



Land at Sodbury Road, Wickwar

Proof of Evidence of:

Robert Skinner

BA (Hons), MA, ACIfA

In respect of:

Heritage Matters

On behalf of:

Bloor Homes South West

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Section 1

Preamble

- 1.1 This Proof of Evidence on heritage matters has been prepared by Robert Skinner, an Associate at The Environmental Dimension Partnership Ltd (EDP) possessing 15 years of continuous experience in practice as a heritage professional.
- 1.2 My qualifications comprise a BA (Hons) Degree in Anthropology, Archaeology and Art History from the University of East Anglia and an MA Degree in Cultural Landscape Management from the University of Wales awarded with Distinction.
- 1.3 I am an Associate of the Chartered Institute for Archaeologists (ACIfA) and work as a senior member of the Heritage Team at EDP which, as a whole, is a Registered Archaeological Organisation (RAO) with the Chartered Institute for Archaeologists.
- 1.4 My portfolio of project involvements includes the assessment, evaluation and recording of archaeological sites, monuments and remains, as well as the investigation and assessment, including setting assessment, of both standing buildings and structures and historic/designed landscapes and areas across England and Wales.
- 1.5 My undergraduate studies at the University of East Anglia focussed on the history and theory of non-western and western archaeology and world art studies. My post-graduate MA had a vocational emphasis with a focus on landscape archaeology, heritage management and desk-based archaeological assessment. In this regard I studied within the School of Archaeology at the University of Wales under Professor Andrew Fleming and Professor David Austin.
- 1.6 As an experienced heritage professional I have prepared numerous Archaeological and Heritage Desk-based Assessments, Heritage Impact Assessments, Setting Assessments and Environmental Statements to inform and support the determination of planning applications involving designated and non-designated heritage assets and have also written a number of Heritage and Conservation Management Plans.
- 1.7 For example, some of my recent projects where setting assessment has been a primary consideration include the following.
- 1.8 Between November 2022 and June 2023, I carried out a detailed setting assessment for an eight wind turbine scheme in South Wales – Mynydd Llanhilleth Wind Farm, a Welsh Development of National Significance (DNS/3273368). This project included the identification and assessment of impacts on the setting of some 286 individual historic assets within an extensive study area, as well as producing a standalone Heritage Impact Assessment in relation to the setting of the Blaenavon Industrial Landscape World Heritage Site. Both project inputs were well received by Cadw. Project outputs included three reports, an Environment Statement (edp6367_r028), an Archaeology and Heritage Baseline Assessment (edp6367_r002) and the aforementioned Heritage Impact Assessment (edp6367_r017).

- 1.9 Between 2017 and 2023, I was involved in a long running project at Merthyr Tydfil for a substantial new leisure development, which culminated in a planning submission earlier this year - Rhydycar West, Merthyr Tydfil (P/23/0065). This project considered proposed new development in close proximity to eight scheduled monuments as well as listed buildings and, more widely, historic assets located within the Merthyr Tydfil Registered Landscape of Outstanding Historic Interest. The assessment included assessing direct and indirect (setting) effects including beneficial effects from proposed conservation and interpretation works. Project outputs included the Heads of Terms for a Conservation Management Plan (edp2324_r007), an Environment Statement Chapter (edp2324_r006), an Archaeology and Heritage Baseline Assessment (edp2324_r002) and an ASIDHOL Assessment (edp2324_r004).
- 1.10 Between November 2020 and August 2023, I worked on another long running project in relation to the residential redevelopment of a site in Gloucester – Land at Snow Capel Farm, Matson, Gloucester (22/00519/FUL). The site has a scheduled monument located within it and a key aspect of the assessment was in understanding how the monument's setting would change and what the implication would be for its significance. The project involved protracted consultation with the City Archaeologist and Historic England in this regard, and a resolution to grant planning permission was achieved at Committee in August 2023. Project outputs included a Heritage Management Plan (edp3746_r011), a Heritage Addendum (edp3746_r012), an Environment Statement Chapter (edp3746_r010) and an Archaeology and Heritage Assessment (edp3746_r005).
- 1.11 Between April 2022 and June 2023, I carried out an assessment for a solar farm – Pen Onn Solar Farm, Vale of Glamorgan (DNS/3273713), a Welsh Development of National Significance. This project involved a detailed setting assessment, with the site in relatively close proximity to several scheduled monuments, two conservation areas, numerous listed buildings (including Grade I and II* buildings) and the Llancarfan Landscape of Outstanding Historic Interest. Project outputs included an Archaeological Assessment (edp6825_r004), an Environment Statement Chapter (edp6825_r007) and an Archaeology and Heritage Baseline Assessment (edp4946_r003).
- 1.12 In March 2023 I worked on an application for residential development in Worcestershire, Conderton Close, Conderton (W/23/00751/FUL). The site is located partly within a conservation area and is adjacent to several listed buildings. As such, assessing the potential change to the settings of these assets, and thus the effect on their significance, was a key task. Project outputs included a Heritage Impact Assessment (edp7310_r009) and a Heritage Baseline Assessment (edp7310_r004).
- 1.13 In May 2023 I produced a detailed setting assessment in relation to a proposed residential development site in Monmouthshire (South Wales) - Land North of Monmouth Road, Raglan (DM/2023/01019). Here, I wrote a Heritage Assessment (edp8120_r001) focussed on understanding the potential for impacts upon the setting of Raglan Castle which is a Grade I listed building, scheduled monument and registered park and garden and within a conservation area. The report considered the asset's significance, the contribution made by its setting and the potential for development impacts in great detail. It was well received by Cadw.

- 1.14 Below is a selection of examples of smaller projects which have also involved consideration of change within the settings of heritage assets, such that might result in an effect on their significance.
- 1.15 In March 2023 I worked on a residential development in North Somerset - Land at Rectory Farm (North), Yatton (23/P/0664/OUT) that involved assessing the settings of several listed building.
- 1.16 Also in March 2023, I assessed the potential for setting changes to numerous listed buildings and a conservation area for a solar development in Surrey - Slyfield Farm, Cobham, which is not yet submitted.
- 1.17 In November 2022 I worked on another solar project assessing the potential for change to the settings of several listed buildings and a registered park and garden in North Somerset - Haberfield Park Farm, Abbots Leigh.
- 1.18 In December 2022 I carried out a Heritage Impact Assessment (edp7899_r001) in relation to the residential redevelopment of a school in Abergavenny - Land at Tudor Street, Abergavenny. This project involved assessing the potential for impacts from the development on several listed buildings in its vicinity as well as the Abergavenny Conservation Area.
- 1.19 In March 2022 I worked on a proposed holiday park development at a former Ministry of Defence (MOD) base in Cornwall – Former Penhale Camp, Hoblyn’s Cove, Holywell Bay (PA22/02794), resulting in the preparation of an Archaeology and Heritage Assessment (edp1646_r005). This involved assessing several scheduled monuments and listed buildings.
- 1.20 In October 2021 I worked on a residential development project in Shropshire- Land at Tasley, Bridgnorth (21/05023/OUT), which involved the assessment of setting effects on several listed buildings and a conservation area.
- 1.21 Also in October 2021, I worked on a solar development in South Wales - Rhiwfelin Fawr Farm, Heol Pant-y-Brad, Llantrisant, Pontyclun, which involved the assessment of change to the setting of numerous listed buildings and a conservation area.
- 1.22 Finally, I confirm that this Proof of Evidence on heritage matters is true, and the opinions expressed are my true and professional opinions.

Section 2

Appointment and Scope of Evidence

- 2.1 This second section of my Proof of Evidence will detail my involvement with the appeal site and the development proposals forming the appeal's focus.
- 2.2 It will then outline the response of the Council to the evaluation and determination of the planning application in terms of the proposal's effect on the heritage assets identified as being affected by its implementation.

MY APPOINTMENT AND INVOLVEMENT IN THE PROJECT

- 2.3 I was initially instructed in January 2020 by Bloor Homes Limited to prepare an Archaeological and Heritage Baseline Assessment (edp6190_r003) for a 38-hectare (ha) site that encompassed the present appeal site. I first visited the site on 02 March 2020.
- 2.4 The purpose of this exercise was to identify relevant archaeological and heritage issues so that potential impacts could be avoided, or at least minimised, through the design process.
- 2.5 The project was subsequently delayed due to the Covid 19 pandemic, and I revised the Archaeological and Heritage Baseline Assessment making reference to a new Historic Environment Record (HER) search in February 2021.
- 2.6 The Archaeological and Heritage Baseline Assessment is available as **CD 1.12**. Its conclusions regarding designated heritage assets refer to the wider 38ha site that was assessed at the time rather than the appeal site, although the 38ha site included the appeal site within its boundaries.
- 2.7 With regard to the designated heritage assets that are of relevance to this appeal, and, in accordance with Historic England guidance, *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (HE 2017 Second Edition) (**CD 4.12**), EDP's baseline assessment identified those heritage assets that could potentially be affected by the proposed development of the 38ha site, defined the contribution made to their significance by their setting and assessed whether, in what way(s), and to what extent any part of the wider 38ha site forms a part of their setting contributing to their significance.
- 2.8 EDP's baseline assessment concludes, at paragraph 6.3, that "*the site [the 38ha site] forms a part of the setting of three designated heritage assets*". These comprise:
- The Wickwar Conservation Area;
 - The Grade II* listed building Frith Farmhouse and Bakehouse at South East, Frith Lane (Frith Farmhouse) (**1128768**); and
 - The Grade II listed building South Farmhouse (**1321153**).
- 2.9 In light of this conclusion, from January 2021 I advised the appellant on the design of the development proposals, recommending measures to reduce the impact of development on

the settings of heritage assets, such as planting on the northern edge of the appeal site in order to screen or filter views from the Wickwar Conservation Area, and avoiding the siting of development in the immediate setting of South Farmhouse.

- 2.10 To support the submission of the initial outline planning application i prepared a Heritage Impact Assessment (HIA) (edp6190_r005: **CD 1.13**) which was finalised in December 2021.
- 2.11 In respect of the designated heritage assets that are of relevance to this appeal, this report derived its baseline information from the Archaeological and Heritage Baseline Assessment. It assesses the potential impact on the significance of heritage assets from the development of the appeal site; specifically on the three designated heritage assets identified in the Archaeological and Heritage Baseline Assessment: The Wickwar Conservation Area, the Grade II* listed building Frith Farmhouse and Bakehouse at South East, Frith Lane (Frith Farmhouse; **1128768**) and the Grade II listed building South Farmhouse (**1321153**). The identification and assessment of potential impacts took account of the mitigation proposals imbedded into the design.
- 2.12 EDP's HIA (submitted with the outline planning application) is available at **CD 1.13**. Its conclusions regarding the nature and magnitude of impacts upon the three designated heritage assets are summarised here:
- For the Wickwar Conservation Area it is assessed that the development would impart only very limited change to the conservation area's wider setting and that its character and appearance would be preserved (i.e. there would be no harm);
 - For Firth Farmhouse it concludes that, whilst the appeal site forms part of the asset's wider setting, the land within its boundaries makes no contribution to the significance of the listed building and its development would have no impact upon it; and
 - For South Farmhouse it concludes that the implementation of the appeal proposals would change this asset's setting to a small extent and generate a very minor degree of less-than-substantial harm to the significance of the Grade II listed building.
- 2.13 The outline planning application was submitted to the Council on 23 February 2022 and then validated by the Council on 21 March 2022. A response to the initial submission, in terms of the identification and assessment of heritage impacts, was received from the Council on 31 March 2022 in the form of a Memorandum written by Rob Nicholson, their Conservation Officer (CO).
- 2.14 This response (available as **CD 3.35**) identifies varying degrees of "*less than substantial harm*" to the three designated heritage assets described above. It does not identify any other heritage assets (either designated or non-designated) as being affected by the implementation of the development proposals.
- 2.15 On 24 June 2022 I revisited the appeal site and surrounding areas, principally to re-examine the setting of Frith Farmhouse following receipt of the CO's response to the outline planning application.

- 2.16 On 29 June 2022 I attended a meeting with the Design West panel and other members of the project team which also included a site visit. At that meeting the appeal proposal's heritage response was discussed with comment from Lucy Barron who was at that time a Heritage Consultant with Donald Insall Associates.
- 2.17 In addition to providing advice on the development's architecture and design, the Design West panel also made the following comments on heritage matters in a letter summarising the meeting (dated 19 July 2022; **CD 3.3**):
- "The impact assessments were reported and discussed, and the conclusions generally agreed with. The Panel welcome the early heritage assessments and the consideration of the setting of the heritage assets in developing the proposals. The Panel supports the approach taken."*
- 2.18 The Panel's letter also adds that: *"It was felt that the mitigation measures proposed for any potential harm to the setting of the two farmhouses was appropriate, but that it was important that this is taken through into detailed design proposals, considering the impact of items such as signage and lighting"*.
- 2.19 To support the submission of the revised development proposals I prepared a Heritage Addendum (edp6190_r008) which was finalised in February 2023 and included a rebuttal to the CO's 31 March 2022 consultation response. This report is available as **CD 2.9**.
- 2.20 The Heritage Addendum assessed that the revised proposals retained all of the elements that served to mitigate or reduce impacts upon the settings of heritage assets. As such, the conclusions of the Heritage Addendum in respect of the impacts of development upon designated heritage assets were the same as set out in EDP's earlier HIA.
- 2.21 A response was received to the revised development proposals from the Council's CO in a Memorandum dated 07 March 2023.
- 2.22 The CO's response is available at **CD 3.4**. In respect of the Wickwar Conservation Area, in summary, the CO states that: *"The key issue in understanding or assessing the harm is the separation distances involved, the character of Sodbury Road in the immediate context and the fact that, at least for now, there will remain a visual buffer between the southern edge of the conservation area and the application site"*. The CO goes on to state that: *"I would ultimately agree with the HA in that the development proposals would not cause harm to the character or appearance of the Wickwar Conservation Area due to the distances involved between the application site and the historic core of the village. To perhaps describe the potential impact of the development proposals in another way, we are in something of a "setting" of "setting" situation here and so in my view any objection on the grounds of loss of setting to the conservation area would be difficult to sustain"*. This response is quoted in full in **Section 4** below.
- 2.23 This position accords with that of the appellant, i.e. that there would be no harm to the character or appearance of the Wickwar Conservation Area as a result of the appeal proposals' approval and implementation.

- 2.24 The CO also re-states their view that the appeal proposals would cause a degree of less than substantial harm to the significance of the Grade II* listed Frith Farmhouse. This is because the CO identifies a change to the listed building's wider setting whereby the appeal proposals would *"encroach into its setting"* and result in *"a change in how the setting is perceived from Frith Farmhouse."*
- 2.25 The CO states that *"while the change in setting would potentially be very limited, it would still be harmful"*, thereafter concluding that the only outstanding matter of disagreement with the appellant would be *"the very limited harm that would be caused to the significance of the Grade II* listed Frith Farm, which would be towards the lower end of the spectrum of the "less than substantial" harm category."*
- 2.26 Regarding the Grade II listed South Farmhouse, the CO agrees with the appellant's conclusion in stating that they *"would agree with the HA that the development proposals would result in less than substantial harm to the significance of the Grade II South Farm and would concur that the harm would also be limited as suggested, i.e., towards to the lower end of the spectrum."* This agreement is reflected in the Heritage Statement of Common Ground (SoCG, **CD 7.9**), whereby this matter is agreed between the appellant and the Council.
- 2.27 The appellant submitted an appeal to the Planning Inspectorate (PINS) on the grounds of the Council's non-determination of the application in June 2023.
- 2.28 Following the submission of the appeal, on 03 August 2023 South Gloucestershire Council's Strategic Sites Delivery Committee considered the Outline proposals. A Committee Report (**CD 4.9**) advised the Committee on the Council's position if they were able to determine the application. In the Report's conclusions, at paragraph 6.3, the Report concludes that *"on balance, the adverse impacts of the development would not significantly and demonstrably outweigh the benefits and the application should be granted subject to a legal agreement and conditions"*.
- 2.29 The Report to the Council's Strategic Sites Delivery Committee also includes a discussion of the heritage balance and this is set out below.
- 2.30 In summary, the Case Officer considered the heritage harm to include both the impacts to Frith Farmhouse and South Farmhouse, as assessed by the CO. The Case Officer's assessment of the heritage balance concluded that:
- "Great weight needs to be given to the harm caused to the setting of the listed buildings albeit the harm is limited. It is considered that when this harm is balanced against the benefits of the scheme as required under paragraph 202 of the NPPF the benefits outweigh the harm to both South Farm and Frith Farm. Therefore, the harm to heritage does not on its own provide a clear reason for refusing permission."*
- 2.31 The Council's Strategic Sites Delivery Committee resolved on 03 August 2023 that, should Members have been able to determine the application, the application would have been refused. The application was then presented to the Spatial Planning Committee for review. This was undertaken on 08 August 2023, where Members resolved that, should Members have been able to determine the application, the application would have been refused.

