

Wiltshire Council Planning Consultation Response

17 August 2026

Janice Gooch
Senior Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Joe Leesam
Officer's Title: Planning Officer

Application No: PL/2026/03827 & PL/2026/04644
To divide the existing two storey house into two houses.
39a New Park Street, Devizes, SN10 1DT

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 enhancing 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

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

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." It is also required that distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

Wiltshire Council's Core Strategy Policy CP57 '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.

Proposal: To sub-divide the property into two dwellings.

Relevant planning history: K/56210/F - Conversion of existing dwelling into 2 dwellings & erection of boundary wall to divide garden.

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 and Access 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.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of high-quality design materials which have significant aesthetic and architectural interest, and which contribute to the character of the conservation area.

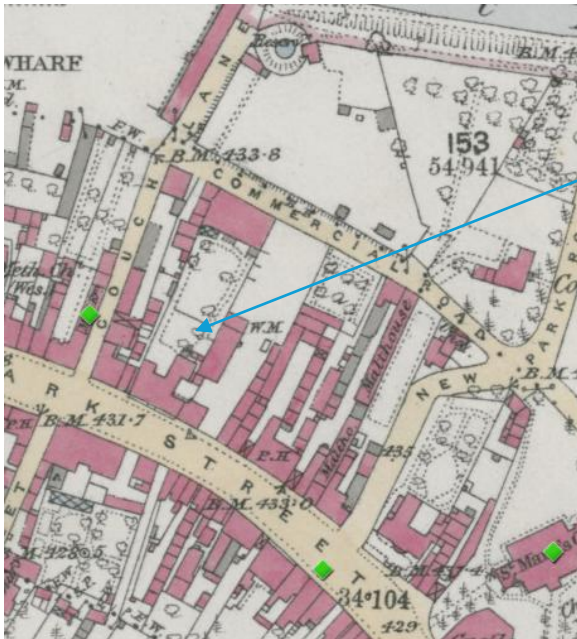
The Devizes Conservation Area Statement (September 2005) notes:

New Park Street is now used as a through route for passing traffic. The architecture here is varied with a number of historic buildings of quality. Interspersed between the frontage buildings are mid to late 20th century developments, many of which are set back from the road and thereby create a visual break in the street scene. The curve of the street presents a constantly changing picture.

New Park Street and New Park Road relate to the ‘New Park’ (first recorded in 1157), now Roundway Park, to the north side of the canal. New Park formed one of two estates owned by the Earls of Pembroke, with Old (or Great Park) SW of Castle, which was mainly a Deer Park. Both parks formed a Dowry for Henry VIII’s wife Katherine Parr (1512-48). The Pembroke’s sold New Park in the early C17, and was later purchased by one of the local families, the Suttons, who gained wealth from trade and commerce, employing the leading architect and garden designer of the day to create a large country estate in the late 1700s, and renamed the estate as Roundway Park. Therefore, the importance of these two roads named after the estate needs to be recognised.

The first OS map (844-1888) shows New Park Street with mainly small, narrow buildings, with the public houses appearing to be the widest buildings to the west end of the street, though the scale of the buildings increases as the street heads east, including some large dwellings with large gardens, such as 39 New Park Street. In the C18, New Park Street was generally residential to traders and manufacturers.

39 New Park Street, formerly known as The Hazeldans, originated as a C15 timber framed building, offering a parlour, two-bay open hall and service end, which run along the roadside. The house was re-fronted on two occasions, first in the C17 when other substantial works were undertaken, including one of the rear extensions and then again in the late C18/ early C19 where its plain Georgian front and stone columned porch was added. The rear of the building includes various extension from the C16 onwards. The influential Nicholas family lived at the property during the C16, C17 & C18, selling the property (1780) to John Antsie, whose factory (one of the first in the SW) lay directly opposite. To the rear was ‘a barn, stables, outhouses, garden and orchard.’ The house has since passed through several hands and has been sub-divided into two dwellings.



2nd Ed. OS Map (1894-1903). Site highlighted by blue arrow.

The submitted application contains no information on the interior of the building, but on the site inspection it was noted that the house has evolved organically, with a mix of original features responding to the changing ownership and tastes, as well as some more modern (mid-C20) interventions to allow the property to be lived in by modern standards. Whilst No.39A is only half of the original building, it remains a substantial dwelling. The existing property is formed over two floors, with 5 reception rooms, plus hallways and lobbies, to the ground floor, and 5 bedrooms, a family bathroom and shower room to the first floor.

