

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/02543 & PL/2026/01400
Insertion of a new rear window, enlargement of existing window, installation of glazing behind retained barn doors, internal works to improve functionality.
Address

Please find following comments in respect of the above application(s).

Recommendations:

☐	No comment
☒	Support in principle subject to amendments to the scheme (as set out below)
☐	Support subject to conditions (as set out below)
☐	Object (for reasons set out below)
☐	No objections

Scope of comments: the following comments relate to the built historic environment.

National Policy and guidance: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Sections 16 (LBC) and 66 (PP) require that **special regard** be given to the desirability of preserving or listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development. Paragraphs 214-16 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Chapter 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already

benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Historic England’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”. Additional guidance is also contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)

The following points are taken from the Historic England document “The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

“The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset.”

“The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part...”

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

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

Other HE publications

HE GPAs and HEANs [The Planning System | Historic England](#)

Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency provides specific advice relevant to development of this nature.

Local Policy: The Council’s Core Strategy Policy CP58 ‘Ensuring the conservation of the historic environment’ requires that “designated heritage assets and their settings will be conserved, and where appropriate enhanced, in a manner appropriate to their significance.” It is also required that distinctive elements of Wiltshire’s historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

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.

Proposal: Insertion of a new rear window, enlargement of existing window, installation of glazing behind retained barn doors, internal works to improve functionality.

Relevant planning history:

K/86/0538 - Change of use of barn to residential (Granny Annexe) – Approved with conditions

K/38597/L - Alterations to convert part of barn to tack room, bathroom and study. – Approved with Conditions.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance.

In this case, whilst the applications are accompanied by a “Heritage Statement” the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, 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.

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.

In this case the significance of the building lies largely with its historic fabric and vernacular architecture - its form, layout and vernacular materials which have significant aesthetic and architectural interest, and which contribute to the character of the conservation area.

The main house has been subject to several large extensions, creating a large, substantial dwelling, and following a fire in 2016, the dwelling was demolished and rebuilt. Within the curtilage, and visible from the public realm is the barn which is the subject of this application. As the main house is still listed, the barn is curtilage listed.

The 1840 Tithe map show a small, square building in a similar location to the barn, with a small cottage by the road frontage. The more accurate 1st edition OS map shows the complex, with the main house (now ‘L’ shaped) and a complex of outbuildings, including the current barn. Chirton Cottage is now a large dwelling, the barn is small and can be clearly identified as a small barn within a former village farmstead. Village farmsteads are of high significance, as identified within the Wiltshire Farmstead Guidance ([The Wiltshire and Swindon Farmsteads Guidance - Wiltshire and Swindon History Centre](#)) This raises the significance of the barn, particularly as the main house has been rebuilt.

The barn is thatched and formed of three bays, with large, double doors within the central bay. Externally the barn is clad with weather boarding (unstained). Internally one bay has had a modern ‘pod’ inserted which sits on the concrete floor. It is unclear when this was inserted as the approved plans (K/38597/L) show this as an open bay to be used as store. The other bay has a two-storey ‘pod’ (the approved plans show this as a two-storey element, with tuck & feed & bathroom to the ground floor and study above) which has modern windows in the gable end, inserted following approved scheme (K/38597/L). This houses a kitchen to the ground floor and a bathroom to the upper floor. The pods appear to be constructed to allow

for thermal efficiency and are finished in modern materials. The roof structure (raking Queen post) and staggered purlins were used in construction between late-1500s - 1800s, but the structure is likely to date towards the end of this period. The Corner House, which formed part of the same complex has been dated to early C19 and Chirton Cottage was dated to C18.

Assessment: The proposed scheme looks for the 'insertion of a new rear window, enlargement of existing window, installation of glazing behind retained barn doors, internal works to improve functionality' (LBC Proposal). However, due to the existing fairly open nature of the barn, the proposed scheme is for a more comprehensive conversion, infilling the existing cart openings with glazing, and inserting first floor to the SE bay, to create a bedroom, ensuite and dressing area. This will have an 'open' edge, using the using truss to form a balustrade. To the ground floor, a new, large window will be inserted to the NE elevation, and the kitchen will be relocated to sit under the new mezzanine bedroom. To allow this, it will require the loss of the modern pod.

The loss of the pod is supported as this is considered to cause harm (at low level) to the significance of the building. The insertion of the additional floor or the staircase is not detailed, as would be expected in an application of this type, as connecting to the historic timber structure would not be supported. This has the potential to cause harm to the historic fabric by placing additional loading onto the timber frame.

There are no details of how the thermal up-grading will be undertaken. The use of foiled backed insulation and modern plaster boards, etc would not be supported, and it would be expected that the timber frame (at least in part) is exposed. It is unclear why there is a requirement to up-grade the thermal efficiency of the roof structure which is thatch. Whilst exposed thatch can present a risk, a more minimal intervention could be undertaken. This would also protect the fabric and the head height in the space.

