

**Re: Retrospective application for photovoltaic panels at Moorfield Lodge,
2A Church Street, Steeple Ashton**

I am writing in respect to the retrospective applications concerning the extensive photovoltaic installation on Moorfield Lodge, 2A Church Street.

I would like to state at the outset that I recognise and support the principle of renewable energy, and while my objection is not to solar generation itself, in this case it is to the scale, siting and visual impact of this particular installation within the Steeple Ashton Conservation Area and within the curtilage and setting of a Grade II listed building, together with what I consider to be significant shortcomings in the assessment of its heritage and visual impact.

Length of time for which the installation has remained unauthorised

The application states that the works commenced on 10 December 2012. Permission is therefore being sought approximately fourteen years after the installation commenced. The application also states that the works were completed on 8 May 2025. I would ask the Council to establish precisely what was installed in 2012, what additional works took place subsequently, and particularly what works were undertaken in or around 2025. I believe this is important because this should not simply be considered as an administrative exercise to 'sign off' a long-established installation. It is a fresh assessment of whether an extensive installation is acceptable in heritage and planning terms. In addition, no explanation appears to have been provided as to why the necessary consent was not sought at the time of installation or for such a lengthy period afterwards.

Previous retrospective application at the same property

The previous point is particularly difficult to understand because the applicant has recently been through the planning process for other retrospective works at Moorfield Farm. Application PL/2026/00550 concerned retrospective alterations including solar panels on the farmhouse and was approved in May 2026. At the time of submission, the Council considered the heritage implications of those panels sufficiently important to impose a specific condition requiring their removal when they cease to be operational, expressly to ensure the long-term preservation of the character and appearance of both the listed building and the Steeple Ashton Conservation Area.

The substantially larger photovoltaic installation on Moorfield Lodge was already present at that time. I would therefore ask the Council to consider why this much larger installation was not identified and addressed as part of that process, particularly given that both installations form part of the same property and heritage setting. The present application appears to have arisen only after the existence of the larger installation became apparent during consideration of the recent planning matters.

Significant discrepancy concerning the scale of the installation

I am particularly concerned about the description contained within the submitted Heritage, Design and Access Statement.

Section 3.01 states: "Four photovoltaic panels have been installed on the south-facing roof slope of the outbuilding." That description does not appear remotely consistent with either the submitted drawings or the applicant's own aerial photograph. Those documents show a substantial photovoltaic array extending across a significant proportion of the roof area of Moorfield Lodge, including both pitched and flat roof surfaces. This is not a minor discrepancy. Scale and visual prominence are fundamental to assessing the effect of development upon a Conservation Area and the setting of a listed building. I therefore request that the Council establish the exact number, dimensions and total area of panels installed and require the heritage assessment to address the installation that actually exists.

I do not believe a conclusion of "no heritage harm" can safely be reached based on an assessment which appears to describe a four-panel installation when the submitted plans and photographs show something substantially larger.

