

Wiltshire Council Planning Consultation Response

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Wiltshire Council Conservation (Central)

Officer's Name: Jane Sanger
Officer's Title: Planning Officer

Application No: PL/2025/08890
**2no Dormers to Side Elevations and Removal of Outbuilding
Saxon, Castle Grounds, Devizes, SN10 1HL**

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 66 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 bungalow is a modern unlisted building located in the Castle Close within Devizes Conservation Area.

Proposal: The proposal seeks two large dormers and the demolition of an outbuilding.

Relevant planning history: K/81/0629 - First floor store room (approve); K/10373 – First Floor Store Room (approve);

Issues: 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 application is accompanied by a "Statement of Significance and Impact" the document provides limited information about the building, it fails to provide any objective assessment of the impact of the proposals on the setting of the listed buildings and the character and appearance of the conservation area, 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.

The location of the property is important as it is located at the gateway to the castle close and the scheduled monument. Individual buildings of architectural and historic interest line the full length along both sides of St John's Street. To the west is the access to the Castle although the Castle itself is hidden from this view. The significance of the individual buildings lies largely with their historic fabric and architecture - 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: The property is a unimposing bungalow of little architectural presence and makes no positive contribution to the character and appearance of the conservation area. The property is located directly behind rear garden of listed building along St John's Street and forms part of the gateway to Devizes Castle.

The proposal seeks the removal of an outbuilding along the southern boundary of the site and the erection of two large box dormers on the roof slope of the existing bungalow.

There is no objection to the loss of the outbuilding since this is largely modern apart from a small section of red brick outbuilding which has been heavily altered.

However, I have significant concerns at the impact of the proposed dormers since these are large flat roofed box dormers which would totally dominant the existing low pitched roof form of the existing bungalow.

The design of the dormers would be highly intrusive to the significance of the heritage assets and would have a harmful impact on the setting of neighbouring listed buildings and the character and appearance of the conservation area.

The design of the dormers is so poor that they would not even be acceptable outside of a conservation.

A dormer with a flat roof which extends from eaves to the ridge of the roof is not considered good design and is likely to be rejected. The dormers would have an unbalancing effect on the existing property. Dormers with a horizontal emphasis and flat roofs should always be avoided.

I point out, that there is a legislative requirement for proposals to preserve or enhance the setting of listed buildings, and to preserve or enhance the character and appearance of a conservation area. This proposal would have a harmful effect on the significance of all designated heritage affected by this proposal.

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 setting of neighbouring listed buildings and the character and appearance of the conservation area through two large box dormers on the existing host building which would constitute poor design which would have a harmful impact on the designated heritage assets. The proposals involve only part of the setting of the listed buildings and the boundary of the conservation area and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF. Indeed, the wording of the NPPF and the 'special regard' by Section 66 and '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 works and the proposals are articulated as being primarily for the convenience of the occupants i.e. a private benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.