

## APPLICATION FOR FULL-PLANNING PERMISSION CASE OFFICER REPORT

|                                 |                                                                                                                           |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>APPLICATION REFERENCE:</b>   | PL/2026/01303                                                                                                             |
| <b>APPLICATION TYPE:</b>        | Full planning permission                                                                                                  |
| <b>SITE ADDRESS:</b>            | Wick Farm, Wick Lane, Lacock, Chippenham, SN15 2LU                                                                        |
| <b>DEVELOPMENT DESCRIPTION:</b> | Full application (retrospective) for the partial rebuilding and conversion of agricultural buildings into 3 no dwellings. |
| <b>RECOMMENDATION:</b>          | Refuse                                                                                                                    |

### SITE DESCRIPTION/CONTEXT

Wick Farm is located at the end of a rural spur road off 'Wick Lane' which runs west off the A350 at Lacock, initially as 'Folly Lane West'; Wick Lane itself runs on west a further 460m to terminate at Cartridge Farm. The site is some 1.3km due west of that main road and is set within the open countryside, with agricultural land in each direction.

The wider farmstead site comprises a number of buildings, including the farmhouse itself set to the north of the collection, a number of outbuildings (some of which have been converted from their former agricultural use), as well as retained agricultural buildings.

The building(s) the subject of this application are set to the west of the collection of farm buildings and are clearly visible on the vehicular approach to the farmstead site, which is taken from the north-west. In that this application is retrospective in nature, the buildings the subject of this application are shown in the photographs below, with 'Barn A' being to the north (right in the second image), 'Barn B' the adjoining building and 'Barn C' being the separate building to the south:



Subject buildings from the east (Barn C to the left, Barns B and A to the right)

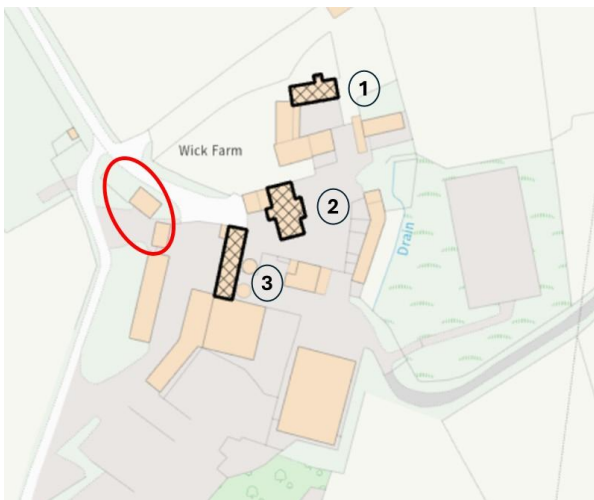


Subject buildings from rear (west) (Barn B, left and Barn A, right)

In terms of constraints, most notably the wider site contains three separate listed buildings, these being:

1. Little Wick Farmhouse – Grade II (List Entry Number: 1022203)
2. Barn at Wick Farm – Grade II\* (List Entry Number: 1022204)
3. Stable and Barn Range to South West of Wick Farmhouse – Grade II (List Entry Number: 1198716)

These are shown on the plan extract below and the Historic England list entries are included at Annex 1 to this Report.



Listed buildings on the farmstead site (application buildings circled red)

Barn 2 is of particular note, being Grade II\* listed and a relatively rare example of a barn of such age, and being in a relatively good state of repair. Being evident on historic tythe and OS maps, the buildings the subject of this application are considered to be curtilage listed (this is expanded on below).

The application site is not crossed by any Public Rights of Way, although there are Rights of Way crossing the wider farm holding, in particular LACO2 which runs broadly east-west some 300m to the south of the site. The site is within flood zone 1 and not shown to be at any elevated risk of flooding from other sources. The site is located within the Avon Vales landscape character area.

## PROPOSAL

The application seeks permission for the partial re-building of the building and their conversion to create 3no. dwellings. The submitted plans show that each of the 3no. buildings are of two-storey form, with Barn A being a 3-bed, Barn B a 1-bed (plus 'office') and Barn C also a 1-bed. It appears that whilst the proposal does not increase the footprint of the buildings, a raised roof has been introduced on Barn A. Both door and window openings are shown at ground floor level to each of the buildings; natural light is generally provided to the first floor level through rooflights.

