Built Heritage Statement

17 St Martins, Marlborough

On behalf of Emma Sherston

Date: December 2023 | Pegasus Ref: P23-2038

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	December 2023	HP	CG	--

Contents.

1. Introduction 1
2. Site Description and Site Development 3
3. Methodology 7
4. Policy and Framework 9
5. The Historic Environment 10
6. Assessment of Impacts 14

Appendices.

Appendix 1: Assessment Methodology 17
Appendix 2: Legislative Framework 24
Appendix 3: National Policy Guidance 26
Appendix 4: Local Policy 33
Appendix 5: 11-18, Saint Martins List Entry 34

Plates.

Plate 1: Site Location Plan 1
Plate 2: 17 St Martins, Marlborough (front elevation). 3
Plate 4: 1886 Ordnance Survey Map, site highlighted in red and wider Listed Building in blue. 5
Plate 5: 1900 Ordnance Survey Map. 5
Plate 6: 1943 Ordnance Survey Map. 6
Plate 7: 2002 Google Satellite Imagery. 6
Plate 9: Early to mid-20th-century brick fireplace. 12

1. Introduction

1.1. Pegasus Group have been commissioned by Emma Sherston to prepare a Built Heritage Statement to consider the internal alterations at 17 St Martins, Marlborough, as shown in the Site Location Plan at Plate 1.



Plate 1: Site Location Plan

1.2. The site comprises a single-storey plus attic roof, terraced dwelling fronting south onto St Martins. The property forms part of the wider Grade II Listed 11-18, Saint Martins, which falls within the Marlborough Conservation Area.

1.3. This application seeks Listed Building Consent for the removal of the existing fire surround and installation of a wood burner within the fireplace void which will reuse the existing chimney and pots.

1.4. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 194 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".[1]

1.5. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 199 to 203 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

[1] Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework (NPPF)* (London, September 2023), para. 194.

1.6. As required by paragraph 194 of the *NPPF*, the detail and assessment in this Report is considered to be "*proportionate to the assets' importance*".[2]

[2] DLUHC, *NPPF*, para. 194.

2. Site Description and Site Development

Site Description

2.1. The site is located at 17 St Martins; a single-storey terraced cottage with habitable roof space and dormers. The dwelling forms part of an irregular row of terraced properties which face south onto St Martins, which is predominantly residential in character. A small, linear garden lies to the rear of the building, featuring a stone-paved terrace, a lawn and a red brick outhouse.



Plate 2: 17 St Martins, Marlborough (front elevation).

Architectural Appearance

2.2. No. 17, St Martins is timber-framed made up of a brick infill and a clay tiled roof. The front façade is made up of a single doorway and timber-framed, six-pane casement window at the ground floor, and a single gable dormer casement window at the attic level.

2.3. The rear of the cottage features a later-built red-brick extension of three bays, with a central doorway and flanking casement windows, one metal and one timber. A small gable dormer casement window is also on the rear elevation.

2.4. Based on their current external appearance, Nos. 16 and 17 St Martins look as though they previously formed one whole property and were later divided into separate dwellings during the late-19th century. As a result of this, there is a mixture of original and modern fabric within the interior of the cottage. Notable elements of historic interest include the exposed timber-frame, later brick fireplace and early chimney breast.



Plate 3: The existing chimney and pots when viewed from the rear garden.

Site Development / Map Regression

2.5. The List Entry states that the row of terraced cottages originates from the 18th century. One of the earliest depictions of the properties is in the later 1884 Ordnance Survey Map. Here, Nos. 16 and 17 are read as one whole property forming an L-shape plan. The cottage is illustrated as one unit up until after 1943 and believed to have been divided into two properties sometime during the late-20th century. It is in 2002 Satellite Imagery where the arrangement of the rear garden plots indicates the earlier, larger property had been subdivided. The site's existing rear extension, which extends across nos. 17 and 18, appears to have been constructed by 1884, however, its current appearance indicates it was a late-19th century construction. The extension likely experienced further modification when the building was divided in the mid to late 20th century.

