



Coln House Fairford Gloucestershire

Heritage Statement



Report prepared for: Gloucestershire County Council

CA Project: 6720

CA Report: 18423

October 2020



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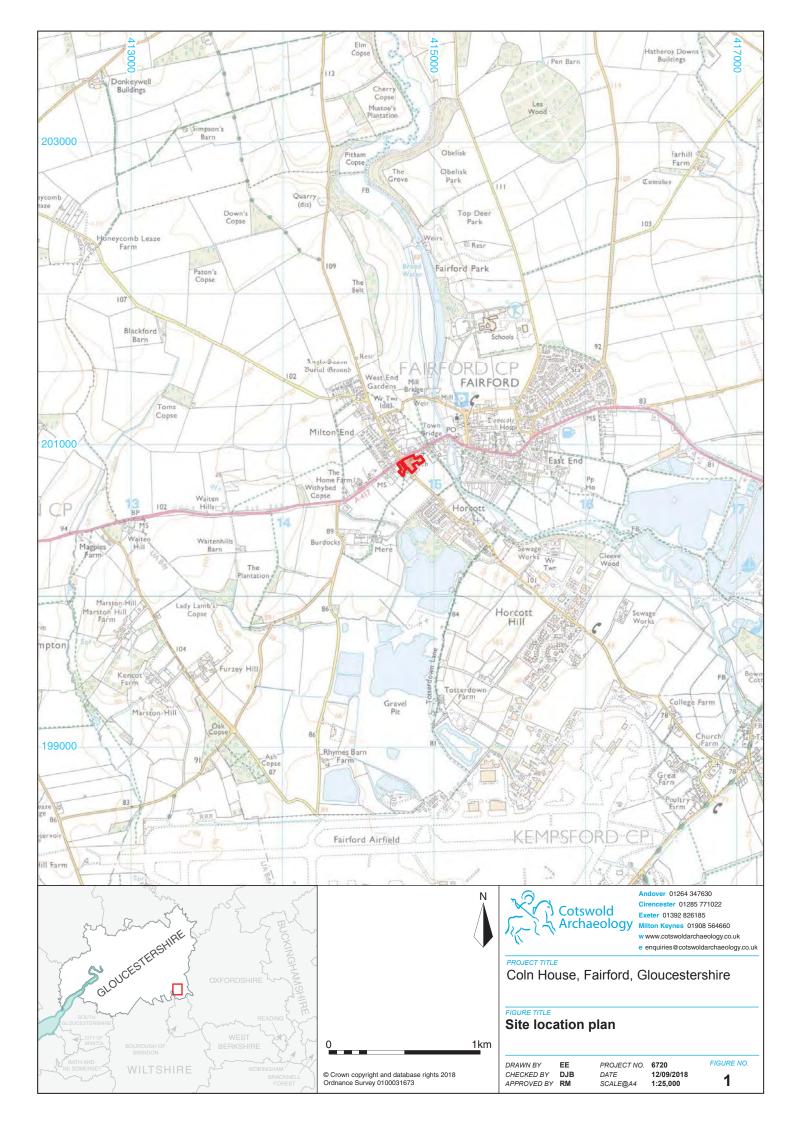
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1. INTRODUCTION

1.1. In July 2018, Cotswold Archaeology was commissioned by Gloucestershire County Council to prepare a Heritage Statement to inform proposals for the redevelopment of Coln House School in Fairford (hereafter referred to as 'the Site'; centred SP 1486 0087 – see Fig. 1). The Site is occupied by the Grade II Listed Building of Coln House and several other non-Listed historic and modern buildings; and lies within Fairford Conservation Area.

Consultation

1.2. Pre-application advice was received from Cotswold District Council on 16th January 2018 (see Appendix 1). This highlighted the sensitivity of the historic buildings to redevelopment; and concluded that there was no objection in principle and the proposed development was a considered to represent a sustainable use of previously developed land. It was noted that 'Any works to the Listed Building, curtilage structures or within its historic curtilage should be informed by a robust and impartial statement of significance that assesses the architectural evolution and significance of the site' and 'Any external alterations [to the non-Listed buildings on the west side of Horcott Road] should be based upon an appropriate assessment of their significance'.

Objectives

- 1.3. This report focuses on establishing the built heritage constraints and opportunities of redevelopment. Specific objectives are to understand the significance of the historic buildings within the Site (principally: Coln House and Applestone Court), to establish the contribution of the Site (if any) to the character and appearance of Fairford Conservation Area, and to ascertain whether the Site is an element of the setting of any designated heritage asset that contributes to its significance; and thence, to comment upon the current design proposals and, where appropriate, to recommend measures to avoid and/or to mitigate harm to built heritage.
- 1.4. The intended scope of this Heritage Statement was submitted to and approved by Adrian Walker, Senior Case Officer at Cotswold District Council, on 3rd September 2018, prior to its commencement.

Statute, policy and guidance context

1.5. This assessment has been undertaken within the key statute, policy and guidance context presented in Table 1.1. The applicable provisions contained within these

statute, policy and guidance documents are referred to, and discussed, as relevant, throughout the text. Greater detail is provided in Appendix 2.

Statute	Description
Planning (Listed Buildings and Conservation Areas) Act (1990)	Act of Parliament placing a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.
National Heritage Act 1983 (amended 2002)	One of four Acts of Parliament providing for the protection and management of the historic environment, including the establishment of the Historic Monuments & Buildings Commission, now Historic England.
Conservation Principles (English Heritage 2008)	Guidance for assessing heritage significance, with reference to contributing heritage values, in particular: evidential (archaeological), historical (illustrative and associative), aesthetic, and communal.
National Planning Policy Framework (2019)	Provides the English government's national planning policies and describes how these are expected to be applied within the planning system. Heritage is subject of Chapter 16.
Good Practice Advice in Planning: Note 2 (GPA2): Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)	Provides useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.
Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets – Second Edition (Historic England 2017)	Provides guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.
Cotswold District Local Plan 2011–2031	Comprises the local development plan (local plan), as required to be compiled, published and maintained by the local authority, consistent with the requirements of the NPPF (2018). Intended to be the primary planning policy document against which planning proposals within that local authority jurisdiction are assessed. Where the development plan is found to be inadequate, primacy reverts to the NPPF.

 Table 1.1
 Key statute, policy and guidance

2. METHODOLOGY

Assessment of heritage significance

2.1. The significance of designated heritage assets that may be affected by the proposed development has been assessed and described, in accordance with paragraph 189 of the NPPF (2019), the guidance issued by the ClfA (2014), and 'Historic Environment Good Practice Advice in Planning Note 2' (Historic England 2015). Determination of significance has been undertaken according to the industry-standard guidance on assessing heritage value provided within 'Conservation Principles' (English Heritage 2008). This approach considers heritage significance to derive from a combination of one or more of the following discrete heritage values: i) evidential (archaeological), ii) historic (illustrative and associative), iii) aesthetic, and iv) communal, amongst others. Further explanation of this approach (including the definition of those aforementioned values), as set out and advocated by Historic England, is provided in Appendix 2 of this report.

Assessment of potential development effects (benefit and harm)

- 2.2. This report sets out, in detail, the ways in which identified susceptible heritage assets might be affected by the proposals, as well as the anticipated extent of any such effects. Both physical effects, i.e. resulting from changes to the fabric of heritage assets, and non-physical effects, i.e. resulting from changes to the setting of heritage assets, have been assessed (see below).
- 2.3. The assessment of the historic buildings and structures within the Site comprised archival research and recording of each building equivalent to a 'Level 2 / 3' survey as defined in Historic England's guidance 'Understanding Historic Buildings: A Guide to Good Recording Practice' (2016a). The full results of this survey are provided in a technical report (see Appendix 4) but are summarised in Section 4, below. The character appraisal of Fairford Conservation Area was undertaken in accordance with methodologies presented in Historic England's guidance document 'Advice Note 1: Conservation Area Designation, Appraisal and Management' (2016b).
- 2.4. Regarding non-physical effects, or settings assessment, the five-step methodology advocated by Historic England and set out in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' (Historic England 2017) has been adhered to. Step 1 entails identifying which heritage assets and their settings are likely to be affected by the development proposal. Step 2 assesses the

degree to which setting contributes to the significance of the heritage assets, or how it allows their significance to be appreciated. Step 3 then considers how, if at all, and to what extent any anticipated changes to the setting of those assets, as a result of development within the Site, might affect their significance or the ability to appreciate it. Finally, Step 4 considers if/how any identified heritage enhancements might be maximised and if/how any identified harm to heritage significance might be minimised.

2.5. Identified effects upon these designated heritage assets have been defined within broad 'level of effect' categories (see Table 2.2). These are consistent with key national heritage policy and guidance terminology, particularly that of the NPPF (2019). This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. However, these broad determinations of level of effect should be viewed within the context of the qualifying discussions of significance and impact presented in Sections 4 and 5 of this report. It should be noted that the overall effect of development proposals upon the designated heritage asset are judged, bearing in mind both any specific harms or benefits (an approach consistent with the Court of Appeal judgement Palmer v. Herefordshire Council & ANR Neutral Citation Number [2016] EWCA Civ 1061).

LEVEL OF EFFECT	DESCRIPTION	APPLICABLE STATUTE & POLICY
Heritage benefit	The proposals would better enhance or reveal the heritage significance of the designated heritage asset.	Enhancing or better revealing the significance of a designated heritage asset is a desirable development outcome in respect of heritage. It is consistent with key policy and guidance, including paragraphs 185 and 200 of the NPPF (2018).
		Preserving a Listed Building and its setting is consistent with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Preserving or enhancing the
No harm	The proposals would preserve the significance of the designated heritage asset.	character or appearance of a Conservation Area is consistent with Section 72 of the Act.
		Sustaining the significance of a designated heritage asset is consistent with paragraph 185 of the NPPF (2018), and should be at the core of any material local planning policies in respect of heritage.

LEVEL OF EFFECT	DESCRIPTION	APPLICABLE STATUTE & POLICY
Less than substantial harm (lower end)	The proposals would be anticipated to result in a restricted level of harm to the significance of the designated heritage asset, such that the asset's contributing heritage values would be largely, though not entirely, preserved.	In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 196 of the NPPF (2018). Proposals involving change to a Listed building or its setting, or any features of special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of Sections 7, 66(1) and 72(2) of the 1990 Act. The provisions of the Act do not apply to the setting of Conservation Areas. Proposals with the potential to physically affect a Scheduled Monument (including the ground beneath that monument) will be subject to the provisions of the Ancient Monuments and Archaeological Areas Act (1979). The provisions of the Act do not apply to proposals involving changes to the setting of Scheduled Monuments.
Less than substantial harm (upper end)	The proposals would lead to a notable level of harm to the significance of the designated heritage asset. A reduced, but appreciable, degree of its heritage significance would remain.	
Substantial harm	The proposals would very much reduce the designated heritage asset's significance or vitiate that significance altogether.	Paragraphs 193–195 of the NPPF (2019) would apply. Sections 7, 66(1) and 72(2) of the Planning Act (1990), and the Ancient Monuments and Archaeological Areas Act (1979), may also apply.

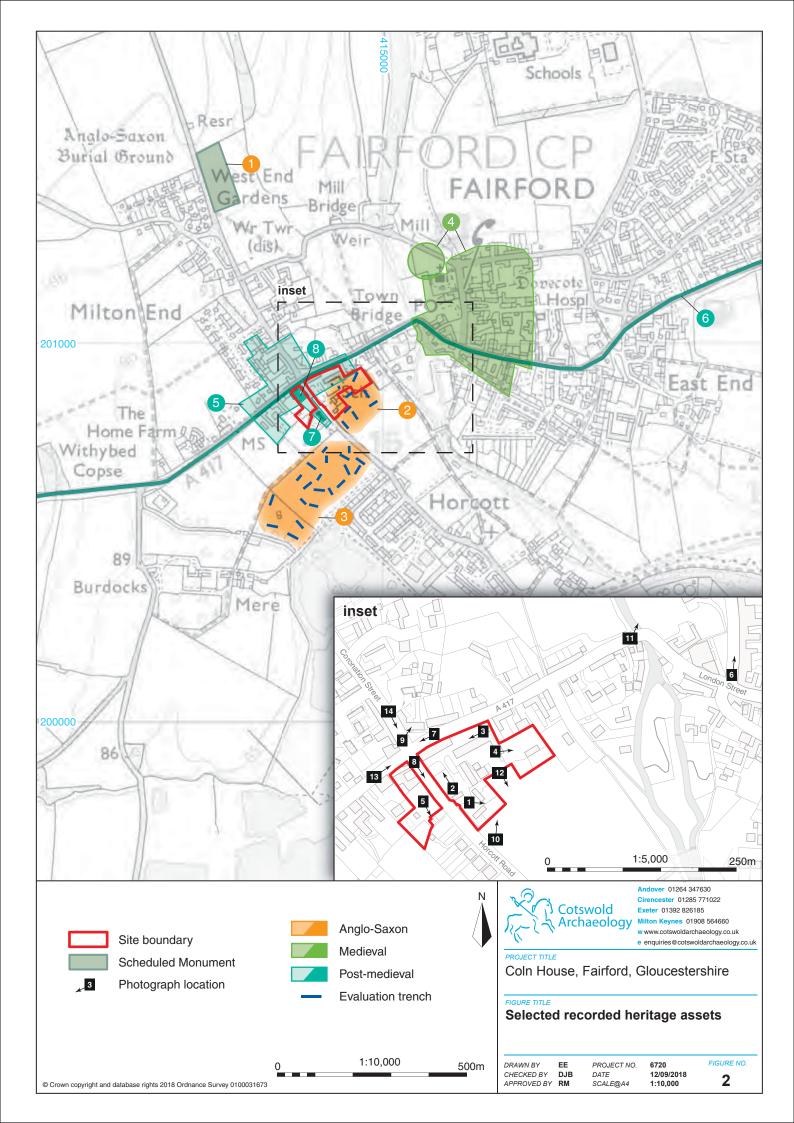
Table 2.2 Summary of level of effect categories (benefit and harm) referred to in this report in relation to designated heritage assets, and the applicable statute and policy

2.6. A recent judgement by Justice Lindblom in (The Queen) v. Sevenoaks DC [2014] EWHC 1895 (Admin) states that 'preserving', in terms of character, appearance and setting of Listed Buildings and Conservation Areas, means doing 'no harm'. Thus, 'preserving' does not necessarily mean 'no change'; it specifically means 'no harm'.

