

Wiltshire Council Planning Consultation Response

25th August 2026

Helen Garside
Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Verity Giles-Franklin
Officer's Title: Senior Planning Officer

Application No: PL/2025/09597 (LBC) and PL/2025/09565 (PP)
Conversion of the Existing Listed Building for 2No Two Bed Apartments and 4No 1
Bed apartments in a new 4 storey building at the rear
3 Fore Street, Trowbridge

Please find following comments in respect of the above application(s).

Recommendations:

	No comment
X	Support in principle but significant further development/information required (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.

Site and assets considered: the Grade II* listed 3 Fore Street, adjacent grade II listed buildings and the designated conservation area.

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 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 (August 2026) sets out Government planning policy for England. Chapter 20, *Conserving and enhancing the historic environment*, recognises heritage assets as an irreplaceable resource. Heritage assets should be conserved in a manner appropriate to their significance, with harm avoided unless there is a clear and convincing justification. Decision-makers are required to apply a balanced approach, giving substantial weight to the conservation of heritage assets and weighing any harm to significance against the public benefits of the proposal.

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.

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."

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

Proposal: The current proposal has been subject of a pre-application and seeks consent for the conversion of the Existing Listed Building for 2No Two Bed Apartments and 4No 1 Bed apartments in a new 4 storey building at the rear.

Issues: impact on the listed building, impact on the setting of neighbouring listed buildings, impact on the conservation area.

Information considered/provided: Policy HE5 of the NPPF requires applicants to assess the significance of any heritage assets affected by a proposal, including the contribution made by their setting, and to identify the likely effects of the development on that significance. Sufficient information should be provided to enable a clear understanding of the significance of the heritage asset and its setting, and the impact of the proposal upon it. Policy HE5 requires that the "level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance." In this case the building is listed at Grade II* and contains significant historic fabric and features.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals and the applications are accompanied by a "Built Heritage Statement" which provides sufficient information to allow understand of the significance of the building. However, the proposed scheme lacks detail and there is insufficient information to demonstrate that conclusions reached with regard to the impact of the proposals on the building's historic fabric and features are accurate.

The following heritage recommendations are therefore made on the basis of the local planning authority's own assessment of the significance of the heritage asset and the possible impact of the proposals.

Revised information: It is noted that some additional details have been included within the Heritage Statement, including with regard to significant fabric and the impact of the scheme but that there are no amendments to the architects submission, including to the plans or in respect of additional information. it is not usually the role of a Heritage Statement to provide detail for the construction of the scheme and there is also a lack of consistency between this and the architects drawings which reduces confidence in its findings (for example, the Heritage Statement notes the loss of the first floor chimney breast and seems to imply that the ground floor structure has already been removed – however, the structure is present at ground and first floor and amendments mean that it is now to be retained).

It remains the case the survey of the existing building is at small scale and lacks detail and accuracy and there has been no thorough investigation of the historic fabric or the extent of its survival – (for example of floorboards and lathe and plaster within the first-floor structure). Features identified within the Heritage Statement (e.g. plasterwork and reeded door surround) are not indicated on the plans. As a result, it is not clear that the development of the proposed scheme has been informed by either a detailed survey or the findings of the heritage assessment.

Significance of assets and contribution of setting: buildings are listed, under the Planning (Listed Building and Conservation Areas) Act 1990, for their architectural or historic interest. The NPPF defines this 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.

In this case, the building is a very significant former town house listed at Grade II*. It is located within an area which includes a number of very high-status houses built during the C18 for the wealthy mill owners of the town.

The list description reads as follows:

*FORE STREET 1. 5411 Nos 2 and 3 (formerly listed as No 2 No 3 (Barclay's Bank)) ST 8558 4/82
29.12.50. II* GV*

2. Older house, refronted circa 1700. 2 storey and attic. Ashlar stone. Projecting plinth. String at 1st floor level. Narrow moulded cornice and parapet with moulded coping. Formerly 4 now 3 tall carved vases on parapet (right hand missing). Stone tile roof. 3 pedimented dormers, the central segmental, with heavily moulded heads. each with 2 light casements, and decorative leadwork to front verges. 7 glazing bar sash windows with bracketted cills and stone architrave surrounds on 1st floor. 8-panel central door on ground floor in stone doorcase of engaged Doric columns and entablature with block triglyph and rounded frieze, moulded cornice and segmental modillioned pediment. Barclay's Bank has modern windows to left hand of door and yard entry in left hand corner. The ground floor of No 2 altered and 'restored' with central replica Doric doorcase with segmental pediment, 6 panel door and steps protected by railings. Doorway flanked by glazing bar sashes with bracketted cills and moulded architraves. No 3 retains railing to an exiguous area and has been lately embellished by a projecting cast iron bank sign and ornate cast iron panelled standards with a lamp overthrow. In the east gable wall are traces of timber framing (now exposed) and in the roof and fine array of wind braces.

