

Wiltshire Council Planning Consultation Response

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(South/West)

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Application No: PL/2026/01683 PP and PL/2026/01862 LBC
32 Market Place, Warminster, BA12 9AN
Conversion of rear part of existing GF commercial unit to form residential flat, retention of commercial unit to front portion of ground GF. Construction of single dwelling on hard standing area to rear of 2 Market place, including landscaping and amenities.

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

Recommendations:

x	No comment (in relation to the proposed flat within the LB)
	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

Summary

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. Sections 16 (LBC) and 66 (PP) require 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.

Paragraph 58B of the Planning Act 1990 require that in considering whether to grant planning permission or permission in principle for the development of land in England which affects a registered park and garden, the LPA must have special regard to the desirability of preserving or enhancing the asset or its setting.

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 214-16 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.

The following points are taken from the Historic England document "The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3" (HE GPA3) that are considered to be particularly relevant:

HE GPA3 Part 1:

"The NPPF makes it clear that the setting of a heritage asset is 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."

"The extent and importance of setting is often expressed by reference to visual considerations. ...views of or from an asset will play an important part..."

"While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time."

"The importance lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance."

Other HE publications

[Traditional Windows: their care, repair and upgrading](#)

HE GPAs and HEANs [The Planning System | Historic England](#)

Site and assets considered:

32 Market Place is a grade II listed building, together with number 34 (Barclays Bank). They were listed in March 1978. The list entry (a means only to identify the heritage asset) reads as follows:

'Probably mid C19. 3 storeys, breaking forward with No 36. Stone with rusticated ground floor treatment and ashlar upper part with rusticated quoins. Moulded string under ground floor windows and under 2nd floor windows, moulded and bracketed stone cornice, returned to left and right. Upped tiled roof. 2 ranges of windows, with architrave surrounds and cornice on scroll brackets to upper floors, single hung glazing bar sashes 2nd floor, plate glass sashes with marginal glazing on 1st floor. 3 bay bank treatment on ground floor having Doric pilasters and moulded cornice over fascia. Return elevation to west has paired outer windows flanking central window.'

The buildings are in the Warminster conservation area.

Proposal:

Conversion of rear part of existing GF commercial unit to form residential flat, retention of commercial unit to front portion of ground GF. Construction of single dwelling on hard standing area to rear of 2 Market place, including landscaping and amenities.

The proposals relate to the rear of the existing building and the rear plot



The planning statement says:

'The scheme as proposed seeks to erect a new dwellings to the rear of the existing building and a new flat at the rear of the ground floor, currently commercial'.

Note: the new flat at the rear of the ground floor is within the listed building.



Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided:

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.

In this case, the applications are accompanied by a 'Planning Statement, Heritage Assessment and Flood Risk Assessment' undertaken by the agent. The statement notes that the bank is mid 19th century and likely is constructed on the site of a previous building (almost certainly) and that there is '*some possible earlier masonry visible in the basement*'.

The document fails to mention that the plot is almost certainly a former burgage plot.

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, I assess the significance (in so far as I am able to without access/photos etc) to be:

The architecture of the building – being particularly 'grand' and classical in style;

That it is a 19th bank which tend to be particularly elaborate/decorative

A likely high ceilinged ground floor (front);

High quality materials such as stone (decorative) and slate?;

A prominent position within the high street;

That the side elevation is decorative, indicating this was intended to be visible within the public realm;

That it occupies a long narrow plot which indicates (evidential) its likely medieval origins (ie a burgage plot);

That the rear elevation is attractive, retaining three multi-pane timber sash windows.

Following a site inspection (external only), the rear building is historic with historic features.



The close boarded fence and drive gates are unattractive features.

Assessment:

New building to the rear of the plot

There is an attractive outbuilding (34a), converted to residential, to the rear of number 30. Presumably this has guided the design? One hopes so as it makes a positive contribution to the setting of the LB and the CA.

I have no objection to the proposed new building which is modest in scale (in keeping with the general character of development in burgage plots which steps down in scale). The design is traditional in character, reminiscent of a historic outbuilding (34a). There seem to be rather too many rooflights though, which would detract from an attractive roofscape.

However, a clay tile is proposed together with brick detailing and stonework for the elevations (interested to know what stone they propose?). I also assume that ALL the elevations will be brick and stone. Subject to approving materials, windows, doors and RLS, I have no objection.

In terms of its siting, I note that it is set away from the neighbouring building, allowing for a form of access to the paired double doors. This is welcomed.