Data collection and limitations

2.7. The assessments presented below have been informed by a review of Gloucestershire Historic Environment Record data sourced for a 500m radius of the Site and subsequently processed and analysed (see Appendix 3); historic maps and other relevant documentary sources viewed online and consulted in person at the Gloucestershire Archives and Fairford Library (see Section 8); and observations made during the site visits and historic building recording survey undertaken on 22nd August and 11th September 2018 respectively.

- 2.8. The assumption is made that the information derived from the various primary and secondary sources is reasonably accurate. The records held by the Gloucestershire HER are not a record of all surviving heritage assets, but rather, a record of the discovery of a wide range of archaeological and historical components of the historic environment. Thus, the information held is not complete and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown.
- 2.9. For both visits, weather conditions were sunny with sufficient access and visibility to inspect the buildings within the Site, to undertake a character analysis of Fairford Conservation Area, and to conduct settings assessments for selected Listed Buildings. Many photographs were taken during the visits and a selection is included in this report.



3. HISTORICAL DEVELOPMENT OF THE SITE

Brief archaeological and historical background

- 3.1. Fairford is known to have early medieval origins. An Anglo-Saxon cemetery was revealed during quarrying at what is now the north-western outskirts of the town in 1844–45 (Fig. 2, 1). An archaeological excavation conducted in the playing fields adjacent to the school (with a small amount of evaluation occurring on the school site) in 1999 (Fig. 2, 2), revealed numerous ditches, post-holes and pits symptomatic of occupation between the 5th and 9th centuries AD (Nicholls 1999), largely located in the playing fields section of the excavation. Archaeological excavations conducted in 2013, 2015 and 2016 to the south of the Site on the west side of Horcott Road (Fig. 2, 3) identified more than 20 probable sunken featured buildings, including a possible hall, dating from the 5th to 8th centuries AD (Bashford 2013; Bennett 2015; Bradley and Wilkins 2016).
- 3.2. By the medieval period, the primary core of settlement surrounded St Mary's Church (Fig. 2, **P** and **4**) and a subsidiary core of settlement known as Milton End was focussed around the crossroads of what are today Cirencester Road, Milton Street, Coronation Street, and Horcott Road (Fig. 2, **5**). The 1999 excavation within the eastern part of the Site (Fig. 2, **2**) uncovered a wall dating to between the 12th and 15th centuries AD, indicating a medieval building (Nicholls 1999). Given the presence of the crossroads, with extant early-17th to 18th century buildings on the north side (Fig. 2, **D–L**) and along the west side of Horcott Lane (Fig. 2, **7**), it is probable that buildings also occupied the Milton Street and Horcott Road frontages of the Site during the post-medieval period, prior to the construction of 'The Retreat' (Fig. 2, **B** and **8**; see below).

Historic map regression

3.3. The earliest map showing the Site that was consulted for this assessment was the 1816 Ordnance Survey surveyor's drawing (not illustrated), which appears to show buildings along both frontages of the upper section of Horcott Lane just south of the junction with Milton Street. However, unfortunately, it is not possible to discern the buildings' footprints or function. In 1823, Alexander Iles was granted a license 'to keep a Mad House... to keep for one year next ensuing at the house in which he now lives in Fairford aforesaid, any number of lunatics not exceeding ten'. The asylum was known as The Retreat and occupied the Site. In 1828 he applied to renew his license to accommodate up to 24 patients; the accompanying plan (see Fig. 3) shows the original, small, footprint of Coln House, which is labelled 'The

Dwelling House' (red); and two walled gardens, one for women (green) and the other for men (yellow), to the south and east of the house (with the wall of the latter noted to be 12ft high); a kitchen garden to the east of the men's garden (blue); and 'a ground of 3 acres' in the southern part of the Site, which is later referred to as an exercise field (see Section 3.6)

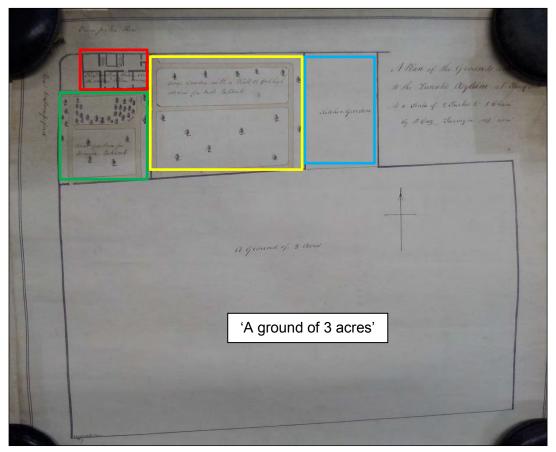


Fig. 3 Extract of 1828 Plan of The Retreat – east side of Horcott Road

(Image courtesy of Gloucestershire Archives)

In 1829, lles applied for 'premises additionally fitted up for the reception of female lunatics. The situation is close to the house I now occupy'; these premises were located on the west side of Horcott Road, whilst lles presumably resided in part of Coln House on the east side of Horcott Road. The accompanying plan and elevation drawings (see Fig. 4) show a terrace of three two-storey cottages, the appearance and layout of which suggests that lles was proposing the conversion of existing cottages rather than the construction of a new building; the small rooms are labelled with intended uses such as 'Patients not requiring restraint' and 'Patients that may be considered convalescent'. Also shown is a 'yard for second class patients' on its north side, extending up to the Cirencester Road frontage, and a

large 'ground for first class' on its south side; both areas are dotted with trees and a summer house is shown in the south-western corner of the first class grounds.

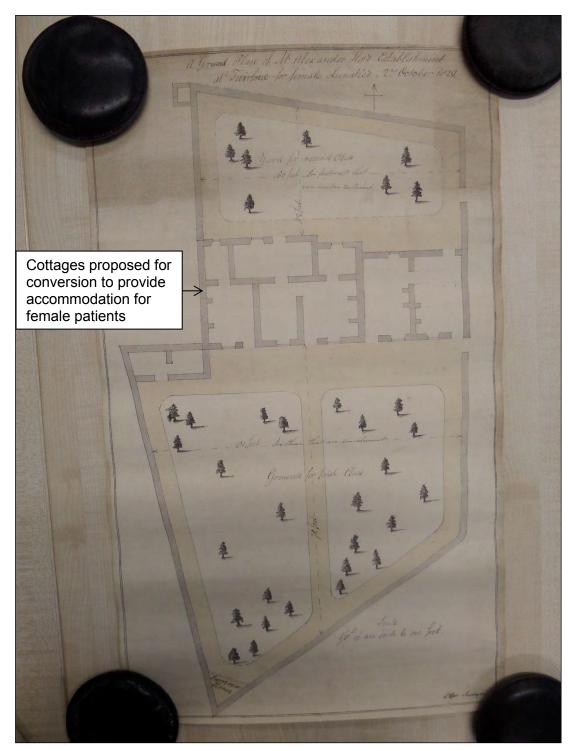


Fig. 4 Extract of 1829 Plan of The Retreat – west side of Horcott Road (Image courtesy of Gloucestershire Archives)

3.5. A plan of 1834 (see Fig. 5) does not show the cottages (it is not clear whether they were simply not illustrated or had been demolished by this time; see below), but two new building ranges are shown in the north-eastern corner of the plot, separated by a 'Large Covered Shed for Patients to Exercise In' and with a larger 'Yard for Exercise' to the west. By 1837, The Retreat housed 140 individuals, now admitting paupers as well as private patients (Lewis-Jones 2007, 73). At around this time, a new three-storey building, today known as Applestone Court, was built on approximately the same footprint as the former cottages (Photo 1).

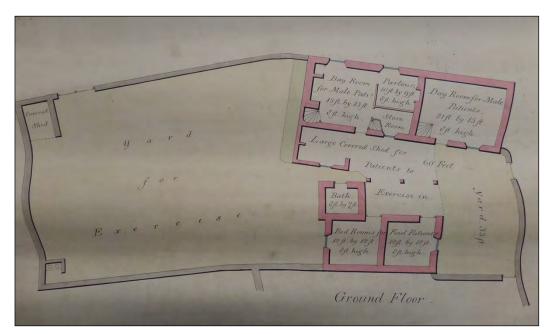


Fig. 5 Extract of 1834 Plan of The Retreat (Image courtesy of Gloucestershire Archives)



Photo 1 1838 datestone on chimneystack of eastern elevation of Applestone Court

3.6. The Fairford Tithe Map dated 1840 shows the original and new buildings on the west side of Horcott Road (see Fig. 6). Coln House is shown as a fairly diminutive two-wing building that has not yet been extended to front the corner of Milton Street and Horcott Road. The Tithe Apportionment identifies the plots to the side and rear of Coln House as gardens (as per the 1828 plan; see Fig. 3) and the ground to the south as 'Field for exercising lunatics'. In the north-western corner of the exercise field, fronting Horcott Road, is shown an L-shaped building of unspecified function (see Fig. 6, circled). Curiously, this building is not depicted on any earlier or later maps. The Tithe Apportionment confirms the extent of Alexander Iles' landholdings at this time (see Fig. 6, shaded green) and reveals that he also leased two other nearby pasture fields and a garden (see Fig. 6, shaded purple).

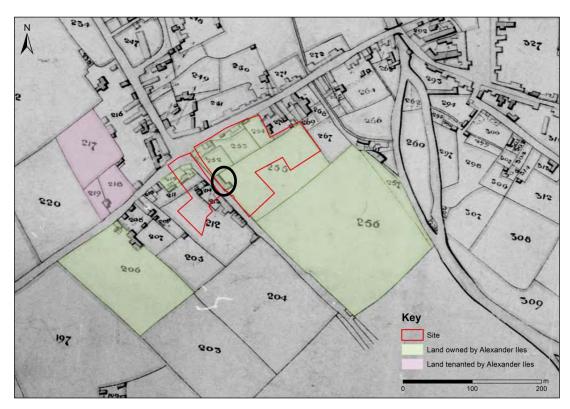


Fig. 6 Extract of 1840 Tithe Map for Fairford (Image courtesy of The Genealogist)

3.7. Documentary records state that patients at The Retreat were engaged as agricultural labourers on lles' farm and in neighbouring gardens (Lewis-Jones 1982, 13). Physical work and exercise was seen as important in the treatment of mental illness in the 19th century (Rutherford 2006, 78–80; see Section 5). Whilst the extent of Alexander lles' landholdings in 1840 has been presented above, it would appear that sometime in the following decades the family acquired the freehold or tenancy of Park Farm (Fig. 2, 9), which at the time of the Tithe Survey was owned by John Raymond Barker), since an Alexander lles is recorded as occupant here in

Kelly's Directory of 1889 (census records reveal that he was a younger relative of his namesake who founded The Retreat). It seems reasonable to assume that the pauper patients worked both in the grounds of The Retreat (see Section 3.8) and on other land owned by the extended lles family in and around Fairford.

- 3.8. The 1845 Lunatic Asylums Act obliged counties to make provision for the insane poor and resulted in considerable growth of asylum numbers (Rutherford 2006, 97). A plan of The Retreat dated 1849 (not reproduced) shows a sizeable complex. On the east side of Horcott Road, Coln House had been extended by the addition of wings to the west and to the east - creating the continuous built frontage to Milton Street that survives today. In the men's airing ground to the east of Coln House (see Fig. 3) is a small structure divided into three 'sleeping rooms' with 'a continued seat with sun shade' about its exterior; and two privies are marked in its southwestern corner. What was formerly the 'Wall Garden for Female Patients' to the south of Coln House (see Fig. 3) has been extended south into the exercise ground and become an 'Ornamental Airing Ground for Male Private Patients'; two 'sun shades' are marked in its south-western corner. The outlying exercise ground is now a 'Field for the employment of patients'. On the west side of Horcott Road is Applestone Court and the other buildings and yards to its north, as well as two other buildings to their west (outlying the Site boundary – these were rebuilt in 1886). The land to the south of Applestone Court is subdivided into four 'Airing Grounds' and an 'Orchard and Drying Ground'; and a building labelled 'Detached Cottage used in cases of Sickness' is shown fronting Horcott Road.
- 3.9. By 1851 patient numbers had risen to 157 but by the end of the decade had fallen significantly after more than 120 individuals were transferred to other local institutions (Lewis-Jones 1982, 13; Millward 2016, 8). The next available map is the First Edition Ordnance Survey, of 1877 (see Fig. 7). In the eastern part of the Site is shown the extended building of Coln House (outlined in yellow), with the formal airing grounds and fields to the rear. What in 1849 was the 'Ornamental Airing Ground for Male Private Patients' has subsequently been extended southwards into the exercise field/employment field (outlined in pink). There seems to be a slope along the southern edge of this airing ground, perhaps to discourage patients fleeing the complex. In the western part of the Site is the cluster of buildings and yards at the Cirencester Road frontage (outlined in green) and the large building of Applestone Court (outlined in blue), with gardens and an orchard to their rear.

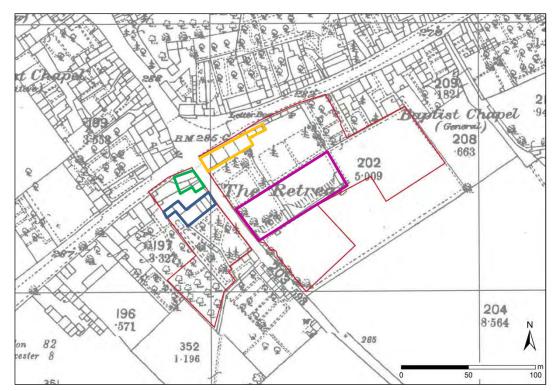


Fig. 7 Extract of the 1887–92 Ordnance Survey Map (Image courtesy of Promap)

- 3.10. Census records and trade directories dating from 1881, 1889 and 1891 reveal that the Iles family owned and occupied numerous properties in Fairford including The Retreat, Park Farm, and Croft House. The latter is referred to as another asylum run by the Iles family, and seems to have been established in the 1860s according to plans held by Gloucestershire Archives; but at or after the turn of the 20th century it had become Fairford's cottage hospital (Lewis-Jones 1982, 13).
- 3.11. According to an oral history testimony reported in an article in the Wiltshire and Gloucestershire Standard in 2000 (see Section 8), The Retreat was taken over by a Dr King-Turner following the accidental death of the previous proprietor Daniel Iles, which according to death records, occurred in 1900. Indeed, the 1911 census states the King-Turner family as owner-occupiers of The Retreat; interestingly, the names or initials of the patients and their nurses and attendants are also recorded. The 1902 Ordnance Survey shows little change to the Site from the earlier editions (not illustrated). By 1921, although the aforementioned slope is marked, the formal ornamental layout of the 'airing grounds', i.e. crossed by paths with tree planting, is not illustrated (see Fig. 8). This does not mean that such features were not present, rather, it seems that such details were not recorded by the cartographer.

