance of the Grade II listed South Farmhouse. In accordance with the Framework, I identified that the magnitude of harm would cause "less than substantial" harm to the significance, of the Grade II listed South Farmhouse at the lower end of the "less than substantial" category.
- 2.5 In respect of the Grade II* Frith Farm I considered that the development proposals would also result in a change in setting that while limited, for the reasons set out within this proof of evidence, would be harmful to the significance of the Grade II* designated heritage asset. In accordance with the Framework, this change would cause "less than substantial" harm to the significance of the Grade II* listed Frith Farm towards the lower end of the "less than substantial" category.

3. Relevant Planning Policy & Guidance

Planning (Listed Building and Conservation Areas) Act 1990

- 3.1 Sections 66 and 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (1990 Act) require that in determining development proposals, Local Planning Authorities should pay special attention to the desirability of preserving the building or its setting or any features of special architectural or historic interest, and preserving or enhancing the character and appearance of a conservation area.

National Planning Policy Framework (CD4.7)

- 3.2 **Paragraph 199:** *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.*
- 3.3 This paragraph makes it clear that great weight should be given to harm caused to any designated asset and that this great weight increases further where, as here, the importance of the asset is further heightened, given Frith Farm's is designation as Grade II* listed building.,
- 3.4 **Paragraph 200:** *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.*
- 3.5 The relevance of paragraph 200 to this appeal is that regardless of the considered magnitude of harm, a clear and convincing justification is required for that harm to be permitted.
- 3.6 Of relevance also to this appeal is considered to be the Annex 2: Glossary definition of the setting of a heritage asset:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral".

Local Planning Policy

- 3.7 Policies of the South Gloucestershire Local Plan (2017) (CD4.5) should be given weight in accordance with the extent to which they are consistent with the NPPF, as per paragraph 219 of the NPPF.
- 3.8 With the above in mind, the following policies are considered applicable and of significant weight.
- 3.9 **Policy PSP17** of the South Gloucestershire Policies Sites and Places Plan DPD (Adopted 2017) "*Heritage Assets and the Historic Environment*" looks to ensure any

development proposals serve to protect and where appropriate enhance or better reveal the significance of heritage assets and their settings and ensure that any heritage assets are conserved in a manner appropriate to their significance. In looking to provide protection for all heritage assets, Policy PSP17 looks to provide a comprehensive policy framework for the consideration of any proposals that relate to listed buildings, conservation area, locally listed buildings, sites of archaeological interest, historic park, gardens and battlefields and non-designated heritage assets. In light of the primary heritage related matter in the consideration of this appeal being the impact of a development proposal on the setting of a listed building, the following policy guidance on the general principles for development that impacts on the significance of a listed buildings, the importance of understanding the significance of any relevant asset and how the impact of a development proposals on the significance of a heritage asset is to be assessed are considered to be of direct relevance.

General Principles

Listed Buildings: *Alterations, extensions or changes of use to listed buildings, or development within their setting, will be expected to preserve and, where appropriate, enhance those elements which contribute to their special architectural or historic interest, including their settings. Where development proposals affect listed buildings whose architectural or heritage significance has been degraded or eroded, the Council may seek the implementation of measures and/or management plans to secure the restoration of the heritage assets and/or their setting or contributions towards such works.*

Understanding the Heritage Asset and the Impact of Development

Development proposals involving or affecting heritage assets should demonstrate:

- *the significance of the heritage asset(s) affected;*
- *the impact of the proposal on the significance of the heritage asset(s) and their setting(s); and*
- *how the development will protect, enhance or better reveal the significance of the heritage asset(s) and their setting(s).*

The level of detail should be proportionate to the significance of the heritage asset(s) affected and the nature of the works.

Assessment of development which affects the conservation or enhancement of a heritage asset

The conservation of South Gloucestershire's heritage assets is a priority for the Council and, as a consequence, where development would result in harm to the significance of a heritage asset or its setting, planning permission will only be granted when it can be clearly demonstrated that all of the following can be met:

- *the proposal results in public benefits that outweigh the harm to the heritage asset, considering the balance between the significance of the asset affected, the degree of harm and the public benefits achieved;*
- *the harm to the heritage asset is minimised and mitigated through the form and design of the development and the provision of heritage enhancements; and*
- *the heritage asset will be properly recorded to professionally accepted standards. Where the loss of the whole or part of a designated or non-designated heritage asset is acceptable under this policy, the Council will ensure, via conditions or legal undertaking that all reasonable steps have been taken to ensure that development will proceed after the loss has occurred. This is to ensure that needless harm to heritage assets does not occur.*

- 3.10 National Guidance in the form of **Historic England's "The Setting of Heritage Assets: Historic Environment Good Practice Advice, Planning Note 3 (Second**

Edition), Historic England, 2017 (CD4.12) is also considered to be of relevance to this appeal as this document considers that setting does not just relate to visual considerations, but also ‘the way in which we experience an asset in its setting is also influenced by other factors such as: noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.

- 3.11 The consideration of “setting” also includes a whole range of attributes which may be considered intangible, cultural or intellectual as well as sensory, and the guidance advises that these should also be considered in defining the contribution to values and significance. The list of attributes contained within this document is expansive, but of relevance to this appeal are considered to be the following points:

The asset’s physical surroundings

- *Topography*
- *Aspect*
- *Orientation and aspect*
- *Openness, enclosure and boundaries*

Experience of the asset

- *Surrounding landscape or townscape character*
- *Views from, towards, through, across and including the asset*
- *Intentional intervisibility with other historic and natural features*
- *Visual dominance, prominence or role as focal point*
- *Tranquillity, remoteness, ‘wildness’*
- *Cultural associations*

- 3.12 The reason why the above attributes are considered to be of relevance is that they represent some of the key visual and environmental features that help define the characteristics of the existing site.

- 3.13 In terms of the attributes of a proposal with potential for impacts on setting, the following are deemed to be of relevance.

Location and siting of development

- *Proximity to asset*
- *Position in relation to relevant topography*
- *Position in relation to key views to, from and across*
- *Orientation*

Form and appearance of development

- *Prominence, dominance, or conspicuousness*
- *Competition with or distraction from the asset*

Wider effects of the development

- *Change to built surroundings and spaces*
- *Change to skyline, silhouette*
- *Noise, odour, vibration, dust, etc*
- *Lighting effects and ‘light spill’*
- *Change to general character (eg urbanising or industrialising)*

- 3.14 The attributes above are considered to be relevant to this appeal, as they represent the key environmental changes and impacts that help form the basis of the assessment

and understanding of the effect of the development proposals on the identified heritage assets.

