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Heritage, Listed Buildings and Conservation Area Consultancy

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cc: Pippa Card, Conservation Officer, Wiltshire Council

Date: 12 May 2026
Our ref: HPS675/26
LPA ref: PL/2026/01248

Application address: Ash Tree Cottage, Easton Royal, SN9 5LZ

Dear Ms Sanger,

Re: Ash Tree Cottage, Easton Royal, SN9 5LZ – Response to Conservation Officer's Comments (Pippa Card, 14 April 2026)

We write on behalf of our client, the applicant, in response to the Conservation Officer's comments dated 14 April 2026. We have considered those comments carefully and set out below our response to each of the five points raised. We also address the public-benefit balance that the NPPF paragraph 215 test requires and which the Conservation Officer's comments do not engage with.

We note at the outset that the application has been amended since the Conservation Officer's comments were submitted. The ancillary annexe has been formally withdrawn from the application. Updated drawings (03A and 04A, issued 23 April 2026) reflect this withdrawal and also show the garage roof in natural slate, in accordance with the Conservation Officer's suggestion. Those two matters are therefore resolved, and the following response addresses the four remaining elements of the scheme.

1. Loss of Thatch – Rear Thatched Extension

The Conservation Officer's position

The Conservation Officer considers that replacing the thatch on the modern rear extension with natural slate causes visual harm to the listed building, on the grounds that the existing thatch creates "harmony" with the historic cottage and that slate cannot achieve the correct detailing around the eyebrow dormer.

Our response

The Conservation Officer's concern about harmony between the two roof coverings is understandable in the abstract, but it does not withstand scrutiny when the correct policy test is applied.

The starting point is that the rear range is a modern extension, as the Conservation Officer herself acknowledges. It is not historic fabric. One of the established principles of modern conservation practice – expressed in Historic England's Conservation Principles (2008) and their 2013 advice on extending listed buildings – is that new work should be clearly readable

as new and clearly distinguished from the genuine historic fabric it sits against. Historic England's own guidance states that an addition should be 'clearly read as different to the old house.' That principle is not confined to the 2013 document: Historic England's Advice Note 2, Making Changes to Heritage Assets (HEAN 2, December 2025), confirms at paragraph 41 that the proper considerations for additions include their relationship with the original asset and that new work should not dominate it – a framework that presupposes additions should be distinguishable from, rather than imitative of, the historic fabric they sit against.

The existing thatched rear range does the opposite: it dresses a twentieth-century structure in the same material as the historic core, obscuring the distinction between genuine historic fabric and later work. That is not a heritage value worth preserving.

The "harmony" the Conservation Officer is defending is therefore a harmony that blurs the reading of the listed building. Removing that false harmony and introducing a material – natural slate – that is honestly differentiated from the historic thatch is precisely what modern conservation guidance calls for. Historic England's 2013 guidance specifically endorses "cleverly chosen contrasting materials in a modern design" where "the extension can then be clearly read as different to the old house."

The removal of the rear extension's thatch and its replacement with natural slate therefore constitutes a positive heritage intervention in its own right. It better reveals the significance of the historic thatched core (NPPF paragraph 219), restores a clear architectural distinction between genuine historic fabric and later work, and allows the cottage to read as what it actually is – a modest vernacular historic dwelling – rather than being visually extended by a twentieth-century imitation of itself.

On the specific question of eyebrow dormer detailing, we note that the architect is preparing a detailed construction section drawing which will demonstrate that the proposed eyebrow dormer can be satisfactorily detailed in natural slate. We respectfully invite the Conservation Officer to review that technical drawing before maintaining her objection on this point.

There is also compelling technical evidence that the existing thatch on the rear range dormer is itself deficient, which bears directly on this point. A letter dated 11 May 2026 from Jonathan Foster of L.C. Foster & Sons, Master Thatchers (established 1889), submitted with this response as Appendix 1, confirms that the pitch of the existing dormer window on the rear elevation is too shallow for thatch to function correctly. For thatch to shed water effectively a minimum pitch of 42 degrees to the horizontal is required; the existing dormer falls below this threshold. The practical consequence is that the thatch in this location cannot perform its primary weatherproofing function, leading to accelerated deterioration of the thatch material.

This is significant in two respects. First, it undermines the Conservation Officer's position that the existing thatched situation should be preserved: the existing dormer thatch is not performing satisfactorily and is not a condition worth retaining. Second, it forecloses the Conservation Officer's implied alternative – that the dormer might be redesigned to a steeper pitch to accommodate thatch. That option was considered and not supported at pre-application stage (ENQ/2024/01039, 23 January 2025), where the Conservation Officer instead indicated that an eyebrow-style dormer would be more appropriate. The proposed eyebrow dormer in natural slate is a direct and considered response to that pre-application guidance. Natural slate is not, therefore, an arbitrary material preference: it is the only technically viable and procedurally consistent solution for this element of the scheme, confirmed by expert thatching advice from a practitioner with over 130 years of family experience in the craft.

