

<b>Date of Meeting</b>	19 August 2020
<b>Application Number</b>	20/01219/FUL and 20/02055/LBC
<b>Site Address</b>	Manvers House, No.3 Kingston Road Bradford On Avon BA15 1AB
<b>Proposal</b>	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).
<b>Applicant</b>	Mr Moore
<b>Town/Parish Council</b>	BRADFORD ON AVON
<b>Electoral Division</b>	Bradford on Avon South - Councillor Sarah Gibson
<b>Grid Ref</b>	382740 - 160964
<b>Type of application</b>	Full Planning
<b>Case Officer</b>	Steven Sims

### Reason for the application being considered by Committee

This application was deferred at the 22 July Western Area Planning Committee to enable the Councillors to attend a site visit. Councillor Gibson has requested that the two applications at Manvers House be called-in for the elected members of the committee to determine should officers be minded to approve planning permission and listed building consent for the proposed development citing the following concern:

- The proposed change of use to residential is contrary to the neighbourhood plan.

### 1. Purpose of Report

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be approved.

### 2. Report Summary

- Principle of development
- Impact on the setting of the listed building/Conservation Area/adjacent listed buildings
- Impact on the living conditions of adjacent residents
- Highway issues/Parking
- Other issues

### 3. Site Description

Manvers House is a grade II\* listed building located within the settlement limits of Bradford on Avon and within the Bradford on Avon conservation area. The building consists of three main elements namely: the principal three-storey central building built in Bath stone - parts of which date back to the 17th century, a single storey 19th century addition built off the southeast elevation and a two-storey modern 20th century office development adjoining the northwest elevation.

The existing front elevations facing Kingston Road are detailed by way of a street elevation plan on the following page, with site photos and location plans providing some local context.



Manvers House - Existing front elevation as seen from Kingston Road

As can be seen for the following photos there is an obvious separation between the listed element of the main central 3 storey building and the 20th century modern office development:

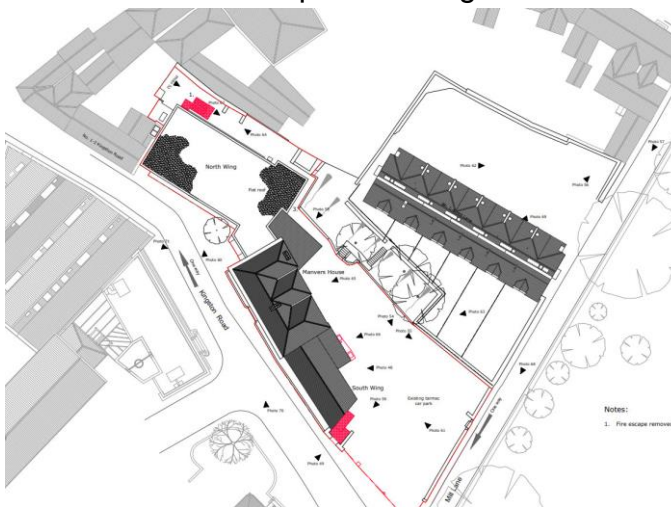


Photo of modern 20th century addition - Manvers House

Photo of 17th century main building - Manvers House

The listing refers mainly to the three storey and single storey elements of Manvers House. The property fronts Kingston Road and has a car park to the side that stretches round to the rear that can accommodate approximately 23 cars. A tree that is subject to a Tree Preservation Order is positioned directly to the north of Manvers House within the grounds of No. 6 Mill Lane.

Manvers House site plan existing



Manvers House aerial photo





There are a number of listed buildings near to Manvers House which are illustrated above as hatched properties. The building is located within the centre of Bradford on Avon where there are a variety of uses including residential, retail and commercial.

#### 4. Planning History

19/04593/LBC - Works to enable the building to be subdivided into three smaller office buildings – Approved 01.08.2019

W/08/000918/LBC - Conversion of Manvers House to form 6 dwellings and one office suite (Class B1) and erection of 7 new build dwellings and associated works – Refused 10/09/2008 for the following reason:

*1. The application as submitted is considered to result in harm to the character of the listed building by reason of loss of historic fabric and new partitions resulting in poor proportional arrangements with regard to windows and fireplaces. As such the proposal is contrary to advice in PPG15, Structure Plan Policy HE7 and Policy C28 of the West Wiltshire District Plan Policy 1st Alteration (2004).*

W/08/00917/FUL - Conversion of Manvers House to form 6 dwellings and one office suite (Class B1); and erection of 7 new build dwellings, and associated works – Refused 10/09/2008 for the following reasons -

1. *In the opinion of the Local Planning Authority the available evidence does not justify the loss of the existing employment land at the Manvers House Site. The loss of such employment land is contrary to Policy E5 of the West Wiltshire District Plan Policy 1st Alteration (2004).*

2. *The proposed conversion of the main section of the Listed Building into a six-bedroom residential dwelling lacking associated private useable amenity area commensurate with the scale of the property would result in a cramped form of development to the detriment of the amenities of the future occupiers of the dwelling. As such the proposal would be contrary to Supplementary Planning Guidance Residential Design Guide and Policy C31a & H24 of the West Wiltshire District Plan Policy 1st Alteration (2004).*

3. *The creation of 13 dwellings on the site generates demand for additional primary school places in the locality. The submitted application does not include any mechanism for the provision of such facilities and as a result is contrary to the requirements of Policy DP2 of the Structure Plan and Policy S1 of the West Wiltshire District Plan Policy 1st Alteration (2004).*

4. *The creation of 13 dwellings on the site generates demand for public open space provision in the locality. The submitted application does not include any mechanism for the provision of such facilities and as a result is contrary to the requirements of Policy R4 of the West Wiltshire District Plan Policy 1st Alteration (2004).*

The above cited 2008 refused applications sought to convert Manvers House into 6 dwellings (including 4 flats within the 20th century modern section) which would have resulted in the loss of almost all the employment floor space, save for the one B1 office space.

W/94/00670/LBC – Internal modifications and general upgrading together with limited external repairs/reinstatement to building 90/91 – Approved 29.09.1994

## **5. The Proposal (application 20/01219/FUL and 20/02055/LBC)**

5.1 Application 20/01219/FUL is a full application seeking permission to change the use of the main 17th century central part of Manvers House into a 6-bedroom dwelling, to change the use of the single-storey 19th century addition into a 3-bedroom maisonette and to construct a third floor onto the 20th century northwest block, to provide office use. Minimal alterations are proposed to the exterior of the 17th century main house under this application which would leave the essential character and appearance unchanged. The 6-bedroom dwelling would have the bedrooms at the first and second floor levels and a living room, kitchen and dining room on the ground floor level. The dwelling would have an area of private amenity space to the rear measuring approx 114 square metres, a bin store and 2 allocated parking spaces within the car park. The 3-bedroom maisonette would have the bedrooms on the ground and first floor levels and a kitchen, living room/dining room at ground floor level. This unit would have one dedicated parking space to the rear and would have access to a small courtyard measuring approx 18 sq. metres for amenity purposes. This courtyard would also accommodate a small cycle store (2 cycles) and a bin store. The proposed roof addition to accommodate an additional 158sqm of office floor space would have a mansard roof that would retain and increase the provision of modern office space. The roof would extend the height of the north block by approx 3 metres. 7 parking spaces are proposed in the courtyard to the east of the main building to serve the offices and



to the rear of the north block 2 cycle shelters are proposed providing accommodation for 12 cycles.

5.2 Concurrent to the 20/01219/FUL planning application, listed building consent is sought under application 20/02055/LBC which seeks approval for the associated works to the listed building to bring about the change of use and for the construction of the third-storey to the northwest block. The listed description is as follows:

*C18. Ashlar frontage, hipped pantiled roof. 3 storeys 7 windows, double-hung sashes, glazing bars (except on ground floor), architrave surrounds. End windows on ground floor have triangular pediments on moulded stone brackets. Simple moulded cornice with plain parapet, plain string at 2nd floor window sill level and heavy moulded and dentilled cornice at 2nd floor level. Cut-stone brackets between window architraves and both cornices. Central doorway with semi-circular head, 6-panelled door and fanlight. Door opening heavily rusticated, with triple keystone and imposts. Tuscan half-columns, rusticated with square blocks, architrave, plain frieze and moulded and dentilled cornice. Single-storey extension to right with stone-tiled roof, 4 windows, 3 light casements with stone mullions and flat drip moulds.*

*Nos 3, 6 and 9 together with the section of wall and gatepiers at the Hall form a group*

5.3 Works within the 17th century main house include - modern openings forced though into the north wing would be sealed off, the modern corridor partitions and office kitchen fittings would be removed, and a new opening is planned to the kitchen area to provide access into the garden terrace area. Within the 19<sup>th</sup> Century annex the following alterations are proposed - the modern ceiling would be removed, and a new staircase would be constructed to access the loft space while the existing entrance block would be extended to provide additional internal space with new roof lights being proposed.