4 The Affected Designated Heritage Assets, Setting and Significance.

- 4.1 The circa 7.89 hectare Appeal site is comprised of agricultural land in the form of a pattern of enclosed fields located to the west of Sodbury Road and to the south of the historic market village of Wickwar. The southern boundary lies in close proximity to Frith Lane, and not far from its junction with Sodbury Road with Frith Lane possessing the character of the typical “country lane” due its narrowness, informality (lack of pavement/ kerbing) and roadside hedges providing a sense of visual enclosure. The site appears to be generally flat also though there is some variance in levels across the site and beyond the site as the land does appear to rise to the west.
- 4.2 The southern Sodbury Road approach to the village of Wickwar has recently seen a significant change in character following the recent and further extension of residential development on the eastern side of Sodbury Road. The green fields of the western side can however provide relief to the urbanising effect on the eastern side by providing retained views out into the surrounding rural landscape. Therefore, while the appeal site lies in part to the rear of an existing frontage of development on the western side of Sodbury Road, the change in landscape character as a result of the Appeal proposals would have a significant impact both as result of its own landscape impact but also the cumulative impact with the development on the eastern side of Sodbury Road.
- 4.3 As set out within my first heritage consultation response (dated 31st March 2022) (CD 3.35) I confirmed that the proposed residential development of the relevant fields south of Wickwar would not result in any physical impact on any designated heritage assets, as none were located within the application site. I did however consider that (as noted previously) that the following assets may experience impacts through a change in setting:
- The Wickwar Conservation Area
 - The Grade II South Farm
 - The Grade II* Frith Farm
- 4.4 ***The Wickwar Conservation Area***
The Wickwar Conservation Area was designated in 1973 with its special historic character considered to be derived from its medieval burgage plot street pattern that gives the village its distinctive linear character.

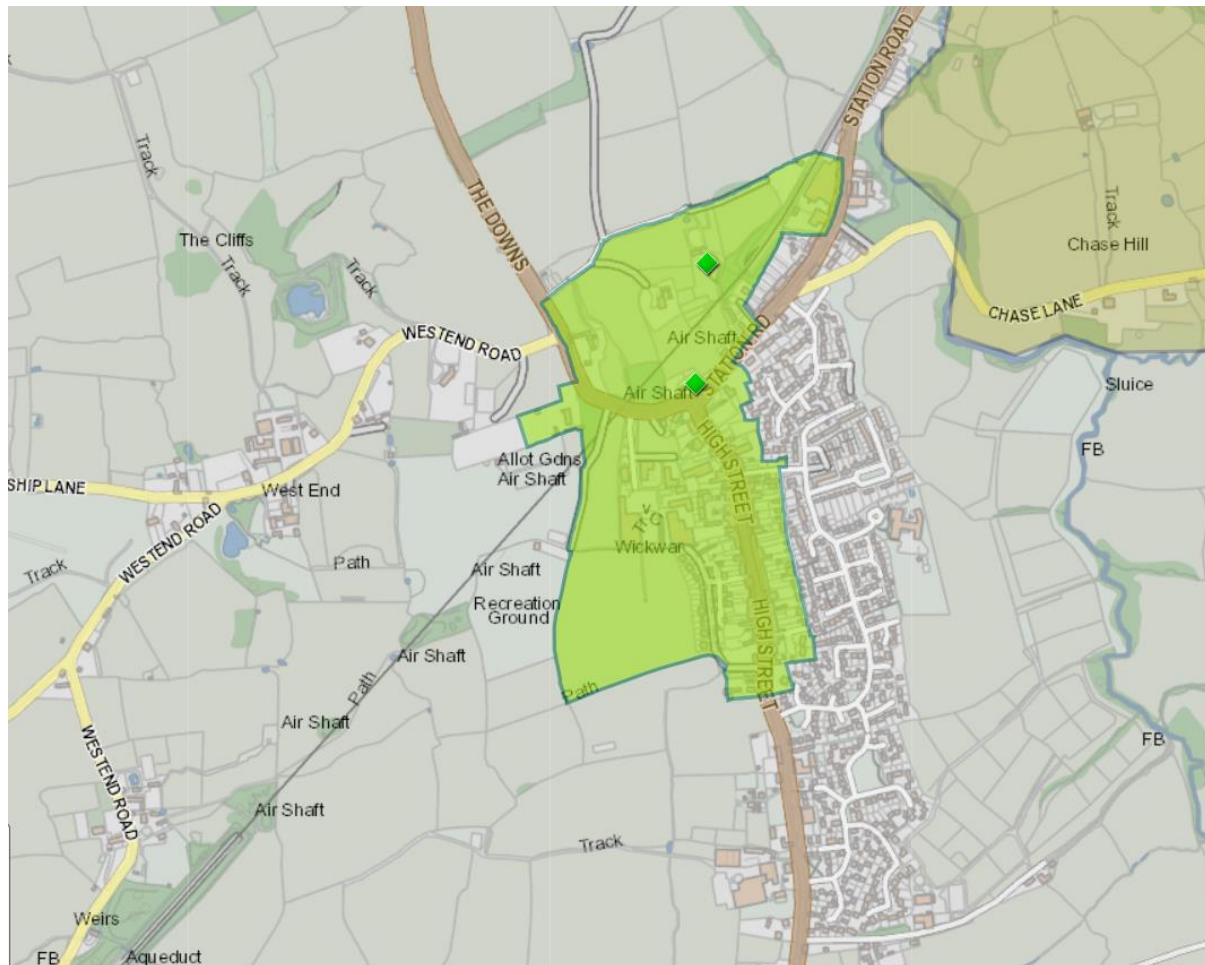


Fig 1. The village of Wickwar and its conservation area (outlined and shaded in green). From KYP.

