

APPLICATION FOR LISTED BUILDING CONSENT

OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2025/09422
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	30 High Street, Marlborough, SN8 1LW
DESCRIPTION OF WORKS:	Installation of structural steel to replace rotten timber beam supporting first floor rear roof gable with associated works.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

No. 30 High Street is a grade II listed building dating from the 18th century. Despite various modern alterations, such as the modern shop front, the building generally retains a timber framed core and traditional detailing. The second floor retains the most historic fabric, complete with surviving staircase from first floor, and floorboards, as it has not been subject to the same level of internal alteration as the ground and first floors. The building overall provides a positive contribution to the character and appearance of the Marlborough Conservation Area.

The list description states, for means of identification purposes only, the following:

C18. Red brick. Pitched old tile roof, with overhanging eaves. 2 storeys and attics. Ground floor has 1 modern shop front, and 1 oblong C19 bay shop front. 1st floor has 2 cased sashes with glazing bars. 1 attic dormer with pitched roof, tile-hung cheeks, and casements with lead glazing bars. Nos 30 to 38 (consec) form a group.

PROPOSAL

Installation of structural steel to replace rotten timber beam supporting first floor rear roof gable with associated works.

RELEVANT PLANNING HISTORY

Proposal / Summary
K/11833/L - Listed building consent Decision - Approve with Conditions Date: 4/8/1988 – REPOSITIONING OF FRONT ENTRANCE DOOR AND REMOVAL OF SOME INTERNAL WALLS.
K/11834 - Full planning permission Decision - Approve with Conditions Date: 4/8/1988 – REPOSITIONING OF FRONT ENTRANCE DOOR
K/16751 - Full planning permission Decision - Approve with Conditions Date: 6/12/1990 – SINGLE STOREY EXTENSION
K/16752/L - Listed building consent Decision - Approve with Conditions Date: 6/12/1990 – INTERNAL ALTERATIONS AND SINGLE STOREY EXTENSION
K/17499 - Full planning permission Decision - Approve with Conditions Date: 26/6/1991 – REMOVAL OF EXISTING TIMBER FASCIA SIGN; INSTALLATION OF NEW ENTRANCE DOOR AND SIDE PANEL.

K/17503/L - Listed building consent Decision - Approve with Conditions Date: 26/6/1991 – SINGLE STOREY REAR EXTENSION, AMENDMENT TO INTERNAL LAYOUT, NEW ENTRANCE DOOR AND SIDE PANEL, REMOVAL OF EXISTING FASCIA SIGN
K/17541 - Full planning permission Decision - Approve with Conditions Date: 4/7/1991 – NEW TIMBER FASCIA SIGN, NEW ENTRANCE DOOR AND SIDE PANEL
K/17544/L - Listed building consent Decision - Approve with Conditions Date: 4/7/1991 – NEW TIMBER FASCIA SIGN, NEW ENTRANCE DOOR AND SIDE PANEL
K/76/0319 - Full planning permission Decision - Approved Date: 5/7/1976 – Extension on rear to provide storage accommodation to offices
K/16812 - Lawful development: Proposed use Decision - Approved Date: 11/12/1990 – CHANGE OF USE FROM INSURANCE OFFICE TO LICENSED BETTING OFFICE
PL/2024/01368 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 3/4/2024 – Comprehensive repair and refurbishment of building externally and internally, including removal of non-original internal partition walls, repair and replacement of defective floorboards, removal of previous tenants hanging sign on front elevation, repair
PL/2025/01855 - Removal/variation of conditions Decision - Withdrawn by Council Date: 17/3/2025 – Comprehensive repair and refurbishment of building externally and internally, including removal of non-original internal partition walls, repair and replacement of defective floorboards, removal of previous tenants hanging sign on front elevation, repair
PL/2025/02671 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 12/5/2025 – Comprehensive repair and refurbishment of building externally and internally, including removal of non-original internal partition walls, repair and replacement of defective floorboards, removal of previous tenants hanging sign on front elevation, repair
PL/2025/06163 - Listed building consent (Alt/Ext) Decision - Withdrawn by Council Date: 11/11/2025 – Extractor Fan and Kitchen Setup; Air condition set up; CCTV Camera set up (Internal); Internal decoration/ set up for dining restaurant
PL/2025/06330 - Approval of details reserved by a condition – Discharge of condition 3 construction of the new wall, of planning application PL/2024/01368 (Comprehensive repair and refurbishment of building externally and internally, including removal of nonoriginal internal partition walls, repair and replacement o

