

**Wiltshire Council  
Western Area Planning Committee**

**22 July 2020**

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**Item 7d - 20/01219/FUL and 20/02055/LBC: Manvers House, No.3 Kingston Road, Bradford On Avon, BA15 1AB**

**Public Statement 1 – OBJECT – Klas Hyllen - Neighbour Group**

This statement has been prepared by Mr Klas Hyllen of Klas Hyllen Architecture of 24 Silver Street, Bradford on Avon, in objection to the above the referenced application and is submitted as a joint statement on behalf of the neighbours listed below.

- Mr Richard Sparks of 1-2 Kingston Road
- Mrs Sally Gold of 6 Mill Lane
- Mr & Mrs Roger & Mary Lou Mitchell of 5 Mill Lane
- Mr & Mrs Richard & Sue Horsley of 4 Mill Lane
- Mr & Mrs Richard & Diana Feroze of 3 Mill Lane
- Mr & Mrs Olly & Jackie Price of 2 Mill Lane
- Mr & Mrs Klas & Ruth Hyllen of The Vintners & 24 Silver Street

Our objections to the application have been numerous throughout the process and are well documented on the planning portal. This short statement cannot go into the objections raised in great detail due to the time restrictions of this meeting. As such we have summarised the key areas of concern below, however we have chosen to limit this statement to the impact of the proposals resulting from the volume of the new roof extension, and want to note that the matter of the proposed change of use is not in accordance with the adopted Neighbourhood Plan, however the Town Council and Councillor Gibson are better placed to comment on this.

Kind Regards,

Mr Klas Hyllen

Statement:

Overbearing, loss of light and unacceptable impact on amenity spaces and privacy

The proposals are particularly impactful on the gardens of Mill Lane and No 1-2 Kingston Road. For example, the garden of No 6 Mill Lane is just some 1.5m away from the existing building and the proposed vertical extension containing the new stair circulation would effectively double the height of the wall to 6m. The garden is facing due south-west and the proposals would result in an unacceptable loss of light and

overshadowing from an overbearing and ill-considered volumetric increase, schemed to counteract the removal of valuable workspace

in Manvers House. The proposed gable extension to the west would have a similar overbearing impact onto the rooflight over the kitchen to No 1-2 Kingston Lane.

There is a proposed condition for the windows to the new stair volume and to the easternmost inverted balcony dormer window to have obscure glazing. However, there is no condition to ensure these windows are fixed and not openable which would in effect mitigate the obscured glazing.

The northern balconies to the mansard roof, now shown with sliding doors opening onto planters with frosted glass balustrades, would allow for a very generous direct view over the garden to The Vintners (clearly visible over the roofs to No 26 from any of the three windows) which would have a detrimental impact on privacy and amenity space.

Incorrect or inadequate contextual information provided

It is clear that the application has not considered the impact the proposals would have on surrounding properties to the west, north and east. Initially this was obvious in that the submission failed to show the context accurately in plan, and omitted to show the topography of the hill, or any surrounding buildings, in sections and elevations. In addition to this, the planning officer has only visited one property (No 24 Silver Street), and has based his decision on outdated photographs. Understandably, and with no effective engagement whatsoever with the local community prior to the application, this has amounted to a great deal of frustration amongst the neighbours for a perceived lack of communication and consideration.

Poor material specification within the Conservation Area

The material specification used within a conservation area is too open-ended and does not give enough detail, especially on the metal roofing. There is a significant difference in textural qualities between for example a cheap painted aluminium roof over a high-quality standing seam zinc or lead.

Finally, whilst the existing 1970's construction is of poor architectural merit, built during a period when substitute re-constituted stone was considered acceptable in a conservation area, this is no excuse for further mediocrity. The town is at the forefront of a strong sustainability and ecology policy, and this should be an opportunity to develop a building in the true retrofirst spirit in line with the RIBA 2030 Climate Challenge, over cladding the existing volume to address energy performance as well as a considered use of materials within a historic setting.