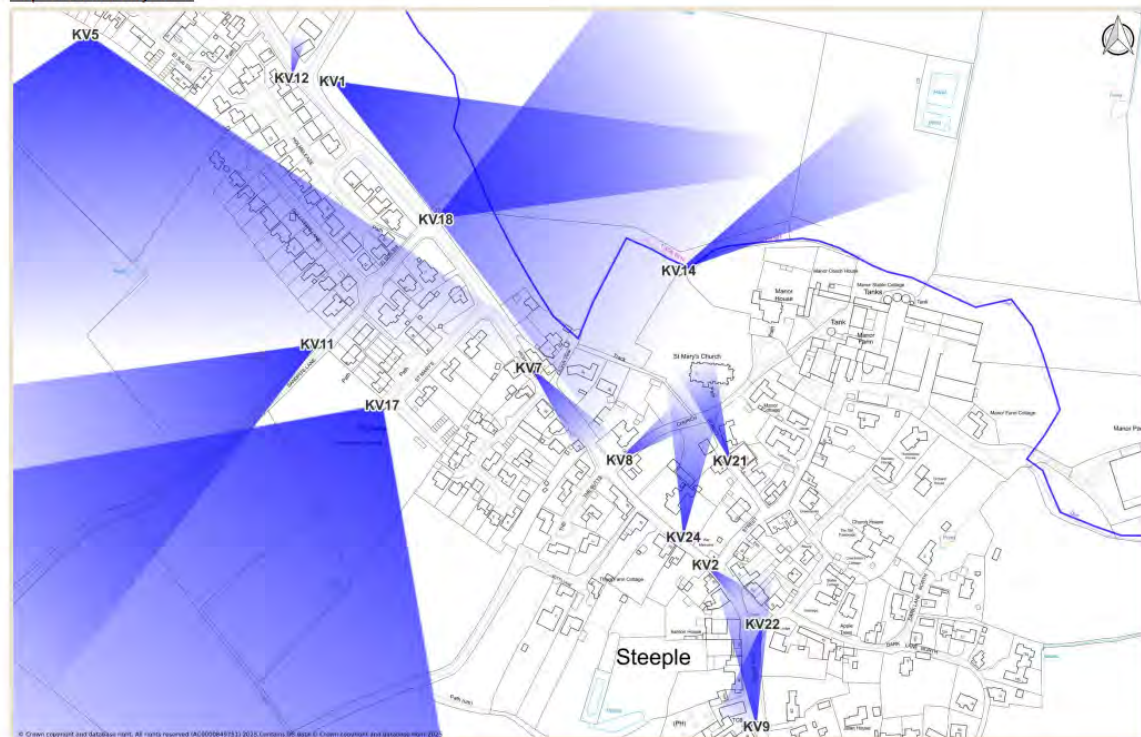
Visibility and the Conservation Area

The Heritage, Design and Access Statement also states: “Due to the outbuilding’s position behind the main house and boundary walls, the panels are not visible from Church Street or other public vantage points.” It subsequently relies upon this assertion to conclude that there is “no impact on the character or appearance of the Conservation Area”.

I would like to question that conclusion. The panels are visually prominent from the High Street side of number 9 High Street and from locations within the historic core of the village. The fact that they may not be visible from Church Street does not establish that they do not affect the wider Conservation Area. The appropriate test should not simply be whether the panels can be seen from the road immediately adjoining the applicant’s property. The assessment should consider their visibility within the Conservation Area as a whole and therefore their effect upon important views through the historic village.

This is particularly significant in Steeple Ashton. The emerging Steeple Ashton Neighbourhood Development Plan identifies important views within and around the historic village. One of those identified views – Key View KV24 – is specifically the “View north from High Street at entrance to Goodards looking towards church.”

Map 1B: Central Key Views



Goodards is 9 High Street, immediately adjacent to the application site and is the property directly affected by the outlook towards the installation. The neighbourhood planning work therefore provides specific local evidence that this is not an incidental or unimportant outlook. The view from precisely this part of High Street towards the church and historic core has been identified through the neighbourhood planning process as a view worthy of protection. I would ask the case officer and Conservation Officer to inspect the installation from High Street, including the vicinity of the entrance to Goodards, rather than relying upon the assertion in the applicant’s Heritage Statement that the panels are not visible from public viewpoints.

Character of Steeple Ashton

Steeple Ashton is not an ordinary residential location. It has an important historic townscape, with a substantial concentration of listed buildings centred around High Street, Church Street and St Mary’s Church. The historic character of this part of the village is derived not merely from individual listed

buildings but from the relationship between traditional roofs, gardens, walls, mature planting, historic buildings and views towards the church. The emerging Neighbourhood Development Plan expressly seeks to protect this historic character and identifies views towards the church and through the historic centre as important to the identity of Steeple Ashton. A large modern photovoltaic array occupying a substantial roof area within this sensitive historic setting therefore deserves considerably more careful assessment than appears to have been undertaken in the submitted Heritage Statement.

Retrospective development and the integrity of Conservation Area controls

I appreciate that retrospective planning applications are expressly provided for within the planning system and that an application cannot properly be refused merely because development was undertaken without permission. Nevertheless, it would make sense that retrospective status does not reduce the heritage test that should be applied. The purpose of designating a Conservation Area is to protect the special architectural and historic character which justified that designation. If substantial alterations can be undertaken first and assessed many years later on the basis that they are already there, there is a danger that the protections associated with Conservation Area and listed-building controls become progressively undermined. The current application should therefore be assessed in the same way as if the applicant were proposing to install this extensive array today.

The question should perhaps be: *Would an array of this scale, in this location, within the curtilage and setting of a Grade II listed building and within this particularly sensitive part of the Steeple Ashton Conservation Area, be considered acceptable if permission were being sought before installation?* Its existence for a lengthy period should not itself justify retention.

