

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/03553
Change of Use from ancillary staff accommodation to a commercial Class C5 (Short-Term Let) use.
Smithwick Farm, The Common, Rowde, Devizes, SN10 1TA

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.

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

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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](#)

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.”

Proposal: The proposed scheme is for a change of use from ancillary use for staff to short term let.

Relevant planning history: K/52089/LBC - Conversion of single storey detached building to staff accommodation; K/52046/F - Conversion of single storey detached farm building to ancillary staff accommodation

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

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 application is accompanied by a “Supporting 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 architecture as a former agricultural building associated with the Grade II listed Smithwick Farmhouse, which is dated to the late C17, and extended and altered in the c.1900. The building subject to this application has been considered to be curtilage listed due to the association with the farmhouse.

The building has already been subject to conversion to residential use, and this is an application for change of use from ancillary for staff to short term let.

Assessment: The proposed application is for a change of use to allow for short term holiday let (C5). The principle and use of the building for residential use have been established. The advantage from a heritage consideration of restricting use to an ancillary function is the potential for shared services, which reduces the domestic clutter, such as bins, sheds, etc., and no requirement for boundary treatments to form private amenity space or separate parking spaces. The creation of these has the potential to cause harm to the setting of the listed buildings if not carefully considered as they introduce a domestic appearance to a rural, agricultural setting.

The proposed change of use is to C5 Holiday Let would, in principle, allow for a permitted development right (PDR) to become a C3 Class (standard residential home) without planning permission. However, as the building is considered listed, this protection removes PDRs, and therefore full planning would be required for a change of use to C3. This would allow some consideration to protect the setting of the listed buildings.

The principle of a C5 Holiday Let use is acceptable as there is no requirement for additional facilities that would be expected in a standard home (C3).

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 impact of the proposals on heritage assets will be neutral. On this basis no specific justification is required however it is considered the works will assist in securing the future use of a heritage asset in support of its long-term conservation. The requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.

Recommended Informative:

As the building is a Curtilage Listed Building, there are no permitted development rights, and therefore the use cannot be amended without planning permission to a C3 use.