**Item 7d - 20/01219/FUL and 20/02055/LBC: Manvers House, No.3 Kingston Road, Bradford On Avon, BA15 1AB**

**Public Statement 2 – Support – Mel Clinton - Agent**

Nash Partnership have been appointed as architects by owner for the conversion and extension of Manvers House. Our proposals for the residential conversions on the site are similar to plans that we produced for a previous building owner and I will not dwell on these given that, architecturally speaking, they involve limited intervention to the existing structures and are not contentious with the case officer or conservation officer.

I would however like to share our approach to the proposed extension for the 20th Century Building on the site. This is something that our client asked us to explore as their marketing process was yielding some promising discussions with potential tenants wanting open plan office space and they felt there might be an opportunity to increase this provision in response to the demand.

We spent some time exploring the suitability of adding an additional floor and concluded that not only did the potential exist, but that the addition of a carefully designed mansard roof would dramatically improve the streetscape of Kingston Road. The existing 20th Century Building presents itself as squat in comparison with its neighbours. It is a long building and the lack of a well-proportioned second floor to complement its surroundings makes it more incongruous. We think it sits awkwardly and that the proposals submitted integrate better with its surroundings. We are pleased to see that the conservation officer agrees as they state that the proposals offer *“a more finished appearance”* which is *“in keeping with the town’s wide variety of roofscapes”* and *“an enhancement to the conservation area”*.

Throughout this application there have been objections from properties to the rear of the site, where concerns have been raised surrounding the additional attic storey to the north wing and the potential for overlooking. We have taken these comments seriously, reviewed each in detail and have sought to address instances where our proposals will cause harm to neighbouring properties. This has resulted in changes to the window treatments and the removal of accessible balconies to the rear of the property in order to avoid overlooking. We also re-visited the site and conducted an analysis which has been shared with the case officer surrounding the extent of overshadowing that might be caused by our proposals. This has demonstrated that no additional overshadowing is caused to neighbouring properties. Overall therefore we conclude that this proposal is an enhancement to the broader setting of the conservation area and that where concerns have been raised we have listened and where appropriate adapted the design. We trust therefore that the committee recognises this approach and sees that there is net benefit of this proposal that will ensure a sustainable future for this important town centre heritage asset.

**Item 7d - 20/01219/FUL and 20/02055/LBC: Manvers House, No.3 Kingston Road, Bradford On Avon, BA15 1AB**

**Public Statement 3 – Support – Robert Moore - Custodians**

Our company purchased Manvers House in 2019 and are proud custodians of this heritage asset in the heart of Bradford-on-Avon. In response to market demand, our application proposes two key changes:

Firstly, we propose adding a storey on the 20th century building, increasing open plan office provision by 35%. It's our aspiration that this extended building will be a commercial hub in the heart of Bradford-on-Avon, which will continue the town's tradition of attracting innovative businesses.

Secondly, we propose reinstating the original purpose of the older buildings with cellular floorplans to two attractive residential dwellings. We acknowledge this is the reason our application has been called to committee and I therefore request the committee considers the following four points:

1. Were it not for its classification as a listed building, the residential conversion would be treated as permitted development. Listed buildings are only exempt from permitted development rights to avoid unsuitable conversions which could harm their heritage value. In this case the conservation officer has stated that the building is "suited to residential use" and therefore we argue there is no case for rendering Manvers House as unsuitable for residential conversion.
2. Historic England state in paragraph 32 of their publication "Enabling Development and Heritage Assets" that the original use of a heritage asset is likely to be the most appropriate use. Manvers House was originally designed as a residential dwelling and therefore refusing planning permission will be contrary to their guidance.
3. In response to the councillor's call-in, we support the desire to retain a commercial vibrancy within Bradford-on-Avon, hence our proposal to increase the open plan office provision, which is more desirable than the unwanted cellular space that we propose for conversion. Given our commitment to delivering more high-quality office space, we question the wisdom of those objecting and argue that our proposals improve the town's office provision rather than diminishing it.
4. We encourage the committee to consider what possible future exists for the Georgian House on the site if these plans are refused. We are confident after recent discussions with prospective tenants that the 20th century building could soon be occupied, but see no alternative future for the older buildings, which have been vacant for six months and have no prospective commercial tenants after more than 12 months of marketing. If you decide that the building's original residential use is unsuitable, it will impose a very uncertain future on this heritage asset.

