



Planning, Design & Access Statement

Proposal: Repairs to Grade II Listed Barn (retrospective)
Site: Shrub Farm Barn, Shrub Farm, Castle Combe, SN14 7JA
Our Reference: 2517_Planning Statement

Land Development and Planning Consultants Ltd. is a Rural Planning Practice based in Corsham, Wiltshire. The Practice was established in 1989 to provide advice and representation on the range of town and country planning issues relating primarily to the countryside, villages and the market towns of Wessex. Clients include individuals, developers, legal and land agencies, commercial and residential developers, local authorities and amenity groups.

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Appendix 1; Context plan

Appendix 2; 'Repairs to Barn at Shrub Farm, Castle Combe SN14 7JA' prepared by Mr R. Munnings

Appendix 3; Letter to Enforcement Officer from Mr R. Munnings, 5th February 2025.

Appendix 4; Official List Entry for Barn at Shrub Farm

Appendix 5; Aerial images

1.0 Introduction

- 1.1 Land Development and Planning Consultants Ltd. have been instructed by Mr Roger Munnings, the freehold owner of Shrub House and Shrub Farm, Castle Combe to prepare and present a retrospective application for Listed Building Consent for works that have been undertaken for the repair of a Grade II Listed Barn ('Shrub Farm Barn'), first listed in December 1960.
- 1.2 Mr Munnings purchased Shrub House and some 11 acres in 2004, the barn (subject of this application) and farm yard plus an additional 6 acres in 2009, and an additional 200 acres of land and woodland in late 2021. The holding is shown outlined in red in the aerial image (Appendix 1)
- 1.3 Together with his family, he has occupied the property as his home since 2009, letting the associated land for grazing. However, until the beginning of 2022 much of the Applicant's time was spent away from the family home with work. In 2022 Mr Munnings retired from his Board of Directors responsibilities and commenced a more active role in the management of the farmland. It is the Applicant's intention to gradually take the farm back in hand, restoring the quality of the land and woodland, raising his own livestock, through production of hay and silage.
- 1.4 Mr Munnings was contacted by an Enforcement Officer from Wiltshire Council investigating works to the barn early in 2025. For the consequent meeting Mr Munnings prepared a paper detailing the works that had been undertaken and the material used. The document is reproduced as Appendix 2 of this statement.
- 1.5 Following the Officer's site visit on 29th January 2025 further queries were raised and answered by letter dated 5th February 2025, which is reproduced as Appendix 3 of this statement.
- 1.6 The application is supported by the following plans and documents;
 - 1.6.1 FP01 – Barn ground floor plan
 - 1.6.2 FP02 – Barn first floor plan
 - 1.6.3 EL01 – Barn elevations

- 1.7 This paper uses the Design & Access framework to assess the development and draws conclusions in the final Planning Assessment section.

2.0 Policy Context

- 2.1 The starting point for the determination of this application is the provisions of the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states determination must be made in accordance with the Plan unless material consideration indicates otherwise. The relevant Development Plan for this form and scale of proposal comprises Wiltshire Core Strategy 2015 (WCS).
- 2.2 The most relevant policy of the WCS is Core Policy 58; 'Ensuring conservation of the historic environment'. The policy confirms that *'development should protect, conserve and where possible enhance the historic environment'. Designated heritage assets and settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including, (iii) buildings and structures of special or historic significance'*.
- 2.3 The policy wording also confirms *'Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications'*.
- 2.4 The National Planning Policy Framework and Planning Practice Guidance are material considerations to the assessment to all forms of development and plan-making.