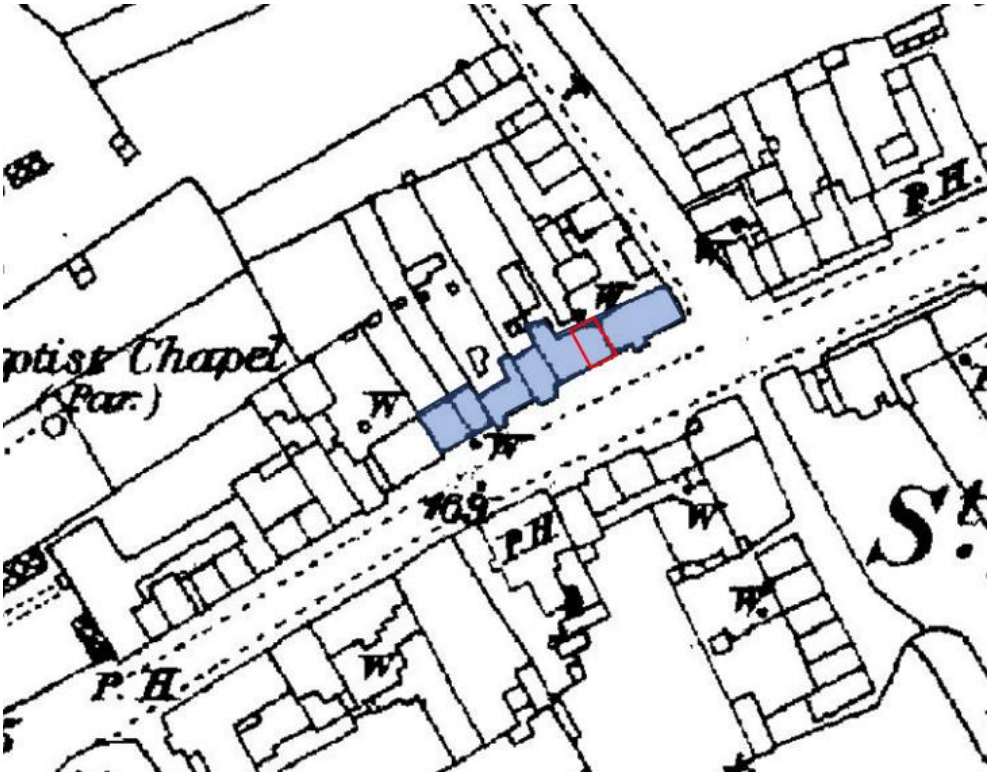


Plate 4: 1886 Ordnance Survey Map, site highlighted in red and wider Listed Building in blue.

