

Wiltshire Council Planning Consultation Response

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(South/West)

Officer's Name: Russell Brown
Officer's Title: Senior Planning Officer

Application No: PL/2026/02717

Description of works Full planning permission for residential development (Use Class C3) comprising 135 dwellings with associated private amenity space and car/cycle parking, a comprehensive landscaping scheme to include publicly accessible amenity space, sustainable drainage features, new tree planting and associated works. Alterations to the existing Home Farm access from Boreham Road, including demolition of a section of boundary wall, and new vehicular, cycle and pedestrian routes through the site. All associated infrastructure work.

Address: Land at Home Farm, Boreham Road, Warminster

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

Summary

The openness and agricultural character of the site, makes a positive contribution to the setting of Home Farm and Bishopstrow House Hotel – a grade II listed building. As such, I consider its development would have an adverse impact on their settings.

I consider the proposed new access route to the site, would result in an urban form of development which would erode the rural character of the site and which I judge would result in some harm to the setting of Bishopstrow conservation area.

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

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.

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.

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."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "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 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."

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.

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."

Site and assets considered:

The site is a field to the west of Home Farm. Home Farm is accessed via a drive that leads northwards from Boreham Road (the B3414).

Home Farm is not a listed building, however, it does appear on the 1st edition OS map (1844 1888), although not on the Wiltshire tithe map. I consider Home Farm to have some historic interest, particularly in relation to its historic role in relation to Bishopstrow House. As such its appearance and range of former farm buildings, its physical proximity to Bishopstrow House and its agricultural landscape setting are elements contributing to its significance.

In terms of heritage assets, there are a number of designated heritage assets in the vicinity. I have included the list descriptions in an appendix to this consultation response.

Bishopstrow House Hotel is a grade II listed building by John Pinch the Elder of Bath. It is a high-status building and has significant presence in the landscape.

Bishopstrow House garden south of the road Across and under the road, within the ownership of Bishopstrow House Hotel are a series of listed garden buildings/structures that related to the original 'Bishopstrow House' which was demolished and replaced by the existing house. The various buildings/structures, all listed at grade II, are:

- Tunnel Below A36 in the Grounds of Bishopstrow House
- Low wall to road enclosing grounds of Bishopstrow House South of A36
- Summerhouse in grounds of Bishopstrow House
- Garden Walls enclosing orchard in the grounds of Bishopstrow House and the Coach House
- Pump House with boathouse in grounds of Bishopstrow House
- Bridge over river in grounds of Bishopstrow House, south of A36

As such, the interest of the garden is considerable (a composite heritage asset) and perhaps is worthy of RPG designation.

To the west of the site are the following grade II listed buildings: Pavilion to East of Grange Farmhouse and 15 and 17 Grange Lane. 2

And on the main road, to the east of the site is The Cotes: In respect of The Cotes, the list description specifically mentions the wall to the west, linking The Cotes with number 195 Boreham Road. Also listed is the Stable Building to East of No 207.

Whilst the site itself is not in a conservation area, it is just outside the boundary of the Bishopstrow Conservation Area.

In addition, there are a number of non-designated heritage assets (NDHA) within the vicinity, in particular, The Grange, but I also raised the following in my previous response to the outline application:

- Boreham Manor;
- Home Farm;
- Wall (back of pavement) Boreham Road;
- Numbers 209-215 Boreham Road (in particular the Smithy at 215a).

Proposal:

I will restrict my comments to what I perceive to be the potential 'setting' issues, namely:

New access to the site from Boreham Road;
Creation of a park on the southern section of the site.

Relevant planning history:

The site was submitted as part of the 2018 Wiltshire House Site Allocations Plan (WHSAP). The Council commissioned Land Use Consultants to undertake an appraisal of the sites that were considered to have potential to cause harm to heritage assets. In respect of this site (H2.7: East of the Dene), LUC noted a 'risk of harm' to (and I am not covering the archaeological sites in my comments): Bishopstrow House Hotel (at the higher end of the 'less than substantial') and the setting of the Bishopstrow Conservation Area, as well as a potential impact on The Cotes and 196/198 Boreham Road.

Under their heading 'Options for sustainable development' they said: 'Limited development could be accommodated in northwest corner of the site. This, in parallel with strengthening existing landscape structure, would avoid adverse setting change to key heritage assets.'