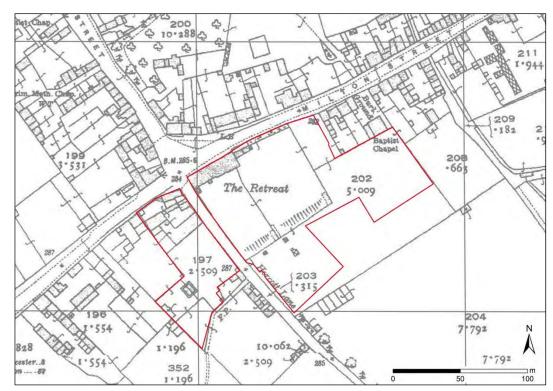


Fig. 8 Extract of the 1921–23 Ordnance Survey Map (Image courtesy of Promap)

- 3.12. However, another oral history testimony cited in the same aforementioned article in the Wiltshire and Gloucestershire Standard states that certainly in the late-1920s or 1930s, there were (still) gardens to the south of the 'accommodation block' on the west side of Horcott Lane (i.e. Applestone Court). An undated historical photograph published by Lewis-Jones (which by the fashions would appear to date from the early-20th century) depicts a group of nurses 'enjoying a break in the summer house at the back of The Retreat' (2007, 74); this building survives in the lawned area to the rear of Applestone Court, in the south-western part of the Site. The 1921 Ordnance Survey marks several small structures in the outlying exercise ground / employment field, which may be shelters or stores.
- 3.13. The Retreat remained in use as an asylum until 1944 or 1945, after which it was apparently occupied by the Wings Riding School before becoming a school. Gloucestershire Archives hold plans showing the alterations and a new classroom block needed to convert the former asylum (dated 1948) as well as drawings of further teaching blocks (dated 1956) and to provide accommodation for staff (dated 1960); these sources were consulted as part of this assessment and are cited in greater detail in Section 4, below. The teaching blocks are depicted on the 1960 Ordnance Survey Plan (not illustrated); the staff houses are depicted on the 1977 Ordnance Survey Plan (see Fig. 9).

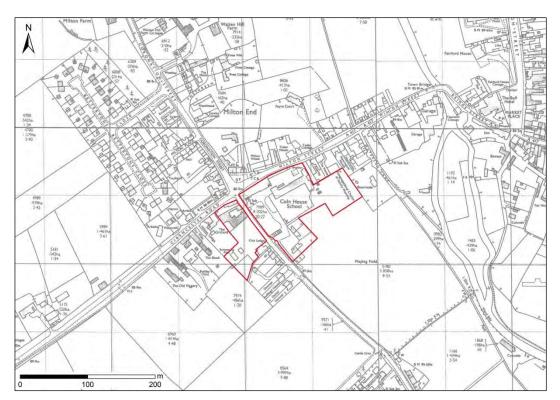


Fig. 9 Extract of the 1977 Ordnance Survey Map (Image courtesy of Promap)

3.14. The school formally closed in 2017. Within the eastern part of the Site (on the east side of Horcott Road) is Coln House, the modern teaching blocks and staff houses, hardstanding for playgrounds and car parking, and a large overgrown garden (Photos 2–5). The playing fields to the south are excluded from the Site boundary. Within the western part of the Site (on the west side of Horcott Road) is Applestone Court, the more diminutive buildings to its rear (north side), and a lawn garden (south side) (Photos 6 and 7). The Horcott Road frontages of both parts of the Site are defined by stone walls (Photo 10). The significance of the historic buildings and the boundary walling is discussed in the following section.



Photo 2 Staff houses in the southern part of the Site



Photo 3 Small garden to the rear of Coln House



Photo 4 Modern teaching blocks and playground in the eastern part of the Site



Photo 5 Overgrown garden in the north-eastern part of the Site



Photo 6 Buildings and yard on the north side (rear) of Applestone Court



Photo 7 Garden on the south side (front) of Applestone Court

4. STATEMENT OF SIGNIFICANCE

- 4.1. As stated in Section 2, the historic buildings within the Site (namely Coln House, Applestone Court, the outbuildings framing the yard to the north of Applestone Court and the summer house in the garden to the rear of Applestone Court have been subject to 'Level 2 / 3' recording survey in order to determine their significance and their capacity for change. The results of these surveys are provided in a technical report (see Appendix 4); what follows is a summary of the significance of these buildings.
- 4.2. As a group, Coln House and Applestone Court are of high evidential and illustrative significance for the history of care for the mentally ill, from the traditional restraint and seclusion of the 18th century to the more therapeutic approach that developed from the mid-19th century, and from private to public provision.
- 4.3. Although the buildings have undergone much change, they still retain a high degree of legibility of the functions and layout of the mid 19th-century asylum and its antecedents. They also illustrate the growth in provision and the change in its character, partly, it is presumed, as a result of the first Lunatic Acts in 1845. Combined with the early surveys this allows a detailed reconstruction of the way the 1820s to 1850s asylum operated.
- 4.4. Architecturally, Coln House, as a Grade II Listed Building, is of high heritage significance. The listing is based on the external appearance of the street fronts, which forms a very attractive composition of Georgian/early Victorian style. The same is true of the southern elevation, although this has been rather spoiled by the fire escape and the alteration to the fenestration of Building 2A. The interior features, historical and architectural, unseen by the English Heritage Investigator, only add to the significances.
- 4.5. Internally, the most important features are staircase ST1 and its hallway, the remains of the winder stair ST2 and the grand stair ST4 in Building 4. Fireplaces where they survive are also of importance to the character of the building, being of high to moderate aesthetic significance and moderate evidential significance. The elliptical arches over the openings at the foot of ST3 and on the first floor are of moderate architectural interest but of high evidential significance for the character of the changes when Building 2B was added.

- 4.6. Apart from window and door woodwork, little else of specific architectural interest remains in the interior, although the plaster frieze in B1/G2 is of interest. It is typical rather than outstanding, but does attest to the status of this room. The same can be said about the window and door joinery.
- 4.7. The spine beams in B2A might be of evidential significance. They are boxed-in except for one end on the first floor, which is damaged. Revealed, they might have datable features.
- 4.8. Applestone Court is unlisted, and this is probably more to do with its secluded position and because the elevations visible from the street are rather workaday. On its external architectural merits the building is probably not listable, nonetheless. It is a late and not particularly memorable example of Regency/Early Victorian institutional design, basically a row of plain terraced houses with vernacular features that were becoming fashionable in this period.
- 4.9. The building is nonetheless of interest. It is in broadly original condition, with staircase ST2 and the front ground-floor rooms of most interest as interiors of 1838. They are of moderate significance and are relatively plain, but still retain attractive chimneypieces and window and door joinery of the period. Room G9 has been much altered by the addition of the bay window, removal of the fireplace and the addition of the plaster decorative detail on the ceiling. This is of low to moderate significance, but is good of its kind.
- 4.10. The main first floor rooms are also basically in original condition but with 1.6/1.7 still divided by modern partitions. By 1948 they were all interconnected, but this was probably not the case as built. The rear range seems to have played a communication role with a corridor running along the south side linking the rooms and stair ST2. Nevertheless, the rooms are of moderate architectural significance and of moderate to high evidential significance, as no plans survive of the upper floor before 1948.
- 4.11. The rear range retains little detail of its original form although the window joinery in 1.14 and ST 1 is original as is the rear door to G8. The main significance lies in the evidential and illustrative qualities of the fabric, which must be moderate.
- 4.12. The room and stair layout on both floors strongly suggests that the east end of the range was intended to be self-contained and this is of moderate to high evidential significance for the history of the running of the asylum.

- 4.13. The Street Range is much modified from its earlier forms and little remains of its 1849 arrangements or fabric. It has considerable potential for evidential value to see how much of its pre-asylum and early asylum form remains or can be inferred if modern finishes and blockings are stripped out. Its cellar, perhaps filled in or merely sealed off, will be of interest.
- 4.14. The boundary walls of both sites are of moderate illustrative significance being the walls of the properties from before 1828 at least, although the wall around the lawn at Applestone Court must have been rebuilt after 1829 as the grounds were extended south after that time, presumably in 1838. They are also an important part of the character of the conservation area. The other walls around part of the garden are thought to be 20th century; they do not seem to appear on the 1877 OS.
- 4.15. The modern school buildings are of two main phases. The main classroom block was built in 1948 and the side ranges were added in 1956. Detailed architect's plans are extant for both so that the evidential value of the structures is low, except in so far as they illustrate the drawings and any changes made since.
- 4.16. The designs are of moderate heritage significance from an architectural point of view, the 1948 block, in particular, illustrating the use of pre-war architectural theory by the Ministry of Education and local education boards in the immediate post-war years to meet the requirements of the 1944 Education Act.

5. CONSERVATION AREA CHARACTER ANALYSIS

5.1. Fairford Conservation Area was designated in 1970, with an unspecified revision to its boundary in 1990; approximately half of the Site lies within the Conservation Area (Fig. 2, **A** and Fig. 10). There appears to be no existing Conservation Area Appraisal prepared by or for Cotswold District Council; thus, a character analysis has been undertaken as part of this Heritage Statement and is presented in this section. It has been informed by the findings of desk-based research (see Section 3) and observations made during a walkover survey and it follows the principles presented in the 'Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management' (2016b).

Spatial layout

- 5.2. The Conservation Area comprises the 'spine' of the A417 (which, through Fairford, is known variously as Cirencester Road, Milton Street, Bridge Street, London Street, and London Road) with the primary settlement core focussed within the 'grid' of London Street, High Street, Park Street (formerly known as Calcot Street), and Lower Croft (Photo 8); and the subsidiary settlement core focussed around the crossroads of Cirencester Road, Milton Street, Coronation Street, and Horcott Road (Photo 9). Modern development has principally occurred as a north-eastern expansion of the town and is excluded from the Conservation Area.
- 5.3. The two historic settlement cores are separated by the River Coln, which is crossed by a bridge at the sharp corner of Milton Street and Bridge Street; the mid- and eastern sections of Milton Street have a continuous building line on both frontages, with open meadows to the rear of the properties on the north side of the road. A number of back lanes and footpaths branch off from both sides of the 'spine'. Some, such as Waterloo Lane and Back Lane, host terraced cottages; others serve as cutthroughs to other streets (for instance, between London Street and The Croft) or extend out of the town into the outlying fields.
- 5.4. There is a strong sense of built enclosure along the sections of Bridge Street and London Street either side of the junction with High Street and a 'softer' sense of enclosure along The Croft and Park Street. Contrasting with this is the openness of the hard-landscaped historic market place at High Street and the undeveloped green spaces of the meadows between Bridge Street and Mill Lane; the parkland to the north of Park Street between the River Coln and Leafield Road; the playing fields between The Croft and Park Street; and land to the east of Morgan Hall.

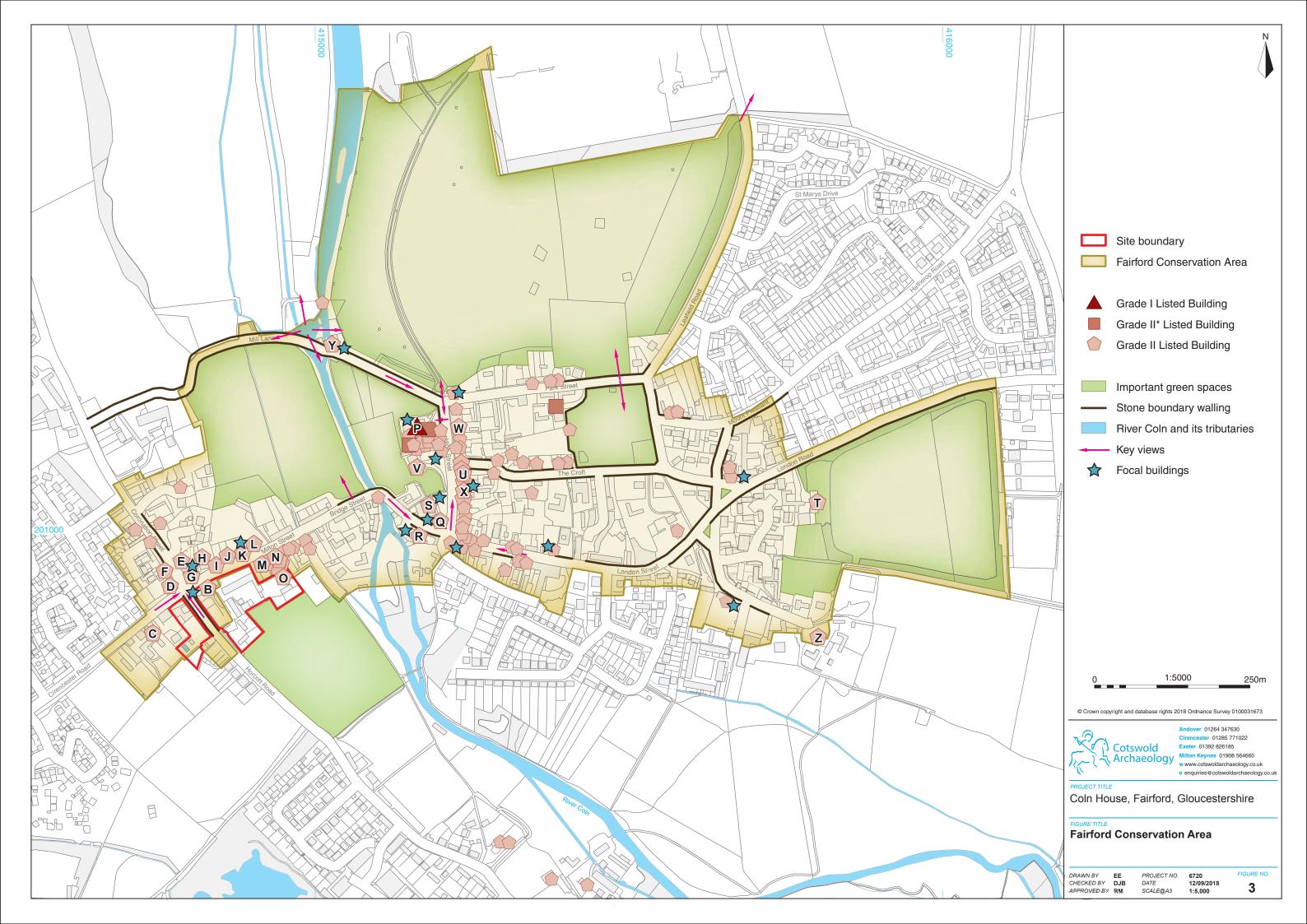




Photo 8 Town core, looking north up High Street from London Street



Photo 9 Milton End crossroads, looking west along Milton Street

Built form (style and materials)