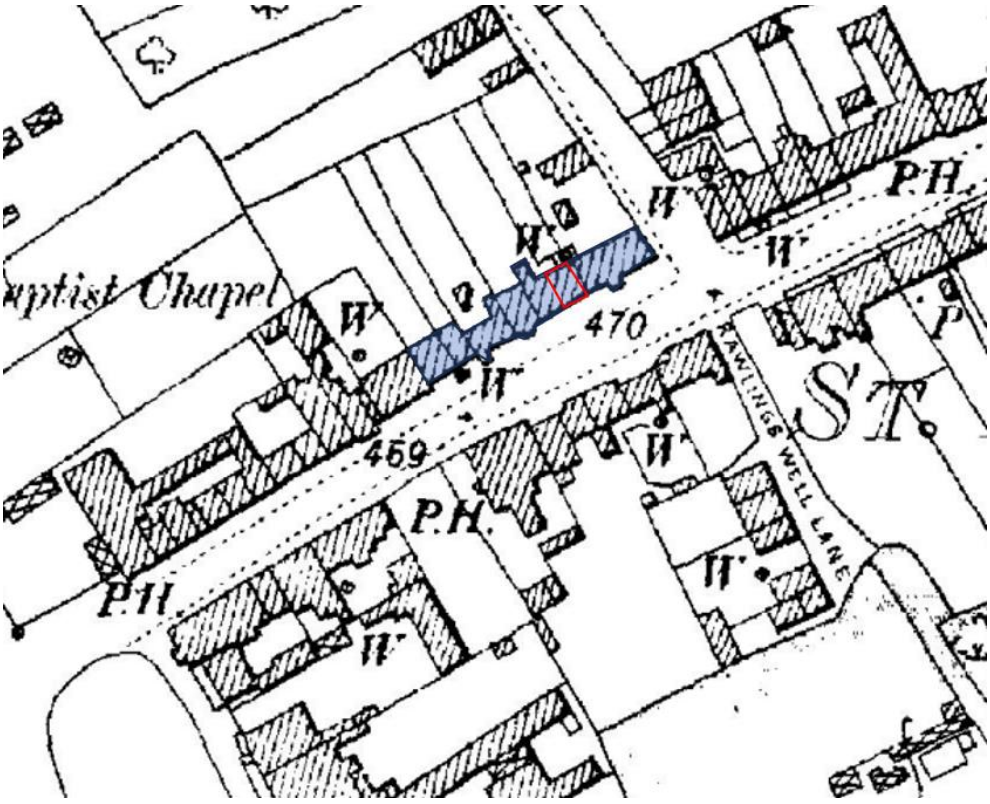


Plate 5: 1900 Ordnance Survey Map.



Plate 6: 1943 Ordnance Survey Map.



Plate 7: 2002 Google Satellite Imagery.

Planning history

2.6. A review of recent planning history records held online by Wiltshire Council has revealed no relevant previous applications for the site.

3. Methodology

3.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

3.2. This assessment considers built heritage.

Sources

3.3. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- Historic maps available online;
- Aerial photographs available online via Historic England's Aerial Photo Explorer and Britain from Above;
- Google Earth satellite imagery.

Site Visit

3.4. A site visit was undertaken by a Heritage Consultant from Pegasus Group on 18th September 2023, during which the site and its surrounds were assessed.

Photographs

3.4.1. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate visual representations of the site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

3.5. Full details of the assessment methodology used in the preparation of this Report are provided within ***Appendix 1***. However, for clarity, this methodology has been informed by the following:

- *Historic Environment Good Practice Advice in Planning: 2 - Managing Significance in Decision-Taking in the Historic Environment* (hereafter *GPA:2)*;[3]

[3] Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment (GPA:2)* (2nd edition, Swindon, July 2015).

- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) - The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter *GPA:3*);[4]
- *Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation and Management* (hereafter *HEAN:1*).[5]
- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter *HEAN:12*);[6] and
- *Conservation Principles: Polices and Guidance for the Sustainable Management of the Historic Environment*.[7]

[4] Historic England, *Historic Environment Good Practice Advice in Planning Note 3 - The Setting of Heritage Assets (GPA:3)* (2nd edition, Swindon, December 2017).
[5] Historic England, *Historic England Advice Note 1 - Conservation Area Appraisal, Designation and Management (HEAN:1)* (2nd edition, Swindon, February 2019).
[6] Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets (HEAN:12)* (Swindon, October 2019).
[7] English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

4. Policy and Framework

Legislation

4.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings and Conservation Areas.[8]

4.2. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[9]

4.3. Full details of the relevant legislation are provided in ***Appendix 2***.

National Planning Policy Guidance

4.4. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework* (*NPPF*), an updated version of which was published in September 2023. The *NPPF* is also supplemented by the national *Planning Policy Guidance* (*PPG*) which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.[10] The PPG also contains the *National Design Guide*.[11]

4.5. Full details of the relevant national policy guidance is provided within ***Appendix 3***.

The Development Plan

4.6. Planning applications within Wiltshire are currently considered against the policy and guidance set out within the Wiltshire Council Core Strategy (adopted January 2015). The full details of the relevant policy can be found in ***Appendix 4.***

[8] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[9] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).
[10] Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment.
[11] Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).

5. The Historic Environment

5.1. The following Section provides an assessment of elements of the historic environment that have the potential to be impacted upon by the proposed development.

5.2. As set out in **Section 1,** the site comprises the Grade II Listed 11-18, Saint Martins, which falls within the Marlborough Conservation Area.

