

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/02511 & PL/2026/02742
Reinstatement works following fire and subsequent water damage. The works include replacement of fire-damaged elements and repair or replacement of fabric affected by water ingress. The application also includes the construction of a workshop within the garden of No. 3 to facilitate plaster repairs, including mouldings and decorative work, to be carried out on site.
3 Northgate Street, Devizes, SN10 1JL

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

Recommendations:

☐	No comment
☐	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

Scope of comments: the following comments relate to the built historic environment.

National Policy and guidance: 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 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 214-16 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.

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.

Historic England’s “Conservation Principles” provides policy and guidance for the “sustainable management of the historic environment”. Additional guidance is also contained within their publications:

- **Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)**
- **Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets (2nd edition)**

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:

Local Policy: 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.” 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.

The Council’s Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to “demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) “enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development” and “responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting.”

Proposal: Reinstatement works following fire and subsequent water damage. The works include replacement of fire-damaged elements and repair or replacement of fabric affected by water ingress. The application also includes the construction of a workshop within the garden of No. 3 to facilitate plaster repairs, including mouldings and decorative work, to be carried out on site.

Relevant planning history: N/A

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 “Historic Buildings Statement” which provides good information to understand the building, its setting, the impact of the proposals and is proportionate to their scope. The requirements of the NPPF are therefore met in this respect. Following the site visit, it was clear that some information on the building is unknown because of it being covered by modern fibre board/ timber or the space not safely accessible due to the fire damage.

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.

The interest may be architectural, or historic as set out in the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 S 1.

The building is recognised as Grade II* listed as much of the interiors retain the historic decorative plaster work and joinery details, including doors. Whilst the building has been sub-divided into three self-contained units, this has had limited impact on the building, and the historic floor plan is still legible.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest, and which contribute to the character of the conservation area.

The rear of the building has been subject to numerous alterations and additions, with the historic structure covered in a cement-based render. The rear has been subject to illegal installation of UPVC double glazed windows.

Assessment: The current owner has recently bought the building following the fire. At the site visit it was noted that several unauthorised works have historically been undertaken, including the installation of UPVC windows to the rear, and ad-hoc minor works internally. Any liability is with the current owner, but we would not be looking to enforce in this situation as the new owner is looking to under works to rectify the unconsented works in future phases following this initial application to make the building structurally sound and watertight. The unconsented internal works are generally over-boarding historic fabric with fibre board or timber fillets and whilst considered to cause harm, they are easily removed with only minor/ minimal impact on the historic fabric behind.

External Works – Front (NE) Elevation

The front elevation has a modern plastic paint and is starting to fail in places. The use of this type of paint is not encouraged for listed buildings as it prevents breathability (vapour permeability) of the historic fabric which can lead to further defects and loss of fabric. The proposed paint removal is to be undertaken with a poultice method which is a careful and gentle method that protects the historic fabric. Following the removal of the modern paint, it is proposed to apply a lime shelter coat. The removal of the modern paint system and the application of a shelter coat is supported. A brief method statement should be supplied to ensure that best practice is undertaken.

Following the removal of the paint, mortar repairs are to be undertaken using lime mortar to match the historic fabric (lime mortar). The extent of the repairs and repointing will not be fully understood until the removal of the paint has been undertaken, and an inspection of the substrate has been undertaken. The principle is acceptable.

The front elevation windows and doors are proposed to be overhauled and redecorated. The ground floor single glazed sash windows have been subject to being fully stripped previously and have had some scarf repairs previously undertaken. The upper floors appear to have less historic intervention. The proposed works will allow for the long-term protection of the historic fabric and is supported.

The existing roof structure has been partially damaged by the fire, and the proposed scheme looks to undertake the required roof repairs, including replacement stone tiles to the front elevation pitch to provide a united appearance, with the salvaged stone tiles being used on the rear elevation. The proposed works look to replace the lost and heavily fire damaged timbers, whilst retaining the main timber structure. Due to the nature of the proposed works, there may be some minor alterations to the scheme when the works commence, and areas are exposed and fully assessed in a safe working environment. Details of the ethos and approach undertaken within the applications is to preserve and protect as much historic fabric as possible, by retaining some damaged timber to allow for a visual understanding of the history of the building

but ensuring that the building is structurally sound for the long-term future of the building. The proposed works are considered to be a practical and balanced approach.