- 4.5 Wickwar lies on the south-west edge of the Cotswold scarp, approximately 77m above sea level. The main part of the village is situated on a flat spur of land running north-south, with the High Street parallel to it. The ground on the west and east sides of the town drops substantially to about 50m above sea level. The Little Avon river runs northwards, parallel with the town on its east side, as shown on the above map.
- 4.6 Developed on a main trade route, the church and a probable Saxon village lie on a second high area of ground to the north of the village which is considered to have been recorded in Domesday Book of 1086 as "Wichen". The main core of the village as seen today is considered to have been founded in the 13th century and the characteristic burgrave plot layout almost certainly dates from its inception. The Calendar of Charter Rolls records a market and fair was granted to Wickwar in 1285.
- 4.7 The wide town High Street is enclosed on both sides (east and west) by terraces of predominantly houses which are positioned hard against the pavement. It is considered likely that the broad, straight central portion of the High Street would have served as market place, marked out by a stretch of burgages set back on the west side of the street. This area is depicted on the following map where it has been laid over a digital Ordnance Survey map of 1995. This layout has also remained unchanged since the Tithe Map of 1839.

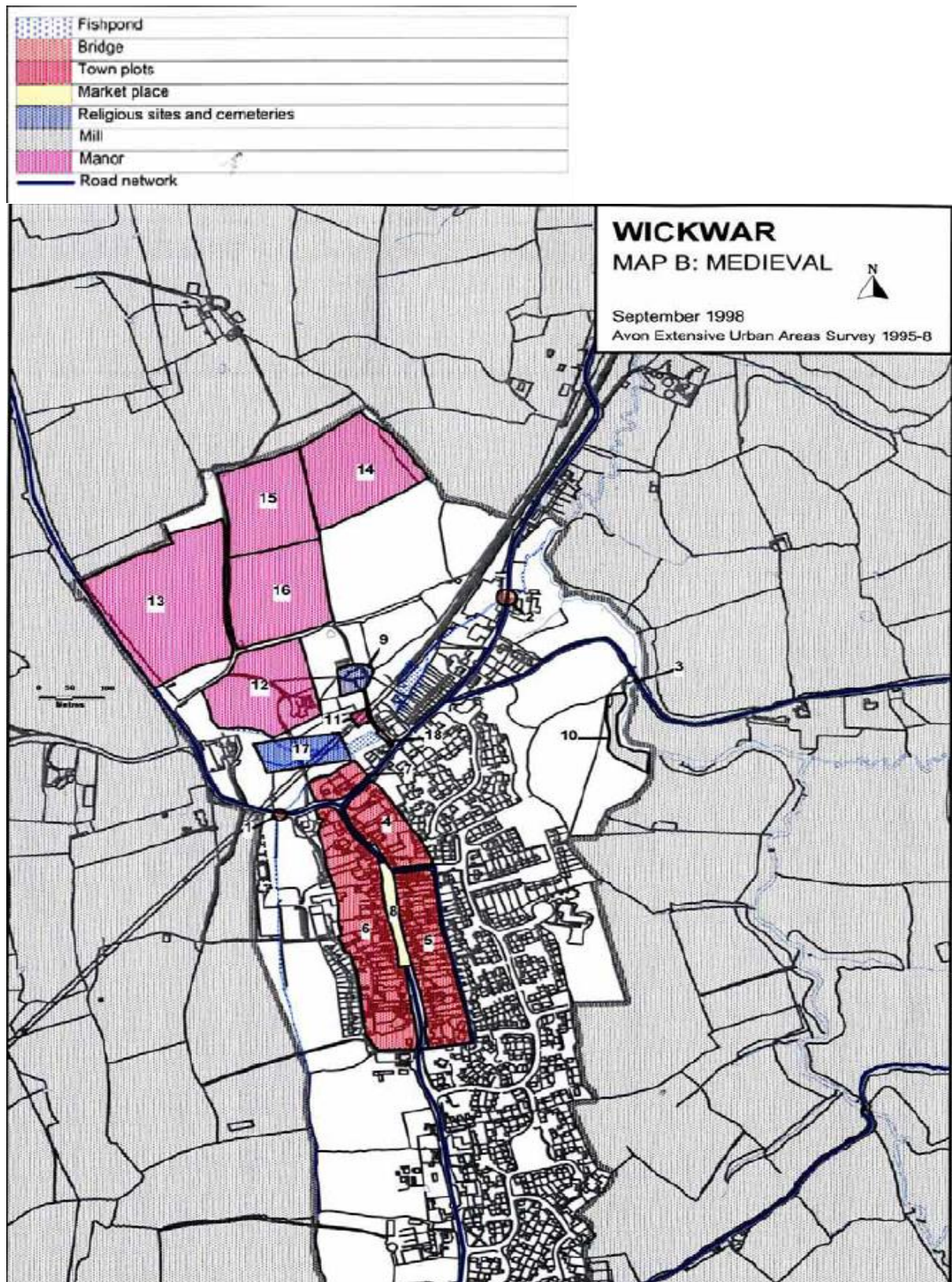


Fig. 2 The Medieval Layout with key above (from Avon Extensive Urban Areas Survey 1998)

- 4.8 The Wickwar Conservation Area SPG Advice Note (Adopted 29/10/98) (CD 4.6) recognises that the Conservation Area boundary was drawn to include the historic core of the medieval village comprising of the High Street and its associated back lanes,

which are identified as two distinctive character areas. The Wickwar Conservation Area Advice Note also identifies a further two character areas, the “Church and Area to the North” and “The Land to the West.”

- 4.9 In regard to the “High Street” character area, the Wickwar Conservation Area Advice Note SPG (CD4.6) identifies that the terraces flanking either side of the High Street give it an “enclosed urban feel”, which contrasts with its rural setting and the transition from open countryside into a formal townscape can still be appreciated from mainly the approaches to the north and this adds to the interest of the village.
- 4.10 The buildings that make up the terraces that line the High Street consist of a range of styles, materials, form and scales, and the formality of the frontages contrast with the informality of the rear burgage plots and access lanes. Overall, while the village has seen a number of phases of modern development, especially to the south and along predominantly the eastern side of Sodbury Road, the historic character and medieval layout of this former market village remain largely intact and appreciable and this character can be considered to be enhanced by the variety of historic building styles, from simple vernacular cottages to more polite, formal townhouses, of which most are listed.
- 4.11 In contrast to the formal enclosure provided by the terraces fronting onto the High Street, the northern part of the conservation area has a looser grain and more open character which allows for views to and from the undulating topography of the landscape and the prominence of the Grade II* Church of Holy Trinity.
- 4.12 The Wickwar Conservation Area boundary also includes the fields to the direct west of the High Street to protect village settings and views both into and out of the conservation area. “The important features” map within the SPG (page 3) clearly identifies the important views from the west of the High Street looking east. The modern developments to the south and east were excluded.
- 4.13 As an historic market village, the surrounding rural landscape can be considered to make an important contribution to its character as these surrounding fields help retain a rural and tranquil setting for the village. Historically there would have also been a functional link between the village and its agrarian landscape.
- 4.14 The importance of the rural setting is also highlighted within the consideration of the “The Land to the West” character area within the Wickwar Conservation Area SPG Advice Note, where the open land to the west is identified as making an important contribution by providing the foreground to the views towards the High Street and the prominent and considered landmark listed malthouse.
- 4.15 Under the “Other areas/ features requiring enhancement” and “the adjoining areas of modern development” headings, the Wickwar Conservation Area Advice Note does however recognise that *“new development on the edge of the historic village core and on approaches to the village has resulted in a loss of views and appreciation of the surrounding landscape setting”*.
- 4.16 While the western side of Sodbury Road has seen little change since the Wickwar Conservation Area Advice Note SPG was adopted in 1998, the eastern side has been subject to successive development phases and southern expansion.
- 4.17 In light of the scale and location of the two recent phases of residential extension to the south of the village on the eastern side of Sodbury Road, in regard to the wider village character, these recent developments to the east of Sodbury Road can be

