

APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/02456
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	2 Pewsey Road, Marlborough, SN8 1NQ
DEVELOPMENT DESCRIPTION:	Like for like roof coverings repairs, and repointing repairs to chimney of house no. 2. Windows repairs throughout houses no.2,3 & 4 with replacement of window on house no.2 top left southern elevation. Front door replacement to no.2 and 3. Proposed resin injection stabilisation system to mitigate structural movement believed to be associated with subsidence.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The application site comprises a row of three two-storey masonry cottages, finished in flint, known as 2 Pewsey Road, which is a Grade II listed building, located within the settlement of Marlborough. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The site lies within Marlborough Conservation Area, and within the setting of Marlborough College Grade II listed Park & Garden, and a high number of listed buildings, both within the College complex and the High Street.

The building exhibits flint elevations, with red brick window surrounds to the walls under a slate roof with timber sash windows with a canopy porch and retains features of special interest that contribute to its heritage significance. No.2 forms the end of the terrace to the left-hand side.

The curtilage includes historic boundary walls that have been repaired over their lifetime and these are considered part of the listed building under Section 1(5) of the 1990 Act.

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

PEWSEY ROAD 1. 5407 (East Side) Nos 2 to 4 (consec) SU 1868 2/289 II 2. Early C19. Nodular flint. Red brick dressings. Hipped slate roof with overhanging eaves. Brick stacks. 2 storeys. 6 ranges of cased sashes with glazing bars. 3 modern doors, nos 3 and 4's in porches. Lozenge-shaped trompe l'oeil clock painted onto 1st floor wall between nos 3 and 4.

PROPOSAL

The proposed works are to undertake general maintenance of the cottage (outside the scope of this application) but as part of the works, it is proposed to replace one front elevation sash window to the first floor as this has become beyond repair, and undertaken structural repair works,

including stitching and ground stabilisation to the front elevation due to the limited foundations which has resulted in movement.

RELEVANT PLANNING HISTORY

Proposal / Summary
K/17232 - Full planning permission Decision - Approve with Conditions Date: 8/4/1991 – REPLACEMENT OF FLAT ROOF WITH PITCHED SLATE ROOF, REPLACEMENT PORCH AND ALTERATIONS
K/17245/L - Listed building consent Decision - Approve with Conditions Date: 8/4/1991 – REPLACEMENT OF FLAT ROOF WITH PITCHED SLATE ROOF, REPLACEMENT PORCH AND ALTERATIONS
K/33181/L - Listed building consent Decision - Approve with Conditions Date: 24/9/1996 – Substantial repairs to brick and flint wall, including renewal of some brick coping and facing bricks.
15/09190/LBC - Listed building consent Decision - Approve with Conditions Date: 10/11/2015 – External alterations/refurbishments to windows roof, handrails, rear boundary wall. Internal alterations/refurbishments to kitchen, larder, utility, and bathroom.
PL/2025/02665 - Listed building consent (Alt/Ext) Decision - Withdrawn by Applicant Date: 22/5/2025 – Underpinning to the south elevation of 2, 3, and 4 Pewsey Road. Window replacement and repairs to windows, roof and Chimney
E/09/0984/TCA - Work to Trees in a Cons Area Decision - Approve with Conditions Date: 11/9/2009 – Fell 3 x Leyland/Lawsons Cyprus to ground level.

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.

Chapter 5 of the NPPF sets out policies for *Meeting the challenge of climate change* and gives substantial weight to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

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)
- Historic England *Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency* (2026)
- *Traditional Windows: their care, repair and upgrading* (2017)

Historic England's publication '*Traditional Windows – Their Care, Repair and Upgrading* (2017)' encourages the retention of windows that contribute to the significance of listed buildings but sets also out their approach to the alteration/replacement of windows where this is acceptable in principle:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, they should therefore be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without harming the significance of the listed building. There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.
4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.
5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be

considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

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.

CONSULTATION RESPONSES

Marlborough Town Council raised no objections.
No other responses were received.

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.

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:

Information considered/submitted

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 was submitted with a Design Access and Heritage Statement and a Structural Engineers report. This provided sufficient understanding of the significance of the property, and the impact of the proposed works.

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 the vernacular finish of the group of three cottages, together with the trompe l'oeuil clock painted onto the first floor between 3 & 4. The group setting, tucked off the main road, adds to their more rural appearance for a town location, though this has been slightly eroded due to the development around them.

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.

Historically, the properties have had limited maintenance undertaken, and the proposed works in this application form part of a bigger project to undertake maintenance and internal decoration works. However, it is sensible to resolve the structural issues prior to undertaking any further works.

Structural Repairs

The submitted Structural Engineers Report noted that the front elevation of the building had suffered from movement. Further investigations have been undertaken, including trial pits, which showed that the foundations of the dwellings were extremely limited and insufficient to support the weight of the building. The investigations into the drainage and rainwater goods, showed that there were some blockages, which have subsequently been cleared, but were generally found to be in good order, and would have not contributed to the movement of the building.

The application provided a consideration of more traditional under-pinning which is intrusive and disturbs the grounds further. There is also limited access to the properties, with limited space around, and therefore an alternative solution of resin injection to stabilise the ground has been submitted. This method has been used elsewhere of the estate, and it is a recognised solution to stabilise the ground. This method would require some internal access panels in the floor to be formed, but the overall impact on the buildings and their settings is considered to be less intrusive, whilst offering a long-term solution. The proposed solution is therefore considered to be acceptable.

Following the stabilisation of the ground, the existing cracking will be raked out and where required a Helifix stitching bar will be used to tie the elements back together. Any pointing works will be undertaken in a lime mortar to match the existing. This is a recognised conservation repair method and is supported to provide the long-term protection of the building.

Replacement sash window

The existing windows have been subject to limited long-term maintenance and therefore have suffered from some localised rotting. The proposed maintenance works (outside the requirement of an LBC) include over-hauling, repairing and decorating the windows. On inspection, one sash window, to the top left-hand side, is beyond repair, and it is proposed to replace this window. The submitted information shows that these will match the existing details, including external putty. The replacement of one window is considered to be acceptable.

Replacement of modern entrance doors

The existing doors have been replaced in the late C20 with standard, modern doors. The proposed works looks to remove these doors and install 6-panel glazed timber doors in a style more appropriate to the vernacular design of the cottages. As the doors are modern replacements, there is no historic or significant ironmongery, and therefore a complete replacement is acceptable.

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?	NA
(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?	

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 impact of the proposals on heritage assets will be largely positive as it will stabilise the building, allowing it to be used as a dwelling. The maintenance works (not included within the application) and the replacement of the sash window and doors are considered to bring the building back into active use.

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:

- *Timeframe – WA5*
- *Drawings & reports*