## PLANNING HISTORY

The following previous planning applications relate to both the immediate site and also the wider farmstead site:

| <b>Proposal / Summary</b>                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PL/2026/01300 - Full planning permission – Full application (retrospective) for the alteration and conversion of a former laundry / garden store to one 1-bed dwelling (currently live)                                                                 |
| PL/2025/06320 - Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses Decision - Prior Approval Refused Date: 23/9/2025 – Change of use from steel frame agricultural barn into 1x two storey dwelling.                               |
| PL/2025/06292 - Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses Decision - Prior Approval Refused Date: 22/9/2025 – Change of use of steel frame agricultural barn into two, two storey dwellings.                              |
| PL/2025/05399 - Prior notification: Building Decision - Prior Approval Not Required Date: 25/7/2025 – Steel frame barn                                                                                                                                  |
| PL/2024/11134 - Prior notification: Building Decision - Prior Approval Not Required Date: 13/1/2025 – Steel Frame Barn                                                                                                                                  |
| PL/2024/03419 - Prior notification: Building Decision - Prior Approval Not Required Date: 7/5/2024 – Steel Framed, Clad barn                                                                                                                            |
| 20/03232/SCR - Screening Opinion - TCPA EIA 2006 Decision - OPIN- Screening Opinion Date: 18/5/2020 – EIA Screening Opinion request relating to a proposed solar farm                                                                                   |
| 15/08257/FUL - Full planning permission Decision - Disposed of Date: 25/5/2018 – Proposed Change of Use from Agricultural to Commercial Equestrian Use to include Stabling & Tack Rooms within Existing Building, All-Weather Riding Area & 2 Paddocks. |
| N/03/03086/LBC - Listed building consent Decision - Approve with Conditions Date: 25/6/2004 – INTERNAL AND EXTERNAL ALTERATIONS AND SINGLE STOREY EXTENSION TO AGRICULTURAL BUILDINGS TO CONVERT TO THREE WORKSHOP UNITS                                |
| N/03/02910/COU - Full planning permission Decision - Approve with Conditions Date: 25/6/2004 – CHANGE OF USE OF VACANT AGRICULTURAL BUILDINGS TO THREE WORKSHOP UNITS                                                                                   |
| N/99/02689/LBC - Listed building consent – DEMOLITION OF GARDEN STORE AND CONSTRUCTION OF NEW STORE AND LAUNDRY FOR EXISTING HOLIDAY ACCOMMODATION                                                                                                      |

|                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| N/99/02683/FUL - Full planning permission Decision - Unknown Date: 29/2/2000 – CONSTRUCTION OF LAUNDRY /GARDEN STORE FOR EXISTING HOLIDAY ACCOMMODATION |
| N/94/00503/FUL - Full planning permission Decision - Approved Date: 10/5/1994 – 2 NO AGRICULTURAL BARNS 2 NO AGRICULTURAL BARNS                         |
| N/93/00862/LBC - Listed building consent Decision - Approved Date: 21/1/1998 – REPLACEMENT WINDOWS TO FARMHOUSE REPLACE WINDOWS TO FARMHOUSE            |
| N/92/02008/FUL - Full planning permission Decision - Approved Date: 18/12/1992 – ERECTION OF A BLOCK OF FOUR STABLES STABLE BLOCK                       |
| N/90/01325/LBC - Listed building consent Decision - Approved Date: 20/8/1990 – REMOVE REMAINS OF DOVECOTE                                               |

Of the above, historic applications N/03/03086/LBC and N/03/02910/COU, which relate to conversion of the buildings to three workshop units, are of direct relevance to this application proposal and are considered in further detail below.

## RELEVANT LEGISLATION, POLICIES AND GUIDANCE

### Statutory Legislation:

- The Town & Country Planning Act 1990
- Planning (Listed Buildings and Conservation Areas) Act 1990

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 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.

### National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

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 213-215 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 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.

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 LBC (and planning permission).

*Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency*, provides advice in support of consistent decision making on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

#### Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 10 Spatial Strategy for the Chippenham Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 48 Supporting Rural Life
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 56 Contaminated Land;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 58 Ensuring the Conservation of the Historic Environment;
- Core Policy 60 Sustainable Transport;
- Core Policy 61 Transport & Development;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 67 Flood Risk;
- Core Policy 68 Water Resources;

In particular the following policies give an indication of the Council's approach to development affecting heritage assets:

- Core Policy 57 '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.

- Core Policy 58 '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."

#### Draft Wiltshire Local Plan Policies

The examination of the emerging Wiltshire Local Plan has been paused and the weight to be afforded to any part of the emerging plan can be no more than very limited. A decision on how to proceed will be made by the Council in May 2026.

Neighbourhood Plan: N/A

#### Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015

### **ISSUES**

The main issues that need to be addressed in this case include:

- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would preserve or enhance the historic environment (CP 58)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 61 and 64)
- Are there any other planning issues raised by the development?

### **CONSULTATION RESPONSES**

WC Highways: Objection based on unsustainable location in terms of travel by means other than private vehicle / no objection on access, parking or highway safety.

WC Conservation: Objection based on heritage harm.

WC Public Protection: No objection subject to condition regarding working hours.

WC Economic Development: Comment provided on the potential tourism use of the buildings.

Parish/Town Council: No comment received.

### **REPRESENTATIONS**

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site;

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

No third party representations were received with regard to this application.