considered to have significantly exacerbated the harm to views and landscape character that was identified within the Wickwar Conservation Area SPG in 1998. Any further development on the approaches to the village could be considered to simply exacerbate the existing loss of views and the appreciation of the landscape setting that the Wickwar Conservation Area Advice Note SPG identifies.

- 4.18 In regard to the character and appearance of the Wickwar Conservation Area, the key views which need to be protected in the interest of its setting are identified within the Wickwar Conservation Area SPG, in particular set out within the map associated with the Preservation and Enhancement Strategy as set out below.

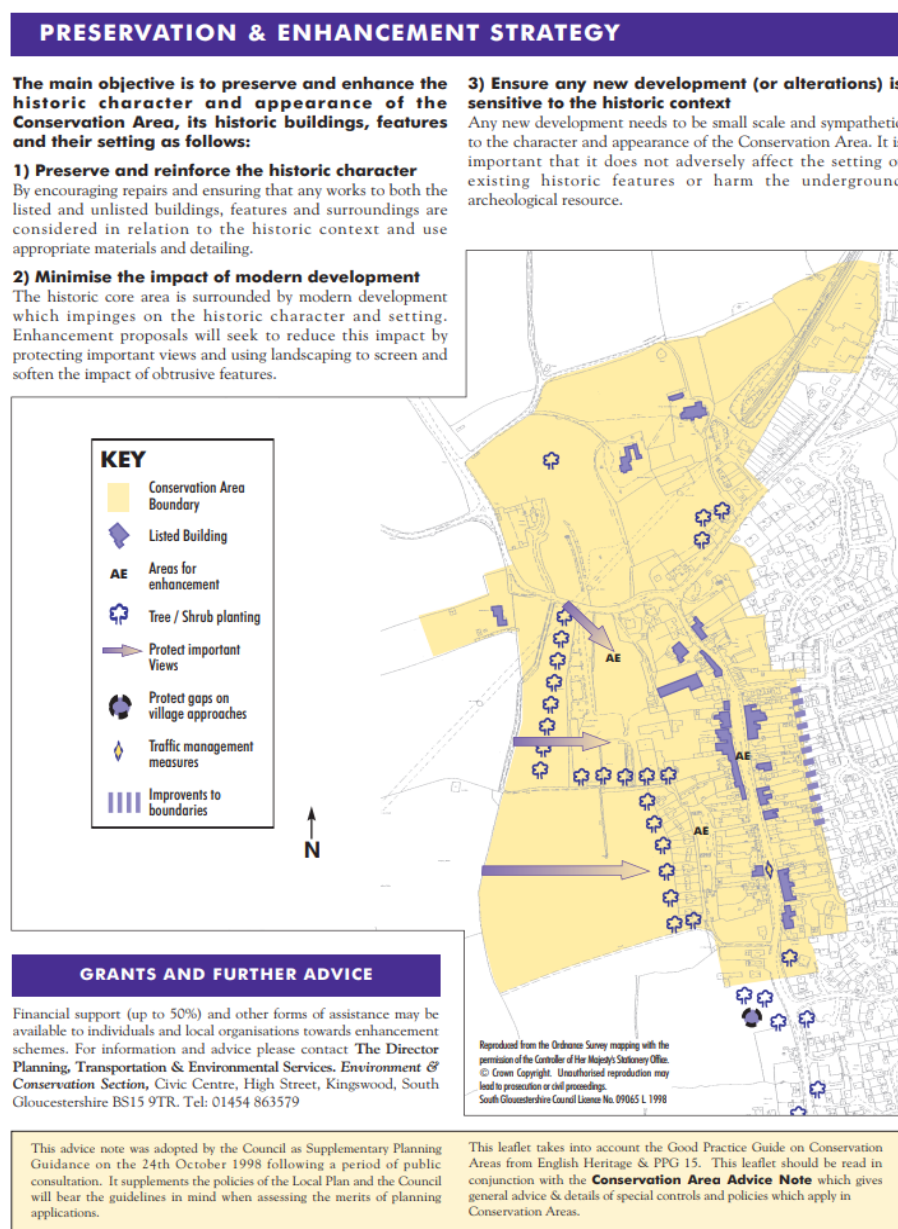


Fig. 3. The Preservation and Enhancement Strategy Map contained with the Wickwar Conservation Area Advice Note SPG.

- 4.19 These identified views from the west of the Conservation Area remain unaltered since the adoption of the Advice Note in 1998. The identification of these “key views” helps to determine the sensitive areas of the surrounding landscape which could be

considered to materially contribute to the “setting” of the Conservation Area, i.e., land beyond the boundaries of the Conservation Area that needs to be given a degree of protection in the consideration of any development proposals to ensure the identified views are protected and preserved.

- 4.20 In regard to the contribution the southern part of the village makes to the Conservation Area, as the Wickwar Conservation Area Advice Note set out, the conservation area boundary did not include modern developments to the south or east of the village where the transition from rural setting to historic settlement core has already been significantly changed due to the development of these modern suburban edges.
- 4.17 Overall, it is considered that the relationship between the village and its surrounding rural landscape should be preserved, as the spatial and visual connections that are appreciable in views from the approach roads can be considered to contribute to the character of the village by emphasising its strong rural setting.
- 4.18 When considering the potential impacts on the Wickwar Conservation Area, while key views in and out of the Conservation Area remain, and in the interests of the character and appearance of the Conservation Area, need to be preserved in accordance with the SPG note, in a number of areas the views out from the Conservation Areas have significantly changed or been eroded by modern development. .

