

Wiltshire Council Planning Consultation Response

14th May 2026

Janice Gooch
Senior Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Lucy Rutter-Dowd
Officer's Title: Senior Planning Officer

Application No: PL/2026/02501
Proposed self-build dwelling
Green Farm, The Green, Urchfont, Devizes, SN10 4RB

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.

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. Section 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.

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.

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."

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." 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.

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: The proposed scheme looks to construct a new one and half storey, 4-bedroom dwelling (self-build) to the north of Green Farm.

Relevant planning history: N/A

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.

The applications are accompanied by a “Heritage Impact Assessment and Design & Access Statement” provides references to the Listing Descriptions for Green Farm and outbuilding at Green Farm, Pynsent Cottage and West End House (all GII listed) and then explores the historic OS for the proposed site, to enable an assessment of significance and impact assessment. The requirements of the NPPF are therefore met in this respect. The Statement states that there is no harm to the designated heritage assets, but if harm was found, the scheme offers a public benefit of an additional dwelling in a sustainable location.

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.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

Historic OS Maps

The historic tithe Map (c.1840) shows the farmhouse, with the proposed site being a separate plot to the north. Development within the vicinity is limited, with no development to the north of the farmhouse, and Pynsent Cottage being the only dwelling to the west until Cuckoo’s Corner. Green Farmhouse has a single outbuilding to the east.

Small development within the village within the mid-1800s with additional dwellings heading north-west towards Cuckoo’s Corner and east towards Manor Farm. The agricultural buildings at Green Farm start to be developed, with additional boundaries inserted to separate the domestic space and agricultural/ orchard space. Further boundary changes occur throughout the 1800s with the proposed site separated again from the domestic space/ curtilage. By the early 20th century, the domestic/ orchard boundary line is reduced to allow for a larger orchard, but there is still connection between these spaces.

Further development in the late 20th century includes infilling between The Green and Cuckoo’s Corner and up to Knights Leaze Farm further north. The orchard to the north of Green Farmhouse is lost with the development of Oakfrith House (c.2009) and Laurel House. It is this development that creates the new entrance between The Stables and West End House to provide access to Laurel House and Oakfrith House.

Conservation Area

The boundary of the Urchfont Conservation Area includes the new development to the west and north, apart from Pathway House and Walnut House which sit directly north of the proposed site and historically formed part of the wider curtilage (orchard) of Green Farm.

The conservation area is based on the core of the village, which was partly relocated under the landscaping works at Urchfont Manor (1841). The conservation area is formed of the High Street with its village pond, the area around the Green (including Cuckoo’s Corner) and Urchfont Manor (GII*). The character responds to a rural settlement that had great wealth in the C14-C17 which allowed for the development of a number of larger houses and the later impact of the relocation of part of the village to allow for the manor house landscaping works.

The Green Farmhouse is a large, brick building facing onto The Green, though it is the former agricultural buildings that are more dominant in the street scene as they front the boundary line. The trees behind the farmhouse retain a rural character, screening any built form beyond. This tree line is also important when approaching along Cuckoo Lane.

The access between West End House and The Stables (both listed) allows a glimpsed view of the roof top of Laurel House and Oakfrith House whose roofs blend in with the agricultural buildings and framed by the trees behind.

Listed Buildings

Green Farmhouse dates from the C17 and was refaced in C18. The early historic maps do not show this as a 'farm', so it is likely to have originally been a Gentry house or yeoman farm, converting to a farm in the C19. Historically, Green Farmhouse was the largest dwelling surrounding The Green, and comparable in size to Manor Farmhouse (GII) which is of a similar date. The width of Green Farmhouse is similar to the earlier C15 Church Farmhouse (GII) which sits opposite the Manor Farmhouse. This shows that Green Farmhouse was of some status responding to the wealth of the area.

The farm building to the east of the Green Farmhouse is Grade II listed and was formed as part of the development of the farmstead in the C19 and recognised as 'Important in its setting with other listed buildings on north side of Green.' The group of farm buildings include a collection of single storey buildings, former open sheds and a privy, all set around a small farmstead but no large barn (such as a threshing barn). Whilst no longer operating as a farmstead, it has not been domesticated.

The significance of Green Farm 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. The farmhouse and associated farm buildings contribute to the character of the conservation area. Whilst no longer an orchard to the rear, the established trees retain a rural setting to the listed buildings and forms a visual separation between the historic buildings around The Green and the more modern development beyond.

Pyncent Cottage (GII) is a small, timber framed thatched cottage of a similar age to Green Farmhouse (C17), both of which contrast with the polite architecture of West End House (GII), that was constructed in the early-mid C19 with a group of single storey buildings to the rear.

The setting of these buildings is the group value, responding to the rural location, with a similar scale which contrasts to the smaller terraced and new build properties (excluding Oakfrith House).