3.0 Design & Access Statement

Features and context of the existing site

- 3.1 Shrub Farm Barn is a Grade II Listed building within the curtilage of Shrub House, and the wider farm estate of some 220 acres. The official list entry is produced as Appendix 4 of this statement, referring to a late 18th to early 19th century rubble stone barn, part stone tiled, part pantiled roof. Although the listing refers to '12 bays', the barn is effectively, two grain barns, each with three bays either side of opposing hipped porch projections incorporating cart openings on east and west elevations, separated by a full height central wall. The northernmost bays had been converted into a squash court by a previous owner but was largely dismantled by the time Mr Munnings acquired the building. A lower, two storey range projects from the northern gable with independent access at the ground level, and external steps to a loft.
- 3.2 As noted in Pevsner' Wiltshire (2nd Edition 1975), '*SHRUB HOUSE*,' *'the house has an unusually long barn with two porches, unfortunately largely pantiled'*.
- 3.3 The barn forms the western side of an enclosed yard with Shrub House to the east, and a stable range to the south abutting the barn. To the north of side of the yard is Shrub Cottage, an annex to Shrub House, formed by conversion of a former byre (planning reference 00/00119/FUL & 00/00120/LBC).
- 3.4 The application site lies within the Cotswold National Landscape and the west of, but outside, the Castle Combe Conservation Area, the western boundary of which is contiguous with Beckers Wood, east of the Shrub House and Farm complex.
- 3.5 Glimpsed views of the barn are available from the south west on the lane leading to West Kington, and during the winter months from PROW CCOM10 to the east of Shrub House that runs through Beckers Wood.
- 3.6 Access**
- 3.7 The subject building is on private land and in an agricultural use. The repairs for which retrospective consent is sought do not propose any change to the use or access to the building and therefore further comment regarding access is not necessary.

3.8 Layout

- 3.9 The repairs for which retrospective consent are sought do not include any change to the layout of the subject building or its environs and therefore further comment in relation to layout is not necessary.

3.10 Scale and appearance

- 3.11 The repairs for which retrospective listed building consent are sought do not include any change to the scale of Shrub Farm Barn. However, the replacement of the pre-existing pantiles with Double Roman tiles over the entirety of the roof as part of the repair process is a material consideration to the acceptability of the works to the building, as is the insertion of a breather membrane under the new tiles and the addition of strengthening, structural elements to the trusses.

Replacement tiles

- 3.12 Aerial images, produced in Appendix 5 show that around 2013 the main barn was roofed solely tiled with a terracotta tile, rather than the mix of stone and pantile described in the listing, with a significant area of corrugated metal sheeting on (visible) the western roof slope. In fact, when Mr Munnings took ownership of the barn in 2009, and until the repair work in 2023-2025, the barn roof comprised around 60% Double Roman tiles, including as the predominant covering to the four, hipped porches, together with the corrugated sheeting and the balance being made up by pantiles, as stated in documents in Appendix 2 and 3 of this statement.
- 3.13 Lean-to projections are also apparent to the east and west elevations, under a sheet roofing. At 2014 instances of deterioration of the main roof become apparent on both east and west roof plains, and the hip to the northwest projection appears to be open. The deterioration becomes more pronounced in successive years, during which time tiles were falling from the roof into the yard (rather than landing on the lean-to which were removed before 2017).
- 3.14 The loss of the pantiles from the roof was partly a function of the decay to the pins attaching them to the battens, but also the a result of the decay to the battens caused by the openings in the roof, the open nature of the pantiles (which do not fully

interlock) allows for ingress of water blown between the tiles, (particularly on the southwest corners of the elevated and exposed site), and a poorly laid non-breathable membrane that held water against the battens.