## **ASSESSMENT**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

*"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."*

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

## **Principle of Development**

### *Policy Context*

Core Policy 1: Settlement Strategy of the WCS establishes a hierarchy of settlements to guide where development should be focused. The policy prioritises growth in: Principal Settlements, Market Towns, Local Service Centres, Large and Small Villages, and then outside the defined settlements, where development is strictly controlled and generally not supported unless exceptional circumstances apply.

Core Policy 2: Delivery Strategy of the WCS sets out how development will be distributed and delivered across Wiltshire. The policy emphasises:

- Sustainable patterns of growth, reducing the need to travel and supporting local services.
- Development should be plan-led, aligning with the settlement strategy and supported by infrastructure.
- Windfall development (not allocated in plans) must still comply with the principles of sustainable development.
- Development outside settlement boundaries is generally not permitted, unless it meets specific policy exceptions (as set out in paragraph 4.25 of the WCS).

Together, CP1 and CP2 ensure that new development is strategically located, sustainable, and supports the character and function of Wiltshire's communities.

The specific policy exceptions set out at paragraph 4.25 include reference to Core Policy 48 which refers to 'Supporting rural life'. Core Policy 48 sets a generally positive context for conversion of rural buildings to employment, tourism, cultural and community uses provided that 5no. specific criteria are met. These relate to the following: (i) the building is structurally capable of conversion; (ii) the use would not detract from the character or appearance of the landscape; (iii) the building can be served by adequate access and infrastructure; (iv) reasonable access to local services; and (v) the conversion or re-use of a heritage asset would lead to its viable long term safeguarding.

Only where there is 'clear evidence' that these uses are not practical propositions would conversion to a residential use be considered.

### *Assessment and Conclusion*

Given the curtilage listed status of the building there is a presumption to ensure its viable long term safeguarding (criterion v). However, this presumption does not over-ride the other policy requirements, and in particular that conversion to residential would only be supported where 'clear evidence' has been provided that preferred uses are not 'practical propositions'. In this instance, no such evidence has been provided and as such the proposal is not considered acceptable in principle. This conclusion is supported by the conclusions of the Council's Economic Development Officer, who after visiting the site and noting the tourism context, concluded that the site and buildings would be likely to be marketable and viable for a tourism use.

### **5 Year Housing Land Supply**

The Wiltshire Housing Land Supply Statement (June 2025) provides the latest position on the Council's ability to demonstrate a five-year supply of deliverable housing land, which is a material consideration in the determination of planning applications.

The National Planning Policy Framework was revised in December 2024. This has reintroduced the requirement to meet five years' worth of deliverable sites and a buffer to be applied to the five-year housing requirement in all circumstances, and has revised the Local Housing Need calculation to establish the five-year housing requirement. These factors have resulted in a substantial increase in the five-year housing requirement to be met from the previous calculation. When this is assessed against the housing land supply which can be delivered within five years, the recalculation shows a significant reduction in the number of years supply. The resulting position shows that the Council can currently demonstrate a 2.42 years housing land supply of housing at a unitary authority level. This is considered to be a substantial shortfall.

The absence of a five-year housing land supply is a material consideration in the determination of this application. In accordance with Paragraphs 78 and 11(d) of the National Planning Policy Framework (NPPF), for applications involving the provision of housing, where there is a shortfall in the supply of deliverable housing sites, the most important policies for determining the application should be considered out of date. The current housing land supply shortfall is a factor that must be considered in the planning balance and in this case, as a five-year

housing land supply cannot be demonstrated, the weight that can be applied to the most important policies for determining this application should be assessed and altered in the light of the shortage in housing land supply. The proposal must be assessed against the national policy context of the need to boost housing supply and the benefits of delivering new homes whilst having particular regard to the key policies set out in paragraph 11(d)(ii) and Footnote 9 of the NPPF.

## **Design and Impact on the Character and Appearance of the Area**

### *Policy Context*

Core Policy 57 of the WCS requires high-quality design that:

- Enhances local character.
- Responds to the natural, historic, and built environment.
- Retains important features (e.g., trees, hedges).
- Supports sustainable construction and compatibility with surrounding uses.
- Creates safe, legible, and accessible spaces.

Section 12 of the NPPF emphasises design that is:

- Visually attractive.
- Functionally effective.
- Contributes to the quality of the built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Building for a Healthy Life Framework promotes healthy, inclusive, and sustainable places. The document encourages:

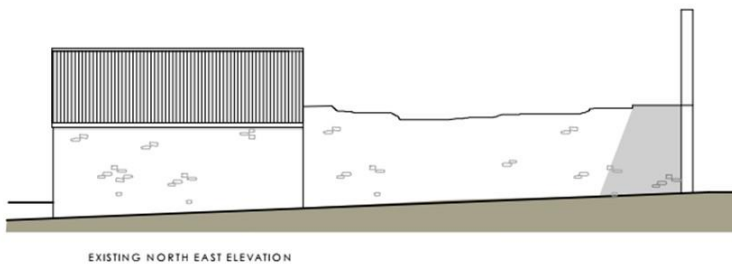
- Walkability.
- Access to green space.
- Active design principles for well-being.