2.32 Notwithstanding the Case Officer's clear advice to the two Committees on the heritage balance, Reason for Refusal (RfR) 1 of the Council's two reasons for refusing Outline Planning Application P22/01300/O (in its Statement of Case: **CD 7.2**) identifies the following:

"1) The adverse impacts of the proposal with regard to:

- Less than substantial harm to South Farm - great weight*
- Less than substantial harm to Frith Farm - great weight*
- Less than substantial harm to Wickwar Conservation Area - great weight,*
- Increase reliance on car borne transport - substantial weight,*
- Landscape Harm - significant weight*
- Conflict with Spatial Strategy -limited weight*
- Loss of Grade 3 agricultural land - limited weight*
- Recreational pressure on SSSI - limited weight*

significantly and demonstrably outweigh the benefits of the proposal, which are:

- Provision of housing - significant weight,*
- Affordable housing - significant weight,*
- Provision of self-build plots - significant weight,*
- Provision of new jobs - limited weight,*
- Other benefits (potential for a shop, redirected Public Right of Way, highway improvements and connections) - limited weight*
- and therefore, applying paragraph 11(d)(ii) of the NPPF, permission should be refused."*

2.33 In light of the Council's decision to progress with a heritage RfR of the outline planning application, I was appointed by the appellant to represent them and inform the Public Inquiry in respect of heritage matters on 30 August 2023.

2.34 To inform and support the preparation of my evidence, I made additional visits to the appeal site and its wider surroundings on 08 and 11 September 2023, where the latter included arranging and gaining access to the internal spaces of Frith Farmhouse. I also conducted additional background archive research in support of my assessment, which is included in **Section 4** of my Proof of Evidence.

- 2.35 Notwithstanding the Council's putative RfR, following agreement of a Heritage SoCG (**CD 7.9**) it is now agreed between the parties that there would be no harm to the special architectural or historic interest of the Wickwar Conservation Area from the implementation of the appeal proposals.
- 2.36 Nevertheless, in order to provide a full explanation of the appellant's position regarding the three designated heritage assets, as referenced in the Council's Statement of Case (**CD 7.2**), **Section 4** below presents a comprehensive assessment in relation to the conservation area.

Section 3

Legislation, Planning Policy and Guidance

- 3.1 The following section summarises the key legislation and national/local planning policies and guidance which are of relevance to this Proof of Evidence.

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

- 3.2 Sections 66(1) and 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* set out the duties of Local Planning Authorities in respect of the treatment of listed buildings and conservation areas through the planning process.

- 3.3 Section 66(1) of the 1990 Act sets out the statutory duty of the decision-maker where proposed development would affect a listed building or its setting. It sets out the statutory duty as follows:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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.”

- 3.4 This “special regard” duty has been tested in the Court of Appeal and confirmed to require that “considerable importance and weight” should be afforded by the decision maker to the desirability of preserving a listed building along with its setting. The relevant Court judgement is referenced as *Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage and National Trust* [2014] EWCA Civ 137.

- 3.5 However, whilst it is the case that “special regard” must be had, it must also be recognised that Section 66(1) of the 1990 Act does not identify that the local authority or the Secretary of State must preserve a listed building or its setting. If a proposed development does not “preserve” “the building or its setting or any features of special architectural or historic interest” and thus the “special regard” duty is enacted it should not automatically dictate that the proposals are unacceptable and should be refused.

- 3.6 Expressed in relation to setting, the discussion of “harm” is of relevance in the judgement in respect of *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin) which also makes this clear at paragraph 49 when it states that:

“This does not mean that an authority's assessment of likely harm to the setting of a listed building or to [the character or appearance of] a conservation area is other than a matter for its own planning judgement. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasised in Barnwell, that a finding of harm to the setting of a listed building or to [the character or appearance] of a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory

one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering."

- 3.7 This key point is also made in paragraph 54 of *Forest of Dean DC v Secretary of State for Communities and Local Government* [2013] EWHC 4052, i.e.:

"Section 66(1) did not oblige the inspector to reject the proposal because he found it would cause some harm to the setting of the listed buildings. The duty is directed to 'the desirability of preserving' the setting of listed buildings. One sees there the basic purpose of the 'special regard' duty. It does not rule out acceptable change. It gives the decision-maker an extra task to perform, which is to judge whether the change proposed is acceptable. But it does not prescribe the outcome. It does not dictate the refusal of planning permission if the proposed development is found likely to alter or even to harm the setting of a listed building."

- 3.8 In other words, it is up to the decision maker (such as the local authority) to assess whether the proposal that is before them would result in 'acceptable change'.
- 3.9 Section 69 of the Act advises local authorities to define as conservation areas any "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance".
- 3.10 Section 72(1) gives local authorities a general duty to pay 'special attention' "to the desirability of preserving or enhancing the character or appearance of that area".
- 3.11 It must be recognised that, as established by the Courts (*South Lakeland DC v Secretary of State for the Environment*, (1992) 2 WLR 204): (1) there is no statutory duty to enhance the character or appearance of a conservation area - the Courts have confirmed that development that "preserves" them is acceptable; and (2) the statutory duty only covers development that is within a conservation area - the 'setting' of a conservation area is addressed by planning policy.
- 3.12 Paragraph 200 of the National Planning Policy Framework (Department for Levelling Up, Housing and Communities (DLUHC), 2023) transposes Sections 66(1) and 72(1) of the 1990 Act into national planning policy. The balancing exercise to be performed, between the harm arising from a proposal and the benefits which would accrue from its implementation, is then subsequently presented in paragraphs 201 and 202.

NATIONAL PLANNING POLICY

- 3.13 The National Planning Policy Framework (NPPF) was updated on 05 September 2023. Section 16 sets out the government's approach to the conservation and management of the historic environment through the planning process.

3.14 Paragraph 189 recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

3.15 Paragraph 194 concerns planning applications, stating that:

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

3.16 NPPF paragraph 197 is relevant when it 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.”*

3.17 Paragraph 199 considers the weighting given within the planning decision with regard to impacts on designated heritage assets, stating that:

“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.”

3.18 Paragraph 200 considers the level of harmful effects on designated heritage assets and states that:

“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:

- a. Grade II listed buildings, or grade II registered parks or gardens, should be exceptional; and*

- 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 exceptional."*

3.19 With regard to the decision-making process, paragraphs 201 and 202 are of relevance. Paragraph 201 states that:

"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;*
- b. No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- 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."*

3.20 Paragraph 202 states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

3.21 The assessment of harm, including the definition of 'substantial harm', is explained in the Government's Planning Practice Guidance (PPG) (last updated 24 June 2021) under the question *"How can the possibility of harm to a heritage asset be assessed?"* (Paragraph: 018 Reference ID: 18a-018-20190723). The key elements of the guidance are discussed in the subsection on the PPG below.

3.22 A key point is to underline that harm from change within an asset's setting should, unless the asset has a setting that is especially relevant to its significance over and above its actual fabric, only ever be of a relatively low scale. This is because, in line with NPPF, it is only the significance that the asset derives from its setting that is affected, not any of that which is contained in its actual fabric.

3.23 This position has been confirmed by the Secretary of State for Levelling Up, Housing and Communities regarding a planning application at Edith Summerskill House, Clem Atlee Court, London on 04 July 2022 (Reference APP/H5390/V/21/3277137). In their Report, at IR12.50, the Planning Inspector made the statement that:

"In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult

to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.”

- 3.24 This statement was endorsed by the Secretary of State in paragraphs 11 to 15 of the Decision Letter (Reference APP/H5390/V/21/3277137 – 04 July 2022), where they agreed with the Planning Inspector’s reasoning and applied it to the assets in question.

- 3.25 Paragraph 206 of the NPPF sets out that:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

- 3.26 In relation to conservation areas, paragraph 207 of the NPPF sets out that:

“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.”

- 3.27 This clearly identifies that any adverse impacts should be judged against the whole of the conservation area.

- 3.28 In the Glossary of the NPPF (Annex 2), the following key terms are defined:

“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.

Significance (for heritage policy)

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”

PLANNING PRACTICE GUIDANCE

- 3.29 The Government's PPG (last updated 24 June 2021) provides guidance and definitions in relation to the use of the NPPF, including a section on the Historic Environment. Those that are of relevance to the assessment presented in this Proof of Evidence are set out below.
- 3.30 The PPG adds additional detail on the types of heritage interest that comprise significance as set out in Annex 2 of the NPPF Glossary (paragraph: 006 Reference ID: 18a-006-20190723).
- 3.31 Under the heading *"What assessment of the impact of proposals on the significance of affected heritage assets should be included in an application?"* (paragraph: 009 Reference ID: 18a-009-20190723), the PPG states that:
- "...applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance."*
- 3.32 The Government's PPG also provides further clarification in terms of the identification of harm (Paragraph: 018 Reference ID: 18a-018-20190723). It reiterates that *"What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset"*. It also states that *"Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset."*
- 3.33 The PPG goes on to state that potential harm needs to be categorised as either less than substantial harm or substantial harm and that *"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated"*.
- 3.34 It identifies that harm to the significance of heritage assets can arise through physical changes or change within their settings. With regard to the scale of harm, it identifies that *"Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework"* but that substantial harm is a *"high test, so it may not arise in many cases"* and that *"an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest"*.
- 3.35 It iterates that *"It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed"*.

LOCAL PLANNING POLICY

- 3.36 The current planning policy for South Gloucestershire comprises the South Gloucestershire Core Strategy which was adopted in December 2013 and is the principal planning policy document for South Gloucestershire Council. It provides the development strategy to deliver sustainable growth to the year 2027.

3.37 Policies CS1 and CS9 of the adopted South Gloucestershire Core Strategy relate to heritage matters.

3.38 Policy CS1 refers to the provision of high-quality design; the following refers to heritage considerations: “...3. Existing features of landscape, nature conservation, heritage or amenity value and public rights of way, are safeguarded and enhanced through incorporation into development...”.

3.39 With regard to Policy CS9 - Managing the Environment and Heritage, only the first bullet point of this policy relates to heritage matters. It states that:

“The natural and historic environment is a finite and irreplaceable resource. In order to protect and manage South Gloucestershire's environment and its resources in a sustainable way, new development will be expected to:

- 1. Ensure that heritage assets are conserved, respected and enhanced in a manner appropriate to their significance.”*

3.40 The Policies Sites and Places Plan which forms part of the South Gloucestershire Development Plan was adopted in November 2017. Policy PSP17 relates to Heritage Assets and the Historic Environment. The parts that are relevant to this Proof of Evidence on heritage matters state that:

“Conserving and Enhancing

Development proposals should serve to protect, and where appropriate, enhance or better reveal the significance of heritage assets and their settings. They should be conserved in a manner that is appropriate to their significance.

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.*

Conservation Areas: *Development within or affecting the setting of a conservation area will be expected to:*

- Preserve or, where appropriate, enhance those elements which contribute to their special character or appearance; and*
- Pay particular attention to opportunities to enhance negative parts of conservation areas and to draw on local character and distinctiveness.*

Proposals should demonstrate that:

- *Size, form, position, scale, materials, design, colour and detailing have proper regard to the distinctive character and appearance of the conservation area;*
- *Buildings, groups of buildings, historic street and plot patterns, open spaces, building lines, views, vistas, ground surfaces, boundary walls and other architectural or hard landscape features, which contribute to the character or appearance of the conservation area are retained; and*
- *Other natural features, which contribute to the character or appearance of the conservation area, will be retained and protected. The Council will seek to retain buildings and structures which contribute positively to a conservation area. The loss of any building that is important or integral to the character or appearance of the conservation area is likely to amount to substantial harm.*

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, and/or 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 does not conserve or enhance 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 be refused, unless 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;*
- *There is no other means of delivering similar public benefits through development of an alternative site;*
- *There is no other alternative proposal, or a similar proposal, which achieves similar public benefits, but with less harm to the heritage asset;*
- *The harm to the heritage asset is minimised and mitigated through the form 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."

CONCLUSION

- 3.41 This section identifies the key points of legislation and policy that should be considered in respect of the assessment presented in this Proof of Evidence.
- 3.42 Regarding the assessment of impacts upon the two listed buildings, consideration should be given to Section 66(1) of the 1990 Act whereby "*special regard*" should be given to the "*desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*"
- 3.43 Any harm should be afforded "*considerable importance and weight*" but, in accordance with previous judgements, should not preclude the granting of planning permission.
- 3.44 Regarding the assessment of impact upon the conservation area, Section 72(1) of the 1990 Act does not apply as effects on the 'setting' of a conservation area are addressed by planning policy.
- 3.45 Both the listed buildings and the conservation area are considered under the NPPF. Paragraph 194 requires that the significance of the assets is described as well as any contribution made by their settings.
- 3.46 The concepts of 'significance' and 'setting' are defined in Annex 2 of the NPPF and in greater detail in the accompanying PPG.
- 3.47 In determining the appeal, consideration needs to be given to the statements in paragraph 197 with paragraph 199 considering the weighting related to impacts upon designated heritage assets.
- 3.48 Paragraph 200 states that "*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*".
- 3.49 Paragraphs 201 and 202 define the nature of the decision-making process with regards to "*substantial harm*" and "*less-than-substantial harm*".
- 3.50 Given that no "*substantial harm*" is assessed to the relevant assets by any parties, the key paragraph is 202, which states that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

- 3.51 Any impacts to the heritage assets should also be considered with reference to the South Gloucestershire Core Strategy and the Policies Sites and Places Plan which forms part of the South Gloucestershire Development Plan.
- 3.52 However, regarding the heritage policy requirements of both Policy CS9 and PSP17, both policies conflict with the NPPF as concluded in the recent Thornbury decision (**CD 5.1**). This point and the implications for weighting in the planning balance are discussed in greater detail in Section 7 of the Proof of Evidence - Planning.

Section 4 Assessment

- 4.1 This section of my Proof of Evidence identifies and then assesses the nature and magnitude of impacts to the significance of the heritage assets which are identified by South Gloucestershire Council in its Statement of Case.
- 4.2 In line with the wording of the putative RfR and the Inspector's identified main issue (a), the following assessment of effects will discuss the main heritage issues in terms of the potential for effects on the Wickwar Conservation Area, the Grade II* listed Frith Farmhouse (**1128768**) and the Grade II listed South Farmhouse (**1321153**). In that regard **Proof Plan RS 1** illustrates the locations of these heritage assets in relation to the appeal site.
- 4.3 As agreed in the Heritage SoCG (**CD 7.9**), the implementation of the appeal proposals would not result in any change within the setting of any other heritage assets.

SETTING ASSESSMENT METHODOLOGY

- 4.4 Current best practice guidance for the identification and assessment of 'indirect' effects on heritage assets is set out in Historic England (2017) *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*, which is known and referenced as GPA3 (**CD 4.12**).
- 4.5 When assessing the 'indirect' impact of proposals on heritage assets, i.e. such as those beyond the boundary of a development site, it is not a question of whether there would be a direct physical impact on that asset, but instead whether change within its wider 'setting' would then lead to damage to or a loss of the asset's 'significance'.
- 4.6 The identification of change within a heritage asset's setting must not be confused with harm to that asset. Instead, the question that should be asked is whether the change would result in a loss of (or damage to) its significance as a heritage asset.
- 4.7 The significance of heritage assets is defined in Annex 2 of the NPPF whereby it is defined as "*The value of a heritage asset to this and future generations because of its heritage interest*" and that "*The interest may be archaeological, architectural, artistic or historic*". Significance can also be derived from a heritage asset's setting. In this regard, an asset's significance is the totality of the contributions made by its physical form and fabric and its setting. This is a point of agreement in the SoCG (**CD 7.9**).
- 4.8 It is first necessary to understand the significance of the asset in question (and any contribution made to that significance by its setting), in order to establish whether there would be any loss or damage to that significance, and therefore harm caused as a result of the proposal being implemented.

- 4.9 The Historic England guidance (**CD 4.12**) is clear in stating that change within a heritage asset's setting need not necessarily be harmful; the implementation of development proposals within a heritage asset's setting can be positive, negative or neutral.
- 4.10 The guidance (**CD 4.12**) presents an approach to setting and development management based around a five-step procedure:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 5. Make and document the decision and monitor outcomes.
- 4.11 The application of this methodology is found in the Archaeological and Heritage Baseline Assessment (edp6190_r003), HIA (edp6190_r005) and Heritage Addendum (edp6190_r008) which were prepared for the applicant (now appellant) by EDP and submitted with the outline planning application.