- 3.15 Needing to remedy the situation, and to arrest the deterioration of the remainder of the roof and its structure, Mr Munnings instructed that focused repair work was undertaken to patch the holes. However, as work by his appointed experienced heritage roofer progressed, it became clear that simply closing up the holes would not address the core problem of the leaking pantiles, as wider issues with the roof structure were identified caused by time and ingress of the elements.
- 3.16 Work had commenced in September 2023 at the southern end of the barn with the aim of patching the holes in the roof. More and more tiles were removed revealing, more and more failing woodwork, thus it gradually became apparent that a more comprehensive repair was required. The remainder of the roof of the southern half of the barn was stripped and as the contractor moved towards the central wall it also become apparent that while the northern half of the barn had appeared sound, a non-breathable membranes laid either side of the battens had filled with water and caused the battens to rot, with consequential effect on the rafters and trusses.
- 3.17 The repair work then extended to secure the roof structure; failing rafters and some elements of the trusses were replaced. The rafters were lined with an appropriate breather membrane over which new battens were fitted before re-tiling.
- 3.18 Where required, repairs to the wall plate were made to provide a secure footing to the rafters, and while the weight was removed from the roof the opportunity was taken, on the advice of a Structural Engineer, to brace the trusses at their footing onto the wall plate with metal plates and at the ridge with marine plywood. Where necessary stone work was also repaired. The scope of works undertaken is set out in Appendix 2 'Eventual Total Work Carried Out to Date'.
- 3.19 As works to arrest decay and secure the roof structure progressed, options for replacement tiling were considered by Mr Munnings in consultation with his contractor and engineer, as discussed at Appendix 3 'Composition of tiles now in situ'.

The Applicant's decision was to re-use as many of the salvaged Double Roman Tiles from the roof as possible, rather than smaller number of useable, salvaged pantiles. The salvaged tiles were supplemented with reclaimed terracotta Double Roman tiles to provide an interlocking roof covering, that would be better able to withstand the wind and more effectively shed water and secure the longevity of the building. Mr Munnings did consider using modern pantiles with a more effective interlocking form, but rejected the approach when samples were received, as the artificial ageing of the tiles looked inauthentic.

3.20 The works to replace the tiles and secure the structure of the roof were completed in January 2025.

3.21 Double Roman tiles are also found on Pinetum Cottage to the west of the barn and Shrub Cottage to the northeast, and as mentioned, formed the majority of the pre-existing roof covering to barn. The reclaimed Double Romans are a traditional tile that does not detract from the essential form of the barn. A significant material benefit is derived by the interlocking nature of the tile, which will provide long term security from the elements over the large roof area. The use of reclaimed tiles has ensured that the new roof finish has successfully assimilated with the surrounding buildings, as shown below where the pantiles of the stable range abut the Double Romans of the subject building.



3.22

- 3.23 In consideration of CP58, the repair of Shrub Farm Barn has been carefully considered and sensitively undertaken, by a heritage-trained builder, to provide protection to the heritage asset and will act to conserve the main fabric of the building through the prevention of water ingress that had resulted in damage to the rubble walls and the timber structure of the building. The works have preserved the building heritage asset, while respecting its character and significance, enabling it to be brought back into functional use for the farming enterprise.

Insertion of the breather membrane

- 3.24 A breather membrane has been laid over the rafters and secured under the tile battens. The depth of the membrane has had no material impact on the external appearance building and further contributes to the longevity and functionality of the structure.

Truss repair

- 3.25 On the advice of the consultant structural engineer, metal plates have been introduced to the feet of the trusses throughout the building to secure the structure of the trusses at the point of contact with the wall plate, and marine plywood boards have been added at the truss apex to secure the ridge, as shown below;



3.26

3.27 Where existing timbers to the roof had rotted or were otherwise un-sound they were replaced with Douglas Fir, where possible existing timbers were retained in situ, or salvaged for repurposing within the roof structure as purlins or shorter cross braces. Details of the approach is set out in Appendix 2 of this statement.

3.28 Landscaping

3.29 The repairs for which retrospective consent is sought do not impact upon, or require any additional landscaping of, the environs of the barn and therefore further comment in relation to landscaping is not necessary.