### *Assessment*

The application is supported by a Design, Access & Heritage Statement. This confirms that the proposal involves the 're-building and conversion of existing stone barns to residential use' (paragraph 17). Historic aerial and streetview images publicly available on-line (extracts below) confirm that as of May 2032 the buildings were not in active use and indeed very little of Barn A appears to be in existence other than the north end gable wall. This casts some doubt on the accuracy of the submitted 'existing elevation drawings submitted with the application (also extracted below), which show relatively substantial parts of the elevations.



Google streetview image, May 2023 / associated aerial image



Extract from submitted Existing Elevations Barn A & B (drawing 134/EX/02)

From the above, it is evident that: (i) the planning permission granted in 2003 for the conversion of the buildings to workshop use was never implemented; and (ii) Barn A in particular has been substantially re-built. In terms of the scale of the re-building work to Barn A, analysis of the 2003 permission demonstrates that this has been re-built to a greater height than the original barn, with the drawings from that approval (N/03/03086/LBC & N/03/02910/COU) showing the eaves level running flush through Barns A and B, as shown in the drawing extract below:



Proposed Elevations – Unit1 (revised, as approved)

Furthermore, as well as this additional scale, the submitted Proposed Elevation drawings show a large number of openings along both sides of the buildings, giving them an overtly residential appearance. This residential character and appearance is compounded by the creation of separate curtilage areas for the units, delineated by stone walling to the south-west of the buildings.

## *Conclusion*

Issues regarding the nature and detailing of the re-building work is considered in further detail below, given the heritage issues and considerations raised. However, it is clear that substantial re-building work has taken place, and the appearance of the building has been materially and significantly changed from how the building(s) would have appeared initially, and indeed how they were shown on the previous approval for the works to convert the building to workshop use. As such, the application gives rise to conflict with Core Policy 57 (WCS), as well as Section 12 of the NPPF, in particular paragraph 135.

## **Impact on Heritage Assets**

### *Policy Context*

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 listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Act 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 for planning. Chapter 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. In particular:

Paragraph 208 requires LPAs should “avoid or minimise any conflict” between the heritage asset’s conservation (which includes achieving its optimum viable use) and any aspect of a proposal.

Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable new uses and of new development making a positive contribution to local character and distinctiveness.

Paragraphs 212 requires “great weight” to be given to an asset’s conservation “irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.” Paragraph 213 advises that harm to the significance of a designated heritage asset should require “clear and convincing justification”. Paragraphs 213-215 require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved – this balancing is set out below.

The 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 and non-designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance and encourages proposals which improve the condition of heritage assets at risk.

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. The policy requires applicants to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) responding to the value of the natural and historic environment and being sympathetic to and conserving historic buildings and landscapes. Development is required to respond positively to the existing 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.

### *Assessment*

Following on from the analysis set out above regarding the scale and appearance of the buildings, the heritage issues and considerations relating to this application are of fundamental relevance and significance.

Firstly, in terms of the status of the subject buildings, these are considered to be curtilage listed. This is an established and long-standing position of the Council, and a matter of public record. As such, any works proposed to be undertaken to the building would be required to be subject to listed building consent – any works undertaken without such consent are unlawful and potentially a criminal offence.

The case made in the submitted Design, Access & Heritage Statement is that the buildings should not be curtilage listed is noted. However, having reviewed the history and visited the site on two separate occasions, the Conservation Officer's advice and conclusion on this point is clear that the buildings are indeed curtilage listed and the Applicant's position on this is not considered to hold any weight given the established history.

Secondly, the re-building works have not been undertaken in a suitably sensitive and appropriate manner. The Conservation Officer comments explain that:

*"In this case the significance of the farmhouse and farm buildings is evident in their vernacular architecture its form, layout, materials, and architectural expression/detailing which have significant aesthetic and architectural interest and the farmhouse and threshing barn have added historical interest especially in the barns quality of craftsmanship in the walling and roof structure."*

This has clearly not been respected in the application proposal. The Conservation Officer's response sets out in detail the issues arising from the proposal and given the nature of the application are appended in full to this Officer Report at Annex 2. In summary, their objection to the application is well-considered and firm, concluding that:

*"... The resulting substantially new build barns A and B have not adhered to good practice in respect of Historic England guidance on Adapting Farm buildings with respect to plan form subdivision new openings, raising the roof and introduction of rooflights," ... and, "... I cannot*

*support the retrospective proposal for Barns A and B as the harm includes substantial/total demolition to the barns as curtilage listed buildings, rebuilding to larger scale, massing, height and roof form (creation of raised building to accommodate a second floor), subdivision of plan form, openings and materials detail use. These elements have combined in a resulting poor quality new build /conversion that is also harmful to the setting of the listed barns and farmhouse.”*

### *Conclusion*

Based on the scale, nature and detail of the proposed works, the Conservation Officer's response is clear and unequivocal that the proposal is fundamentally unacceptable. The conflict arising with CP58 (WCS) is clear, as well as Section 16 of the NPPF which seeks to safeguard heritage assets, in particular paragraphs 212 – 216.

