Wiltshire Council

Wiltshire Council Planning Consultation Response

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Wiltshire Council Conservation (Central)

Officer's Name: Isobella Wise
Officer's Title: Senior Planning Officer

Application No: **PL/2026/02966**
Outline planning application for the erection of up to 275 dwellings (including affordable housing), associated infrastructure, landscape and biodiversity enhancements, with all matters reserved except for the main access from Sandridge Common
Blackmore Farm, Sandridge, Melksham

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)
X	Object (for reasons set out below)
	No objections

Scope of comments: The following comments relate to the conservation of the built historic environment. Other issues, such as those relating to the impact on the wider landscape in general and to below ground archaeological deposits will be subject to consideration by other colleagues within the Council whose specific disciplines relate more closely to these issues.

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. Section 66 (PP) requires that **special regard** be given to the desirability of preserving or enhancing 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.

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.

Additional advice is provided within the Historic England document "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) which notes that "The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance."

Proposal: the application follows a previous application for up to 500 dwellings plus employment uses and a school on land to the west and south-west of the current site. It seeks consent for a further 275 dwellings accessed from a second access from the A3102 to the east of the Blackmore Farm access.

Site: the site comprises a large area of agricultural land to the east of Melksham. The fields lie to the south of the A3102 Sandridge Common Road which leads eastwards towards the pronounced ridge occupied by the Sandridge Park estate. The land is level and generally open and any development will be prominent within its surroundings, including when travelling along the main road in either direction, in longer views from the higher land to the east and from the footpaths to the east and west of the site.

To the north-west of the site, Blackmore Farmhouse is a grade II listed building. In combination with the neighbouring approval, the site would wrap around the farmhouse to the east, south and west. Whilst the construction area is not included within a designated conservation area and contains no major standing heritage, the site forms part of the wider agricultural setting to Blackmore Farm and several other farmsteads. To the east, the land rises to the Sandridge where the grade II listed Sandridge Park and Tower are located.

Relevant planning history: PL/2023/01949 - outline permission for up to 500 dwellings plus employment uses and a school to the west and south-west of the current site.

ENQ/2025/02104: pre-application enquiry in respect of the current proposals.

Issues: in this case the key issues lie with the impact from the additional development area on the setting of the grade II listed Blackmore Farm.

I have also previously noted that consideration should also be given to any impact (via development within their setting) on assets to the east on rising land of Sandridge including the Sandridge Park Estate and Sandridge Tower. Consideration is given to the potential for impact on Tanhouse Farm, which lies within the Study Area (a 1km radius) set out within the Archaeological and Heritage Assessment which accompanies the application and this is dismissed on the grounds of limited intervisibility, distance and lack of function or historic connection. The listed Old Coach House at Sandridge Park is also included within the Study Area, with the report concluding that there is no intervisibility or known historic or functional link between the site and this property. With Tanhouse Farm, it is therefore discounted from further discussion. This is considered reasonable. Taking into account that Sandridge Tower is a folly constructed in association with Sandridge Park within deep woodland to the south of the road, I am content to assume that the same will apply.

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, the application is accompanied by an Archaeological and Heritage Assessment which identifies the designated assets affected and assesses the impact of the proposals. The requirements of the NPPF are therefore met in this respect. Paragraph 208 also provides for the local planning authority to make its own assessment of impact.

Significance of assets and contribution of setting (as appropriate): 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 I agree with the Archaeological and Heritage Assessment which concludes that the significance of the building lies largely with its historic interest, including its fabric, its form, layout and vernacular design and materials and from the contribution it makes to the understanding and experience of the historic agricultural landscape surrounding Melksham. I also agree with the Assessment that the surrounding land which farms the site has a historic and functional connection with the house that contributes to its significance and its understanding as a farmstead within the rural landscape.

Assessment: In combination with the previously approved development to the west, the proposals would introduce a suburban form of development which is out of character with the existing agricultural landscape, over a very large area, and would result in the loss of a substantial part of the wider rural setting within which the listed farmhouse is experienced and a consequent diminution of its significance.

It is acknowledged that there has been some erosion of the immediate setting of the house via the loss of much of the historic farmstead and by the construction of the adjacent bungalow, which is out of character in this historic context. Further erosion will occur as a result of the approved development granted in outline under PL/2023/01949, the loss of the area to the south-west if anything increasing the value of this remaining area of open land in contributing to the understanding and experience of a farmstead set within its historic agricultural holding.

Some mitigation is proposed to be provided via the specification of areas of orchard planting and green space to the east of the farmhouse and notes that these will retain hedges and trees. However, the modest size and slightly contrived shape of the area, its situation between developed areas and the new entrance roads to the development which run through it mean that it will have a very different character to the previous agricultural landscape and is unlikely to preserve the character of the farmstead's historic setting. The additional vehicular access to serve the development will also lead to the further suburbanisation and erosion of the rural character of the main road.

The NPPG is clear that when assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. In commenting on the application on the neighbouring site I noted that "the omission of built form from the area to the east of the farm does constitute an improvement and allows the farm to retain something of its connection with the surrounding agricultural landscape." The reintroduction of the area now proposed would obviously reverse this view and, in combination with the approved site to the west, the proposals would introduce a suburban form of development which is out of character with the existing agricultural landscape, over a very large area, and would result in the loss of a substantial part of the wider rural setting within which the listed farmhouse is experienced and a consequent diminution of its significance. The impact of the development on the wider agricultural landscape which forms the setting of the farmstead would be particularly appreciated in approaching the site from the north along the main road, when the farm would become surrounded by and viewed against a new backdrop of suburban housing development in place of the

current agricultural character of the landscape. Given that there would be no direct impact on historic fabric, the harm can be taken as “less than substantial harm” for the purposes of interpreting the NPFF.

No heritage benefits are argued or will result from the proposals.

Summary & conclusion: the proposed development would result in harm to the setting and significance of the grade II listed Blackmore Farmhouse. Taking into account the **special regard** required by Section 66 of the Act to be given to the desirability of preserving the setting of listed buildings and the **great weight** ascribed to the conservation of designated assets by paragraph 212 of the NPPF it is clear that the proposals should be subject to a high level of scrutiny.

Paragraph 214 of the NPPF requires that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal” (nb these may include but are not limited to heritage benefits). Paragraph 208 of the NPPF also requires that local authorities take opportunities to avoid or minimise conflict with heritage objectives.

The proposals are also at odds with the requirements of Core Policies 57 and 58.

From the viewpoint of the built historic environment alone there are no heritage benefits which will outweigh the harm caused to the historic environment and I must therefore object to an application.

In due course it will fall to the Case Officer to assess the benefits which will accrue and to weigh these against the heritage harm which will be caused and any other planning constraints and to reach a view on the final planning balance. During this process close scrutiny will need to be given to the level and nature of the need and the opportunities for providing the public benefits which would be delivered either in other ways or on other sites which would have a lesser adverse impact.