WICKWAR CONSERVATION AREA

- 4.12 The appeal site is not within the conservation area, rather it is located c.330m to the south of its boundary. As such, the proposed development of the appeal site could only affect the conservation area's wider setting.
- 4.13 In accordance with Step 2 of the Historic England Guidance (**CD 4.12**), it is necessary to assess the degree to which the setting of the conservation area makes a contribution to its significance or allows that significance to be appreciated.

The Significance of the Wickwar Conservation Area

- 4.14 The majority of the conservation area's significance (or special interest) is bound up in the buildings, streets and spaces within the designated area and therefore the asset's setting only makes up a small or minority portion of the conservation area's total special interest.
- 4.15 The significance (or special interest) of the Wickwar Conservation Area is described in the Archaeological and Heritage Baseline Assessment (**CD 1.12**) and is also discussed here.
- 4.16 The conservation area was re-visited on 08 September 2023 as part of the preparation of this Proof of Evidence. Photographs from that visit are at **Appendix EDP 1** and **Proof Plan RS 2** illustrates the conservation area, showing the character areas and photograph locations.

4.17 A Character Appraisal was prepared by the Council and adopted as Supplementary Planning Guidance in 1998. This is included in the Core Documents as **CD 4.14**. This document is now c.25 years old, and thus pre-dates current national and local planning policy. However, although development has occurred since its adoption along Sodbury Road to the south of the conservation area, the area itself has changed little over that period. As such, the description that it provides of the conservation area is still valid.

4.18 The Character Appraisal describes the ‘special architectural and historical interest’ of the Wickwar Conservation Area (which it calls Special Character):

“The special character of Wickwar derives from its medieval origins in the 13th century as a planned settlement.”

4.19 It explains that it is one of four medieval South Gloucestershire towns and that it *“still displays the characteristics and layout typical of such medieval settlements”*.

4.20 In this regard it describes how the medieval village developed a linear character along a trade route, with a wide main street (High Street) as a marketplace with continuous rows of houses either side, each with a long burgage plot to the rear. The older part of the settlement is at the north end where the Church of Holy Trinity stands adjacent to the location of the original Anglo-Saxon settlement.

4.21 The Council’s Character Appraisal also states that:

“Today, despite some modern development mainly on the village edges, the medieval layout and historic character of the former market town remains reasonably intact and is an important part of our heritage.”

4.22 It defines the following as being ‘important features’ of the conservation area:

- *“Historic buildings - there is a wealth of traditional buildings (including 67 listed buildings and structures) which contribute to the period character;*
- *Historic layout and plan form of the settlement - including the narrow burgage plots, boundary walls and back lanes;*
- *Trees - the mature trees in the north and west of the conservation area contribute to the attractive character;*
- *Stone boundary walls - are important features providing enclosure and permanence;*
- *Building materials - a mix of stone and render;*
- *Archaeology - there are numerous sites on the Sites and Monument Record reflecting the importance of the village; and*
- *Views - in and out of the area are important.”*

4.23 An assessment of the special interest (or significance) of the conservation area today draws similar conclusions to the 1998 Character Appraisal.

- 4.24 It is still possible to appreciate the historic evolution of the village and thus it is evident that its plan form and layout comprise key aspects of its special historical interest. The village saw a medieval settlement shift, whereby the Anglo-Saxon settlement around the church was abandoned following the establishment of a market to the south by the Norman De la Warre family. This can still be appreciated in the contemporary landscape, whereby earthworks related to the buried remains of the Anglo-Saxon settlement and walls of the former manor house at Pool House can be seen in the fields to the south of the Church (**Image RS 5**).
- 4.25 The High Street is lined by historic buildings, many of which are listed and there is very little modern development in the streetscape along High Street (i.e. **Images RS 1** and **4**). As such, it is easily appreciated that the street was the village's historic core. This appreciation extends to the back lanes to the east and west where, although lined by modern houses, the historic layout of lanes to the rear of the village's burgage plots can be seen (**Image RS 3**) and appreciated.
- 4.26 The evolution of the village can be seen in the historic evolution plan at **Proof Plan RS 6** and the selection of historic maps at **Proof Plan RS 7**. The Tithe map of 1838 and Ordnance Survey map of 1880-82 together illustrate how, in the 19th century, the settlement comprised only the parts of the village that evolved from its medieval layout; the scattered settlement in the northern area around the church and the dense rows of houses and burgage plots lining the broad High Street.
- 4.27 It is not until the 1960s that more substantial modern residential development occurred at Wickwar, with housing and industrial development shown on the western edge of the village, and housing to the east of the village on the 1967-8 Ordnance Survey map. The Ordnance Survey map of 1999 shows extensive modern housing to the east of the conservation area as having been built by the late 1990s.
- 4.28 It is apparent that, even following 20th century housing development immediately adjacent to the village's historic core, the core areas have managed to retain their layout and character so as to continue to illustrate the history of the village, a point that is made in the Character Appraisal:
- "Today, despite some modern development mainly on the village edges, the medieval layout and historic character of the former market town remains reasonably intact and is an important part of our heritage."*
- 4.29 The conservation area contains 58 listed buildings, with one designated at Grade II* and 57 designated at Grade II. These are almost all located either along High Street or around the church to the north, with only a single listed building, Hill House, located outside of the historic core of the village. The distribution of these buildings can be seen on **Proof Plan RS 1**.
- 4.30 It is evident that the majority of the special interest (or significance) of the conservation area relates to:
- The preserved layout of the village's historic core which relates to the medieval evolution of the settlement, notably the area around the church which relates to the

village's origins, and the High Street, which is distinctive as the central spine of the medieval village and location of its market place; and

- The village's historic buildings which contain its architectural interest, and which form two key groups: the continuous frontages along High Street which contribute greatly to the character of the street and help define its historical origins as a medieval market and the area around the church where the key historic buildings and structures reflect the long history of this area.

4.31 Other elements which contribute to its special interest or significance of the Wickwar Conservation Area include the following:

- Its archaeological interest, particularly in terms of the deposits related to its Anglo-Saxon history and former manor near the church;
- The mature trees, which particularly add character to the more open and greener northern part of the conservation area;
- The use of local stone – not only in the architecture of the vernacular buildings, particularly those which line High Street, but also in the stone walls which generally mark boundaries around the village; and
- Important views, which are discussed in the section below.

The Conservation Area's Character Areas and its Important Views

4.32 In order to better understand the special interest of the conservation area, the Council's adopted Character Appraisal defines four character areas:

- The High Street;
- The Back Lanes (Back Lane and The Buthay);
- The area to the north around the church; and
- The land to the west of the settlement.

4.33 EDP's Archaeological and Heritage Baseline Assessment (**CD 1.12**) defines three parts to the conservation area, where the Back Lanes and High Street are considered together in view of the fact that they are adjacent to each other and characterised by a historic street layout enclosed with buildings.

4.34 As noted above, the wide, central north-south axis of the High Street developed in the 13th century as a space for markets. The buildings on High Street are a key aspect of the conservation area's special interest, dating from the 15th – 18th centuries. Most are listed and they form an almost continuous frontage (**Image RS 1**) with narrow front elevations and long burgage plots to the rear.

4.35 Views out from High Street are restricted. In that regard, the Council's Appraisal describes how individual buildings at the north and south ends of the street act as pinch points,

enclosing the space (e.g. **Image RS 4**). The only view illustrated in the Character Appraisal is out to the east, although presumably views up and down the street, from where the buildings are best appreciated, are also of importance.

- 4.36 The Back Lanes are located to the east and west of the High Street. These have a strong sense of enclosure due to adjacent houses and stone walls which define the rear plots of buildings on High Street (**Image RS 3**).
- 4.37 The northern part of the conservation area has a more open character, comprising, as described in the Appraisal, isolated buildings set within an attractive, undulating landscape of green fields with tree clumps and stone boundary walls (**Images RS 5 and 6**). A key feature is the Grade II* listed Church of the Holy Trinity that is located at the top of a low hilltop at the northern end of the village. This area also contains important archaeological features related to the village's early medieval origins and, from the vantage point around the church, provides views out to the wider agricultural land to the north (**Image RS 7**).
- 4.38 The land to the west of the settlement comprises agricultural fields and the Arnold's Field light industrial estate and it is crossed by two east-west Public Rights of Way (PROWs) as shown in **Images RS 9 and 10**. The agricultural land dips down but then rises to adjoin playing fields and further agricultural land to the west.
- 4.39 As stated in the Council's Character Appraisal, the western part of the Wickwar Conservation Area is included in the designation not because it contains elements of special interest but to "*protect the village setting and views*".
- 4.40 By virtue of being open and undeveloped, these fields allow for views eastwards towards the village, of the medieval core and the backs of the buildings on High Street with their jumble of rear extensions, outbuildings and interesting roofscape. These inward-looking important views (**Image RS 9**) are highlighted on a plan at page 8 of the Appraisal (**CD 4.14**). It is noteworthy that, whilst the views do look towards the rear of the historic buildings on High Street, they also take in the rear of houses of the 1960s that lie on the western edge of the village and (further north) light industrial buildings. As such, they only provide a limited experience of the village's historic character and appearance, certainly far less than for views along High Street for example, which are enclosed by historic buildings.

The Setting of the Conservation Area and its Contribution to its Character and Appearance

- 4.41 To the south, west and north of the conservation area is agricultural farmland. To the east and south-east is modern (20th and 21st century) housing. The adjacent farmland reflects the village's historic origins, as set out in the Council's adopted Appraisal, as representing a small, linear settlement in a "*rural setting*".
- 4.42 The extent of the surrounding farmland is demonstrated clearly on **Proof Plan RS 6**. The farmland setting of the conservation area is only experienced from the High Street in views south-west from the very southern end of the street (**Image RS 16**) due to the enclosure of the street with houses. Views to the south-west are also possible from the southern end of the Buthay, the back lane on the west side of High Street (**Image RS 8**), with the lane enclosed by houses and walls further north (**Image RS 3**).

- 4.43 The wider farmland to the north and north-west is experienced from the areas around the church (**Images RS 6 and 7**) but views south from this part of the conservation area to the wider countryside are not possible due to rising land and intervening buildings and trees.
- 4.44 As might be expected, the wider farmland to the south, west and south-west is most readily experienced from the agricultural fields which comprise the western part of the conservation area, which itself is included in the designation because it forms a part of the setting of the village from where views towards it are preserved.
- 4.45 From the PROWs that cross this area (**Images RS 10 and 11**), views to the south and south-west are possible that take in a landscape of agricultural fields, as well as modern houses and agricultural buildings located to the south. Such views are not highlighted as representing important views in the Council's adopted Character Appraisal.
- 4.46 The farmland to the north, west and south represents an aspect of the setting of the conservation area that contributes positively to its character and appearance, but only in so much as the village can be experienced in views from and adjacent to a landscape of agricultural fields. This experience is more pronounced nearer to the village than further away and an experience of the village is not possible beyond rising land c.230m to the west and c.450m to the south-west of the conservation area which serves as a viewshed.
- 4.47 Hence, the surrounding agricultural fields to the north, west and south are assessed as making only a minor contribution to the conservation area's significance. Their character as agricultural fields reflects the village's historic setting and, in views to the village, their openness allows for an appreciation of its historic form.
- 4.48 However, the majority of the conservation area's special interest (or significance) is contained in the layout at High Street and around the church and in its historic buildings, as well as other features such as archaeology, trees and stonework. As such, the wider setting of fields to the north, west and south contributes only a small amount to the total significance of the Wickwar Conservation Area.
- 4.49 The modern houses to the east of the conservation area do not possess the historic character of the conservation area, but they are set behind the historic properties which line the roads and given the enclosed character of High Street, they do not impose on areas of historic character and appearance. As such, they are assessed as a neutral element of the conservation area's setting.
- 4.50 This assessment is reflected in the Council's adopted Character Appraisal, where it states that:
- "Today, despite some modern development mainly on the village edges, the medieval layout and historic character of the former market town remains reasonably intact and is an important part of our heritage."*
- 4.51 This statement reflects that fact that, even with 20th century development right against the eastern and western edges of the historic core of the village at High Street, the conservation area's historic layout and character have been preserved to the extent that they are still highly legible and thus significant.

- 4.52 The development to the south of the conservation area along Sodbury Road is best understood with regard to the experience of approaching the conservation area from the south along this road. This aspect of the conservation area's setting has been assessed as part of the research carried out to support the preparation of this Proof of Evidence.
- 4.53 Due to the gentle curve of Sodbury Road, the conservation area and its buildings do not become visible in views northwards up the road until c.150m to the south (**Image RS 14**). Further north (**Images RS 2 and 15**) as the road curves, the non-designated buildings that lie on the southern edge of the conservation area become visible and a clear experience of the historic character of the southern end of High Street is possible.
- 4.54 The approach to the conservation area is characterised by several historic buildings, including the Grade II listed Ivy House (**1137321**) and 19th century, non-designated cottages further north. Also characteristic of the north-bound approach are the stone boundary walls which intermittently line both sides of the carriageway. The built elements lend historic character to the conservation area's setting on Sodbury Road and make a minor positive contribution to its character and appearance.
- 4.55 The approach to the conservation area, just south of its boundary, includes views to the west across fields (**Image RS 16**) whereby the southern edge of the conservation area can be experienced as being set on the edge of an area of agricultural land bounded by hedgerows. This experience is enhanced by the use of stone boundary walls and hedgerows on both sides of the road which accord with the character of the village and its buildings at its southern edge.
- 4.56 The agricultural fields that are visible to the west and south-west, which are part of the experience of entering the conservation area, are assessed as being in keeping with the village's historic "*rural setting*" as defined in the Appraisal.
- 4.57 These elements and the availability of these views are an aspect of the conservation area's setting that makes a minor positive contribution to its character and appearance, relating to its special interest as a historic village defined by stone-built historic buildings set on the edge of its agricultural fields.
- 4.58 On the eastern side of the road are modern houses, but these are set back behind stone walls, hedges and trees and so therefore do not impose into the streetscape and thus appear distinct from the edge of the conservation area. As such, it is assessed that these adjacent houses form a neutral element of the Wickwar Conservation Area's setting.
- 4.59 To the south, where there is no visual experience of the conservation area from Sodbury Road, the road has developed a modernised character with the development of 20th century houses and businesses on both sides, albeit interspersed with historic features such as the Grade II listed building South Farmhouse, several 19th century houses within gardens and various stone boundary walls.
- 4.60 As such, views northwards (**Images RS 12 and 13**) now include modern houses and modern street furniture and landscaping features such as hedgerows.

- 4.61 Development in this part of the village is not experienced with or adjacent to the conservation area and its buildings, and so it has no influence on how its character and appearance are experienced and neither does it make a contribution to it.

The Appeal Site in Relation to the Setting of the Conservation Area

- 4.62 The appeal site is only experienced from the conservation area in views south from the PRowS in the western part of the conservation area (**Image RS 11**). The relevance of the appeal site in these views to the character and appearance of the conservation area is described in the HIA (**CD 1.13**) in paragraphs 3.10 to 3.13.
- 4.63 The appeal site is experienced as part of the general 'rural' landscape of agricultural fields which lies to the south of the village. These views out from the conservation area are not identified in the Character Appraisal as 'important views' and are not attained from a part of the conservation area which possesses any great degree of inherent special interest. As stated above, the farmland from where the views are possible is only included as part of the conservation area as it represents part of its wider setting rather than because it contains any features of intrinsic heritage interest.
- 4.64 It is noteworthy that, since the recent construction of houses to the east of Sodbury Road, the view south now also includes further modern houses in the background behind the appeal site (notable in **Image RS 11**), thus eroding very slightly the degree to which Wickwar is experienced as a historic rural settlement.
- 4.65 As such, it is concluded that, on account of their presence in the southerly view outwards from the western part of the conservation area, the north-western field at the appeal site and the western edge of the field to the south (which is also part of the appeal site) form part of the setting of the Wickwar Conservation Area. In view of the fact that they comprise agricultural fields enclosed and separated by mature hedgerow boundaries, they are assessed as representing parts of the conservation area's wider setting of agricultural land that in its totality contributes to its overall significance to a minor degree.
- 4.66 With that in mind, **Proof Plan RS 6** illustrates clearly how much of the conservation area's wider setting to the north, west and south is occupied by agricultural land and how much of that land is within the appeal site.
- 4.67 Within a 1km buffer of the conservation area there is c.308ha of agricultural land to the north, west and south. Of this, only 7.89ha is within the appeal site boundary and this is located c.330m from the conservation area. Evidently the appeal site comprises only a very small proportion of the wider setting of agricultural land around the conservation area and, even then, it is only visible from a peripheral part of the conservation area included in order to preserve the conservation area's setting. It is not visible from any part of the conservation area containing any features of its special historic or architectural interest.
- 4.68 As such, and on account of its appearance as agricultural farmland, the appeal site is assessed as making an extremely minor contribution to the heritage significance of the Wickwar Conservation Area.

