

Response to Listed Building Officers comments of 12th May 2026**Application:** PL/2026/02018**Site:** Rixon Farm, Rixon Gate, Ashton Keynes, Swindon, SN6 6QW**Proposal:** Variation of Condition 2 — approved conversion works to former cowshed/barn structure

I write in response to the Listed Building Officer's comments objecting to the proposed amendment to the approved cowshed conversion.

The key point is this:

The officer's assessment treats deep recessing as though it is automatically the least harmful solution. That may be correct for a traditional enclosed masonry barn with discrete door openings, but this is an open-sided cowshed. Its significance lies in the rhythm of the piers, the openness of the bays and the simplicity of the roof structure. A glazed line can preserve that openness better than a more solid recessed infill wall.

The bird-strike concern is capable of being addressed by specification. The applicant is proposing to use low-reflectance, and a UV-reflective coating or otherwise bird-safe glass. The concern should therefore be dealt with by Condition, not by rejecting the glazed design principle. In any case there is no evidence provided by the Conservation officer that traditional glazing recessed has less impact to birds, than that proposed using innovative glass technology, by the applicant.

The applicant respectfully disagrees with the conclusion that the proposed full-height glazed treatment to the south elevation would cause greater heritage harm than the currently approved recessed mixed glazed/timber solution. The objection appears to place excessive weight on the visual primacy of the present stone piers without fully recognising the history, condition and reconstruction of this part of the building.

1. The stone piers were reconstructed from collapsed original material

The officer's report correctly notes that the cowshed had at least partly collapsed and has been substantially rebuilt. It is important to clarify that the stone piers were rebuilt using original collapsed stonework from the former piers. They are therefore not wholly new features, nor are they an unrelated modern invention.

The relevant heritage judgement should distinguish between:

1. the surviving/listed significance of the original agricultural form;
2. the best design approach to preserve the legibility of the former open-fronted cowshed.

The reconstructed stone piers remain important as evidence of the former bay rhythm and agricultural character, though subject to substantial reconstruction. The design issue is therefore principally one of legibility, proportionality and visual interpretation, rather than direct loss of significant historic fabric.

On the matter that the modernist clean lines are at odds with the organic rugged circular stones is a surprising comment from a Conservation officer. The counterpoint between the old and new is usually encouraged as it defines an historic timeline of restoration, and not 'faking out' the past which is often considered retrogressive and poorly thought out. The modernist approach is sometimes used as exemplars of good design by Historic England.

2. The proposed glazing better preserves the open-fronted character

The essential historic character of this building is that of an open-fronted agricultural structure with a simple roof carried on a rhythm of stone piers. The applicant's concern is that the approved solution, by setting a more solid mixed walling arrangement behind the piers, risks domesticating the structure and visually closing the open bays.

The applicant therefore contests the statement by the Conservation officer that the elevation should be more solid than glazed. This would create an entirely different appearance to the one listed, and is contrary to Historic England guidance on Adapting Historic Farm Buildings. Which quotes '*A good understanding of the buildings relationship with its surroundings will ensure that the works conserve and enhance the relationship with the landscape*'. The Conservation officers reply that open sided farm buildings should equally reflect solid, through interpretation of cart doors, to work together to reduce the adverse impacts of full glazing. This response is taken from guidance which refers to existing openings that originally had cart doors, where replacing the doors with glass, can have an impact on the scale of the farm building. That is not the case here.

The proposed full-height glazing seeks to retain the visual reading of the cowshed as a light, open-fronted structure relating more closely to the landscape rather than inserting a conventional wall behind the piers.

The proposed glazing allows the roof, piers, bay rhythm and depth of the former opening to remain visually legible, and unaltered.

In our view a transparent lightweight treatment is arguably more faithful to the original agricultural form than a more solid heavy looking elevation. The building is historically characterised by openness, not by timber-clad or heavily infilled panels.

3. Historic England guidance should be applied flexibly to this building type

The officer relies on Historic England guidance concerning the setting back of glazing within openings. That guidance is helpful, but it is not a rigid rule requiring all glazing to be deeply recessed in all circumstances.

The guidance principally addresses traditional masonry barns with discrete historic openings, such as cart doors and threshing bays, where deep reveals and shadow lines may reduce the impact of inserted traditional glazing. This case is different. The cowshed is not a conventional enclosed masonry barn with individual openings cut into a wall. It is an open-sided structure whose architectural character is created by a repeated rhythm of piers and open bays. The applicant proposes innovative glazing which reduces the impact on the existing structure.

Accordingly, the design objective should not simply be to push glazing as far back as possible. The correct question is whether the proposed intervention best preserves the building's agricultural openness, simplicity, rhythm and legibility.

In the applicant's view, the proposed glazed treatment does so.

