

APPLICATION FOR LISTED BUILDING CONSENT

OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/01812
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	Conservative Club, 30 Long Street, Devizes, SN10 1NW
DESCRIPTION OF WORKS:	Remove existing stone tiles (approx 30m ²) and replace with natural slates
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The application site comprises a two-storey red brick house, with stone quoins and a central, split pediment to the front entrance door known as the Conservation Club, which is a *Grade II* listed building*, located within the settlement of Devizes. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The site lies within Devizes Conservation Area and provides a positive contribution to the character of Long Street with its polite architecture formed of five bays, plus an additional bay with a coach opening. The roof is formed of a mansard design, covered in the public elevations with plain red tiles with ridge detail. The front of the roof is partially screened by a small parapet.

The building exhibits an early example of Polite architecture, constructed of red brick, with stone quoins, window surrounds, split pedimented central entrance door and the overhanging eaves dentil detail sits below the parapet. The building retains features of special interest that contribute to its heritage significance.

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

2. Mid C18. 2 storeys, attic and cellars. Brick on projecting plinth with stone capping. Splayed projecting stone quoins. Moulded and modillion cornice. Brick parapet with moulded stone coping. Hipped mansard old tile roof. 2 dormer windows, glazing altered, with architrave surrounds and small cornices. 5 windows on 1st floor with moulded stone cills and projecting surrounds. 4 windows on ground floor with projecting surrounds and small cornices, no glazing bars. 4 cellar grilles. Tall central door of 6 fielded panels in stone surround with small carved stone brackets supporting stone cornice and opposing curved scroll pediment with rosette ornament to scroll ends. Door approached by 3 moulded stone steps. Extension right hand same design. One window with keystone and stone cill to upper floors and 3-centred arch (blocked) on ground floor with wide stone surround, projecting plinth, springers and keystone. Large garden with fine trees. Wing at back has stone tile roof. Interior panelling, plasterwork and staircase.

PROPOSAL

The proposed works are to remove existing stone tiles (approx 30m²) and replace with natural slates to an internal roof slope to the north and east elevations. The existing north elevation is covered with natural stone, and it is proposed to replace with natural stone. The existing east

elevation is a mix of clay tiles to one side, with slate and stone tiles to the other. It is proposed to replace the failed stone tiles with slates.

The submitted application has provided photographs showing the condition of the existing stone tiles to the concealed elevation which have come to the end of their natural life through delamination and spoiling.

No information has been provided on any proposed membrane or up grade to insulation.

RELEVANT PLANNING HISTORY

Proposal / Summary
K/77/0164 - Full planning permission Decision - Approve with Conditions Date: 16/11/1977 – Extension to club premises to provide skittle ally and ballroom
K/17873 - Full planning permission Decision - Approve with Conditions Date: 12/9/1991 – ALTERATIONS AND EXTENSIONS
K/17322/L - Listed building consent Decision - Approve with Conditions Date: 6/6/1991 – ALTERATIONS AND EXTENSIONS
E/10/1695/FUL - Full planning permission Decision - Approve with Conditions Date: 11/2/2011 – Refurbish the single storey pitched roof rear annex to a two bedroom self contained property.
E/10/1696/LBC - Listed building consent Decision - Approve with Conditions Date: 11/2/2011 – Refurbish the single storey pitched roof rear annex to a two bedroom self contained property.
K/42728/L - Listed building consent Decision - Approve with Conditions Date: 6/6/2002 – Repairs, renovation and alterations
K/82/0237/LB - Listed building consent Decision - Approve with Conditions Date: 27/4/1982 – Extension to first floor to form kitchen
K/82/0238/LB - Full planning permission Decision - Approve with Conditions Date: 27/4/1982 – Extension to first floor to form kitchen

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.

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 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

Devizes Town Council and Trust for Devizes raised no objections to the works, but there was a request for the recording of the roof structure once exposed.

Historic England provided no comment.

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.