**Item 7d - 20/01219/FUL and 20/02055/LBC: Manvers House, No.3 Kingston Road, Bradford On Avon, BA15 1AB**

**Public Statement 4 – Support – Colin Scragg – Marketing Agent**

This statement is from Colin Scragg FRICS – Partner on behalf of Carter Jonas LLP the marketing agents for the subject property.

Carter Jonas were appointed by the Osborne Group in June 2019 to market Manvers House with the intent of finding either a new commercial tenant or series of commercial tenants to lease the building once Hitachi vacated in January 2020. A set of in house particulars were prepared and the property has been listed on our website alongside a number of recognised commercial property portals. We have also mailed the property details to applicants on our database, commercial agents and a number of larger office occupiers within the immediate area.

Despite the uncertainties of Brexit and Covid-19, there has been reasonably strong interest from commercial tenants for the 20th Century building. Four prospective tenants have approached us with interest in this part of the building and a further tenant has approached the building owner directly. All have been attracted by this building's open plan nature, the specification on offer and the size of floorplates available.

Conversely, we have received no direct interest from any potential tenants for the older buildings on the site proposed for residential conversion. The only interest that has been registered was from a local group seeking to operate a co-working facility across the entire site, who were corresponding with the building owner directly. The building owner has however kept us informed of these discussions, shared all correspondence with us and relied on our advice and extensive benchmarking information to guide discussions on rent. These discussions lapsed following discussions with the group's backers, whose rent expectations turned out to be drastically lower than both our local benchmarks and the figures that were acceptable to the aforementioned parties interested in the 20th Century Building. I also note from correspondence between the owner and the group's backers that a substantial rent discount was offered in the hope that it would facilitate an expedient lease agreement. This however resulted in the group's backers confirming that they were not in a position to proceed.

Based on our experience of the past 13 months, I would suggest that there is little prospect for the older buildings on the site receiving interest from potential tenants, given that the general trend is for open floorplates rather than cellular plans. I would however be hopeful of negotiating a lease agreement on the 20th century building which responds better to the needs of commercial tenants.

**Item 7d - 20/01219/FUL and 20/02055/LBC: Manvers House, No.3 Kingston Road, Bradford On Avon, BA15 1AB**

**Public Statement 5 – Objection – Cllr Alex Kay – BoA TC**

Manvers House, 3 Kinston Road

Alterations and extensions to existing office building including erection of mansard storey on north wing; change of use of central building and southern wing from B1 offices to form 2 dwellings (C3)

In assessing the effects of Covid-19 it is even more essential to ensure that workspace in the town is not further reduced as the town seeks to achieve genuine sustainability. The need to reduce car-based commuting has also been highlighted which brings an essential benefit in improving air quality.

Policy H1 of the Bradford on Avon Neighbourhood plan includes a requirement that development should not adversely affect the amenity of neighbouring properties. The Council is aware of the representations made by property owners in Kingston Road, Mill Lane and Silver Street and supports their objections. The scheme is deficient in that the problems of overlooking and overshadowing have not been properly addressed. The photographs included in the application pack pre-date the construction of the terrace of houses in Mill Lane and are misleading

There is insufficient information on the use of materials and details. In particular the metal sheeting to the proposed Mansard roof is not specified and therefore its acceptability in the conservation area and compatibility with the adjoining grade II\* listed building cannot be assessed. Details are also required of the proposed replacement timber windows.

BOATC further request that the planning officer takes into consideration all the comments received from residents and elsewhere as recorded on the planning comments portal as there is an explicit proposal to use this space as a commercial space.