- 5.5. There are a total of 110 Listed Buildings within the Conservation Area, which are concentrated along Milton Street and High Street (see Fig. 2). Almost all are Listed at Grade II; the exceptions are the Grade I Listed St Mary's Church (Fig. 2, **P**), three Grade II* Listed monuments within its churchyard, and a Grade II* Listed dovecote in the former farmyard of Park Farm. There are numerous other non-Listed historic buildings within the Conservation Area, including Applestone Court in the western part of the Site (Fig. 2, **8**), the terraced cottages on the west side of Horcott Road immediately to the south (Fig. 2, **7**), and the terraced cottages on the north side of Milton Street to the west of the river bridge.
- 5.6. Some of the oldest buildings within the Conservation Area are St Mary's Church (Fig. 2, **P**), which retains its 15th century tower; The Chanting House (Fig. 2, **Q**), which has a late-15th to early-16th century south end range; The White Hart (Fig. 2, **R**), which is reputed to date from 1475, though its surviving fabric is of 17th century date; The Bull Hotel (Fig. 2, **S**), which has a late-16th century core; Tudor House (Fig. 2, **K**) and Morgan Hall (Fig. 2, **T**), which are both of late-16th century origin; and The Old Tracey (Fig. 2, **C**), which has a date-stone of 1607. Several of these buildings can be considered 'focal buildings' within the Conservation Area (also see Section 5.8).
- 5.7. The majority of historic buildings in Fairford, however, date from the late-17th, 18th and 19th centuries; and include cottages (such as those on Coronation Street (Fig. 2, E and F) and on Park Street), grander houses (such as Manchester House on High Street (Fig. 2, U) and Ivy Villa on Cirencester Road (Fig. 2, C)), and religious, civic and commercial buildings (such as the Baptist Chapel on Milton Street (Fig. 2, O) and the former Police Station (Fig. 2, V) and Lloyds Bank (Fig. 2, W) on High Street). The Victorian school building does not survive; Coln House (Fig. 2, B) and Applestone Court (Fig. 3, 8) represent a former asylum that became a school. There are outbuildings in the rear yard of The Bull Hotel, visible from Bridge Street; and agricultural buildings of Mill House (Fig. 2, X) and Moor Farmhouse (Fig. 2, Y) at the periphery of the Conservation Area. The mix of building ages and uses exemplifies the historic development of the town.
- 5.8. The historic buildings within the two settlement cores are predominantly of two or three storeys (cottages often having dormers), are terraced, and directly front the pavement; traditional building materials comprise a light, white or cream-coloured limestone (brick typically found only for chimneystacks or infill) with stone or slate

roof tiles and wooden casement and sash windows. This uniformity of building position and form creates cohesion to the Conservation Area. The Chanting House (Fig. 2, **Q**) and The White Hart (Fig. 2, **R**) are unusual for the exposed timber-framing on their Bridge Street elevations; Tudor House (Fig. 2, **K**) is distinctive for its stone mullion windows and Lloyds Bank (Fig. 2, **W**) for its strong neo-Gothic façade; and Coln House dominates the Milton End crossroads on account of its vertical scale and horizontal massing (see Section 5.18 and Section 6). These buildings can be considered 'focal buildings' within the Conservation Area.

5.9. As mentioned, buildings often directly front the pavement; but where they do not, limestone walling is often present, for instance: along both sides of the northern section of Horcott Road (i.e. the eastern boundary of the western part of the Site and the western boundary of the eastern part of the Site, Photo 10), approaching and across the town bridge, at the frontage of the rear access to The Bull Hotel from Bridge Street, and along The Croft and Park Street (including long sections demarcating the playing fields and the outlying parkland) and Mill Lane. Boundary treatments are a notable feature of the Conservation Area, creating a 'hard edge' and a strong sense of enclosure to many streets (see Section 5.4).



Photo 10 Continuous built frontages of the northern section of Horcott Road

Trees and green space

- 5.10. There is an overall sense of leafiness within all parts of the Conservation Area except along the eastern section of Bridge Street where it approaches the junction with High Street and along its continuation as the narrow and very enclosed London Street. Even in the historic market place, the hardstanding used as car parking is visually softened by the woodland in the adjacent grounds of Fairford House.
- 5.11. Verges and hedges are found along the western section of Park Street and along Lower Croft; and there is a small enclosed allotment garden at the junction of London Road with Lower Croft and a small green at the Milton End crossroads (Photo 11). In addition, mature trees line the eastern section of Park Street and the western section of The Croft; and there is a belt of woodland along the Leasfield Road frontage of Fairford Park (see below).
- 5.12. As already mentioned, there are several key undeveloped green spaces within the Conservation Area. The river meadows between Milton Street/Bridge Street and Mill Lane demarcate the main town core (to the east) from the subsidiary core (to the west. The playing field between The Croft and Park Street provides a buffer between the surrounding streets; and the grounds of Morgan Hall provide a contrast to the block of modern development to the north. The parkland outlying Park Street and Mill Lane alludes to the wider agricultural landscape setting of Fairford.
- 5.13. There are other open spaces within and at the edges of the town that are excluded from the Conservation Area boundary, but which similarly provide a contrast to the density of development within the town. These spaces include: the floodplain and 'island' of the River Coln to the south of the bridge; the gardens between The Orchard, The Croft, Lower Croft and London Road; and the grounds of Coln House and the playing fields to its south (Photo 12).

Wider setting and outward views

5.14. The wider setting of the Conservation Area is rural in character. The landscape to the north is largely unchanged in character from the First Edition Ordnance Survey Map – comprising tree-studded parkland of Fairford Park and farmland punctuated by small copses and dispersed farmsteads. The landscape to the south and southeast, however, has been subject to residential development, quarrying and military activity. The aforementioned green spaces either side of Horcott Road act as a buffer between the town of Fairford and the modern extension to the historic hamlet of Horcott beyond which are several lakes created in former gravel pits, a sewage

works, and RAF Fairford. To the south-east of Fairford is a more extensive area of former quarrying.

- 5.15. Within the Conservation Area, views are mostly directed along and confined to the linear streets due to the typically continuous built frontages; however, the openness at the bridge presents views along the river and across the river meadows (Photo 13). Otherwise, it is only from the western and northern edges of the Conservation Area that the outlying countryside can be discerned. Along Mill Lane there are continuous views across the outlying parkland and countryside (to the north) and across the river meadows and towards the town (to the south). These can be considered 'important' or 'key views', in permitting an appreciation of the historic and current landscape context of the town i.e. focussed on (a crossing point of) the River Coln and surrounded and supported by its agricultural hinterland.
- 5.16. Elsewhere along the boundary of the Conservation Area, however, not least, the south-western corner that extends through the Site, long-ranging views are limited by intervening built form and/or vegetation. From the southern boundary of the Conservation Area within the eastern part of the Site, outward views are blocked by trees. From the southern boundary of the western part of the Site, which lies *c*.50m south of the southern boundary of the Conservation Area, there are views across the playing field but the fields beyond are screened by the belt of trees at its south side (Photo 14).



Photo 11 Small green at the Milton End crossroads (opposite Coln House)

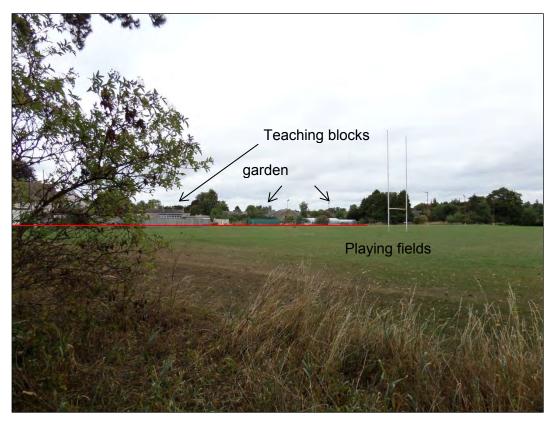


Photo 12 Playing fields on the east side of Horcott Road to the south of Coln House; red line indicates the approximate southern boundary of the western part of the Site



Photo 13 View from Bridge Street across the meadows and towards St Mary's Church



Photo 14 View from the western part of the Site across the playing fields

Contribution of the Site to the character and appearance of the Conservation Area

- 5.17. Only part of the Site namely Coln House and Applestone Court, small areas of surviving and former gardens to their rear, and the boundary walling along both sides of Horcott Road lies within Fairford Conservation Area. The remaining part of the Site comprising the playgrounds and modern teaching blocks and staff houses is excluded from the Conservation Area.
- 5.18. Coln House is a focal point of the Milton End crossroads, appearing dominant and imposing on three approaches. From the east (Milton Street), its height and continuous frontage emphasise its grandeur relative to the neighbouring historic buildings (Photo 9). From the west (Cirencester Road), its scale and massing are emphasised by the stark windowless west elevation that is exposed by the lack of a building on the opposing frontage of Cirencester Road (Photo 15). From the north (Coronation Street), its west wing façade is a focal point, contrasting to the more diminutive terraced cottages and signalling the road junction (Photo 16).
- 5.19. The shared style, height, and two gateways in the boundary walling either side of Horcott Road and along the Cirencester Road frontage surely indicates to the uninformed observer an historical association between the two plots as well as a desire or need for privacy. Only the upper storeys of the rear elevations of Coln House and Applestone Court are visible above the walls (Photo 19), which creates a strong sense of enclosure along the northern section of Horcott Road nearing the crossroads.
- 5.20. The garden to the rear of Applestone Court, lying within the Conservation Area (Photo 7), is entirely screened by the building and boundary walls and in and of itself is considered to make no real contribution to the character and appearance of the Conservation Area. The former gardens to the rear of Coln House were almost wholly removed in the mid-20th century to make way for playgrounds and teaching blocks; the only green space included within the Conservation Area is a very small garden area (Photo 3). The garden and the playing fields lie outside the Conservation Area boundary.
- 5.21. In particular, the playing fields form a part of the setting of the conservation area that contributes to its character and appearance in that they provide an open green space between the town and the hamlet of Horcott to the south, and in this sense provide a demarcation of the two settlements.

5.22. The current contribution of the Site to the experience of the conservation area and its immediate setting (i.e the school areas to the east which lie sandwiched between two parts of the designated area), is neutral to negative in that the now derelict modern school buildings, overgrown playgrounds and boundary vegetation and the general sense of abandonment of the Site and its loss of active use present a negative character which detracts from the character and appearance of the conservation area.



Photo 15 Coln House on the approach from the west via Cirencester Road



Photo 16 Coln House at the terminus of Coronation Street

Impact of the development on the character and appearance of the conservation area

- 5.23. Of course, the general betterment and regeneration of the Coln House section of the Site will directly and quite markedly improve both the appearance of the conservation area and its setting. The refurbishment of Coln House itself will upgrade the appearance of the building on the street frontage, and the soft landscaped parking areas within the rear, combined with the new garden plots to the Coln House dwellings, will ensure that the character of the former openness and garden character of this area is reinstated. Plots 1-4 with their front gardens, merely echo the current school buildings in this location, and actually improve built quality.
- 5.24. The new development proposed over the former modern areas of the school to the east is to be set back from the road, behind the repaired stone walls, and with long front gardens providing a pleasant green frontage that accords with various sections of the street frontages of the conservation area, where some cottages sit behind front gardens. This set back placement also ensures that there is some variety and 'breathing spaces' within the streetscene (where some buildings sit hard to the

roadside) and also allows the listed building to be pre-eminent within the streetscape.

- 5.25. The rhythm and articulation of the terraced dwellings, combined with the colours of their materiality and the forms employed (e.g. gables and dormers) all reference the local vernacular in a pared down and legibly contemporary way, and without an over-densification of the site. The rear parking and gardens combined with the very low density of built form on plots 15-17 to this part of the scheme retain an openness enhanced by green soft landscaping and boundary treatments which allows the new scheme to comfortably transition to the valued green spaces of the playing fields.
- 5.26. In terms of Applestone Court, the removal of the external fire escape, extraneous modern clutter to the street frontage and courtyard areas of the building, and a general upgrade to these areas, combined with the refurbishment of the building, will improve the appearance of this building and the contribution it makes to the conservation area.
- 5.27. Therefore, the proposals will result in an enhancement to the character and appearance of the Fairford Conservation Area, and to its setting, which accords with the provisions of Section 72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act. Positive qualities of the conservation area are retained, whilst the general approach to development of the Site, which includes a retention of green open space and a lack of over-development, will allow this scheme to bring positive placemaking, improving and contributing to the vitality of the town.

6. SETTINGS ASSESSMENTS

6.1. This section considers potential non-physical effects upon the significance of designated heritage assets within the vicinity of the Site. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are discussed in greater detail within the remainder of this section.

Steps 1 and 2: Identification of heritage assets potentially affected and their setting

- 6.2. Step 1 of the Second Edition (2017) of Historic England's 'Good Practice Advice in Planning: Note 3' is to 'identify which heritage assets and their settings are [likely to be] affected' by the proposed development (Historic England 2017, 9). Step 1 entailed undertaking a map-based search of the National Heritage List for England (NHLE) to identify designated heritage assets located within the study area (see Fig. 2), reviewing the Listing descriptions for the identified assets, and consulting historic and current maps and visiting the assets to understand their context.
- 6.3. This exercise concluded that aside from Fairford Conservation Area, as formerly discussed (see Section 5), only the Grade II Listed Building of Coln House and Applestone Court are sensitive to changes to their setting as arising from any new development within the Site. For the numerous other Listed Buildings, including those along Milton Street and Coronation Street (Fig. 2, **C–O**), it was established that despite the geographical proximity, the Site is not an element of their setting that makes a specific or meaningful contribution to their significance; and as such, the proposed development would not alter their setting such that could result in harm to their significance.
- 6.4. To explain further: the significance of these various Listed Buildings is derived almost exclusively from the evidential and aesthetic values of their physical form and fabric as examples of 17th, 18th and 19th century vernacular dwellings at Milton End. Buildings **D**, **E**, and **F** have group value (acknowledged in the Listing description for **F**); as do Buildings **G**, **H**, **I** and **J**, which form part of the same row built from the late-17th to the early-19th century, and Buildings **K** and **L**, which were formerly part of the same dwelling, and Buildings **N** and **O**, in comprising the Baptist Chapel and its Manse. Note that neither **D** and **F**, nor **E** and **G**, despite adjoining one another, are not contemporary with one another.