5.1. With regards to other heritage assets within the surrounds of the site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development. [12]

5.2. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.

5.3. It is however widely accepted (paragraph 207 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.[13] In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.

5.4. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.

5.5. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.

5.6. It has been observed that the following heritage assets have the potential to be sensitive to the development proposals and thus these have been taken forward for further assessment below:

- Grade II Listed 11-18, Saint Martins (NHLE ref. 1243234).

5.7. Whilst the site falls within the boundaries of the Queen's Gate Conservation Area, the works are localised to the interior of the property, and as such, will not result in any physical manifestations which would have the potential to impact the character and appearance of the Conservation Area. Therefore, an assessment of the Conservation Area will not be undertaken.

5.8. With regard to other heritage assets in the vicinity of the site, assessment has concluded that the site does not form any part of setting that positively contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not

[12] Historic England, *GPA:3*, p. 4.
[13] DLUHC, *NPPF*, para. 207.

anticipated to result in a change that would impact upon the overall heritage significance of these assets. Other heritage assets have therefore been excluded from further assessment within this Report.

Grade II Listed 11-18 Saint Martins

5.9. Nos. 11-18 St Martins was added to the National List on 21st October 1974 (NHLE 1243234). The List Entry describes the building as follows:

"SAINT MARTINS 1. 5407 (North Side) Nos 11 to 18 (consec) SU 1969 1/89 II GV 2. C18. 2 storeys. Brick, some colourwashed. Old roofs. Some C18, mostly C19 casements and doors. Nos 6 to 28 (consec) form a group."

5.10. The full List Entry is included in ***Appendix 5***.

5.11. Nos. 11-18 St Martins is an irregular row of terraced cottages lining the northern frontage of St Martins. The cottages range between one and two storeys. Nos. 16 to 18 are similar whitewashed brick buildings, one storey tall with dormer attics, and slanted slate tiled roofs. Nos. 11 to 15 comprise exposed red brick and are two-three storeys tall. The roof line across the row of cottages is misaligned and of varying styles.

Statement of Significance

5.12. The Grade II Listing of the building highlights that it is a heritage asset of less than the highest significance as defined by the NPPF. This significance is consolidated by its inclusion within the boundaries of Marlborough Conservation Area.

5.13. The heritage significance of the asset is principally embodied in its exterior physical fabric which derives historic and architectural interest as an 18th-century row of terraced cottages of varying vernacular styles. This is further reinforced by the group value each cottage has with each other by being included within one wider designation.

5.14. No. 17 St Martins was a later addition in the row of terraced properties and was formerly part of the wider No. 16 St Martins. Despite the internal division of the building, the external appearance of the cottage has remained relatively unchanged and is still illustrative of the singular property appearance. This is certainly the case at the front of the building, whereas later rear extensions and the division of the garden plots makes the former association less apparent.

5.15. The existing brick fire surround within the property appears to be an early to mid 20th-century addition to what is expected to be the original fireplace and chimney behind. The form of the building's original chimney breast, which is quite substantial in scale and suggests a previous larger fireplace, is evident across both floors and as such comprises historic and architectural interest through its historic fabric and as an example of an original feature to the building. Whilst the fireplace is an element reflective of its time period, it does not comprise any unique detail or style. As such its limited historic interest makes a neutral contribution to the overall heritage significance of the wider Listed Building.



Plate 8: Early to mid-20th-century brick fireplace.



Plate 9: The chimney within the existing stairwell.

5.16. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset (its 'setting') which are considered to contribute to its heritage significance comprise:

- The wider northern frontage of St Martins, with several buildings designated in their own right;
- The wider St Martins and the adjoining Blowhorn Street, Poulton Hill and Herd Street;
- The Green, located at the western end of St Martins; and
- The wider Marlborough Conservation Area.

6. Assessment of Impacts

6.1. This Section addresses the heritage planning issues that warrant consideration in the determination of the application for Planning Permission and Listed Building Consent for a single-storey extension to the rear of the dwelling. This includes internal alterations comprising the conversion of the existing bathroom and kitchen at ground floor and the installation of an ensuite bathroom in one of the upper floor bedrooms.