The Appeal Proposals in Relation to the Setting and Significance of the Conservation Area

- 4.69 As shown on the Illustrative Parameter Plan – Green Infrastructure (BLOA3039_36011), the appeal proposals seek to minimise the presence of the proposed development in the view south from the conservation area by incorporating tree planting on the north-western and western boundaries of the appeal site, with development set back from this edge. Also, as shown on the Illustrative Parameter Plan – Building Heights (BLOA3039_36021) only two-storey development is proposed in the northern part of the appeal site and along its western edge.
- 4.70 As assessed in EDP's HIA (**CD 1.13**) at paragraphs 3.14 and 3.15, the planted boundary would, at least partially, screen housing located beyond it once the tree line has matured and hence softened the visual effect of the proposed development. The restricted two-storey height of the proposed residential dwellings would further minimise the presence of new development in this view from the conservation area.
- 4.71 An impression of what the houses would look like in this view (**Image RS 11**) can be attained from Viewpoints 10 and SVP 3 of the Verified Views (Appendix EDP 1 of Mr Gardner's Proof of Evidence). The viewpoints are located on PRoWs in the western part of the conservation area. They clearly illustrate that, whilst the proposed houses would be visible, they would only occupy a small part of the agricultural land present in the views and, as the proposed boundary vegetation matures, would be mostly screened and with only the upper parts of the houses visible.
- 4.72 The assessment concludes that, with these mitigation measures embedded in the design, the appeal proposals would be just visible but would be seen at least partially screened by trees and situated on the eastern side of the appeal site and would be seen adjacent to existing modern agricultural buildings at South Farm and other residential development along Sodbury Road (B4060) including the recently constructed housing beyond. The general character of the view south out of the conservation area would continue to reflect the village's historic, farmland setting of agricultural fields, taking in broad extents of agricultural land to the west and north of the appeal site, which represents an element of its 'rural setting' that is defined in the Council's adopted Character Appraisal.
- 4.73 Furthermore, it needs to be recognised that only 7.89ha of agricultural land from a total resource of c.308ha located within 1km of the conservation area to the north, west and south would be developed by the appeal proposals.
- 4.74 As such, it is concluded that, insofar as the conservation area's wider setting contributes to its special interest (or its heritage significance), this minor contribution would be maintained by the implementation of the appeal proposals in view of the retention of the majority of the agricultural land adjacent to and in its wider vicinity. Hence, there would be no adverse impact and no harm caused as a result.
- 4.75 In this regard, it is worth noting that the housing development at Land South of Poplar Lane (PK16/4006/O), located on the eastern side of Sodbury Road, was assessed by the applicant's consultant as having no impact upon the significance of the Wickwar Conservation Area. The Council's Heritage Consultant, presumably due to the

absence of an in-house CO at the time, nonetheless assessed a degree of less than substantial harm (in a letter of 09 August 2016, **CD 6.10**). It is the case that even with harm identified by the Council's Consultant, planning permission for this development was granted by the Council.

- 4.76 In a letter dated 17 November 2017 (**CD 6.11**), the South Gloucestershire Council's CO commented on the proposed residential housing development at Land South of Horwood Lane (PK17/4552/O). In that letter he states that:

"The application site would be a further expansion of the 20th century urban development south of the historic medieval settlement, the impact of which on the setting of the heritage assets closer to the settlement core has already been considered under PT16/4006/O as being outweighed by the benefit of the new residential development. This further expansion will extend the area of residential housing, but it will not introduce any further harm to those assets already identified as being affected by the PT16/4006/O application."

- 4.77 Evidently, the Land South of Horwood Lane development, located further to the south than Land South of Poplar Lane (PK16/4006/O), was considered by the Council to cause no harm to the significance of the conservation area. However, the Council did consider less than substantial harm from the development at Land South of Poplar Lane in accordance with their CO's opinion, but still judged it to be acceptable. For the appeal site, the Council's CO has also assessed no harm as arising from the proposal, which is described below.

- 4.78 In their response of 07 March 2023 (**CD 3.4**), South Gloucestershire Council's CO (Rob Nicholson) made a statement that agrees with the appellant's assessment set out above. Whilst this is not repeated here in full, the key points are:

- *"Due to the separation distances involved between the application site and the Wickwar Conservation Area, it is difficult to consider how the development would impact on its historic character and appearance."*
- *From visiting the site there is an appreciation of the visual impact of the developments on the eastern side [of Sodbury Road] that have now clearly established a greater suburban context for the village. Therefore, while the development proposals would "enclose" the western side of part of Sodbury Road (a point which the HA [the Heritage Addendum [CD 2.9] disputes), the impact would not be one that could be considered to cause harm to the conservation area.*
- *The successive developments to the south of Wickwar since the 1990s have significantly changed how the approach to the historic village core is now experienced. From visiting the site also, I do not see a case that we are in a "cumulative harm" situation. The key issue in understanding or assessing the harm is the separation distances involved, the character of Sodbury Road in the immediate context and the fact that, at least for now, there will remain a visual buffer between the southern edge of the conservation area and the application site.' and that,*
- *I would ultimately agree with the HA in that the development proposals would not cause harm to the character or appearance of the Wickwar Conservation Area due to the distances involved between the application site and the historic core of the village.*

To perhaps describe the potential impact of the development proposals in another way, we are in something of a “setting” of “setting” situation here and so in my view any objection on the grounds of loss of setting to the conservation area would be difficult to sustain.”

- 4.79 In the minutes of the South Gloucestershire Council Strategic Sites Delivery Committee of Thursday 03 August 2023 (**CD 4.9**) it is stated that “*Members were concerned that the introduction of a shop would move the centre of the village outside of the Conservation Area, which would be harmful to the heart of the village, which is central to the Conservation Area*” and therefore as a result the “*harm to the character and appearance of Wickwar Conservation Area was attributed moderate weight*”.
- 4.80 It is assumed that the ‘centre of the village’ refers to the High Street character area, being as this lies at the geographical centre and was the location of the village’s medieval, and later, market. Historically the church would also have been a central feature of the village, and the Appraisal describes how the archaeological remains of the medieval manor house and original settlement are present adjacent to it, reflecting the importance of the area around the church as the village’s original centre.
- 4.81 Following the implementation of the appeal proposals (if planning permission is granted), the High Street would still retain all of the elements that reflect its historic role as the centre of the village. Its wide street and rows of historic buildings, which reflect the historic importance of the street (including the Town Hall and Malthouse) and that developed in response to this importance, would still be evident. Likewise, the experience of these historic buildings and spaces would be completely unchanged. As described above, the historic form of the settlement would still be appreciable from the wider landscape, a linear settlement, with High Street at its centre.
- 4.82 As such, the elements of the special historical and architectural interest of the conservation area which relate to the historic, central role of High Street and which contribute to its identification as a conservation area, would be unaffected by the approval and implementation of the appeal proposals. As such, and once again, it is concluded that there would be no harm caused to the significance (or special interest) of the conservation area from the appeal proposals in this regard.
- 4.83 It has been agreed in the Heritage SoCG (**CD 7.9**) that there is no harm to the special architectural or historic interest of the Wickwar Conservation Area.

FRITH FARMHOUSE AND BAKEHOUSE AT SOUTH-EAST, FRITH LANE (1128768)

- 4.84 Frith Farmhouse was designated as a Grade II* listed building on 17 September 1952. It is located c.440m to the west of the appeal site boundary. The ‘details’ of the listing citation are reproduced below:

“ST 78 NW YATE FRITH LANE (north side)

*4/239 Frith Farmhouse, and Bakehouse 17.9.52 at south east - II**

Farmhouse. Late C17, possibly incorporating an earlier building. Rubble; plain tiled roof; rubble stacks. L-plan, with entry direct into the central hall. 2 storeys, cellar and attics in stone gables. 2:3 (in projecting, canted 2 storey and attic porch with hipped roof): 2 bays; C19 marginal glazing bar sash windows and C20 casement windows, which resemble sashes; most under cornice. Cross windows to west gable. Central C20 door. Single storey rubble bakehouse projects at right (south east). Interior: hall, parlour and dairy fireplaces are constructed of neatly coursed rubble and are segmental on plan; stop chamfered beams; doors and hall have bolection moulded surrounds, passage and dairy doors have ovolo moulded surrounds; very fine dog-leg staircase with panelled newel posts, twisted balusters, carved pendants and finials; first floor, C17 panelling from the hall forms a passage, chamfered door frames; attic, reused members and extended collar beam trusses; decorative panel of rose and 4 fleur-de-lys within a lozenge on stack. A very good, although somewhat altered, example of a high class gabled vernacular/gentry house, built for a surgeon who never occupied the property. (Hall, L, Rural Houses of North Avon and South Gloucestershire, 1983).

Listing NGR: ST7178287361".

- 4.85 The appeal site is located c.440m to the east of the listed building. As such, the development of the appeal site could only affect the listed building's wider setting and would have no impact whatsoever on its built form or fabric.
- 4.86 It is assessed that the majority of the listed building's heritage significance is bound up in that built form and fabric, and in comparison, the asset's setting only makes up a small or minority portion of its total significance. This is the only part that could be affected by the appeal site's development.
- 4.87 The significance of the building is assessed at paragraph 5.25 of the Archaeological and Heritage Baseline Assessment (**CD 1.12**).
- 4.88 However, recent additional research conducted in preparing my Proof of Evidence has identified additional information submitted in support of three previous (consented) planning applications (and associated Listed Building Consent applications) at Frith Farmhouse. These should be taken into account in the identification of the current baseline position and in the assessment of potential impacts arising from the proposed development.
- 4.89 These comprise applications:
- For a certificate of lawfulness for the existing use of outbuildings as domestic and existing use of land as residential curtilage (PK12/3153/CLE: approved 12 November 2012);
 - For the conversion of an existing barn to form 1 no. ancillary dwelling with associated works. Demolition of outbuilding and erection of carport (PK12/4070/LB and PK12/4069/F: approved 31 January 2013); and
 - For external and internal alterations including the demolition of extensions to east elevation and erection of three storey extension to north elevation, structural repairs,

replacement fenestration, refurbishment of attics, refurbishment of Bakehouse, modifications to garden walls and other associated works (PK13/2893/LB and PK13/2892/F: approved 30 September 2013).

- 4.90 Having reviewed the details of these three applications, it is apparent that the listed building and some of its outbuildings were substantially modified following the grant of planning permission and Listed Building Consent. These changes are summarised below.
- 4.91 At the farmhouse, single storey ancillary extensions on its eastern elevation - including the ruined remains of a bakehouse - were removed. The building was extended to the north, with a two-storey addition and, at its south-eastern corner with a single-storey extension, replacing the historic bakehouse but reusing its surviving fabric. New windows and an entrance were installed on the eastern elevation.
- 4.92 The approved change to the eastern elevation is particularly pertinent to the assessment and the existing and proposed elevation drawings submitted with applications PK13/2893/LB and PK13/2892/F are included at (**Appendix EDP 2**) in order to illustrate how the building has changed since 2013. At the same time, **Image RS 20** also shows the present east facing elevation of the building.
- 4.93 Regarding its outbuildings, under PK12/4070/LB, PK12/4069/F and PK12/3153/CLE, an L-shaped storage building to the north-east of the farmhouse was converted into a residential building and a 20th century garage to the east was demolished and replaced with a carport on a north-south axis. Additionally, a wall was erected to enclose the yard on its north-east side between the new buildings. The existing and proposed site layout drawings for PK12/4070/LB and PK12/4069/F are included at (**Appendix EDP 3**) in order to illustrate how the layout of the yard has changed since 2013.
- 4.94 The applications were supported by a series of Historic Building Reports written by Kay Ross, buildings historian (McLaughlin-Ross LLP, August 2011; **CDs 6.3, 6.4 and 6.5**). These reports provide a detailed assessment of the history and evolution of Frith Farmhouse and of the relative dates of its structural components and its outbuildings.
- 4.95 Hence, **Proof Plan RS 3** shows as an insert the relative ages of the buildings at Frith Farmhouse. The plans at page 38 and 39 of the Historic Building Report Part I (**CD 6.3**) show the relative ages of the parts of Frith Farmhouse prior to the redevelopment post-2013.
- 4.96 In terms of its significance, Frith Farmhouse is mainly significant on account of its architectural interest and, in that regard and in accordance with the analysis presented in Ross's account, it is some of its internal features that are its oldest and most significant features, dating from the 17th century. These include its doorcases, doors, fire surrounds, wood panelling and staircase. Some of the roof beams in the western part of the house may date from the 16th century.
- 4.97 The oldest part of the building comprised a 16th century hall in the western part of the house, whereas the eastern part did not exist in the early 17th century. The house was extended in the later 17th and 18th centuries and its core structure is mainly a product of the 18th

century. Ross is of the opinion that the entire eastern elevation may have been re-built in the 18th or early 19th centuries.

- 4.98 The recent work served to remove poor quality 19th and 20th century lean-tos from the eastern side of the house, to retain the older 18th or 19th century wall in this location and re-instate ground and first floor windows ‘thought’ to have once been present. Prior to the completion of the recent work, only a single 18th/19th century window aperture was open in the listed building’s eastern elevation. Insomuch as the lean-tos were removed, the current form and appearance of the eastern elevation is a product of the 2013 renovations and represents a new phase in the house’s development. The extension on the north side of the building which forms the northern end of the eastern elevation is entirely modern, albeit emulating in appearance the house’s wider architecture.
- 4.99 As such, in terms of its architectural interest, it is the internal features and western parts of the building that retain and exhibit the greater proportion of its significance. The eastern parts do retain some significance, but their modern appearance is a recent construct, albeit influenced by the appearance of the 18th/19th century finish of the eastern elevation of the house, which has been reinterpreted in the restoration.
- 4.100 The building also possesses a degree of archaeological interest in its fabric, with the older parts of the building in the western end retaining a higher degree of significance particularly where early, 16th century, fabric is thought to be retained.
- 4.101 The building’s historic interest is a lesser component of its significance. In terms of its historical associations, the detailed documentary analysis presented in the Ross report does not identify any association with any particularly important families, the house having been occupied by local yeomanry, albeit of the gentry. The house’s illustration of the post-medieval farming landscape is a much lesser aspect of its significance, in view of the fact that the listed building’s present appearance is partially dictated by the work which was carried out post-2013.

The Listed Building’s Setting and its Contribution to its Significance

- 4.102 The listed building’s wider setting and its contribution to the asset’s heritage significance are set out in paragraphs 5.26 to 5.31 of EDP’s Archaeological and Heritage Baseline Assessment (**CD 1.12**) and elaborated on in the Heritage Addendum (**CD 2.9**) between paragraphs 2.22 and 2.29. However, in light of my enhanced understanding of the impact of the post-2013 redevelopment at Frith Farmhouse and the completion of my additional visit to the property on 11 September 2023, this assessment can be refined (see below).
- 4.103 As a vernacular farmhouse, there is no evidence that the building, whilst evidently of fairly high status, was intentionally sited, orientated or designed to take advantage of or embrace outwards views towards or across the wider surrounding landscape.
- 4.104 There is no evidence that a designed parkland existed at Frith Farmhouse whereby views may have been designed to it. The building’s architectural quality and location at the top of land rising from the west suggests that it was intended to be a prominent and attractive building, certainly after its 18th century redevelopment. However, its relationship with the surrounding landscape appears to have been predominantly based on a functional

association with a working farm and its associated agricultural land rather than in respect of engineered views across the landscape.

