

Wiltshire Council Planning Consultation Response

Application No: PL/2025/09841
Address: Church Farm, Bath Road, Shaw
Case Officer: Peter Crozier

Please find following comments in respect of the above consultation:

Recommendations:

☐	No Comment
☐	Comment
☐	Support
☐	Support subject to conditions (please set out below)
☐	Object (for reasons set out below)
☒	No objections

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

National Policy and Guidance:

Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 – requirement to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The National Planning Policy Framework (December 2024 (as amended February 2025)) outlines government policy, including the historic environment (Section 16). Paragraph 210 requires local planning authorities to 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. Paragraphs 214 – 216 require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. National Planning Policy Guidance provides guidance on making changes to Heritage Assets.

Historic England's *Advice Note 2 – Making Changes to Heritage Assets* (2016) is also relevant guidance for applying the policies within the NPPF.

Historic England's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment". Additional guidance is also contained within their publications:

- *Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment*
- *Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)*

Local Policy:

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': 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.

Wiltshire 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."

Site:

Church Farm consists of a range of single and double-height barn-type buildings, some of which are historic, others modern or rebuilt barns, currently being used as a mix of small business units. Adjacent to the site is grade II listed Church Farm House: this is separated from the barns by a tall, historic, stone boundary wall.

Proposal:

Proposed Change of Use to Create 6 Dwellings.

Issues:

Impact upon the preservation of the listed building or its setting or any features of special architectural and/or historic interest.

Assessment:

The proposal is to convert the existing buildings from business use, to residential.

The existing range of buildings is a mix of historic buildings that have been converted, rebuilt buildings and new development. Whilst the buildings are historically linked to the neighbouring Church Farm House, being the historic farmyard, there is no listed building consent application history for the site, which suggests they were separated in ownership prior to the farm house being added to the statutory list in 1985. Therefore they are not considered curtilage listed buildings, but have the potential to be heritage assets, due to their historic association with the farmhouse.

The proposals are for the change of use to the buildings to residential, but not external changes are proposed. Therefore there is no visual impact on the character of the buildings as the status quo is retained.

The only change proposed is the subdivision of the site to provide patios, lawns and hedging, which is of no concern.

With the change to residential comes the pressure to provide fences and external storage (sheds etc) – the accumulation of such items can have a visual impact on the site, becoming divided by hard boundary treatments and sporadic siting of outbuildings. These have the potential to have a negative cumulative impact on the setting of this historic farmyard, by changing the character to something overtly residential, more in line with a small estate-type development, which would not preserve the setting. Therefore removing permitted development rights from the dwellings would allow for an element of future control over the cumulative impact of such elements, to reduce harmful impact on the setting of these former farm buildings.

Pippa Card
Senior Conservation Officer
Wiltshire Council Planning

Date: 14/01/2025

National Policy and guidance: 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. Sections 16 (LBC) and 66 (PP) require 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.

Paragraph 58B of the Planning Act 1990 require that in considering whether to grant planning permission or permission in principle for the development of land in England which affects a registered park and garden, the LPA must have special regard to the desirability of preserving or enhancing the asset or its setting.

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 214-16 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.

Chapter 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework."

National Planning Practice Guidance provides guidance on interpreting the NPPF. 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.

Historic England's "Conservation Principles" provides policy and guidance for the "sustainable management of the historic environment". Additional guidance is also contained within their publications:

- **Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)**
- **Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)**

The following points are taken from the Historic England document "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

"The NPPF makes it clear that the setting of a heritage asset is 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."

“The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part...”

“While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time.”

“The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

Other HE publications

[Traditional Windows: their care, repair and upgrading](#)

HE GPAs and HEANs [The Planning System | Historic England](#)

Local Policy: 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 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.” It is also required that 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.

Wiltshire Council’s Core Strategy Policy CP57 ‘Ensuring high quality design and place shaping’: 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.

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.”

Proposal:

Relevant planning history:

Issues: impact on the listed building, 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, whilst the applications are accompanied by a "Design, Access and Heritage Statement" the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

In this case, the applications are accompanied by a "Design and 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 (as appropriate): 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 building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area. etc

The rear of the building has, however, been compromised by extension and alteration during the modern period and is of lesser interest.

The interior retains a good set of historic joinery

The circulation pattern remains largely unaltered

Assessment: of proposals including their impact on the special interest of the building/conservation area and any harm which will occur via loss of historic fabric, scale, bulk (etc as appropriate). Also any benefits.

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 building via the loss of historic fabric and character and via change to its layout and original external form. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of important structural historic fabric and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and the proposals are articulated as being primarily for the convenience of the occupants i.e. a private benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.

In this case the proposals will also result in considerable heritage benefits by virtue of the proposed investment in repair and upgrading/structural repair which will help to secure the future/stability of the building /via facilitating the optimum viable use.

The impact of the proposals on heritage assets will be neutral On this basis no specific justification is required however it is considered the works will assist in securing the future use of a heritage asset in support of its long-term conservation. The requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.

The impact of the proposals on heritage assets will be largely positive and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the applications.