

APPLICATION FOR FULL PLANNING PERMISSION

CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/09951
APPLICATION TYPE:	Full Planning Permission
SITE ADDRESS:	HSBC, 2 Market Place, Chippenham, SN15 3HE
DEVELOPMENT DESCRIPTION:	Alterations to the ground floor frontage, removal of redundant banking features, replacement of windows, alterations to the former bank vault, reinstatement of the rear of the existing building at ground floor and creation of a small rear courtyard, together with associated works.
RECOMMENDATION:	Consent be GRANTED

PROPOSAL

The scheme is requesting permission for operational development at former HSBC premises in Chippenham. The operational development proposed includes:

- Replacement of existing windows and installation of new windows
- Replacement of external staircase
- Minor demolition and rework to rear elevation to create an external courtyard

Following concerns raised regarding visual impact, during the consultation period, revised plans were requested and ultimately accepted on 13.03.2026. An addendum to the planning, design and access statement providing a written response to concerns raised was also accepted on 13.03.2026.

Following revisions, materials are proposed as:

- Timber sliding sash windows
- York stone walls to ground floor and first floor front elevation
- Bath stone walls to second floor and third floor front elevation
- Roughcast render walls to primary section of rear elevation
- White pre-pigmented render walls to rear single storey
- Natural slate roof except for EPDM roof to rear single storey
- Stained timber door to front elevation
- Composite door to rear elevation
- Moulded soffits and fascias
- Cast iron black gutters and downpipes to front elevation
- UPVC cast iron effect gutters and downpipes to rear elevation

Surface water and foul sewage are proposed to be disposed of via main sewer; the scheme has been notified as meeting the BNG de minimis exemption for development under 25m2.

THE SITE

The application site is a stone built 2.5 storey building '2 Market Place' in Chippenham, a principal settlement which benefits from a made neighbourhood development plan (NDP). The site was most recently occupied by HSBC and has an existing planning use of commercial, business and service (Class E) to the ground floor and residential to other floors.

The site is wholly within the Chippenham Conservation Area (CA), which benefits from a made CA character appraisal, categorising the site as being within 'character area 14: Market Place'. Neighbouring 'the old bakehouse to rear of number 3' is Grade II listed and there are other buildings near the site which have the same (or higher) listed grade value. Whilst the site is not formally designated, it has been identified as a non-designated heritage asset (NDHA) worthy of retention.



Figure 1: Map view of site (red)



Figure 2: Aerial view (2024) of site (red)



Figure 3: OS mapping (1888-1915)

There is some off-street parking to the rear (west) of the building, accessed via a public carpark connected to unclassified 'gladstone road'. There is pedestrian access via a pavement adjacent to classified c-road 'Market Place' off of classified c-road 'High Street'. The site is highly visible from all these publicly accessible locations.

The site, and wider area, are identified by the Environment Agency (EA) as being in Flood Zone 1, the lowest risk of flooding from rivers or seas, and is not at high risk of flooding from groundwater or surface water sources.

RELEVANT PLANNING HISTORY (inter alia)

Relevant to the site and scheme:

- PL/2026/00068 *APPLICATION FOR PRIOR APPROVAL FOR THE CHANGE OF USE OF FIRST FLOOR FROM CLASS E TO RESIDENTIAL USE* was granted on 17.02.2026
- PL/2023/00444 granted permission for the *Vacation of premises and externally removal of external ATM, signage and CCTV. Internally removal of componentry, equipment and marketing* on 20.02.2023
- PL/2025/06982 granted prior approval for the [...] *Change of Use of the Commercial Second and Third Floors to Residential Use (to provide 4 Units) and Access via First Floor* on 26.11.2025

Relevant planning history near the site:

1 Market Place:

- PL/2023/02655 approved an *Application for prior approval for the proposed change of use of a commercial building to residential use (comprising 7 residential units)* on 05.06.2023

49 Market Place:

- PL/2025/03775 approved *Proposed change of use of two upper floors (first floor and second floor) from commercial banking use to 2 self contained apartments including associated internal alterations* on 16.06.2025

St Pauls House, 1 Marshfield Road:

- PL/2025/01319 approved *Change of use of existing vacant commercial building (Use Class E) to create 24 residential dwellings* on 01.04.2025

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Though considered as a whole, relevant Development Plan policies are listed below along with applicable legislation and guidance.

