

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/04620
Conversion of curtilage-listed redundant agricultural buildings to form four residential dwellings, including the demolition of modern farm buildings, the formation of a new vehicular access, and associated landscaping, drainage and ancillary works.
Old Manor Farm, High Street, Wedhampton, Devizes, SN10 3QE

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.

These are additional comments based on a revised scheme. The revised scheme addressed some of the concerns previously raised by Conservation.

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. Sections 16 (LBC) and 66 (PP) require 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.

Chapter 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that “Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in chapter 16 of this Framework.”

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](#)

Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency provides specific advice relevant to development of this nature.

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: Conversion of curtilage-listed redundant agricultural buildings to form four residential dwellings, including the demolition of modern farm buildings, the formation of a new vehicular access, and associated landscaping, drainage and ancillary works.

Relevant planning history: Refer to previous comments.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Refer to previous comments.

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.

For a full summary, please refer to previous comments.

Barn 1:

This is a curtilage listed brick built single storey stable building under a slate roof. The western elevation is adjoined by Barn 2. It shares a close spatial relationship with Grade II Listed Old Manor Farm Farmhouse and encloses part of the courtyard grouping.

Barn 2:

This is a curtilage listed open-fronted brick and timber shelter with a pitched slate roof. The barn’s northern elevation is arranged across five open bays that are supported by timber posts and lintels. Two of the columns are braced and appear to be hand-cut. The older posts are showing signs of significant rot and damage. Internally, it possesses an imprinted raised concrete slab floor with integrated gulleys.

Barn 3:

This is a modern steel portal barn with concrete block plinths and clad in asbestos sheeting. It is of no heritage significance.

Barn 4:

This is a large open-faced, brick and timber barn with a slate pitch roof. On the northern elevation of the barn four timber posts support the five open bays. The eastern end (outside the site and in separate ownership) is enclosed by brickwork. On the eastern elevation of the barn there is an upper boarded loading door, along with four modern window and doorway openings, supported by concrete lintels. The rear elevation of the barn is entirely of brick construction with no openings. A public right of way runs behind the building. Barn 4 appears to predominantly post-date 1948, albeit integrating some potentially earlier fabric.

Barn 5:

This is a large brick and timber weatherboarded barn. The northern elevation is clad in weatherboarding. There is a large floor-ceiling opening on the elevation's eastern side, and a large opening in the centre of the elevation. The north-eastern and north western corners of the barn are elevated on staddle stones. A corrugated projecting range adjoins the western elevation of the barn. The southern elevation of the barn is constructed of brick. The barn adjoins Barn 4 at its eastern elevation via a modern link addition. Barn 5 does integrate remains of earlier farm buildings. Barn 5 is considered a curtilage listed building.

Barn 6:

Barn 6 has origins dating back to the late-19th century and is regarded as curtilage listed. Externally, the barn is a long brick-built range with a slate pitch roof. Much of the eastern and western elevations of the barn are screened by Barns 3 and 7. The brickwork and segmental arches of the barn are consistent with its original construction date, albeit there is evidence of some rebuilding (including concrete blockwork additions) and the barn has been re-roofed. Internally, the barn is subdivided into three sections. In the north, there is a small room and an opening to the rest of the barn that is partially filled in by concrete cinder blocks. In the middle section of the barn the eastern elevation is open-fronted, providing an access point to Barn 3. At the southern end of the barn there is a filled in doorway. Much of the internal partition brickwork appears to be of late 19th-century origin, however, it appears to have been rebuilt at various points.

Barn 7:

This is a modern steel portal barn with concrete blockwork and corrugated metal cladding. It is of no heritage significance.

Assessment: This is reassessment following concerns raised on the submitted scheme which has resulted in some amendments to the submitted scheme.

Barn 1 & 2: There was no objection to the principle of conversion or amalgamating the two barns into a single unit. Recommendation was proposed for a change of external design to restore the external appearance of the barns.

The revised scheme has considered the comments and offers a revised scheme which is considered to address the concerns raised. Whilst some boarding/ infilling to one of the openings is proposed, the combination and the covered parking is considered to balance this. This is considered acceptable.