However, the inspector noted that, in order to provide access to the site there would need to be a new access off Boreham Road. He said:

*'This would include the loss of a significant stretch of an existing high wall that is important to the character of the street and setting of the conservation area. The access road would also need to run through the southern part of the site, **potentially having a detrimental impact on the setting of heritage assets**'.*

ENQ/2025/01241 Pre-application enquiry (pre-cursor to the current application)

In my response to this enquiry I said:

'I consider the development of this site, even the more restricted portion as is now proposed, would cause harm to the setting of the Bishopstrow Conservation Area as a result of the urbanisation of the rural setting of the CA and the coalescence of the two. I consider the proposed access route (splayed opening and road) would cause significant harm to the setting of the Bishopstrow Conservation Area, and harm to the setting of various heritage assets, in particular The Cotes, Bishopstrow House, Home Farm and The Grange.'

Issues: impact on the setting of neighbouring listed buildings, impact on the setting of the Bishopstrow conservation area, impact on the setting of key NDHAs..

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 applications are supported by a Heritage Impact Assessment dated 24 April 2026 which provides sufficient information to understand the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

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.

Lichfields have identified the following built heritage assets to be potentially affected by the proposal:

Bishopstrow Conservation Area
Boreham Road boundary wall (non-designated heritage asset)
Bishopstrow House Hotel (Grade II)
The Cotes and Stables and wall (Grade II)
209-215 Boreham Road (non-designated heritage assets)
15 & 17 Grange Lane (Grade II)
Pavilion to the East of Grange Farmhouse (Grade II)
The Grange (non-designated heritage asset)
Bishopstrow Home Farm (non-designated heritage asset)

I would add the former garden to Bishopstrow House, on the south side of the road. Whilst not an RPG I understand that HE are considering it for designation. Notwithstanding their assessment, I consider it would be a NDHA.

Assessment:

My concerns relate to two elements, namely:

Road access to site from Boreham Road;
Creation of a park on the southern section of the site.

Road access to site from Boreham Road



The current 'road' to Home Farm is a single-track rural lane. As such, its form is in keeping with the character of the former farmyard (now converted to 9 residential units). It is also surmounted by a hedge which contributes to the rural character of the locality, being echoed elsewhere along Boreham Road.

The detailed arrangement is shown on the plan 'proposed site access arrangements' (rev F) by Ardent Engineers. The opening a wide splayed opening onto Boreham Road. As 'viewport 4' annotates 'and wall to be removed/amended' to provide for a splayed opening. A pavement on either side of the opening would be provided.

I note that we do not have a 'proposed Boreham Road' streetscene as we did for the pre-application enquiry. As such, I have copied the previous one here:



Of course it is indicative only and does not show the inevitable: lighting, road signs and road markings.



Site access to Boreham Mead further along the road

The new access will need to meet a number of Highways requirements and as such, the proposed plans can only be indicative at this stage. Even so, I consider the enlarged opening, loss of some of the stone wall, the likely loss of the hedge, and the inevitable need for a splayed opening lined with pavements would erode the rural character of the area, thereby harming the setting of the Bishopstrow CA, The Cotes, Bishopstrow House Hotel and Home Farm (NDHA) in particular.

Creation of a park on the southern section of the site

The current space is an agricultural field (or two fields) with some trees with few features aside from some trees and hedges along the boundaries. As such, it has a clear agricultural character which underscores an appreciation of Home Farm (a NDHA) being formerly a farm, and that this area was historically rural and a farming community.

The proposals essentially landscape the fields and introduce designed parkland features that would erode the 'simple' rural character such as the new access road and pavement, together winding paths (compacted gravel). There also appears to be a play area with childrens' play equipment enclosed by railings and with associated seating and information panels.

The rural character of the space will be significantly altered as a result of the proposals. I consider this will have an adverse impact on the setting of The Cotes, the listed wall, Home Farm (a NDHA), Bishopstrow House Hotel, and the outbuilding to The Grange which is clearly a former agricultural building.

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 setting of a number of designated and undesignated heritage assets via the change in character of the site arising from the implementation of the proposals. The proposals could be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF.

Paragraph 213 of the NPPF says that:

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.