Wiltshire Core Strategy (WCS)

- CP41: Sustainable Construction and Low Carbon Energy
- CP50: Biodiversity and Geodiversity
- CP57: Ensuring High Quality Design and Place Shaping
- CP58: Ensuring Conservation of the Historic Environment
- CP60: Sustainable Transport
- CP61: Transport and New Development
- CP62: Development Impacts on the Transport Network
- CP64: Demand Management
- CP67: Flood Risks

Saved Policies of the North Wiltshire Local Plan (NWLP)

- NE18: Noise and Pollution

Chippenham Neighbourhood Development Plan (NDP)

- SCC2: Sustainable Design and Construction
- GI1: Protecting and Enhancing Biodiversity
- TC4: Development within Chippenham Conservation Area
- TC6: Design of Shopfronts

Wiltshire Local Transport Plan 4 (LTP4)

- Parking Standards (LTP3)

Wiltshire Design Guide (WDG)

Chippenham Design Guide (CDG)

Chippenham Shop Front Design Guide (CSFDG)

Chippenham Conservation Area Character Appraisal (2023)

- Area 14: Market Place

Chippenham Conservation Area Management Plan (2010)

- Part 2: Conservation Area Management

ISSUES

The main issues in the consideration of this application are:

- Principle / Sustainable Development
- Impact on Heritage Assets
- Design and Impact on Neighbouring Amenity
- Biodiversity / Geodiversity

CONSULTATION

Chippenham Town Council: Object

The Town Council is disappointed that the Applicant has gone ahead with inserting a first floor at the front of the building and disregarded previous concerns raised about the loss of the important double height space at the front of the building associated with the full height windows, the grandeur of which provides a key positive contribution to the significance of this non-designated heritage asset. As it is, this important space is now lost and decreases the attractiveness of the ground floor offer for future retailers, including cafes and restaurants which often choose historic premises with double height space and with lots of natural light.

CP57 of the Wiltshire Core Strategy at criterion (iv) requires development to be sympathetic to, and conserve historic buildings, and criterion (xii) requires the use of high standards of building materials and finishes. CP58 of the Core Strategy states that development should protect, conserve and enhance the historic environment. Designated heritage assets should be appropriately enhanced in a manner appropriate to their significance. Chippenham Neighbourhood Plan (CNP) Policy TC4 explains that development within Chippenham Conservation Area will be permitted where it preserves or enhances the special character or appearance of the Conservation Area amongst other things. It also states that in considering proposals for development within the Conservation Area full regard must be given to the relevant character area analysis in the Chippenham Conservation Area Character Appraisal (2024). CNP Policy TC6 explains that proposals for altered shopfronts should have regard to the design advice in the Shopfront Design Guide (Annexe 3). One of five key principles in the Shopfront Design Guide is that 'The character and appearance of buildings and Chippenham Conservation Area, should be preserved or enhanced by the implementation of well-designed shopfronts using appropriate, high quality materials.'

The Chippenham Conservation Area Character Appraisal (2024) notes on p. 140 that 'No. 2 (HSBC), although a narrow building, has an imposing ionic classical ground floor frontage befitting a bank and is a key positive feature of the space.' It is also identified as a 'Building of Good

Townscape Merit' in the Appraisal. Enhancement Proposal 11 in the Chippenham Conservation Area Management Plan SPG is to 'Encourage the HSBC Bank to relocate its cash machine and safe to enable the restoration of the window openings to their original appearance.' Hence the building is a non-designated heritage asset that positively contributes to the character and appearance of the Conservation Area through its front façade, the full height windows of which play an important role in its significance.

Whilst there is no objection in principle to the replacement of the existing front ground floor windows with new timber framed windows, each window must remain as one glazed piece so as not to harm the significance of the heritage asset and Conservation Area. The submitted plans do not provide sufficient clarity that the windows are one piece, with each window shown to have two opening lights. There are also concerns regarding the way the new first floor crosses these windows and the crude effect this might have on the appearance of the building from the street. There are no details to show what finish or material is proposed where the new first floor intersects the windows and what this would look like from the street. Detailed joinery plans should be submitted upfront to have confidence as to what is being proposed. The proposals to drop the two windows and remove the safe are supported and consistent with Enhancement Proposal 11 in the Management Plan and criterion f) of CNP Policy TC4 to secure the enhancement proposals for the relevant character area in the Conservation Area Management Plan SPG (providing the windows are restored to their original appearance as per the point above).

The removal of bars to windows at the rear is welcomed and supported. However, the replacement windows proposed at the rear should be timber framed given that they are visible from the public realm in Borough Parade car park, and should be of a high quality design that makes a positive contribution to local character and distinctiveness (which UPVC windows do not) in accordance with criterion b) of CNP Policy TC4.