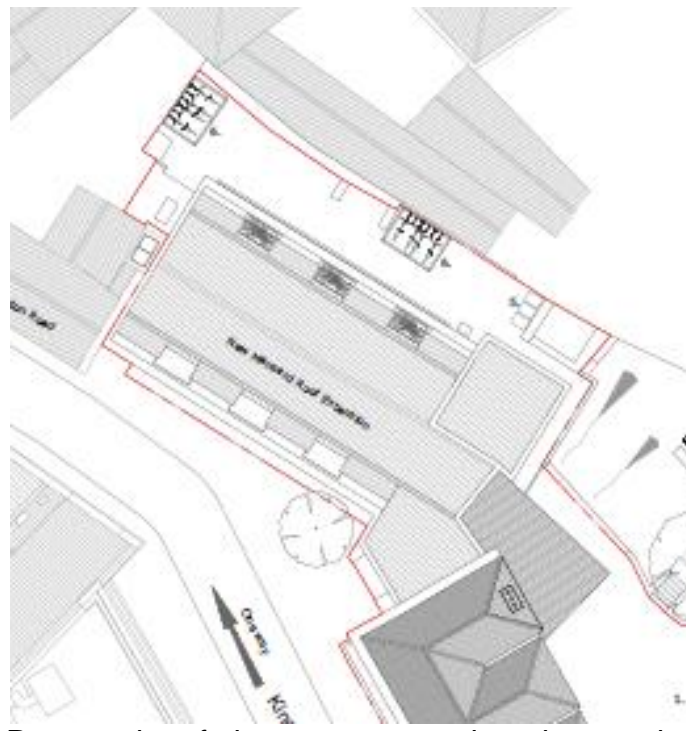
Proposed Street Elevation  
1:100

Proposed front elevation



Proposed Rear Elevation  
1:100

Proposed rear elevation



Proposed roof plan new mansard northwest wing

## 6. Planning Policy

Wiltshire Core Strategy (WCS) - Relevant policies include: Core Policy 1: Settlement Strategy; Core Policy 2: Delivery Strategy; Core Policy 3: Infrastructure requirements; Core Policy 7: Spatial Strategy – Bradford on Avon Community Area; Core Policy 35: Existing Employment Land; Core Policy 41: Sustainable construction and low-carbon energy; Core Policy 51: Landscape; Core Policy 57: Ensuring high quality design and place shaping; Core Policy 58: Ensuring the Conservation of the Historic Environment; Core Policy 60: Sustainable Transport; Core Policy 61: Transport and Development; Core Policy 62: Development impacts on the transport network

West Wiltshire District Local Plan (saved policies) TC1 Upper Floor Uses in Town Centres

The made Bradford on Avon Neighbourhood Plan (BOANP) – especially Policies BE1, E1 and T2

Supplementary Planning Guidance and Wiltshire Local Transport Plan 2011- 2026

National Planning Policy Framework 2019 (the Framework) – especially chapters: 2. Achieving Sustainable Development; 5. Delivering a Sufficient Supply of Homes; 9. Promoting Sustainable Transport; 12. Achieving Well-Designed Places; and 16. Conserving and Enhancing the Historic Environment

## **7. Summary of consultation Responses**

Bradford on Avon Town Council: Objects for the following reasons:

Retention of existing employment sites is vital to the future of Bradford on Avon. The Bradford on Avon Neighbourhood Plan seeks to stimulate, secure and protect economic activity in the town through retaining existing employment sites and creating new by encouraging commercial activity in the town centre and this site is historically a key component of the town's economy.

The Wiltshire Council Adopted Core Strategy strongly supports the retention of employment in the town and Core Policy 35, *Existing Employment Sites* and Core Policy 36 *Economic Regeneration* are relevant considerations.

Similarly the National Planning Policy Framework 2019 seeks to ensure sustainable development as being economic, social and environmental as an integral whole.

At the local level reducing outward commuting can contribute to improving the traffic problem in the town and the retention of employment will aid the town's economic performance. In housing terms the allocation for the town to 2026 has been achieved.

Manvers House is a key employment site in Bradford on Avon with the potential to attract a level of activity similar to that that has just be re-allocated to Kingston Farm. Unlike other employment spaces it has the attraction of adequate private parking.

Insufficient justification has been submitted to support the change of use and the Town Council urges Wiltshire Council to refuse the application.

Bradford on Avon Preservation Trust: Objects for the following reasons:

This interesting and historic building was used for many years, since Avon Rubber left the site, by Hitachi and that clearly indicates that it was attractive to a high-profile company for commercial use. We need more employment opportunities in the town, not less.

Despite the retention and extension of part of the commercial building at the site, the proposals would result in a significant net loss of commercial floor space as a result of the change of use of a principal portion of the property to residential use.

The Bradford on Avon Neighbourhood Plan seeks to stimulate, secure and protect economic activity in the town through retaining existing employment sites and creating new by encouraging commercial activity in the town centre.

It is important that employment provision is maintained within the town to support the local economy. It is critical to the continued vibrancy of Bradford on Avon as a commercially successful town. The proposed change of use would harm the local economy and be to the detriment of the vitality and viability of the town centre which already contains a mix of different uses.

Moreover, there is more than adequate parking provision for a commercial property.

We therefore object to this application which would result in the loss of a commercial use for which insufficient justification has been submitted. No evidence other than a glossy marketing brochure has been submitted that would indicate that the site has been fully marketed for commercial use.

Regarding the principal listed building we would point out that the interior of this historic building has been much altered in the past to the detriment of its character and integrity. However, there is no reason why historic features could not be preserved and reinstated as part of scheme for employment use.

The proposals would be contrary to the Bradford on Avon Neighbourhood Plan and to the Wiltshire Core Strategy and should be refused.'

The Council's Conservation Officer: No objection subject to conditions.

This is a Grade II\* listed building in the centre of Bradford on Avon in the Conservation Area and surrounded by other listed buildings. The significance of the listed building lies in its fine architectural detailing and its historic fabric. It's plan form has changed gradually over the years, but the central listed building has retained much of its internal character. The significance of the Conservation Area and the settings of the surroundings listed buildings relies on the historic street pattern and the built environment that together contributes to the character of the historic industrial working town.

Alterations to the existing extension - The listed building has an attached extension forming a modern set of offices. This extension would be separated off from the main listed building internally and would become essentially a separate building. This extension is not of high architectural quality or materials although the facing blocks do respect the colour of the local stone. The proposal to add a mansard roof to this part of the building would result in a more finished appearance overall and would remain subservient to the main listed building. The use of a mansard behind a parapet is in keeping with the town's wide variety of roof types and would not conflict with other features of the street scene within the Conservation Area. The replacement of the existing windows with new alternatives would also enhance the appearance of this part of the building.

Works to the main building - The conversion of the main listed building and its southern historic addition into two dwellings is compatible with the character of the this listed building. Whilst it has been in commercial use for long periods of its life, it is suited for residential use. The works to the main listed building internally mainly consists of blocking door openings to divide the buildings, adding some minor internal partitioning and adding kitchen and bathroom facilities. These are uncontroversial works that would not result in harm to the character or fabric of the listed building. The plan form would be somewhat restored, albeit with minor partitioning added. Joinery details have been submitted and these are acceptable. The most impactful alteration would be the replacement of the majority of the roof structure to the south wing. The existing roof structure is a set of simple trusses with struts – a Victorian mix of timbers that have been increasingly propped and supported by newer timbers over the years.



The roof structure has failed and been subsequently repaired, supported and propped and it is at the point where further repairs become difficult. This scheme proposing the change of use is an opportunity to address the problem fully and result in a complete roof structure to take the building into its next phase of life.

Conclusion - For the north existing extension the proposal would result in an enhancement to the Conservation Area and the setting of the listed building due to the new windows and the additional storey. The main listed building would be maintained almost as is, only minor changes, resulting in a neutral impact to its historic fabric and character. The south wing would have some loss of historic fabric, but this is fabric at the end of its useful life and the opportunity is here to safeguard the wider structure for the future. Therefore, I have no objections to this scheme.

Economic Development Team: Objects for the following reasons (with a caveat):

Manvers House is located in Bradford on Avon's town centre. This is a Grade II listed building which provides high-quality, central office space in the town benefiting from parking to the rear. It is centrally located, close to amenities and services and very accessible. It helps to provide with employment opportunities in the Town Centre for its residents and supports the local economy.

CP35 states that it is important to retain existing employment uses outside the Principal Employment Areas to maintain diversity and choice of sites for employers and allow for local business expansion.

This site supports the Council's strategic objective to deliver a thriving economy by providing employment space and thus helping to provide a range of job opportunities in Bradford on Avon.

Residential development on this site would therefore be contrary to the objectives underpinning CP35.

Objective 3 of the Bradford on Avon Neighbourhood Plan seeks to stimulate, secure and protect economic activity in Bradford on Avon through a process of retaining existing employment sites and providing new opportunities. One key issue this objective is meant to help tackle is the need to minimise the continued loss of employment land to housing.

Residential development on this site would therefore be contrary to the objectives underpinning Objective 3 of the Neighbourhood Plan.

Wiltshire Council's Economic Development Team therefore objects to the proposals.

However, it should be appreciated that adopted Wiltshire Core Strategy CP35 does allow for changes of use and loss of employment floor space if evidenced that the property is no longer commercially viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (of at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account the prevailing market conditions.

Highways Team: No comments.