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Legislation

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 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.

National Policy and Guidance

The National Planning Policy Framework (NPPF) sets out government policy, including 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 213-215 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 to 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.

Historic England Advice Note 2: Making changes to Heritage Assets, illustrates the application of policies set out in the NPPF in determining applications for LBC (and planning permission).

Wiltshire Core Strategy:

Whilst not directly relevant to listed building consent applications, the below policies give an indication of the Council's approach to development affecting heritage assets:

- Core Policy 57 '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.
- Core Policy 58 '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."

ISSUES

- Impact upon the preservation of the listed building or its setting or any features of special architectural and/or historic interest.

CONSULTATION RESPONSES

Marlborough Town Council – no objections.

REPRESENTATIONS

- Internal works to Grade II

In accordance with the requirements of Section 5(3)(a) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) publicity is not required for listed building consent to carry out works affecting only the interior of a Grade II (unstarred) listed building.

ASSESSMENT

In accordance with Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has been given to the significance of the listed building, including its

architectural and historic interest, and the desirability of preserving both the building and its setting. Relevant policies within the National Planning Policy Framework (NPPF), particularly Section 16: Conserving and Enhancing the Historic Environment, have also been taken into account. These policies require that any harm to the significance of a designated heritage asset must be clearly justified and weighed against the public benefits of the proposal.

In order to be acceptable, the application needs to be assessed against the following criteria:

Information considered/submitted

Paragraph 207 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.

- Design and Access Statement & Heritage Statement

The submitted statement contains minimal information and no real statement of significance (only referring to the list description, which is for means of identification purposes only) and the assessment of impact is brief.

Paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis:

Assessment of significance:

According to the National Planning Policy Framework (NPPF), significance is 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.”

Historic England further categorises significance into four key values:

- *Evidential* – the potential of the asset to yield evidence about past human activity.
- *Historic* – the ways in which the asset illustrates aspects of history.
- *Aesthetic* – the sensory and design qualities of the asset.
- *Communal* – the meanings and associations attached to the asset by people.

In this case the significance of the building lies largely with its vernacular construction and survival of traditional materials and construction methods. Its timber frame core, with wattle and daub internal elevation, and surviving features such as the staircase from FF to SF and original floorboards and joinery.

Impact of proposals on the significance and setting of the building/structure:

Understanding the impact of proposed works on a listed building requires a careful and proportionate assessment of how those changes affect the asset’s heritage significance and its setting. This includes both the physical alterations to the building itself and any changes to its spatial or visual relationship with surrounding structures or spaces.

The significance of a heritage asset is not static; it is shaped by its architectural, historic, and communal values, and by how these are experienced in context. Therefore, any intervention must

be considered in light of the asset's identified significance, with attention given to both potential harm and benefits. Benefits may include repairs that support the long-term conservation of the building, improved energy performance, or enhanced public access and understanding.