3.30 Impact on the heritage significance

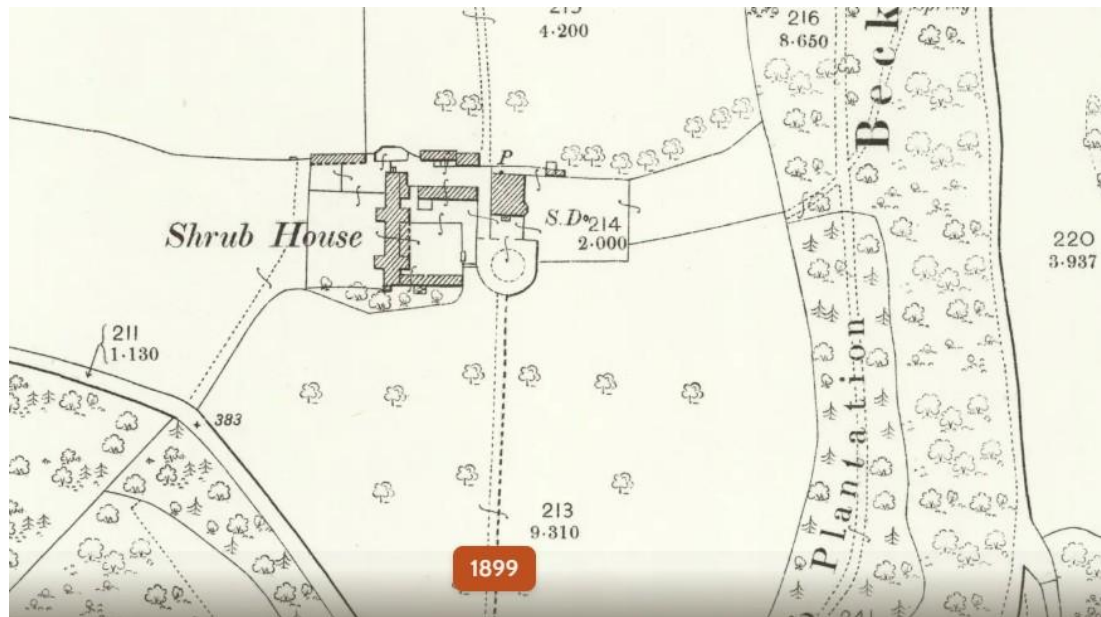
3.31 Paragraph 207 of the National Planning Policy Framework requires '*an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary*'.

- 3.32 Shrub Farm Barn stands as a principal feature of the farm complex linked to Shrub House, set within some 220 acres of grazing and woodland which still retains the field form at the time of the construction of the barn. Shrub Farm Barn also has good access to the plateau between the Bragland and the Broadmead valleys stretching to the west and sits above the Castle Combe to Long Dean section of the Bybrook Valley; an area with a number of textiles mills which were ultimately forced to close following drops in the water levels and thereby loss of power to the mills.
- 3.33 The barn would have provided an important function to the farm and the wider Castle Combe Estate for the storage of hay, straw and grain, given the scale of the building, the facility may have been use as a collection and storage facility for other farms on the Estate.
- 3.34 The Barn is first mapped on the 1885 Edition of the Ordnance Survey, and in successive editions thereafter, the three earliest extracts are shown below;

