

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/02651 & PL/2026/03263
Like for like replacement of the existing Georgian front door, with no changes to the existing openings. This will return the front façade to its original state, in keeping with the listed building and historic street scene.
2 Hare And Hounds Street, Devizes, SN10 1LZ

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:

HE GPA3 Part 1:

"The NPPF makes it clear that the setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset."

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

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

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

Other HE publications

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

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

Historic England Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency provides specific advice relevant to development of this nature.

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."

Proposal: Like for like replacement of the existing Georgian front door, with no changes to the existing openings. This will return the front façade to its original state, in keeping with the listed building and historic street scene.

Relevant planning history: NA

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, whilst the applications are accompanied by a “Design & Access and Heritage Statement” the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

However, 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.

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 property is a Grade II Listed, semi-detached building, located in the Devizes Conservation Area. The listing description provides the following summary:

2. C18. 2 storeys attic and cellars. Brick on projecting plinth with splayed stone capping. Stone quoins. Splayed string over ground floor windows. Moulded stone eaves cornice. Gable end modern pantile roof. 2 rebuilt sash dormers. 4 windows on 1st floor: alternating paired and single sashes, slightly recessed, glazing bars intact, moulded frames, set in painted stone surrounds. Ground floor: 2 tripartite sash windows in moulded frames, glazing bars intact, block sills. 2 doors, that of No 2 slightly narrower, 5 panels, 3 glazed, the top one with interlaced curved pattern, in plain stone surrounds under flat hoods on cut brackets. Cellar gratings.

Nos 2 to 26 (even) form a group.

The Conservation Area Appraisal forms a character group of Bridewell Street, Sheep Street and Hare & Hounds Street, which are predominantly 18th and 19th century, two-storey brick houses. Sheep Street and Hare & Hounds Street saw change in the 1960s-70s which respond to the changes of town planning during this period. As noted within the listing description, Nos 2-26 (even) form a group of C18, two-storey buildings that would have been a common sight within the working areas of the town centre.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing which have significant aesthetic and architectural interest. The group setting and the relationship with the Hare & Hounds Public House in the form of the terrace which curves around the corner contribute to the character of the conservation area.

Assessment: The existing door is a five-panel door, with the top panel being a glazed unit with a distinctive over-door light of two crossing arcs. The submitted information provides no guidance on the age or construction of the door or its relationship with the adjoining property which has the same entrance door. A drawing showing the existing section of the door, glazing bar details and frame would help provide some understanding of the door and its significance.

The existing door details can then be used to assess if the replacement door would replicate the details of the existing. Without this information it is difficult to assess whether the proposed door is considered a ‘like for like’ replacement. This is particularly important in this location as there is an identical door to the adjoining property and the pair form a positive contribution to the street scene and the character of the conservation area. The proposed door section indicates that this will be a solid timber door and not formed of panels as the existing door is, which would not be acceptable as this alters the construction method of the door and changes the direction of the wood grains, which when painted would be noticeable. The proposed drip detail appears to be different from the existing door.

The existing door is single glazed, but it is unclear if this is historic glass with its imperfections such as ripples, sometimes a slightly different colour (often with a green tinge) and possible bubbles. If it is historic glass, this adds to the significance and appearance. The proposed door offers single glazing, but there is no indication if the glazing bars are applied or integrity. The ironmongery can also form part of the significance of the door and frame, and this should be considered either for re-use or confirming that it has been replaced over the life of the door.

The submitted scheme appears to replace the door and frame, but there is no discussion on the consideration to replace the existing door only (retaining the frame), or why the existing door cannot be repaired. The submitted information notes that the existing door has come to the end of its natural life and requires replacement as the existing door has 'poor airtightness and thermal performance' which has resulted in the door having 'a direct impact on the internal environment' but provides no further evidence, such as photographs or a report, to support this. Under the NPPF, where there is any harm to the significance of a designated heritage asset there is a requirement to provide clear and convincing justification (para.213). The loss of historic fabric (door and frame) is considered to cause harm to the significance of the designated heritage asset, and no clear and convincing justification has been provided.

When considering improving the thermal efficiency of an older building, a holistic approach should be undertaken as replacing the door is likely to have a limited impact. In an appeal for a replacement front door and side window, (APP/M2270/D/22/3290916 11 April 2023) it was considered that improvement in energy efficiency of the house was a 'private rather than public benefit' and highlighted that this was not the only method to improve energy efficiency to the building (para. 12). Therefore, a similar approach is considered here.

There are many factors that can impact the internal environment of an older building, including the use of inappropriate materials (such as modern gypsum plaster, removing sources of natural ventilation, etc) and a holistic approach should be undertaken to improve the internal environment. Details can be found within the HE guidance [Adapting Historic Buildings for Energy and Carbon Efficiency - Historic England Advice Note 18 | Historic England](#) or [Caring for your home](#)

The submitted photographs show damp staining above the door, and it is possible that the water is dripping onto the flat roof of the canopy and penetrating the fabric, contributing to the possible dampness internally.

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 proposals will result in harm to the building via the loss of historic fabric and character. The proposals involve only part of the building and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of door and frame, and terminology should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 and 66 of the Act requires that any level harm caused should be taken seriously.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and it has not been demonstrated that the works will result in any public benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.