

Wiltshire Council Planning Consultation Response

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Application No: PL/2025/09825
Outline planning application (with all matters reserved except means of access from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of a new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.
Land at Gate Farm, High Street, Sutton Benger

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☐	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☒	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 requires that **special regard** be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-216 of the NPPF require a balanced approach with any harm which would be caused being

weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires that "designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "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 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."

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Site and assets considered: The affects the setting of Gate House Farm, No.5 High Street which are Grade II listed building and the setting of Sutton Benger Conservation Area.

Proposal: The proposal seeks outline planning permission (with all matters reserved except means of access from the B4069) for up to 90 no. (class C3) residential dwellings (including 40% affordable dwellings) including the creation of a new vehicular access (from the B4069), pedestrian and cycle paths, parking spaces, public open space, biodiversity enhancement, landscape planting, surface water attenuation, associated infrastructure and other associated works.

Relevant planning history: ENQ/2025/01561 - Outline Application for up to 90 no. (Class C3) residential dwellings, with all matters reserved apart from access

Issues: impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, the application is accompanied by a "Heritage Statement" which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: The NPPF defines significance as the "value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic or historic**. Significance derives not only from a

heritage asset's physical presence, but also from its setting." Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the significance of the heritage assets in the study area is derived primarily from their architectural, historic, archaeological, and in some cases communal values, as well as the contribution made by their settings. The wider rural setting also contributes to the origins of the settlement and the character and appearance of the conservation area.

Assessment: The site lies to the west of the village and is an important gateway to the settlement. The site sits affects the setting of Gate House Farm, No.5 High Street which are Grade II listed building and is immediately to the west of the boundary of Sutton Benger Conservation Area.

The land is broadly square in shape and comprises a grassed field. The field is currently used for livestock grazing, and there are no existing buildings on the site and it forms the interface of the village with the countryside.

My comments are based on the illustrative site master plan that forms part of this application.

The site lies to the west of the Sutton Benger Conservation Area. New development proposals should pay special attention to preserving and enhancing the character or appearance of the conservation area. In addition, No.5 High Street and Gate House Farm are located opposite the south east corner of the site.

The site layout would not respect the historic linear form of the conservation area and shows a typical suburban layout of a standard housing developer. The proposed house types all appear boxy units with little variation whereas the conservation area is more reflective of small scale cottages, farmhouses, agricultural barns, with a mix of plots and setback in the plots. The layout and house types would not be representative of their historic context and would represent an 'anywhere development'.

This suburban housing estate proposal would not create an attractive gateway, would not be representative of the historic pattern and mix of development in the conservation area and would be an erosion of the wider rural setting of the heritage assets.

This level of harm would be a moderate adverse change that would be a negative element within the setting that would erode the significance of the historic assets to a clearly discernible extent.

Summary & conclusion: The NPPF confirms 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). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The proposals will result in harm to the setting of two listed buildings and Sutton Benger Conservation Area via suburban development in their settings. The proposals involve only part of the setting of the heritage assets and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF. However the wording of the NPPF and the 'special regard' by Section 66 and 'special attention' by Section 72 of the Act requires that any level harm caused should be taken seriously.

As a result, the proposal fails to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.