South Farm (Grade II listed)

- 4.19 South Farm is a Grade II listed building. As per its listing description, its origins date from the early to middle of the eighteenth century. It was listed in 1984.
- 4.20 I consider that its heritage significance of the Grade II listed South Farm is primarily derived from its architectural and aesthetic interest and the historic interest of its physical fabric. However, I also consider that the rural setting of South Farm can be considered to make a contribution to its significance. I consider that being able to experience an historic farmhouse within its agricultural setting, the historic functional connections of a farmhouse with its agricultural surroundings remain appreciable and as a result, a narrative of the buildings origins is preserved and with it a sense of authenticity. Consequently, along with the visual experience, the appreciation of the historic function and origins of the farmhouse can be considered to all add to the historic interest of South Farmhouse.

Firth Farm (Grade II* listed)

- 4.21 Frith Farm is a Grade II* listed building, circa late seventeenth century although the listed description notes that it may incorporate an earlier building. The historic evolution of Frith Farm has been previously recorded within an Historic Building Report prepared by notable conservation architect and historian Kay Ross in support of a scheme of restoration (dated August 2011 and CD 6.3) where the origins of Firth Farm could be traced back to 1347.
- 4.22 Frith Farm was listed in 1952 as a Grade II* listed building, which as a Grade II*, is a heritage asset that Historic England identifies as being “particularly important building[s] of more than special interest” with Historic England stating that only 5.8% of all listed buildings are designated as Grade II*.
- 4.23 In light of its architectural style and scale, the Grade II* Frith Farm can be considered to be of a relative “high status” with the final sentence of its listing citation describing the building as:

“A very good, although somewhat altered, example of a high class vernacular/ gentry house, built for a surgeon who never occupied the property”.

- 4.24 The reference to “vernacular” relates to the considered “Cotswolds vernacular”, the regional style which comprised of common elements which are primarily large dormer gables, but also such features as diagonal chimneys, ovolo mouldings and plan form. Linda Hall’s *“The Rural Houses of North Avon and South Gloucestershire (1983)”* also established that the gentry at the time Frith Farm was constructed were also actively farming their lands themselves and so as in the case of Frith Farm, such “high class” country houses were also often also functioning farmhouses. The use of Frith Farm as a working farm was also discussed within the Kay Ross Historic Building Report noted above where it was stated that the agricultural use of Frith Farm was considered to have continued up until the 1980s when it then fell into a state of disrepair. Due to its evolution over 300 years and in particular the changes carried out within the 17th and 18th centuries which saw Frith Farm change from a “modest yeoman’s house” to a “high status dwelling”, within the Historic Building Report Kay Ross summarised Frith Farm as being a *“wonderful example of a Gloucestershire farmhouse”*.
- 4.25 Below is an extract from the 1840 Tithe Map which shows the apportionments associated with Frith Farm with the relevant land highlighted in yellow for ease of reference.

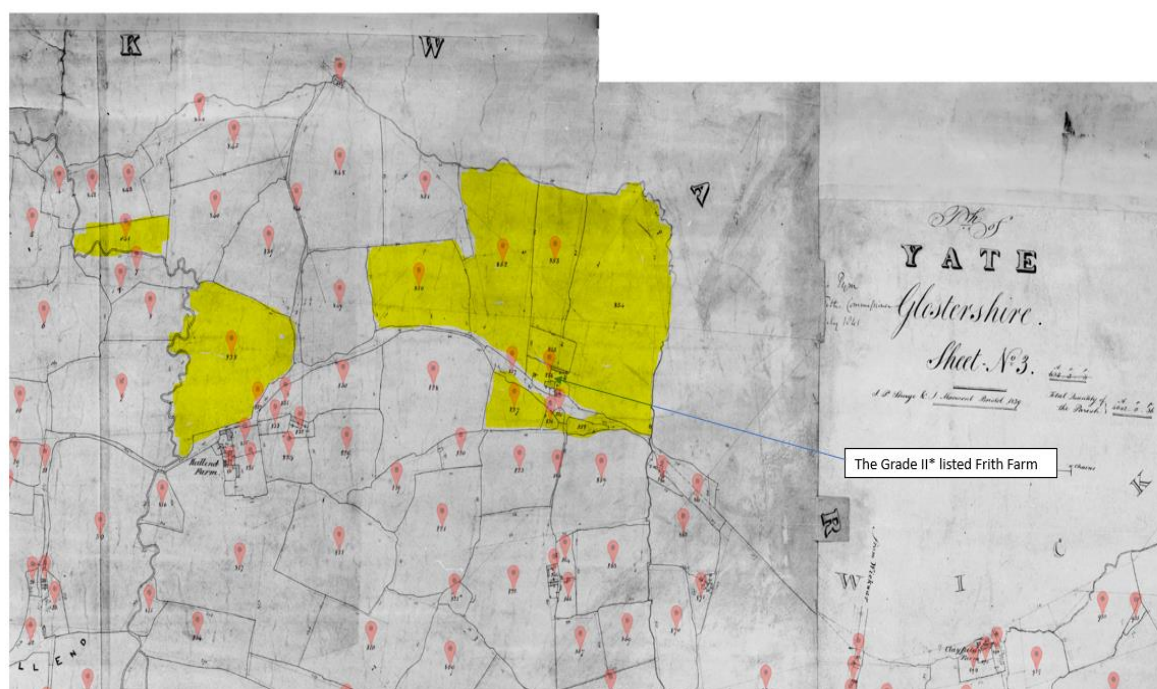


Fig.4 An extract of the 1840s Tithe with land associated with Frith Farm highlighted in yellow.

- 4.26 As with the consideration of South Farm, the heritage significance of the Grade II* listed Frith Farm is considered to be primarily derived from its architectural and aesthetic interest and the historic interest of its physical fabric. However, again like South Farm, its rural setting can also be considered to make a positive and material contribution to its significance, as to be able to experience a large vernacular country house within an expansive rural setting helps retain the sense of status, grandeur and prominence within the landscape that Frith Farm has possessed and enjoyed since its construction.