- 4.105 The farmhouse is enclosed within private grounds by a stone wall. On its southern side are gardens which are overlooked by the building's southern, front-facing elevation. This elevation contains a central projecting bay of the 18th century which houses its main entrance. It also contains sash windows, of which there are two at each floor either side of the bay with a further window on each side of the bay at each level and another on the front of the bay on the first floor. In gables either side of the bay and in the upper part of the bay are further small casement windows.
- 4.106 The gardens provide a forefront to this primary elevation and are depicted on Ordnance Survey maps from 1882 (**Proof Plan RS 5**) onwards with paths laid out orientated on the house's entrance. The many windows allow views from the house across this space but also, located on the south-facing side of the building, would have been designed to take advantage of this aspect and allow as much light as possible into the interior. This elevation is well-preserved in its 18th century form and the gardens are retained. From this location the architectural significance of the house is experienced from a historically and functionally associated location and thus the gardens contribute highly to the house's significance.
- 4.107 Likewise, gardens extend around the house to the west and north. These spaces also represent a part of the house's grounds that are closely associated with the building, historically and functionally, although historic maps indicate that these areas were, up until at least 1967, yards associated with the working farm with their layout as gardens being a recent development. Whilst these were not entered, it is assumed that they provide an experience of the building and its architectural interest, particularly on its western side whereby its 18th century finish is preserved. As such, these areas also represent a part of the setting of the house that contributes moderately to its significance, albeit less than for the southern garden, given their 20th century date.
- 4.108 The enclosed area to the east of the house was re-designed in 2013. The yard area is enclosed by a newly built wall on its northern and north-eastern edges, with a newly built car-port defining its eastern side and the southern elevation of the recently renovated residential outbuilding to the north. The re-built former bakehouse forms the south-western edge of the enclosed area, dividing the yard from the gardens to the south-west. The house's side entrance from the east, which was reinstated with the completion of the post-2013 works, opens onto a modern patio. The area is an enclosed space from where the house is experienced. Historically, maps indicate that it was part of the farm's yard which extended around the north side of the building and had other outbuildings set around its edges which are no longer extant.
- 4.109 The historic maps and the images of the yard area reproduced in the Historic Building Report on the Outbuildings by Kay Ross (**CD 6.5**) clearly indicate that, prior to the completion of the 2013 works, the area was less enclosed, and its buildings possessed an agricultural character comprising storage structures associated with the farm. The newly constructed buildings possess a more domestic and residential character.
- 4.110 The eastern elevation, which was renovated in 2013, overlooks the yard to the east. The works in 2013 reinstated several historic windows on the east elevation, whereas previously

only a single window had been present on the 18th century elevation. In this regard the 18th century part of the buildings has two double casements on the ground floor and three located on the first floor. These windows are smaller and narrower than those on the southern elevation of the building, probably reflecting the functional nature of the historic association between the building and its service yards to the east, whereby views and the aesthetic appearance of the house were of little importance.

- 4.111 Because of the 2013 development, the yard to the east of the house is less concordant with its historic character and function and its relationship with the farmhouse has changed, it now providing a facility for parking and a frontage to the house's side entrance as well as a space to access the newly formed residence in the outbuilding to the north-east. Its walls serve to delineate it from the working farm areas further to the east and north. Although this space still has a close association with the house and offers a location from where the house can be experienced from a functionally associated space, the change in character means that this space has a slightly diminished historic, functional association with the house and contributes only to a moderate degree to its significance.
- 4.112 Located further to the east and north-east are two large agricultural buildings constructed in the late 20th century. These possess an agricultural function related to the farm and its modern keeping of livestock but otherwise represent large modern structures within the setting of the farmhouse. The buildings are sufficiently distanced from the Grade II listed building (the nearest to the east being c.35m from it) so as not to impose upon the farmhouse or compete with its prominence and so they do not represent a negative element of the listed building's setting, being neutral in terms of their effect upon its heritage significance.
- 4.113 The house's wider setting and its contribution to its heritage significance are described in the Archaeological and Heritage Baseline Assessment (**CD 1.12**) and the Heritage Addendum (**CD 2.9**). In summary the key points are set out in the paragraphs below.
- 4.114 A series of horse paddocks extend c.120 – 280m to the north, west and east of the house, are functionally associated with the house and provide a location from where the house is experienced as a focus of the estate. Accordingly, these paddocks are assessed as making a moderate positive contribution to the significance of the listed building.
- 4.115 The wider landscape beyond the paddocks in all directions comprises agricultural fields bounded by hedgerows. There is no clear functional association between this farmland and the farmhouse even though the fields reflect the house's historic setting as a country residence. From Frith Lane to the south and from some of the surrounding fields including the approach from the north on the PRoW that runs to the east of the house, the house is experienced as a prominent building set on a rise in the landscape. These surrounding locations make a minor positive contribution to the house's significance with more distant fields making no more than a very minor contribution.
- 4.116 The 1838 Tithe map of the Parish of Yate (**Proof Plan RS 4**) gives an indication of the extent of the historic estate associated with Frith Farmhouse, certainly as it was in the 1830s. At that time, the estate comprised the surrounding fields to the north, west, east and south and extended across further agricultural land to the west. Eastwards, the estate ended at

the brook situated c.180m to the east of the house which also marks the parish boundary with Wickwar parish. The estate did not extent to or include the appeal site.

The Appeal Site in Relation to the Setting of the Listed Building

- 4.117 The appeal site is located c.440m to the east of the listed building. The appeal site was not part of the historic landholding of Frith Farmhouse and was instead made up of land in Wickwar Parish and historically associated with South Farmhouse. This detail is recorded on the 1838 Tithe map of Wickwar Parish. As such, the appeal site makes no contribution to the listed building's significance in respect of any historic, functional association.
- 4.118 EDP's Archaeological and Heritage Baseline Assessment (**CD 1.12**) and HIA (**CD 1.13**) identify that no views of Frith Farmhouse are possible from the land within the appeal site. This assessment was reviewed in the Heritage Addendum (**CD 2.9**) which records at paragraph 2.27 and in Image EDP 2.6 of that report that the view *"highlights the distance to the farmhouse and the screening of it by the two existing hedgerows and the modern outbuilding [which sit in the foreground], with only the roof and a very small part of the eastern elevation of the farmhouse just about visible."* It concludes that the view does not allow for an appreciation of the farmhouse as a historic building and does not contribute to its significance.
- 4.119 In his response of 07 March 2023, the Council's CO stated that *"For clarity also the issue of views from the site towards Frith House are not an issue or concern"*, thereby indicating that the visibility of the house from the site does not contribute to the assessment of harm at the lower end of less than substantial as concluded by the Council's CO.
- 4.120 The completion of my visit to the property on 11 September 2023 showed that, from Frith Farmhouse, a view to the site is only possible from the house's first floor windows on its eastern elevation (**Images RS 17** and **18**). The enclosure of the yard to the east by walls, a cherry tree and buildings screen views of the appeal site from ground-level (**Image RS 19**)
- 4.121 As described above, the east facing elevation, historically (at least from the 18th century), appears to have had a series of double casement windows overlooking the eastern parts of its adjacent yard and agricultural outbuildings. Whilst windows, by their transparent nature, allow for a view through them outwards, their primary function is to let light into a building and to provide ventilation. The Oxford Dictionary of Architecture and Landscape Architecture states the primary definition of a window as:
- "(1) Aperture in a wall to allow light and air to enter a building."*
- 4.122 The windows on the eastern elevation at Frith Farmhouse (**Image RS 20**) display no characteristics that suggest they were designed to function as locations from where views out across the countryside were intended to be obtained. They are relatively small and narrow, especially when compared with the windows on the southern elevation. Historically they would have looked out across a yard and service buildings. Typically, such elements of a house's estate are situated away from areas where polite views were intended.
- 4.123 The view beyond the yard is across a single field (now divided into modern paddocks) and then away from Frith Farmhouse's historic landholding towards Wickwar parish. It seems

more likely that if views out were intended from the house to take in the wider countryside, they would have been to the south, south-west and west where Frith Farmhouse's more extensive holdings were situated (see the Tithe map of Yate parish) and where the land drops away, thus facilitating a broader view. In looking at the house, if such views were ever intended, they would have been most available from the windows on its southern elevation, thus away from the appeal site.

- 4.124 As such, it is assessed that the primary function of the windows on the eastern elevation of the farmhouse was to allow light into and provide ventilation for rooms situated on the eastern side of the building. In this regard, views outwards from the building to the east, through the first-floor windows, have little relevance to the architectural and historical interest of the building.
- 4.125 The view from the first-floor windows is to the north-east (**Proof Plan RS 3** and **Image RS 17**) and is between a modern agricultural building and the renovated outbuilding that is now a residential annex, with a modern stone wall, a cherry tree and part of a shipping container positioned in the foreground. Part of the steel and timber frame of a former extension of the modern agricultural building is also present in the foreground, as well as several fences that bound the adjacent paddocks.
- 4.126 It is apparent that in this view there are also two hedgerows situated between the appeal site and the edge of the paddocks adjacent to the buildings at Frith Farmhouse. These comprise the row of mature trees and shrubs that line the brook c.188m to the east, and a homogeneous, managed hedgerow that bounds fields within the landholding of South Farm, located c.350m to the north-east. As such, it is possible to see only a very small proportion of the land at the appeal site in this outward view from the farmhouse.
- 4.127 Behind the hedgerows, the view includes modern development of c.2020 in the southern part of Wickwar and includes the roofs and side elevations of modern houses. Beyond the houses, forming the backdrop in the view, are wooded hills.
- 4.128 In this regard, the view contains numerous modern elements and provides only a very limited experience of the setting of agricultural fields to the east of Frith Farmhouse.
- 4.129 Consequently, it is apparent that part of the appeal site is part of the distant, wider setting of Frith Farmhouse. However:
- The windows at the farmhouse from where the view is available were unlikely to have been intended as viewpoints and thus views from them have little relevance to the architectural and historical interest of the building;
 - The appeal site forms only a very small part of the agricultural fields visible in a narrow view from the first floor of the farmhouse which also includes modern built elements, fences and hedgerows;
 - The land within the appeal site has no historic, functional association with the farmhouse; and

- There is only a distant view of the farmhouse's roof and part of its side elevation, situated behind vegetation and a modern building, from the appeal site, that has not raised any concerns with the Council's CO.

4.130 As such, it is assessed that the land at the appeal site makes no contribution to the significance of Frith Farmhouse as a designated heritage asset.

The Appeal Proposals in Relation to the Setting and Significance of the Listed Building

- 4.131 The appeal proposals would be visible in the narrow view to the north-east from the first floor of the farmhouse. The houses would, however, be at least partially screened by the row of trees proposed along the western elevation of the appeal site. This is illustrated on the Illustrative Parameter Plan – Green Infrastructure (Turley BLOA3039_36011). The proposed residential dwellings would be set back due to the open space and attenuation basins that are proposed along the western edge of the development.
- 4.132 As such, only a very limited view, probably of the roofs of the proposed houses, would be possible. Viewpoint 5 of the Verified Views (Appendix EDP 1 of Mr Gardner's Proof of Evidence), although not from Frith Farmhouse, gives a good impression of the screening effect of the row of trees proposed along the western boundary of the appeal site once they mature (at 15 years).
- 4.133 As noted above, the appeal proposals would be seen against the existing roofs and elevations of the housing present in Wickwar. As such, the implementation of the appeal proposals would not introduce a new form of development into this restricted view.
- 4.134 The appeal proposals would also be seen across only a very small area of the available view from Frith Farmhouse. As illustrated by **Images RS 17 and 18**, the view to the north-east from the first-floor windows predominantly comprises a view of the adjacent yard, its modern walls, the modern car port building opposite to the east, the renovated residential annex outbuilding to the north and, beyond the yard to the east, the late 20th century timber and breeze block agricultural building and its protruding steel and timber frame on its north side. The narrow view to the development would only be available between buildings with a modern shipping container, a cherry tree, a steel and timber building frame, field boundary timber fencing and several hedgerows in the foreground. Furthermore, no view would be available from ground level at the listed building.
- 4.135 In this regard the distant view of the proposed development would be very much a view across a modern landscape populated by modern features, both modern residential and agricultural features associated with Frith Farmhouse and, in the distance, modern buildings at Wickwar. The view would also retain a very limited view of hedgerows and grassed fields in the foreground of the appeal proposals that would continue to reflect the historic setting of the farmhouse, whereby it has historically been surrounded by agricultural land.
- 4.136 As described above, there is no evidence in the farmhouse's siting, the appearance of its eastern windows and their likely function, and, through its historic spatial and visual relationship with its adjacent farmyard to the east, that the availability of a view from the windows on the eastern elevation has any relevance to the architectural and historical

interest of the building. Furthermore, the view is from windows that were, aside from one, reinstated following the renovation of the house's eastern elevation in 2013 and thus is at its present degree of availability because of those recent works.

- 4.137 In summary, the appeal proposals would be visible from the first-floor windows on the eastern elevation of Frith Farmhouse. However, the availability and scope of this view has little relevance to the significance of the farmhouse. Furthermore, it is assessed that the appeal proposals would have very little presence in the wider setting of Frith Farmhouse, as experienced from the house, and therefore this change to the asset's setting would not result in any harm to the significance of the listed building.

SOUTH FARMHOUSE (1321153)

- 4.138 South Farmhouse is a Grade II listed building located c.28m from the appeal site's northern boundary. It is assessed that the majority of the listed building's significance is bound up in its built form and fabric. Therefore, the asset's setting only makes up a small or minority portion of the listed building's total significance, and this is the only part that could be affected by the appeal site's development.
- 4.139 The listed building is described, and its significance articulated, at paragraphs 5.37 – 5.38 of the Archaeological and Heritage Baseline Assessment (**CD 1.12**).
- 4.140 In accordance with Step 2 of the process in GPA 3 (HE, 2017) (**CD 4.12**), the setting of the farmhouse and its contribution to its significance are set out at paragraphs 5.39 – 5.44 of the Archaeological and Heritage Baseline Assessment (**CD 1.12**).
- 4.141 The contribution made by the appeal site to the significance of the farmhouse and, in accordance with Step 3 of the process in GPA 3 (HE, 2017), the potential impact of the appeal proposals on its significance are set out at paragraphs 3.18 – 3.24 in the HIA (**CD 1.13**), taking account of imbedded mitigation within the project design. These were confirmed as still valid following the resubmission at paragraph 3.9 of the Heritage Addendum (**CD 2.9**).
- 4.142 In summary, the assessment is as follows, that there is a historic and functional connection between South Farmhouse and the farmland within the appeal site, whereby the appeal site comprises land associated with South Farmhouse.
- 4.143 The association is most evident where the appeal site forms the surroundings in which the listed building is experienced as a historic farmhouse set within farmland. From within the appeal site, a clear view of the farmhouse is not possible for the most part, as it is partially or completely screened by intervening modern farm buildings, field boundary hedgerows or the residential buildings and garden boundaries to the south of the farm.
- 4.144 The only location within the appeal site from where the house can be experienced with a measure of clarity (such that its architectural features of special interest can reasonably be appreciated) is from the small field to the immediate south of it, from where views are uninterrupted.

- 4.145 As such, by providing an experience of the farmhouse from historically associated farmland the small field to the immediate south of the farm makes a minor contribution to its overall significance. The wider appeal site, on account of its historical association, makes only a very minor contribution, because the house is not experienced in views or is experienced as only glimpses of the roof and chimneys.
- 4.146 The assessment concludes that the appeal proposals would not affect any of the significance that is contained in the physical fabric of the building because this would be left untouched by the approval and implementation of the development. Likewise, most of the significance derived from the asset's setting would also be undiminished because most of the asset's setting would be unchanged as a result of the proposals.
- 4.147 The small field to the south would become crossed by an access road but would otherwise be developed as allotments and with orchard planting. These provisions would retain the openness of the space and the farmhouse would continue to be experienced from it, albeit no longer from a pastoral field. For the rest of the appeal site its character would change although the retention of hedgerows and open space on the western edge of the development would retain a degree of its existing character as agricultural land, notably the present division into three fields.
- 4.148 The assessment concludes that the change in character to part of its historically and functionally associated farmland setting would result in a very minor degree of less than substantial harm to the significance of the Grade II listed building.
- 4.149 In their response of 07 March 2023 (**CD 3.4**) the South Gloucestershire Council's CO Rob Nicholson states that:
- "After reviewing the amended proposals, taking the further mitigation measures into account and having visited the site, I would agree with the HA that the development proposals would result in a less than substantial harm to the significance of the Grade II South Farm and would concur that the harm would also be limited as suggested, i.e. towards to the lower end of the spectrum."*
- 4.150 It is agreed in the Heritage SoCG (**CD 7.9**) that the implementation of the appeal proposals would result in less than substantial harm to the significance of South Farmhouse at the lower end of the spectrum.
- 4.151 Whilst this position is agreed with the Council, it is important to underline that harm from change within an asset's setting should, unless the asset has a setting that is especially relevant to its significance over and above its actual fabric, only ever be of a relatively low scale. This is because, in line with the NPPF, it is only the significance that the asset derives from its setting that is affected, not any of that which is contained in its actual fabric. Typically speaking, the majority of an asset's significance is bound up in the asset itself and so its wider setting in the landscape contributes only a lesser proportion.
- 4.152 This position has been confirmed by the Secretary of State for Levelling Up, Housing and Communities regarding a planning application at Edith Summerskill House, Clem Atlee Court, London on 04 July 2022 (Reference APP/H5390/V/21/3277137). In their Report, at IR12.50, the Planning Inspector made the same statement, that:

“In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.”