Finally, there are concerns regarding the creation of a 'self-contained unit' at the rear of the premises and the resulting loss of ground floor retail space for the main unit, which could harm its viability and future attractiveness to a retail operator. It is not known what the purpose of the self-contained unit would be, but creating a new commercial public frontage here would not respect the built form of the area and would be contrary to urban design principles and CP57 of the Wiltshire Core Strategy. The floorspace currently occupied by the vault should remain either physically linked to the main building, or there should be doors incorporated on either side of any new external courtyard to provide for easy access between these spaces.

Given the above, the proposed development would harm the significance of the non-designated heritage asset of No. 2 Market Place and the designated heritage asset of Chippenham Conservation Area, and would therefore be contrary to CP57 and CP58 of the Wiltshire Core Strategy, Policies TC4 and TC6 of the Chippenham Neighbourhood Plan and accompanying Chippenham Conservation Area Character Appraisal, and advice in the NPPF.

Councils Conservation Team: No Comment

The development does not lie within our consultation remit and in view of the need to be selective in what can be given consideration by this team to allow us to focus on cases where we can add most value, we have not examined this proposal in detail and do not intend to comment. This should not,

however, be construed in any way as implying approval or endorsement of the proposal. If assessment indicates that detailed conservation input is required please re-consult us.

Officer note:

Following revisions sent on 13.03.2026, the TC were re-consulted for the period 23.03.2026 to 13.04.2026. No revised representation was received during this extended consultation period.

Furthermore, whilst the prior approval assessment made under PL/2026/00068 did not include matters relating to impact on the CA setting (by virtue of the development not meeting the thresholds for such assessment) the Councils Conservation Team provided the following representation, which is being shared under this application as (in lieu of a scheme specific representation from the team) it provides some guidance relevant to assessment of development at this site:

Given the site is not listed the key considerations in this case would be the impacts of the work on the Character and Appearance of the Chippenham Conservation Area.

Exploring the submitted information I am unable to deduce any significant changes to the elevations of the building associated with the proposal, and conclude that there would be no visual change to the character and appearance of the Conservation Area.

In the conversion of the upper floors of the building to residential, there would be a change in the character of the locality due to the proposed use and the change in patterns of behaviour in the locality. In the business use the building is more active during the working day and not used after hours. The residential use could mean the reverse in that increased use in the evenings and weekends and less activity during working hours.

One must also consider the benefits of the Proposal - the site is an attractive building in the Conservation Area, the proposed reuse of the site will help to secure the longevity of this undesignated Heritage Asset.

REPRESENTATIONS

At the time of writing, no public representations have been received.

ASSESSMENT

Principle / Sustainable Development

CP1 and CP2 of the WCS relate to the spatial strategy for Wiltshire, setting the policy foundations for sustainable development within the county. CP10 of the WCS expresses that development in the Chippenham Community Area should be in accordance with the Settlement Strategy set out in CP1.

The scheme proposes operational development to support existing and permitted use of the site; development in connection with those uses is established in principle.

Impact on Heritage Assets

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a duty on Local Planning Authorities (LPAs) to pay special attention to the desirability of preserving or enhancing the character or appearance of listed buildings and CA's (respectively) in exercise of planning functions.

Policy CP57 of the WCS requires high quality design and place shaping for all new development with Policy CP58 further requiring development to protect, conserve and (where possible) enhance the historic environment.

Whilst the building is not listed, nor noted under NDP policy TC5 (Buildings of Local Merit), it has been previously identified under assessment of separate planning applications as an NDHA worthy of retention. The site is also wholly within the Chippenham CA and is within the setting of nearby listed buildings. The application has consequently been submitted with a planning, design and access (D&A) statement which includes a heritage assessment (under section 7).



Figures 4 & 5: undated photos of site (D&A) historic & present



Figure 6: undated photo of site (CA appraisal, 2007)

The Town Council have objected to this application, raising the following summarised points:

- That internal works which have been carried out may *decrease the attractiveness of the ground floor offer for future retailers.*
- That the development will negatively impact an NDHA
- Request for the existing front ground floor windows to be replaced with timber frames surrounding a single glazed piece.
- Request for detailed joinery plans to be submitted
- Supportive of the removal of rear window bars, but request for the frames to be timber
- Concerns around the uncertainty of the proposed development of a 'self-contained unit' to the rear and loss of retail space for the main unit which *could harm its viability and future attractiveness to a retail operator.*
- Request for the vault to remain *either physically linked to the main building, or for doors to be incorporated on either side of any new external courtyard to provide easy access between the spaces.*

