

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/01448
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	7 Court Mills, Polebarn Road, Trowbridge, BA14 7XH
DESCRIPTION OF WORKS:	Removal of graffiti from brick work and limestone on the north facing wall adjacent to the footpath.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The site comprises a former mill building in brick over a high ashlar stone plinth. The building is now converted into a terrace of town houses and the application relates to the northern end terrace. The end gable faces onto a public footpath leading from the Town Park in the centre of Trowbridge and the designated conservation area. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990. The list entry, for means of identification purposes only, provides the following description:

POLEBARN ROAD 1. 5411 (South West Side) Youth Centre, formerly part of Court Mills ST 8557 7/337 II

2. Set back beyond Courtfield House. Mid C19 3 storey factory. 14 windows. Red brick with regular header courses. Stone, ashlar, ground floor on boasted plinth. Stone quoins and 2nd floor cill band. Standard segmental headed mill windows with central mullions. Moulded raised stone architraves, bracketted cills, glazing bar casements. Rectangular windows on ground floor with raised dressings and keys. 5 segmental arched entrances, 2 blocked as windows. Steps to a 1st floor doorway in 2nd bay from left with moulded architrave. Stone gutter brackets to slate roof.

PROPOSAL

The application seeks consent for the removal of graffiti (some historic and some more recent) from the lower levels of the gable wall adjoining the footpath. The proposals also allow for the addition of a transparent sacrificial anti-graffiti coating over the area cleaned to make future cleaning easier.

RELEVANT PLANNING HISTORY

Proposal / Summary
PL/2025/01525 - Householder planning permission Decision - Approve with Conditions Date: 29/5/2025 – Retrospective application for decking in rear of garden of a listed building. Newly proposed erection of a 1.8 metre timber fence to replace existing metal fence.

18/03020/FUL - Full planning permission Decision - Approve with Conditions Date: 19/6/2018 – Proposed conversion and change of use of vacant Grade 2 Listed Building to 7 3 & 4 bedroom town houses together with parking and ancillary works including demoliton of single storey rear extension.

18/03469/LBC - Listed building consent Decision - Approve with Conditions Date: 19/6/2018 – Proposed conversion and change of use of vacant Grade 2 Listed Building to 7 3 & 4 bedroom town houses together with parking and ancillary works including demoliton of single storey rear extension.
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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).

Historic England Graffiti on Historic Buildings – Removal and Prevention 2021

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 and its features of special architectural and/or historic interest.

CONSULTATION RESPONSES

Trowbridge Town Council – 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.

No responses were received.

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 the application is accompanied by a short statement which provides sufficient information to understand the proposals and their impact. In addition, Paragraph 208 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.

The significance of the building derives principally from its historic fabric and architectural form. Its scale and massing reflect its historic function and illustrate the importance of the cloth trade to the town’s development. The building’s design and use of materials are of considerable architectural and aesthetic interest and are characteristic of the local vernacular. Alongside the other historic mills within the River Biss corridor, it makes a strong positive contribution to the character and appearance of 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 212-221 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The gable end of the building lies alongside a well-used but secluded footpath leading from the Town Park. There has clearly been an ongoing problem with graffiti to the buildings on both sides of the path for many years. Much of this has become blurred over time but the applicant is concerned that recent graffiti on the stone plinth will attract further attention. The proposals utilise well used and tested methods for removal – a proprietary paint softener from a specialist masonry cleaning company, followed by steam cleaning using the DOFF superheated steam cleaning system. This operates using high temperature and low pressure and allows coating and contaminants to be lifted from the surface without damaging the masonry or mortar.

Following cleaning, the proposals allow for the application of a transparent colourless sacrificial anti-graffiti coating. The product is water based and intended to be sacrificial and breathable, forming a thin layer which allows any future graffiti to be removed more easily without damaging the masonry. Historic England guidance (Graffiti on Historic Buildings – Removal and Prevention 2021) notes the use of such coatings “Where there are repeated incidents of graffiti and an associated risk of damaging surfaces from recurrent cleaning, anti-graffiti coatings are often employed.” The proposed coating is of a temporary ‘sacrificial’ type noted by Historic England as being more suited to historic masonry and typically based on aqueous wax emulsions which can be softened and removed (along with new graffiti) by similar cleaning methods if required. The guidance notes that “They are invariably sacrificial and microporous and will weather back in time, normally after a few years. Where there is naturally high water movement from within the substrate, the wax coating will fail (yield in small flakes) rather than seal the surface”.

In this case the stone plinth shows some signs of deterioration and care is required. However, the proposals have been appropriately formulated and will be carried out by specialist contractors and it is considered that appropriate measures have been put in place to limit any damage. The method statement limits the extent of the works to the area which is currently graffitied and where removal is required. It is desirable to remove the graffiti, for both aesthetic reasons and to prevent it damaging the stone works or attracting further anti-social behaviours and the proposals are therefore considered to be justified.

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
(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): none required.

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.

Masonry cleaning and the addition of coatings can cause harm to sensitive historic fabric but in this case the proposals have been carefully formulated in accordance with Historic England guidance to limit any harm and are considered to be justified by the benefits from the removal of the unattractive graffiti from the building. The requirements of current conservation legislation, policy or guidance are therefore considered to be met and the application is proposed for approval.

RECOMMENDATION:

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

Time scale

Plans list

Site Plan (annotated to indicate wall to be cleaned) 13 May

Method Statement 20 March