Nos 1 to 9 (consec) form a group.

The Built Heritage Statement provides some additional information and it is assumed that the building was originally constructed in the late medieval or early post medieval period as a single residence with a ground floor and high status first floor hall open to its high-quality roof structure. It is assumed that the first floor would have been ceiled to provide additional accommodation at attic floor at some later date. Evidence remains at ground and first floor for a large internal stack to the rear wall (now truncated above first floor) – it is unclear if this was the original means of heating or a later insertion and this is not discussed in the statement.

There is a basement beneath the building which is shown on the survey plans but not on the proposed drawings or sections.

Assessment:

Principle of change of use

In this case it appears that a return to residential use may be to the asset's original use. Whilst the original use would have been as a single high-status residence, the pre-application and application site visits undertaken, in combination with the heritage statement, provide further information which suggests that subdivision of the main building to create 2 units should be achievable without causing significant harm. Furthermore, there is evidence of precedent for a building to the rear and it has been demonstrated that the works to achieve access to the building via a front entrance to a side passage also has precedent and will not involve the loss of significant historic fabric at the frontage.

As a result, there is no objection from a conservation perspective to the proposed change of use in principle. However, there is a lack of detail to demonstrate that the detail of the current scheme, will

preserve the historic fabric and features of the building as required and as suggested within the impact assessment within the Built Heritage Statement.

Conversion of the historic building

The presumption of current policy and guidance is towards conservation and the details of the conversion should be designed to maintain as much of the building's remaining historic character, fabric and features as possible. Regrettably very little additional information has been added since the pre-application. The proposals remain very much in principle with only indicative drawings available, at small scale. These provide little indication of the detailed impact of the proposals.

In general, there appears to be scope for the subdivision into two units and the provision of access to the rear without causing addition further harm. However, whilst some additional information has been provided within the Built Heritage Statement., it remains the case the survey of the existing building is at small scale and lacks detail and accuracy and there has been no thorough investigation of the historic fabric or the extent of its survival – (for example of floorboards and lathe and plaster within the first-floor structure). Features identified within the Heritage Statement (eg plasterwork and reeded door surround) are not indicated on the plans or taken into account.

The proposals overall, including details for upgrading to meet building and fire regulations, are generic and do not appear to be based on a thorough or detailed survey of the existing fabric or be directly informed by the need to retain historic fabric. As a result, it is not demonstrated that the historic fabric and features of the building will be preserved as required by current legislation and policy. As advised at pre-application stage, an application should provide information in respect of how the scheme will be constructed and how the requirements of other legislation such as Building and Fire regulations are to be addressed. Whilst I noted that some final details could be conditioned (for example, joinery details or precise service runs), broad strategies for achieving the conversion which are based on a thorough understanding of the building are required to accompany the submission to allow the full impact of the scheme to be assessed and taken into account and these should be specifically developed to take account of the building construction and fabric.

General issues which will need to be addressed include the creation of acoustic and fire separation between units (particularly between the ground and first floors), means of escape provision and upgrading for thermal efficiency. Small items such as vents, heating and flues and meter and bin stores can also, cumulatively, be damaging to the character and appearance of a building and will need to be carefully resolved. Details of any more intrusive proposals for repair (for example, those which involve the replacement of finishes, fittings or structure and the introduction of new structure elements to secure the stability of the building) should also be described and will usually require consent, although a final repair schedule could be conditioned. The usual starting presumption is that historic fabric such as lathe and plaster and other historic finishes will be retained or, where beyond repair, replaced in a like for like manner.

