

HERITAGE STATEMENT

In respect of:

**PROPOSED CHANGE OF USE OF FIRST FLOOR FROM OFFICE TO 2 NO.
RESIDENTIAL UNITS**

At:

38B MARKET PLACE, WARMINSTER, BA12 9AN

On behalf of:

Mr Frederick Mead

Date:

July 2026



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1.0 Introduction

- 1.1 This heritage statement accompanies applications for planning permission and listed building consent the change of use of the first floor of 38B Market Place from an office to 2 No. residential units. The statement is required because Nos. 38 & 40 Market Place is a listed building and is located within a conservation area.
- 1.2 Nos. 38 & 40 Market Place comprise a three-storey Bath stone building on the south side of Market Place, within Warminster town centre. To the rear are one- and two-storey stone and brick ranges extending into a long, narrow plot. The application site, 38B Market Place, occupies the first floor of Nos. 38 & 40.

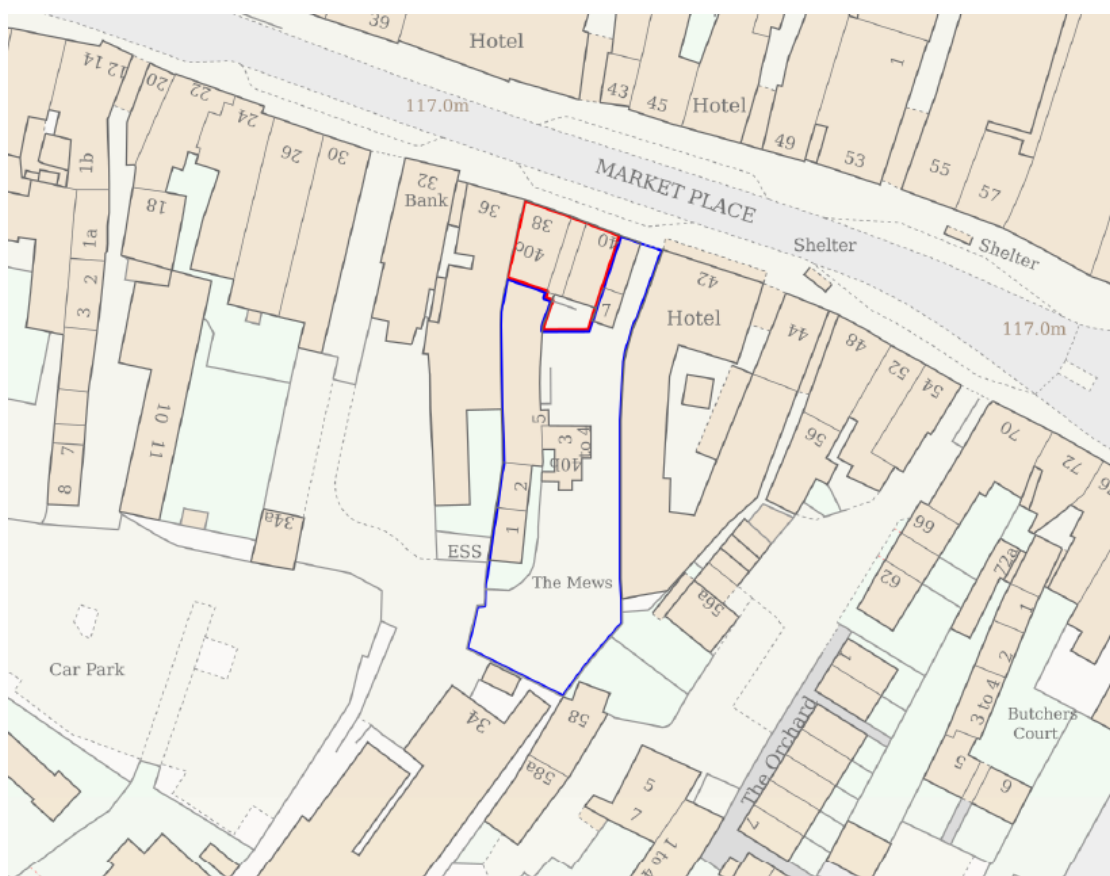


Fig.1 Location plan

- 1.3 The report describes the heritage significance of the application site and the impacts of the proposed development in accordance with the requirements of the National Planning Policy Framework (the NPPF, revised December 2024).
- 1.4 The report was commissioned by Mr Frederick Mead and has been prepared by Elaine Milton BSc (Hons) MSc DipArchCons MRTPI IHBC, an individual with 'appropriate expertise' as advised by paragraph 207 of the NPPF. A site survey was undertaken on 15 January 2026.

- 1.5 The significance of the site was identified using the guidance contained within the Historic England documents *Conservation Principles, Policies and Guidance* (2008), and *Statements of Heritage Significance: Historic England Advice Note 12* (October 2019).
- 1.6 Information on the history of the site has been drawn from various sources, including historical map regression. A list of the sources used is presented on p23.
- 1.7 Applications for planning permission and listed building consent were originally submitted in 2025 for the change of use of the first floor from office to 2 No. residential units (reference PL/2025/09279). The conservation officer although supportive in principle of the proposed change of use objected to the detailed proposals and the application was consequently withdrawn. The issues raised by the conservation officer were:
- Insufficient information to assess the proposals – a detailed heritage statement is required;
 - Concern over the impact on the building's plan form and fabric particularly from the splitting of the central hallway by filling in the archway and from the position of the proposed party walls;
