

6th July 2026

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Dear Samantha Stockley,

**Re: PL/2026/O3735 – Permission in Principle for the erection of up to three dwellings
(amendment to PL/2025/O8695)**

Pegasus Group have been instructed by owners of Home Farm, Sherston to review and comment on the above application. We are experienced Built Heritage Consultants, and this letter has been written and reviewed by full members of the Institute for Historic Building Conservation (IHBC), who have advised on numerous projects involving development within sensitive locations, including those in close proximity to highly designated heritage assets.

A previous scheme for the development of the site was refused under application reference PL/2025/O8695, with the following reason for refusal relating to heritage, which stated:

"The proposed development would harm the setting of Praters Farmhouse and its associated Threshing Barn (both Grade II listed) by introducing suburban built form into an open field that currently contributes to their historic farmstead character and rural context. This change would erode the legibility and significance of these heritage assets, contrary to the statutory duty under Sections 16 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990 to give special regard to preserving listed buildings and their settings. The harm has not been clearly or convincingly justified and conflicts with Chapter 16 of the National Planning Policy Framework (paragraphs 208, 210, 212, and 213), which require great weight to be given to the conservation of heritage assets and for any harm to be

justified, as well as Core Strategy Policies CP57 and CP58, which seek high-quality design and the conservation of the historic environment."

We note that the revised submission has been accompanied by a Heritage Statement prepared by Asset Heritage Consulting, and this letter directly responds to the statements within that Report.

Grade II Listed Buildings at Prater's Farm

The application site forms part of the land associated with Prater's Farm, which comprises two Grade II Listed Buildings. Tithe records from 1839 suggest a link in ownership and occupancy between the application site and the Listed barn on the site historically, but over time, this connection extended to the Listed farmhouse as well. The site was therefore historically functionally associated with the Listed Buildings, as well as forming part of their immediate rural surrounds. Whilst intervisibility may be limited between the site and these Listed Buildings, the verdancy and tranquillity of the plot can be appreciated.

The submitted Heritage Statement notes the mature vegetation on the boundary between the application site and the Listed farmstead. It states:

"3.18 These boundaries provide a clear sense of separation between the site and the immediate grounds of the listed buildings, with little sense of the open character of the site perceived from within the listed farmhouse or its garden. Even views from the upper floors of the listed farmhouse only really take in the site in the form of the heavy planting on its north-eastern boundary. Moreover, from within the site there is little sense of the listed buildings to the north-east and it is rather the domestic buildings along Easton Town (road) to the north-west that are most strongly perceived (plate 5)."

Whilst there may only be filtered intervisibility between the two because of dense vegetation, the rural character of the site as an agricultural field provides a sense of separation between the rural farmstead and the village. It also reinforces the character of the Listed complex as a former farmstead. As confirmed in the Officer's Report of the refused application, the application site "currently contributes to the legibility and character of the historic farm group".

The submitted Heritage Statement does not refute that the field has a historic association with the Listed former farmstead; however, the report states the following:

"3.19 I note the assessment of the Council on the previous application affecting this site (ref. PL/2025/O8695), with the Case Officer identifying harm to Praters Farm and the listed barn through the development of five houses on what they described as, 'the adjacent agricultural field' (p.11 of the Case Officer's report); however, in my view, the site does not currently have the character of an agricultural field, which suggests an arable character."

Rather, it is a grassed area with no obvious access from surrounding fields. It does not have an agricultural character; if anything, its character is closer to parkland.

3.20 As such, the lack of intervisibility aside, its contribution to the one's experience of the listed buildings of Praters Farm as a former farmstead is not, in my view, material. It is an open space set away from the listed buildings, well separated by existing, intervening open space more closely relates to those buildings." (our emphasis)

Regardless of the appearance of the field, the historic and current use is agricultural. This is confirmed in the application form, which states the 'Description and amount of existing use(s) of the site' as "Agricultural Land".