On the honest assessment of harm: our Heritage Impact Assessment acknowledges a degree of less-than-substantial harm arising from the change of roof covering on the rear range. That harm is, however, modest in degree and must be weighed against the public benefits set out

in Section 5 below. The Conservation Officer's comments do not engage with that balancing exercise.

2. Replacement of the Flat-Roofed Extension with a Pitched Roof

The Conservation Officer's position

The Conservation Officer accepts that the existing flat-roofed extension is "not particularly sympathetic" but argues that it is at least visually subservient. She considers that a pitched replacement would become more visually prominent and compete with the historic cottage.

Our response

With respect, the Conservation Officer's position on this element is not supported by the drawings or by national guidance, and the policy test she applies – "subservience" – does not protect poor-quality design.

First, on the drawings: the proposed pitched roof has been deliberately designed with a lowered ridge that sits visibly below the ridge of the historic thatched core. This is not a matter of interpretation – it is a measurable fact shown on the proposed west elevation (Drawing 03A). The new form is, by design, subordinate to the historic cottage. The Conservation Officer's concern that it will "compete" with the historic building is simply not borne out by the drawings.

Second, on policy: Historic England's 2013 guidance, *I Want to Extend My House*, states in terms that a new extension 'should not dominate a historic building' (which we achieve through the lowered ridge) and that 'it may be possible to replace a poorly built and designed extension with a new structure.' That is precisely what is proposed. This principle is reinforced by HEAN 2 (December 2025), which confirms at paragraph 27 that the removal of later layers of work is acceptable where they are not of significance in themselves and where their removal would result in an enhancement to the significance of the building that outweighs the loss of the later addition. The 1970s flat-roofed extension plainly meets that test: the Conservation Officer herself accepts it is unsympathetic, it has no special architectural or historic interest, and its replacement with a better-detailed form delivers a net heritage improvement. The scheme lines up squarely with Historic England's own guidance; the Conservation Officer's position, in effect, is that a poor-quality 1970s addition should be retained because at least it sits low. That is not the national policy test.

Third: the Conservation Officer accepts that the flat roof is unsympathetic. Something unsympathetic is, by definition, a detractor from the significance of the listed building. Removing it and replacing it with a form that is subordinate (by reason of the lowered ridge) and more sympathetically detailed represents a net heritage improvement. NPPF paragraph 219 – which requires decision-makers to take opportunities to enhance or better reveal the significance of heritage assets – applies directly.

There are also material considerations of amenity and energy performance. The existing flat-roofed bedroom is dark, low-ceilinged and thermally poor. NPPF paragraph 135 requires new development to provide a high standard of amenity for existing and future users – a test the current room does not meet. The replacement pitched roof will also enable the thermal performance of this part of the dwelling to be substantially improved, delivering insulation standards that the 1970s flat roof construction cannot achieve. This supports the NPPF's climate objectives (Chapter 14) and Wiltshire Council's climate-emergency declaration. A refusal of this element entrenches a thermally deficient structure with no realistic route to improvement.

3. South-Facing Oak-Framed Extension

The Conservation Officer's position

The Conservation Officer characterises the proposed single-storey oak-framed rear extension as “overdevelopment” of the site, arguing that the building has already been extended to “the maximum that retains its original character,” and that a further extension causes harm through cumulative impact.

Our response

We consider this to be the weakest of the Conservation Officer's five objections, for three reasons.

First, “extended to the maximum” is not a policy standard. It is an impression rather than a test, and it is not a threshold found in the NPPF, Wiltshire Core Strategy Core Policy 58, or Historic England guidance. Historic England's own 2013 guidance on the subject states expressly: ‘There is no rule on the ideal percentage increase in size: it all depends on the size, character and setting of your house.’ HEAN 2 (December 2025) is consistent with this: paragraph 41 sets out the proper considerations for additions to heritage assets – proportion, height, massing, bulk, use of materials, relationship with adjacent assets and setting – and makes clear that new work should not dominate the original asset. It does not endorse any volumetric ceiling or threshold of the kind the Conservation Officer has implied. By giving her assertion the language of a policy threshold, the Conservation Officer has created a test that has no basis in the applicable policy framework. The correct test is a proportionate assessment of character, setting and significance.

Second, the proposed increase is genuinely modest. The architect's volumetric analysis demonstrates an existing volume of 179m³ against a proposed volume of 210m³ – an increase of 31m³, or 17%. That figure encompasses all proposed changes, including the pitched-roof replacement on the north elevation; the south extension on its own represents a smaller proportion still. A 17% overall increase on a cottage of this size, achieved through well-designed and subordinate additions, is a measured and calibrated enlargement. Decision-makers routinely approve larger percentage additions to listed buildings where the design is well-handled.

