

2nd December 2025

ATTN: Samantha Stockley
Planning Department
Wiltshire Council
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By e-mail: developmentmanagement@wiltshire.gov.uk

Dear Samantha Stockley,

Re: PL/2025/O8695 – Permission in principle for the proposed erection of up to five dwellings

Pegasus Group have been instructed by owners of Home Farm, Sherston to review and comment on the above application. We are experienced Built Heritage Consultants, all of whom are full members of the Institute for Historic Building Conservation (IHBC), and have advised on numerous projects involving development within sensitive locations, including those in close proximity to highly designated heritage assets.

Whilst we appreciate that the local and national validation requirements do not require an application for permission in principle to include a heritage assessment (as this would be addressed in a Technical Details Consent), there is no acknowledgement in the submission whatsoever, including the Planning Statement, about the heritage constraints of the site, which are as follows:

- Grade II Listed Prater's Farmhouse;
- Grade II Listed Barn to the South West of Prater's Farmhouse;
- Grade II Listed Home Farmhouse;
- Grade II Listed Outbuildings to the North of Home Farmhouse; and
- Sherston Conservation Area.

As part of the determination of the acceptability of the site with respect to location, land use and amount of development, the effects upon the significance of designated heritage assets, including impact through changes to their settings, must be taken into account. Furthermore, we



note the Conservation/Heritage team at Wiltshire Council have not been consulted on this application, despite the proximity to the above assets.

This letter does not provide a full assessment of significance for the above assets, but it will outline the potential for impacts to significance and why heritage could be grounds for refusal of the Permission in Principle.

Grade II Listed Buildings at Prater's Farm

The application site forms part of the land associated with Prater's Farm, which comprises two Grade II Listed Buildings. Tithe records from 1839 suggest a link in ownership and occupancy between the application site and the Listed barn on the site historically, but over time, this connection extended to the Listed farmhouse as well. The site was therefore historically functionally associated with the Listed Buildings, as well as forming part of their immediate rural surrounds. Whilst intervisibility may be limited between the site and these Listed Buildings, the verdancy and tranquillity of the plot could be appreciated.

The addition of new dwellings on the site would reduce the open land surrounding the Listed farm complex, in particular land that was historically, functionally associated with the Listed barn at the time of the 1839 Tithe records and which currently and historically contributed to the gap between the farm and Sherston settlement. The associated activity on the site resulting from the proposals would also reduce the tranquillity of the site. Therefore, the proposals have the potential to result in harm to the significance of the Listed Buildings through a change in setting. The submission has not demonstrated that any configuration of layout or design at the technical details consent stage could sufficiently mitigate the harmful effects.

As part of the proposals, access to the new dwellings would be from Easton Town. At present there is a dry-stone wall which runs along the entirety of the application site boundary. Given the site's historic functional associations with Prater's Farm and its Listed Buildings, and the potential for the wall to pre-date 1st July 1948, this wall has the potential to be curtilage-Listed and thus treated as part of the Listed Building. Therefore, alterations to it could also require Listed Building Consent. If this is the case, Permission in Principle would not be applicable, and a full application for Planning Permission would be required (alongside Listed Building Consent)..

The proposals would therefore result in a degree of harm to the significance of the Grade II Listed Prater's Farmhouse and Grade II Listed Barn to the South West of Prater's Farmhouse through a change in setting. The matter relating to the potential curtilage-Listing of the dry-stone wall along the Easton Town boundary of the site could also mean that the proposals would not be appropriate for Permission in Principle.



Plate 1: Potential curtilage-Listed dry-stone wall along the Easton Town boundary of the application site.

Grade II Listed Buildings at Home Farm

Similar to Prater's Farm, Home Farm was historically surrounded by fields and had a rural position, apart from the close proximity of Prater's Farm. Access to the building was either from the east or a trackway from Easton Town. Historic mapping has depicted the trackway leading from Easton Town to the Listed complex since at least 1886. The gates to both Easton Town and Home Farm from the track are still present, meaning that this track could be utilised again at any point. In any case, it is clear that this was historically a principal approach to the Listed complex.

There is intervisibility between the Grade II Listed Home Farmhouse and the application site, as demonstrated in the images below. Whilst some of the existing views include glimpses of the roofscape of Sherston village, it is clear that this is at a distance. The erection of dwellings on the application site would further erode the gap between the Listed Buildings and the village, and the discernible rural surrounds of the Listed complex. Moreover, the introduction of the dwellings to the site would fundamentally alter the experience of the Listed Buildings on the historic trackway approach from Easton Road. Therefore, the introduction of built form to the application site would result in a degree of harm to the significance of these Listed Buildings.

As with Prater's Farm, the proposals should demonstrate the proposals have satisfied Paragraph 212 of the NPPF, which states: *"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.” Although detailed design would be secured at Technical Detail Consent stage, harm will arise through the principle of developing the plot with dwellings.