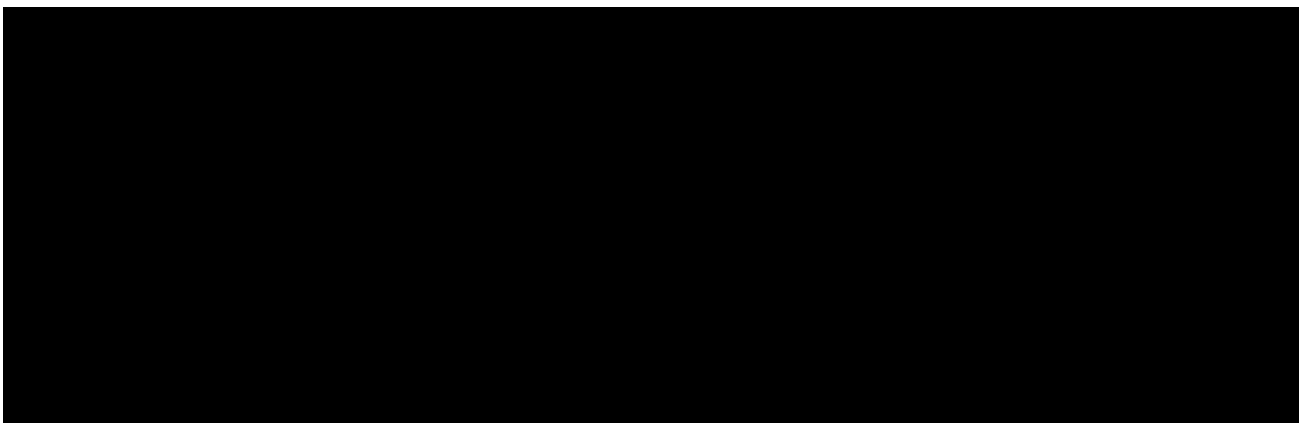
History of retrospective applications

I also ask the Council to consider the planning history of the property. The recently approved application PL/2026/00550 was itself a retrospective application covering a number of alterations, including solar panels. The present application is again retrospective and concerns an installation which the applicant states commenced in December 2012, and I do believe that this repeated need to approve works retrospectively is a legitimate matter of concern, particularly in relation to a Grade II listed property within a Conservation Area. It is also difficult to reconcile the detailed consideration given to the smaller solar installation during PL/2026/00550 with the apparent absence of any consideration at that stage of the substantially larger installation on Moorfield Lodge. I would therefore ask the Council to examine the full planning and listed-building consent history of the property before determining these applications.

Neighbour consultation

I note that five neighbouring properties have been notified, including Goodards at 9 High Street and Moorfield Farm itself. Given the orientation and visibility of the panels, I would ask the Council to satisfy itself that consultation has adequately captured those properties and public viewpoints from which the array is actually visible. The principal visual impact is towards the High Street side rather than simply towards Church Street. This is particularly relevant given the identification of the view from the entrance to Goodards towards the church as Key View KV24 in the emerging Neighbourhood Development Plan. It does not seem compelling to consider the impact on neighbours on the Northern side of the panels compared to those to the South of the installation – given the panels' express purpose.

Personal circumstances concerning Goodards



Response to the Conservation Consultation dated 17 September 2026

I have now considered the Conservation Consultation response dated 17 September 2026. I note that its stated scope is expressly limited to the built historic environment. It is therefore important that the Conservation Officer's "no objection" is not treated as resolving the separate planning question of the effect of the development on the amenity of neighbouring occupiers, including Goodards. Goodards is not a listed building, but that does not make the effect on its occupants irrelevant to the overall planning decision.

The consultation response itself cites Core Policy 57, but only in relation to character and design. Core Policy 57 also requires development to have regard to the compatibility of adjoining buildings and uses and to the impact on the amenities of existing occupants. The array is immediately adjacent to the principal garden and outlook of Goodards and is a large, visually dominant modern roof installation when experienced from that property. I therefore ask the case officer to assess residential amenity separately from the Conservation Officer's heritage assessment. I appreciate that planning does not protect a private view as such; my concern is instead the scale, proximity and visual dominance of the installation in the outlook and principal private amenity space of the neighbouring dwelling, considered alongside the sensitive Conservation Area context.

There are also several aspects of the Conservation Consultation itself which I believe require reconsideration before it can safely support a decision:

First, the response records "Relevant planning history: NA". That is difficult to reconcile with PL/2026/00550, determined only a few months earlier at Moorfield Farm, which was itself a retrospective application covering alterations including solar panels and resulted in a specific condition directed to preserving the listed building and the Steeple Ashton Conservation Area. The relationship between that decision and the present, substantially larger array should be considered rather than the site being treated as having no relevant planning history.

Second, the Conservation Officer expressly acknowledges that the applicant's Design and Access Statement provides only a "limited assessment" of the significance of the designated heritage assets and a "very brief impact assessment". That is significant because the same applicant document describes only four photovoltaic panels, whereas the submitted drawings and photographs show a much larger installation over pitched and flat roof areas. If the underlying description of the development is materially inaccurate, I do not understand how a limited and very brief heritage assessment can provide a reliable basis for a conclusion of neutral impact.

Third, the consultation states categorically that "The panels cannot be seen from the public realm". The supporting photographs submitted with this representation contradict that proposition. In particular, the photograph taken from The Butts shows the array in the middle background within the wider historic roofscape and in visual relationship with St Mary's Church. This is not simply a private view from Goodards. I therefore ask that this factual conclusion is revisited following a site inspection from the identified public viewpoints.

