

Wiltshire Council Planning Consultation Response

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(South/West)

Officer's Name:Jemma Foster
Officer's Title: Senior Planning Officer

Application No: PL/2026/02268 PP and PL/2026/02263 LBC
Land West of North Lodge, 128 High Street, Codford St Peter, BA12 0NJ
Erection of two detached dwellings with new access and associated works

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. 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.

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.

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.

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...”

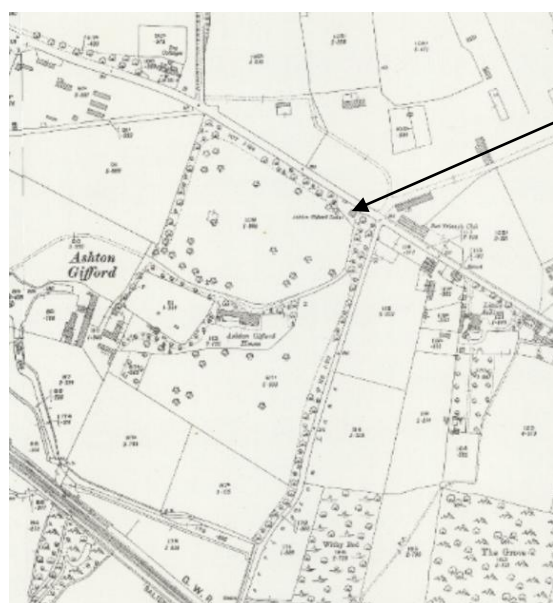
“While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over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

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

Site and assets considered:

The site is part of the former parkland to Ashton Gifford House. This element of the parkland became separated from the main parkland when the A36 was constructed.

Ashton Gifford House is a grade II listed house, listed in December 1987. I note that the list description says it was used as a school from the 1940s to the 1980s.



Ashton Gifford Lodge (now known as North Lodge)

1898-1939 OS map

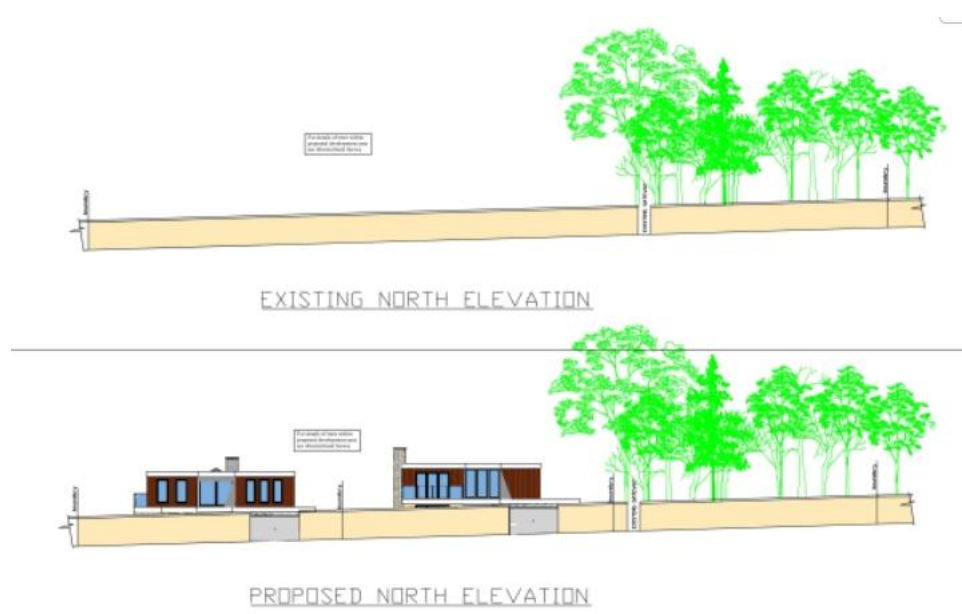
Ancillary structures in the curtilage of the principal listed building (Ashton Gifford House) are covered by the listing for the principal building **if they meet certain criteria**. In this case, we (the LPA) have judged that

the former estate wall is covered by the listing (collequially known as 'curtilage listed'). To note: the lodge, whilst clearly linked formerly to Ashton Gifford house is not covered by the listing (not meeting the determining criteria) as it is a dwelling in its own right.

The wall has an existing access/gateway.

Proposal:

Two new houses are proposed, each with its own driveway, as such, two new openings in the existing wall are proposed.



Issues: impact on the character and significance of this curtilage listed wall.

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" (Rev C 27/4/2026). The Heritage statement appears to have been 'tacked on' to the Design and Access Statement'. It is clear the document is not written by a heritage consultant and fails to assess the significance of the designated heritage asset (the wall). As a result, it fails to meet the requirements of the NPPF. 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 wall lies in its historic fabric, form and former relationship with Ashton Gifford House and the lodge. The wall, together with the lodge, are evidence of the former extent of the parkland to Ashton Gifford House – and as such it has *evidential interest*. That the wall is a long stretch of wall with minimum openings is of significance as its form is characteristic of estate park walls which were designed with only a few openings (often ‘policed’ by lodges) to keep people out and livestock in.

Assessment:

I do not wish to comment on the design of the two houses although I would note that it would be preferable to have two single-storey structures such that they were less visible above the top of the wall (thereby preserving the idea of the wall enclosing a parkland).

However, given I have assessed that the significance of the wall is in part due to its unbroken character (ie minimum openings), I clearly have concerns about the two proposed new openings. I would strongly recommend that there is one shared opening to minimise the loss of historic fabric and adverse impact on its character. I would also recommend that some kind of close boarded gate is conditioned to ensure that the palisade effect is maintained after the houses are constructed.

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 some harm to the listed asset (the wall) 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 structure, and furthermore a curtilage listed structure, and so I consider the harm to be ‘less than substantial harm’ for the purposes of interpreting the NPPF. However, the wording of NPPF requires that the LPA pay ‘special regard’ to preserving the heritage asset.

Whilst paragraph 215 of the NPPF allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case the proposals are a result of the development of two houses and as such primarily for the convenience of the future 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 that the proposals are reconsidered.**