6.2. As detailed above, the *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission, including those for Listed Building Consent are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.

6.3. The statutory requirement set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their settings. Section 72(1) of the Act confirms that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the asset, as well as the protection of the character and appearance of a Conservation Area.

6.4. In addition, the NPPF states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Conservation Areas, and this needs to be the primary consideration when determining the acceptability of the proposals.

6.5. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "substantial harm" or "less than substantial harm" to the identified designated heritage assets, in the context of paragraphs 201 and 202 of the NPPF.[14] With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 203 of the NPPF.[15]

6.6. The PPG clarifies that within each category of harm ("less than substantial" or "substantial"), the extent of the harm may vary and should be clearly articulated.[16]

6.7. The guidance set out within the PPG also clarifies that "substantial harm" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.[17] In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:

"...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."[18]

[14] DLUHC, *NPPF*, paras. 201 and 202.
[15] DLUHC, NPPF, para. 203.
[16] DLUHC, PPG, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[17] DLUHC, PPG, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).
[18] EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

11-18 St Martins

6.8. The proposals seek to remove the existing brick fire surround, open up the wall behind to expose the earlier fireplace and install a wood burning stove within the void. The condition and size of the fireplace behind the brick surround is uncertain, however, the applicant is happy to provide further details and confirmation of the size of the void following implementation of the works (i.e. removal of the existing surround).

6.9. It has been established that the existing fire surround derives very little historic interest and is an element of the building which if lost would not result in any negative impact to the overall heritage significance of the Listed Building. Removing the existing fire surround and subsequent installation a new wood burner will reinstate the original fireplace and the use of this feature of the building, thus having a positive impact on the historic and architectural interests of the building.

6.10. The use of the existing chimney may require the installation of lining, but this will not affect the overall appreciation of this feature of the building. Moreover, the existing chimney pots will be re-used.

6.11. The proposed appearance of the fireplace within the ground floor room will be confirmed upon the removal of the existing surround, but based on the timber and brick construction of the building and the size of the chimney breast, it is assumed that a timber lintel will be in place over the fireplace, which will be revealed. Photos from within the fireplace indicate the presence of a timber beam. The proposed drawing has indicated the lintel over the void containing the new wood burner. The suitability of the lintel will need to be assessed following removal of the fire surround.



Plate 10: Photo of timber beam above fireplace (taken within the fireplace).

6.12. Furthermore, it should also be reiterated that the group value of the terraced houses which form the Listed Building and other elements of its significance, such as the front elevation, will be retained and unaffected by such proposals. Therefore, with reference to the levels of harm in the NPPF, the proposals overall will result in 'no harm' to the significance of the Grade II Listed Building.

6.13. The proposals will therefore satisfy the statutory requirement set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Appendix 1: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

> ***"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[19]

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.[20]

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.[21] These essentially cover the heritage 'interests' given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.[22]

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.[23]

Significance results from a combination of any, some, or all of the interests described above.

---

[19] DLUHC, *NPPF*, pp. 71-72.
[20] Historic England, *GPA:2*.
[21] Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being 'aesthetic', 'communal', 'historical' and 'evidential', see idem pp. 28–32.
[22] DLUHC, *NPPF*, p. 71; DLUHC, *PPG, Annex 2*.
[23] DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

The most-recently issued Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report. [24]

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the NPPF:

> ***"Significance derives not only from a heritage asset's physical presence, but also from its setting."*** [25]

Setting is defined as:

> ***"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, may affect the ability to appreciate that significance or may be neutral."*** [26]

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of "*what matters and why*".[27]

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than

---

[24] Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets, Historic England Advice Note 12* (Swindon, October 2019).
[25] DLUHC, *NPPF*, p. 72.
[26] DLUHC, *NPPF*, p. 71.
[27] Historic England, *GPA:3*, pp. 8, 11.

visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

> ***Paragraph 25 – "But – again in the particular context of visual effects – I said that if "a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape" (paragraph 56)".***
>
> ***Paragraph 26 – "This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, "the historic relationship between places". Historic England's advice in GPA3 was broadly to the same effect."*** [28]