It should also be noted that the boundaries of the field, namely towards the southwest, have modern origins. The application site was sectioned off from the larger field as depicted on historic mapping in 1995. Therefore, the erection of housing on the site would further fragment the wider historic plot.

As with the previously refused scheme, the addition of new dwellings on the site would reduce the open land surrounding the Listed farm complex, in particular land that was historically, functionally associated with the Listed barn at the time of the 1839 Tithe records and which currently and historically contributes to the gap between the farm and Sherston settlement. The associated activity on the site resulting from the proposals would also reduce the tranquillity of the site.

Therefore, the proposals have the potential to result in harm to the significance of the Listed Buildings through a change in setting. The submission has not demonstrated that any configuration of layout or design at the technical details consent stage could sufficiently mitigate the harmful effects. The proposals would permanently erode the separation between the former farmstead and the village as well as fragment the historic parcels associated with the Listed complex.

The proposals would therefore result in a degree of harm to the significance of the Grade II Listed Prater's Farmhouse and Grade II Listed Barn to the South West of Prater's Farmhouse through a change in setting and would not be appropriate for Permission in Principle.

Grade II Listed Buildings at Home Farm

Whilst the Officer's Report of the previously refused scheme did not assess the impacts of the proposals on the significance of the Grade II Listed Home Farm, we still believe that this would be negatively impacted through a change in setting.

Home Farm was historically surrounded by fields and had a rural position, apart from the close proximity of Prater's Farm. There is intervisibility between the Grade II Listed Home Farmhouse

and the application site, as demonstrated in the images below. Whilst some of the existing views include glimpses of the roofscape of Sherston village, it is clear that this is at a distance, and the Listed former farmstead occupies a rural position. The construction of dwellings on the application site with the inevitable associated domestic paraphernalia would further erode the gap between the Listed Buildings and the village, and the discernible rural surrounds of the Listed complex. The submitted Heritage Statement for the application states:

"3.23 The application site is well separated from the listed buildings of Home Farm by distance and boundary planting, while the two were not historically linked by function or ownership. I note that Pegasus Group's objection to application ref.PL/2025/O8695 provides photographs from the upper floors of Home Farmhouse towards the application site. These demonstrate that the application site is not strongly experienced from that listed building except in the form of its thick north-eastern boundary planting."

Whilst intervisibility may be limited, other characteristics of the surrounds, such as the rural character and tranquillity of the site would be affected through the construction of new dwellings and activity. Therefore, the introduction of built form to the application site would result in a degree of harm to the significance of the Grade II Listed Home Farm.

As with Prater's Farm, the proposals should demonstrate the proposals have satisfied Paragraph 212 of the NPPF, which states: *"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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."* Although detailed design would be secured at Technical Detail Consent stage, harm will arise through the principle of developing the plot with dwellings and associated works.



Plate 1: Views from within the Grade II Listed Home Farmhouse looking towards the site (indicated in red).



Plate 2: View from the grounds of Home Farm into the application site.

Sherston Conservation Area

The Delegated Report relating to the previously refused scheme also did not conclude that there would be any impacts on the Conservation Area, but it is our assessment that the significance of the Conservation Area would also still be negatively affected by the proposed development.

The Sherston Conservation Area was designed in 1973. A Statement was prepared and adopted by North Wiltshire District Council in 1999. The application site does not fall within the boundaries of the Conservation Area, but there is intervisibility between the site and the northern boundary of the Conservation Area.

The adopted Conservation Area Statement describes views from the northern boundary, stating:

“Grouped cottages on fringes of village settlement, linearly developed along road. Houses reach the Sherston/Tetbury cross-roads on the north side of Easton Town, but stop short of Praters Farm on the south side, allowing views to open countryside to the south and east.”