It is unlikely that a traditional Farm building would look as the Conservation officer proposes. Columns would not be visually separated from the roof, as he proposes, and walls would run on the outside of the columns/frame. Not on the inside.

4. The approved recessed approach creates its own heritage compromise

The officer accepts that the approved scheme creates a compromise in relation to the new trusses and their connection with the stone columns. That issue should not be dismissed as minor.

The applicant inherited a roofless structure and chose to recover the form of the previous roof structure of inline purlins and collars. This respects the architectural and historic interest of the building. The timber was locally sourced and repurposed. A modern replacement as originally permitted was dismissed as not in the spirit of this Grade II listed building. The relationship between the roof structure, eaves line and supporting piers is central to the architectural reading of this type of building.

The proposed amendment has been developed to resolve that technical and visual difficulty of where column meets truss. It is not minor. The Conservation Officer response, with an internal wall as a minor compromise, would ignore the cost and effort gone into restoring the building to its former structure. A cleaner eaves/glazing detail would avoid an awkward junction and would allow the reconstructed pier-and-roof rhythm to be read more clearly. This is a legitimate heritage benefit and should be weighed against any perceived change in the appearance of the glazed elevation. This approach of exposing the internal roof structure is a key element in guidance from Historic England's Adapting Historic Farm Buildings.

5. Full glazing need not dominate the elevation

The concern that full glazing would give excessive prominence to the south elevation can be addressed by specification and detailing. The applicant would be willing to accept an appropriately worded condition requiring details of:

- slim-profile framing;
- dark/recessive frame colour;
- non-mirrored, low-reflectance or lightly tinted glazing;
- sample panel or manufacturer's specification before installation;
- internal blinds/curtains to be recessive and controlled to avoid visual clutter.

With those controls, the glazing would read as a quiet, lightweight infill rather than a dominant modern facade.

6. Bird-strike concern can be dealt with by condition

The officer raises bird strike as a non-heritage concern. The applicant does not dismiss that issue, but it is not a reason to reject the heritage design approach outright.

Bird strike risk is not determined solely by whether glazing is set back. It is influenced by innovation in glass technology, reflectivity, transparency, surrounding vegetation, lighting, the size of uninterrupted panes and whether birds can perceive the glass as a barrier. Specialist bird-safe products now exist, including UV-coated glass, fritted or etched designed to reduce collisions by making the glazed surface visible to birds while retaining transparency.

The issue can therefore be addressed through a planning condition requiring a bird-safe glazing specification. That may include one or more of the following:

1. low-reflectance external glass;
2. lightly tinted glass where acceptable in heritage terms;
3. fritted or patterned manifestation;
4. UV-coating bird-safe glazing;
5. external surface treatment to interrupt sky/vegetation reflection;
6. avoidance of highly mirrored glass;
7. control of internal lighting where necessary.

A condition of that kind would be more proportionate than maintaining an objection to the design in principle.

7. Suggested condition

If the Council remains concerned about bird strike or visual reflectivity, the applicant would accept a condition in the following form:

Prior to installation of any external glazing to the south elevation of the converted cowshed, full details of the proposed glazing system shall be submitted to and approved in writing by the Local Planning Authority. The details shall include frame profiles, colour, reflectivity, tint, bird-strike mitigation measures and any manifestation or specialist coating. The approved glazing shall thereafter be installed and retained in accordance with the approved details.

This would allow the Council to control the precise appearance and environmental performance of the glazing without preventing a design approach that better preserves the open character of the former cowshed.

8. The open bay at one end

This area encourages birds to fly in and nest. To avoid the unsightly mess the options are to close off the roof or use a net. There is no room for parking and the space is redundant. If the connection between column and truss is hidden, this again is not a minor issue. The connections are awkward and would look clumsy if exposed, so to leave the bay open is yet another compromise which is contrary to the effort and cost gone into to preserving the original form of this historic building.

It will encourage more birdstrikes which is the opposite to the Conservation officers approach to reducing mortality.

9. Conclusion

The applicant respectfully submits that the officer's objection gives insufficient weight to the specific nature of this building as an open-sided cowshed and to the fact that the stone piers have been reconstructed from collapsed original material. The proposed amendment is not an attempt to impose an unrelated modern facade. It is a considered response intended to retain the simplicity, openness and bay rhythm of the former agricultural structure.

The proposed full-height glazing, if controlled by condition, would:

- preserve the open-fronted character of the cowshed;
- retain the visual rhythm of the reconstructed stone piers;
- avoid the awkward eaves/truss compromise created by the approved scheme;
- provide a cleaner and more legible architectural solution;
- avoid unnecessary domestic-style infill;
- allow bird-strike and reflectivity concerns to be addressed by specification.

For those reasons, the applicant respectfully requests that the objection be reconsidered and that the amendment be supported, subject to appropriate glazing-detail and bird-safe-glass conditions.

CR 21/05/2025