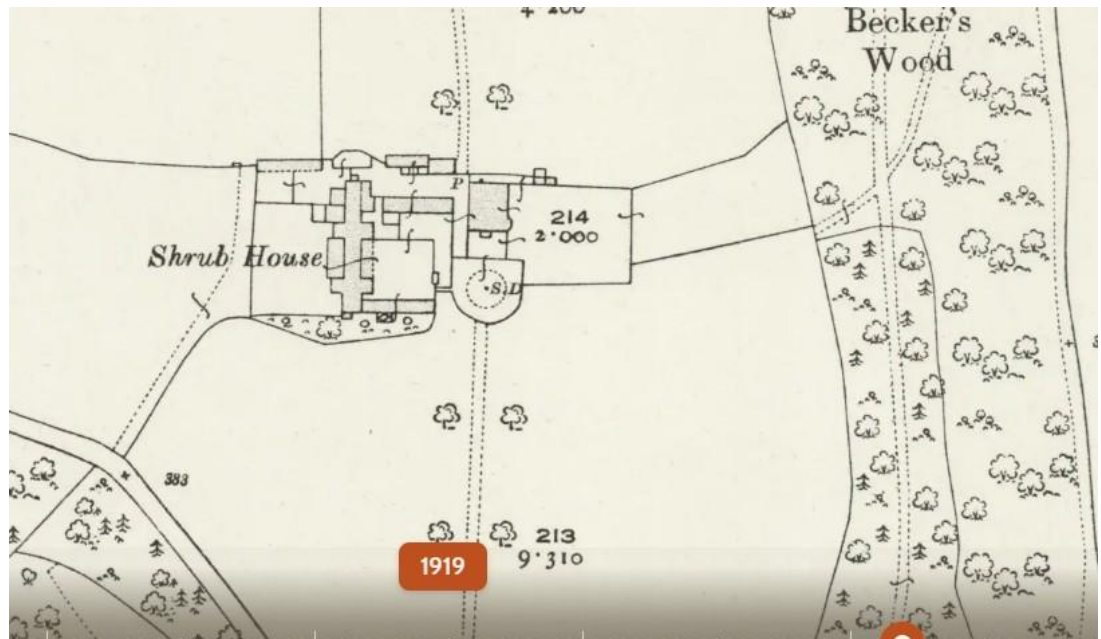
3.35



3.36



3.37



3.38 Appendix 2 notes that, what appeared to be a date stone of 1794 was found during the repair works. While this may not be determinative of the dated of the barn it may well indicate a continuous occupation of the site at Shrub House, at least since that time.

4.0 Planning Assessment

- 4.1 In the absence of the Listing, it is submitted that the works to re-roof Shrub Farm Barn would not be considered development under s55(2)(a)(ii), as the works comprise the carrying out for the maintenance, improvement or other alterations of any building which do not materially affect the external appearance of the building.
- 4.2 However, the listed status of the building means that works, including more extensive repairs, to a listed building without listed building consent is a criminal offence under Listed Buildings Act.
- 4.3 The Applicant acknowledges that, as the scope of work extended beyond simple repairs, he acted in error in not seeking the opinion of the Local Planning Authority, or appropriate professional.
- 4.4 In mitigation to this context, the aerial evidence and statements given by Mr Munnings indicates the trend of decline of the condition of the building which the Applicant took action to address, but which, as has been said, evolved significantly from patch repair to a comprehensive renovation of the building's roof. Strengthening of the roof structure is clearly legible and represents a material alteration to the building but can be easily distinguished from the original approach to construction and reads as part of the evolution of the building, employing available technologies. The approach will result in a substantial roof structure going forward. The insertion of the breather membrane will further ensure protection of the fabric of the building.
- 4.5 While at odds with the listing citation and the commentary in Pevsner, the external finish in Double Roman tiles is not out of keeping with the building's context or the material palette of the local vernacular. There is no evidence in aerial imagery of stone tiles from 1999, and no local knowledge of when the tiles were replaced. In this context the Applicant has replaced the roof covering with materials that matched the majority of the roof that he acquired in 2009, making the Double Roman tiles the logical, and sympathetic choice for the repairs.
- 4.6 In balance, the Double Roman tile provides a more secure, and weather-proof solution, and the overall character and appearance of the re-roofed barn remains as

a substantial, traditional and functional farm building well-integrated within its setting and entirely capable of serving a useful agricultural purpose well into the future.

5.0 Concluding notes and planning balance

- 5.1 In relation to CP58 and the heritage significance of the building, we contend that the unusual scale of the building is of particular importance and interest, and that essential character has been, at the very least, conserved through the works which have been undertaken, as can be seen by the images supplied with this statement. The condition, and potential lifespan of the building has been extended through works which have been undertaken with careful consideration, care and skill, albeit without the benefit of express Listed Building Consent. The material benefit to the protection and preservation of the building outweighs the limited harm to the heritage asset arising from the roofing materials and internal remedial works.
- 5.2 It is trusted that the local planning authority will be able to support the application in its submitted form. The Applicant would welcome the opportunity to discuss in detail the application during a site visit, and to provide further information as required to enable a comprehensive assessment to be undertaken. Please contact the Agent at the earliest opportunity should such details be necessary.