Drainage Team: No comments

Historic England: No comments

## **8. Publicity**

This application has been publicised via press advertisement and site notices and individual posted letters that were sent to all neighbouring properties within close proximity of the site. As a result of the publicity, 15 representation letters have been received raising the following concerns:

- The submission has factual inaccuracies and inaccurate plans
- The development would cause overlooking/loss of privacy to neighbouring residents and loss of light/sunlight/overshadowing and the officer's committee report analysis is not accepted by third parties
- There would be an overbearing impact
- The development proposes poor use of materials and would not preserve or enhance the character of the conservation area
- The new roof addition is of poor design
- There would be adverse impact on trees
- The development would have an adverse impact on nearby heritage assets
- Loss of employment floorspace - contrary to made Neighbourhood Plan
- Loss of parking
- The marketing exercise is criticised and is considered 'out of date' with third party objector claiming there is a viable commercial future for the property
- Inadequate level of private amenity space for future occupiers
- No 'notice of intention' has been volunteered pursuant to the Party Wall Act
- Manvers House was never solely residential
- Loss of views

## **9. Planning Considerations**

### 9.1 Principle of Development

9.1.1 Conversion to residential use - The site lies within the town settlement boundary of Bradford on Avon with the adopted Wiltshire Core Strategy defining Bradford on Avon as a Market Town. Core Policy 2 asserts that within the limits of development within market towns, there is a presumption in favour of sustainable development.

9.1.2 Loss of employment floor space - The development proposes the change of use of the main 17th century central 3 storey building and southern 19th century wing from B1 office use to residential use (extending to approx. 476 square metres). The scheme also proposes the erection of a mansard floor addition to the northern wing of the building for B1 office use (providing approx. 158 square metres) which would, provide for approx. 635 square metres of office floor space for commercial use (note: the existing floorspace measures 953 square metres).

9.1.3 With the proposed residential considered, the scheme would result in a net loss of approx. 318 square metres of office floorspace overall.

9.1.4 Objective 3 of the Bradford on Avon Neighbourhood plan states - *'to stimulate, secure and protect economic activity in Bradford on Avon through a process of retaining existing employment sites and providing new opportunities. Also, to encourage appropriate commercial activity in the town centre to support the day and evening economy and to encourage the diversification of rural businesses including the use of redundant rural buildings for alternative employment uses.'*

9.1.5 Due to the change of use to residential, employment use on site would be reduced, however the employment site is not being lost. In addition, by allowing the erection of the mansard roof to the main 20th century office block, the site becomes more suitable for modern office use because the floorspace being lost is the less commercially viable 17th century main building and later 19th century addition which are considered unsuited for modern business needs. The change of use would also allow the preservation of the listed building in its current form.

9.1.6 Policy E1 of the Bradford on Avon Neighbourhood Plan goes onto state that: *'Sustainable business and employment development within or adjacent to Bradford on Avon will be supported.'*

9.1.7 The site is located within the centre of Bradford on Avon which is considered to be highly sustainable with very good public transport links. The train station is located approx. 1/4 mile away, and although limited, there are some public car parks nearby. Officers consider the development complies with Policy E1 of the made neighbourhood plan.

9.1.8 Adopted WCS Policy CP7 – which is the Community Area Policy for Bradford on Avon is supported by paragraph 5.35 which states that:

*“the economic self-containment of Bradford on Avon will be addressed through delivering employment growth as part of strategic development and retaining all existing employment sites”;*

And,

*“the loss of employment land in Bradford on Avon will not be supported, in accordance with Core Policy 35. New employment development, in addition to the strategic allocation, will be supported. This will help address the historic loss of employment land in the town due to market forces and the attractiveness of Bradford on Avon to retired people, second home owners and commuters, which have exerted pressure on former employment sites in the town to be converted to residential use”*

9.1.9 Adopted WCS Core Policy 35 'Existing Employment Land' moreover states that:

*“Within the...Market Towns (e.g. Bradford on Avon) ...proposals for the redevelopment of land or buildings currently or last used for activities falling within use classes B1, B2 and B8 must demonstrate that they meet, and will be assessed against, the following criteria:*

- i. The proposed development will generate the same number, or more permanent jobs than could be expected from the existing, or any potential employment use.*
- ii. Where the proposal concerns loss of employment land of more than 0.25 ha in the Principal Settlements, Market Towns or Local Service Centres it is replaced with employment land of similar size elsewhere at that settlement.*
- iii. It can be shown that the loss of a small proportion of employment floorspace would facilitate the redevelopment and continuation of employment uses on a greater part of the site, providing the same number or more permanent jobs than on the original whole site.*
- iv. The site is not appropriate for the continuation of its present or any employment use due to a significant detriment to the environment or amenity of the area.*
- v. There is valid evidence that the site has no long term and strategic requirement to remain in employment use; the ability of the site to meet modern business needs must be considered, as well as its strategic value and contribution to the local and wider economy both currently and in the long term. It must be shown that the site is no longer viable for its present or any other employment use and that, in addition, it has remained unsold or un-let for a substantial period of time (at least 6 months), following genuine and sustained attempts to sell or let it on reasonable terms for employment use, taking into account prevailing market conditions.*
- vi. The change of use is to facilitate the relocation of an existing business from buildings that are no longer fit for purpose to more suitable premises elsewhere within a reasonable distance to facilitate the retention of employment.”*

9.1.10 Taking each of these criteria in turn:

In terms of criteria i) the scheme proposes a net loss of approximately 33% of the office space in the building. However, the office space to be lost consists of the main 17th century building and later 19th century addition which has proven difficult to let and is considered less commercially viable. The remaining office space (approx 635 sq. metres) would be located in the modern 20th century wing of the building and would be of sufficient size to accommodate between 30-40 employees depending on floorspace to employee ratios. The offices remain vacant and the new mansard roof would increase the amount of modern open plan office space which is considered to be more commercially viable and less likely to remain vacant.

9.1.11 Criteria ii) as listed above, is not relevant to this case due to the size criteria.

9.1.12 In terms of criteria iii) the proposed development to convert the listed building to residential use would, in the words of the conservation officer '*safeguard the wider structure for the future*' and facilitate the continued use of the site for employment uses. Allowing some of the office space on site to be converted to residential would help deliver the remaining employment area which otherwise may remain vacant. However, it is recognised that the change of use would decrease the amount of office floorspace overall.

9.1.13 In terms of criteria iv) the scheme does seek to retain some office floorspace and the mansard roof addition would not result in substantive harm to the amenities of adjacent residents. This issue is considered in more detail within section 9.3 'Impact on the living conditions of adjacent residents' later on in this report.

9.1.14 In terms of criteria v) the applicants have submitted a marketing report in support of their application which confirms that the building is currently vacant and has been marketed by Carter Jonas since June 2019. The report states that the majority of enquiries related to the occupation of the modern office block. The report concludes by asserting that

*'It is considered likely that tenants will be found for the modern block but not for the historic buildings due to the cellular nature of the accommodation they provide'.*

The property was listed on the Carter Jonas website and a number of recognised commercial property portals and mailed to applicants on Carter Jonas database, commercial agents and a number of larger office occupiers within the immediate area. Advertising was targeted towards companies looking for office space ranging between 1,992 and 8,367sq.ft. Interest in response to the marketing has focused primarily on the modern office block with a total of 4 of the 5 enquiries related to this use. However, none of the enquires progressed to letting. Further details on the submitted marketing report can be found in the Appendix attached to this report

9.1.15 Criteria vi) is not relevant in that there is no relocation of any business proposed.

9.1.16 The proposed change of use affects the main 17th century three-storey building and the 19th century single-storey southern annex. Due to the listed status of the building, both of these sections of Manvers House are considered less than ideal for continued office use as confirmed by the marketing report.

9.1.17 Revisions made by Government to permitted development rights in recent years has set out a clear direction to allow for more flexibility in terms of converting commercial property into residential use. The Town and Country Planning (General Permitted Development) (England) Order 2015) as currently amended, allows for the change of use of B1 offices to residential use without the need of planning permission (under Class O of the Order). Whilst this provision does not (at present) extend to this specific case, due to the listed status and the proposed operational development, in recent weeks, the Prime Minister has publicly announced Government plans to radically reform the planning system to introduce greater freedom for buildings and land in town centres to change to residential use, especially where vacant and redundant. The <https://www.gov.uk> website lists the government news articles and includes a press release dated 30 June 2020 titled "PM: Build, Build, Build". Until legislation is passed, we will not know how far the Government will pursue a 'radical' revision to the planning system, but the press release sets out the clear intention of Government to systematically provide additional means by which new homes are delivered – potentially outside of the development management planning control.

9.1.18 NPPF paragraph 81 section d) states that planning policies should: *'be flexible enough to accommodate needs not anticipated in the plan, [and to] allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances'*.