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance,** as identified in paragraph 200 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 68 of the NPPF;[29]

- **Designated heritage assets of less than the highest significance,** as identified in paragraph 200 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);[30] and

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as "*buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in*

[28] Catesby Estates Ltd. V. Steer [2018] EWCA Civ 1697, paras. 25 and 26.
[29] DLUHC, *NPPF*, para. 200 and fn. 68.
[30] DLUHC, *NPPF,* para. 200.

planning decisions, but which do not meet the criteria for designated heritage assets".[31]

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Grading significance

There is no definitive grading system for assessing or categorising significance outside of the categories of Designated Heritage Assets and Non-Designated Heritage Assets, specifically with regards to the relative significance of different parts of an asset.

ICOMOS guidance recognises that a degree of professional judgement is required when defining significance:

> ***"…the value of heritage attributes is assessed in relation to statutory designations, international or national, and priorities or recommendations set out in national research agendas, and ascribed values. Professional judgement is then used to determine the importance of the resource. Whilst this method should be used as objectively as possible, qualitative assessment using professional judgement is inevitably involved."***[32]

This assessment of significance adopts the following grading system:

- **Highest significance:** Parts or elements of a heritage asset, or its setting, that are of particular interest and are fundamental components of its archaeological, architectural, aesthetic or historic interest, and form a significant part of the reason for designation or its identification as a heritage asset. These are the areas or elements of the asset that are most likely to warrant retention, preservation or restoration.

- **Moderate significance:** Parts or elements of the heritage asset, or its setting, that are of some interest but make only a modest contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that might warrant retention but are capable of greater adaption and alteration due to their lesser relative significance.

- **Low or no significance:** Parts or elements of the heritage asset, or its setting, that make an insignificant, or relatively insignificant contribution to the archaeological, architectural, aesthetic or historic interest of the heritage asset. These are likely to be areas or elements of the asset that can be removed, replaced or altered due to their minimal or lack of significance and are areas and elements that have potential for restoration or enhancement through new work.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or

[31] DLUHC, *PPG*, paragraph 039, reference ID: 18a-039-20190723.
[32] International Council on Monuments and Sites (ICOMOS), *Guidance on Heritage Impact Assessment for Cultural World Heritage Properties* (Paris, January 2011), paras. 4-10.

enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighing exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would "have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced";[33] and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the *PPG* states:

> ***"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."***[34]

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, "*preserving*" means doing "*no harm*".[35]

Preservation does not mean no change, it specifically means no harm. *GPA:2* states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".[36] Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".[37] Of particular relevance is the checklist given on page 13 of *GPA:3*.[38]

It should be noted that this key document also states:

---

[33] Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.
[34] DLUHC, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[35] R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).
[36] Historic England, *GPA:2*, p. 9.
[37] Historic England, *GPA:3*, p. 8.
[38] Historic England, *GPA:3*, p. 13.

"Setting is not itself a heritage asset, nor a heritage designation…"[39]

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

> ***"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".***[40]

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.[41]

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in ***Appendix 3***, the *NPPF* (at Paragraphs 201 and 202) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.[42]

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 201 to 203.[43]

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

> ***"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.***
>
> ***Examples of heritage benefits may include:***
>
> - ***sustaining or enhancing the significance of a heritage asset and the contribution of its setting***
> - ***reducing or removing risks to a heritage asset***

[39] Historic England, *GPA:3*, p. 4.
[40] Historic England, *GPA 3.*, p. 8.
[41] Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.
[42] DLUHC, *NPPF,* paras. 201 and 202.
[43] Including - Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor [2020] EWHC 2292 (Admin); DLUHC, *NPPF,* paras. 201 and 203.

- ***securing the optimum viable use of a heritage asset in support of its long term conservation."***[44]

Any "*heritage benefits*" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

[44] MHCLG, *PPG*, paragraph 020, reference ID: 18a-020-20190723.