4.153 This statement was endorsed by the Secretary of State in paragraphs 11 to 15 of the Decision Letter (Reference APP/H5390/V/21/3277137 – 04 July 2022), where they agreed with the Planning Inspector’s reasoning and applied it to the assets in question.

SUMMARY OF EFFECTS ON DESIGNATED HERITAGE ASSETS

4.154 Based on the above, **Table EDP 4.1** below summarises the result of my assessment, that of the Council’s CO and that as set out in the Council’s Statement of Case in terms of the appeal proposals’ impact on heritage assets.

Table EDP 4.1: Harm Assessed to Designated Heritage Assets

Heritage Asset	Appellant’s Assessment	Conservation Officer’s Assessment (CD 3.4)	Council’s Assessment as per Statement of Case (CD 7.2)	Council’s Assessment subject to the agreed SoCG (CD 7.9)
Wickwar Conservation Area	No harm to its significance.	No harm to its significance.	Less than substantial harm at a moderate level.	No harm to the special architectural or historic interest of the Wickwar Conservation Area.
Grade II* listed building Frith Farmhouse	No harm to its significance.	Very limited harm towards the lower end of the spectrum of less than substantial harm.	Less than substantial harm at the lower end of the scale.	Less than substantial harm at the lower end of the scale.
Grade II listed building South Farmhouse	A very minor degree of less than substantial harm.	Limited, less than substantial harm at the lower end of the spectrum.	Less than substantial harm at the lower end of the scale.	Less than substantial harm at the lower end of the scale.

Section 5 Conclusions

- 5.1 My Proof of Evidence has been prepared in response to and addresses part of RfR 1 of the Council's two reasons for refusing Outline Planning Application P22/01300/O, following the appellants submission of an appeal against its non-determination. Part of reason (1) is concerned with heritage matters:

"The adverse impacts of the proposal with regard to:

- Less than substantial harm to South Farm – great weight*
- Less than substantial harm to Frith Farm – great weight*
- Less than substantial harm to Wickwar Conservation Area – great weight".*

- 5.2 Paragraph 4.2 of the Council's Statement of Case (**CD 7.2**) sets out its case on heritage matters and identifies that:

"The natural and historic environment is a finite and irreplaceable resource, and the protection of heritage assets is a priority nationally, as well as one for the Council. The Council will show that the appeal proposal will result in less than substantial harm (at the lower end of the scale) to the setting and significance of the Grade II listed Frith Farm and Grade II Listed South Farm. It will also show that the proposal will cause less than substantial harm to the Wickwar Conservation Area (at a moderate level). Great weight needs to be given to these harms."*

- 5.3 There is common agreement with the Council that the appeal proposals would result in less than substantial harm to the significance of the Grade II listed building South Farmhouse (**1321153**) at the lower end of the spectrum.
- 5.4 There is also common ground that there is no harm to the special architectural or historic interest of the Wickwar Conservation Area. Thus, the implementation of the appeal proposals would result in no harm to the special interest of the Wickwar Conservation Area and therefore its character and appearance would be preserved.
- 5.5 This assessment of no harm to the conservation area is in accordance with that of the Council's CO, who also assesses no harm to its character and appearance which would be preserved. Thus, two heritage experts have both assessed the proposals and drawn the same conclusion in terms of this designated heritage asset.
- 5.6 The appeal proposals would be located c.330m from the conservation area, across a very small and entirely detached proportion of its wider setting of agricultural land and are completely separated from its historic core areas which contain the majority of its special interest. Consequently, the appeal proposals cannot, in light of the analysis, which is set out in **Section 4** above, reasonably be considered to cause any harm to the conservation area's special interest.

- 5.7 The Council's Statement of Case assesses a 'moderate' level of less than substantial harm to the conservation area's character and appearance. This assessment is a considerable jump from the CO's position, assessing harm at a level that is a long way along the scale of less than substantial harm.
- 5.8 The Council's assessment of 'moderate' less than substantial harm, from change to a distant part of the setting of the conservation area, should be considered in the context of the Edith Summerskill House appeal decision (Reference APP/H5390/V/21/3277137), which is described in paragraphs 4.151 – 4.513.
- 5.9 As described, this is regarding the assessment of harm to a heritage asset where the majority of their significance is contained within the asset itself and not within its setting. The majority of the conservation area's special interest is located within the conservation area, with that possessed by the wider landscape of agricultural fields, adjacent to the conservation area, only relating to one aspect of its setting, its 'rural setting' as defined in the Council's adopted Appraisal, and thus representing a much lesser proportion.
- 5.10 As such, even if harm was deemed likely to arise from the appeal proposals, the level of that harm could not progress to any great degree along the scale of less than substantial harm, as it could only be to a very small proportion of the wider setting of the conservation area and that itself makes only a minority contribution to its overall significance. Nonetheless, in this case, it is my view and the Council's CO view that there would in fact be no harm to the conservation area anyway and that its character and appearance would be preserved.
- 5.11 It is also concluded that the implementation of the appeal proposals would change the wider setting of the Grade II* listed Frith Farmhouse (**1128768**), but even still this change would not result in harm to its significance.
- 5.12 In that sense, it is only the limited *less than substantial harm* which would be caused to South Farmhouse which must be applied to the paragraph 202 heritage balance outlined in the NPPF. Whilst the decision maker must be mindful of paragraph 199 and its emphasis on "*great weight*" being afforded to the conservation of designated heritage assets such as South Farmhouse, as well as the subsequent paragraph 200 and its requirement for "*clear and convincing justification*" to be provided for any harm to a designated heritage asset, there is nothing in legislation, case law or national planning policy that proscribes harm to a listed building and it is instead for the decision maker to weigh the public benefits of the development against the harms that would be caused in reaching their decision on its acceptability.
- 5.13 With regard to Policy CS9 of the adopted South Gloucestershire Core Strategy – Managing the Environment and Heritage, new development will be expected to ensure that heritage assets are conserved, respected and enhanced in a manner appropriate to their significance. It is contended that the mitigation proposals embedded in the design of the appeal proposals do respect the settings of the three heritage assets, having been designed to reduce or negate impacts due to change within their settings.

- 5.14 A similar conclusion is drawn with regard to Policy PSP17 of the Policies Sites and Places Plan whereby the proposed mitigation has been designed to protect the three heritage assets from change within their settings, serving to negate or reduce the level of impact.
- 5.15 Overall, there is some conflict with the heritage policy requirements of both Policy CS9 and PSP17, however, as concluded in the recent Thornbury decision (**CD 5.1**) both policies conflict with the NPPF. This point and the implications for weighting in the planning balance are discussed in greater detail in Section 7 of the Proof of Evidence - Planning.
- 5.16 In terms of the 'heritage balance' it is worth highlighting the exercise that was carried out by the Council's Case Officer in presenting their recommendation to approve the planning application and grant planning permission ahead of the 03 August and 08 August 2023 Committees of South Gloucestershire Council.
- 5.17 In a context, where the Council's CO had advised the Case Officer that there would be no harm to the Wickwar Conservation Area, very limited less than substantial harm to Frith Farmhouse Grade II* listed building and a similar level of harm to South Farmhouse, the Case Officer still concluded the paragraph 202 balance as follows:
- "Great weight needs to be given to the harm caused to the setting of the listed buildings albeit the harm is limited. It is considered that when this harm is balanced against the benefits of the scheme as required under paragraph 202 of the NPPF the benefits outweigh the harm to both South Farm and Frith Farm. Therefore the harm to heritage does not on its own provide a clear reason for refusing permission."*
- 5.18 In other words, within a context where the Case Officer accepted that there would be harm caused to two listed buildings (designated assets), they still concluded that the benefits of development would outweigh that harm and struck the paragraph 202 balance positively in favour of the proposals.

Appendix EDP 1 Images



Image RS 1: View along the High Street in Wickwar Conservation Area.



Image RS 2: View to the southern edge of Wickwar Conservation Area from Sodbury Road.



Image RS 3: View south along the Buthay illustrating its enclosure within the settlement.



Image RS 4: View to the southern end of High Street.



Image RS 5: View towards the Church of the Holy Trinity in the northern part of the conservation area.



Image RS 6: View west across fields within the northern part of the conservation area.



Image RS 7: View north from the churchyard to the fields adjacent to the conservation area.



Image RS 8: View to the south-west from the southern end of the Buthay illustrating the agricultural fields in the conservation area's setting.



Image RS 9: View to Wickwar from the western part of the conservation area back along one of the PROW.



Image RS 10: Views south from the western part of the conservation area across agricultural land.



Image RS 11: Views south towards the appeal site from the southern edge of the western part of the conservation area.



Image RS 12: View north along Sodbury Road from adjacent to the appeal site.



Image RS 13: View north from Sodbury Road illustrating its modern appearance.



Image RS 14: View north along Sodbury Road noting the edge of the conservation area in the distance.



Image RS 15: View to the southern edge of the conservation area from Sodbury Road.



Image RS 16: View west from Sodbury Road at the southern edge of the conservation area across agricultural fields.



Image RS 17: View to the north-east from the first-floor window at Frith Farmhouse.



Image RS 18: Broader view to the east from the first-floor window at Frith Farmhouse illustrating the full extent of the view.



Image RS 19: View to the north-east from ground level at Frith Farmhouse.



Image RS 20: Image illustrating the present appearance of the eastern elevation of Frith Farmhouse following the 2013 renovations.

Appendix EDP 2
Existing and Proposed Elevation Drawings Submitted with
PK13/2893/LB and PK13/2892/F



South Elevation



East Elevation

Drawing Revisions			
ISSUE	DATE	REVISION	BY
REV A	28/07/11	Adjusted to suit site survey	KIM
REV B	07/02/13	Redrawn based on D&H Survey, 1:50 @ A1	KIM

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STATUS: PROVISIONAL ONLY		
PROJECT: Frith farm, Frith Lane, Wickwar		
DRG TITLE: Existing South and East Elevation		
JOB NO:	DRG NO: 06	REV: B
SCALE: 1:50 @ A1	DRN BY: KIM	
DATE: 05/2011	CKD BY:	

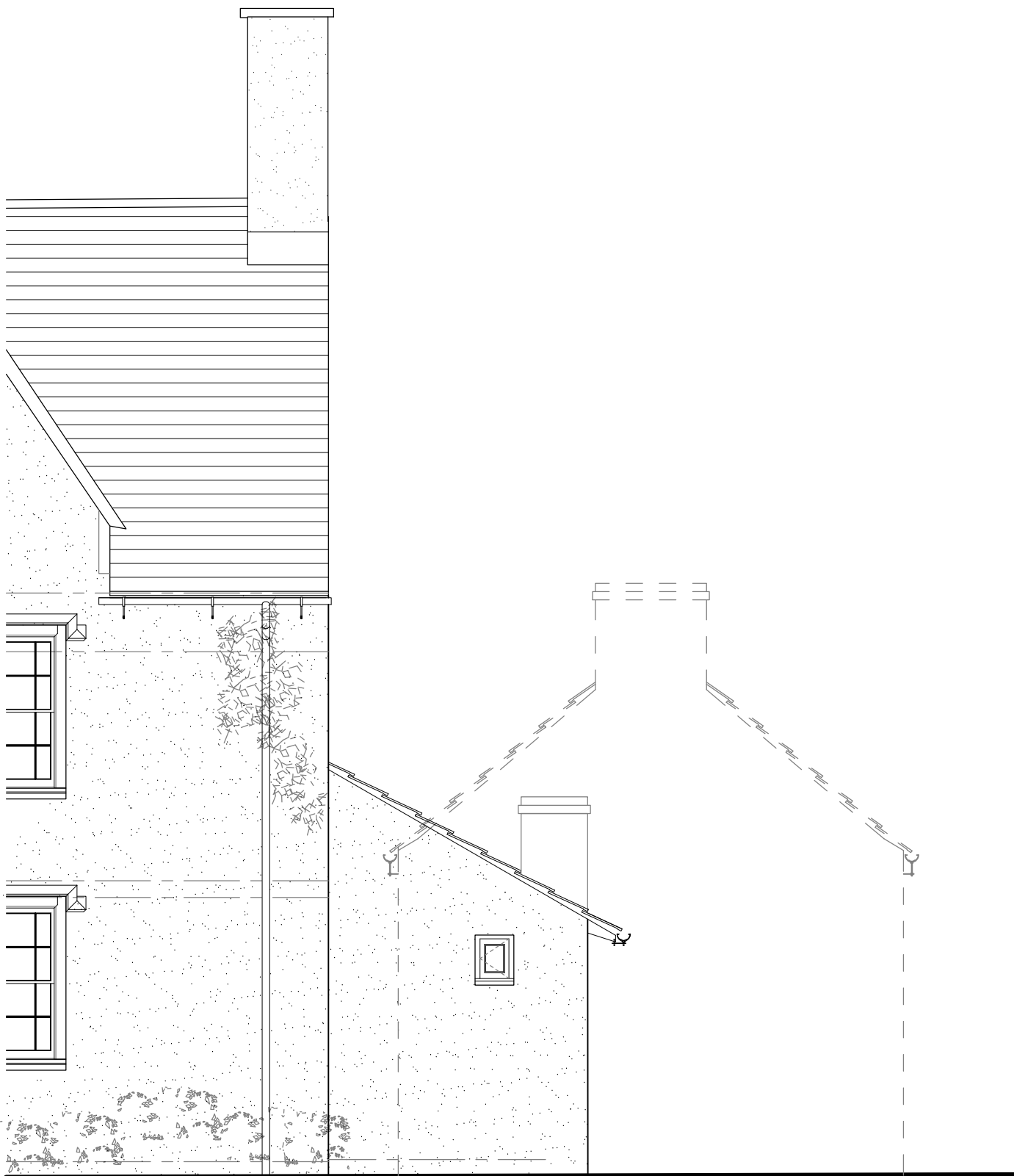


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South Elevation



South Elevation, Bake House removed



East Elevation

Drawing Revisions			
ISSUE	DATE	REVISION	BY
REV A	05.07.11	Revised to clients comments	KIM
REV B	12.07.11	Revised to clients comments	KIM
REV C	03.08.11	Adjusted to suit site survey	KIM
REV D	01.03.12	Extended to rear instead of side	KIM
REV E	16.03.12	Re-plan	KIM
REV F	28.03.12	General amendments	KIM
REV G	31.05.12	Extension re configured	KIM
REV H	28.06.12	Chimney indicated for boiler	KIM
REV J	19.02.13	Redrawn based on D&H Survey, 1:50 @ A1	KIM
REV K	28.06.13	General amendments	KIM


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STATUS:
PROVISIONAL ONLY

PROJECT:
Frith farm, Frith Lane, Wickwar

DRG TITLE:
Proposed South and East
Elevation

JOB NO:	DRG NO: 24	REV: K
SCALE: 1:50 @ A1	DRN BY: KIM	
DATE: 06/2011	CKD BY:	




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Appendix EDP 3
Existing and Proposed Site Layout Drawings Submitted with
PK12/4070/LB and PK12/4069/F



Drawing Revisions			
ISSUE	DATE	REVISION	BY
A B C	07.10.11 29.03.12 26.11.12	Additional information added Renumbered EX-01 to 102 Redrawn based on Survey	KIM KIM KIM
DO NOT SCALE THIS DRAWING © HILL CONSTRUCTION (SW) LTD			
STATUS: PLANNING APPLICATION			
PROJECT: Frith farm, Frith Lane, Wickwar			
DRG TITLE: Annexe Existing Site Layout			
JOB NO:		DRG NO: 102	REV: C
SCALE: 1:200 @ A3		DRN BY: KIM	
DATE: 09/2011		CKD BY:	
<div></div>			
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Drawing Revisions			
ISSUE	DATE	REVISION	BY
Rev A	22.10.11	Revised barn and car port indicated	KIM
Rev B	11.11.11	Barn footprint revised, car port moved	KIM
Rev C	17.03.12	Revised to suit revised drawings	KIM
Rev D	29.03.12	Renumbered PR-01 to 103, house footprint adjusted, car port repositioned	KIM
Rev E	05.04.12	Store to out building removed, over head services removed	KIM
Rev F	26.11.12	Redrawn based on Survey	KIM


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STATUS:
PLANNING APPLICATION

