

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/02904
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	7 Elm Court, Byron Road, Devizes, SN10 5FB
DESCRIPTION OF WORKS:	Like for like replacement of the existing External door with fanlight, with no changes to the existing openings. This will return the elevation back to its original state.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The application site comprises a mid-terrace two-storey masonry-built dwelling, known as 7 Elm Court, 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 the former Roundway Hospital complex to the south of the historic town of Devizes. Elm Court forms one of the wings of the original hospital and has been subject to sensitive alterations to create a terrace of houses, set around a parking area. It appears that much of the original fabric remains to the elevations, though No.7 has had a render applied to the stone finish. The building has since been converted into self-contained dwellings, and some changes have occurred to allow the conversion.

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

Former Wiltshire County Asylum, 1849-51 by T H Wyatt. Extended 1858, 1863, 1867 and 1877 to accomodate more patients. A recreation hall was added 1897-8. Bath stone ashlar with slate roofs having overhanging bracketed eaves and ashlar stacks. Campanile type towers have pyramid roofs and ventilation cowls designed as octagonal tempietti with ogee roofs. Italianate style. Long symmetrical front range of 2 and 3 stories: 5 rear cross-wings forming courtyards originally used for the kitchen and exercise. Central administrative block of 3 stories and basement, the end and central bays slightly projecting. The end bays have canted angles; the central bay is pedimented. Window range 1-3-3-3-1 sashes; 1st floor round-arched, those in central bay arcaded corresponding to the 3 void arcaded main entrance porch below, end bays being of Venetian type. Ground floor windows with keystones. Arch-headed doorways in re-entrant angles of outer bays. Attached to this front a good cast-iron area balustrade. Flanking this block, long 2-storey ranges, with short canted-angle cross wings, all in similar style but the glazing bar sashes generally replaced with plate glass. Rear elevations in similar style with some C19 metal-framed glazing. To the SW of the kitchen, a 2-storey block with loading door and crane. Central rear courtyard block with barrel-vaulted vehicle entrance surmounted by a round-arched gable with clock. In each side are 2 doorways, each with original boot-scraper and incised on the keystones "chief male attendant" and "private" to the south and "porter" and "private" to the north. Recreation hall attached to the north; red brick with a slate roof and cylindrical ridge ventilators. 5 bays long with central entrances

flanked by 2 groups of 3 staggered windows on each side. Each bay with segmental relieving arch of buttressed bricks. Interiors: with some original features but mostly plain. History: built as the Wiltshire County Pauper Lunatic Asylum following the 1845 Lunacy Act which required county asylums to be built.

PROPOSAL

The description is for 'Like for like replacement of the existing External door with fanlight, with no changes to the existing openings. This will return the elevation back to its original state.' The existing door is a modern composite replacement door, set within an older timber frame and fanlight above.

The proposed works are for the careful removal of the modern door and historic timber frame with single glazed fanlight and the replacement with a new timber door and frame, including single-glazed fixed fanlight.

RELEVANT PLANNING HISTORY

The property has not been subject to any related planning history, but the proposed replacement of windows and doors has been previously considered:

K/50640/LBC & K/50639/F

K/51324/F

Replacement of existing windows with double glazed sash windows - refused (and refused at Appeal)

K/54676/LBC

Installation of secondary glazing to windows - refused (and refused at Appeal)

K/54706/LBC

Repair/refurbishment of existing metal sash windows. – Approved with conditions

K/31419

Refurbishment and change of use to offices (renewal of application K/20502 previously approved) – Approved with conditions

K/33069

Conversion of existing buildings into 154 dwellings, erection of 17 new dwellings, change of use tennis court to car park, demolish existing clinic & erect new nursing home. – Approved with conditions

K/51329/LBC

Replacement of existing windows with single glazed wooden sash windows – refused

K/46182

Replacement of existing windows with new double glazed wooden sash windows with rationalised fenestration. – refused

Proposal / Summary

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.

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).

Historic England's publication 'Traditional Windows – Their Care, Repair and Upgrading (2017)' encourages the retention of windows and doors that contribute to the significance of listed buildings but sets also out their approach to the alteration/replacement of windows and doors and where this is acceptable in principle:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, they should therefore be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without harming the significance of the listed building. There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.
4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether

single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.

5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

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 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.

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.

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.

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.

Elm Court forms part of the Grade II listed Roundway Hospital, built originally as the Wiltshire County Asylum in 1849-51, from the designs of T H Wyatt who also designed the Assize Courts in the town. The hospital was designed to create a welcoming, homely feel, set in substantial grounds, mimicking a country house with its front elevation and setting within a designed, but informal landscape. The adjoining (former) farmstead associated with the hospital is also Grade II listed. At the time of construction, the design of the hospitals/asylums was considered to be highly important for patient care.

The building has since been converted into self-contained dwellings, and some changes have occurred to allow the conversion. Elm Court forms one of the wings of the original hospital and

has been subject to sensitive alterations to create a terrace of houses, set around a parking area. It appears that much of the original fabric remains to these elevations.

No. 7 retains the sash windows, with their fine glazing bars, but the main front entrance door is a modern replacement formed a composite door (with a plastic/ metal facing panel), set within its original frame with single glazed 6-pane fanlight above. The glazing bars to the fanlight are broader than the sash windows.