9.1.19 NPPF paragraph 85 section f) moreover states that planning policies should: *'recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.'*

9.1.20 The proposed change of use at Manvers House would constitute a net loss of approximately 318 sq. metres of B1 office floor space which equates to an approximate loss of 33% of commercial floor space within the building. Officers acknowledge that the application breaches the Bradford on Avon Neighbourhood Plan, which through Objective 3, seeks to redress the imbalance between living and working, and to ensure that employment and commercial activity are retained. However, due regard must be given to the caveated requirement set within WCS CP35 and NPPF paragraph 153 where marketing exercise evidence concludes that the ongoing viability of the commercial floor space within the older parts of Manvers House is questionable. This development would not result in the total loss of commercial floor space and from the evidence submitted, officers are satisfied that the loss of approximately 320 square metres of commercial floorspace to be used as residential is justified and would not adversely affect the local economic activity of the town to such a degree that planning permission should be refused.

9.1.21 Moreover, and following the expert conservation advice provided by the Council's conservation officer, officers are mindful of NPPF paragraph 185 which sets out the positives derived from sustaining heritage assets through viable uses rather than have them left vacant.

9.1.22 The proposed roof addition to the main 20th century office wing to the northwest would provide greater flexibility for commercial offices in new open plan floorspace which would accord with objective 3 of the Bradford on Avon Neighbourhood Plan.

9.1.23 The proposed sensitive conversion of the main 17th century building and 19th century southern annex would remove the modern interventions which would deliver a degree of betterment in terms of the interiors of the listed buildings.

## 9.2 Impact on the setting of the listed building/Conservation Area/adjacent listed buildings

9.2.1 NPPF paragraph 193 states 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. ... This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

9.2.2 Paragraph 194 of the NPPF leads on to stress 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."*

9.2.3 Paragraph 196 of the NPPF moreover asserts 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...”*

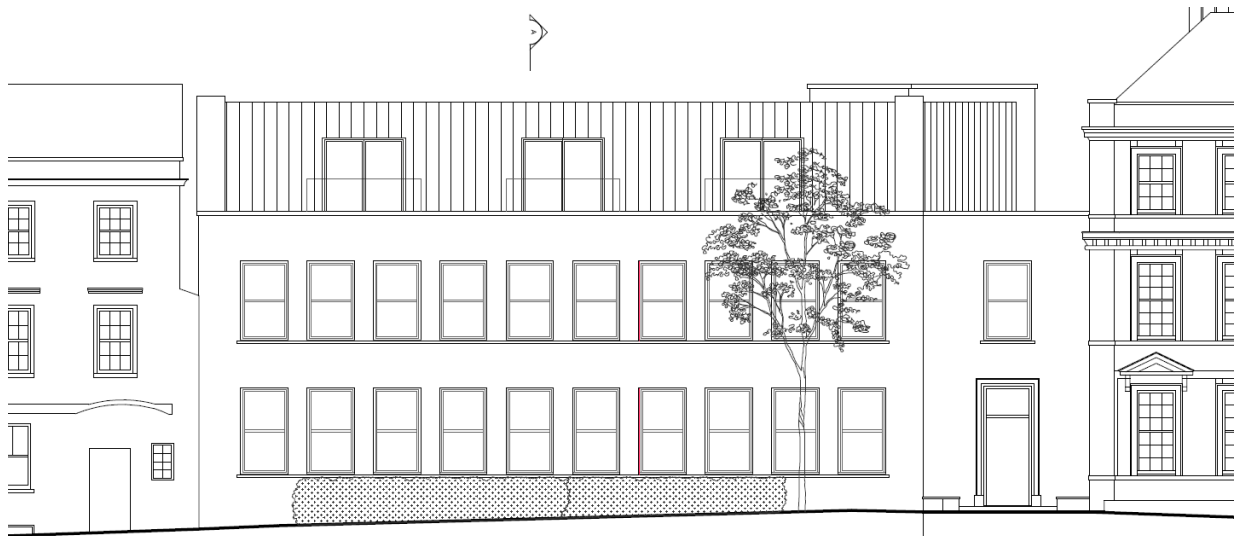
9.2.4 Core Policy 57 of the Wiltshire Core Strategy requires: *“A high standard of design is required in all new developments, including extensions... Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through... being sympathetic to and conserving historic buildings”*.

9.2.5 Whilst WCS Core Policy 58 echoes the above national policy in seeking the protection, conservation and, where possible, enhancement of heritage assets.

9.2.6 Manvers House is a grade II\* listed building located in the centre of Bradford on Avon and within the Bradford on Avon Conservation Area. The significance of the listed building lies in its fine architectural detailing and its historic fabric. Its plan form has changed gradually over the years, but the principal part of the listed building has retained much of its internal character. The significance of the Conservation Area and the setting of the surroundings listed buildings relies on the historic street pattern and built environment that together, contribute to the character of the historic industrial working town.

9.2.7 The conversion of the main listed building and its southern historic addition into two dwellings is considered compatible with the heritage asset. Whilst it has been in commercial use for long periods of the years, it is suited for residential use. The works to the main listed building internally extends to blocking up modern door openings to divide the buildings, adding some minor internal partitioning and kitchen and bathroom facilities. These are uncontroversial works that would not result in causing harm to the character or fabric of the listed building. The plan form would be somewhat restored, albeit with some minor partitioning. Joinery details have been submitted and these have been appraised and accepted by the Council’s conservation officer.

9.2.8 The most impactful alteration would be the replacement of the majority of the roof structure to the south wing. The existing roof structure is a set of simple trusses with struts – a Victorian mix of timbers that have been increasingly propped and supported by newer timbers over the years. The roof structure has failed and been subsequently repaired, supported and propped and it is at the point where further repairs become difficult. This scheme creates the opportunity to address the problem fully and result in a complete roof structure to take the building into its next phase.



**New mansard roof to north block (Kingston Road elevation)**

9.2.9 The listed building has an attached extension referred to as the north block forming a modern set of offices. This extension would be separated off from the main listed building internally and would essentially become a separate building. The current extension is not of high architectural quality or materials although the facing blocks do respect the colour of the local stone. The proposed construction of a mansard roof **(as shown in plan form above)** would result in a more cohesive finished appearance overall that would remain subservient to the main listed building. The use of a mansard behind a parapet would be in keeping with the town's roofscape and would not conflict with other features of the street scene within the Conservation Area. The replacement of the existing windows with new alternatives would enhance the appearance of this part of the building. Overall, the proposed materials are considered acceptable.

9.2.10 The main listed building would be maintained almost as is with only minor changes, resulting in a neutral impact to its historic fabric and character. The south wing would have some loss of historic fabric, but the associated fabric is at the end of its useful life and the opportunity exists to safeguard the wider structure for the future.

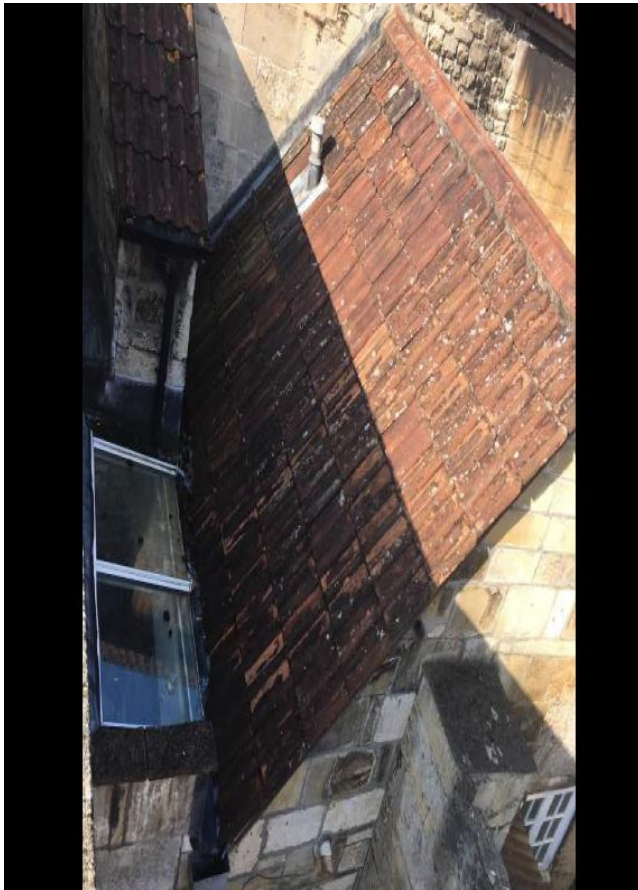
9.2.11 The development would, overall, cause no harm to the heritage assets and the alterations proposed to the modern 20th century addition and southwest 19th century annex, would result in an enhancement and betterment to the character of the conservation area. For the same reasons, the development would cause no harm to the adjacent listed buildings. The scheme therefore complies with WCS Core Policy 58 and the Framework.

### 9.3 Impact on the Living Conditions of Adjacent Residents

9.3.1 WCS Core Policy 57 titled: 'Ensuring High Quality Design and Place Shaping' requires development to have regard to the compatibility of adjoining buildings and uses, the impact achievable within the development itself, including the consideration

of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).

9.3.2 A number of residential properties border the application site or are located nearby, including No's 1-2 Kingston Road to the west, No.24 Silver Street to the north and No's 1 to 6 Mill lane to the northeast.