## **Amenity**

### *Policy Context*

Core Policy 57 (Point vii) of the Wiltshire Core Strategy requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents. The National Planning Policy Framework (NPPF), particularly Paragraph 135, reinforces the need for development to provide a high standard of amenity for both existing and future users.

### *Assessment*

Barn C is off-set to Barn B and given their spatial relationship, with the buildings being set apart by a distance of just 2.5m, there is potential for overlooking from the north-west elevation of Barn C into the curtilage of Barn B. However, the only opening shown on the north elevation of Barn C is a single rooflight, which serves the bathroom. As such, and given that this could be conditioned to be obscure glazed, the amenity impact is considered to be negligible and not warrant a reason for refusal.

### *Conclusion*

There are no other amenity issues arising, including loss of light / overshadowing, or noise impacts, given the proposed introduction of a residential use to the immediate locality. As such there is not considered to be any conflict with Core Policy 57 (WCS).

## **Highways Impacts and Parking**

### *Policy Context*

Transport implications are a key factor in assessing planning applications, especially for larger developments. Proposals must demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, and those with mobility impairments.
- No severe residual impacts on the surrounding highway network.
- Promotion of sustainable travel, reducing reliance on private vehicles.

- Adequate parking and cycle provision, in line with adopted standards.
- Protection and enhancement of public rights of way and active travel routes.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

Proposals must also ensure safe access for refuse collection vehicles and comply with the Wiltshire Council Waste Storage and Collection SPD (2017).

Where necessary, Transport Assessments or Statements should be submitted to evaluate impacts and identify mitigation. Planning conditions or legal agreements may be used to secure off-site improvements, travel plans, or contributions to sustainable transport infrastructure.

### *Assessment and Conclusion*

Given the nature and scope of the application a Transport Assessment is not necessary to support this application. However, the Highway Officer has been consulted and has responded that, whilst the proposal is acceptable in terms of highway impact, it is in an unsustainable location, being within the open countryside in terms of planning policy and not well connected to any services or facilities by sustainable means of transport. As such the application gives rise to conflict with Core Policies 60 and 61 (WCS), as well as paragraphs 84 and 115 of the NPPF (the latter of which is referenced at Footnote 9 of paragraph 11).

### **Other Issues**

In terms of **ecology** impacts, although the application proposal relates to the conversion of an existing building, it appears very likely that roof works have been undertaken to the building(s). As the site does not fall within any designated Special Area of Conservation (SAC) for bats, consultation with the Ecology Officer would not necessarily be triggered. However, bats remain a protected species and were any permission to be granted for old buildings such as these, an informative would be added to advise of their protection and measures to be taken should any bats be encountered whilst works are undertaken.

Given the nature and scope of this application there are not considered to be any **landscape** or **flood risk / drainage** issues arising.

### **PLANNING BALANCE AND CONCLUSION**

At the heart of the NPPF there is a presumption in favour of sustainable development requiring local planning authorities to approve development proposals that accord with an up-to-date development plan without delay; and where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless (taken from paragraph 11d of the NPPF):

- The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole;

Having regard to paragraph 11(d) of the National Planning Policy Framework and footnote 7, the Local Planning Authority does not consider that the presumption in favour of sustainable development ('tilted balance') is engaged, as the relevant policies of the NPPF that protect areas or assets of particular importance provide a strong reason for refusing the development. In this case, the buildings are designated heritage assets and form part of a group of buildings with significant heritage interest.

The application seeks permission for the re-building and conversion of the buildings to residential use. Were new dwellings being proposed in this location then this would clearly be contrary to Core Policies 1 and 2 (WCS), as well as Core Policies 60 and 61 (WCS) as outlined in the Highway Officer's response due to the unsustainable location. When considered against CP48, there has been no demonstrable evidence submitted in support of the application demonstrating that other uses do not represent 'practical propositions.' Indeed, the Council's Economic Development Officer has concluded that the site and buildings would be likely to be marketable and viable for a tourism use.

Alongside these objections to the acceptability of the principle of the proposal, based on the scale, nature and detail of the proposed works, there is significant conflict arising with Core Policies 57 and 58 (WCS), as well as Sections 12 (paragraph 135) and 16 (paragraphs 212 216) of the NPPF. The Conservation Officer's position is clear and unequivocal that the proposal is fundamentally unacceptable due to the heritage harm arising.

