

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/00245
**Replacement front boundary wall, and new gravel driveway.
Manor Farm, 17 The Street, Chirton, Devizes, SN10 3QS**

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

Recommendations:

☐	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 16 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." 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.

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: Manor Farmhouse is a Grade II listed building, an associated barn enclosing the west side of the courtyard is a Grade II listed building, and associated stables and barn enclosing the north side of the courtyard is also a Grade II listed building. Other structures within the farmstead grouping are considered curtilage listed, such as the front brick boundary wall and associated walling in the courtyard and the single storey shelter shed associated with the front boundary wall. The farmstead is located within Chirton Conservation Area.

Proposal: The proposal seeks listed building consent for the replacement front boundary wall.

Relevant planning history: PL/2025/09035 - Replacement front boundary wall, and new gravel driveway – under consideration; ENQ/2024/01285 - Erection of 4no. detached dwellings, conversion of existing barn into single dwelling, sub-division and extension of Owls Barn (Grade II Listed Building) to create 2no. separate dwellings, with associated parking, turning, landscaping, private amenity space and access arrangements. Modification of existing buildings to form garaging. Removal of existing buildings/structures and diversion of existing public footpath; PL/2024/05971 - Erection of detached cart shed, following removal (under consideration); 16/08431/LBC - Repairs and restoration of existing Listed Barn (approved); 14/10460/LBC and 14/10413/FUL - Alterations and refurbishment of existing farmhouse and detached garage. (approved); PL/2024/03109 and PL/2024/03109 - Demolition of existing single storey extension to south elevation. Erection of two-storey extension to west elevation (approved); K/31933/L - Alterations and provision of roof lights to form room in in roof space. (refused); K/15593/L - INTERNAL AND EXTERNAL ALTERATIONS TO CONVERT EXISTING STABLE TO DWELLING (approved); E/09/0572/FUL - Demolition of rear single storey extension and construction of rear two storey extension. (approved); K/14034 - CONVERSION OF FARM BUILDINGS TO HOUSE WITH ATTACHED WORKSHOP FOR LIGHT INDUSTRIAL USE. (approved); E/09/1169/CAC - Demolition of coal shed and open fronted shed, retention of back wall. (approved); PL/2022/06448 and PL/2022/06860 - Conversion of part of Owls Barn to provide additional residential accommodation to be used in conjunction with the main house; associated works including replacement windows to existing barn and replacement means of enclosure (approved); K/31933/L - Alterations and provision of roof lights to form room in in roof space. (appeal dismissed).

Issues: impact on the significance of the listed building, impact on the setting of neighbouring listed buildings, impact on the character and appearance of the conservation area.

Information considered/provided: Paragraph 207 of the NPPF 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 not accompanied by a “Heritage Statement” in order to provide sufficient information to understand the impact of the proposals. As such, as a result, it fails to meet the requirements of the NPPF.

However, paragraph 208 of the NPPF 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 wall proposed for replacement lies largely with its historic fabric and sense of enclosure and use of local materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area and setting of the historic farmstead grouping.

Assessment: Manor Farmhouse is a Grade II listed building and forms a farmstead grouping with its Grade II listed barn and Grade II listed cow sheds and stables. The cow shed and stables have been converted to residential use. The boundary wall of the site is a curtilage listed structure and runs along the majority of the front site boundary enclosing the site from the road. The wall also has lower sections which form a retaining plinth to the garden area of the property adjacent to the main street and define a footpath linking the rear of the farmhouse to the street.

The proposal seeks the replacement of the front boundary wall, and the provision of a new gravel driveway to the front side elevation of the property. These works are retrospective.

The justification given for the rebuilding of the wall is that the original wall partially collapsed at the time of removing trees from the side garden of the property. This justification is totally misleading since an alternative solution would have been to have chopped the trees down to the ground and applied a chemical plug to the base of the tree which would have killed the tree and the roots without causing any harm to the curtilage listed wall. Additionally, even if the applicant had not wished to have used this non-invasive method of tree removal, any damage caused to the boundary wall could have been repaired using salvaged materials on a like for like basis.

These unauthorised works were carried out in the full knowledge that the boundary wall was a curtilage listed structure and the applicant and their team having had ample time to have discussed these works with the LPA, since as Conservation Officer I attended site on a number of occasions in the months before the works were carried out for various applications at the property. If this had been discussed on site or a pre-application submitted, this would have resulted in a far more sympathetic boundary wall treatment and the formal garden setting to the listed building being retained.

Despite being previously requested a number of months ago in comments on the sister planning application for these works, no elevation has been submitted showing the original design and layout of the wall, garden entrance path and drive opening. However the form and appearance is clearly visible on Google Streetview in 2023.