**Photo of rooflight No. 1-2 Kingston Road**

9.3.3 In terms of neighbouring impacts to No's 1-2 Kingston Road, a skylight to this property sits adjacent the northwest wing of Manvers House and third parties have complained about a potential loss of light from the proposed third floor extension. The sky light which is shown in the photograph is set within a valley which is already overshadowed by both the existing flank wall of the Manvers House North Wing and No's 1-2 Kingston Road, as can be seen opposite. In addition, as detailed on plans for the conversion of No.1-2 Kingston Road from offices to residential approved in 2000 (under application W/00/00551/LBC) the skylight, located in the northeast corner of the building, serves a first-floor kitchen – which is not a recognise habitable room.

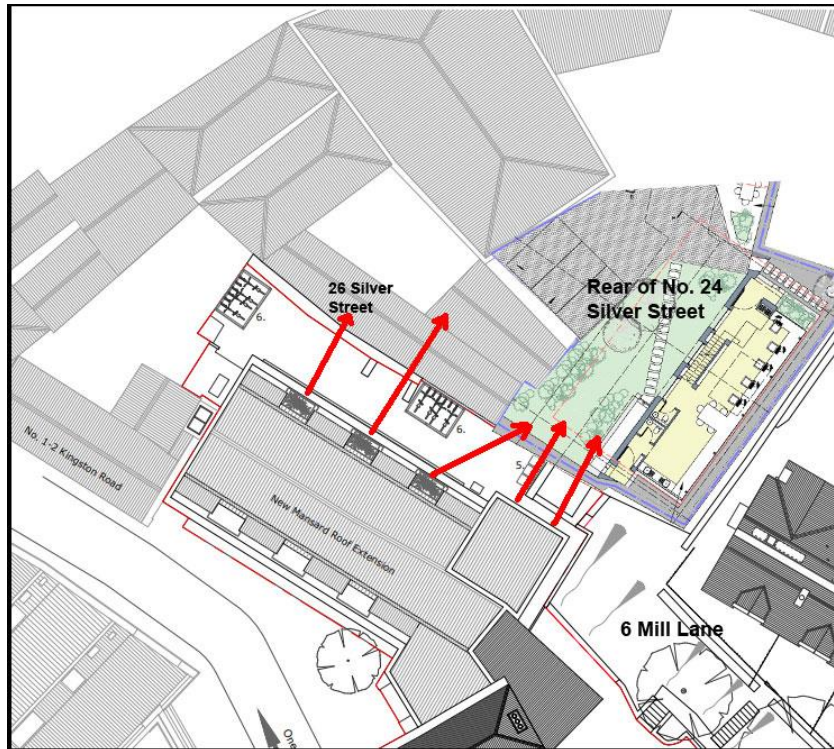
Within a late representation submission, the occupiers of 1-2 Kingston Rd asserted having “direct and unimpeded ‘sun’ light during the sun’s orbit”. The photo proves that Manvers House property casts a

shadow at present, although Officers are pleased to read that the occupiers still have direct sun light and would still benefit form daylight penetrating the skylight after the roof extension is constructed, if approved. This is because a shadow to be cast would depend upon the sun’s orbit. As such, and being mindful of the sun’s orbit, officers submit that the development would not result in significant levels of additional loss of light and the harm caused would not warrant a refusal of planning permission.

9.3.4 Residents at No. 24 Silver Street have complained that the area directly to the rear of their property which forms an area of amenity space following the demolition of the rear outbuilding under application 16/08409/FUL (as detailed on the plan below), would be overlooked by the proposed new mansard roof. Works to the rear of No. 24 Silver Street are currently ongoing. The separation distance from the northern boundary of Manvers House and the southern boundary of this amenity space is approx. 5.5 metres, in addition, due to level changes in the area, this amenity space is located opposite the first-floor level of Manvers House north block staircase. Officers



accept that the mansard window closest to the staircase and windows from the new second floor staircase would result in some overlooking of the amenity area (as detailed in the plan below). However, it should be noted that this amenity space is already directly overlooked by neighbouring properties fronting Silver Street and side windows to No. 6 Mill Street. Consequently, a condition is recommended to be imposed on any planning permission requiring that these three windows to the new mansard and staircase be obscurely glazed. The remaining 2 rear windows of the mansard would overlook an outbuilding to the rear of No. 26 Silver Street and an area of car parking adjacent the amenity space of No. 24 Silver Street (detailed in the plan below).



**New mansard to north wing and relationship with adjacent properties**



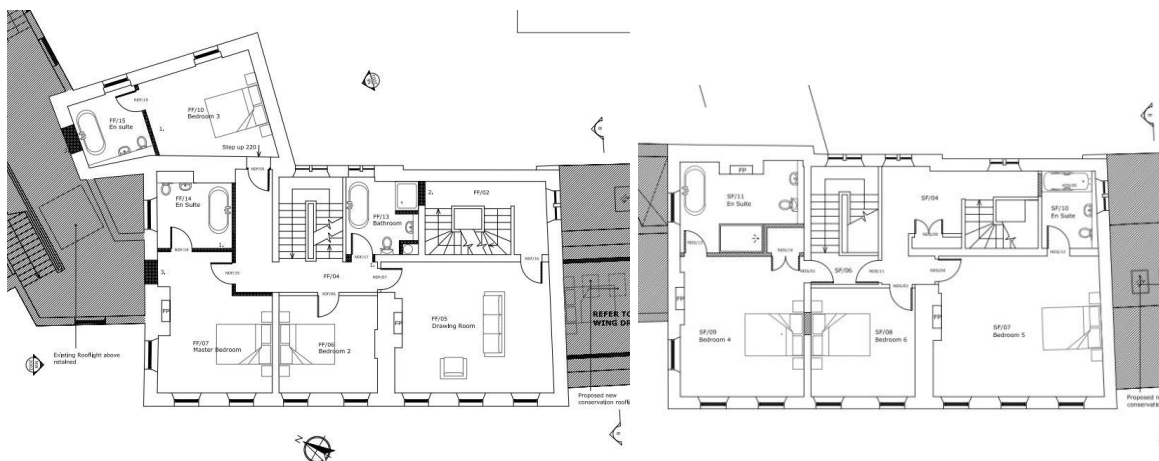
**Photo from rear of No. 24 Silver Street that would face new roof addition and stairway**



9.3.5 In addition, it is considered that due to the separation distance and limited height of the proposed Mansard roof (approx. 3 metres), the development would not result in substantive loss of light or result in overbearing impact to neighbouring properties and residents, including the amenity space to the rear of No. 24 Silver Street.

9.3.6 The separation distance between the rear elevation of Manvers House and the rear elevation of the properties at Mill Lane is approx. 11 metres (viz. No. 6) and 27 metres (viz No. 3) as the properties angle away from each other. At its closest, the rear boundary of No. 6 is approx 3 metres from the northern boundary of Manvers House while the rear boundary of No. 3 is approx 14.5 metres from the northern/rear boundary of Manvers House. In terms of the impact of the development on properties at Mill Lane it must be stated that these properties are already overlooked by the existing office development and in particular by the windows at the second-floor level. In addition, the rear gardens of No's 1-6 Mill Lane, in particular the southern aspect of the gardens, are already overlooked by rear windows of existing properties fronting Mill Lane.

9.3.7 It is appreciated that with the proposed conversion, the use of Manvers House would change but the number of people potentially looking out of the windows towards the neighbouring properties would be materially reduced. In addition, the application proposal would result in three windows at the second-floor level (facing north) serve non-habitable rooms such as a stairway and hallway. Whilst of the four north facing windows at first floor level, one would serve a stairway and two would serve bathrooms and for those serving the bathrooms, they would be obscurely glazed. The remaining window would serve a bedroom (as detailed in floor plans and photo of existing north elevation below). Although this would result in some overlooking of neighbouring property, in particular the residents at No. 6 Mill Lane, it should be noted that this window is not new and the potential for overlooking from this window already exists.



Main building Manvers House proposed first floor

Main building Manvers House proposed second floor

9.3.8 It is recognised that the southeast facing windows serving the new staircase to the new mansard roof would overlook the rear gardens of properties at Mill Lane, in particular No. 5 and No. 6 Mill Lane (as detailed on the plan of the new mansard roof to the northwest wing above). However, these properties are already overlooked by existing windows serving the offices as detailed in the photos below.