Fourth, the response goes on to state that "even if" the panels were visible, their location amongst a cluster of subservient buildings would mean they were not out of character. That appears to substitute an assumption for an assessment of the actual view. Historic England's guidance on setting specifically requires consideration of the contribution that settings and views make to significance and to the ability to appreciate that significance. The relevant question is therefore not simply whether the panels sit on a

subservient building, but how this extensive dark, modern roof covering is experienced within the historic roofscape and in views towards and around the listed buildings and church.

Fifth, the conclusion that the panels are on a “less sensitive roof slope” appears to be based principally on retention of a tiled roof towards Church Street. That does not address the southern and High Street side of the site, from which the array is prominent. The emerging Neighbourhood Development Plan’s identification of KV24 — the view north from High Street at the entrance to Goodards looking towards the church — reinforces the importance of assessing this side of the site rather than treating Church Street as the only relevant public-facing elevation.

Finally, the Conservation Officer identifies the relevant issues as the impact on the listed building, the setting of neighbouring listed buildings and the Conservation Area. Those are properly heritage matters, but they are not the entirety of the planning assessment. The case officer should also determine whether the installation has an unacceptable effect on neighbouring residential amenity under Core Policy 57. The absence of an objection from the Conservation Officer should therefore not be interpreted as a finding that there is no impact upon Goodards or its occupants.

Requested action

I respectfully ask Wiltshire Council:

1. Not to accept the submitted Heritage, Design and Access Statement's description of the development without clarification, particularly the statement that only four photovoltaic panels are installed.
2. To require an accurate schedule and plan of the complete installation, identifying the number, dimensions, roof coverage and installation dates of all panels.
3. To establish what works were undertaken in 2012 and what works were undertaken subsequently, particularly given the application's stated completion date of May 2025.
4. To undertake a site inspection from High Street, The Butts and the vicinity of Goodards, including the viewpoint identified as KV24 in the emerging Steeple Ashton Neighbourhood Development Plan, and to reconsider the Conservation Consultation statement that the panels cannot be seen from the public realm.
5. To ask the Conservation Officer to reconsider the heritage conclusion against the actual scale of the array shown on the submitted drawings and photographs, the acknowledged limited nature of the applicant's heritage assessment, and the photographs accompanying this representation.
6. To take PL/2026/00550 into account as relevant planning history and explain why the Conservation Consultation records “Relevant planning history: NA” despite the recent retrospective permission at the same property including solar panels and heritage-related conditions.
7. Separately from the heritage consultation, to assess the effect of the array on the residential amenity of the occupants of Goodards under Core Policy 57, including its scale, proximity and visual dominance when experienced from the house, driveway and principal garden. This is not advanced as a claim to a protected private view, but as a question of neighbouring amenity and the quality of the residential environment.
8. To consider whether the scale of the installation could reasonably be reduced, relocated or otherwise mitigated if the Council concludes that renewable-energy provision can be accommodated without the present level of visual and amenity impact.

The issue is not whether renewable energy is desirable; clearly it is. The issue is whether an extensive solar installation in one of the most historically sensitive parts of Steeple Ashton has been appropriately located and whether its actual effect upon the Conservation Area has been properly assessed.

On the documents currently submitted, I do not believe that has been demonstrated.

In particular, an assessment which describes the development as four panels, while the drawings and photographs show a substantially larger array, cannot in my view provide a sufficiently robust basis for

determining heritage impact. The subsequent Conservation Consultation acknowledges that the applicant's assessment is limited and very brief, yet nevertheless relies on the proposition that the panels cannot be seen from the public realm — a proposition contradicted by the supporting photograph from The Butts. Nor does that consultation address the separate residential amenity impact upon Goodards, because its stated scope is confined to the built historic environment. I therefore respectfully request that permission and listed building consent should not be granted until these factual and assessment issues have been properly investigated and the case officer has separately considered neighbouring amenity under Core Policy 57.

Please see the following images of the site.

Supporting Images

View from The Butts, over High Street to St Mary's showing Solar Panels in middle background



Aerial View of Steeple Ashton and No 9 High Street and Solar Panels



No 9 High Street and Solar Panels at Moorfield Lodge



View to St Mary's, KV 24



Back garden of No 9 High Street, looking towards Tyler's Cottage, St Mary's and Moorfield Lodge



Back garden of No 9 High Street, looking towards Moorfield Lodge



Front of No 9 High Street, looking towards Church Street



Driveway of No 9 High Street, looking towards St Mary's. KV 24



Aerial views of back garden of No 9 High Street, showing the visually dominant solar panel array on Moorfield Lodge





View from No 9 High Street to St Mary's circa 2000