- 6.5. Coln House and Applestone Court post-date all but Buildings **N** and **O**; and whilst the existence and nature of earlier buildings on their footprint is unknown, certainly no association of shared ownership, occupancy or function has been discerned between the upstanding buildings within the Site and any of these other Listed Buildings from the sources consulted for this assessment. Rather, aside from their aforementioned historical associations with one another, the key elements of the setting of Listed Buildings **C-O** that make some contribution to their significance are their street frontage positioning (with **G** set back behind a small green) and their private grounds (which for the most part comprise rear gardens but for **N** includes its graveyard located between the chapel and the road).
- G is orientated at a diagonal to the crossroads, facing and overlooking Coln House and the boundary walling of the Applestone Court complex (Photo 11). This was not the intended or original outlook of 1 Milton Street, which was built a century before The Retreat was fully established. Rather, there was a much smaller house, which comprises the historic core of Coln House, and possibly other diminutive cottages. However, the present view has existed for almost two centuries since; and, modern road surfacing and signage aside, is representative of the 19th century character of the crossroads of Milton End which is dominated by Coln House, though the entire row of 1, 2 and 3 Milton Street is also a focal point on the approach from both Cirencester Road and Horcott Road. In this way, it is considered that Coln House, and to a lesser degree the Applestone Court complex, make a (limited) contribution to the significance of 1 Milton Street.
- 6.7. Coln House, Applestone Court and the boundary walling to Horcott Road, Milton Street and Cirencester Road will be retained as part of the proposed redevelopment, and as such, their contribution to the character and appearance of the streetscape and thus to the experience of the nearby 18th and 19th century buildings will not be altered.



Steps 2 and 3: Identification of setting and assessment of development effects for Coln House (and associated buildings of The Retreat)

Significance

6.8. The significance of Coln House, Applestone Court, and the various other surviving historic buildings of The Retreat has been appraised and presented in Section 4, above. Thus, the reader is respectfully directed to this Section and its content is not repeated here.

Setting – physical surroundings

- As discussed in Section 3, The Retreat was established as an asylum in 1823 and remained in such use until the end of the Second World War. The design and layout of the complex was intentionally planned to accommodate a growing number of patients who required specialist care. Important principles which were set out in the 1808 Lunatic Asylum Act, scrutinised by a Select Committee questionnaire in 1827, and confirmed again in the 1845 Lunatic Asylum Act would have been the selection of 'an airy and healthy situation', the practical need for confinement and privacy, and the belief in management through segregation (by gender and severity of symptoms) and humane therapy through mental distraction namely recreational activities, exercise, and physical work such as gardening and farming (Rutherford 2003, 66–67, 78–80, 95–99, 111–112; MacKenzie 1986, 38, 126, 214).
- 6.10. This is well-illustrated at The Retreat. Although Alexander Iles seems to have taken an existing property as the basis for his asylum, it was in a suitable situation in being peripheral to the primary town core and with sufficient land that could be turned over to gardens and exercise fields and yards. The plans dated 1828, 1829, 1834 and 1849 show several 'airing grounds' reserved for 'first' and 'second' class men and women; these grounds comprised ornamental gardens crossed by paths and furnished with summer houses, sun shades, and privies. Rutherford notes that summer houses were often for the use of attendants supervising patients, rather than the patients themselves (2006, 112). There was also a kitchen garden and an orchard, and by 1849, the now L-shaped former exercise ground was being used 'for the employment of patients'. The complex appears to have been fully walled.
- 6.11. The 19th century 'designed landscape' of The Retreat was significantly eroded in the mid- to late-20th century when the site was taken over as a school. The 'airing grounds' to the rear of Coln House were probably destroyed in the 1950s and 60s when the teaching blocks, playgrounds, and staff houses were built. The modern teaching blocks and classroom cabins and the tarmacked playgrounds and car park

comprise poor quality built form and surfaces that are uncharacteristic of the historic layout, character and/or appearance of The Retreat. This loss of historic physical setting has harmed and nearly severed the contribution made by setting to significance, by largely removing the former grounds and thus restricting interpretation and appreciation of the place as a former asylum. The playground to the east of Coln House does allude to the historic openness and recreational use of the men's airing ground (see Fig. 3), and the garden in the north-eastern half of the exercise ground / employment field does slightly preserve former historic landscape character (Photo 5). However, these visual links are tenuous and would be largely undiscernible to the public without additional interpretation material.

- 6.12. The lawned garden to the south of Applestone Court, which has escaped development is far more readily and cohesively understood as the historic setting of the building (Photo 7). In fact, it is in the western part of the Site that the former asylum complex is most intelligible (see Section 6.16) and thus contributes most to historic significance.
- 6.13. The perimeter boundary walls survive along the frontages of Cirencester Road, Milton Street and Horcott Road; however, the southern section on the east side of Horcott Road has been lowered, repaired, and altered to create access to the school car park and the eastern section fronting Milton Street has recently been rebuilt (see Section 4). Other walls were observed along the north and east sides of the garden, but it was not clear whether they were built for The Retreat. an internal boundary wall, which seems to correspond to the south-western corner of the former airing ground for male patients, survives between the modern classroom cabins and the modern car park to the south of the staff houses (Photo 17). The lowermost courses of another wall, which may be an internal subdivision of the neighbouring ornamental airing ground for male patients, survives between the rubble-surfaced car park from the tarmacked area to the west of the classroom cabins (see Section 4). In general the survival of walling is a positive contributor to significance, allowing for some interpretation of the former experience of delineation within the 'airing grounds' and general grounds of the asylum.
- 6.14. Despite the changes within the Site, there has been relatively little change in the immediate wider surroundings, this is positive to significance. The former pasture field outlying The Retreat on the east side of Horcott Road (which was owned by Alexander Iles but does not seem to have comprised part of the main complex since it is not included on any of the consulted asylum plans) today comprises playing

fields (Photos 12 and 14). As such, it retains its historically-open character as well as recreational land use that formerly characterised the adjacent 'exercise field' and 'airing grounds' of the asylum to the north. The other buildings in the immediate vicinity of the Site are of 17th–19th century date: comprising the group around the Milton End crossroads and along Milton Street (see Section 5) and the terraced cottages on the west side of Horcott Road (Photo 18).



Photo 17 Remnant walling between the classroom cabins and car park



Photo 18 Terraced cottages on the west side of Horcott Road

Setting - experience

6.15. The status of Coln House as a focal building of the Milton End crossroads has already been discussed (see Section 5); its stark windowless western elevation is imposing when approaching from the west and its height and continuous built frontage to Milton Street renders it a dominant element of the streetscape when approaching from the east or the north (Photos 9, 15 and 16). The boundary walling indicates that there is an historical association between Coln House and Applestone Court; however, the walls block out all but the first and attic storeys, roof and stark eastern elevation of Applestone Court (Photo 19) and the buildings to its rear can only be glimpsed from the entrance to the yard from Cirencester Road. Of course, screening was a key aspect in the design of The Retreat as already discussed.



Photo 19 View of the southern elevation of Applestone Court from Horcott Road

- 6.16. The features of special architectural and historic interest of Coln House can only be distinguished at close range, i.e. from Milton Street, Horcott Road, the playground in front of its southern elevation, and its interior rooms. The scale and massing of the building is best appreciated from Milton Street and from the school car park. From the central part of the Site and from the garden in the north-eastern part of the Site, Coln House is obscured by the intervening modern teaching blocks and the mature copper beech tree. It is considered that the modern school infrastructure has greatly reduced the intelligibility of the former asylum complex; there is no longer a clear physical and visual relationship between Coln House and a 'designed landscape'. This loss of experiential setting results has impacted negatively on the contribution made by setting to historic significance.
- 6.17. The features of special architectural and historic interest of Applestone Court and its outbuildings can similarly only be distinguished at close range, i.e. from its lawn garden, yard and interior rooms. It is best appreciated from its garden, whence the entire façade is visible and its historic 'designed landscape' can be inferred (Photo 7). There has been no modern development in the grounds of Applestone Court aside from the swimming pool and associated structure in the detached plot to the south-west. It is considered that there is greater intelligibility of The Retreat in the

western part of the Site than there is in the eastern part of the Site. From the grounds of each building, there is limited visibility of the other; but the opposing gateways in the boundary walling allude to the association between each part of the complex.

Summary

- 6.18. The key elements of the present setting of Coln House and Applestone Court that contribute to their significance are:
 - Semi-peripheral situation on the western edge of Fairford town;
 - Boundary walling along the street frontages, which, as originally intended, enclose and limit visibility of the former asylum buildings and its grounds;
 - Surviving 'garden' spaces, namely the lawn on the south side of Applestone
 Court and the outlying playing fields, which allude to the historic 'designed
 landscape' of The Retreat;
 - Extant functional associations between the various buildings of the complex,
 Coln House and Applestone Court having remained as 'primary' buildings supported by ancillary buildings, though conversion to school has altered the functions of the buildings from asylum to school

Impacts of proposed development

- 6.19. As has been made clear in the assessment above, the setting of Coln House has been irreversibly eroded by the wholesale conversion of the Site into a school during the 20th century. This has resulted in the almost total loss of the former 'airing grounds' of the asylum and they are not now intelligible and interpretable in any meaningful way. Thus the immediate setting of Coln House has ceased to make a positive contribution to the special historic interest of the building.
- 6.20. Survival of boundary and internal walling is a positive element of setting capable of offering some historic information on the former asylum, but given the way the Site has evolved over time, these elements of setting are somewhat isolated and so uninterpretable amongst the modern additions. Their retention in the proposed scheme, however, is positive as it preserves evidential and historic interest.
- 6.21. The scheme proposes a series of residential dwellings on the site of the former school and playground to the east of the site. The Site does not spill over into the playing fields which have been identified as making a positive contribution to historic interest; and in fact a small piece of land in the south-east tip of the site will

be given over to the playing field. Given the present physical and experiential character of the Site, the scheme results overall in a neutral change to setting, in the sense discussed above that the creation of the 20th century school site eroded the former asylum grounds to such an extent that they are now lost and have ceased making a contribution to our understanding of the Site and thus to special interest. Therefore the new development results in no change to this baseline modern (in reality semi-derelict) setting and no harm is found.

- 6.22. There is of course no change also to the physical and experiential streetscene setting of Coln House and Applestone Court to Milton Street (beyond actually a betterment resulting from refurbishment) and therefore no harm is found regarding this aspect of the scheme.
- 6.23. The above assessment identified that the gardens south of Applestone Court have remained as historic; that is open and largely undeveloped, and thus make a positive contribution to the significance of the non-designated asset in the sense that the former experience of this enclave has survived for ongoing interpretation. As part of the scheme, no development has been proposed for this space, therefore historic and aesthetic significance is preserved and there is no harm found.
- 6.24. In conclusion, the assessment has found that there is no harm to the historic, evidential and aesthetic interest of the heritage assets as a result of changes to their extant setting resulting from the proposed scheme.

7. DESIGN COMMENT AND RECOMMENDATIONS

- 7.1. Pre-application advice from Cotswold District Council concluded that the principle of development was acceptable but had some additional commentary as below. The full response is provided as Appendix 1; but can be summarised thus:
 - Subdivision of Coln House should be no more than is necessary and should minimise harm to its significance;
 - A two-storey extension to Coln House 'is unlikely to be acceptable';
 - Replacement of modern buildings to the east of Coln House 'seems not unreasonable in principle', but new development within the historic garden to the south-east of Coln House 'would be unwelcome';
 - Any lowering of the boundary wall to Cirencester Road 'would be harmful' and multiple openings 'would be uncharacteristic';
 - Some form of dwelling on the site of the external swimming pool [in the garden to the south-west of Applestone Court] 'seems reasonable in principle' but would need to be of appropriate design.
- 7.2. What follows is comment on these key points, informed by the findings of the robust assessments presented in Sections 3, 4 and 5 above.

Alterations and additions to Coln House and Applestone Court Coln House

- 7.3. Coln House falls into separate sections, identified as "Buildings" in the plans enclosed with the accompanying Historic Building Survey report. These sections should form the basis of any conversion or refurbishment and returning the plans of rooms to as near as possible to their forms in c.1850 should be the controlling framework of any conversions. However, the integration of the various floors and stairs means that vertical access would be a problem, for example from the first to second floors of Building 1. Lateral conversions in Buildings 1 and 2 may then need to be considered.
- 7.4. Partitions dating to the school period can generally be removed where required, as returning rooms to their pre-1948 form will generally count as an enhancement of the heritage significances. The loss of this evidential significance is not substantial harm, and, may overall be no harm.
- 7.5. New partitions are not ruled out, but their impact on heritage significances will need to be carefully thought out, justified and reversible. Some spaces should not be

subdivided, such as Building 1/G2 and Building 4/G1. Stairs ST1 and ST4 need to kept as open and unified as regulations will allow. The main room on the upper floor of Building 4 has already been partitioned into several smaller rooms sometime after 1956. Their rearrangement need have no harmful effects on the heritage significances, but their total removal would be an enhancement.