- 4.27 In addition to the rural landscape context, the isolated positioning of Frith Farm is also considered to be of potential historic interest. For as seen in other parts of the Authority's administrative boundary (the "ends" at Cromhall, Talbot End, Rangeworthy Court for example), along with the high status of the building being reflected within the quality of its architecture and scale, its isolated setting can be also considered to reflect the wealth and importance of the owner within the surrounding landscape. Moreover, the position of the building topographically on something of a highpoint especially in views from the west, i.e. from Sodbury Road, can also be considered to reflect the status that the building was intended to project.
- 4.28 Any encroachment into the existing setting of Firth Farm therefore would be harmful to its significance through mainly a loss of prominence but also the erosion of the sense of isolation from the village boundaries of Wickwar.

5 Impact of the development proposals on the settings of affected heritage assets

5.1 ***The Wickwar Conservation Area.***

With the northern end of the appeal site located approximately 335m from the southern boundary of the Wickwar Conservation Area, I agreed with the Appellant that as set out within their initial Heritage Impact Statement (CD1.13) (hereafter the HIA), that the intervisibility between the Wickwar Conservation Area and the Appeal site would be limited to views looking out from the south-west of the Conservation Area. However, due to the separation distances involved between the Appeal site, the Wickwar Conservation Area, the intervening features and following the amendments made to the layout and landscaping of the development proposals, I agreed while the proposals would result in a dramatic change in landscape character (as a matter dealt with by Jane Jarvis), the development proposals would not cause harm to the character and appearance of the Wickwar Conservation Area as a result of a change in setting to the village more generally.

The Grade II listed South Farm

5.2 The functional association between the Appeal site and South Farm is a current but also an historic one which can be considered to add a degree of historic interest to the appeal site.

5.3 As noted previously, national guidance sets out a number of attributes that can be considered to contribute to the values and significance that a particular site may possess in the consideration of its role as part of the setting of a heritage asset.

5.4 Notwithstanding the expansive range of potential attributes, the contribution the Appeal site makes to the setting of South Farm can be considered to be a simple one in that it plays an important role in providing a wider rural setting in which the historic listed farmhouse can be experienced, an experience that is enhanced by a PROW that runs through the farmstead. Along with providing an immediate and wider rural context, this also helps South Farm ensure its functional origins remain legible which adds to the historic interest and in turn significance through the subsequent sense of authenticity its setting provides.

5.5 Due to the screening provided by other buildings and features along the western side of Sodbury Road, the relationship between the farmhouse and its extensive holding to the west is more appreciable in views from the west (rear), where (from the PROW that runs through the farm on an east-west axis) you can experience the farmhouse within its direct farmstead setting and wider rural landscape.

5.6 In the views from the west looking east, the Appeal proposals would appear as a significant visual intrusion into the rural landscape which would also erode the appreciable current spatial and visual connection between the farmstead and its historically associated land. Furthermore, in approaching the farmstead from the west, views of the new residential development would also significantly detract from the current gradual and pleasing experience of the transition from rural landscape to farmstead.

5.7 In contrast to the open rural landscape views to the west in which the farmhouse can be considered to be directly connected with, views from Sodbury Road are more limited to largely an appreciation of the principal elevation and immediate curtilage. There are partial views of the large farmstead buildings to the west, but the line of mature willow

trees helps soften and green the views of the street scene within the immediate vicinity. This parcel of land is also enclosed to its roadside boundary by a low stone wall that appears as an extension (from its south-eastern return) of the boundary wall that encloses the front and southern side curtilage of South Farmhouse. While sections of the stone boundary wall may be covered in vegetation (a situation that could be easily reversed), collectively due to their similar construction/appearance and scale (in respect of length), these stone boundary walls on the western side of Sodbury Road can be considered to make a positive and material contribution to the character of the street scene. While the boundary wall enclosing the front curtilage of South Farmhouse would be considered curtilage listed, by reason of its age and the contribution it makes to the character and appearance of the locality, I would consider that the existing roadside stone boundary wall enclosing the appeal site could be considered to represent a non-designated heritage asset. The development proposals would result in a section of this stone boundary wall being removed to facilitate the new main point of vehicular access. The removal of a section of this historic boundary wall would therefore result in the erosion of the visual contribution the boundary wall makes in existing views, which would consequently result in a loss of character.

- 5.8 Overall, in respect of South Farm it is considered that in light of its existing setting and how the farmhouse is experienced from Sodbury Road and the layout and siting of the Appeal proposals, the greater impacts on setting will be felt to the rear – in land to the west as explained above. By reason of the loss of its immediate existing rural landscape setting, the Appeal proposals would cause a degree of harm to the significance of the Grade II South Farm through building in its setting.
- 5.9 In regard to the considered magnitude of harm, following the revisions that were made to the proposed layout and landscaping which would see mitigation measures initially proposed enhanced, I am in agreement with the findings of the submitted Heritage Addendum that the harm to the significance of the Grade II South Farm would be towards the lower end of the “less than substantial” category of harm.

The Grade II* listed Frith Farm.

- 5.10 When looking to establish, qualify and subsequently quantify the level of historic interest that a particular site may contribute to the setting of a heritage asset, as per the relevant national guidance set out previously, a number of attributes can inform the assessment and elevate the historic interest of a particular site.
- 5.11 Historic cartographic evidence in the form of the 1840s Tithe Map (Fig. 4) does not suggest that there was any common ownership at that time between Frith Farm and the Appeal site. There is also no evidence of any functional association and there are also no considered “designed views” of the Appeal site from the Frith Farm. However, as in the consideration of the impact of the development proposals on South Farm, while the significance of the Grade II* Frith Farm can be primarily derived from its architectural style and fabric, its rural setting also in my view makes a positive contribution to its significance, for as noted within the previous section, to be able to experience the Grade II* listed Frith Farm within a rural and isolated setting helps retain an appreciation of this vernacular high-class country house which reflected the wealth and status of its original owner.
- 5.12 In considering the extent of the setting of Frith Farm, the appeal site in my view makes a contribution to the appreciation of the wider rural landscape setting in which Frith Farm is experienced. The Appeal site is therefore considered to form part of the setting of the Grade II* Frith Farm. The role of the Appeal site forming part of the setting of the Grade II* Frith Farm was also confirmed within the Archaeological and Heritage

Baseline Assessment produced by EDP (Dated December 2021) (CD 1.12) that was submitted in support of the application (paragraph 4.33)/

Grade II* listed building Frith Farm (NHLE: **1128768**)

- 4.33 The Grade II* listed building Frith Farm is located c.180m from the site boundary to the south-west and is visible from within the site. Part of the site forms part of the setting of this listed building and its setting and contribution to its significance is considered in greater detail as per Step Two of the assessment process in **Section 5** below.