 - Concerns over the proposed raising of floors for service runs;
 - Lack of detail on the impact of the necessary acoustic and fire measures required under the Building Regulations;
 - Missed opportunity for enhancement of the rear elevation from replacement of the unsympathetic porch and the unsightly pipework.

2.0 Heritage Designations

- 2.1 Nos. 38 & 40 Market Place were added to the *List of Buildings of Architectural or Historic Interest* at Grade II* on 28 April 1952 with the listing amended on 31 March 1978. The list description reads:

'Late C18/early C19. 3 storeys. Bath stone ashlar with rusticated ground floor treatment and full height angle pilasters. Projecting plinth and plain strings at each floor. Triglyph frieze, moulded bracketted cornice and plain parapet. Entablature broken forward over pilasters and central bay which has slight projections. 3 ranges of windows to upper floors, glazing bar sashes. On ground floor, modern bowed glazing bar window replaces door in deep splayed recess with keystones. Modern shop front with glazing bars and fluted pilasters to left. Excellent mid-Victorian polychrome shop front to right; recessed splayed centre flanked by colonnettes with floral caps, plate glass windows with cast-iron fretwork in upper corners, panelled outer pilasters to fascia which has scrolled brackets and modillion cornice. 2 storey lean-to extension to left of one bay with modern 6 panel door in architrave surround and arched fanlight and one window above (later addition, see brick side wall). 3 wide bays at rear. Coursed and squared rubble; low single storey extension links with mid C19 2 storey 5 bay stable building, built of coursed and squared rubble with brick quoins and dressings and, to left, lacing courses; old tile hipped roof.'

- 2.2 The listing notes the contribution made by Nos. 38 & 40 Market Place to group value (denoted by GV). The list description references the 5-bay former stable building to the rear of the property. There is a high proportion of listed buildings within Market Place, including the Grade II listed No.36 to the west and The Old Bell public house to the east.
- 2.3 The property is located within the Warminster Town Centre Conservation Area, which was first designated by the local authority in 1973. The conservation area is centred on the linear element of the town, which runs from West Street to East Street with four roads leading off in northerly and southerly directions.