As a result of later expansion of the village beyond the Conservation Area boundary, the Statement goes on to state:

“Sherston is fortunate in that expansion has not compromised the historic core of the village around the High Street/Cliff Road. Recent developments

such as Manor Close, beyond Green Lane, and The Tartars and, Easton Square, to the east of Noble Street are cul-de-sac arrangements. Although fundamentally unrelated to the village pattern, they at least do not impinge on it. Care will need to be taken with regard to further expansion, to avoid compromising the open space that is important to the context of the village."
(our emphasis)

Within the view out of the Conservation Area to the north (towards the site), dry stone walls can be seen along Easton Town. The Conservation Area Statement discusses the importance of such walls within the boundary, and views outside of the Conservation Area would similarly contribute positively to the significance of the Conservation Area through setting as a result of the site's undeveloped and agricultural character. It states:

"Within the Conservation Area, the stone and dry-stone boundary and retaining walls play a large part in defining the character of Sherston. There are many fine examples, defining ancient burgage distribution of land and terracing the gradients down to the river crossings to allow level plots. They also form an important setting for the buildings of the village. Their construction shows particularly fine grade materials and workmanship generally with cappings."

The proposed development, despite the reduction in dwelling numbers now proposed compared to the previously refused scheme, would still be appreciable from the Conservation Area boundary, changing the rural character of the view and urbanising currently undeveloped land which forms part of the appreciable rural surrounds of the historic settlement. Furthermore, the alterations to the dry-stone wall to incorporate the new access would also remove a positively-contributing feature from this view. The proposals would thus have the potential to harm the significance of the Conservation Area through a change in setting. Although the setting of Conservation Areas does not have a statutory protection in Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is still considered under the NPPF and any harm justified and balanced against the public benefits of the scheme.



Plate 3: View from within the Conservation Area towards the site (indicated in red, the plot beyond the trees).

Summary

Whilst this objection letter has not provided a full assessment of potential heritage impacts, it has set out the potential for the proposed development to result in harm to the significance of the identified heritage assets.

It is considered that the proposals also do not meet the requirements of adopted local policies.

Core Policy 57 Ensuring high quality design and place shaping of the Wiltshire Core Strategy 2015 states:

“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. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

- i. *enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing*

- pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced
- ii. retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development
- iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting
- iv. being sympathetic to and conserving historic buildings and historic landscapes
- v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy)
- vi. making efficient use of land whilst taking account of the characteristics of the site and the local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area
- vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)
- viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site
- ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network)
- x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials
- xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and space will be used in the immediate and long term future
- xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm
- xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles,

which will underpin the character of the new place xiv. meeting the requirements of Core Policy 61 (Transport and New Development)” (our emphasis).

Core Policy 58 Ensuring the conservation of the historic environment states:

“Development should protect, conserve and where possible enhance the historic environment.

Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:

- i. nationally significant archaeological remains*
- ii. World Heritage Sites within and adjacent to Wiltshire*
- iii. buildings and structures of special architectural or historic interest*
- iv. the special character or appearance of conservation areas*
- v. historic parks and gardens*
- vi. important landscapes, including registered battlefields and townscapes.*

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. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).

Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.”

With respect to Core Policy 57, it is not considered that the proposals will respond positively to the pattern of development or existing townscape and landscape features, namely, the rural character of the site and immediate surrounds. Furthermore, this letter has demonstrated that the proposals will not be sympathetic to the nearby historic buildings, namely the Grade II Listed Praters Farm complex. The proposals will also not satisfy the requirements of Core Policy 58.

Again, whilst it may be possible to secure some of the details of the development by the Technical Detail Consent, the submission has not demonstrated that heritage would not be an overriding constraint to the residential development of the site and would be *“sympathetic to and conserving historic buildings and historic landscapes”* by virtue of the innate harm that would be caused by developing historically open land that was functionally associated with Listed farm buildings and which continues to give legibility to the separation between the historic farm complexes and the village of Sherston.



Overall, the proposals will inevitably alter the character and appearance of the application site by virtue of the change of land use and the amount of development proposed, and heritage harm to the designated heritage assets would arise as a result.

Given the above, we would object to the proposals, and note that they are in conflict with national and local policy relating to the impact of proposals on heritage assets and Permission in Principle should not be granted.

Kind regards,

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Director – Heritage