PROJECT:
Frith farm, Frith Lane, Wickwar

DRG TITLE:
Annexe Proposed Site Layout

JOB NO:	DRG NO: 103	REV: F
SCALE: 1:200 @ A3	DRN BY: KIM	
DATE: 10/2011	CKD BY:	



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Plans

Proof Plan RS 1: Appeal Site and Designated Heritage Assets
(edp6190_d032b 03 October 2023 GYo/RSk)

Proof Plan RS 2: Appeal Site and Wickwar Conservation Area
(edp6190_d033a 03 October 2023 GYo/RSk)

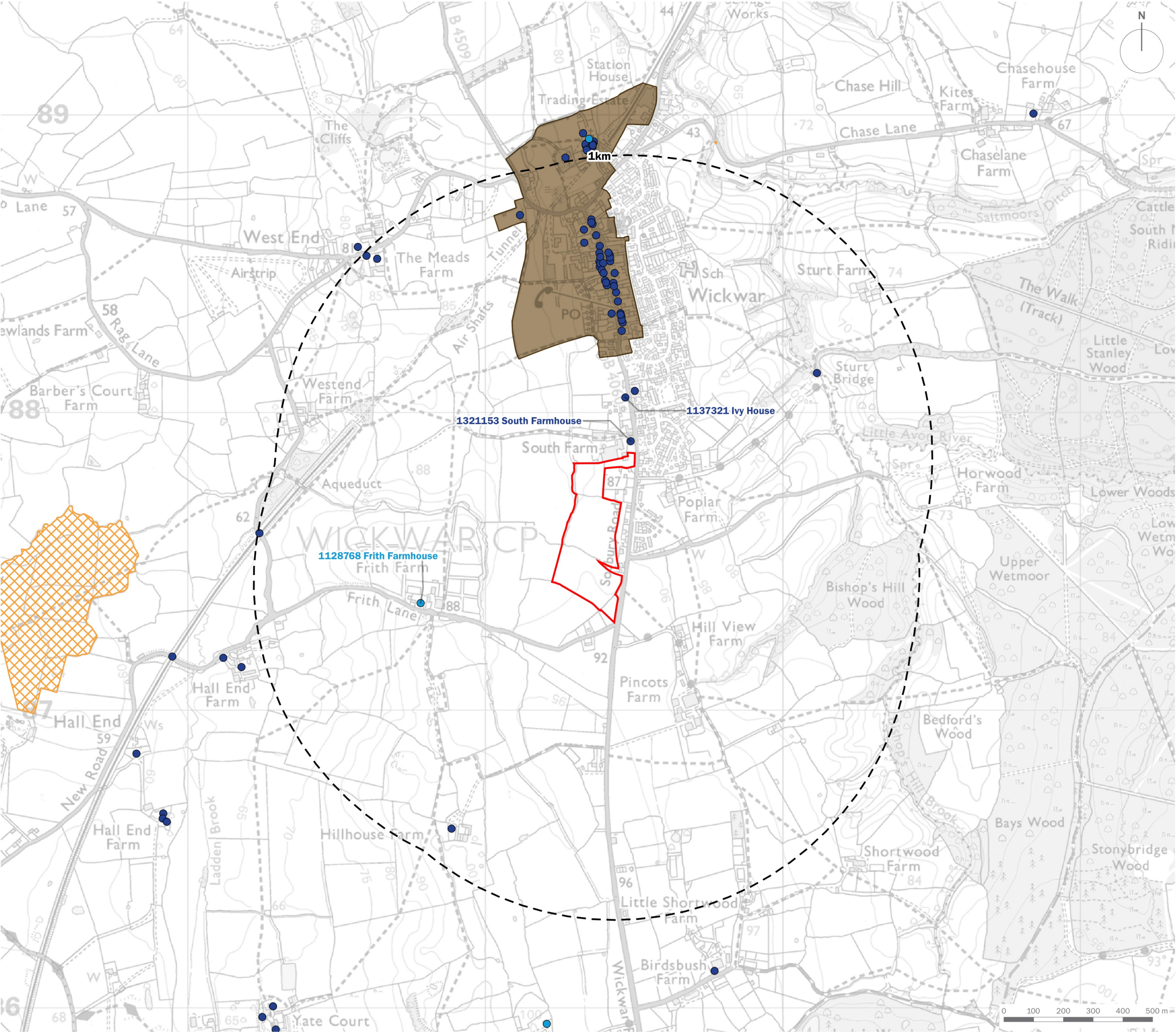
Proof Plan RS 3: Appeal Site and Frith Farmhouse
(edp6190_d034a 03 October 2023 GYo/RSk)

Proof Plan RS 4: Extract from the 1838 Tithe Map of Yate Parish Showing the Landholdings
Associated with Frith Farmhouse
(edp6190_d035a 03 October 2023 GYo/RSk)

Proof Plan RS 5: Extract from 1882 Ordnance Survey Map Showing Frith Farmhouse
(edp6190_d036a 03 October 2023 RBa/RSk)

Proof Plan RS 6: Historic Evolution of the Settlement at Wickwar
(edp6190_d037a 03 October 2023 VMS/RSk)

Proof Plan RS 7: Historic Maps of the Wickwar Conservation Area
(edp6190_d038a 03 October 2023 VMS/RSk)



PROOF PLAN RS 1

- Site Boundary
- 1km Study Area
- Wickwar Conservation Area
- Scheduled Monument
- Grade II* Listed Building
- Grade II Listed Building

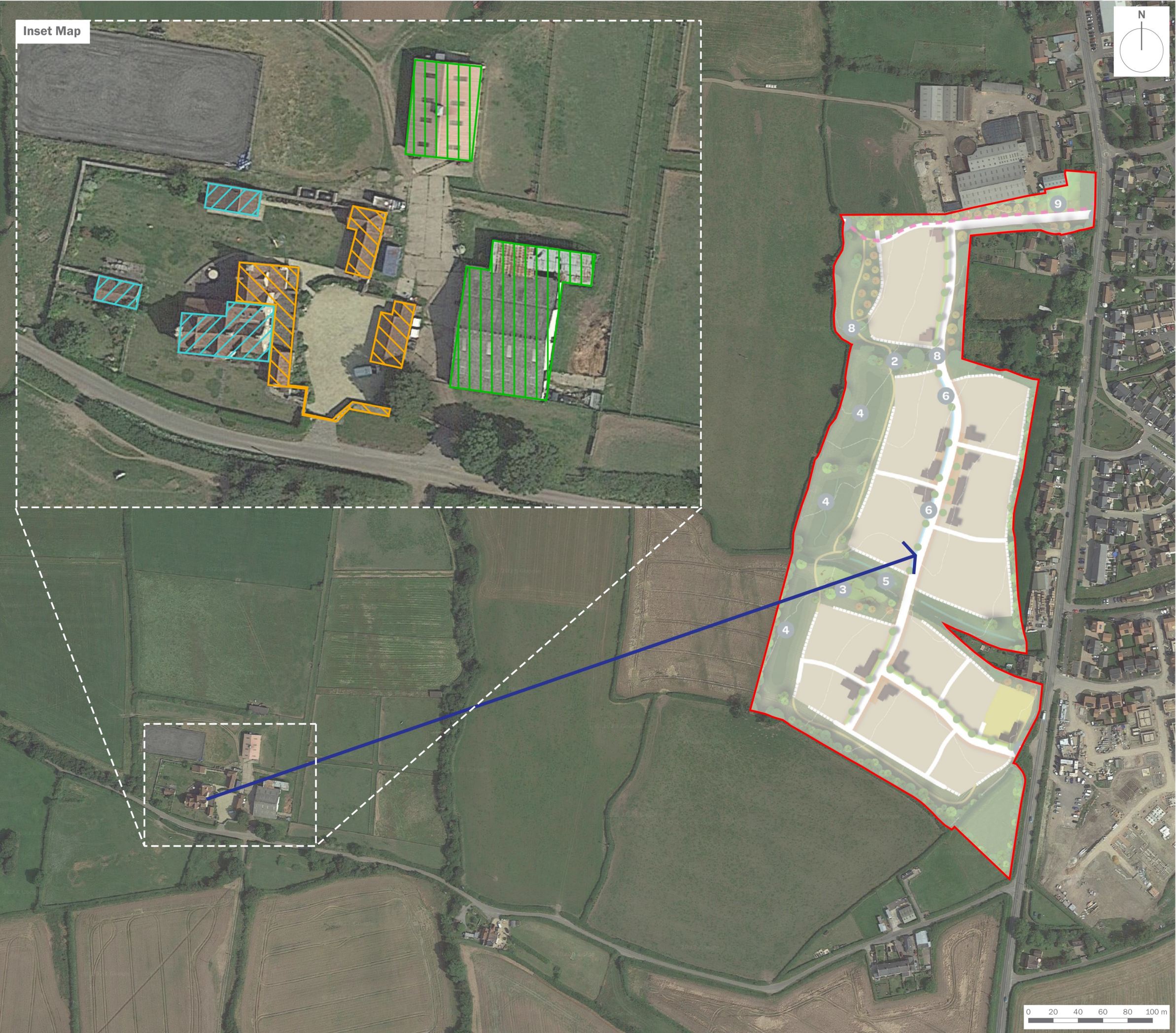
client			
Bloor Homes South West			
project title			
Land at Sodbury Road, Wickwar			
drawing title			
Proof Plan RS 1: Appeal Site and Designated Heritage Assets			
date	03 OCTOBER 2023	drawn by	GYo
drawing number	edp6190_d032b	checked	RSk
scale	1:12,500 @ A3	QA	DJo



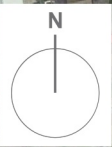
PROOF PLAN RS 2

- Site Boundary
- Wickwar Conservation Area
- Photo Location
- Character Areas
 - High Street
 - Back Lanes
 - Land West of Settlement
 - Northern Area Around Church






client	Bloor Homes South West		
project title	Land at Sodbury Road, Wickwar		
drawing title	Proof Plan RS 2: Appeal Site and Wickwar Conservation Area		
date	03 OCTOBER 2023	drawn by	GYo
drawing number	edp6190_d033a	checked	RSk
scale	1:7,000 @ A3	QA	DJo



Inset Map



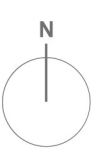
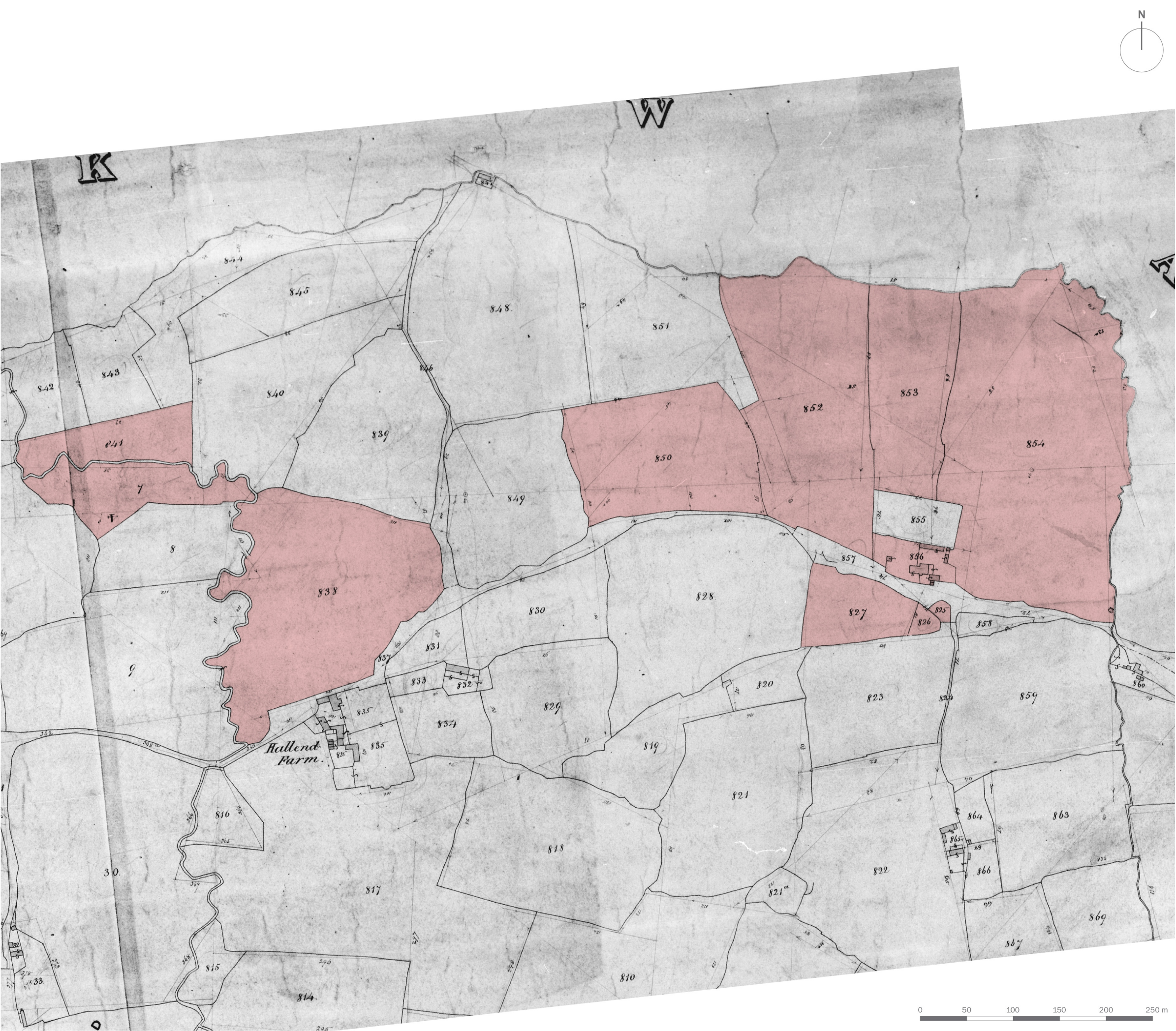
PROOF PLAN RS 3

-  Site Boundary
-  View to Site from Frith Farmhouse (Image RS17)
-  Pre-20th Century
-  Built or Renovated in 2013
-  Late 20th Century Agricultural

client			
Bloor Homes South West			
project title			
Land at Sodbury Road, Wickwar			
drawing title			
Proof Plan RS 3: Appeal Site and Frith Farmhouse			
date	03 OCTOBER 2023	drawn by	GYo
drawing number	edp6190_d034a	checked	RSk
scale	1:3,000 @ A3	QA	DJo



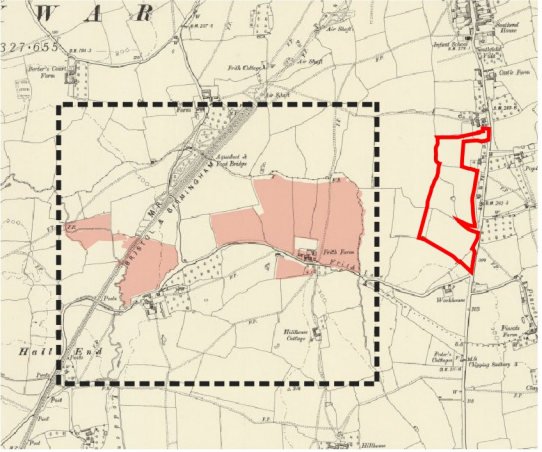
Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