External Works – Rear (SE) Elevation

The proposed works are for removal of the cement render, inspect the structure for any repairs, which may include timber frame repairs and then apply a new lime render. This will allow the building to move, flex and breathe to support the historic fabric and structure. The proposed removal of the cement render which has failed and has severe cracking is supported. Any repairs to the structure may require further consent or discussion, but at present it is not possible to fully ascertain the structure whilst there is cement render on the structure.

The existing roof structure has been partially damaged by the fire, and the proposed scheme looks to undertake the required roof repairs and reuse the stone tiles / pantiles to the rear elevation pitch to provide a united appearance. This is supported.

Internal Works

The water from putting out the fire and the exposed roof structure (for over a year) has resulted in water ingress to the left side of the building. The proposed internal works look to start the process to make good the areas of damaged decorative plasterwork, walls/ ceilings and floorboards to the left-hand side of the building. Many of these features are original, and of high quality, even if difficult to assess with the layers of paint, and they respond to the high GII* listing of the building. However, due to the long-term exposure to the elements, they have failed in localised areas, and therefore careful restoration and replacement using traditional materials and techniques is required. The proposed approach is to maintain as much original and significant fabric as possible, but where it has failed to replace with traditional materials and techniques, using the existing as a template for the areas that require replacement.

Additional Information

As part of the longer-term plan to restore the building, the owner is looking to provide training and public opportunities to the site to understand the building and traditional construction techniques and repairs. This is considered to be of public and heritage benefits.

The building has suffered from longer term neglect and poor maintenance, which has had some benefit that much of the historic fabric remains and has not been replaced to modernise or to support the sub-division of the building. It is acknowledged that some further works, such as fire separation, are required, especially to maintain the building as 3 self-contained units. This will need careful consideration and detailing to protect the significance of the building. This will be subject to further applications and does not form part of this application.

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 building has been subject to long term poor maintenance and then has suffered from water ingress as a result of the fire to the adjoining property. This is the first in a series of applications to bring the building back to life under the care of the new owner. Some consideration of the unknown extent of the initial repairs has been provided as it is not possible to fully assess/ access the building. A practical and staged approach has been applied.

The impact of the proposals on heritage assets will be largely positive, the heritage assets will be enhanced, 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 applications.

Proposed Conditions

Method Statement

No works hereby approved shall take place until a method statement for non-abrasive cleaning of stone or brick has been submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Test Patch

Following written approval from the Local Planning Authority for the stone/brick cleaning method statement, a sample/ test patched in an agreed location should be undertaken, and the Local Planning Authority Conservation Officer invited to inspect the sample/ test patch. No further works should be undertaken until the sample/test has been approved by the Local Planning Authority.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

External Materials

The external finishes of the works hereby consented shall match in material, colour, style, bonding, and texture those of the existing building.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Written details & samples of materials

No works shall take place until written details and samples of the materials (either product details or examples on site) to be used in the works of the external surfaces of the works hereby consented have been submitted to and approved in writing by the Local Planning Authority. The works shall be completed using the approved materials.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

No works to timber frame

No part of the existing timber frame shall be removed or cut unless details have been submitted to and approved in writing by the Local Planning Authority.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Roof Repairs

Following the careful inspection of the existing roof structure, and prior to any repair works being undertaken, a confirmation of the extent of the roof repair works to be undertaken should be provided and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the

approved details. Should further repairs be discovered on undertaking these works, works should stop and contact should be made to the Conservation Officer.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Details of render mix

No works hereby approved following the cleaning and removal of the paint to the front and rear elevation shall take place until details confirming render mix, method of application and proposed finished colour have been submitted to and approved by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: In the interests of visual amenity, and to ensure that special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Lime mortar – to be specified

No works hereby approved shall take place until a specification of the lime mortar(s) has been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Preparation for repointing

All raking out of mortar is to be carried out with hand tools and not with mechanical or power-driven devices.

Reason: To ensure no damage occurs to the historic brickwork of the Listed structure under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Mortar specification for repointing

No works hereby consented shall take place until a specification for the lime-based mortar to be used for repointing has been submitted to and approved in writing by the Local Planning Authority and the works carried out in accordance. The works shall be carried out in accordance with the approved details.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

Areas for repointing

No works hereby consented shall take place until a drawing to show the areas to be repointed, a methodology for removing the existing pointing and a specification for a lime-based mortar to be used for repointing, have been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.

New tiles

No works hereby approved shall take place until samples (details of manufacture and tile) have been submitted and approved in writing by the Local Planning Authority. The proposed new roof covering shall be new handmade, to match the existing roof tiles.

Reason: To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.