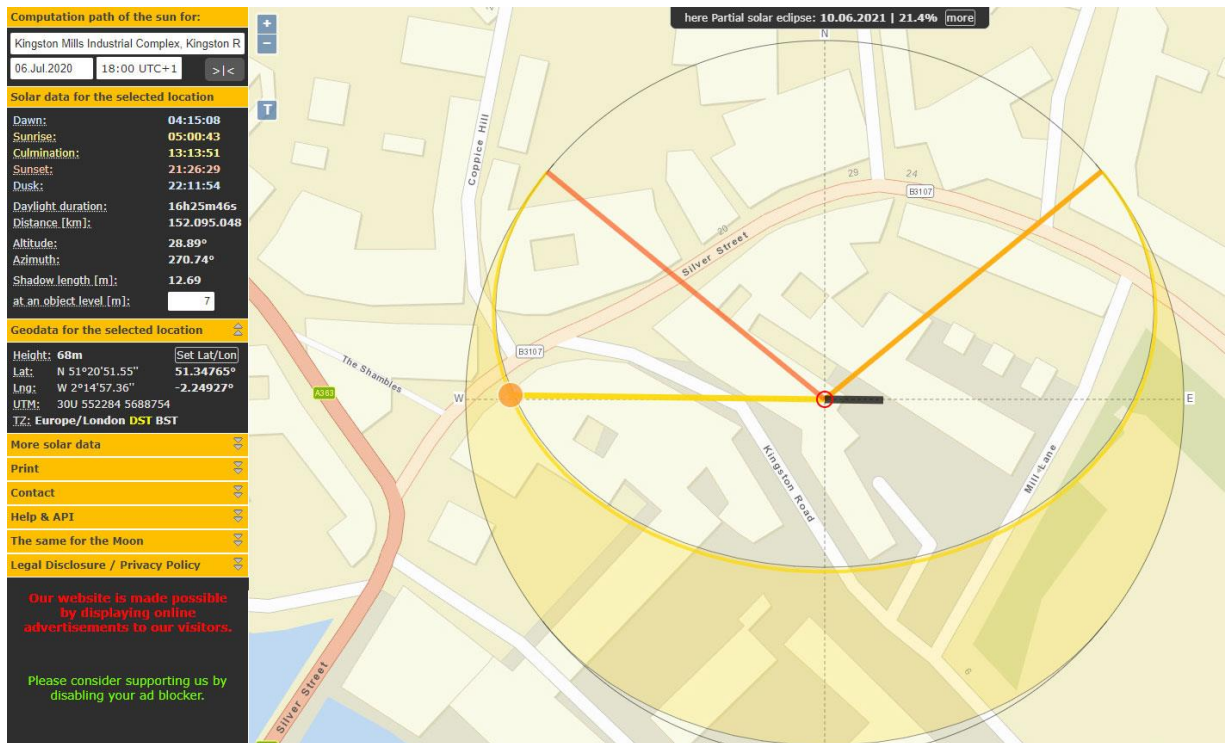


Photos from rear garden of No. 6 Mill Lane towards existing NE and N elevations of Mansard House

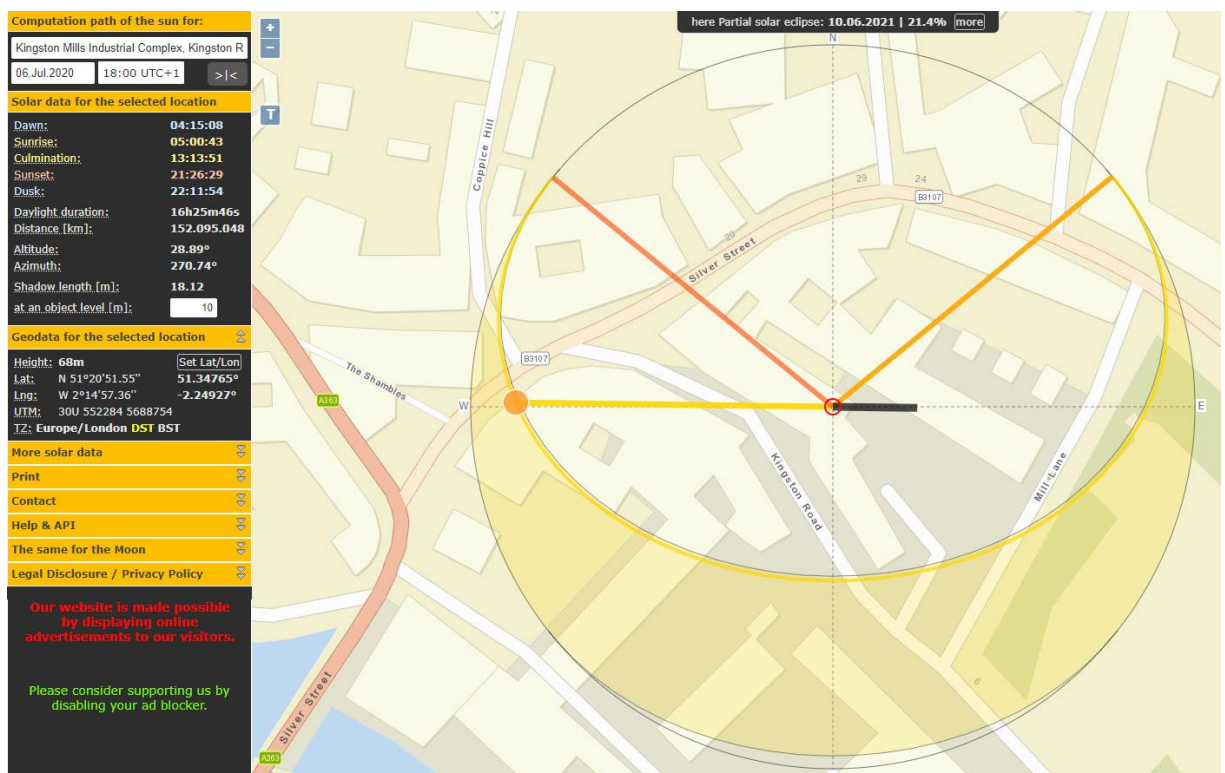
9.3.9 As such it is not considered that the overlooking resulting from the change of use, in particular any overlooking of properties at Mill Lane, would be so detrimental to the living conditions of residents that the application should be recommended for refusal.

9.3.10 A planning condition is however recommended for any approval requiring the new southeast facing second floor windows to be obscurely glazed in addition to the windows in the main central building serving bathrooms.

9.3.11 Specific to the proposed erection of the second-floor stairway (an increase in height of approx. 3 metres) and roof addition, officers have had due regard to the sun's orbit and potential for causing overshadowing and loss of light to the rear garden of No. 6 Mill Lane especially during late afternoon and evenings. However, officers are satisfied that the impacts would be temporary for part of the day/evening and would not result in significant detriment to the living conditions of the residents of No. 6 to justify a refusal of planning permission. As can be seen from the Sun calculation test below taken at 6 pm on a July evening the rear garden of No. 6 Mill Lane is already in shadow, and although the proposed extension to the staircase would increase this overshadowing, it would be limited during the day.



Sun calculation - Impact on rear garden of 6 Mill Lane - Existing height of building

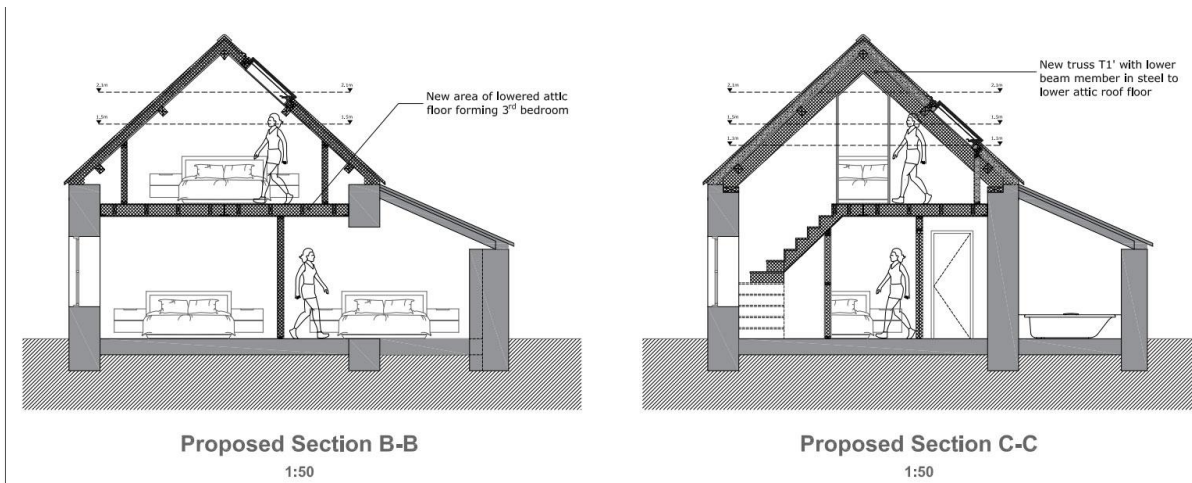


Sun calculation - Impact on rear garden of 6 Mill Lane - Proposed height of building

9.3.12 The scheme proposes new roof lights to the east wing to serve a bedroom and hallway (which is not considered a habitable room) in the first floor of the 19th century conversion however due to the height of the rooflights and/or separation distance from the rear boundaries of properties at Mill Lane and the higher elevation of the



properties at Mill Lane, this aspect would not cause undue harm in terms of loss of privacy or overlooking to neighbouring residents.



9.3.13 Due to the separation distances and juxtaposition of the new mansard roof to the north wing in relation to residential properties at No's 25 to 30 Lamb Yard, there would be no additional overlooking or loss of privacy to residents of these flats.