Advice contained within the Historic England publication "Making Changes to Heritage Assets" - Historic England Advice Note 2 should be taken into account in developing the proposals. For example:

42 The historic fabric will always be an important part of the asset's significance, In normal circumstances, however, retention of as much historic fabric as possible, together with the use of appropriate materials and methods of repair, is likely to fulfil the NPPF policy to conserve heritage assets in a manner appropriate to their significance, as a fundamental part of any good alteration or conversion. It is not appropriate to sacrifice old work simply to accommodate the new.

45 The plan form of a building is frequently one of its most important characteristics....

50 Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.

52 Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external, can have a considerable, and often cumulative, impact on the significance of a building.....

Examples where there is a lack of clarity include (but are not limited to) –

C18 moulded plasterwork at ground floor is identified as being of primary significance – but the proposed floor upgrades proposes removal of the existing ceilings (at least some areas of which are lathe and plaster) and replacement in plasterboard which will also result in the partial loss of the plaster mouldings. The ground floor layout and subdivision itself has not been designed with any thought for the existing historic features or layout and will also preclude the retention of some of the decorative plasterwork. Similarly, the reeded door surround which is noted in the heritage statement does not appear to be retained in the proposed layout.

It is unclear at exactly what level the first-floor ceiling will be installed and whether existing features such as the chamfers and stops will be open to view. It is also unclear that the structure will be sufficiently robust to allow light bearing for the future maintenance of features such as the dormer structures.

It is unclear how the plumbing and drainage for the central first floor bathroom will be achieved given that the first floor structure appears relatively shallow to accommodate services.

There remain limited and only small-scale details of the proposed windows and door to the high-status front elevation and it is unclear how these will be constructed and what materials are proposed.

It is unclear what works are required to facilitate the lowering of the false floor over the basement vaults which are identified as being formed in concrete but not pictured or included on the sections.

There is no detail for the proposed design of the roof over the rear bay (which also needs to make adequate provision for rainwater disposal from the main roof) and it is therefore not demonstrated that the appearance of the structure will be appropriate.

The proposed rear elevation also simply repeats the current design of the first floor entrance door (and indicates no design at all at ground floor) – but as this is a modern door of inappropriate detailing its replacement should indicate a more appropriate type.

Rear block

The heritage statement provides evidence of the historic presence of a significant block to the rear, accessed via the side passageway entrance. Details of this historic structure remain unclear but there is obviously some precedent for the proposed four storeys in the neighbouring buildings and there is therefore no objection in principle, from a heritage perspective, to the new structure.

However, whilst the materials for the rear building have been revised and the proposed brickwork is more appropriate to the context, the design has not been amended and previous comments remain relevant – “The design appears unresolved and details such as the complex rear elevation fenestration and glazing (with its large windows with multiple very small panes) appear both impractical in a modern development which must meet current regulations, and fail to reflect in any way the architectural precedents within the area.”

The design should be reconsidered, based on thorough assessment of the surroundings and taking account of the requirements of CP57 to reinforce local distinctiveness. Details should include better information in respect of the form, materiality, architectural detailing and relationship of the new building to the neighbouring structures.

Summary & conclusion: The NPPF confirms that when considering the potential impact of a development proposal on the significance of a designated heritage asset, substantial 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 will be a matter of considerable importance and weight which requires clear and convincing justification (HE:4 and 6).

In this case, the principle of the development has the potential to preserve the historic fabric and character of the building and the surrounding area, and to deliver heritage benefits through the proposed investment in repair, upgrading and structural works, which could help secure the building's long-term future.

However, the proposed subdivision and layout, together with the details of the repairs and upgrading works required to meet building and fire safety regulations, are insufficiently detailed and are poorly related to the existing fabric of the building. The proposals therefore conflict with Policy HE:5 of the NPPF because insufficient information has been provided to enable a clear understanding of the significance of the heritage asset, the impact of the proposals upon that significance, or whether harm has been avoided or minimised (required under HE:4 and by CP58).

Furthermore, the design of the proposed rear building remains unresolved and does not adequately respond to the architectural character of its surroundings. The proposal therefore fails to demonstrate compliance with Core Policy 57.

As a result, the Council cannot be satisfied that the proposals would preserve the special architectural and historic interest of the listed building, its setting, or the character and appearance of the conservation area, and therefore cannot be satisfied that its statutory duties under Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 would be met.

In the absence of further investigation, assessment and supporting information, I am unable to support the applications.