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 submitted application included a Heritage Statement that identified the building as Grade II listed, rather than Grade II*, but provided sufficient justification to support the required roof works due to the water ingress into the building. Water within historic fabric has the potential to cause long term defects if not resolved. The Heritage Statement advised that there was no understanding why the roof had various roof covering (plain tile, slate and stone tiles). The submitted information is considered to be sufficient to support the application.

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 the architectural design and plan of the building, as it responds to the changes in architectural designs from vernacular to Polite architecture during the late C17 and C18. The front elevation retains architectural ideas found in late C17, such as the dentil detail, quoins and the split pediment, and the more precise, theory driven designs associated with the Georgian period.

The design of the roof (mansard) was introduced in France in the C16 but named after the C17 French architect Francois Mansart (1598 - 1666), with the idea moving to England and becoming fashionable in England in the C19. This makes the roof structure of some importance to the significance of the building. It is unclear why there is a variety of roof coverings, but it is likely to be the result of piecemeal repairs, using a material that was available at the time. It is not uncommon for alternative materials to be used between the main elevations and hidden roof structures, or for a combination of slate and stone tiles within the area.

The building contributes to the character of the conservation area, with Long Street characterised with several high quality, large dwellings of status. The development on this street shows the wealth and importance of Devizes in the C17 & C18 due to trade.

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 historic roof structure is an important part of the significance of the Grade II* listed building. Roof coverings do have a life expectancy due to the exposure to weather and the material they are formed with. The life expectancy of a roof covering will vary with its position, as well as the material itself. A protected stone slate could last up to 200 years, whereas natural slate will typically last between 75-150+ years, and plain clay tile between 60-100 years. They are by their nature expected to be replaced to ensure that they continue their role to provide weather protection to the roof structure and the building.

The proposed roof slopes are screened from public view and offer a mix of roof coverings. The proposed works to the north elevation are a 'like for like', using the same materials and this is considered to cause no harm to the significance of the listed building.

The east elevation has clay tiles to the elevation which can be seen in the public realm and a mix of slates and stone tiles to the inner face of the mansard roof. Stone slates are significantly heavier than the other roof coverings, and this may be the reason why there were placed on the lower section, allowing the upper section of the Mansard to have a lighter roof covering of slate. The proposed replacement with a natural slate in this section is considered to be acceptable as it is screened from public view and will protect the roof structure from an unbalance loading. The proposed replacement of the roof covering is considered to ensure the long-term protection of the historic fabric by ensuring the building is water and weathertight.

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 proposals will also result in heritage benefits by virtue of the proposed investment in repair will help to secure the future 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?	N
(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: It is advised that a Bat Survey is undertaken prior to the works to ensure that there are no bats within the area.

CONCLUSION

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the Local Planning Authority carefully considers any proposed works preserve the listed building, its setting, and any features of special architectural or historic interest.

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 the requirements of current conservation legislation, policy or guidance are considered to be met.

RECOMMENDATION:

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

WA1 FULL PLANNING PERMISSION -COMMENCEMENT 3 YEARS

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.

WL1 FURTHER DETAILS REQUIRED

Notwithstanding the approved drawings, no works shall commence until details of the following matters have been submitted to and approved in writing by the Local Planning Authority:

- i) Details of proposed natural slates
- ii) Details of any membrane or insulation to be installed

WL12 NATURAL STONE ROOF TILING

The natural stone roof tiles shall be laid to regularly diminishing courses from eaves to ridge to present unbroken coursing in the traditional manner.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

POLICY-[number & purpose]

WL15 RETAIN ROOF TIMBERS

The existing roof timbers shall be retained, uncut and unaltered in situ as part of the approved scheme.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

POLICY-[number & purpose]

WL17 SURVEY / PHOTOGRAPHIC RECORD

No works shall commence on site until a full survey, including analysis, and photographic record of the listed building(s) has been submitted to and approved in writing by the Local Planning Authority.

REASON: To secure the proper recording of the listed building.

POLICY-[number & purpose]