

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/00284
Replace all existing softwood windows with uPVC framed units. Ground Floor Flat No's 1 to 14 incl. First Floor No's 22 to 31 and 33 to 36. Second Floor Flat No's 44 to 46. All Ground Floor and First Floor communal areas
Crammer Court, Church Walk, Devizes, SN10 3AW

Please find following comments in respect of the above application(s).

Recommendations:

☐	Comment
☐	Support
☐	Support subject to conditions (please 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 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.

The Council's Core Strategy 'Core Policy 58: Ensuring the conservation of the historic environment' requires that designated heritage assets and their settings will be conserved and where possible enhanced. It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

Site: The building is a modern block of 2/3 storey flats located within Devizes Conservation Area opposite to St James Church, a Grade II* listed building.

Proposal: The proposal seeks to replace all existing softwood windows with uPVC framed units. Ground Floor Flat No's 1 to 14 incl. First Floor No's 22 to 31 and 33 to 36. Second Floor Flat No's 44 to 46. All Ground Floor and First Floor communal areas.

Relevant planning history: PL/2023/02466 - Replacement windows to four flats on the second floor from timber windows to triple glazed UPVC (approved); PL/2025/07220 - Replace all existing softwood windows with uPVC framed units. Ground Floor Flat No's 15 to 21 incl. First Floor No 32 and No's 37 to 43 incl, plus all Ground Floor and First Floor communal areas (approved).

Issues: Impact on character and appearance of conservation area; impact on setting of listed building.

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 "Design & Access Statement" the document provides limited information about the building and fails to provide any objective assessment 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 area lies largely with its historic buildings and spaces – the architecture, building form, layout, architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character and appearance of the conservation area.

Assessment: The property Crammer Court lies half within Devizes Conservation Area, with the other half of the building outside the conservation area, however effecting its setting.

The proposed works are to replace the existing timber windows with upvc in the half of the building which lies inside the conservation area. No other additional works will be carried out other than the

window replacements. In an attempt to create a consistent look and replicate the other timber windows on the block, timber effect white upvc windows with cut joints are proposed in order to look like the existing timber windows and retaining the existing colour and character of the building.

Whilst this part of the building is inside of the conservation area, and the use of UPVC would normally be unacceptable, for the sake of a unified appearance of the building there is no conservation objection.

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 impact of the proposals on heritage assets will be neutral and the requirements of current conservation legislation, policy or guidance are considered to be met and there is therefore no objection to the approval of the application.