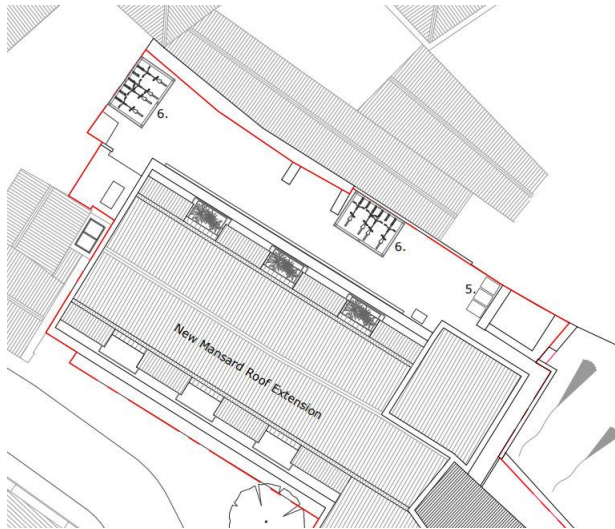
9.3.14 The proposed development would not lead to significant levels of loss of privacy, overlooking or overshadowing to neighbouring residents to warrant a recommendation for refusal, and officers are satisfied that the development complies with WCS Core Policy 57 and the NPPF.

#### 9.4 Highway Issues/Parking

9.4.2 The aim of Objective 6 of the Bradford on Avon Neighbourhood Plan seeks 'to improve the pedestrian environment in the town, encouraging people to walk or cycle rather than use their cars thereby assisting in the improvement of the overall environment and air quality.' Meanwhile, Policy T2 states that 'Development proposals that would result in the loss of public or private parking capacity will not be supported unless they can show that alternative capacity will be provided elsewhere or can show that the proposals will result in a reduction in the need for off-street parking.' However, paragraph 109 of the NPPF states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

9.4.3 The application seeks planning permission for the change of use of part of Manvers House from offices to form a 6-bed dwelling and a 3-bed dwelling in addition to the erection of a mansard roof for office purposes. Currently, the property has 23 off road parking spaces located to the side and rear of Manvers House with access off Kingston Road. The applicant proposes to reduce the total number of spaces to 10 with 2 spaces being allocated to the 6-bed property, and 1 space for the 3-bed property. This would leave 7 spaces remaining for the office use. This would constitute as a Local Transport Plan shortfall of 2 off road parking spaces for the residential use and about 14 spaces for the office use.

9.4.4 Officers acknowledge that there is limited off road parking in the immediate area and would argue that the traffic restrictions found on the surrounding roads would not likely lead to displaced car parking causing a problem to local residents. Instead, with the subject property being considered as a sustainable location, and within short walking distance to public transport links including the train station, the proposed on-site parking deficit is not considered unacceptable, and it is noted that the Council's highway authority has raised no objections.



Proposed cycle shelters

to be constructed and made available prior to occupation. It is proposed 2 cycle shelters accommodating 12 cycle spaces would be located to the rear of the north block as detailed in the following plan. Design of these shelters would also be conditioned.

9.4.6 The reduced amount of parking for the proposed development would not lead to such levels of harm to highway safety in the immediate area as to warrant a recommendation for refusal.

## 9.5 Other Issues

9.5.1 Other issues have been raised by third parties namely criticising the accuracy of the submitted plans and stating the submission contains factual inaccuracies. Officers secured revised plans and details to redress these concerns, and the presented application for member consideration is considered to be of sufficient standard to inform a full and proper assessment which is supported by a detailed design and access statement that contains the marketing exercise and particulars.

9.5.2 Additional concern has been raised by third parties about the level of amenity space available for future occupiers of this development. A rear garden space extending to approx. 114 square metres would be available for the main 6-bed dwelling and a private courtyard extending to approx. 18 square metres would be available for the 3-bed maisonette. There are no adopted plan policies prescribing the size of amenity space for residential development in Wiltshire. Instead, each case must be assessed on its own merits. In this particular case, officers are satisfied that within this town centre location, the proposal is acceptable.

9.4.5 There are some public car parks available in the area, but within a town centre, officers would expect and encourage more people to walk, cycle or use public transport, and consistent with several recent mixed use developments that have been reported to committee in recent times, (e.g. 18/06893/FUL at the Halve clinic in Trowbridge) officers recommend the imposition of a planning condition to secure a travel plan that details how the development would promote sustainable modes of transport as an alternative to relying upon private

motor vehicles. In addition, a condition is recommended to secure cycle shelters



9.5.3 Additional concern has been raised about the impact of the development on a nearby tree (Grey Poplar - see below) that is subject to a Tree Preservation Order (TPO). However, officers are satisfied that the development would not impact on the tree. A condition will be applied to any approval requiring details of tree protection during construction.



TPO Tree (Grey Poplar) located in the rear garden of No. 6 Mill Lane

9.5.4 Third parties have also commented on loss of views however, a loss of a view over other land and property is not a material planning consideration.

9.5.5 Third parties have also argued that no 'notice of intention' has been volunteered by the developer in regard to the Party Wall Act. However, this is a civil legal matter between third parties, and is not a planning issue.

## 10. Conclusion (The Planning Balance)

Manvers House is grade II\* listed building located within the settlement limits of Bradford on Avon and within the Bradford on Avon Conservation Area. The building consists of three main sections; a principal three-storey central building dating back to the 17th century, a single storey 19th century addition erected off the southeast elevation and a 2-storey modern 20th century office development adjoining the northwest elevation.

The proposed development would result in the loss of 320 sq. metres of office floor space, however it is considered this loss would be offset by facilitating the new viable uses of the property which would comprise a mix of residential and continued office/commercial floor space that would not only preserve the listed building, but with the removal of the modern interventions, and the construction of an appropriate well designed new roof, would provide a heritage betterment.

The proposed development would have reduced parking provision however this would be offset to some degree by encouraging use of alternative more sustainable modes of transport and reducing the dependency upon private motor vehicles.

The proposed development would not adversely impact the living conditions of neighbouring residents and the development would cause no harm to the grade II\* listed building or adjacent / nearby listed buildings.

The proposed development would provide 2 additional market dwellings and, with the addition of the new mansard roof, would facilitate the continued use of the site for employment purposes and preserve the listed building in its current form. There would also be some short terms benefits during the construction phase through direct and indirect job creation.

Overall, officers are satisfied that the development should be supported subject to conditions.

**RECOMMENDATION:** APPROVE subject to the following conditions

**Recommended Conditions for planning application: 20/01219/FUL**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

19044\_NP-XX-XX-DR-A-1001-C Location Plan  
19044\_NP-XX-XX-DR-A-1002-D Existing Site Plan  
19044\_NP-XX-00-DR-A-1003-B Existing Ground Floor Plan  
19044\_NP-XX-01-DR-A-1004-B Existing First Floor Plan  
19044\_NP-XX-02-DR-A-1005-B Existing Second Floor Plan  
19044\_NP-01-00-DR-A-1006-B North Wing Existing Ground Floor Plan  
19044\_NP-01-01-DR-A-1007-B North Wing Existing First Floor Plan  
19044\_NP-01-02-DR-A-1008-B North Wing Existing Roof Plan  
19044\_NP-02-00-DR-A-1009-B Main House Existing Ground Floor Plan  
19044\_NP-02-01-DR-A-1010-B Main House Existing First Floor Plan  
19044\_NP-02-02-DR-A-1011-B Main House Existing Second Floor Plan  
19044\_NP-03-00-DR-A-1012-B South Wing Existing and Proposed Ground Floor Plan  
19044\_NP-03-01-DR-A-1013-B South Wing Existing and Proposed First Floor Plan  
19044\_NP-01-00-DR-A-1016-B North Wing Proposed Ground Floor Plan  
19044\_NP-01-01-DR-A-1017-B North Wing Proposed First Floor Plan  
19044\_NP-XX-00-DR-A-1018-C North Wing Proposed Second Floor Plan  
19044\_NP-02-00-DR-A-1019-B Main House Proposed Ground Floor Plan  
19044\_NP-02-01-DR-A-1020-B Main House Proposed First Floor Plan  
19044\_NP-02-02-DR-A-1021-B Main House Proposed Second Floor Plan  
19044\_NP-XX-XX-DR-A-1022-E Proposed Site Plan  
19044\_NP-XX-00-DR-A-1023-B Proposed Ground Floor Plan  
19044\_NP-XX-01-DR-A-1024-B Proposed First Floor Plan  
19044\_NP-XX-02-DR-A-1025-C Proposed Second Floor Plan  
19044\_NP-XX-XX-DR-A-2001-B Existing and Proposed Street Elevation  
19044\_NP-XX-XX-DR-A-2002-D Existing SE Elevation  
19044\_NP-XX-XX-DR-A-2003-D Existing-Proposed Rear Elevation  
19044\_NP-XX-XX-DR-A-3001-A Existing Section A-A  
19044\_NP-XX-XX-DR-A-3002-B Existing and Proposed Sections B-B, C-C and D-D  
19044\_NP-XX-XX-DR-A-3021-C Proposed Section A-A  
19044\_NP-XX-XX-DR-A-4001-B Door Architraves and Skirtings Detail  
19044\_NP-XX-XX-DR-A-4004-B French Door Detail  
19044\_NP-XX-XX-DR-A-4005-A Rooflight Detail  
19044\_T05\_001\_A\_Door Schedule

REASON: For the avoidance of doubt and in the interests of proper planning.