Plate 2: Views from within the Grade II Listed Home Farmhouse looking towards the site (indicated in red).



Plate 3: View from the grounds of Home Farm into the application site.



Plate 4: The access track entering Home Farm from the field to the west (the application site beyond the vegetation to the left).



Plate 5: View from the historic track towards Home Farm with the application site indicated in red.

Sherston Conservation Area

The Sherston Conservation Area was designed in 1973. A Statement was prepared and adopted by North Wiltshire District Council in 1999. The application site does not fall within the boundaries of the Conservation Area, but there is intervisibility between the site and the northern boundary of the Conservation Area.

The Statement describes views from the northern boundary, stating:

“Grouped cottages on fringes of village settlement, linearly developed along road. Houses reach the Sherston/Tetbury cross-roads on the north side of Easton Town, but stop short of Praters Farm on the south side, allowing views to open countryside to the south and east.”

As a result of later expansion of the village beyond the Conservation Area boundary, the Statement states:

“Sherston is fortunate in that expansion has not compromised the historic core of the village around the High Street/Cliff Road. Recent developments such as Manor Close, beyond Green Lane, and The Tartars and, Easton Square, to the east of Noble Street are cul-de-sac arrangements. Although fundamentally unrelated to the village pattern, they at least do not impinge on it. Care will need to be taken with regard to further expansion, to avoid compromising the open space that is important to the context of the village.” (our emphasis)

Within the view out of the Conservation Area to the north (towards the site), dry stone walls can be seen along Easton Town. The Conservation Area Statement discusses the importance of such walls within the boundary, and views outside of the Conservation Area would similarly contribute positively to the significance of the Conservation Area through setting. It states:

“Within the Conservation Area, the stone and dry-stone boundary and retaining walls play a large part in defining the character of Sherston. There are many fine examples, defining ancient burgage distribution of land and terracing the gradients down to the river crossings to allow level plots. They also form an important setting for the buildings of the village. Their construction shows particularly fine grade materials and workmanship generally with cappings.”

The proposed development would be appreciable from the Conservation Area boundary, changing the rural character of the view and removing undeveloped land which forms part of the appreciable rural surrounds of the historic settlement. Furthermore, the alterations to the dry-stone wall to incorporate the new access would also remove a positively-contributing feature from this view. The proposals would thus have the potential to harm the significance of the Conservation Area through a change in setting.



Plate 6: View from within the Conservation Area towards the site (indicated in red, the plot beyond the trees).

Summary

Whilst the above has not provided a full assessment of potential heritage impacts, it has set out the potential for the proposed development to result in harm to the significance of the identified heritage assets.

Core Policy 57 Ensuring high quality design and place shaping of the Wiltshire Core Strategy 2015 states:

"A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced

- ii. retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)
- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
- ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future
- xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
- xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place
- xiv. meeting the requirements of Core Policy 61 (Transport and New Development)."

Again, whilst many details of the development could be secured by the Technical Detail Consent, the submission has not demonstrated that heritage would not be an overriding constraint to the residential development of the site and would be *“sympathetic to and conserving historic buildings and historic landscapes”* by virtue of the innate harm that would be caused by developing historically open land that was functionally associated with Listed farm buildings and which continues to give legibility to the separation between the historic farm complexes and the village of Sherston.

Core Policy 58 Ensuring the conservation of the historic environment states:

“Development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. nationally significant archaeological remains*
- ii. World Heritage Sites within and adjacent to Wiltshire*
- iii. buildings and structures of special architectural or historic interest*
- iv. the special character or appearance of conservation areas*
- v. historic parks and gardens*
- vi. important landscapes, including registered battlefields and townscapes.*

Distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

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.”

The submission similarly has not satisfactorily addressed this policy, and has, in fact, completely omitted mention of the above policies, despite the close proximity to heritage assets. The submitted Planning Statement makes a point of summarising that *“Section 70[2] of the Town and Country Planning Act 1990 and section 38 [6] of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise,”* but it has not given a reason for why these policies have been left out entirely when Permission in Principle considers location, land use and amount of development, all of which are directly linked to the wording of the policies.



Overall, the proposals will inevitably alter the character and appearance application site by virtue of the change of land use and the amount of development proposed, and heritage harm to the designated heritage assets would arise as a result. Moreover, further investigation should be undertaken by the applicant to determine whether the wall is, in fact, curtilage-Listed, as the submission would then require Listed Building Consent and Permission in Principle would not be applicable.

Given the above, we would object to the proposals, and particularly given the uncertainty regarding the status of the boundary wall, Permission in Principle should not be granted.

Kind regards,

Claire Gayle B.EnvD, MSc, MA, IHBC
Director – Heritage