Revised plans and an addendum to the D&A were requested to respond to the concerns raised and these were sent and accepted on 13.03.2026. The revisions and additional clarification provided responds

positively to the concerns raised, indicating that the development will support long-term viability of the site, and that operational development will allow for the historic form and evolution of the building to be revealed, appropriately preserving the character of the CA setting. Requests for timber windows and frames as well as detailed joinery drawings have been responded to, and justification on the courtyard separation has been provided which concludes that the operational development will allow for adaptability without resulting in a permanent loss of retail space and represents an appropriate option for improving functionality without unacceptably harming any historic fabric.

The Councils Conservation team have been consulted for their comment but, unfortunately, have been unable to examine the proposal in detail. Officer assessment of harm to the CA setting has, however, been carried out (guided in part by the separate Conservation Team guidance provided under application PL/2026/00068) by Officers and is summarised below.

It is noted that the site is not a building identified as part of recommended enhancement proposal 8 (shop-front improvement scheme) of 'area 14 Market Place' within the CAMP, but instead has its own enhancement proposal (11) which encourages *the HSBC Bank to relocate its cash machine and safe to enable the restoration of the window openings to their original appearance*. It is further noted that the CA statement (2004) and CA appraisal, both at page 163, identifies the site as being a 'building of good townscape merit'. The statement and appraisal both later singles the building out in the following way:

No 2 (HSBC), although a narrow building, has an imposing ionic classical ground floor frontage befitting a bank and is a key positive feature of the space. The upper floors are faced in a different stone and share design details with No. 56/57 and thus it would appear that the bank frontage is a later addition to an earlier building. Despite its positive presence, a number of features detract from this, such as peeling paint on the side elevation, mirror glass in two first floor windows and the applied fascia. At street level the night safe and cash machine are obtrusive features that significantly disrupt the proportion of the frontage. This could be resolved by relocating these facilities to an internal lobby.

The application building is one that is noted within CAMP as requiring minor changes to enhance the façade of the building. The following enhancements to the primary elevation (northeast) are proposed as part of this scheme:

- Removal of the night safe and reinstatement of the removed section of the cill and rail above
- Replacement windows, in materials to match.

These enhancements to the front elevation are in line with CA guidance and will see improvements to the façade without unacceptable demolition to the building fabric.

On page 149 of the CA appraisal, the following statement regarding Materials in area 14 is made:

Traditional town centre materials are predominantly Bath stone or limestone, either sawn or rubble with quoins to principal elevations with the occasional occurrence of warm orange / brown brick in either Flemish, English or common bonds to side and rear elevations. Walls are generally natural stone and often constructed of similar brick and faced in natural stone with plain 'flat tops' using through stones as coping. Particular attention to detail should be given where walls change level. Roofs are historically graded stone or slate and more recently clay Roman or pan tiles. Stone

mullions and window surrounds are common. Windows are generally timber or metal casement or sliding sash. Render is generally roughcast and either bare or limewashed, as is general stonework. Modern concrete blockwork is particularly out of character, as is smooth render.



Figures 7 & 8: Existing and Proposed front (North East) elevation

The Town Councils request for the windows to be a single glazed piece is noted but is taken to be a preferred option rather than one which is backed by CA supporting guidance; on this occasion, the detail shown on the ground floor window plan provided on 13.03.2026 demonstrates appropriate specification and design for the CA setting and no amendments are necessary.

Notwithstanding the above, given that some glazing finishes (such as mirror glass) have been separately singled out (within the CAMP) as undesirable to the front elevation of the building, and given that other further window specification has been provided as part of the application submission, there remains some concerns that specific types of glazing used could be harmful to the CA setting and consequently a condition limiting the glazing type (to be clear, non-reflective) is necessary.