There are no details of the proposed services, in particular the addition of a second bathroom which would introduce a further SVP. It has not been demonstrated that there is a need for the insertion of an ensuite in addition to the existing shower room. There is no information of the proposed extract to the kitchen or the bathroom. The creation of steam can have a negative impact on timber frames, especially where they have had natural ventilation, and therefore the combination of modern insulation/ materials and additional steam can have a long-term negative impact of the historic fabric.

The insertion of the windows would appear to result in the cutting of the timber frame. This would not be supported, especially following the loss of the main house. During the site visit, it was discussed that the timber frame could remain uncut, but a careful detailing of the window frame could be undertaken so that the frame sits in front of the timber frame. The same principle would be required of the proposed enlarging of the existing windows. The creation of windows in former agricultural buildings creates a domestic appearance and therefore causes harm to the significance of the listed building. The insertion of the large, glazed doors would provide light to the proposed new bedroom and open space, but it is accepted that the ground floor kitchen would struggle for natural light. It is unclear why the proposed 'store' requires large windows for natural light. Creating four large windows in this elevation is deemed to cause some harm due to the domestication of the elevation. It has not been clearly demonstrated why the windows within this elevation need to be increased in size.

The further sub-division to create the additional spaces, such as the ensuite and dresser, has not been clearly demonstrated that it is required, and it is recommended that these elements are removed to allow the openness of the barn to be understood.

The historic use of the building as a barn is recognised as being redundant. Due to the scale and position of the barn, it is unlikely that an alternative use, apart from storage could be found. Whilst the works will result in some harm, with some amendments, they are balanced and considered (dependant on details) and therefore offer a viable use for the building.

The proposed principle is considered to be acceptable; however, the cutting of the timber frame is not acceptable as this would cause harm through loss of fabric and the additional sub-division of the space would cause harm to the significance of the simple agricultural building. However, due to the limited information and justification, if the scheme were to be approved, a number of conditions would be required to ensure the protection of the building and its significance. These should be pre-commencement conditions.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The proposals will result in harm to the building via the loss of character and via change to its layout and original external form. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of important structural historic fabric and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case there is limited justification that the works will result in any public benefit through the retention of the building in a viable use. As a result, the proposals would meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.

Conditions

WL1 FURTHER DETAILS REQUIRED

Notwithstanding the approved drawings, no works shall commence until details of the following matters have been submitted to and approved in writing by the Local Planning Authority:

- (i) Large scale details of all external joinery including metal-framed glazing (1:5 elevation, 1:2 section) including vertical and horizontal cross-sections through openings to show the positions of joinery within openings, depth of reveal, heads, sills and lintels;
- (ii) Large scale details of all internal joinery (1:5 elevation, 1:2 section);
- ~~(iii) Full details of proposed rooflights, which shall be set in plane with the roof covering;~~
- (iv) Full details of external flues, background and mechanical ventilation, soil/vent pipes and their exits to the open air;
- (v) Full details of proposed meter and alarm boxes;
- ~~(vi) Large scale details of proposed eaves and verges (1:5 section);~~
- (vii) Full details of proposed internal service routes;
- (viii) A full schedule and specification of repairs including:
- (ix) a structural engineer's report setting out the nature of, and suggested remedial work to, structural defects
- ~~(x) proposed timber and damp proof treatment~~
- (xi) proposed method of cleaning/paint removal from historic fabric
- (xii) a full schedule of internal finishes to walls, ceilings and floors
- (xiii) Full details of external repairs and re-covering of weatherboarding joinery and metalwork; and
- (xiv) Full details and samples of external materials.
- XV) details of how the proposed new first floor and staircase are to be inserted
- XVI) details of the proposed floor make-up, including insulation

The works shall be carried out in accordance with the approved details.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

WL15 RETAIN ROOF-TIMBER FRAME

The existing roof-timber frame shall be retained, uncut and unaltered in situ as part of the approved scheme.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

POLICY-[number & purpose]

WL16 FIRE & SOUNDPROOFING/INSULATION DETAILS & IMPLEMENTATION

No works shall commence on site until details of the methods of fire protection, sound proofing and insulation for the walls, floors, ceilings and doors, including 1:5 sections through walls and ceilings, ~~1:20 elevations of doors and 1:1 scale moulding sections~~ have been submitted to and approved in writing by the Local Planning Authority. All existing original doors shall be retained and where they are required to be upgraded a schedule and specification of works shall be submitted to and approved in writing by the Local Planning Authority. Self-closing mechanisms, if required, shall be of the concealed mortice type. The works of fire protection, sound proofing and insulation shall be carried out in accordance with the approved details.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

POLICY-[number & purpose]