

Wiltshire Council Planning Consultation Response

3rd August 2026

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Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: James Taylor
Officer's Title: Principal Planning Officer

Application No: PL/2026/03545
Outline Planning Application for up to 400 dwellings, local centre, open space and required infrastructure
Land East of Showell Farm, Chippenham

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

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). This guidance 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.”

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.”

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.”

Additional information is contained within the Wiltshire and Swindon Farmsteads Assessment Framework and Character Statement which was carried out as a collaboration between Historic England, Wiltshire Council and the Wiltshire Buildings Record in 2014.

Proposal: the proposals are for the development of the site to provide up to 400 dwellings, a local centre, areas of open space and the required infrastructure. All matters of detail are reserved apart from the access arrangements.

Relevant planning history: PL/2023/04417 previous outline application for development including up to 450 houses (withdrawn).

In addition, the site has been considered extensively during the Wiltshire Local Plan Review process (now withdrawn) for allocation as part of a much wider site. This area was being considered as an employment allocation in accordance with the following concept plan excerpt:



Figure 7. Concept plan for Land South of Chip

Site and assets/issues considered: in this case there are no heritage assets directly impacted within the site itself, and the main impacts are those which will affect the setting of the neighbouring heritage assets. These are identified within the supporting information, including the Heritage Impact Assessment, and their significance is described.

The designated heritage assets considered are:

- Rowden Conservation Area;
- Showell Farmhouse, Grade II (NHLE: 1022145);
- Barn to South East of Showell Farmhouse, Grade II (NHLE: 1198151);
- Granary to South of Showell Farmhouse, Grade II (NHLE: 1363926); and
- Shelter Shed, Showell Farm (HER ref: MWI53876).

The HIA does, however, fail to mention other buildings at Showell Farm (which should be considered as curtilage listed) including the large, covered yard immediately to the north-east, which lies on the roadside. This was an innovative design built for housing cattle in the late C19 and is noted within the Wiltshire and Swindon Farmsteads Character Statement as a rare example of its type:

Significance

- Covered yards, whether as purpose-built wide-span buildings or the covering over of a yard, that pre-date c.1900 are rare in Wiltshire and Swindon. Most recorded examples are in the chalk downland areas.
- Covered yards that form part of coherent planned and model farm complexes of the 1850s to c. 1880, and later examples with architectural quality, are particularly significant.



A late 19th century covered yard building with a typical vented ridge and numerous window openings. Photo © Bob Edwards

Thus, the issues include the impact on the listed farmstead complex including the listed farmhouse, associated listed barn and granary and curtilage listed farm buildings, boundary walls etc. and their setting; the impact on the non-designated outfield shelter shed and yard to east of the road; and the impact on the Rowden conservation area.

The site comprises several agricultural fields under cultivation which lie to the east of the B4528 Chippenham Road and Showell Farm. To the west and north-west beyond the farm an approved employment site is under construction. To the east, the site extends to the banks of the River Avon and, northwards (wrapping around the east side of an existing development) to meet the boundary of the Rowden Conservation Area. The land is largely level with mature hedged boundaries. A significant visual break is formed by a mature hedged boundary following historic fields boundaries, which runs diagonally roughly across the centre of the site on a north-south axis.

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 EIA and relevant documents including:

- Environmental Statement Volume 1 Chapter 9 Cultural and Built Heritage by Montagu Evans
- Heritage Impact Assessment by Montagu Evans
- Details of the development are set out within the Design and Access Statement by EDP.

The Heritage Impact Assessment provides the most detailed consideration of the assets affected and largely provides sufficient information to understand the impact of the proposals. The requirements of the NPPF are therefore met in this respect. In addition, paragraph 208 of the NPPF 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.

The significance of the listed Showell Farmstead lies principally in its historic and architectural interest, reflected in its fabric, form, layout, materials, architectural detailing, and surviving evidence of former agricultural use. It is also important for the insight it provides into the historic agricultural economy and landscape of the Chippenham area, and into the development of farming practices and their associated buildings over time.

Historic sources indicate that the land surrounding the farm on all sides was farmed as one unit. Whilst buffers have been maintained beyond Showell Farm to the west and north-west to the employment site, it is agreed with the Heritage Impact Assessment that the approved developments will be harmful to the setting of the farmstead. The surrounding land, including the site, which remains in agricultural use has a historic and functional connection with the farmstead that contributes to its significance and its understanding as a farmstead within the rural landscape. Whilst the Heritage Impact Assessment suggests that this is limited by the change of use of Showell farm from agriculture, this is not immediately obvious. To the casual observer and all but close scrutiny, the complex continues to be understood and experienced as a former farmstead set within its remaining agricultural holding. I am also unconvinced by the argument that the development of the land to the rear of the farmstead has already eroded the setting of the heritage assets such that further development would “not introduce a considerable or more harmful form of change.” The remaining agricultural land has a historic functional connection with the house that contributes to its significance and its understanding and experience as a farmstead within the rural landscape and the development of other sections of the agricultural holding having, if anything, increased the value of those sections which remain.

