APPLICATION FOR LISTED BUILDING CONSENT
OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/04806
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	21 London Road, Marlborough, SN8 1PH
DEVELOPMENT DESCRIPTION:	Replace existing painted wooden front door with new painted wooden front door
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

No.21 London Road, Marlborough is a grade II listed building dating from the 18th century. It is one of a row of cottages, each being two-storeys, with a simple façade arrangement of a front door and one window to each floor level. The whole row has seen varied changes over the years, most prior to being added to the statutory list in 1974.

The row of cottages are within the Marlborough Conservation Area.

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

> *C18. 2 storey. Colourwashed brick. Old tile roof. Terrace of small cottages each with one window and one door. The right hand half of terrace has original windows, 4 panes wide. The left hand half has mostly C19 sashes. Nos 9 to 12 (consec) The Five Alls public house, stables and coach house and Nos 14 to 23 (consec) form group.*

PROPOSAL

Replacement front door and boiler flue.

RELEVANT PLANNING HISTORY

Proposal / Summary
E/2012/0870/FUL - Full planning permission Decision - Approve with Conditions Date: 12/9/2012 – Proposed improvements including replacement front door and new boundary wall. Single storey rear extension. Replacement garden shed.
E/2012/0871/LBC - Listed building consent Decision - Approve with Conditions Date: 12/9/2012 – Proposed improvements including replacement front door and new boundary wall. Single storey rear extension.

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) August 2026 sets out government policy, including in respect of the historic environment.

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's *Conservation Principles, Policies and Guidance* (2008) provides policy and guidance for the "sustainable management of the historic environment". Additional guidance on the application of policies set out in the NPPF is 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* (2017)
- Historic England *Advice Note 2 – Making changes to Heritage Assets* (2025)

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 57 '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.
- 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.
- Impact on the character and appearance of the Marlborough Conservation Area.

CONSULTATION RESPONSES

Marlborough 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.

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:

- None 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 20: *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:

<u>Information considered/submitted</u>

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.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals. In this case the application includes the following:

- Heritage Statement
- Design & Access Statement

Both of the above documents are rather basic in nature and content, however they are considered proportionate in detail considering the existing situation and proposals.

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 impact of the proposals.

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.

In this case the significance of the building lies largely with its external cottage character and proportions, along with vernacular materials – brick elevations, most likely fronting timber framing. Its overall character is integral to its part of a row of historic cottages, all with brick elevations under clay tiled roofs and paired sash windows.

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 policies HE4-9 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The application is the replacement of the front door.

The existing front door is a modern timber door, which is of no significance – the door was approved for replacement in 2012, and the consent was implemented. This consent allowed the style of door to change from a plain timber door with a 6-panel door.

2009

2015 – consent implemented.

2021 – it has been painted.

The new door will be a more traditional plank door, similar to others in neighbouring cottages along the row.

None of the cottages within the historic row have retained an original or historic door, and there is no uniform style of door surviving. The list description does not even note the style of door at the time the row was added to the statutory list (21st October 1974).

The proposed door will alter the appearance of the door, which is a change to the existing situation, but the style is considered more appropriate for the era and vernacular character of the cottage. Therefore it is considered to be an improvement, and there are no concerns over the proposal.

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/A
(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.

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.

In this case the proposals will have some visual change to the front elevation, but the new door style is considered to be an improvement on the existing situation. Therefore there will not be any harm to the designated heritage asset as a row of cottages, thereby preserving its significance. The character and appearance of the conservation area will also be preserved.

The requirements of current conservation legislation, policy or guidance are considered to be met and the application is recommended for approval.

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

- Time limit
- Approved plans