

BROWFORT, BATH ROAD, DEVIZES.

Comments on the Conservation Officer's observations on the application for six chalet bungalows with car parking.

The report is again predicated on the claim that Browfort is (was – if demolished) a non designated heritage asset. In repeating this claim the CO makes two fundamental errors. The first is the one she made when dealing with the previous application – namely that it is in her gift to declare a site and/or its structure as a non designated heritage asset. This flagrantly disregards the Glossary to Annex 2 of the Framework which clearly states that it is the authority (not an individual officer) who must 'identify' such assets and further ignores the further explanation given by the NPPG of March 2014 on the same subject.

Next, she totally overlooks the fact that Browfort may be demolished under a valid planning permission granted by her Council. The suggestion that the garden would 'remain' such an asset (it never was) even after the demolition of Browfort is frankly ludicrous. There may well be remnants of Victorian planting on the site but beyond the relevant OS map there is not a shred of evidence that there ever was a consciously designed garden as part of the house. Without that information it is impossible for her to claim with any legitimacy:

1. that there is a valuable designed landscape that is worthy of preservation and/or restoration
2. that there is an obvious 'point in time' to which the landscape should be returned
3. that such an imagined 'historic' landscape should (or could) be fitted around the modern development that has already been permitted

It is not part of the Council's planning role to invent spurious claims of heritage value (especially after already granting permission for demolition of what the CO claimed to be a non designated heritage asset) that rest on nothing more than an OS map and whatever remains of any surviving Victorian planting. The latter can easily be retained and integrated into landscape proposals for the site as whole – either under the existing permission (assuming reserved matters include a requirement for detailed landscape plans) or under the current proposals for the bungalows.

The CO has attempted to construct a heritage argument in order to frustrate development she never wanted to see in the first place. Her arguments rest on false assumptions (about whether the site is a non designated heritage asset) and a total lack of historic or reliable evidence to support her case.

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