Barn 3: No previous objection to the demolition of this barn.

Barn 4 & 5: There was no objection to the principle of conversion. Recommendation was proposed for a change of external design to restore the external appearance of the barns.

The revised scheme has considered the comments and offers a revised scheme which is considered to address the concerns raised. Whilst some boarding/ infilling to one of the openings is proposed, the combination and the covered parking is considered to balance this. This is considered acceptable.

Barns 6 & 8: The previous comments raised concern over the extension and the subdivision into two units.

The revised scheme has reduced the extent of the extensions, particularly to the rear, and still proposed to convert into two dwelling. The creation of two, 2No. bedrooms increases the requirement of parking and domestic clutter, which has the detrimental impact on the setting of the group of curtilage listed buildings. There is an option with this scheme, as shown with the amended design to Barn 1, to allow the existing open sheds to provide parking and storage (bin, bike, etc), which reduces the pressure on the farmyard and surrounding area to accommodate this need. The regular fenestration pattern and window type to Barn 6 is very domesticated and does not respond to the character of the former agricultural buildings. Whilst there has been some improvement to the revised design, it is not considered to go far enough to help mitigate the harm.

No additional information has been supplied, as previously requested:

As well as the above comments for each building, this proposal lacks essential information and details for the proposed conversion of the buildings in the farmstead grouping:

- *schedule of repairs and repairs for each building (including timber frame);*
- *drawings showing proposed insulation and thermal upgrading of the structures;*
- *drawings showing proposed installation of modern services; and*
- *details evidencing the retention and encouragement of wildlife habitats.*

Layout: The previous comments raised a query over the proposed change of farm access to the group and the loss of trees in the conservation area. The internal courtyard was considered to be unduly dominated by parked cars, and other domestic clutter resulting in a suburban garden, rather than considering the 'yardscape' character.

The revised layout has considered some of these aspects by creating a more open courtyard, with a small grass area, but retains the proposed garden for Barn 1 & 2. Some of the parking has been adjusted, but there still is external parking for Barns 6 & 8 within the farmyard, of which Barn 8 will be visible from the street scene.

The surface area will be a porous tarmac, similar to some of the hardstanding on the site at present. Some change of surfaces can assist with the setting of the buildings and help discourage the parking in front of the buildings.

The proposed relocation of the vehicle access is to allow for a private amenity space to be formed for Barns 1 & 2, and to improve visibility. The loss of the curtilage listed wall, and the change of entrance is considered to cause some harm, but as it would improve safety, this is considered a public benefit.

The loss of the trees to the front elevation is considered to cause harm to the character of the conservation area, even if they are not considered to be worthy trees. The loss of these trees and the low level (curtilage listed) wall could result in future pressure for a taller fence to create 'private' amenity space to Barn 1 & 2. The addition of a close boarded fence or increasing the height of the wall would not be supported. There may be a more sensitive approach, such as creating a slightly taller wall, and then reducing the height of the wall, similar to the wall to the left-hand side of the Barn 1.

There are no details of external lighting or location of EV chargers which would encroach on the urban appearance.

Whilst there is some improvement to the proposed scheme, there are still elements of concerns. If minded to approve, several conditions will need to be applied to ensure the long-term protection of the buildings due to the limited information submitted in the application.

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.

Any conversions to residential use is likely to result in some level of harm due to the requirements of a dwelling. This is particularly true for a farmstead conversion, which requires additional services, improvements to the fabric to create safe and habitable houses (insulation, windows, etc), and the external requirements of parking, bin stores, EV chargers, and boundary treatments. There is no simple solution, and whilst some harm is inevitable, it can be balanced with the heritage benefits of bringing the buildings into long term sustainable use. However, a balance needs to be found, and where possible harm should be reduced as far as possible. This may result in fewer units than ideal or a more creative approach to address

areas of harm. Whilst the revised scheme has addressed a majority of concerns, there are still concerns over the Barn 6 & 8 and the landscaping within the farmyard.

The proposals will result in harm to the buildings via the loss of historic fabric and character. The proposals could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but that should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 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 no objective justification has been provided for the works and 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.