

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/01918
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	11 Church Street, Bradford on Avon, BA15 1LW
DESCRIPTION OF WORKS:	Replacement of existing front door with a new door matched to the existing. Installation of an iron/zinc scoop canopy over the door.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

No.11 Church Street is a grade II listed building dating from the late 17th century. Built of squared rubble limestone with Ashlar dressings under a stone tiled roof, the building is part of a row of similarly styled and scaled traditional cottages lining this part of the conservation area, opposite the grade I Holy Trinity Church. Set back from the road with a boundary wall and frontage garden.

The site lies within the Bradford on Avon Conservation Area.

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

A small group, forming the east end of row of cottages. Late C17. 2 storeys. Rubble with ashlar dressings, and stone-tile roofs. 3 windows and 2 dormers to each property. Dormers have 2-light leaded casements, hipped stone tiled roofs and tile hung sides. Other windows are 2-light leaded casements, with stone mullions to No 11. 2 square-headed plain doorways, one to left, and one to right of frontage with wood lattice porch. No 14 is a similar building to rear of No 12. Stone outbuildings in low range to right-hand side, in front of No 14. Single storey with coped end-gable and carriage arch.

All the listed buildings in Church Street the Chantry Little Chantry, Barton Orchard and the Catholic Church of St Thomas More, Market Street form a group with Nos 7 and 9 to 19 Barton Orchard, Nos 5 and 6 and 27 to 31 (consec) and wall Newtown.

PROPOSAL

Replacement of existing front door with a new door matched to the existing. Installation of an iron/zinc scoop canopy over the door.

RELEVANT PLANNING HISTORY

Proposal / Summary
W/05/00871/FUL - Full planning permission Decision - Approved Date: 4/7/2005 – Sub-division of single dwelling to form two separate dwellings
W/05/00872/LBC - Listed building consent Decision - Approve with Conditions Date: 27/9/2005 – Alterations to interior, installation of heating system and damp proofing

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

Bradford-on-Avon Town Council – no objection.

Bradford-on-Avon Preservation Trust – Object – *“We question the use of a “Regency style” canopy over the door of a far older listed building within the conservation area. This is a highly sensitive area of the town surrounded by historic buildings including Holy Trinity Church. A simple flat stone canopy would be more typical for the age of the property. Turning now to the door, we would expect repair rather than replacement.”*

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.

- Heritage, Design and Access Statement
- Supporting information document

The information listed above is a good statement on the current condition of the door and frame. Also presented is some research into the history of the building, including some ‘stills’ from a film that have the building in the background, to confirm the presence of a porch in the mid-to-late 20th century. This is considered adequate and proportionate for the works proposed, and therefore considered to be sufficient information 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 its architectural quality as a stone-built house, part of a row of similarly sized and detailed vernacular cottages, its fabric and detailing combining to give strong aesthetic qualities and contributing to the architectural hierarchy of dwellings in the conservation area.

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 application is for two separate elements, one being a replacement front door, the second to fit a canopy over, to be commented on in turn:

Front door – the existing door is an historic door, a traditional four panel door, typical of the 19th century period, although not original, is a sympathetic style that reflects the subtle evolution of the building. The door has been exposed to the elements for several decades, and without a

raised threshold or canopy or roof guttering that might otherwise protect the front door from the worst of the elements, the frame and lower section of the door have signs of rot.

The BoAPT has requested that the door be repaired as opposed to replaced, however in this instance, the repair to such a feature would mean that its integrity is weakened, as replaced or spliced components (such as rails and stiles) are compromised. The repaired sections may also be more susceptible to movement, thereby weakening the structure as movement exacerbates wear on the joints: this in turn can compromise the security of the building.

Due to the affected area being approximately a third of the lower part of the door, to request repair in this instance is considered unreasonable due to the points raised above. As the door is proposed is an exact copy of the existing door (as confirmed by the submitted joinery details), replacing the door due to its current condition is not considered to cause harm to the significance of the designated heritage asset. There will be some harm from the loss of the historic joinery, however the overriding concern is to provide a sound and secure front door to the listed building, which will maintain its viability.

Door canopy – the cottage does not have any form of canopy or porch over the door, and the stone slate roof does not have guttering, which is quite traditional for such a roof. The neighbouring listed building, No.10, has a stone canopy, and No.12 did have a lattice timber porch, although this no longer survives. The proposal is to fit a galvanised metal canopy, which is concave, or a ‘scoop’ (as referred to in the product brochure), and will require minimal surface fixings into the stone.

The BoAPT have objected to the style of canopy (as it is ‘Regency’ in style), and suggest a stone canopy (as per No.10), however there is no physical evidence that a stone canopy once existed here, and therefore to insert such a feature would require more intrusion into historic fabric. Also, the cottage is not defined by a particular architectural period, nor is there an architectural style over the whole row of cottages that form this important grouping. It is not Classical/Georgian/Regency in style despite it dating from the late 17th century, and has a much simpler ‘cottage’ character, with some detailing that perhaps elevates its status, such as the stone quoins and mullions, but only very slightly. The cottages have some signs of alteration as they have evolved, yet retain a vernacular character of no particular style or period, simply their construction materials and form being key characteristics contributing to their overall significance.

The addition of the canopy proposed is a fairly simple, neat solution to provide some protection from the elements whilst entering/exiting the building, and in theory could easily be reversed in the future. The addition of this particular canopy, therefore, is not considered to cause harm to the overall character of the cottage or the row as a whole, and is an unobtrusive addition to its frontage, aided by the material and finish of the canopy.

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?	N/A
(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):

N/A

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 overall impact of the proposals on the designated heritage assets will be fairly neutral, whilst providing a sound and secure front door and a door canopy that does not compromise the character of the front elevation. The works are not considered to cause any harm to the building's significance, and its special interest will be preserved, as will the character and appearance of the conservation area. On that basis, 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:

- Standard time limit
- Plan refs
- Door to have painted finish