- 5.13 In regard to the considered contribution the Appeal site makes to the setting and in turn significance of the Grade II* listed Frith Farm in allowing it to be appreciated, with the Appeal site comprising of agricultural fields enclosed by hedgerows as part of a wider agrarian landscape, the Appeal site can be considered to make a positive contribution to the rural setting in which Frith Farm is experienced, both in selective views of Frith Farmhouse from the surrounding landscape and views from Frith Farmhouse itself out towards its pastoral setting. The key views that will be impacted by the development proposals will be discussed in detail below but the positive contribution the Appeal site makes to setting of the Grade II* Frith Farm was also identified within the Archaeological and Heritage Baseline Assessment within paragraph 5.33, where, as set about below, views from the Appeal site allow Frith Farm to be experienced as “country farmhouse set within a rural landscape”.

- 5.33 From the site, the house is visible from the two large fields on the western edge which adjoin the paddocks that lie adjacent to the house. The local topography dips down to the valley of a small stream in this area with the land around Frith Farmhouse beyond and with the farm and its outbuildings at the crest of the rise. From the northernmost of the two fields, a clear view of the house is achieved (**Image EDP 12**), particularly at the southern end of the field, and it is experienced from farmland as a country farmhouse set within a rural landscape. Given the nature of this experience, this field is considered to make, at its southern end a minor contribution to the significance of the listed building, with a lesser, very minor contribution from the land at the northern end of the field.

- 5.14 In light of the identified positive contribution the appeal site makes to the setting of Frith Farm and the acknowledged contribution setting makes to the significance of the designated heritage asset, any change in character of the appeal site which results in a loss of the positive contribution it makes to the setting of Frith Farm would result in harm. The potential impact of the Appeal proposals on the contribution the appeal site makes to the setting of the Grade II* listed Frith Farm was also identified within the Archaeological and Heritage Baseline Assessment (CD 1.12) within paragraph S4, as noted below where the potential to cause “less than substantial harm” was identified.

- S4 The assessment demonstrates that the land at the site makes no more than a minor contribution to the significance of any of these three designated heritage assets and therefore development that causes the loss of this contribution would be likely to only result in ‘less than substantial harm’ at the lower end of the spectrum to the heritage asset, or assets. Any harm should be able to be mitigated through careful and considered masterplanning, and ultimately any residual effects would be of such low magnitude as to be considered acceptable. In this respect, the settings of designated heritage assets do not present a major constraint to the site’s development as proposed.

- 5.16 While paragraph S4 above identifies a considered magnitude of harm, there is the suggestion that this harm could be mitigated through “careful and considered masterplanning” that would only leave “residual effects” in relation to any considered harm. It is acknowledged that while careful consideration of building heights, development densities, design and materials may be given as part of a high-quality design response, the visual impact of what would appear as the encroachment of built form into the setting of the Grade II* listed Frith Farm would be largely unavoidable in visual terms, as it is the inherent loss of existing landscape character that would cause the sense of visual intrusion and harm into the existing setting.
- 5.17 While I agree that the Appeal site makes only a limited contribution to the wider setting of the Grade II* Frith Farm, any loss of this contribution would cause a degree of harm, which requires “*clear and convincing justification*” as per paragraph 200 of the Framework and given its grade II* status attracts even greater weight than would apply to a grade II building.
- 5.18 To help demonstrate how the development proposals will impact on the Grade II* listed Frith Farm, the main areas of concern I have are with the potential levels of inter-visibility between Frith Farm and the development proposals as a result of a change in the views from both its curtilage and its upper floor windows. Also, as with all development proposals that would encroach into the setting of a listed building, how the urbanising impact is experienced in the wider context was a concern in respect of the appearance and impact of the resulting tandem views of the new development and the listed building.
- 5.19 Starting with the views out from Frith Farm, the photographs show the view east from the curtilage of Frith Farm looking towards Sodbury Road. The curtilage of Frith Farm is slightly elevated in comparison to the PROW which runs through the horse paddocks seen in Fig. 5-7. In this view, the buildings of the recent development to the east of Sodbury Road can be seen in the distance. I consider that in light of the deciduous nature of the trees, views of the existing built form would only increase in the winter months. With views of the development on the eastern side of Sodbury Road visible, the proposed development closer to the building on the opposite western side of the road would be highly visible in this view. The result would be an increase in the sense of built form encroaching into the pastoral landscape setting of the Frith Farm and thus would detract from its setting through change in character but also loss of physical and perceived separation from the main village of Wickwar.
- 5.20 I also consider that along with the views of encroaching built form and loss of perceived spatial separation, the residential development of these adjacent fields would also increase noise and lighting levels which would further exacerbate the sense of loss of rural setting and tranquillity.



Fig.5 Open views east from Frith Farmhouse curtilage



Fig.6 The same view east but at focused to identify the 2½ dwelling that fronts onto the east side of Sodbury Road for ease of reference .



Fig. 7 Aerial photo to identify photographic view point (orange arrow).

- 5.21 In respect of the impact on views from within Frith Farm itself, part of the case presented within the submitted Heritage Impact Assessments (CD1.12 & 1.13) and followed up within the Heritage Addendum (CD2.9) is that while there may be views from the building on its eastern elevations towards the application site, the building was not designed to facilitate such views. The subsequent Heritage Addendum also stated that the impact of any development in views from the eastern elevation would be “barely noticeable”.
- 5.22 While it is correct that the house was not orientated in a manner to afford primary views towards the appeal site (as its façade faces south) I consider that although limited, the visual impact on the development proposals would be felt and understood in views from the upper floor windows contained within the east facing elevation.
- 5.23 At first floor level on the east facing elevation are 2no. bedroom windows and a first-floor landing window that look out towards the application site.
- 5.24 The photograph below is the outlook from the landing window looking towards the direction of the appeal site.



Fig. 8 Partial framed view from 1st Floor Landing Window

- 5.25 Within this constrained view, the existing development on the east side of Sodbury Road is clearly visible. With the appeal site within the foreground - which is just beyond the hedge, the presence of the additional built form in this view would therefore increase and in my view be readily appreciated. While the impact overall may be considered to be limited, the development proposals would still result in a change in setting which would be harmful to the setting of the Grade II* listed building.



