

Wiltshire Council Planning Consultation Response

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Officer's Name: Jane Sanger
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Application No: PL/2025/08852
Repaint existing shopfront signage and place one internal decal with new business name
4 St Johns Street, Devizes, SN10 1BP

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.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 requires 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 214-216 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved. Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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."

Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping': A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

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.

Site and assets considered: The property is a Grade II listed building located in Devizes Conservation Area.

Proposal: The proposal seeks the repainting of the existing shopfront signage and the placement of one internal decal with a new business name.

Relevant planning history: K/50595/ADV - External illumination fascia signage. Two projecting signs.(refuse); K/80/0019/AD - Illuminated fascia sign; K/52357/LBC - Two non-illuminated fascia signs and two non-illuminated hanging signs (approve); K/10213/A - DISPLAY OF ILLUMINATED FASCIA SIGN AND NON-ILLUMINATED HANGING SIGN (approve); K/50627/LBC - Remove existing signs and replace with updated signage. (refuse); K/11014/A - ILLUMINATED PROJECTING SIGN. (refuse); E/09/1091/ADV - New signage scheme (approve); K/51200/LBC - Non illuminated fascia lettering and non illuminated projecting signs (approve).

Issues: impact on the significance of the listed building, impact on the setting of neighbouring listed buildings, impact on the character and appearance of the conservation area.

Information considered/provided: Paragraph 207 of the NPPF requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, whilst the applications are accompanied by a "Planning Statement" the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

However, paragraph 208 of the NPPF also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: 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.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

Assessment: Number 4 & 5 St John's Street occupies a prominent corner site at the junction of St John's Street and Wine Street, and was originally built in 1912 for Boots the Chemists by their in house architect, Michael Vyne Treleaven. The property is a Grade II listed building and is also located in Devizes Conservation Area.

The ground floor is modern, and most recently served as a bank and men's tailor's, while there are original residential premises on the two floors above, which are topped by a parapet and corner turret that features a scalloped copper dome and domed lantern.

The site has a notable rounded and recessed corner entrance with a heavy cornice projecting forward over its piers, decorated with original modillions (ornate brackets) and egg-and-dart moulding.

The proposal seeks to repaint the existing shopfront signage and place one internal decal with new business name.

It appears that the wrap around existing fascia would be removed and replaced with a series of 5 individual fascia signs above each window opening and the entrance door. Also, vinyl signs would be repeated in each window open, amounting to 12 additional signs on the shop front.

In conservation terms the number of signs is totally excessive and would detract from the architectural character and appearance of the listed building and the conservation area. In order to be acceptable, this needs to be much simpler, concise and limited in words, rather than cluttering the face of the shop front and fascia.

The wrap around fascia is preferred instead of individual signs which would give a faceted appearance to the fascia, where as the wrap around fascia integrates the shop front into one element.

Only one sign per elevation is considered acceptable for the fascia; ideally this should be limited to just the name of the business. Opening time can be shown in a vinyl sign near the entrance. Other information such as 'food, wine and grocery' is adding clutter and is unnecessary (this should be obvious through views into the shop unit).

The vinyl stickers are considered unnecessary and repeating information, again adding visual clutter.

NB: In terms of signage, less is generally more, in terms of impact. A proliferation of signs tends to be self-defeating.

In addition, a Listed Building Consent application will be required for these works.

Summary & conclusion: The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It

makes clear that any harm to a designated heritage asset requires clear and convincing justification.

The proposals will result in harm to the building via detracting from the original external form of the building. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they would compromise the architectural appearance of the building and the character and appearance of the conservation area. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act and the special attention by Section 72 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 208 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 excessive number of signs. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.