The small store within the courtyard is a later addition, and of limited significance. The rear boundary wall is formed of brick (though fronted in the public realm with a modern block, and therefore the boundary wall is considered to be of significance (and curtilage listed).

Assessment: The proposed scheme forms part of a longer-term plan (as explained by the owner at the time of the site visit) to sub-divide the existing dwelling to form two self-contained properties. There is an anomaly therefore with the application and the current owners wishes. However, the application as submitted, will be considered.

There is an inconstancy with the drawings as the existing ground floor plan is missing a staircase, though shown on the proposed and the first floor existing.

The proposed works include:

- Southeast Elevation
 - The proposed scheme looks to block in the existing 'doorway' and create a new 'doorway' within the existing outbuilding. The existing door is a gate opening within a boundary wall which allows access into the rear yard. The proposed 'doorway' is a new gated opening within the curtilage listed wall to allow access to the rear garden (House 2).

The existing outbuilding/ store is a single storey building with a single pitched roof (formed of corrugated fibre). The store is an ad-hoc building, with a small window opening that has been covered. It is formed of a mix of brick and has been subject to alterations. The loss is considered to be acceptable.

The creation of a new opening within the historic brick wall will result in a loss of fabric, however, this is considered minimal but is considered to be acceptable. Details of the new lintel will need to be provided.

The existing boundary wall where the current store is low-level and no details have been provided to advise if the wall will be raised in height to match the remaining boundary wall, or if any other form of boundary treatment will be considered or required to screen the courtyard from the car park of the commercial unit. A close boarded fence will not be considered acceptable in this location.

The proposed works will include a new boundary wall to separate the courtyard for proposed House 1 and the gated access to proposed House 2. No details of this boundary treatment have been provided. The historic OS maps show that this was a separate courtyard and therefore the principle is acceptable. Details on how the boundary will be formed need to be provided.

- Internal Alteration
 - Ground Floor
 - As previously advised, there is a discrepancy within the drawings to the ground floor staircase. This is an existing staircase (as seen on the site visit).
 - Creation of a kitchen and separate Utility Room within the existing Bedroom. This room is a large formal room and seems to have been added after the 1st Ed. of the OS maps (1844-1888) and before the 2nd Ed (1894-1903). There is limited architectural detail in the room, with a flat ceiling (with downlights) and window/doors to the rear courtyard.

The proposed scheme would require the installation of additional services to support the use as a kitchen and the sub-division of the space to form a Utility Room. It has not been clearly demonstrated why a separate Utility Room is required as sub-division would result in some harm to the understanding of the space. The principle of the creation of a kitchen is acceptable. A condition of the proposed installation of the services should be included.
 - Insertion of new wall to divide the building between the existing hall and playroom. No details have been provided on how this will be undertaken. No consideration of the potential impact on any existing joinery details, etc. has been provided within the application. This infill will require to be fire/ acoustic separation as it will form a Party Wall between the two properties.

The existing door is a late C19/ early C20 four panel door and is considered to be of limited historic significance. However, the opening is of some significance, and the proposed infill solution should recognise that this was a door opening. The details of the infill construction should be provided.
 - Insertion of new wall and WC to make a ground floor cloakroom. No details of how this will be inserted, the location of any SVP, etc. To enable this to become a WC, it is required to infill an existing doorway, and no details have been provided on existing door.

The site visit allowed for inspection of this space, and it is evident that this is a later infill section as it has a flat roof. The principle of the loss of the modern door and the infill to create a window is acceptable. The proposed installation of a WC is acceptable in principle, though details of the walls and the services are required.
 - Formation of a new door. No details on the existing fabric are provided. It is unclear if there is a loss of historic fabric or plan form.

The site visit allowed for inspection of this space, and it is evidence that this is a later addition with a flat roof. The principle of the formation of a new door is acceptable, though details of the door are required.

- Loss of external store. No details on the fabric provided. No details of how the boundary wall will be made good.
The site visit allowed for this building to be assessed. Whilst it has elements of older brickwork, it has been subject to changes and alterations which have had incremental impacts on the significance. The loss of the store is considered to be acceptable in principle.