Fig. 9 Focused view of Fig.8 above to help clarify the existing views out towards the appeal site and the existing development on the eastern side of Sodbury Road.

- 5.26 The above photograph is from the same 1st floor landing window on the east elevation of Frith Farm as per Fig.8, but focused to help clarify the views of the appeal site and the existing development on the eastern side of Sodbury Road.
- 5.27 The photograph below is the existing view from the bedroom window on the first floor of the east elevation. Again, while limited, the proposed development site would clearly be visible, as what can be seen in the distance is considered to be the rendered terrace of units that forms the southern end of the first phase of the recent development on the eastern side of Sodbury Road which lies approximately opposite the timber yard on the western side of Sodbury Road with the development proposals would be set to the rear of. The proposed development would be much closer and obvious in the view.



Fig. 10 Partial Farmed view from 1st Bedroom Window

- 5.28 In considering the impact on the wider setting, as I have noted previously the prominent, isolated position of Frith Farm reflects its “high-class”, vernacular “country house” status and so to be able to experience Frith Farmhouse in its current setting is important and, in my view, contributes to its significance.
- 5.29 The below photograph (figure 11) demonstrates the potential tandem views available from the PROW to the north of the application site (to the left of the photograph) that runs through South Farm. In this view, the isolated positioning and distinctive silhouette of Frith Farm on the skyline is clearly visible.

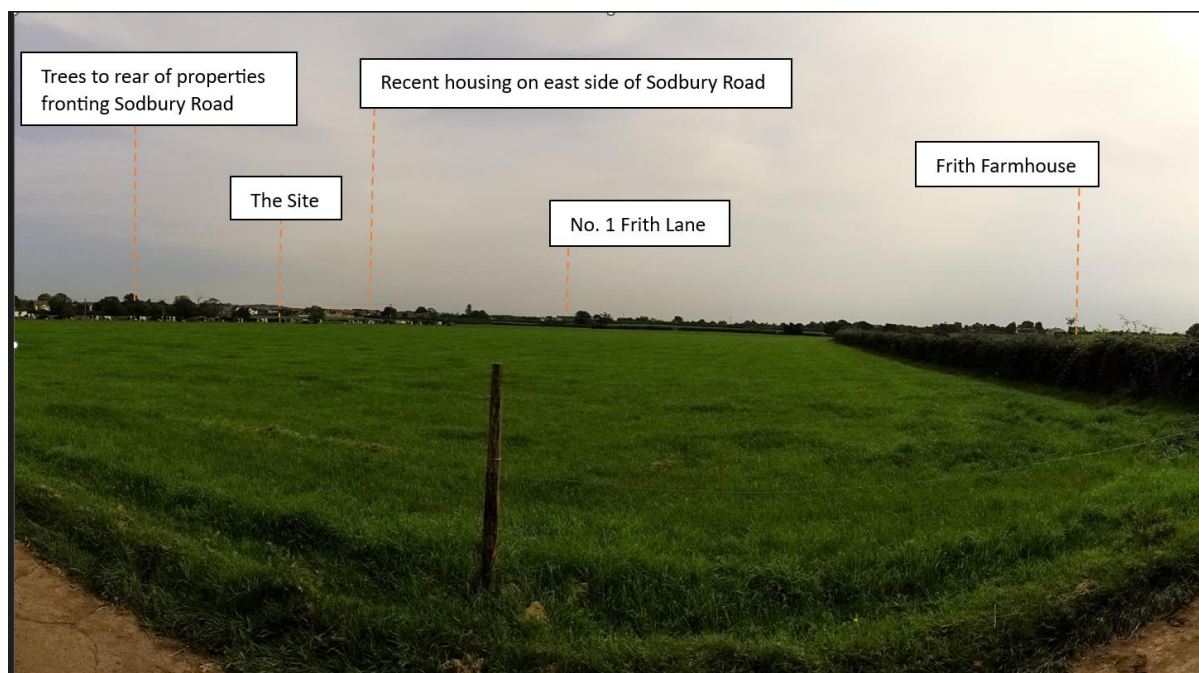


Fig 11 Tandem Views of Frith Farmhouse and the application site.

- 5.30 From this view the Appeal proposals would constitute an encroachment of built form into the existing rural setting of Grade II* Frith Farm and in views across this open agriculture land I consider the loss of prominence of the building would be clearly discernible. The result would consequently be a loss of the building's setting which contributes to its significance.
- 5.31 While the contribution the appeal site makes to the setting and in turn the significance of the Grade II* listed building is limited in that it only forms part of its setting, as this above photograph demonstrates, the Appeal proposals would result in the total loss of the positive contribution the appeal site currently makes to the setting of Frith Farm. Therefore, while the impact and loss of setting may be limited, the development proposals would still result in a degree of change in setting that would be harmful.
- 5.32 Overall, in regard to the impact of the Appeal proposals on the setting of Frith Farm, the development proposals would impact on both views to and from Frith Farm. The impact on these would result in a discernible change in landscape character and relationship between Frith Farm and its rural setting. These changes result in what can be considered an overall impact in the context of the wider setting of the Grade II* Frith Farm, and while the change in setting may be limited, it would be harmful.
- 5.34 In accordance with the Framework, there would be "less than substantial" harm to the setting and so significance of the Grade II* listed Frith Farm and in my view this harm would be towards the lower end of the "less than substantial" category.

6. Conclusion

- 6.1 The Appeal proposals would not cause any harm to the significance of the Wickwar Conservation Area.
- 6.2 The Appeal proposals would cause harm to the significance of the Grade II listed South Farm due to loss of rural setting and the magnitude of harm is considered to be at the lower end of the “less than substantial” category.
- 6.3 In regard to the Grade II* listed Frith Farm, as a building of high status due to the quality of its architecture and scale, its isolated rural setting reflects the wealth and importance of the owner within the surrounding landscape. Frith Farm as a “high-class” vernacular country house positively benefits from being located within a relatively isolated rural landscaped setting.
- 6.3 The Appeal proposals would impinge on this setting, albeit to a limited degree which would result in a loss of significance.
- 6.4 It is therefore considered that for the reasons set out within this proof of evidence, the Appeal proposals would cause harm to the setting of Grade II* Frith Farmhouse which contributes to its significance which comprises “less than substantial” towards the lower end of the “less than substantial” category.