Appendix 2: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.[45] It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 16 (2) of the Act relates to the consideration of applications for Listed Building Consent and states that:

> ***"In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."***[46]

Section 66(1) of the Act goes on to state that:

> ***"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."***[47]

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

> ***"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."***[48]

A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 version of the NPPF, the requirements of which are now given in paragraph 202 of the current, revised NPPF, see ***Appendix 3***), this is in keeping with the requirements of the 1990 Act.[49]

With regards to development within Conservation Areas, Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* states:

> ***"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."***[50]

[45] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.
[46] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 16(2).
[47] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).
[48] Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.
[49] Jones v Mordue [2015] EWCA Civ 1243.
[50] UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990. Section 72(1).

Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservations Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.[51]

[51] UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

Appendix 3: National Policy Guidance

The National Planning Policy Framework (September 2023)

National policy and guidance is set out in the Government's *National Planning Policy Framework* (*NPPF*) published in September 2023. This replaced and updated the previous *NPPF* 2021. The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

> ***"Plans and decisions should apply a presumption in favour of sustainable development.***
>
> ***For plan-making this means that:***
>
> ***a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;***
>
> ***b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:***
>
> ***i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or***
>
> ***ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.***

For decision-taking this means:

a. approving development proposals that accord with an up-to-date development plan without delay; or

b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."52

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

> ***"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change."[53] (our emphasis)***

The *NPPF* continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the *NPPF* as:

> ***"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."[54]***

The NPPF goes on to define a Designated Heritage Asset as a:

> ***"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."[55]***

---

[52] DLUHC, *NPPF*, para. 11.
[53] DLUHC, *NPPF*, para. 11, fn. 7.
[54] DLUHC, *NPPF*, p. 67.
[55] DLUHC, *NPPF*, p. 66.

As set out above, significance is also defined 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. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."***[56]

Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 195 that:

> ***"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."***[57]

Paragraph 197 goes on to state that:

> ***"In determining planning applications, local planning authorities should take account of:***
>
> ***a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
>
> ***b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
>
> ***c. the desirability of new development making a positive contribution to local character and distinctiveness."***[58]

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 199 and 200 are relevant and read as follows:

> ***"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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."***[59]
>
> ***"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. Substantial harm to or loss of:***

[56] DLUHC, *NPPF*, pp. 71-72.
[57] DLUHC, *NPPF*, para. 195.
[58] DLUHC, *NPPF*, para. 197.
[59] DLUHC, *NPPF*, para. 199.

a. ***grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***

b. ***assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."***[60]

Section b) of paragraph 200, which describes assets of the highest significance, also includes footnote 68 of the NPPF, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 201 reads as follows:

> ***"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:***
>
> a. ***the nature of the heritage asset prevents all reasonable uses of the site; and***
>
> b. ***no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
>
> c. ***conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
>
> d. ***the harm or loss is outweighed by the benefit of bringing the site back into use."61***

Paragraph 202 goes on to state:

> ***"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."***[62]

The NPPF also provides specific guidance in relation to development within Conservation Areas, stating at paragraph 206 that:

> ***"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."***[63]

---

[60] DLUHC, *NPPF*, para. 200.
[61] DLUHC, *NPPF*, para. 201.
[62] DLUHC, *NPPF*, para. 202.
[63] DLUHC, *NPPF*, para 206.

Paragraph 207 goes on to recognise that "*not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*" and with regard to the potential harm from a proposed development states:

> ***"Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."[64] (our emphasis)***

With regards to non-designated heritage assets, paragraph 203 of NPPF states that:

> ***"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."[65]***

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

> ***"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."[66]***

[64] DLUHC, *NPPF*, para. 207.
[65] DLUHC, *NPPF*, para. 203.
[66] DLUHC, *PPG*, paragraph 007, reference ID: 18a-007-20190723.

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

> ***"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.***
>
> ***While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm."[67] (our emphasis)***

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

> ***"When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape."[68]***
>
> ***"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."[69]***

It goes on to state that:

> ***"Well-designed places and buildings are influenced positively by:***
>
> - ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
> - ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
> - ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details - see Identity.***

[67] DLUHC, *PPG*, paragraph 018, reference ID: 18a-018-20190723.
[68] DLUHC, *NDG*, para. 46.
[69] DLUHC, *NDG*, para. 47.