3.0 Description

- 3.1 Nos. 38 & 40 Market Place comprise a three-storey former townhouse constructed in Bath stone ashlar with rusticated base and quoins and with string courses at each floor. On the ground floor are shopfronts – a modern timber multi-paned shop window with pilasters and fascia on the left (No.40), and to the right (No.38) an ornate Mid-Victorian shopfront having cast iron columns and fretwork to the glazing. The upper floors are of a five-bay window arrangement with multi-pane sliding sash windows having slender glazing bars. The building is terminated by a moulded cornice and parapet concealing a pitched roof.



Fig.2 Front of Nos. 38 & 40 Market Place (No.38 on the right and No.40 on the left)



Fig.3 Ornate Mid-Victorian shopfront with cast-iron columns and fretwork

- 3.2 Attached to the east (left) side is a two-storey lean-to stairwell extension having a stone façade and brickwork side and rear. The back of the building is of rubble stone with dressed surrounds to the openings. The first floor is accessed via an external staircase enclosed by brick walls. The back door is a modern half-glazed door with an arched fanlight. There is a modern canopy above the door that currently cuts across the fanlight.



Fig.4 Back of the building; external steps to the first floor



Fig.5 Canopy over the back door cutting across the fanlight

- 3.3 The rear door enters the rear stairwell and an inner (modern flush-panel) door to the first-floor landing. Within the landing is a basket arch opening with panelled reveals, with the arch providing a demarcation between the grander 'principal' rooms at the front of the house and the plainer rooms at the rear. Each of the rooms is served by six-panel doors in moulded architraves, with the doors on the east side (i.e., to Rooms 6 & 7) having panelled reveals.



Fig.6 Arched opening within the landing

- 3.4 Room 1 (left-hand rear) features a timber fireplace with a cast iron insert, windows shutters and a historic built-in panelled cupboard (to the right of the fireplace).



Fig.7 Room 1 (left-hand rear) – simple timber fireplace and historic built-in cupboard

- 3.5 Room 2 (left-hand front) features a mid-Victorian grey marble fireplace with deep console brackets, reeded cornice, picture rail and window shutters.



Fig.8 Room 2 (left-hand front) – mid-Victorian grey marble fireplace in west wall

3.6 Room 3 (central, front) is a small room featuring a picture rail and window shutters.

3.7 Room 5 (rear, left of staircase) is a narrow room with WC.



Fig.9 Room 5 - WC at the rear of the first floor

3.8 Room 6 (right-hand rear) features fireplace with timber reeded surround and cast iron insert, and window shutters.



Fig.10 Room 6 (right-hand rear) - note general plainness, lack of cornice etc

- 3.9 Room 7 (right-hand, front) features a timber fire surround (fire blocked up), reeded cornice except for the south (rear) wall, and window shutters. The rear wall is plasterboard at the centre where there was a former wide opening between the front and rear rooms.



Fig.11 Room 7 (left-hand front)

4.0 History

Evolution

- 4.1 The earliest reference to a settlement at Warminster is from the early 10th century when it was by then an established settlement. The development of Warminster into a relatively prosperous town was based on its corn market, first mentioned in the 13th century and which continued to be successful for over 600 years, forming an important commercial centre for the region's farmers.
- 4.2 The corn market boomed until the mid-19th century, largely due to the fact that the town was by then on important trading routes between London, Bristol and the South. Other industries that flourished in the 18th and 19th centuries were malting and inns, which were related to the local farming industry, and iron, cloth and leather manufacturing, all of which have left their mark on the town.
- 4.3 Warminster's prosperity is reflected in the wealth of buildings between the 17th century and the 18th century. In 1796 Warminster was described by the agriculturist Arthur Young as a 'stone town', and cottages from this date predominate in Vicarage Street, West Street and Pound Street. Brick was typically used from the mid-18th century onwards although better quality homes employed Bath stone for the main walls or dressings.
- 4.4 By the first half of the 19th century Warminster's clothing trade had collapsed. The market suffered for a time from the competition of other towns with better communications but the increase in retail trade, and new occupations such retail, grocery and ironmongery made up for the loss of the clothing trade in the second half of the 19th century.
- 4.5 It was during Warminster's transitional period in the first half of the 19th century that the property that was to become Nos. 38 & 40 Market Place was built. Originally The Bush Inn, 14 Market Place, the property was owned by William Slade who sold it in 1803 to Uriah Broadribb, as local businessman who then pulled it down. He built what we see today as a shop with living accommodation above for himself and servants between 1807 and 1809 for around £3900. The rear housed a two-tier barn-like building for storing provisions, and two stables for horses, a cart shed, a walled garden and other outbuildings.
- 4.6 The building descended through the Broadribbs and was finally rented to Mr Mayo who was in partnership with Mr Wilson. They previously had a shop in the town trading as grocers but moved the business to No.14 as Wilson and Mayo Purveyors of High Class Provisions, Wine, Spirits and Beer.