PROOF PLAN RS 4

- Site Boundary
- Landholdings Associated with Frith Farmhouse

Overview



client

Bloor Homes South West

project title

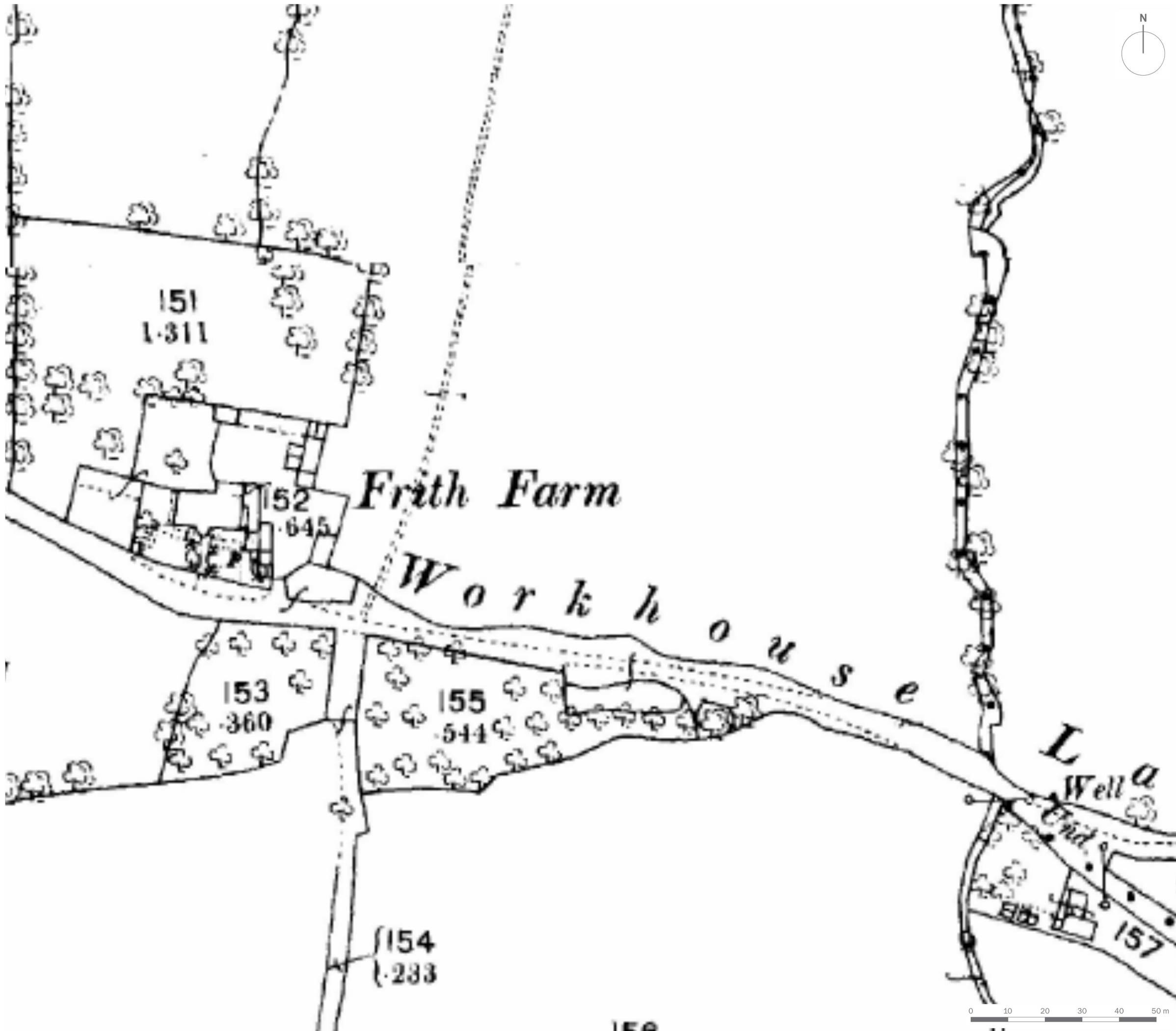
Land at Sodbury Road, Wickwar

drawing title **Proof Plan RS 4: Extract from the 1838 Tithe Map of Yate Parish Showing the Landholdings Associated with Frith Farmhouse**

date	03 OCTOBER 2023	drawn by	GYo
drawing number	edp6190_d035a	checked	RSk
scale	1:4,000 @ A3	QA	DJo



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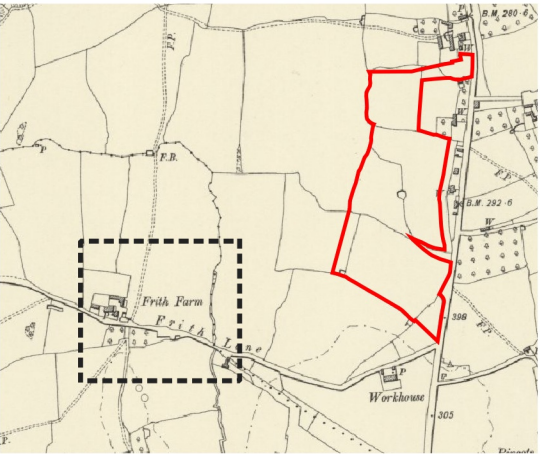


PROOF PLAN RS 5



Site Boundary

Overview



client

Bloor Homes South West

project title

Land at Sodbury Road, Wickwar

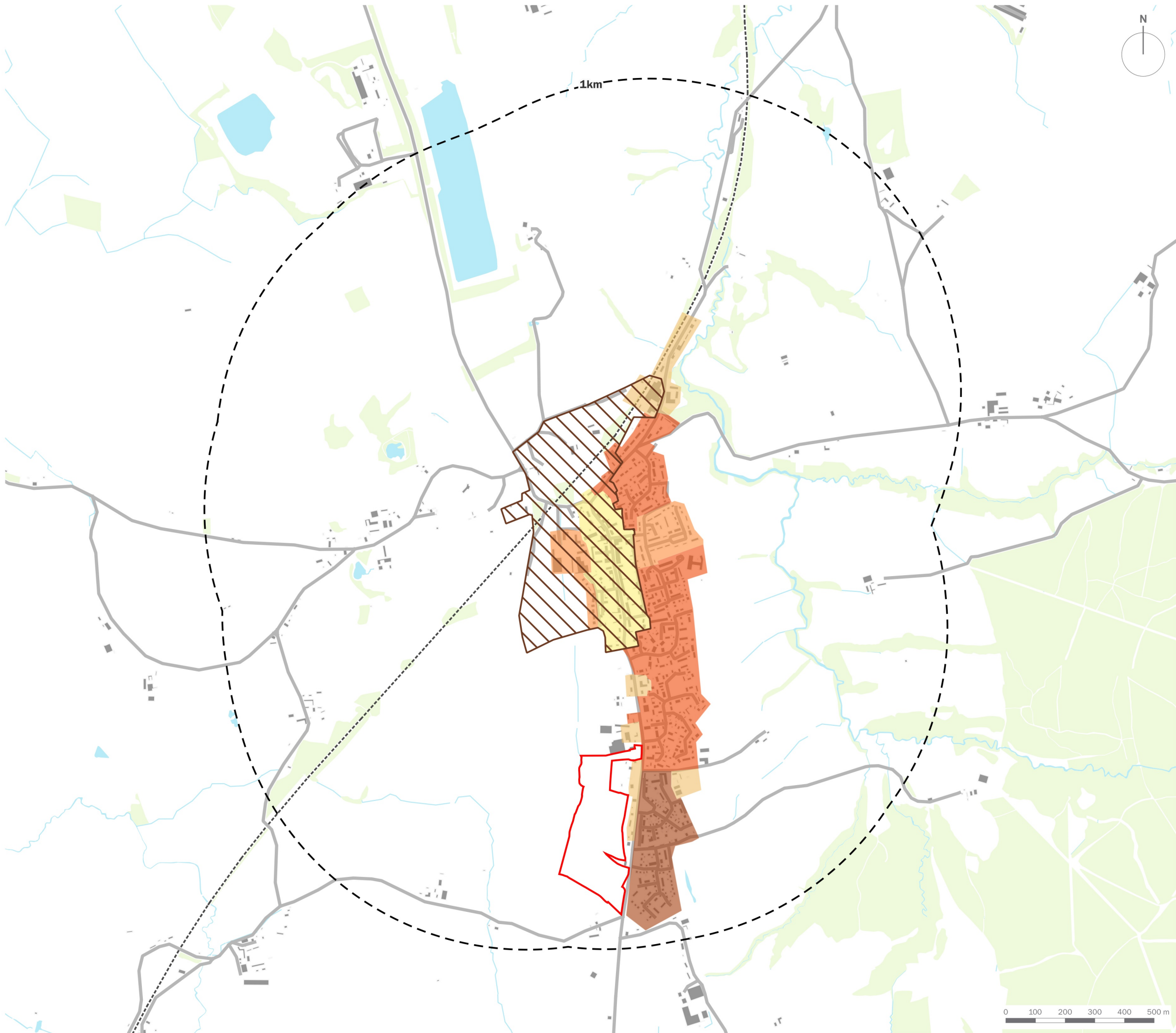
drawing title

Proof Plan RS 5: Extract from 1882 Ordnance Survey Map Showing Frith Farmhouse

date	03 OCTOBER 2023	drawn by	RBa
drawing number	edp6190_d036a	checked	RSk
scale	1:1,000 @ A3	QA	DJo



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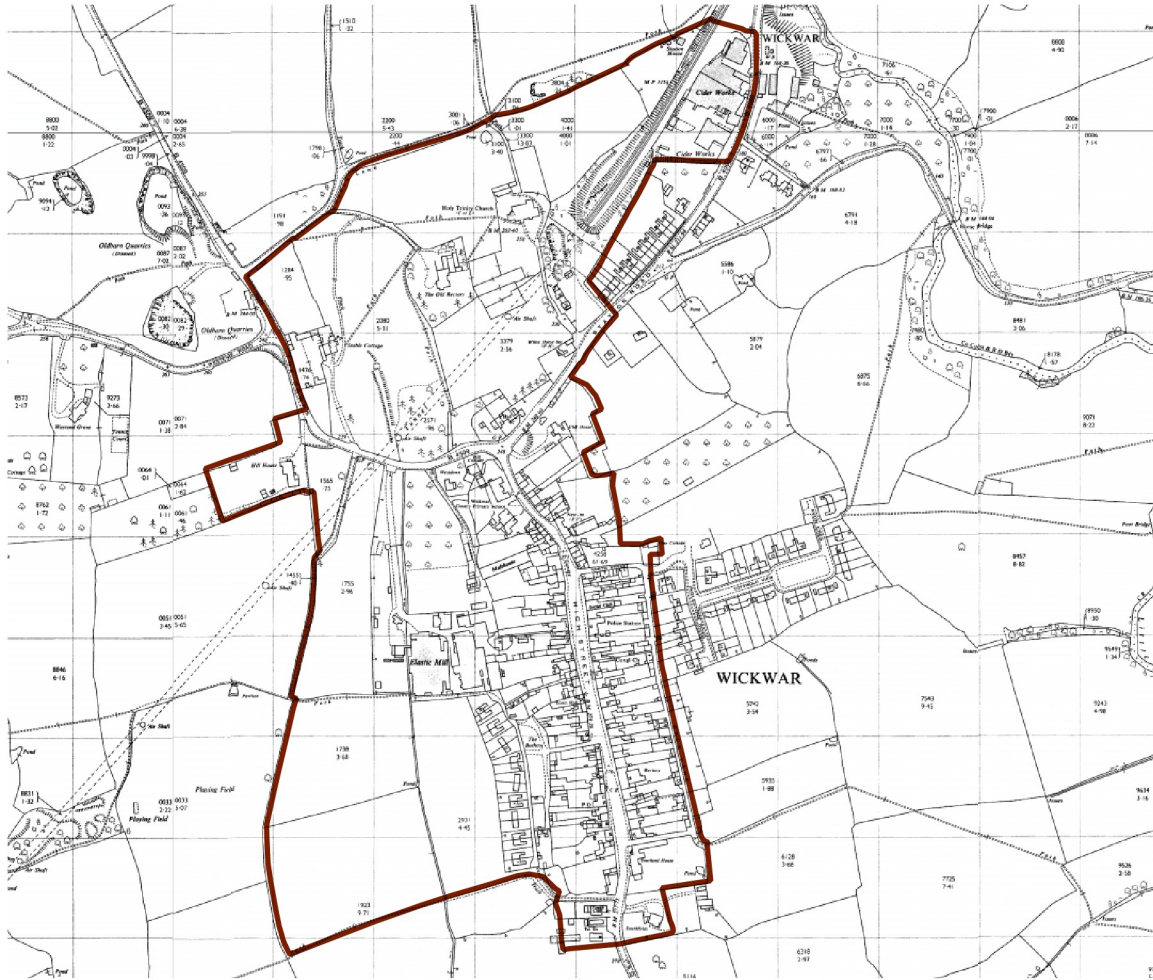
PROOF PLAN RS 6

- Site Boundary
- 1km Conservation Area Range Ring
- Wickwar Conservation Area
- Medieval/Post-medieval Settlement Core
- Pre-mid 20th Century
- Mid 20th Century
- Late 20th Century
- Post 2020

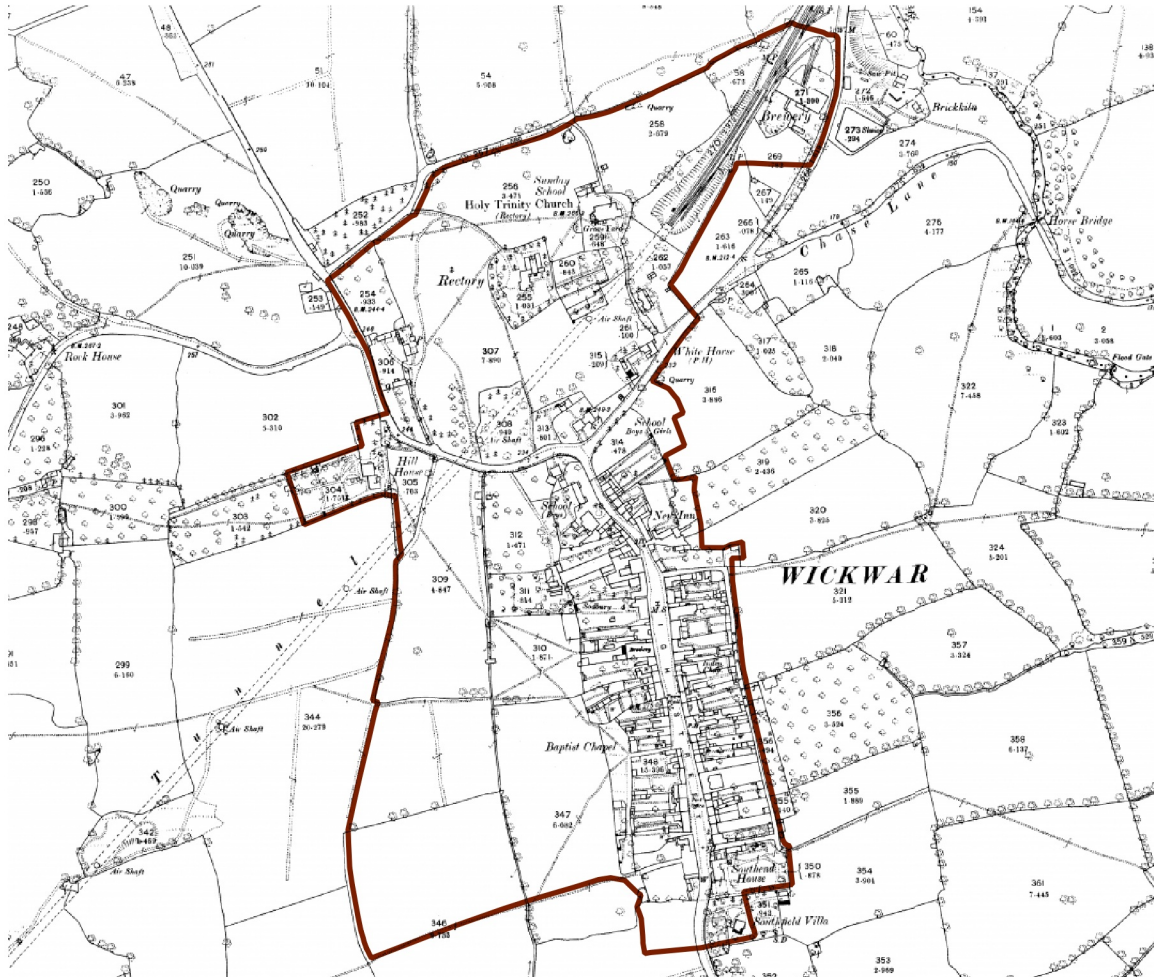
client			
Bloor Homes South West			
project title			
Land at Sodbury Road, Wickwar			
drawing title			
Proof Plan RS 6: Historic Evolution of the Settlement at Wickwar			
date	03 OCTOBER 2023	drawn by	VMS
drawing number	edp6190_d037a	checked	RSk
scale	1:12,500 @ A3	QA	DJo



Excerpt from 1838 Tithe Map of Wickwar Parish



Excerpt from 1967-8 Ordnance Survey Map (1:2,500)



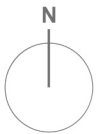
Excerpt from 1880-82 Ordnance Survey map (1:2,500)



Excerpt from 1999 Ordnance Survey map (1:10,000)

PROOF PLAN RS 7

 Wickwar Conservation Area



client

Bloor Homes South West

project title

Land at Sodbury Road, Wickwar

drawing title

Proof Plan RS 7: Historic Maps of the Wickwar Conservation Area

date	03 OCTOBER 2023	drawn by	VMS
drawing number	edp6190_d038a	checked	RSK
scale	1:7,500 @ A3	QA	DJo



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