In conservation terms, the proposed boundary wall is considered an unsympathetic replacement for a number of conservation reasons:

- The wall is not a like for like replacement of the previous boundary wall – change in height, coping treatment, creation of a widened access at the garage end, introduction of gateway piers, removal of the pedestrian path to the rear of the farmhouse and the street, removal of the small retaining wall to the garden area facing the road.
- Entrance piers to the driveway – the original entrance to the farmhouse had no gate piers. The proposed scheme introduces a pier either side which creates a grandiose entrance to the farmhouse. The copings to the proposed piers are out of keeping with that of the proposed wall.
- Poorly ill-defined enclosure of the boundary to the site leaving a gap adjacent to the existing garage, whereas historically the site was historically enclosed along the boundary to the street.

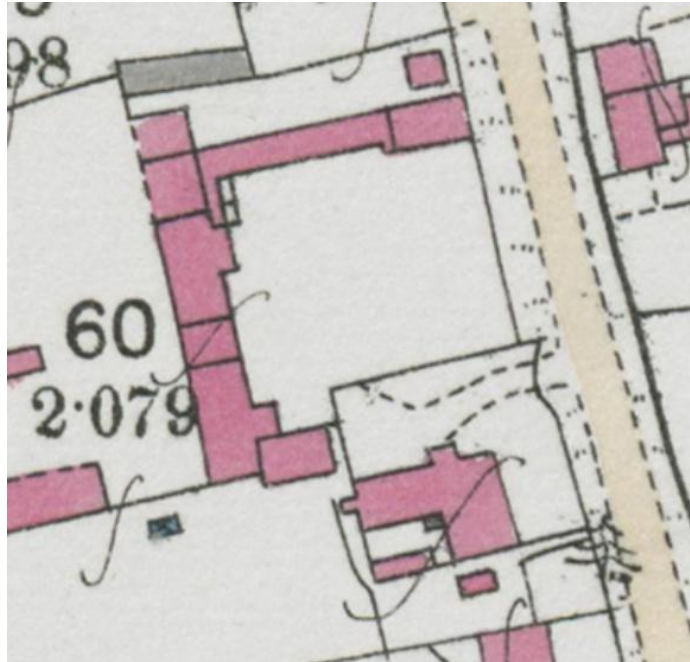


Streetview 2025



Streetview 2023

- Removal of the historic pedestrian entrance and brick piers in the boundary wall at the rear of the farmhouse - This pre-dated the First Edition OS Map (c.1880) shown in the map below; this was a feature of the boundary wall and the original layout/function the site and farmstead grouping. Associated with the removal of the pedestrian entrance was also the removal of the raised brick plinth to the former garden area which defined the pathway. The plinth walls and garden area has now been removed and replaced with driveway.



First Edition OS Map (1880's) showing continuous enclosure and pedestrian path

- Provision of an inappropriate brick soldier course coping, whereas historically this would have most likely have been topped by either stone or a brick coping (such as a half round or saddle back coping)
- Sharp step down in height in the wall whereas this was previously gently sweeping.



Streetview 2025



Streetview 2023

In regard to the proposed creation of a new driveway and parking area to the east of the farm house at the rear of the boundary wall, this is also considered harmful to the setting of the farm house and the character and appearance of the conservation area. The front/side garden makes a positive contribution to the heritage assets and the pedestrian footpath between the street and the rear of the house is a historic element of the layout of the site. The footpath is bordered by a low brick retaining wall to the garden area which is attached to the side wall of the farmhouse and the front boundary wall of the site and is curtilage listed, see image of the street scene below:



The proposed driveway would create a new entrance opening at the south east corner of the boundary wall which would largely destroy the sense of enclosure to the farmhouse. The proposed hardstanding would also destroy the garden setting to the farmhouse which would be cluttered by parked vehicles which would be prominent in the street scene and detract from the significance of the heritage assets; as shown in street scene below:



Streetview 2025



Streetview 2023

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 proposal will result in harm to the curtilage listed boundary walls via the loss of historic fabric, via change to layout and inappropriate changes to the original external form of the structure and the setting of the listed building. The proposals involve only part of the listed structure and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but it involves loss of historic fabric, changes to the enclosure of the farmstead grouping and changes to the historic garden setting of the listed farmhouse and as such 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.

In addition, the proposal will result in harm to the character and appearance of the conservation area via inappropriate changes to the original boundary wall of the listed building, the garden setting of the listed farmhouse and historic farmstead grouping. The proposals involve only part of the conservation area and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve inappropriate alterations to the curtilage listed walls and the garden setting of the farmhouse that are historic farmstead features which makes a positive contribution to this designated heritage asset and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special attention' by Section 72 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 208 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective clear justification has been provided for the

works and the proposal is articulated as being primarily for the convenience of the owners of the farmstead 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.