- 4.7 James Bott Kennard entered into a partnership with Mr Wilson c1900 and the business became Wilson and Kennard. It became a limited company in 1923 and continues today.
- 4.8 In 1966, the Market Place was renumbered and No.14 became Nos. 38 & 40. The property passed to Cyril Kennard who sold it to Peter Mead in 1973, who kept it as a provisions shop until it closed in 1988.

Historic Mapping

- 4.9 Nos. 38 & 40 Market Place appear on the Tithe map of 1840 as a main front block within a large plot, with separate outbuildings (the former coach house and workshops) to the south.



Fig.12 Tithe map of 1840

- 4.10 By the late 1800s, the rear of the property appears to have been linked to the outbuildings, giving the building the footprint that remains evident today.

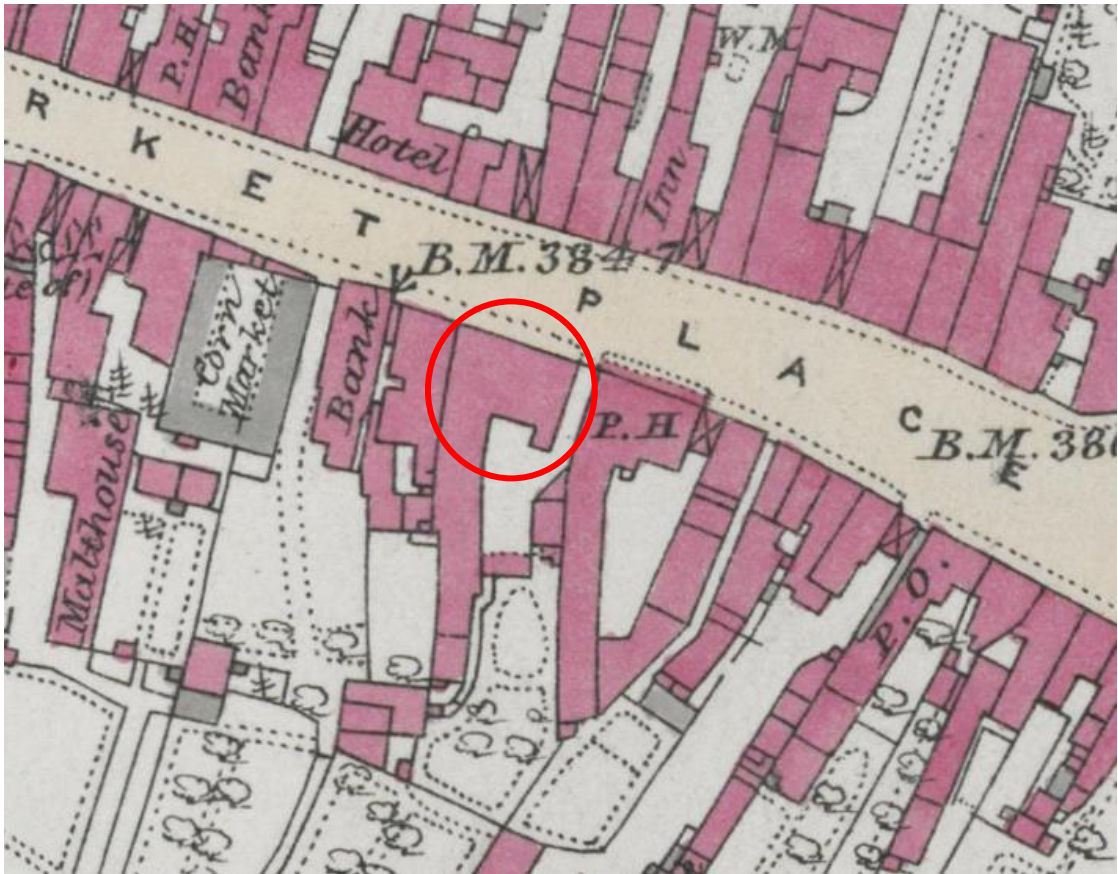


Fig.13 1887 Ordnance Survey map

5.0 Assessment of Significance

Listed Building

5.1 38B Market Place forms part of a Grade II* listed building, a designated heritage asset of more than special interest and within the top 9% of listed buildings nationally.

5.2 The listed building is of significance for the following reasons:

- The property is a good example of a Regency/early Victorian townhouse and shop, distinguished by an unusual and ornate original shopfront at ground-floor level;
- The property is of historic value for its association with a notable local retailer.
- The front façade is of substantial aesthetic value for the high-quality Bath stone walls, bracketed cornice, ornate shopfront having pilasters with scrolled brackets and cast-iron fretwork to the glazing, and the pleasing disposition and detail of the multi-pane sliding sash windows with slender glazing bars;
- The quality of the frontage reflects the original high status of the property within the town;
- The quality of the interior and proportions of the rooms reflect the hierarchy between the principal reception rooms at the front and the bedrooms at the rear;
- The interior of the first floor (38B) and original main living space contains a good proportion of architectural features including (but not exclusively) the panelled basket arch within the first-floor landing, grey marble fireplace with deep console brackets (Room 2), reeded cornices (front reception rooms - Rooms 2 and 7), windows shutters, historic built-in cupboards (Room 1), and six-panel doors (Rooms 6 and 7 having panelled reveals);