3. No development shall commence on site until a scheme of hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include: -

- a detailed planting specification showing all plant species, supply and planting sizes and planting densities;
- details of methods to protect the tree subject to a TPO located to the rear of 6 Mill Lane during construction works. These methods shall be in accordance with British Standard 5837 (2012): "Trees in Relation to Design, Demolition and Construction - Recommendations" and shall be maintained for the duration of the works;
- means of enclosure;
- all hard and soft surfacing materials;
- minor artefacts and structures (e.g. bin stores, cycle shelters, furniture, play equipment, refuse and other storage units, signs, lighting etc).

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development, protection of existing important landscape features, in the interests of the character and appearance of the Conservation Area and preserving the character and appearance of the listed building.

4. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

5. Before the development hereby permitted is first occupied the windows in the northeast and southeast elevations of the new second floor mansard roof serving the WC and stairway and the eastern most northeast facing window of the new mansard roof serving the new office space and the windows in the north elevation serving the en-suite and bathroom at first floor level of the Main House shall be glazed with obscure glass only [to an obscurity level of no less than level 4] and the windows shall be maintained with obscure glazing in perpetuity.

REASON: In the interests of residential amenity and privacy.

6. No part of the development hereby approved shall be occupied until the parking area shown on the approved plans (Dwg No. 1022 rev E) has been consolidated, surfaced and laid out in accordance with the approved details. The parking area shall provide two parking spaces to be allocated to the new 6-bed dwelling, one space for the new 3-bed maisonette and 7 spaces for the office use. Thereafter, the parking area shall be maintained and remain only available for such use in perpetuity.

REASON: To ensure that adequate provision is made for parking within the site in the interests of highway safety.

7. No part of the office development shall be occupied until the cycle parking facilities shown on the approved plans (Dwg No. 1022 rev E) have been provided in full and made available for use. The cycle parking facilities shall be retained for use in accordance with the approved details at all times thereafter.

REASON: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than the private car.

8. No part of the office development shall be occupied until a Green Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall include details of implementation and monitoring with the results being made available to the Local Planning Authority on request, together with any changes to the plan arising from those results.

REASON: In the interests of road safety and reducing vehicular traffic to the development.

### Informatives

1. The applicant is advised that the development hereby approved may represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. If the development is determined to be liable for CIL, a Liability Notice will be issued notifying you of the amount of CIL payment due. If an Additional Information Form has not already been submitted, please submit it now so that we can determine the CIL liability. In addition, you may be able to claim exemption or relief, in which case, please submit the relevant form so that we can determine your eligibility. The CIL Commencement Notice and Assumption of Liability must be submitted to Wiltshire Council prior to commencement of development. Should development commence prior to the CIL Liability Notice being issued by the local planning authority, any CIL exemption or relief will not apply and full payment will be required in full and with immediate effect. Should you require further information or to download the CIL forms please refer to the Council's Website:

[www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy](http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy)

2. The applicant is advised to make contact with Wessex Water to ensure the site is served by appropriate water and foul water connections.

## **Recommended Conditions for application: 20/02055/LBC**

1. The works for which Listed Building Consent is hereby granted shall be begun before the expiration of three years from the date of this consent.

REASON: To comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

19044\_NP-XX-XX-DR-A-1001-C Location Plan  
19044\_NP-XX-XX-DR-A-1002-D Existing Site Plan  
19044\_NP-XX-00-DR-A-1003-B Existing Ground Floor Plan  
19044\_NP-XX-01-DR-A-1004-B Existing First Floor Plan  
19044\_NP-XX-02-DR-A-1005-B Existing Second Floor Plan  
19044\_NP-01-00-DR-A-1006-B North Wing Existing Ground Floor Plan  
19044\_NP-01-01-DR-A-1007-B North Wing Existing First Floor Plan  
19044\_NP-01-02-DR-A-1008-B North Wing Existing Roof Plan  
19044\_NP-02-00-DR-A-1009-B Main House Existing Ground Floor Plan  
19044\_NP-02-01-DR-A-1010-B Main House Existing First Floor Plan  
19044\_NP-02-02-DR-A-1011-B Main House Existing Second Floor Plan  
19044\_NP-03-00-DR-A-1012-B South Wing Existing and Proposed Ground Floor Plan  
19044\_NP-03-01-DR-A-1013-B South Wing Existing and Proposed First Floor Plan  
19044\_NP-01-00-DR-A-1016-B North Wing Proposed Ground Floor Plan  
19044\_NP-01-01-DR-A-1017-B North Wing Proposed First Floor Plan  
19044\_NP-XX-00-DR-A-1018-C North Wing Proposed Second Floor Plan  
19044\_NP-02-00-DR-A-1019-B Main House Proposed Ground Floor Plan  
19044\_NP-02-01-DR-A-1020-B Main House Proposed First Floor Plan  
19044\_NP-02-02-DR-A-1021-B Main House Proposed Second Floor Plan  
19044\_NP-XX-XX-DR-A-1022-E Proposed Site Plan  
19044\_NP-XX-00-DR-A-1023-B Proposed Ground Floor Plan  
19044\_NP-XX-01-DR-A-1024-B Proposed First Floor Plan  
19044\_NP-XX-02-DR-A-1025-C Proposed Second Floor Plan  
19044\_NP-XX-XX-DR-A-2001-B Existing and Proposed Street Elevation  
19044\_NP-XX-XX-DR-A-2002-D Existing SE Elevation  
19044\_NP-XX-XX-DR-A-2003-D Existing-Proposed Rear Elevation  
19044\_NP-XX-XX-DR-A-3001-A Existing Section A-A  
19044\_NP-XX-XX-DR-A-3002-B Existing and Proposed Sections B-B, C-C and D-D  
19044\_NP-XX-XX-DR-A-3021-C Proposed Section A-A  
19044\_NP-XX-XX-DR-A-4001-B Door Architraves and Skirtings Detail  
19044\_NP-XX-XX-DR-A-4004-B French Door Detail  
19044\_NP-XX-XX-DR-A-4005-A Rooflight Detail  
19044\_T05\_001\_A\_Door Schedule

REASON: For the avoidance of doubt and in the interests of proper planning.



3. Notwithstanding the approved drawings, no works shall commence until details of the following have been submitted to and approved in writing by the Local Planning Authority:

- Samples of external materials
- Large scale details of all external joinery including metal-framed glazing (1:5 elevation, 1:2 section) including vertical and horizontal cross-sections through openings to show the positions of joinery within openings, depth of reveal, heads, sills and lintels;
- Large scale details of all internal joinery (1:5 elevation, 1:2 section);
- Full details of external flues, background and mechanical ventilation, soil/vent pipes and their exits to the open air;
- Details of all new or replacement rainwater goods

REASON: The application contained insufficient information to enable this matter to be considered prior to granting planning permission and the matter is required to be agreed with the Local Planning Authority before development commences in order that the development is undertaken in an acceptable manner, in the interests of preserving the character and appearance of the listed building and its setting.

## Appendix I Copy of Marketing Report produced by Carter Jonas

### The Principle of the Proposed Uses

6.1 The site is within the Bradford on Avon urban area and is considered to be an appropriate location for residential development under Core Strategy policies CP1 and CP7.

6.2 The current B1 employment use is a key consideration in relation to the principle of the proposed conversion of the historic buildings to residential use. In this respect, the buildings are vacant and have been marketed by Carter Jonas since June 2019 through the following marketing channels:

- Particulars – marketing produced (see Appendix 3)
- Property has been listed on the Carter Jonas website and a number of recognised commercial property portals
- Property mailed to applicants on Carter Jonas database, commercial agents and a number of larger office occupiers within the immediate area
- Advertising of the property acknowledges the Listed Building Consent to split the building into a number of smaller office suites and is targeted towards companies looking for office space ranging between 1,992 and 8,367sq.ft.

6.3 Interest in response to the marketing has focused primarily on the modern office block (Figure 1 – building A). There have been five enquiries, four of which relate to the modern block only. However, none have been progressed to letting terms for a variety of reasons, as detailed below:

- 1 Interested in occupation of the whole. A new start-up company without any track record and no guarantors offered. Not progressed due to lack of covenant strength, track record or willingness to offer director guarantees.
- 2 – Party looking for open plan offices of 4,000 sq ft within a 10 mile radius from existing office based north of Bath. Premises discounted due to location from existing office and parking provision.
- 3 – Local based company looking for open plan offices. Viewed modern extension only and whilst premises suited requirement internal issues have meant they are not currently in a position to progress.
- 4 – A local company interested in the modern annex only. They are still interested but are not in a position to sign heads of terms
- 5 – A local company interested in taking a single floor of the modern annex only. They have opted to remain in their existing facility.

6.4 It is considered likely that tenants will be found for the modern block but not for the historic buildings due to the cellular nature of the accommodation they provide. The proposal therefore seeks to increase the amount of modern, open-plan officer space by 130m<sup>2</sup> (1,399 sq ft) through an additional floor to the modern block to provide a total of 503m<sup>2</sup> (5,414 sq ft). The historic elements are to be brought into residential use, more suited to their configuration and character.

6.5 In accordance with the provisions of Core Strategy policy CP35, the proposal therefore retains and expands the modern employment space for which it is considered there is likely to be demand and safeguards the heritage assets, which are unsuited to modern business needs, by bringing them into residential use, in keeping with the original purpose of the principal listed building.

6.6 Overall, it is considered that the principle of the proposed development is in accordance with national and local planning policy.