The NPPF advises that heritage harm should be: "... *weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*" (paragraph 215). In this case, the provision of the open market dwellings given the current housing land supply shortfall represents a benefit which is attributed significant weight. However, given the largely retrospective nature of the proposal, the weight attributed to any economic benefit arising through construction is now materially diminished; similarly there are no ecological / BNG to weigh in favour of the application. In terms of securing the 'viable use of the building', the design and heritage impacts set out in this report with regard to the conversion and re-construction works which have been undertaken, are considered to limit the relevance and applicability of this consideration.

In the context of NPPF paragraph 11, the heritage harm caused represents a strong reason for refusing the development. Although the Council cannot currently demonstrate a 5 year housing land supply, these adverse impacts arising would significantly and demonstrably outweigh the benefits arising from the delivery of housing and the associated construction phase benefits. For these reasons the application is recommended for refusal.

## **RECOMMENDATION:**

**That Planning Permission be REFUSED for the following reasons:**

1. The application results in a scale and design of built form which is harmful to the heritage assets, both the curtilage listed buildings themselves and also the setting of the Grade II\* listed barn to the immediate east of the site. The harms relate to the rebuilding to larger scale, massing, height and roof form, subdivision of plan form, openings and materials detail use. These elements have combined to result in a poor quality new build / conversion that is also harmful to the setting of the listed barns and farmhouse. The design and heritage harm arising conflicts with Core Policies 57 and 58 (WCS), as well as Sections 12 (paragraph 135) and 16 (paragraphs 212 – 216) of the NPPF.
2. The application proposes the change of use of the buildings to residential use. Under the provisions of Core Policy 48 (WCS), such a change of use would only be acceptable where other uses – including employment, tourism, and cultural and community uses – have been demonstrated as being not practical propositions. Insufficient evidence has been submitted with the application to demonstrate that these alternatives are not practical propositions and as such the application conflicts with Core Policy 48 (WCS), along with Core Policies 1, 2, 60 and 61 (WCS) given the unsustainable location of the site.

## **ANNEX 1: Historic England list entries**

### **1. Little Wick Farmhouse – Grade II (List Entry Number: 1022203)**

*'LACOCK WICK LANE, ST 96 NW, 3/180 Wick Farmhouse and Little Wick, 20.12.60, GV II Farmhouse, C19 rebuilding of C16 or earlier house, C18 rear wing. Rubble stone with stone slate roofs. Front range has coped gables and end stacks, the right stack C16 or earlier, partially corbelled out. Two-storey, 3-window C19 front with raised quoins, band and eaves band, windows in plain raised surrounds and centre door with hood on brackets. Rear wing (Little Wick) has cyma-moulded 2-light recessed mullion windows and some casements, 3-window range to inner court and 2 gabled dormers. Attached, enclosing court, is 2-storey early C19 dairy, cheese room and cider house of squared rubble stone with end stacks and cambered brick heads to openings. First floor triple casement and 6-pane window, ground floor door, triple casement, door, door and 6-pane window. Said to be dated 1816 on beam in cider-press room. Wick is recorded as a manor held by Croke family in C13 and later by the Bonham family.'*

### **2. Barn at Wick Farm – Grade II\* (List Entry Number: 1022204)**

*'LACOCK WICK LANE ST 96 NW 3/182 Barn at Wick Farm 20-12-60 GV II\* Barn, C15, rubble stone with Bridgwater tile roof. Central projecting gabled cart-entries each side, north entry with plain weatherboarded gable, south gable in stone with coping. Chamfered jambs and timber lintels. Buttress to wall each side of cart-entries. Heavy corner stones, one with 2 scratch-dials inscribed. South cart entry has chamfered Tudor-arched timber lintel to side door. Five-bay interior with 2-purlin roof and 2 tiers of curved windbraces. Three raised cruck trusses with arch-braced cambered collars and, against end walls, 2 tie-beam-and-collar trusses.'*

### **3. Stable and Barn Range to South West of Wick Farmhouse – Grade II (List Entry Number: 1198716)**

*'LACOCK WICK LANE, ST 96 NW, 3/183 Stable and barn range to south west of Wick Farmhouse, GV II Stable and barn range, C18 rubble stone under continuous stone slate roof. Flush quoins. Barn section has plain double doors each side. Stable range, to right has 2 doors with timber lintels and central upper loading door. Six-bay tie-beam-and-collar truss roof, double purlin with straight windbraces.'*

## ANNEX 2: Conservation Officer Comments

PL/2026/01303

Site: Wick Farm, Wick Lane, Lacock, Chippenham, SN15 2LU

Proposals: Full application (retrospective) for the partial rebuilding and conversion of agricultural buildings into 3 no dwellings.