- The original plan form remains legible - central landing area with rooms accessed directly off it.

Contribution to the Warminster Town Centre Conservation Area

5.3 Market Place is characterised by traditional two- and three-storey buildings, commonly constructed in ashlar stone, rubble stone or brick, with clay tile or slate roofs, and generally positioned at the back edge of the pavement. Nos. 38 & 40 Market Place reflect this established townscape character.

- 5.4 Nos. 38 & 40 Market Place provide a good illustration of Warminster's early- to mid-19th century built heritage and reflect the town's transition from cloth manufacturing towards retail, grocery and other commercial uses.

6.0 Proposals

6.1 The current applications are for the conversion of the first-floor office to two apartments. The scheme has been revised since the 2025 submission (reference PL/2025/09279) to take account of the conservation officer's consultation response and the independent assessment of significance.

6.2 The focus of the revisions has been on:

- Minimising the impact on plan form and room proportions, particularly the principal reception rooms at the front and the first-floor landing;
- Minimising the impact on historic fabric and the maximum retention of architectural features, such as doors and architraves;
- Maximum reversibility;
- Restoration of lost features, such as cornices;
- Consideration of the Building Regulation requirements as part of the scheme design.

6.3 The key differences from the 2025 scheme are:

- Unit 1 (eastern half of the first floor) would utilise the existing entrance stairwell on the side of the building;
- Unit 1 would be separated from Unit 2 along the existing wall line, retaining the doors (fixed shut and lined out on one side to provide the necessary acoustic and fire separation);
- Unit 2 designed would retain the first-floor landing space and leave the archway open;
- Historic cupboard to be retained in Room 1;
- Redesign of the layout to enable the omission of the raised floor (for routing pipework) for the bathroom in Unit 1;
- Replacement of the entrance canopy on the back of the building with a flat canopy that exposes the fanlight above the doorway.