- 7.6. The landing on the top of ST3 could be redesigned if it could not be removed, as could the screen on the ground floor in ST4, both of which are post-1956.
- 7.7. While it would be ideal to remove the partitions in Building 3A/2.1-3, there is more flexibility here. For example, the corridor could be shortened and the eastern room made full-width and to occupy the entire width of the building. One other room could occupy the western end south of the shortened corridor. Bedrooms with en-suite bathrooms are also a possibility here.
- 7.8. The partitions on the upper floors of Building 2A are all late 20th-century and can be removed. The pre-1828 cross walls should be left and new rooms arranged around the presumption of their retention. The resultant spaces could be differently subdivided, however.
- 7.9. The remains of the winder stair should be left intact in any scheme.
- 7.10. Thought should be given to the reinstatement of pre-1948 fenestration in Building 2A, but this may not be practical. The removal of the porch and the windows would also be an enhancement architecturally but a loss evidentially. The balance is in favour of architectural significance.
- 7.11. Openings linking the separate buildings could be blocked if required. The ground floor corridor in Building 2B dates to the construction of Building 1 but its removal and the reinstatement of a version of the 1828 plan could be justified. Harm would be less than substantial.
- 7.12. The corridors in Building 3B are more difficult. They are slightly later (post 1849) additions to the building. The door and door frame into B3B/G2 appears to be early 20th-century, while that into G1 appears contemporary with the corridor. The removal, for example, of the east end of the south wall of this corridor and the closing of its access from ST4 would be less than substantial harm and would restore some of the plan form of G2. If access from Building 2 was also closed off, then a stair would have to be contrived in Building 3A or 3B to provide access to the

upper floors. This might be possible in the west end of Building 3A. In this case how Building 3 could be entered independently, would also require some thought.

- 7.13. Access and circulation within the buildings is likely to lead to the requirement for new openings, but these should be kept to an absolute minimum. It is most unlikely that new openings will be possible in the external walls, but the 1956 yard at the east end and Building 5 may offer possibilities. This might be modified or replaced to find some solutions for access.
- 7.14. It is most unlikely that external extensions to this range of buildings would be acceptable, but there might be some possibilities on the site of Building 5 for new build or extension to Building 4.

Applestone Court

- 7.15. Applestone Court is has been confirmed by the Conservation Officer has not being curtilage listed and is therefore a non-designated heritage asset. It is advised, however, to consider this building in the same light as Coln House to seek the best design solutions for the asset. As with Coln House it is very unlikely that external extensions would be acceptable. However, it might be possible to create a single-storey courtyard development at the west end of the range, incorporating the service wing and the single-storey 1930s room there. It might even be possible to add a floor, perhaps dormer style, to the shed on the Cirencester Road side of the wing and the old wash-house/later hobbies room south of it.
- 7.16. The Eastern Building is only one up and one down, but it might be possible to link it to the Street Range by a single-storey room along the inside of the eastern boundary wall. The Street Range could have its upper floor reinstated. The interiors here retain little of interest, but the conversion would have to be mitigated by appropriate record. Both of these conversions could be accessed and serviced via the Cirencester Road courtyard.
- 7.17. The structural divisions in the rear range of Applestone Court should be left in place on both floors, but the partitions within them are all recent and can be removed without damaging the heritage significances. The same goes for the subdivisions and later cupboards etc in the main, south range, but here such removal would be an enhancement.

Alterations to boundary wall

Cirencester Road

7.18. The tall boundary wall along the northern boundary of the western part of the Site presents a strong built frontage along the south side of this section of Cirencester Road. Its continuation as the Street Range and then the tall boundary wall along the west side of Horcott Road creates a strong sense of enclosure to the western part of the Site. The access point mid-way along the Cirencester Road frontage appears to have been created in the late-19th or early-20th century. It is considered that the entrance could be widened slightly, but the wall should not be lowered as its current height contributes to the character and appearance of this part of the Conservation Area.

Horcott Road (west)

7.19. The tall boundary wall along the west side of Horcott Road has been little altered since its construction in the 1830s. Together with the shorter section of wall of comparable height on the east side of Horcott Road, it alludes to the need for privacy and seclusion of The Retreat and creates a strong sense of enclosure on the approach to the Milton End crossroads. It is considered that this wall has a very low capacity for change. To demolish, lower, or create vehicular access points through this wall would result in harm to its significance and to the character and appearance of this part of the Conservation Area.

Horcott Road (east)

7.20. The integrity of the stretch of the boundary wall along the east side of Horcott Road beyond the Conservation Area boundary has already been compromised – by being lowered, damaged, unsympathetically repaired, and altered to create the access point for the former staff houses and school car park. Thus, it is considered that the entrance could be widened, by demolishing the splayed sections of lowered wall and part of the straight sections immediately to its west and east, without causing harm to the significance of this stretch of wall or of the Conservation Area.

Demolition of modern buildings and construction of modern housing Eastern part of the Site

7.21. The modern classroom buildings in the eastern part of the Site are of limited significance in and of themselves and do not contribute either to the significance of either Coln House or Applestone Court or to the character or appearance of Fairford Conservation Area. As such, their demolition would cause no harm to any of these designated heritage assets.

- 7.22. Prior to the construction of the aforementioned classroom buildings, the grounds of Coln House comprised walled gardens and an exercise field. There is opportunity to restore elements of the 'designed landscape' by reducing the extent of tarmac and hardstanding and reinstating garden spaces specifically, to the south of Coln House, which, with the House, is the only area of the eastern part of the Site that lies within the Conservation Area.
- 7.23. It is advised that the existing car park is redeveloped as green space, specifically: a walled or formal garden, its boundaries comprising the wall to Horcott Road and the parallel historic wall sited to the west of the classroom cabins. This would reinstate an aspect of the historic designed landscape of Coln House and would enhance the significance of Coln House as well as the character and appearance of this part of the Conservation Area. Such a design measure would be perceived as a heritage benefit. Failing that, car parking should be designed with areas of soft edging and greenery (trees, shrubs etc) and an appropriate coloured surface such as resin bound gravel in a locally appropriate colour, in order to retain an open green character to the car parking areas.
- 7.24. New buildings would be most appropriately placed where there is a precedent for development, i.e. on the footprint of the modern classroom buildings. They should be of a suitable scale, massing and design that would be subservient to Coln House and would not detract from the ability to appreciate its special architectural and historic interest. The proposed placement of houses set back from the road frontage is not characteristic of the historic development pattern along Milton Street; but would in all likelihood help maintain the prominence of Coln House within the streetscape.

Western part of the Site

7.25. There is no historical precedent for substantial built development in the gardens to the rear of Applestone Court. It is considered that this part of the Site accordingly has low capacity for change; however, the south-western area occupied by the swimming pool could accommodate a small dwelling of an appropriate design.

8. ASSESSMENT OF IMPACTS (SCHEME AS OF SEPT 2020)

Coln House redevelopment: physical impacts

- 8.1. The interior of Coln House is proposed to be converted into 7 dwellings, incorporating a mix of flats, maisonettes and houses.
- 8.2. The following table details the proposed changes to each section of the building, these are labelled according to the terminology used in this assessment but a reference is made to the 'Plot' number of the dwelling where applicable and to aid understanding. The table also includes an assessment of general principles and approaches to conversion and refurbishment where they are relevant to impact/s.

Assessment of direct impact - Coln House

Building	Proposed work/s	Discussion	Type and level of impact
Exterior works to building group	Insertion of secondary glazing to windows	Installation of secondary glazing fulfils the requirements for energy saving whilst also ensuring the historic windows are retained and conserved for ongoing appreciation. They will remain as currently seen externally but there will be a slight change to the experience of the window openings internally. This will not result in any harm to significance as the windows are still present and interpretable	No harm
General approach	Sensitive refurbishment and like for like repair of historic features such as windows, shutters, mantelpieces, plasterwork and panelled doors where they exist. Replacements where needed will be replicas. External stonework will be repaired where needed with appropriate conservation grade material	The scheme will adopt a conservation focussed approach to conversion and repair which will in general sustain and enhance the features and fixtures of the heritage assets	Enhancement
	The entrance to Coln House from Horcott Road is to be altered to accommodate vehicle splays, the wall is to be taken down and rebuilt in the	The extensive walls that encircle the site have been identified as having specific historic and evidential value. The gateway section is a low section of wall with modest and unremarkable rubble piers topped with what looks to be concrete moulded capping. The above	No harm

Building	Proposed work/s	Discussion	Type and level of impact
External boundary walls	retained materials with a slightly different orientation	assessment finds capacity for change in this section of wall. The reconfiguration of the gateway area will remove a small section of wall and rebuild it like for like, therefore no evidential fabric will be lost. The orientation and experience of the gateway has not been identified as having any special significance and aesthetic value. Therefore the proposal will not result in any loss of legibility or interpretation of this historic wall or the contribution it makes to the streetscene and the historic site	
Building 1 (Plot 1) converted to a 5-bed house (interior)	Insertion of winder staircase to second floor. Removal of modern subdivision of first floor rear room and reinstatement of differently aligned partition to create bathroom, same arrangement to second floor	The partitions that are being removed are modern and had awkwardly divided this large room into smaller sections. The introduction of a winder staircase to the third floor and the creation of a small bathroom adjacent makes good sense of this space and allows for the building to become a single dwelling once again, with access to all floors. Floor plan legibility is improved and readily interpretable.	No harm
As above	Removal of screen to top of staircase at first floor level	Removal of the corridor screen returns the staircase (identified as a significant feature) to its original openness	Slight enhancement
Building 1 (exterior)	Removal of external fire escape and reinstatement of window in fire escape door	The removal of the fire escape will enhance the appearance and legibility of the rear elevations across the building group and reinstatement of a like for like window in place of a fire escape door is entirely beneficial.	Enhancement
Building 2 (Plot 2)	Removal of extensive modern subdividing partitions in rooms B2BG1, B2AG3, B2AG1, B2A1.1, B2A1.1, B2A1.1, B2A1.2	Generally speaking, the removal of these partitions, which in some cases were extremely harmful, will return these rooms to their former plan form. Legibility of these rooms as originally constructed will be interpretable.	Enhancement
As above	Reinstatement of eastern party walls to Building 3 in room B2BG2 and those above	Lateral conversion has been an historic feature of this building, however the openings into Building 3, particularly on the ground floor, are clearly later interventions. Reinstatement of this party wall results in heritage benefit in returning this building to its original plan form prior to lateral conversion.	Enhancement
As above	Subdivision of Room B2BG2, B2B1.2 and B2B.2.2 to form lavatory/bathroom and store and creation of a small lobby in B2A1.2	Overall, the removal of extensive subdividing partitions in other areas of this building outweighs the very small amount of harm stemming from this limited intervention, which ensures the building can be converted for ongoing	No net harm

Building	Proposed work/s	Discussion	Type and level of impact
		viable use	
Building 3 and 4 (Plots 3 and 6)	Reinstatement of party walls to all sides of building envelope where openings exist	Reinstatement of the original plan form (though clearly lateral conversion followed quickly after), results in enhancement via an increased understanding of the building as a discrete and phased entity of the overall group	No harm
As above	Removal of subdividing partitions to B4 corridor, B3AG1, B3B1.1 and the room above B3A1.1.	As above, removal of modern partitions are beneficial returning rooms to original or historic plan form and enhancing legibility. In particular the removal of the corridor screen to the main staircase hall (ST4) on the ground floor is beneficial, returning this hallway to one open space	Enhancement
As above	Insertion of partition to create bathroom in B3AG1.	This room had already been subdivided and it is proposed to remove the partition (as above) and reinstate in a different position. The net result from the baseline experience of the room is no further harm	No harm
As above, Plot 6	Subdivision of front facing room (B3A1.1) on first floor to create two bedrooms and associated lobby. Removal of partitions in room above	The subdivision of this room (which has not been subject to modern intervention) will cause a small amount of harm to significance through the loss of floor plan legibility. However the removal of subdivisions in the room above results in an enhancement in the opening out the space and reinstatement of floor plan (the assessment finds it had been divided relatively recently) and thus can outweigh the harm found from the subdivision discussed above	Net no harm
As above, Plot 6	Removal of partition and its reinstatement in a slightly different orientation to the create a bathroom	Given the precedent for subdivision, the re-configuration does not bring any additional harm	No harm
Building 4 (rear element), Plot 7	Subdivision of large rear room to form 1 bed flat	This room has not been historically divided and retains a fireplace at each end with stained glass windows addressing the corridor. The openness of the room is noted in the buildings assessment and its subdivision will bring a small amount of harm to the significance of this part of the building	Less than substantial (lower end)
Building 4, Plot 7	Some remodelling (infill of doorways and creation of doorways)	This conversion works largely with extant modern subdivisions to create the flat and thus results in no additional harm	No harm

Building	Proposed work/s	Discussion	Type and level of impact
(first floor)	to create a 2-bed flat		
Building 5	Creation of a 2-bed house	This building was constructed in 1956 and as such as little significance beyond its attachment to the principal range	No harm

Table 8.1 Summary of level and type of heritage impact of proposals

Summary of physical impacts

- 8.3. As the above assessment has indicated, in net overall terms the impact of the proposed works will be positive and will enhance the significance of the listed building. Part of the intrinsic character and purpose of this Building is one of evolution to suit changing institutional needs and this 'layer' of adaptation to a complementary residential use looks to conserve and reinvigorate the Building whilst reversing some of the poorer quality insertions and adaptations that have compromised historic and architectural value over the recent past years. In this scheme, some historic fabric and plan form will be better revealed, as will the Building itself in an active new use with upgraded facilities fit for 21st century occupation. In particular, several subdivided rooms will be restored to their original proportions which represents heritage benefit. Where modern insertions or subdivisions are proposed, they are legible and limited to the minimum necessary.
- 8.4. Thus this assessment fulfils the requirements of paragraphs 189 and 190 of the NPPF regarding the provision of proportionate information and assessing the significance of heritage assets potentially affected by development. Weighing the specific small harms and benefits set out in Table 5.1 above, it is considered that an overall level of **no harm** is found to result of the proposals. In terms of paragraph 192 of the NPPF, the proposals fulfil the criteria to 'sustain and enhance the significance of heritage assets and putting them to viable uses consistent with their conservation'.

Applestone Court redevelopment: physical impacts

8.5. The proposals involve the conversion of Applestone Court into 4 individual dwellings, to include an extension to accommodate a staircase and rationalisation/demolition of various 20th century outbuildings to simplify the setting.