Rowden Conservation Area is centred on the historic manor farmstead of Rowden, covering agricultural land forming a green corridor extending alongside the River Avon into Chippenham town. The conservation area is focussed on the Grade II* listed Rowden Farmhouse and is primarily designated for the historic value of the complex and its associated historic landscape.

Assessment: I agree generally with the submitted Heritage Impact Assessment that, provided that the final layout is largely in accordance with the current illustrative proposal shown in the Design and Access Statement, the impact on the Rowden Conservation Area would be largely neutral due to the retention of open space to the east of the site, albeit that the land would move from agricultural use to become parkland. Whilst this is welcomed within the context of the proposals for the development of the site I am less convinced that it can be considered as a heritage benefit as a similar neutral impact would result from the retention of the status quo or potentially from other development proposals.

With regard to Showell Farm, the Heritage Impact Assessment concludes that the proposed development would result in a level of harm to the significance of the listed buildings and associated curtilage assets via development within their setting and loss of the functionally associated agricultural land but suggests that this would be, to a large extent, mitigated by the retention of a “landscaped buffer between the development and the listed buildings, as well structural planting which will partly remove the current adverse impact of the backdrop setting when viewing the farm complex from the east.....the introduction of sensitively designed residential buildings would be more consistent with the historic pattern of domestic development associated with rural settlement edges.”



However, the illustrated layout included within the D&AS suggests that the proposed development would introduce a suburban form of development close to the farmstead which is out of character with the existing agricultural landscape. The small paddock surrounding the non-designated shelter shed and its enclosure, which is proposed for retention and planting with orchard planting as a buffer, along with a narrow band of land to the north of the site, offer limited mitigation and the development will remove much of the immediate and connected agricultural setting which lies within the field of view from the farmhouse itself and within which the farmstead is experienced more widely, with a consequent diminution of its significance.

This site was proposed for allocation in the Local Plan Review (now withdrawn pending the development of a new local plan under the amended provisions) but the Concept Plan which was developed as part of that policy indicated a significant buffer to the west side of the site to mitigate the impact of the proposed development and preserve the setting of the farmstead as it is approached, from public viewpoints along the B4528. Access to the employment land proposed for development was, in the concept plan, from the roundabout rather than directly from the B4528 which, at present, has a largely rural appearance with green verges, no lighting and largely hidden kerbs. Whilst there is limited detail at present, the proposed access and any associated highway improvements to create an appropriate entrance to a housing estate with signage, lighting, visibility splays and cycle/pedestrian provision has the potential to lead to further erosion of the rural character of the area surrounding the farmstead.

In the absence of amendments to more closely reflect the ‘Concept Plan’, the current development overall including its associated infrastructure, would introduce a suburban form of development which is out of character with the existing agricultural landscape and which fails to achieve the level of mitigation anticipated in the local Plan Review. The submitted Heritage Impact Assessment acknowledges that harm would result “as the historic spatial relationship between the farmstead and the Site would be altered and the wider rural context within which the listed buildings are experienced would be reduced” but concludes that this would be limited via the erosion which has already occurred and mitigated by “the separation created by the B4643, the setback and tapering of development, the provision of open space reflecting

historic field divisions, and the use of appropriate scale, materials and landscape planting” such that the “harm would be at the very low end of the less than substantial harm scale.” In my view, the evidence indicates that the proposed development and its required infrastructure will sever the connection of the farmstead to much of its remaining historic former agricultural landholding to the east which forms the immediate context within which it is experienced and understood. The area to the west and north are already largely developed making the remaining areas the more valuable in this respect. The harm which would result from the proposed development should probably be considered to lie towards the middle of the scale of harm.

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 Heritage Impact Assessment argues that the proposed layout would result in benefit to the conservation area, via “the long-term safeguarding and management of land that reinforces the conservation area's setting and protects it against future encroachment.” However, this benefit does not appear to be dependent on the current scheme and similar benefits would also stem from the layout proposed in the former ‘concept plan’ or potentially from other alternatives.

While the impact on the Rowden conservation area would be largely neutral, the proposed development would result in harm to the setting and significance of the grade II listed Showell Farm complex. 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 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 which require the preservation of the historic environment.

Given that there would be no direct impact on historic fabric, the harm would fall within the category of less than substantial harm. However, the development would fundamentally alter the historic relationship between Showell Farm and a substantial part of its surviving agricultural landholding, thereby eroding the setting in which the designated assets are experienced and understood. In my view, this harm lies towards the middle of the less than substantial range. As currently proposed, the scheme fails to adequately avoid or minimise conflict with heritage objectives and, consequently, I object to the application.

It is understood that 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.