

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/00313
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	Devizes Castle, Castle Grounds, Devizes, SN10 1HL
DESCRIPTION OF WORKS:	Essential repairs to Moat Bridge
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

Devizes Castle is a Grade I listed building (listing ref: 1249366) and a Scheduled Monument (listing ref: 1021375), located in the town of Devizes in Wiltshire. The site also contains the Grade II listed walls encircling the top of the Castle mound (listing ref. 1263774) and Grade II remains of the original Castle (listing ref. 1249362). The gatehouse of Devizes Castle is also Grade II listed (listing ref. 1249360). The areas under the current Applicant's ownership comprise the majority of northern portion of Devizes Castle, most of the grounds and more recently the Gatehouse. The South Tower and the Coach House are the only areas within the Inner Bailey outside of the Applicant's ownership. The whole lies within the Devizes Conservation Area.

Devizes Castle comprises a 19th-century building, which incorporates an 18th century windmill tower and some very limited fragments of medieval masonry, built atop the surviving earthworks (motte) of the medieval castle. The building was constructed in various phases in the 19th and early 20th centuries and was fundamentally the work of Valentine Leach and his son Robert Leach. On Robert Leach's death, the Castle was bought by Sir Charles Rich, who radically altered and extended the building. The 20th century saw the site fragmented and Castle harmed by successive piecemeal alterations of poor quality and decay through inadequate maintenance which are evident today.

The 19th century moat bridge spans the moat on the south side of the castle and is statutorily listed as a building in the curtilage of the Castle (Grade I) and Castle Walls (Grade II). Whether the moat bridge is listed at Grade I or Grade II has not been determined and this is not a material consideration as the considerations required in either case remain the same. Whilst the bridge lies within the scheduled area, it is specifically excluded from the scheduling, although the ground beneath is included. The moat bridge is a single span masonry arch bridge spanning north to south. It has five chambers in the abutments, one in each corner and two in the north-western corner. Completed in 1843 as a narrow footbridge, the bridge was widened on the eastern side in the late 19th century to allow vehicle access. The construction phases are evident in the external elevations of the bridge which has a tufa-clad southwest elevation and contrasting rough coursed stone blockwork northeast elevation. There are low level parapets on the east and west side and the east side parapet is lower.

Devizes Castle had reached a state of considerable disrepair, with substantial structural damage and unsympathetic repair and refurbishment works evident when a comprehensive repair programme was approved in 2023 for a new owner. The proposals were largely in the nature of

repairs and updating of services with some modest changes to room uses and circulation to suit the particular interests of the new owners.

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

*Devizes Castle including Glass House
and Garden Walls encircling west side of mound*

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The original castle built by Bishop Roger of Salisbury in reign of Henry I has virtually disappeared. It was partly in ruins in the C16, but finally destroyed at the end of the Civil Wars by Order of Parliament. The site is a magnificent one with a great mound and moat. The mound falls steeply on 3 sides towards the undulating ground to the south-west. The rich parklands of the Old Park form with the Castle mound a fine piece of landscape, which should always be preserved. The plan of the town in the form of a fan with the Castle as the centre of the segment, seems to be too formal to be a haphazard growth. It is reasonably certain that the town grew after the building of the Castle, and it would be interesting to know how far the plan was dictated by the Bishopric of Salisbury, so closely connected with the Castle itself, as occurred at a slightly later date in the case of Salisbury city.

The existing structure was begun in 1842 by Goodridge of Bath. Highly asymmetrical. The ashlar faced keep and turret to the south are Goodridge with paired lights divided by colonettes in narrow openings. The rest to the north is a massive rock faced enlargement of 1860's, 70's and 80's. Crenellated parapet, buttresses, superimposed bays, oriel windows and large mullioned and transomed windows. The north tower however, is partly of C17 brick and was originally a windmill. It's rubble base may be part of the original castle. Around the north tower's base, facing west, is a bowed fernery with stone tiled roof, round interlaced arches forming pointed lights with Norman style shafts dividing. Adjoining the fernery to the north is a fine glass house with octagonal base and a stepped domical roof with crowning finial. The entrances are to the east and west: wooden gables with ornamented bargeboards supported by flanking paired colonettes with foliate capitals, on high pedestals.