Assessment of direct impacts – Applestone Court

Building	Proposed work/s	Discussion	Type and level of impact
General approach	Retention, sensitive refurbishment and like for like repair of historic features such as windows, shutters, mantelpieces, plasterwork and panelled doors where they exist	The scheme will adopt a conservation focussed approach to conversion and repair which will sustain and enhance the heritage assets	Enhancement
Exterior – Plot 3	Removal of external fire escape stairs and erection flat roofed extension and addition of 3 storey extension to western gable of main building to house a stairwell serving all floors of Plot 3	The DAS highlights how the new stairwell is required to provide access to upper floors without disturbing the proportions or plasterwork of Room G9. The stairwell replaces an unsightly external set of fire stairs, the loss of which comprises an enhancement. The loss of the stairs will also mean the first-floor door in the bay can be restored to a window as original. Given the stairwell replaces a one storey flat roofed structure, the net new impact will stem from the view of the upper storeys. This will change the appearance of the front (south) elevation, however given this elevation does not appear to be designed composition, the impact is lessened. The building is not listed, and its architectural merit has been assessed as being limited, being a row of plain terraced houses with vernacular features. On this basis the addition of a readably modern and sensitively designed extension would cause a minimal amount of harm as to be almost negligible. As per para 197 of the NPPF this can be weighed in the balance of scale of harm versus significance	Small level of harm
Exterior – frontage buildings and area	Removal of modern outbuildings and extension to the two truncated cottages. Cottages to be unconverted and left as bin and cycle stores for the residents.	The two frontage cottages were examined as part of the building assessment. The pre-date the main building and have clearly lost their upper floors, they have had a number of different uses including a stable at one point. The proposals look to remove extraneous clutter around the cottages to reveal their original, though truncated, proportions. This is beneficial, as is the removal of modern shed style structures	No harm
Plot 1 – G1 – G5 and floors above	Subdivision of Room G2 to create a lavatory and store with a new doorway to the hall	There is a small level of harm to historic value inherent the subdivision of this room, which was once an inmates' 'day room'. This is not mitigated by any enhancement work within the ground floor of this proposed dwelling but is likely	Small level of harm

Building	Proposed work/s	Discussion	Type and level of impact
		to be when considered in the round with the enhancements on the upper floors	
As above	Removal of subdivision of the stair hallways at first floor level	This is beneficial and will open out this space for greater appreciation of its proportions	Enhancement
As above	Removal of modern partitions in Rooms 1.1 and 1.8 on first floor (front and bedroom). Infill of party walls	This is beneficial, the room will be restored to its former proportions	Enhancement
As above	Removal of subdivisions in Room x and 1.5, 1.1, 1.19, 1.20, 1.21 and 1.22 and reconfiguration to create a hallway and two bathrooms. Creation of opening between 1.5 and 1.1	Overall, modern partitions have decreased the legibility of these rooms. Their reconfiguration will change the already altered layout, therefore no further harm is found	No harm
As above	Removal of modern corridor partitions in second floor room and reinstatement of party wall	This element returns the room to its former proportions and is therefore beneficial	Enhancement
Plot 2 – Rooms G6- G8 and ST2 and above	Removal of subdivision in G20-21	It is not clear what original function this small room had, being a rear area of the building, however removal of subdivision will open it out and allow its overall proportions to be appreciated	No harm
As above	General reinstatement of party walls between Plots 1 and 3	To recreate self-containment of what was probably originally a row of self-contained cottages. Whilst loss of lateral conversion may impact on the legibility of how the asylum functioned, this impact is thought to be negligible given the buildings have undergone much change as a school after the asylum phase	No harm
As above	Removal of subdivisions in Rooms 1, 1.7 and 1.23 and 1.10,1.14, 1.17 and 1.18	As with other removal of modern partitions, this opens out the spaces to become more readable and is overall beneficial	Enhancement
As above	Removal of subdivision of second floor room and staircase hall, removal of WC's from under eaves	Both rooms will be open to their original proportions and as such this is an enhancement	Enhancement
Plot 3 – Rooms G9-	Subdivision of hall to provide internal WC	This hallway may have been created from an historic subdivision of G12 given the incongruous placement of the fireplace in a back stairs circulation area, In the mid-20 th century plans it is labelled as store. It clearly has not functioned or	No harm

Building	Proposed work/s	Discussion	Type and level of impact
G13 and above		been experienced as hall for some considerable time and has been altered over time. For that reason no harm is found	
As above	Subdivision of principal bedroom (bay room) on first floor to create lobby from new stairwell and bathroom	Whilst this room is understood to be plainer than the ground floor, the loss of the openness of the space will impact on plan form legibility and create a small level of harm	Small level of harm
Plot 4 (rear one storey service wing)	Infill of two later doorway openings	Necessary for self-containment	No harm

 Table 8.2
 Summary of level and type of heritage impact of proposal

Summary of physical impacts

- 8.6. As with Coln House, the net overall impacts of proposals to this non-designated heritage asset, when considered in the round, are positive. Harmful former subdivisions, particularly on upper floors, are being removed and any new partitions are legible and kept to the minimum. The openness of principal rooms is retained and the general approach is to conserve and repair the building whilst putting it to an optimum use. The removal of poor-quality structures and clutter related to the years of institutional use rationalise and better reveal the frontage and courtyard areas.
- 8.7. Thus, again this assessment fulfils the requirements of paras 189 and 190 of the NPPF, providing proportionate information on the heritage assets and their significance. Weighing both the specific small harms and enhancements as set out in Table 5.2 above, the proposals are considered to result in an overall level of no harm. Again, in terms of paragraph 192 of the NPPF, the proposals are considered to fulfil the criteria to 'sustain and enhance the significance of heritage assets and putting them to viable uses consistent with their conservation'.

Summary of non-physical impacts of the development on the character and appearance of the conservation area and the setting of the listed buildings

- 8.8. Chapter 5 has set out an analysis of the character and significance of the Conservation Area, and the potential effects of the change engendered from the development proposals. Chapter 6 has analysed the setting of Coln House and Applestone Court, and again examined the relevance of the proposed changes.
- 8.9. Overall, it is considered that the general improvements and regeneration of the Coln House section of the Site will improve both the appearance of the conservation area

and its setting, and will not lead to any harm to the heritage significance of the listed buildings. With regard to Applestone Court, the removal of extraneous modern clutter to the street frontage and courtyard areas of the building, and a general upgrade to these areas, combined with the refurbishment of the building, will improve the appearance of this building and the contribution it makes to the conservation area.

- 8.10. There is no change to the physical and experiential streetscene setting of Coln House and Applestone Court to Milton Street (beyond actually a betterment resulting from refurbishment) and therefore no harm is found regarding this aspect of the scheme.
- 8.11. The setting of Coln House has been irreversibly eroded by the wholesale conversion of the Site into a school during the 20th century. This has resulted in the almost total loss of the former 'airing grounds' of the asylum and they are not now intelligible and interpretable in any meaningful way. Thus the immediate setting of Coln House has ceased to make a positive contribution to the special historic interest of the building.
- 8.12. Survival of boundary and internal walling is a positive element of setting capable of offering some historic information on the former asylum, but given the way the Site has evolved over time, these elements of setting are somewhat isolated and so uninterpretable amongst the modern additions. Their retention in the proposed scheme, however, is positive as it preserves evidential and historic interest.
- 8.13. The scheme proposes a series of residential dwellings on the site of the former school and playground to the east of the site. The Site does not spill over into the playing fields which have been identified as making a positive contribution to historic interest; and in fact a small piece of land in the south-east tip of the site will be given over to the playing field. Given the present physical and experiential character of the Site, the scheme results overall in a neutral change to setting, in the sense discussed above that the creation of the 20th century school site eroded the former asylum grounds to such an extent that they are now lost and have ceased making a contribution to our understanding of the Site and thus to special interest. Therefore the new development results in no change to this baseline modern (in reality semi-derelict) setting and no harm is found.

- 8.14. The gardens south of Applestone Court have remained as historic; that is open and largely undeveloped, and thus makes a positive contribution to the significance of the non-designated asset in the sense that the former experience of this enclave has survived for ongoing interpretation. As part of the scheme, no development has been proposed for this space, therefore historic and aesthetic significance is preserved and there is no harm found.
- 8.15. It is therefore concluded that the proposals will result in an enhancement to the character and appearance of the Fairford Conservation Area, and to its setting, which accords with the provisions of Section 72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act. The proposals will also preserve the significance of the listed buildings and their setting, a consideration which requires 'special regard' in Section 66 of the same Act. Positive qualities of the conservation area are retained, whilst the general approach to development of the Site, which includes retention of green open space and a lack of over-development, will allow this scheme to bring positive placemaking, improving and contributing to the vitality of the town.

9. CONCLUSIONS (2020)

- 9.1. This report has focused on establishing the built heritage constraints and opportunities of redevelopment for the Coln House site. Specific objectives in the original work of 2018 were to understand the significance of the historic buildings within the Site (principally: Coln House and Applestone Court), to establish the contribution of the Site to the character and appearance of Fairford Conservation Area, and to ascertain whether the Site is an element of the setting of any designated heritage asset that contributes to its significance. The final task in 2018 was to provide advice and recommendations on the optimum heritage-led approach to the conversion of the building and development of the site and, where appropriate, to recommend measures to avoid and/or to mitigate harm to built heritage.
- 9.2. The design team have demonstrably utilised the assessment provided in 2018 to underpin and inform their approach to the design of the new development, this has resulted in a heritage-led scheme that conserves the significance of both Coln House and Applestone Court whilst also ensuring their regeneration and ongoing viable and active use. Of note here is the desire of the design team to 'treat' Applestone Court with a similar approach to the listed Coln House; with the specific objective of maintaining the significance of the non-designated heritage asset. The impact assessment conducted in 2020 has found that **no harm** is present in the proposals for the buildings, and actually, in net overall terms, the impact of the proposed works will be positive and will sustain and enhance the heritage assets inline with paragraph 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 9.3. The report has also concluded that the proposals will result in an enhancement to the character and appearance of the Fairford Conservation Area, and to its setting, which accords with the provisions of Section 72 of the 1990 Planning (Listed Buildings and Conservation Areas) Act. Positive qualities of the conservation area are retained, whilst the general approach to development of the Site, which includes a retention of green open space and a lack of over-development, will allow this scheme to bring positive placemaking, improving and contributing to the vitality of the town.

10. REFERENCES

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1828	Plan of grounds and yard for female lunatics [Q/AL/38/4/3]
1829	Plan for a female asylum [Q/AL/38/4/4]
1834	Plan of part (ground, first and second floors) being an addition to the
	lunatic asylum [Q/AL/38/4/5]
1849	General plan of the lunatic asylum conducted by Alexander Iles & Sons
	[Q/AL/38/4/8]
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1840	Tithe Map for Fairford
1877–82	Ordnance Survey County Series for Gloucestershire, 1:2,500
1902–03	Ordnance Survey County Series for Gloucestershire, 1:2,500
1921–23	Ordnance Survey County Series for Gloucestershire, 1:2,500
1960	Ordnance Survey Plan, 1:10,560
1977	Ordnance Survey Plan, 1:2,500
1979–82	Ordnance Survey Plan, 1:10,000

The Genealogist <u>www.thegenealogist.co.uk,</u> Old Maps <u>www.old-maps.co.uk,</u>
Promap <u>www.promap.co.uk</u>

APPENDIX 1: PRE-APPLICATION ADVICE (RELEVANT EXTRACT)

2. Design/ Impact on the Listed Building and Historic Environment

Coln House School is a Grade II Listed building. Founded as The Retreat, a private asylum, in 1822 by Alexander Iles, extended 1829 and became school for ESN children in 1949. The Local Planning Authority is therefore statutorily required to have special regard to the desirability of preserving the building, its setting, and any features of special architectural or historic interest it may possess, in accordance with Sections 16(2) and 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

The site also lies within the Fairford Conservation Area, wherein the Local Planning Authority is statutorily obliged to pay special attention to the desirability of preserving or enhancing the character or appearance of the area, in accordance with Section 72(1) of the above Act.

Section 7 of the NPPF requires good design. Paragraph 58 states that decisions should ensure that developments: function well in the long term and add to the overall quality of an area; establish a strong sense of place, creating attractive and comfortable places; and respond to local character and history, reflecting the identity of the surroundings and materials, whilst not stifling innovation. Paragraph 60 states that local distinctiveness should be promoted or reinforced and Paragraph 61 that connections between people and places, with the integration of new development into the built and historic environment.

Section 12 of the NPPF asks that Local Planning Authorities should take account of the desirability of sustaining or enhancing the significance of heritage assets. Under the NPPF Conservation Areas are considered to be designated heritage assets. Paragraph 132 states that when considering the impact of the proposed works on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It also states that significance can be harmed through alteration or development within the setting. Paragraph 134 states that where proposals will cause harm to the significance of a designated heritage asset that is less than substantial harm, that harm is weighed against the public benefits of those works.

Policy 15 (Conservation Areas) of the Local Plan¹ states that development in a Conservation Area must preserve or enhance the character or appearance of the area as a whole, or any part of that area. It states that development will be permitted unless: new or altered buildings are out-of-keeping with the special character or appearance of the area in general or in a particular location (in siting, scale, form, proportions, design or materials); or there would be the loss of open spaces that make a valuable contribution.

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¹ The Local Plan referred to in this pre-app has been superseded by the Adopted 2018 Local Plan after receipt of the pre-app advice

Policy 42 (Cotswold District Design Code) of the Local Plan requires that development should be environmentally sustainable and designed in a manner than respects the character, appearance and local distinctiveness of the Cotswold District with regard to style, setting, harmony, street scene, proportion, simplicity, materials and craftsmanship.

Policy 45 (Landscaping) of the Local Plan requires high standards of appropriate landscaping in all developments and any attractive, existing landscape features, such as trees, hedgerows and other wildlife habitats should be retained and integrated into all landscaping schemes.

The new Design Code (Appendix D within the eLP) reinforces and expands upon these principles. D.9 states that development should respond to its context, and its specific townscape setting. There

should be close attention to the site and its setting, in determining the overall principle, density and grain, scale and form of new buildings (D.14). D.17 states that excessive or uncharacteristic bulk should be avoided. Whatever the architectural approach (vernacular or contemporary), any design should respond to its context and to local distinctiveness. A high quality of materials, details and finishes is also expected.

Any works to the listed building, curtilage structures or within its historic curtilage should be informed by a robust and impartial statement of significance that assesses the architectural evolution and significance of the site.

Any subdivision of the listed building should be the minimum necessary to secure the viable future of the building & minimise harm to significance (through, for example, the physical and spatial impacts of compartmentalisation). Any proposals should work with the 'grain' of the building.

A two-storey rear extension onto the listed building, adjacent to Horcott Road is unlikely to be acceptable.

The historic garden, to the south-east of the listed building forms an important part of its setting, and any built development here would be unwelcome. However, there would be no objection in principle to a mix of communal gardens and softer car parking (with a minimum of hard surfaces, simple edge treatments, and integrated sympathetic planting).

