

Wiltshire Council Planning Consultation Response

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Fiona Webb
Senior Conservation Officer (Consultant)
Wiltshire Council Conservation (Central)

Officer's Name: Helena Carney
Officer's Title: Planning Officer

Application No: PL/2025/08855
Erection of 1no. dwelling, garaging, provision of church car parking, access, landscaping and associated works.
Land adjacent to Truant House, Church Lane, Froxfield, Marlborough, SN8 3JY

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."

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.

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 site comprises a parcel of greenfield land. The north of the site is bound by Church Lane and to the east is Truant House and its garden. To the south is the Froxfield Stream and Bath Road (A4) and to the west is All Saints Church and agricultural land.

The site is located within the Froxfield Conservation Area and within the setting of listed All Saints Church. Truant House is listed as a locally important 'unlisted' building and as such is a Non Designated Heritage Asset. These are the main conservation impacts of consideration.

Proposal: The proposal seeks the erection of 1no. dwelling, garaging, provision of church car parking, access, landscaping and associated works.

Relevant planning history: ENQ/2024/01162 - Construction of 1no. residential dwelling and associated works.

Issues: impact on the setting of neighbouring listed buildings and NDHA, 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 applications are accompanied by a "Planning, Design and Access 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 site lies on the edge of the village with its rural hinterland beyond. In particular importance is the setting of the church and churchyard.

Assessment: This is my second response and follows on from the submission of amended plans. The site affects the setting of the Church of All Saints which is a Grade II* listed building and Froxfield Conservation Area.

The proposal is for a four-bedroom dwelling of a contemporary agricultural barn form, together with a double garage, associated access, and landscaped garden.

The site enjoys a largely rural setting, part of which encompasses views down towards the south and south east towards a stream.

The proposal has been amended slightly by the omission of the box dormer. However it is larger than that shown at preapp with a tall pitched roof, with the addition of a double garage stepping forward of the existing hedgerow. Whereas at preapp the design concept was a simple, subservient single storey dwelling with a low mono pitched roof with the building barely visible from view and largely hidden behind the existing laurel hedge. The drawings also indicated a green roof which was also encouraged.

I again reiterate that the proposed one and a half storey height is considered a retrograde design and one that would not be supported due to the height of the building, and the building form stepping closer to the church.

Regarding comments from the applicant regarding the precedent material submitted at that preapp stage, I did provide comments as to what form of building may be supported subject to detailed design. This was not a one and a half storey building with a pitched roof form and standing seam roof.

This would intrude into the setting of the heritage assets and would have an increased visual presence, eroding the rural character and setting. Rather than the preapp proposal which was an understated low lying structure with a single storey mono roof form which was subservient and largely hidden from view.

Overall, the design concept of a large pitched roofed barn with development stepping forward on the site is considered unsympathetic to the local context and setting.

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 rural character and the setting of the heritage assets due to the built form intruding into this setting, with both the house, garage and areas of paving, parked cars, fences eroding the rural character of the church and churchyard. The proposals involve only part of the area and 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 of the Act requires that any level harm caused should be taken seriously.