A terrace surrounds the castle with a battlemented parapet. On the west side towards the centre are 2 short sections of arcaded wall, one incorporating in arch some original Norman stone work of zig zag pattern. The interior of the castle is designed in a mixture of neo-Norman, Gothic and C16 styles. The drawing room and bedroom in the northern section facing west have the partly original frames of C16 or early C17 ceilings inserted with carved and gilded bosses, small brackets and ribs, the whole completed in plaster.

PROPOSAL

The works comprise repairs to the Moat Bridge, which lies to the south of the castle across the dry moat. The bridge was constructed as a passenger bridge and then extended to the west to take vehicular traffic.

The works include a series of structural and general repairs. Structural works include the following:

- A grid in Cintec anchors on the west face to tie back the outer walls and facings to the arches and bridge internal structure.
- Removal of debris and vegetation for gaps in structures, with subsequent grouting in conjunction with the Cintec anchors.
- Replacement of missing/collapsed areas of brickwork and stonework to ensure structural integrity of structure.
- Rebuilding of individual merlons and cappings where in poor condition or where displaced due to impact damage.
- Removal of modern block and steel beam structure from below main arch following Cintec Anchor repairs.
- Rebuilding of internal windows where fractured and collapsed – or consider propping via infilling with masonry ‘plug’.

General repairs include the following:

- Remove debris and stored items in chambers below bridge.
- Removal of hard cementitious pointing from stone facings where prejudicial to stonework.
- Resetting of dislodged, loose or missing stones/bricks.
- Repointing of areas of missing or eroded mortar pointing to adequate depth to support masonry.
- Replacement of missing and/or concrete substitute end blocks to merlons.
- Repointing and resetting stones to merlon cappings.
- Repair or replacement of existing timber gate/grilles and frames to Chambers 3 + 4.

RELEVANT PLANNING HISTORY

Proposal / Summary
PL/2022/07526 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 11/11/2022 – Investigative and opening-up works to the historic building fabric of Devizes Castle and other associated works
ENQ/2023/00507 - Pre-Application enquiry Decision - Pre-App Response Date: 1/6/2023 – Sympathetic conservation repairs and partial restorations
PL/2023/07677 - Full planning permission Decision - Approve with Conditions Date: 15/12/2023 – External conservation repair and restoration works to the external fabric of Devizes Castle and other external alterations at roof level alongside other associated works.
PL/2023/07957 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 15/12/2023 – Internal alterations, reconfigurations, conservation repairs, restorations, refurbishment and redecoration works throughout the interior of Devizes Castle and other associated works.
PL/2024/01845 - Full planning permission Decision - Approve with Conditions Date: 7/5/2024 – Temporary dismantling of a section of the curtain wall and reinstatement on a like-for-like basis and other associated works
PL/2024/02249 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: – Temporary dismantling of a section of the curtain wall and reinstatement on a like-for-like basis and other associated works

PL/2025/01210 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 9/4/2025 – A series of conservation-led repairs and alterations to the interiors of Devizes Castle and associated works.
PL/2025/05956 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 9/9/2025 – Underpinning of the Fernery Arcade at Devizes Castle, and associated works.
PL/2026/00431 - Listed building consent (Alt/Ext) – Proposed works to renew the below-ground drainage systems
PL/2026/00313 - Listed building consent (Alt/Ext) – Essential repairs to Moat Bridge

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

Historic England – (summary – full response available on the public website)

13-02-26 Historic England has concerns regarding the application on heritage grounds. These concerns relate to the impact of the proposed Cintec anchors, the fact that the proposals do not address all issues raised in the Structural Report and the provision of insufficient information, including a structural specification, to justify the impact of the proposals.

If no structural specification or input has been sought beyond the initial structural report a CARE accredited engineer or an engineer experienced in conservation should be appointed to work up the design to construction level information. A Cintec design should not be used directly without the input of a structural engineer.

30-04-26 We consider that the additional information provided has addressed the queries and concerns raised in our letter of 12th February 2026 and we do not wish to offer any further comments.