The area to the east of the listed building currently contains modern school buildings, so some degree of replacement development in this location seems not unreasonable in principle. However the boundary wall between this area and Cirencester Road appears historic (and conforms to early OS maps), and comprises curtilage-listed fabric. The strong nature of the boundary is both appropriate to such an enclosing wall between a garden

space and a road, and contributes positively to the significance of the listed building and to the character and appearance of the conservation area. Any lowering of this wall would be harmful. The provision of a single, pedestrian gateway of appropriate design would not be an uncharacteristic feature, but multiple openings would be uncharacteristic.

The buildings that lie on the west side of Horcott Road are separated from the listed building by the highway; they therefore do not fall within the latter's curtilage. Nonetheless they still comprise non-designated heritage assets within the designated conservation area.

Any external alterations therefore should still be based upon an appropriate assessment of their significance.

The moving of the vehicular entrance to the west would entail disruption to a substantial boundary wall that is a key feature of this part of the conservation area, and is unlikely to be acceptable.

Some form of dwelling on the site of the existing external swimming pool seems reasonable in principle, but the character of this should be modest in scale and height, of broken massing, and sympathetic to its 'edge-of-settlement' location.

It is recommended that the applicant contacts the Council for further pre-application discussions before submitting an application. The impact on the heritage assets will be given great weight in the planning balance when determining any application.

APPENDIX 2: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Listed Buildings

Listed Buildings are buildings of 'special architectural or historic interest' and are subject to the provisions of the <u>Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act')</u>.

Under <u>Section 7</u> of the Act, 'no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.' Such works are authorised under Listed Building Consent.

Under <u>Section 66</u> of the Act, 'In considering whether to grant planning permission 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 feature of special architectural or historic interest which it possesses'.

Note on the extent of a Listed Building

Under <u>Section 1(5)</u> of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948.

The inclusion of a structure deemed to be within the 'curtilage' of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of 'heritage significance' both as defined within the NPPF and within 'Conservation Principles' (see Section 3, above). In such cases, the establishment of the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the 'Listed Building' (to include the building in the list and all the ancillary items) where they affect the special character of the Listed Building as a whole.

Guidance is provided by Historic England on '<u>Listed Buildings and Curtilage: A Historic England Advice Note</u>' (Historic England 2016).

Heritage Statute: Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires that 'Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. Section 72 of the Act requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

The requirements of the Act only apply to land within a Conservation Area; not to land outside it. This is set out within 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' (see below) which states that 'In primary legislation, the setting of Conservation Areas is not a statutory duty' (page 5). This fact is also clarified in various Appeal Decisions (for example APP/F1610/A/14/2213318 Land south of Cirencester Road, Fairford, Paragraph 65: 'The Section 72 duty only applies to buildings or land in a Conservation Area, and so does not apply in this case as the site lies outside the Conservation Area.').

The NPPF (2018) also clarifies in <u>Paragraph 201</u> that 'Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance'. Thus land or buildings may be a part of a Conservation Area, but may not necessarily be of architectural or historical significance. Similarly, not all elements of the setting of a Conservation Area will necessarily contribute to its significance, or to an equal degree.

National heritage policy: the National Planning Policy Framework

Heritage assets and heritage significance

Heritage assets comprise 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' (the NPPF, Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields, and Conservation Areas (designated under the relevant legislation; NPPF, Annex 2). The NPPF, Annex 2, further states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principles' looks at significance as a series of 'values' that include 'evidential', 'historical', 'aesthetic' and 'communal'.

The setting of heritage assets

The 'setting' of a heritage asset comprises '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.' (NPPF, Annex 2). Thus it is important to note that 'setting' is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', which has been utilised for the present assessment (see below).

Levels of information to support planning applications

Paragraph 189 of the NPPF identifies 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.'

Designated heritage assets

Paragraph 184 of the NPPF notes that local planning authorities 'should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.' Paragraph 193 notes 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'.

Paragraph 194 goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage 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.'

<u>Paragraph 196</u> clarifies 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.'

Substantial harm and less than substantial harm

See 'Effects upon heritage assets', below.

Effects upon non-designated heritage assets

See 'Effects upon heritage assets', below.

Local heritage policy: Cotswold District Local Plan

The Cotswold District Local Plan 2011–2031 was adopted on 3rd August 2018. Policies relevant to the historic environment are as follows:

Policy EN1 Built, Natural and Historic Environment

'New development will, where appropriate, promote the protection, conservation and enhancement of the historic and natural environment by:

- a. ensuring the protection and enhancement of existing natural and historic environmental assets and their settings in proportion with the significance of the asset;
- b. contributing to the provision and enhancement of multi-functional green infrastructure;
- c. addressing climate change, habitat loss and fragmentation through creating new habitats and the better management of existing habitats;
- d. seeking to improve air, soil and water quality where feasible; and
- e. ensuring design standards that complement the character of the area and the sustainable use of the development.'

Policy EN2 Design of the Built and Natural Environment

'Development will be permitted which accords with the Cotswold Design Code (Appendix D). Proposals should be of design quality that respects the character and distinctive appearance of the locality.'

Policy EN4 The Wider Natural and Historic Environment

- '1. Development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas.
- 2. Proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets.'

Policy EN10 Historic Environment: Designated Heritage Assets

'1. In considering proposals that affect a designated heritage asset or its setting, great weight will be

given to the asset's conservation. The more important the asset, the greater the weight should be.

2. Development proposals that sustain and enhance the character, appearance and significance of

designated heritage assets (and their settings), and that put them to viable uses, consistent with their

conservation, will be permitted.

3. Proposals that would lead to harm to the significance of a designated heritage asset or its setting

will not be permitted, unless a clear and convincing justification of public benefit can be

demonstrated to outweigh that harm. Any such assessment will take account, in the balance of

material considerations:

the importance of the asset;

the scale of harm; and

the nature and level of the public benefit of the proposal.'

Policy EN11 Historic Environment: Designated Heritage Assets – Conservation Areas

'Development proposals, including demolition, that would affect Conservation Areas and their

settings, will be permitted provided they:

a. preserve and where appropriate enhance the special character and appearance of the

Conservation Area in terms of siting, scale, form, proportion, design, materials and the retention of

positive features;

b. include hard and soft landscape proposals, where appropriate, that respect the character and

appearance of the Conservation Area;

c. will not result in the loss of open spaces, including garden areas and village greens, which make a

valuable contribution to the character and/or appearance, and/or allow important views into or out of

the Conservation Area;

d. have regard to the relevant Conservation Area appraisal (where available); and

e. do not include internally illuminated advertisement signage unless the signage does not have an

adverse impact on the Conservation Area or its setting.'

Policy EN12 Historic Environment: Non-Designated Heritage Assets

'1. Development affecting a non-designated heritage asset will be permitted where it is designed

sympathetically having regard to the significance of the asset, its features, character and setting.

- 2. Where possible, development will seek to enhance the character of the non-designated heritage asset. Proposals for demolition or total loss of a non-designated heritage asset will be subject to a balanced assessment taking into account the significance of the asset and the scale of harm or loss.
- 3. The assessment of whether a site, feature or structure is considered to be a non-designated heritage asset, will be guided by the criteria set out in Table 6.'

Policy EN13 Historic Environment: The Conversion of Non-Domestic Historic Buildings (Designated and Non-Designated Heritage Assets)

- '1. Proposals for the conversion of non-domestic historic buildings to alternative uses will be permitted where it can be demonstrated that:
- a. the conversion would secure the future of a heritage asset, and/or its setting, which would otherwise be at risk:
- b. the proposed conversion would conserve the significance of the asset (including its form, features, character and setting;
- c. the heritage asset is structurally sound; and
- d. the heritage asset is suitable for, and capable of, conversion to the proposed use without substantial alteration, extension or rebuilding which would be tantamount to the erection of a new building.
- 2. Proposals to extend or alter heritage assets that have been converted, will be permitted where it can be demonstrated that the proposed works would preserve the significance of the asset (including its form and features), its setting and/or the character or the appearance of the surrounding landscape in a manner that is proportionate to the significance of the asset.'

Good Practice Advice 1-3

Historic England has issued three Good Practice Advice notes (GPA1–3) which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment'.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing 'heritage significance' as part of the application process, stating that: 'understanding the nature of the significance is important to understanding the need for and best means of conservation.' This includes assessing the extent and level of significance, including the contribution made by its 'setting' (see GPA3,

below). GPA2 notes that 'a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so'.

GPA3 – The Setting of Heritage Assets

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as 'the surroundings in which a heritage asset is experienced'.

Step 1 of the settings assessment requires heritage assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets 'where that experience is capable of being affected by a proposed development (in any way)...'.

Step 2 of the settings process 'assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated, with regard to its physical surroundings; relationship with its surroundings and patterns of use; the contribution of noises, smells etc. to significance; and the way views allow the significance of the asset to be appreciated.

Step 3 involves 'assessing the effect of the proposed development on the significance of the asset(s)' – specifically, 'the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it' with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on 'ways to maximise enhancement and avoid or minimise harm'. It notes that 'Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project's inception'. It goes on to note that 'good design may reduce or remove the harm, or provide enhancement'.

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. Regarding Listed Buildings and Conservation Areas, it primarily discusses 'architectural and historic interest', which comprises the special interest for which they are designated.

The NPPF provides a definition of 'significance' for heritage policy (Annex 2). This states that heritage significance comprises 'The value of a heritage asset to this and future generations

because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'.

Regarding 'levels' of significance, the NPPF provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England's 'Conservation Principles' expresses 'heritage significance' as comprising a combination of one or more of the following values: evidential; historical; aesthetic; and communal.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 200 of the NPPF (2018) notes 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 or better reveal the significance of the asset should be treated favourably'.

Paragraph 28 of GPA3 notes that 'good design may reduce or remove the harm, or provide enhancement'. Paragraph 84 of 'Conservation Principles' states that 'Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced'.

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in 'Conservation Principles'.

Heritage harm to designated heritage assets

The NPPF (2018) does not define what constitutes 'substantial harm'. The High Court of Justice does provide a definition of this level of harm, set out by Mr Justice Jay in 'Bedford Borough Council vs. SoS for CLG and Nuon UK Ltd'. Paragraph 25 clarifies that, with regard to 'substantial harm': 'Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'.

Effects upon non-designated heritage assets

Paragraph 197 of the NPPF (2018) guides that 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

APPENDIX 3: GAZETTEER OF SELECTED HERITAGE ASSETS RECORDED WITHIN THE STUDY AREA

Our Ref.	HE Ref. HER Ref. HEA Ref.	Description	Grid Ref. (all SP)	
LISTED BUILDINGS				
Α	No ref.	Fairford Conservation Area	See Fig. 2	
В	1172655	Grade II Listed Building of Coln House, built c.1820.	1481 0091	
С	1089991	Grade II Listed Building of Ivy Villa, built late-18th century.	1472 0084	
D	1341023	Grade II Listed Building of The Old Tracey, built 1607 with later alterations.	1476 0092	
E	1172217	Grade II Listed Building of 1 Coronation Street, built late-18th century.	1477 0094	
F	1172224	Grade II Listed Building of 2, 3 and 4 Coronation Street, built late- 18th century.	1475 0093	
G	1341016	Grade II Listed Building of 1, 2 and 3 Milton Street, built in the late-17th or early-18th century.	1479 0093	
н	1172633	Grade II Listed Building of Milton House, built in the early-18th century.	1482 0094	
I	1089983	Grade II Listed Building of Hampton Cottage, built in the late-18th or early-19th century.	1484 0095	
J	1172645	Grade II Listed Building of Draycott, built in the early-19th century.	1484 0095	
к	1341017	Grade II Listed Building of Tudor House, built in the late-16th or early-17th century.	1487 0096	
L	1089984	Grade II Listed Building of Tudor Cottage, built in the late-18th century as an extension to Tudor House.	1488 0096	
М	1089985	Grade II Listed Building of Annerley, built in the late-18th century.	1490 0095	
N	1172664	Grade II Listed Building of The Manse, built in the late-18th or ealy-19th century and associated with [O].	1491 0095	
0	1341018	Grade II Listed Building of Fairford United Church, built in 1853.	1493 0094	
Р	1089998	Grade I Listed Building of St Mary's Church, built from the early-15th century onwards.	1515 0116	
Q	1172590	Grade II Listed Building of The Chanting House, built from the early-15th century onwards.	1518 0101	
R	1089990	Grade II Listed Building of The White Hart, reputedly founded in the late-15th century but fabric mostly 17th century and later.	1517 0100	
s	1089979	Grade II Listed Building of The Bull Hotel, built from the late-16th century onwards.	1517 0103	
Т	1089970	Grade II Listed Building of Morgan Hall, built in the late-16th	1579 0105	

		century.		
U	1341048	Grade II Listed Building of Manchester House, built in the early-17th century.	1522 0109	
v	1341022	Grade II Listed Building of Fairford House, built in the mid-18th century to replace a 15th century house.	1515 0111	
w	1341047	Grade II Listed Building of Police Station and Magistrate Court, built in 1860.	1522 0113	
X	1089969	Grade II Listed Building of Lloyds Bank, built in 1901.	1522 0108	
Y	1089982	Grade II Listed Building of Mill House, built in the early- to mid-17th century.	1501 0130	
Z	1305211	Grade II Listed Building of Moor Farmhouse, built in the early- to mid-18th century.	1580 0082	
OTHER ELEMENTS OF THE HISTORIC ENVIRONMENT				
1	1003419 280	Scheduled Monument of an Anglo-Saxon cemetery.	1456 0144	
2	20521	Area of Anglo-Saxon occupation, revealed by excavations at and to the south of Coln House school in 1999.	1494 0084	
3	48085 45956	Area of Anglo-Saxon occupation, revealed by excavations on the west side of Horcott Road in 2013, 2015 and 2016.	1483 0062	
4	20580	Primary core of medieval settlement around St Mary's Church [P], with possible site of the medieval manor house.	1518 0112	
5	No ref.	Subsidiary core of medieval settlement around the crossroads, known as Milton End.	1478 0090	
6	3358	Milton Street has its origins in a turnpike road of 1727, which connected Cirencester to St John's Bridge in Lechlade.	See Fig. 2	
7	No ref.	Row of cottages along the west side of Horcott Road to the south of the Site, which appear to be of 18th century date.	1484 0081	
8	No ref.	building now known as Applestone Court, which was built at the same time as Coln House to comprise part of Alexander Ile's private asylum 'The Retreat'.	1478 0087	

APPENDIX 4: HISTORIC BUILDING RECORDING SURVEY REPORT



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