○ First Floor

- Insertion of new walls to Bedroom to create family bathroom and ensuite. No details provided on the installation of these walls or the services to create the bathrooms. No details on the impact on the floor plan or any historic fabric have been submitted as part of the application.
To create a family bathroom, there will be a requirement to create a new opening. No details provided.
Following the site visit and some research, this part of the building appears to be added after the 1st Ed of the OS maps (1844-1888) and before the 2nd Ed (1894-1903). There is no information to advise that this structure can take the additional loading of a shower.
As this room abuts the historic core of the building (C15 timber frame), the increase in moisture has the potential to cause harm to the historic fabric, and therefore careful details need to be undertaken to protect the frame.
The creation of the new doorway may be in a position of historic or significance timber frame, and therefore some further investigation into the age and construction of this wall is required prior to consideration that the new opening would be acceptable. The historic timber frame could be mis-interpreted as a 'stud wall', and therefore the cutting of a historic timber frame could result in the loss of structural integrity to the structure.
- The shower room is currently accessed from the central landing, and it is proposed to alter the access to create an ensuite to Bedroom 1 (House 2). The existing access will be closed, and a new entrance formed. A WC will be inserted and no details on any SVP have been included. The submitted plans are incorrect as the existing door is from the landing into the shower room, and not to from the bedroom.
The existing door is of historic value, and the layout of the doors on the landing are of significance. The loss of the door and the floor plan is not supported; however, it may be possible to overboard the door within the existing Shower Room, allowing the door and frame to remain in-situ. The Shower Room is a later addition, and therefore the creation of a new door in the modern stud wall is acceptable.
- To allow for the sub-division of the spaces, it is proposed to infill the door opening between the landing and the rear corridor. This door is of historic value and significance, and the link forms part of the understanding of the building. It is suggested that the door & frame is retained, and over-boarded from the proposed rear corridor side. This allows for the retention of the historic fabric and understanding of the plan form to be retained.
- To allow for the creation of a bathroom (House 2? No door is shown on the proposed plan), then the dividing wall will be altered/ relocated and a new opening formed.

There is no information on the age of the fabric, or how this will impact the building. No details on the services included.

During the site visit, it was advised that the bathroom was originally located here, and that it was moved by the current owner into the existing location. The existing door (shown to be blocked up on the proposed plans) will remain to allow access to the bathroom, and the existing door from the bedroom to the corridor will be relocated to allow access off the central landing. There are concerns that the existing space is insufficient to create the additional opening. As with the other proposed openings, further information on the construction of the wall is required to ensure protection of any historic fabric and prevent the loss of any structural elements without due care and consideration.

- The existing bathroom is proposed to be converted into Bedroom 3. This will remove the fixtures and fittings. This is acceptable in principle.

The submitted scheme raises several queries due to the limited information provided. As the proposed layout will result in the creation of two units, this would result in Building Regulation requirements, in particular fire separation, that could have an impact on the historic fabric. The works required to up-grade the existing fabric will need to be considered as part of the initial design stage. This will include upgrading walls to allow for fire separation, and therefore the impact of the historic fabric (lath & plaster and joinery details).

The proposed works would result in a loss of plan form and have a potential to result in a loss of historic fabric (joinery, doors, etc.) that need to be considered. This is particularly important as the main building is dates from the C15, with interventions in the C17, and is timber framed. The information submitted was limited.

The site visit identified a mix of interiors, with some elements being of high significance, such as some internal doors, floors and finishes. This includes the two doors on the landing, which can be retained with an amendment to the plan. Other aspects require clear and convincing justification, such as the creation of the Utility Room, or clarity on the construction details of existing/ proposed works.

The proposed further sub-division of the building is considered to cause some harm to the significance of the building, but consideration of the location of the large house within the town centre location on a very busy road and adjacent to industrial buildings. In this situation it is reasonable to assume that the scale of the house is unlikely to have a wide interest as a single dwelling, and therefore the proposed sub-division is considered to be a sensitive way forward to allow for the protection and long-term sustainable use of the listed building. The principle is therefore acceptable, but some amendments to the proposed plans and further details are required to reduce the harm as far as possible.

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 impact of the proposals on heritage assets are likely to cause a low level of less than substantial harm, but the long-term sustainable use, as proposed is considered to be largely positive, therefore 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 minor amendments.