Ecology Team – (summary – full response available on the public website) note the presence of bats as set out within the submitted protected species survey. Requests 2 conditions to secure compliance with recommendations within the report and controls over lighting and an informative to highlight protected species legislation and the need for a European Licence.

Devizes Town Council – no objection

REPRESENTATIONS

In accordance with the requirements of Section 5(1) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) the application for listed building consent was publicised by way of:

- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and to allow a statutory consultation period of **21 days** for representations to be submitted.

Below is a summary of the representations received during the consultation period. In accordance with the provisions of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, only

matters relevant to the consideration of the building's special architectural or historic interest have been taken into account in the assessment of this Listed Building Consent application.

Trust for Devizes - support

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.

The application is supported by a Heritage Impact assessment which follows on and builds on the assessment provided by the comprehensive Heritage Statement submitted in support of the original applications. In addition, a Design and Access Statement and Structural Report describe the condition of the structure and works required.

In combination the submitted reports provide sufficient information to understand the impact of the proposals and are proportionate to their scope. The requirements of the NPPF are therefore met in this respect.

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 bridge is of historic and architectural significance as a deliberately designed ancillary structure which is one of a number of picturesque landscape embellishments in the

Castle grounds. It is a historic, first pedestrian then vehicular, access point to Devizes Castle that has group value with the Castle's other ancillary structures.

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 proposed works are repairs, required in order to place the structure back in a good state of repair and to address structural issues which are beginning to compromise the structural integrity of the structure.

The proposals have been assessed by Historic England's special engineers and they are in agreement, following the submission of additional information, that the works are required and are appropriately specified to achieve the structural and repair aims whilst having the limited impact on the special interest of the building.

Impact on Ecology

While Sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 do not explicitly reference protected species, Local Planning Authorities have a statutory duty to consider potential impacts on protected species when determining applications. This responsibility arises from broader environmental legislation and national planning policy, and must be taken into account where relevant.

		Y / N / NA
(a)	Does the site or proposed development possess/impact on any of the features where protected species are likely to be present (assessed against Natural England's standing advice) and where species are likely to be found?	Y
(b)	If yes, has a protected species survey been submitted?	
(c)	If yes, does the survey show a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity in accordance with the standing advice?	

Comments (if any): an ecology report has been submitted which confirms the presence of bats. The report makes various recommendations and a condition will be added to secure compliance with these recommendations as per the Ecology Team comment.

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.

In this case, the impact of the proposals on heritage assets will be largely positive and will 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 structure.

The requirements of current conservation legislation, policy or guidance are considered to be met and the application is recommended for approval.

RECOMMENDATION:

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

Timescale

Plans list

LP Planning
Covering Letter 16 January 2026

Scott & Twine
Design and Access Statement: Moat Bridge Issue 4 16 January 2026
Moat Bridge – Road Level Plan as Existing ref. 2256-02-007
Moat Bridge – East and West Elevations as Existing ref. 2256-02-015
Moat Bridge – Sections A-A and B-B as Existing 2256-02-021
Moat Bridge – Sections C-C and D-D as Existing 2256-02-022

Moat Bridge – Low Level Plan as Proposed ref. 2256-02-106 Rev B
Moat Bridge – Road Level Plan as Proposed ref. 2256-02-107 Rev D
Moat Bridge – East and West Elevations as Proposed ref. 2256-02-215 Rev B
Moat Bridge – Sections A-A and B-B as Proposed ref. 2256-02-321 Rev C
Moat Bridge – Sections C-C and D-D as Proposed 2256-02-322 Rev C

HPA
Heritage Impact Assessment 13 January 2026

Frank W Haywood and Associates
Structural Report - 12444 February 2026

Ecology - compliance with submitted documents

The development will be carried out in strict accordance with the following document:

- Sections 7.1-7.15 (mitigation and enhancements) of the 'Ecological Impact Assessment, LC Ecological Services, February 2025'

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

Ecology - lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats and other wildlife.

INFORMATIVE – bats

The moat bridge at Devizes Castle is used as a bat roost and swarming site for multiple species. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future works to the bridge could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.