

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/03524
Change of use of building for personal storage and private office/study purposes by the named applicants only, together with external alterations and associated site tidying works
Land Adjacent to Kajha, Millditch, Bratton, Wiltshire, BA13 4SX

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. 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. 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.” 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.

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.”

Proposal: The proposed scheme looks to make minor alterations to the existing building on the site and change of use to personal storage and private office/study (by the named applicants only), and for the ‘associated site tidying works’ which have been described in the cover letter as a ‘Vision’ rather than confirmed works.

Relevant planning history: The site was originally a stable and paddock, and permission was granted for limited use as a personal store. The site has been subject to previous applications such as construction of a bungalow which has been refused due to concerns over domestication of the space.

Issues: impact on the setting of neighbouring listed building (Church of St James GII*), 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, the application was accompanied by a “Cover Letter” which provides a brief summary of significance and comments on the impact of the works. The requirements of the NPPF are considered not to have been 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 (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 the significance of the site is the open nature, which compliments the edge of village location, and provides a green corridor within the valley. The use of the site as a paddock contributed to the rural setting without any formal planting, access tracks, development, etc. The location of the site is within a valley location which has views from the main track leading to the GII* Church of St James, which retains a very rural character, contrasting to the built form within the core of the village.

Assessment: The proposed scheme looks to create a small area for an office with the remaining space used for storage. The proposed elevations look to create new or larger openings, and it has not been demonstrated why the storage space requires additional/ enlarged openings, or an additional door.

The proposed scheme looks to create a WC, but no details have been provided how the services are to be supplied, including how the waste will be dealt with. The addition of these services, whilst understandable as use as an office, increases the permanence of the structure and the longer-term occupation of the building. Piecemeal development or changes can have an accumulative effect on the site, with some of the changes occurring through natural use and function. This increases the longer-term impact on the site, and its contribution to the character of the conservation area.

The proposed change of use to office would result in regular and continuous use throughout the day. Whilst the use as a stables/ paddock would require daily visits, these visits would be for a few hours a day, rather than continuous use. Lighting would be limited, if required during winter mornings or evenings, but with office use, additional lighting would be required.

The use of the site as a paddock would be retain a non-cultivated appearance. The removal of the dumped rubbish and debris is supported, but it is not clear within the submitted application what the ‘associated site tidying works’ are. A ‘vision’ has been created for the site (as detailed within the covering letter), but as noted, it is a vision and therefore would be difficult to control in planning conditions to prevent harm to the character of the conservation area.

The ‘vision’ highlights the removal of the 6ft fences which is supported, but the ‘*various native and non-native species will be planted on the land, to mirror that of the neighbouring property, Kajha*’ raises concerns that this will create a domesticated appearance, rather than a natural landscape through the planting of non-native species and mirroring a domestic garden. The proposed works to the site should be more clearly clarified to ensure that there is no creep of domestic appearance.

As no site plan has been provided, there is no indication of any proposed parking or hardstanding. The submitted information identifies that the owners live in the village, but this does not preclude the option of driving, or other means of transport being used and stored on site. It is accepted that as stables/ paddock, lorries and vehicles would have gained access to the site, but this would be short term only.

Conservation Areas gain their character from a number of qualities, many of which are not because of being domestic, attractive buildings, etc., but can often be formed with their connection with working/ agricultural aspects, or the connection with countryside activities, such as horses. Green views and vistas, relationship of the built form within the topology all contribute to the character of the conservation area. Whilst it has been used as a dumping ground for waste materials/ builders rubbish, the removal of this does not justify any potential permanent harm in the future through the gradual domestication of the site.

In principle, the removal of the fencing, the clearance of the site, and the tidying of the former stable is supported, there are a number of concerns raised by the application in terms of:

- Increase in services
- Increase of activity
- Increase of domestic appearance with non-native planting and creation of a garden appearance
- Further domestication of the building with additional windows in a modern form.

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 have the potential to cause harm to the character of the conservation area by introducing additional plants, and in particular non-native species, and the introduction of permanent services (WC) which would be considered to result in harm to the character of the conservation area. Whilst it is recognised that there some proposed benefits, such as replacement fences, these are not considered to outweigh the potential harm. The proposals could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF. Indeed, the wording of the NPPF and the 'special regard' by Section 72 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 it has not been demonstrated that the works will result in any public benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.