6.4 The main aspects of the proposals are:

- The subdivision of the first floor along an existing wall line to create two flats – Flat 1 to the east and Flat 2 to the west – Flat 1 to be served by the existing side entrance and Flat 2 to be served by the existing rear entrance;

- Internal doors retained in situ and visible from the landing; doors fixed shut and lined out on the party wall line with sections of 60-minute fire-rated wall with acoustic insulation on the room side to meet the Building Regulations;
- The cornice in the proposed Lounge/Kitchen/Dining of Flat 1 to be retained but new matching section formed where wall is to be built out and where missing (south wall) (Note, no cornice exists in the existing rear room);
- Reopening part of the blocked opening between the front and rear rooms;
- Rear room of Flat 1 subdivided at the northern end to create Bathroom, Hall and Cupboard, existing fireplace and window shutters retained;
- First-floor landing and archway retained open and six-panel doors retained in situ;
- Front rooms of Flat 2 to remain unaltered including the retention of the picture rail and window shutters in Bedroom 2 and the grey marble fireplace, window shutters and cornice in the Lounge/Kitchen/Dining;
- Lobby and Cupboard formed at the northern end of the rear room in Flat 2 for Bedroom 1
- Replacement of the flush fire door off the existing stairwell (front door of Flat 2) with a timber panelled fire-rated door;
- Removal of the existing canopy and replacement with a flat-roofed canopy on brackets set at door-height level to expose the fanlight;
- New soil vent pipe to serve Flat 1 (emerging from above the string course between the ground and first floor).

7.0 Policy Context

Primary Legislation

- 7.1 A statutory duty exists under section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') for the local planning authority in considering whether to grant listed building consent for development that affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 7.2 Section 72(1) of the Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy

- 7.3 National planning policy relating to the historic environment is provided within section 16 of the NPPF (revised December 2024). It advises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.
- 7.4 Paragraph 212 of the NPPF advises 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Any harm or loss to a heritage asset's significance should require clear and convincing justification and needs to be weighed against identifiable public benefits. Substantial harm or loss of a Grade II listed building should be exceptional.
- 7.5 Paragraph 214 of the NPPF advises where proposals would lead to substantial harm to the significance of a designated heritage asset, the proposals should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of four listed criteria therein apply.
- 7.6 Paragraph 215 advises that where proposals would lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed

against the public benefits of the proposals, including, where appropriate, securing its optimum viable use.

- 7.7 Paragraph 219 of the NPPF advises that local planning authorities should look for opportunities for new development within conservation areas or the setting of heritage assets to enhance or better reveal their significance.

Development Plan Policy

- 7.8 The statutory duties are reflected in the *Wiltshire Core Strategy* (WCS), which was adopted by Wiltshire Council on 20 January 2015. Core Policy 58 of the WCS seeks to promote the conservation and, where possible, enhancement of the county's historic environment.

Supplementary Planning Guidance

- 7.9 The *Warminster Town Centre Conservation Area Character Assessment* was adopted as supplementary guidance by the council in April 2007. The document provides an overview of the character and appearance of the conservation area and identifies some 'opportunities' for enhancement but does not contain specific development management policies.

Best Practice Guidance

- 7.10 It is advisable that proposals for repair, restoration and alteration of heritage assets follow the guidance within the *Historic England Advice Note 2: Making Changes to Heritage Assets* (HEAN2, February 2016). The document acknowledges (paragraph 3) that the best way to conserve a building is to keep it in use, and that a '*reasonable and proportionate approach to owners' needs is therefore essential*'.
- 7.11 As a general principle for adaptation, HEAN2 advises as much of the historic fabric and plan form that contributes to the significance of a heritage asset should be retained as possible, with new work ideally being reversible. Harm to significance may be justified on grounds of overriding public benefit that may accrue including maintaining the building in its optimum viable use.
- 7.12 HEAN2 also advises that some of the issues to consider in respect of new additions are proportion, height, massing, bulk, materials and setting, and that new work

should not dominate the existing in terms of scale, material or siting. The guidance advises that an assessment of the asset's significance will usually suggest an appropriate form of any extension.