The adjoining properties to the left-hand side have had new door frames and doors, whereas some of the others to the right-hand side appear to be original. The application site appears to be the only one in the vicinity to have a composite door.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, spatial layout, architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest which should be read for group value.

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 work looks to replace the door and the frame, and as these are of different significance due to their age, they will be considered separately.

Door frame & fanlight:

From the information submitted, it appears the door frame and fanlight are original, and in good condition, but during the site visit it was possible to inspect the existing door and frame. It was clear that the bottom of the door frame had been subject to historic splice and filler repairs and alterations. The alteration works included the removal of the bottom of the door frame (doorstep) which provides a weathering detail to prevent water ingress into the property. Internally, it appears that a temporary covering piece has been inserted to cover some defects. This covering piece has a slight 'bounce', which raises concerns that there has been historic water ingress which may have caused some additional longer-term defects, such as rotten joist ends and which may require repairs. This should be investigated further by lifting the screwed down temporary cover to allow for inspection.

Within the submitted application, no details have been provided on whether the glass to the fanlight is historic or modern float glass. The loss of historic glass would not be supported, but it appears from the site visit that the glass is a modern float glass and of no significance.

Within the submitted information, there is no details of the existing glazing to the fanlight. Glazing details are important as these changed as fashions and technology advance. As this property forms part of a cohesive design, the details would need to match the existing/adjoining properties to retain the appearance of the group.

Additional information was requested and this present a proposed drawing of a double glazed (standard 24mm) opening casement detail, rather than a single glazed, fixed window that would be expected. The use of standard double glazing is not supported within listed buildings as the size of the unit often requires the framework to be increased to accommodate the weight and size. This principle has been applied consistently across the site as shown in the number of applications looking to replace the existing sash windows with new double-glazed windows which have all been refused and then dismissed at appeal.

In recent years, secondary glazing has become more acceptable within listed buildings to improve the thermal efficiency, but this requires specific considerations (as discussed above) but which do not apply here. The use of slim-profile double glazing can be acceptable in some situations, however, here, due to the proximity to the adjoining units, the visual relationship with the adjoining properties is important. Therefore, the use of a slim-profile glazing would not be supported. Under HEAN 16 Listed Building Consent and HEAN 18 Adapting Historic Buildings for Energy and Carbon Efficiency, the installation of secondary glazing does not require Listed Building Consent (LBC). This helps protect historic fabric and appearance, whilst offering thermal improvement, and could be a consideration for the fanlight if required. If the application was for a single glazed, fixed glazing, with the same glazing bars, this would be acceptable

The proposed replacement of the door frame would result in a loss of fabric, which would not generally be supported from a heritage consideration. The preferred option would be to scarf in new timber to the lower section of the door frame as this would retain the glazing and much of the fabric of the frame. The difficulty is the insertion of a doorstep to create a proper weathering detail, which will offer long term protection from further water ingress. Whilst the door frame is historic, the loss of the frame to create an improve detail in this situation is deemed justified. The careful replacement of the frame to match the existing (both in details and timber) will ensure that there is no further water ingress into the building which will protect the fabric in the long term.

Door:

From the information submitted, it appears that the door has delaminated in places, and the solid gloss effect would indicate that the door is a modern replacement door and is in poor condition. The submitted information advises that the door is in poor condition, raises security concerns and is drafty, and therefore should be replaced. This is not considered to provide clear and convincing justification for the loss of historic fabric. Within the submitted information there is no consideration for the replacement of the door only if the door has failed.

At the site visit it was confirmed that the door is a modern, composite door that has been repaired a number of times, though the overall quality of the door is poor. The proposed replacement with

a timber door (6-panel) to match the neighbours' property is supported. Confirmation of the ironmongery should be provided. The door should be hand-painted finish rather than factory finished as this makes a solid appearance.

Summary:

The level of information of the existing door and frame is limited and should be supported with detail drawings (such as 1:1; 1:5 or 1:10, details of the glazing bars, etc). Without this information, it is difficult to fully assess if the proposed replacement will replicate the correct details. The proposed drawing appears that a standard detail of an opening casement window with double glazed unit, rather than a fixed pane with integrated glazing bars, which is not suitable or acceptable. Additional information was requested, but limited information was provided either at the time of the application or following the requested.

The principle of replacing the door frame and fanlight is accepted in this situation due to the previous works that have removed an important element of the door frame that prevents water ingress into the fabric of the building and the poor quality of the existing composite door. It is accepted that the door has failed, and the proposed replacement with a solid timber door is considered to be a heritage benefit.

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?	NA
(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?	

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, but there is heritage benefit with the installation of a timber door and ensuring that the building is watertight. The proposals involve only part of the building and could therefore be considered as causing 'less

than substantial harm' (at the low end) for the purposes of interpreting the NPPF, but they should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 of the Act requires that any level harm caused should be taken seriously.

The impact of the proposals on heritage assets will be 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, subject to the following conditions.

RECOMMENDATION:

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

- Timescale
- Drawings – Site location and Proposed Elevations only
- WL6 EXTERNAL JOINERY DETAILS

No works shall commence on site until details of all new external door joinery and existing door joinery have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include depth of reveal, details of heads, sills and lintels, elevations at a scale of not less than 1:10 and horizontal/vertical frame sections (including sections through glazing bars) at not less than 1:2. The works shall be carried out in accordance with the approved details.