This assessment is grounded in the statutory duty under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special regard to be given to the desirability of preserving the building and its features of special interest. It is also informed by national policy, particularly paragraphs 199–208 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The site has been subject to a major refurbishment programme since 2024 (ref. PL/2024/01368), which has, unfortunately, uncovered various structural issues as the project has progressed. Some structural support was agreed under application ref. PL/2025/02671. Discussions with the Agent and Structural Engineer have been ongoing throughout the project, and the issues subject to this application were uncovered after the approval of the previous application, with the Agent informing the Council of the situation (complete with Structural Engineer's recommendations in July 2025). A site meeting was undertaken on the 19th August 2025, and due to the urgency of the works, the existing situation and the approved works, it was in the building's best interests if works could continue on the understanding that the application for LBC was forthcoming. The application was finally submitted on the 1st December 2025, but not validated until January 2026.

The building has evidence of past structural intervention in the form of some supporting steel beams and blockwork, with structural intervention and alterations dating from the c.1980s. In early 2025 an application was submitted to cover the elements within the 2024 application, but expanded to include additional structural works to the building: this was due to the discovery of rotten timbers. The proposal included the replacement of a timber partition wall on the first floor as it was discovered to be partially rotten and failing to hold the load of the building – this may be due to a combination of factors – the wall is below the roof valley and taking the load of two roof slopes above; water ingress from above due to the lead-lined valley above, and previous removal of partition walls within the building in the 1980s.

In relation to application ref. PL/2025/02671, there was evidence, such as cracking and deflection of timbers, that required attention and the structural engineer's drawings illustrate where existing timber and/or steel supports required replacing or additional support was required. A higher number of degraded timbers were also uncovered than previously anticipated, which were no longer fit for purpose and required replacing. The additional structural works therefore included additional timber frame repairs, and the replacement of rotten timbers (as identified on the proposed plans), and rebuilding existing blockwork partition walls and structural support columns.

The current application is essentially a minor addition to the works already approved under the 2024 and previous 2025 applications (PL/2024/01368 & PL/2025/02671) as result of finding further structural instability within the building after works had commenced in relation to the previous consents.

Previously approved additional structural steels were proposed to be installed on the existing flank wall. Following further investigation, it came apparent the existing wall is not sufficient for the above building loadings. Subsequently the Structural Engineer confirmed an additional column is required at ground floor level to support the above buildings loadings. This is an

addition to the structural works already approved, and no alterations to those proposals are required in order to install the column. The existing floor is concrete and therefore if this needs to be redone to secure the footings for the new column, this can be achieved with little impact on the building.

Whilst the proposal sees the installation of additional steelwork, the requirement is to ensure the structural integrity of the building, thus securing its future as a designated heritage asset in active use within the town. The siting of the column has enabled the wattle and daub wall to remain undisturbed and preserved in situ, whilst ensuring that essential structural integrity is achieved. As already stated, the building already has a degree of structural intervention, some of which dates from the 1980s. The building has been suffering from insufficiently supported loading for a number of years, most likely due to the removal of internal walls at various points in the later 20th century.

The structural works will ensure the structural integrity of the listed building, safeguarding its viability and securing its optimal viable use. This is in the building's best interests, and a public benefit to retain an active shop/commercial premises within the town.

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.

Whilst it is unfortunate that additional structural support has been identified as necessary, on top of those works already approved, it is accepted that it is required to preserve the building. The works have been carefully considered to limit the impact additional impact on the building, as such any harm is considered less than significant, and it is in the public interest to save this listed building.

A recent consent has accepted an increased level of intervention to replace defective timbers and install a structural steel support, the intervention is necessary to enable the identified structural works to secure the structural integrity of the building. The insertion of the column will not require any additional intervention into the building's fabric, and whilst additional steelwork is unfortunate, securing the building's structure is essential to prevent the building becoming a dangerous structure. With the long-term interest of the building at stake, a small degree of harm can be justified in order to provide overall structural stability.

In this case the proposals will also result in considerable heritage benefits by virtue of the proposed investment in repair and upgrading/structural repair which will help to secure the future/stability of the building /via facilitating the optimum viable use.

RECOMMENDATION:

That Listed Building Consent be GRANTED, subject to the following conditions:

- Time limit
- Approved plans