8.0 Heritage Impact Assessment

- 8.1 The proposed change of use would return the first floor from office accommodation to residential use, reflecting its original domestic function. The scheme would also secure the beneficial use of an underused upper floor within a town centre location and provide two new residential units.
- 8.2 By using the existing side entrance and subdividing the flats along an existing wall line, the scheme would respond sensitively to the building's established plan form and historic fabric.
- 8.3 The original architectural features would be retained throughout the interior including the basket archway, cornices, window shutters and historic built-in cupboard. Enhancement would occur from the removal of unsympathetic features, e.g., the modern flush-panel entrance door to Flat 2.
- 8.4 The blocked opening between the front and rear rooms would be reopened, reinstating the former plan form of the rooms.
- 8.5 The layout of the principal reception rooms at the front of the building would remain intact.
- 8.6 There would be a minor impact from the subdivision of the rear rooms of the first floor necessary to provide bathroom facilities and lobby areas.
- 8.7 There would be a low level of impact from the fire-rated and acoustic insulation panelling adjacent to the doors of Flat 1. The doors would remain in situ and visible onto the landing space, where they contribute to the ensemble of features around the central archway. The works would be reversible.
- 8.8 There would be small degree of harm from the building out of the cornicing in the front room of Flat 1 where the panel separation is to be located but also benefits from the reinstatement of the cornicing where it is missing on the south wall of the room.
- 8.9 The exterior of the building would be improved from the removal of the unsympathetic canopy over the rear door and its replacement with canopy of more appropriate design and one that exposes the original fanlight opening.
- 8.10 The new soil vent pipe would have a minor impact on the exterior being a relatively short run, at low level and on the less prominent rear elevation.

9.0 Conclusion

- 9.1 38B forms part of a Grade II* listed building within the Warminster Conservation area, and as such it is of very high significance, this mainly deriving from the aesthetic value of the front elevation and the wealth of architectural features dating from the early- to mid-19th century.
- 9.2 The proposals have been revised to respond to the conservation officer's concerns from the 2025 submission and to minimise intervention in the building's historic plan form and fabric. The subdivision between the proposed flats would follow an existing wall line, the first-floor landing and archway would be retained, and the principal front rooms and their architectural features would remain largely unaltered.
- 9.3 Where impacts would arise, these would be limited in scale and largely confined to the subdivision of rear rooms, the provision of fire and acoustic separation, and minor external service alterations on the less prominent rear elevation. These works would preserve the key elements of significance and, where possible, would be reversible.
- 9.4 The scheme would also deliver heritage benefits through the continued beneficial use of the upper floor, the return of the first floor to residential use, the retention and reinstatement of architectural details, and the replacement of unsympathetic modern elements, including the rear canopy and flush-panel entrance door.
- 9.5 Harm to the listed building would be at the lowest end of less than substantial harm and would be outweighed by the public and heritage benefits of securing an appropriate, viable and sympathetic use for the first floor.
- 9.6 The proposals would preserve the character and appearance of the Warminster Town Centre Conservation Area.
- 9.7 The proposals are therefore considered to accord with the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, the relevant provisions of the NPPF, Core Policy 58 of the Wiltshire Core Strategy, and best practice guidance relating to the conservation of heritage assets.

Sources Used for the Report

Publications

Conservation Principles, Policies and Guidance (English Heritage, April 2008).

Historic England Advice Note 2: Making Changes to Heritage Assets (HEAN2), Historic England, February 2016.

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (GPA3, 2nd edition), Historic England, December 2017.

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Historic Mapping Consulted

Warminster Tithe map of 1840.

Ordnance Survey map: 1887.

Other

Note from the Wiltshire Buildings Record, Wiltshire and Swindon Records Office, Chippenham dated 14 October 2019.