Third, the proposed extension is located precisely where Historic England says extensions are best placed. Their 2013 guidance is explicit: “an extension will usually have less effect on your historic house if it is built onto the back and not seen from the front.” The oak-framed extension is on the rear garden elevation. The design itself is single-storey, with a lead flat roof that sits below the eaves line of the historic cottage. It reads clearly as a contemporary addition – honestly expressed, subordinate in scale, and distinguished from the historic fabric.

On the cumulative argument: the Conservation Officer treats the existing twentieth-century extensions as establishing a baseline of harm to which this scheme adds. But the scheme does not simply add to those earlier changes – it remediates them. The 1970s flat-roofed extension is being replaced with a better-detailed pitched form; the 1930s rear range is being re-roofed in a material that clearly distinguishes it from the historic core. The cumulative story is not “another extension piled on top of previous ones” but “twentieth-century interventions improved, with a single modest well-designed element added to the rear.” Read correctly, the net cumulative effect is one of improvement, not further erosion.

We acknowledge, as our Heritage Impact Assessment does openly, that the south extension gives rise to a degree of less-than-substantial harm. Heritage practice requires that honesty. However, what matters under NPPF paragraph 215 is that less-than-substantial harm must be weighed against the public benefits of the proposal. The Conservation Officer has not carried out that balancing exercise. She has asserted harm without characterising its level and has not acknowledged the benefits that sit on the other side of the scale. That is a material procedural weakness which the formal decision must address.

4. Garage

The Conservation Officer accepted the principle of the replacement garage and suggested that natural slate be used for the roof covering rather than plain clay tiles. The application has been amended accordingly: Drawing 04A (issued 23 April 2026) shows the garage roof in natural slate. This point is therefore agreed and resolved.

5. The Public-Benefit Case – NPPF Paragraph 215

Running across all three retained elements of the scheme is a single overarching argument that the Conservation Officer's comments do not engage with: the paragraph 215 balancing exercise. Any residual less-than-substantial harm must be weighed against the public benefits of the proposal. We invite the case officer to carry out that exercise, and we set out the public benefits below.

- Optimum viable use: the scheme secures the continued and sustained use of Ash Tree Cottage as a family home – the most straightforward optimum viable use for a Grade II listed cottage of this character. HEAG304 paragraph 18 identifies this as a recognised heritage benefit, and NPPF paragraph 210(a) imposes the same test.
- Removal of intrusive twentieth-century fabric: the 1970s flat-roofed bedroom extension and the modern chimney on the rear range currently detract from the asset's significance. Their removal is a clear heritage benefit, directly engaging NPPF paragraph 219.
- Improved amenity: the current north bedroom is dark, low-ceilinged and thermally deficient. Replacing it with a properly proportioned and detailed space delivers a real improvement in living standards and supports the long-term viable occupation of the listed cottage. NPPF paragraph 135 is directly engaged.
- Energy efficiency and climate objectives: the existing historic fabric cannot be meaningfully insulated without compromising its significance. The new-build elements proposed – the replacement pitched roof, the oak-framed south extension, and the replacement garage – can be built to full Part L standards, delivering a substantial improvement in the overall thermal performance of the dwelling. This reduces running costs and carbon emissions over the life of the building, directly supports NPPF Chapter 14, and aligns with Wiltshire Council's own climate-emergency declaration. A refusal of the new-build elements does not preserve the status quo; it entrenches a thermally inefficient building with no lawful route to improvement.
- High-quality contemporary architecture: the new elements are honestly expressed, subordinate to the historic cottage, and deliver a positive contribution to local character and distinctiveness – a benefit expressly recognised in NPPF Section 16.

Taken together, these are substantial and cumulative public benefits. They are precisely the kind of benefits the NPPF paragraph 215 balancing exercise is designed to weigh against residual less-than-substantial harm. We respectfully submit that when that balance is properly struck, it falls clearly in favour of the proposal.

6. Conclusion

We respectfully submit that the Conservation Officer's objections to the three retained elements of the scheme are either not supported by the drawings, not anchored in the applicable policy framework, or fail to engage with the public-benefit balance that national policy requires. We invite the case officer to grant listed building consent for the application as amended.

We would welcome the opportunity to discuss these points further, and are happy to arrange a meeting with the case officer and Conservation Officer if that would be helpful. Please do not hesitate to contact me directly.

Yours sincerely,

Sam Driscoll

Director

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Ash Tree Cottage
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11th May 2026

To whom it may concern.

Regarding the existing window on the rear elevation. The pitch of this window is not suitable for thatch as the angle of the above it too shallow. For thatch to shed water off properly the pitch needs to be at a minimum of 42 degrees to the horizontal.

Jonathan Foster.