Conservation Officer: Alex Marsh

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### **Recommendations:**

|                                     |                                                                             |
|-------------------------------------|-----------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | Comment                                                                     |
| <input type="checkbox"/>            | Support in principle subject to amendments to the scheme (as set out below) |
| <input type="checkbox"/>            | Support subject to conditions (as set out below)                            |
| <input checked="" type="checkbox"/> | Object (for reasons set out below)                                          |
| <input type="checkbox"/>            | 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 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.

210. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness

213-15 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.

216. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

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

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."

Historic England Guidance on Adapting Traditional Farm Buildings

**Heritage Assets:**

Wick Farmhouse grade II

Barn at Wick Farm grade II\*

Stable and Barn Range SW of Wick Farmhouse grade II

**Site and assets considered:**

Wick Farm is an isolated farmstead located about 1.3 km west of Lacock and the A350. It is a Manor with roots in the 13<sup>th</sup> century.

It contains a two storey Farmhouse a 19<sup>th</sup> century rebuild of a 16<sup>th</sup> century or earlier farmhouse. It is rubble stone with stone slate roofs and includes a 16<sup>th</sup> century partially corbelled stack. The front is a three-window range 19<sup>th</sup> century with raised quoins band and eaves band. The windows have a plain raised surrounds and central door with hood on brackets.

The front of the farmhouse overlooks two listed barns one of which is a threshing barn of 15<sup>th</sup> century built-in rubble stone and tile roof. There are buttresses either side of the central projecting cart entries and there are heavy corner stones.

The roof is particularly good Tudor roof structure with a five-bay interior with two purlin roof and two tiers of curved wind braces. Three raised cruck trusses with arch braced cambered collars and against the walls two tie beam and collar trusses.

The other barn is 18<sup>th</sup> century rubble stone under continuous stone slate roof with 6 bay tie beam and collar truss roof double purlin with straight wind braces.

The application building is an attached pair of formerly ruinous single storey farm buildings at the entrance to the farmstead. Barns A and B. They have been reconstructed of rubble stone with Roman tile roof.

The other barn, Barn C in the application, is a smaller single storey barn that was intact in 2023 with rubble stone walls and tile roof.

Based on google street view in 2023 the lower smaller end barn (Barn B) was substantially intact with the roof and two side walls. The south gable end was open as was the north gable end where it connected to the larger footprint and wider single storey building.

In 2023 Barn A consisted of a standing north gable end wall. The eaves of the gable end where in line with lower building which would appear that the roof would have run through at similar eaves and ridge height.

**Curtilage Listing**

The applicants comments at paragraphs 28 identifies the Calderdale Test 29 considers the barns are physically separate from the listed farmhouse the grade II\* barn and the grade II stable and barn range that they did not form part of the functional domestic or operational farmstead of the listed assets and conclude 30 of the Design and Access Statement *'it is our opinion that the buildings subject to this application should not be considered as curtilage listed.*

All these Barns A, B and C are evident on the 1840 tithe map and 1880 1<sup>st</sup> Ed OS mapping. They are in a loose arrangement with the other farmyard buildings including the two listed barns about 25 - 30 m away and the farmhouse 45 m to north east.

These barns A, B and C are considered curtilage listed buildings.

**Relevant planning history:**

**N/03/03086/LBC Internal and External alterations and extension to agricultural buildings to convert to three workshops**



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

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 farmhouse and farm buildings is evident in their vernacular architecture its form, layout, materials, and architectural expression/detailing which have significant aesthetic and architectural interest and the farmhouse and threshing barn have added historical interest especially in the barns quality of craftsmanship in the walling and roof structure.

### **Assessment:**

This is a retrospective application for the partial rebuilding and conversion of agricultural buildings into 3 no. dwellings.

The attached pair of barns (Barns A and B) have been rebuilt into two, storey and half dwellings.

The larger barn which had a gable end and back (west) wall standing prior to works has been totally rebuilt and substantially raised. It is evident that the gable end wall was taken down and rebuilt and now includes very different new rubble stonework cladding, arrow slot recess and quoins.

The former gable end wall had a much lower eaves and ridge height than is portrayed in the application survey drawing. These drawings are inaccurate and a new set of survey drawings are required. It has about 17 courses of stone work to eaves height based on google street view.

The previous listed building consent shows the proposals repair and rebuilding to the as existing ridge and eaves heights as single storey not two storey buildings.

Its reconstruction is total with modern construction in cavity wall with block work and stone clad. The interior has been plaster boarded and skimmed and painted by the time of my visit.

Barn A curtilage listed barn has been demolished and rebuilt and raised in height. The rebuild has created a ground floor three room plan with staircase centrally to first floor in roof.

The ground floor has 4 x bays if new metal two light casement windows to the new east elevation and to the rear (west) elevation aluminium French door, entrance door and single light casement.

The first floor has three bedrooms each with ensuite bathrooms and 4 rooflights to the east roof slope and 5 rooflights to the east roof slope.