Whilst the full site is within the defined boundary for Character Area 14, the rear aspect is more readily visible from within (and viewed in context with) Area 13 (Gladstone Road, Borough Parade & Wood Lane). Given that the rear (southwest) elevation is not explicitly referred to in association with Area 14 of the CAMP and the rear elevation has a distinctly different character to the front, it is considered that, to appropriately preserve (and where possible enhance) the CA, guidance against both Character Area 13 and 14 should be made. Regarding materials, the CA appraisal for area 13 is not significantly different to area 14 but does note that *modern concrete and blockwork is particularly out of character, as is smooth render and painted facades.*



Figures 9 & 10: existing and proposed rear (southwest) elevation Figure 11 & 12: existing and proposed rear sections

The amendments proposed, which affect and/or would be visible when viewing the rear elevation, include the following:

- The removal of security bars from existing windows
- Replacement of windows
- Demolition of part of the rear single storey flat roofed section of the building to provision a small courtyard between this single storey structure and the 4-storey primary section of the building
 - o Restorative works and operational development to the lowest level of the main building to include the installation of 2no external doors and 2no. sash windows
 - o Operational development to the single storey area to block in the courtyard, and to include the installation of 3no windows.
 - o Replacement of the external staircase, changing from spiral to straight
 - o Making good, and widening of steps to rear car park

Revising the replacement windows to timber is an improvement from the originally proposed UPVC and the removal of the security bars will enhance the character of the setting. Overall, with the inclusion of conditions, the development proposed will preserve the CA character, will not harm the setting of nearby listed buildings, and will appropriately enhance the character of the NDHA.

Design and Neighbouring Amenity

Policy CP57 of the WCS requires high quality design and place shaping for all new development including extensions, alterations and changes of use. Criteria (vii) of CP57 of the WCS includes the requirement to consider the amenity of existing occupants in matters of privacy, overshadowing, vibration and pollution, outlining that schemes should:

- (vii) Have regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the

development itself, including the consideration of privacy, overshadowing, vibration and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter).

Design considerations have been covered in the previous section of this report and given that the scheme proposes operational development which will not much alter the footprint of the building or openings above ground floor, broadly, the amenity that neighbouring occupants will experience post-development will not likely be significantly different to that which would be enjoyed should planning permission not be granted. The development will not result in an unacceptable level of loss of privacy or increase in noise etc.

Biodiversity / Geodiversity

Biodiversity net gain (BNG) is a way of creating and improving natural habitats and ensures that development has a measurably positive impact on biodiversity, compared to what was there before development.

Policy CP50 of the WCS outlines that Wiltshire's natural environment is one of its greatest assets and identifies protection measures necessary for consideration when assessing the impact of development on biodiversity and geodiversity.

Criteria (ii) of Policy CP57 of the WCS encourages development to include:

- (ii) the retention and enhancement of existing important landscaping and natural features (e.g. trees, hedges, banks and watercourses), to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development.

The operational development proposed will not impact more than 25m² of habitat; consequently, the scheme is exempt from BNG.

PLANNING BALANCE AND CONCLUSION

The scheme proposes operational development associated with the permitted commercial and residential use of the site. The site is within the Chippenham CA and is an NDHA of good townscape merit. Chippenham Town Council originally raised objections to the scheme and whilst no revised representation was received during the extended consultation period, the revised plans and further information have been assessed and appropriately respond to the concerns raised to such a degree that, subject to a condition controlling the type of glazing to be installed at the site, the development will preserve the character and appearance of the CA, safeguard the setting of nearby listed buildings, and enhance the significance of the NDHA. Furthermore, the scheme will not give rise to unacceptable impacts on neighbouring amenity and the scale meets an exemption for BNG.

Taking all material considerations into account, including statutory duties under sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1999, the proposal will not harm heritage assets and will secure modest enhancements to the building and its setting through the removal of unsympathetic features. The justification provided for alterations to the rear elevation are accepted and all development proposed will allow for commercial flexibility which would support the long-term commercial viability and will

not result in a permanent loss of retail facilities. Issues raised during the consultation period have been appropriately responded to and planning permission is recommended for approval.

RECOMMENDATION: That planning permission be GRANTED subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Received 22.12.2025:

Proposed Ground Floor Plan; AA/25/23/21

Planning Design and Access Statement

Received 12.01.2026:

Location Plan

Received 13.03.2026

Proposed Elevations Plan; AA.25.23.23 Rev A

Proposed Elevation Sections Plan; AA.25.23.24 Rev A

Proposed Front Window Detail Plan; AA.25.23.25

Addendum to Planning Design and Access Statement

REASON: For the avoidance of doubt and in the interests of proper planning.

3. No glazing on the front (principal) elevation of the building shall be finished in mirrored, reflective, or tinted glass unless otherwise agreed in writing by the Local Planning Authority

REASON: To preserve the character and appearance of the Conservation Area and to ensure that the development preserves the significance of the Non-designated Heritage Asset, in accordance with Core Policies 57 and 58 of the Wiltshire Core Strategy, as well as the aims of relevant policies within the Chippenham Neighbourhood Development Plan and the National Planning Policy Framework.