Assessment: The proposed scheme looks to extend the access to Laurel House and Oakfrith House to the proposed new site which is behind Green Farm by bringing the new driveway closer to the former farm buildings (GII). The drive will be formed of permeable gravel through a gated entrance. From the street scene, this new access will not be visible due to the existing farm buildings, and therefore there is no harm to the character of the conservation area. The use of a simple 5-bar gate would not be uncommon within a farm setting, but a more formal track would be more uncommon. The proposed material choice offers a softer appearance than a block or tarmac surface, so would reduce any visual impact on the setting of the listed buildings.

The curtilage of the new build will be fenced with a post and 3-rail fence, retaining the existing hedges. From the existing and proposed plans, there is no indication about the proposed loss of trees. As these are within the conservation area, and presumed to be of a suitable size, they are protected, and any loss will need to be considered. As noted, the trees within this area provide a positive contribution to the character of the conservation area and the setting of the listed buildings. The sub-division of the site to create a new, self-contained dwelling will result in further loss of the historic curtilage of Green Farmhouse which is considered to cause harm to the setting of Green Farmhouse and the farmstead.

The new dwelling is a 'T'-shaped, one and a half storey dwelling, formed of red-orange brick plinth and weatherboarding, under a Double-Roman clay roof covering, with traditional flush casement windows. The design responds to the local buildings, but its scale is larger than the traditional dwellings within the area, including Green Farmhouse and the adjoining listed buildings. Oakfrith House is a substantial house, built in

c.2009 in the style of a converted barn, so the design responded to the former use of the site and the farmstead. The proposed new dwelling will introduce further development and form to a historically open site that formed part of the Green Farmhouse land, with a design that is based on a domestic dwelling.

At present there is no proposed garage or outbuildings proposed though these could be formed later. The potential for incremental harm through permitted development rights (PDR) will contribute to the over-development within this area. Therefore, there is a concern of future pressure for development of either outbuildings or garages to both Green Farmhouse and the new build which would result in harm to the setting of Green Farmhouse & associated farm buildings and Pyncent Cottage. To allow for the additional structures, it is likely to have the additional pressure to reduce or remove the trees which would have an additional negative impact on the designated heritage assets, though these trees will have some protection as they are visible within the conservation area.

It is acknowledged that within the setting there has been piecemeal development that has altered the street scene, including the setting of the listed buildings. This development has been to a scale that responds to the historic grain and development pattern of the village. The proposed scale is not considered proportional to the historic grain of the conservation area and responds more to the footprint of Urchfont Manor (II*, C15, c.1680 & C18). It is acknowledged that the height has been limited by designing it as a one and a half storey, but due to the increases in ceiling heights, this means that the ridge is 8m, and therefore it is a similar height or taller than the host dwelling (c.7m). Whilst there is some balance with the height and scale of Oakfrith House, which was designed to appear like a barn, the increase in ridge height adds to the dominance of the new buildings within the setting of the listed buildings.

This development is considered to be backland development which does not follow the historic grain or development pattern of Urchfont. The precedent has been accepted with the construction of Oakfrith House, which as previously noted was designed as a 'barn' rather than a domestic dwelling, which responded to the historic use of the site.

The historic OS maps show a changing domestic curtilage for the house, but the site has been part of the ownership and historic curtilage of Green Farmhouse, with a close working relationship between the house and grounds, and later the farm buildings, resulting in the name and the creation of the Grade II listed farm buildings.

Design

The proposed design has considered the local architectural form and traditional materials. The proposed scale of the building has tried reducing the height by the designing a one and a half storey dwelling, but due to the modern building regulations, this still creates a taller building of 8m. Mitigation could be by reducing the height to ensure that it is subservient to the host dwelling.

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 Green Farmhouse through the gradual loss of land associated with the property and the incremental development of self-contained plots which introduces boundary treatments, built form and hard standing. The proposed height and scale of the new dwelling is not considered to be subservient to the host dwelling, and whilst there is some separation, the setting of the listed building is not considered from a specific distance, and therefore the scale of the building is considered to be dominating within the grounds.

The proposals will result in harm to the character of the Urchfont Conservation Area due to the loss of the established trees.

The proposals would be considered as causing 'less than substantial harm' (at the low end of the scale) for the purposes of interpreting the NPPF. 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, this assessment would form part of the planning balance undertaken by the Case Officer. I note that precedent has recently been set with the approval of Oakfrith House, however, this was designed as an agricultural building. The proposed scheme is domestic in appearance and includes the domestic paraphernalia that is associated with a domestic dwelling, rather than the agricultural grounds.

If this application is to be approved, it is recommended that a condition is applied to ensure no further development would be acceptable, or a restriction on PDR to prevent further incremental development and loss of trees as these would result in harm to the setting of the listed buildings and the character of the conservation area.