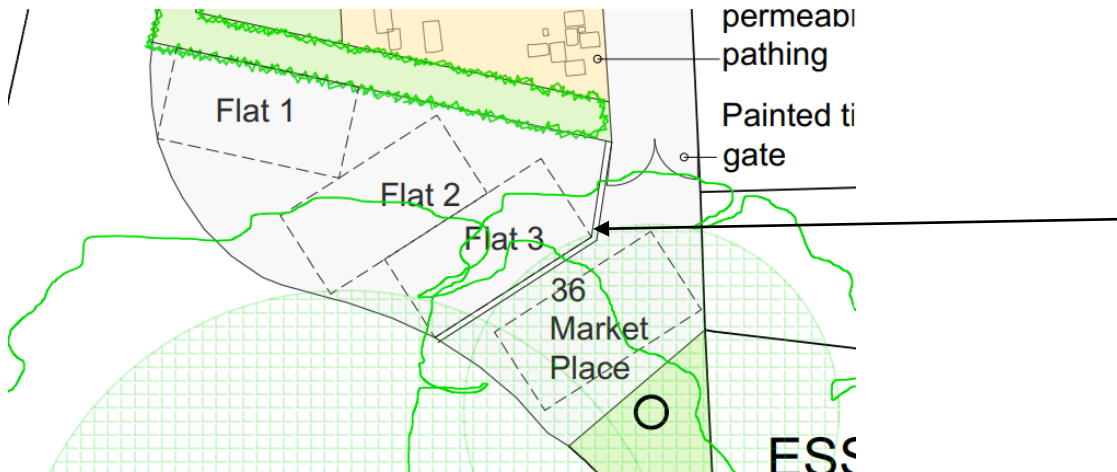


Landscaping

The horse chestnut and yew make a strong positive contribution to the character of this part of the CA. Please ensure the tree officer is consulted and is happy that the development will not harm the trees.

In respect of new boundaries, a hedge and paving is proposed. Given this is an 'urban' environment, the proposed hedge treatment seems wrong for this setting. I would recommend estate-style fencing with a hedge planted to the rear perhaps. Please do not support close boarded fencing, and indeed, I welcome the proposed removal of the timber fencing at the corner of the existing building.

However, the proposed site plan suggests some fencing? Estate-style railings would be preferable.



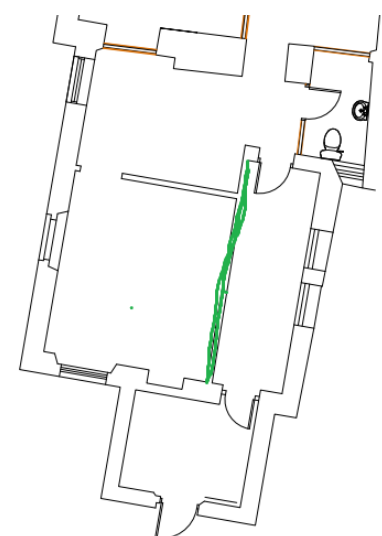
Proposed flat 4

In respect of the flat, ONLY an existing and proposed ground floor plan is provided (no photos or internal elevations).

The proposals appear to have minimal structural impacts (the agent should be asked to confirm), the only issue of possible concern appears to be the blocking of a doorway at the bottom of the stairs (photo of this door please). Also, the subdivision of the easterly room to form a shower room and cupboard. What does this room look like? Photos please.

Also a partition is removed (highlighted below). What is this constructed from and what does the floor in this whole rear area comprise of?

No information is provided on possible works to meet Public Protection requirements or Building Regs (ie fire separation at ceiling level and between the commercial and residential spaces). I would suggest the agent is asked to clarify these potential impacts and that existing windows/door will be retained (they would require consent to alter them).



Existing Ground Floor

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.

I consider that, providing high-quality traditional materials are employed, including in respect of the landscaping, and that the two trees are unharmed by the development, the proposed new residential unit would not have an adverse impact on the setting of the LBs or the conservation area.

In respect of the new flat, there is currently insufficient detail to persuade me that the proposals would not harm the significance of the listed building. I recommend that the agent is required to provide a greater level of detail including internal photos (labelled and cross referenced to a numbered floorplan).

If you are minded to approve the applications, I recommend the following conditions:

That no windows or doors will be replaced unless agreed with the LPA;
That new windows and doors will be timber and details shall be provided;
That a sample panel of the proposed stone and brick shall be constructed on site for approval of LPA (particularly the stone);
Any new rainwater goods for the new dwelling shall be black and 'Heritage style';
Rooflights shall be conservation rooflights and details shall be supplied;
No close boarded fences shall be erected;
Details of the new hard landscaping shall be provided.