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."[70]

[70] DLUHC, *NDG*, paras. 48-49.

Appendix 4: Local Policy

Wiltshire Core Strategy (2015)

The Historic Environment is directly referenced under *Core Policy 58: Ensuring the Conservation of the historic environment,* which states as follows:

> ***"Development should protect, conserve and where possible enhance the historic environment.***
>
> ***Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including:***
>
> ***i. nationally significant archaeological remains***
>
> ***ii. World Heritage Sites within and adjacent to Wiltshire***
>
> ***iii. buildings and structures of special architectural or historic interest***
>
> ***iv. the special character or appearance of conservation areas***
>
> ***v. historic parks and gardens***
>
> ***vi. important landscapes, including registered battlefields and townscapes.***
>
> ***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 potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping).***
>
> ***Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications."***

Appendix 5: 11-18, Saint Martins List Entry

Heritage Category: Listed Building

Grade: II

List Entry Number: 1243234

Date first listed: 21-Oct-1974

List Entry Name: 11-18, SAINT MARTINS

District: Wiltshire (Unitary Authority)

Parish: Marlborough

National Grid Reference: SU 19094 69381

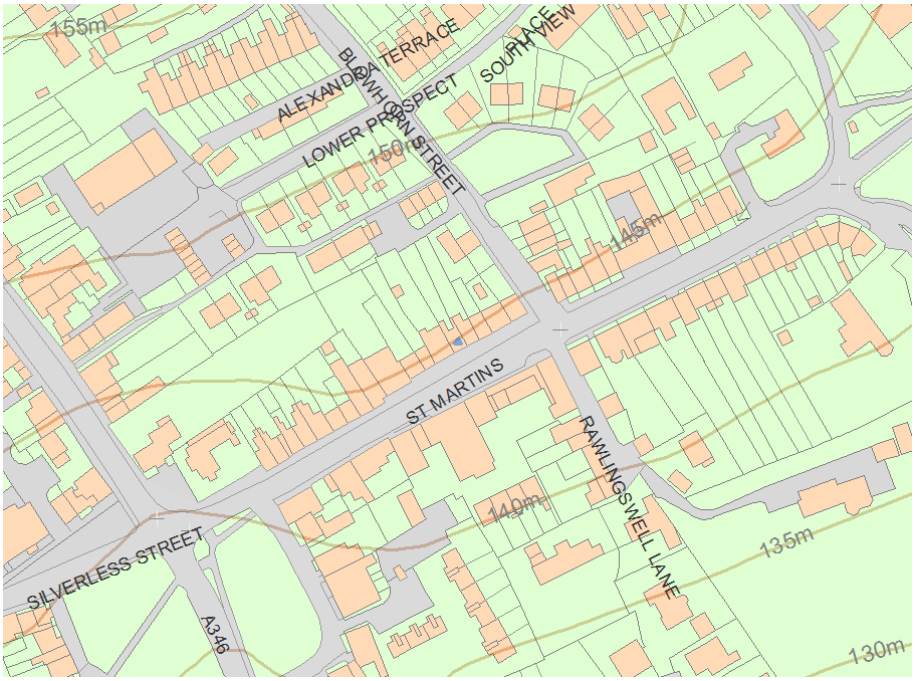
Details:

SAINT MARTINS 1. 5407 (North Side) Nos 11 to 18 (consec) SU 1969 1/89 II GV 2. C18. 2 storeys. Brick, some colourwashed. Old roofs. Some C18, mostly C19 casements and doors. Nos 6 to 28 (consec) form a group.

Listing NGR: SU1907869376

Legacy System number: 446883

Legacy System: LBS



End of official list entry

Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.
Registered office: 33 Sheep Street, Cirencester, Gloucestershire, GL7 1RQ
We are **ISO** certified **9001**, **14001**, **45001**

Pegasus_Group pegasusgroup Pegasus_Group

PEGASUSGROUP.CO.UK