Barn B has two room and W.C on ground floor and two bedrooms and shower room to first floor. The small footprint for a 2 storey 2 bed is not large enough for National Space Standards. The ground floor as measured is 7.6 m x 3.7 m – 28.12 sq m not 30.4 sq m as indicated on the drawings and the first floor 26 sq m should be calculated on floor area with head height over 1.5m the combined floor area is well below the requirement for two bed of 70 sq m and below the single bed space standard of 58 sq m

The elevations have a two light casement to the east elevation and 2 x pair of French doors either side of an entrance door and 3 x rooflights to each roof slope.

Barn C This appears to have been in tact prior to the works and has been less invasive with minor internal plan form alterations. The building appears to have previously been adapted and used for a farm office following the 2003 consent.

There are several issues with the application.

- The demolition of curtilage listed buildings without listed building consent
- The inaccurate survey drawings /existing drawings
- The lack of conformity with space standards for Barn B
- The raising of the eaves and roof of both barns and extensive rebuilding of walls to modern cavity construction with stone cladding.
- The design with substantial new window openings to former blank elevations which are overlarge and horizontal in emphasis.
- Substantial use of rooflights to both roof elevations.
- Formation of fenced domestic curtilages out of character with farmyard.

The works of conversion at the time of my site visit were substantially completed with decorative works ongoing on site.

The application has in their statement suggested the barns are not curtilage listed – and at paragraph 57 suggest the works *‘The proposal involves sensitive conversion of the existing stone buildings and rebuilding within the footprint of the former structures. The scheme respects the scale, form and materials of the existing buildings, preserves the historic character of the farmstead and retaining the rural setting of the surrounding countryside. The design also carefully balances residential amenity with the conservation of heritage assets*

It also comments at paragraph 32 the conversion *‘maintain the traditional stone construction and two storey height in a matter largely consistent with the consented scheme’*

I consider that the evidence in the former application and application of Calderdale Test is sufficient to show that the barns should be considered curtilage listed and the applicant has not accurately depicted the existing survey plans, and the implemented barns do not accord with the evidence of the existing (prior to works) barns A and B in scale, massing, height roof eaves and ridge, architectural appearance and form, openings, solid stone walling and use of materials.

With respect Barns A and B. The demolition of the existing buildings without consent is a significant harm. The inaccurate survey plans is an attempt to cover up the extent of works and demolition.

The resulting substantially new build barns A and B have not adhered to good practice in respect of Historic England guidance on Adapting Farm buildings with respect to plan form subdivision new openings, raising the roof and introduction of rooflights.

The conversion of the Barn C involves minor internal works and subdivision to the previous office building and is in line with good practice for conversions. The internal space standard over two floors is 60 sq m so it also adheres to National Space Standards. The conversion of Barn C to a single dwelling could subject to details and removal of the fenced domestic curtilage could be supported under National and Local Heritage policies.

I cannot support the retrospective proposal for Barns A and B as the harm includes substantial/total demolition to the barns as curtilage listed buildings, rebuilding to larger scale, massing, height and roof form (creation of raised building to accommodate a second floor), subdivision of plan form, openings and materials detail use.

These elements have combined in a resulting poor quality new build /conversion that is also harmful to the setting of the listed barns and farmhouse.

The rebuilding of Barns A and B is contrary to NPPF 213 and 215 seeks justification for harm or loss of significance of a designated heritage asset from its destruction or from development within its setting should require clear and convincing justification through public benefits. The two new dwellings created are not considered to be sufficient justification as public benefits or the optimum viable use for the barns to compensate for the harm caused.

The retrospective proposal is also contrary to 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."

I understand the works are already subject to an Enforcement case. We would need following refusal of this application to consider the appropriate enforcement approach and actions to remove the harm to Barns A and B and the setting of the listed buildings.

**Summary:** 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.

I cannot support the retrospective proposal for Barns A and B as the harm includes substantial/total demolition to the barns as curtilage listed buildings, rebuilding to larger scale, massing, height and roof form (creation of raised building to accommodate a second floor), subdivision of plan form, openings and materials detail use.

These elements have combined in a resulting poor quality new build /conversion that is also harmful to the setting of the listed barns and farmhouse.

The rebuilding of Barns A and B is contrary to NPPF 213 and 215 seeks justification for harm or loss of significance of a designated heritage asset from its destruction or from development within its setting should require clear and convincing justification through public benefits. The two new dwellings created are not considered to be sufficient justification as public benefits or the optimum viable use for the barns to compensate for the harm caused.

The retrospective proposal is also contrary to 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."

I understand the works are already subject to an Enforcement case. We would need following refusal of this application to consider the appropriate enforcement approach and actions to remove the harm to Barns A and B and the setting of the listed buildings.

The conversion of Barn C involves minor internal works and subdivision to the previous office building and is in line with good practice for adaption of historic farm buildings conversions. The conversion of Barn C to a single dwelling could subject to details and removal of the fenced domestic curtilage be supported under National and Local Heritage policies.