

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/03377
Erection of advertisements - 4 x fascia signboards and 10 x poster boards (retrospective)
The Cross Keys, High Street, Rowde, Devizes, SN10 2PN

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. Section 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.

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's Conservation Principles, Policies and Guidance (2008) provides policy and guidance for the "sustainable management of the historic environment". Additional relevant guidance on the application of policies set out in the NPPF is contained within their publications[Officer to edit for relevance]:

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)

“The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3” (HE GPA3) which notes that “The importance [of setting] lies in what the setting contributes to the significance of the heritage asset or to the ability to appreciate that significance.”

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: The application is for retrospective consent for the erection of advertisements - 4 x fascia signboards and 10 x poster boards (retrospective)

Relevant planning history: NA

Issues: impact on the setting of neighbouring listed buildings, impact on a non-designated heritage.

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.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals and in this case the application is accompanied by a Heritage Statement. This assessment considers that the ‘four fascia signs are proportionate to the commercial frontage and occupy locations where business identification signage would reasonably be expected as part of the continued use of the premises’ and that the ‘twelve promotional display panels are positioned at ground-floor level and cover the existing windows associated with the retail frontage’. The extent of the advertising is considered to be justified as ‘whilst these panels introduce additional visual activity and represent a more intensive form of advertising than might traditionally have been associated with a historic building, they are directly related to the active commercial use of the premises.’ As the panels are removable, they are therefore considered to cause no harm to the building and does not cause harm to read the buildings appearance. No discussion has been undertaken on the impact to the street scene or the setting of the listed buildings. The conclusion states:

The effect upon the significance of the non-designated heritage asset is considered to be limited and localised. The minor level of harm arising from the advertisements is outweighed by the public benefit of supporting the continued viable commercial use, occupation, and maintenance of this prominent village building.

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.

In this case, the significance of The Cross Keys lies largely within its design, form, and former function. Its architectural expression and detailing possess significant aesthetic and architectural interest, contributing positively to the character of the area and the setting of the nearby Grade II Listed Buildings—specifically *The Jacobean House, Rowde Hall, and Linfurlong*. These listed buildings date from the 15th to the 17th

centuries (with Rowde Hall being slightly later, dating to the mid-18th century); while they have undergone historic alterations, their scale and architectural treatments respond sensitively to their age. The design of The Cross Keys deliberately draws upon these historic proportions and scaling to complement the older assets within its immediate setting.



Postcard, with postal stamp DE 23.04



Images taken from Google maps showing the setting.

The 1st Edition Ordnance Survey map shows the Cross Keys pub, but this was historic coaching inn (a simple thatched building) which was destroyed by fire and replaced in the late 1930s with the current

building. The architecture is a mock-Jacobean design, featuring an exposed timber frame and brick infill, and contributes a dominant and characterful feature within the street scene. The careful symmetry of the principal front elevation provides a deliberate architectural contrast to the longer, more functional side elevation. The formal fenestration pattern, complete with prominent mullions, contributes strongly to the architectural composition, seamlessly marrying the decorative herringbone brick panels of the first floor with the Flemish bond brickwork of the ground floor. Furthermore, the side elevation features slightly projecting bays that intentionally mimic a traditional jetty detail, complete with decorative supporting brackets. The profile and detailing of the entrance doors further respond to the overarching historic design language of the host building.



Enforcement Photographs

Since the Google images were taken (June 2025), there has been some demolition of the single storey element to the rear (approved consent for the construction of an additional dwelling).

Assessment: The property was designed and constructed as a public house, in a distinct design that would complement the street scheme. The advertising for the public house was limited and designed to a scale that would complement the building, working with the fenestration and timber frames panelling. The submitted scheme for the retrospective consent is for a change of signage.

Front elevation

To the ground floor, the windows are concealed with two large boards, and four additional advertising boards have been installed. The covering of the windows is considered to cause harm to the appearance of the building. Whilst they are reversible, windows are often considered an important feature of a property, and in this case, this is certainly true. It is likely that the windows are required to be concealed to hide any shelving that has been placed on the internal walls. The window openings could be retained, with internal boards applied to hide the shelving, and this would retain the appearance of the property, whilst offering security. The images on the boards are colourful and brash, and these could be considered in-appropriate for the property and the setting of the listed buildings in a village location, especially due to their large scale.

To support the large boards covering the windows, four smaller panels have been installed which allow for changeable posters advertising special deals and offers. These have replaced the blackboards of the public house. However, the material of the replacement display boards is generic, urban and standard, and does not respond to the care and details that can be seen within the architectural details of the host building.

To the first floor, two large signs have been installed (with external lighting) that cover across the timber framing and are considered to be of a scale that competes with the architectural detailing of the building. Again, these signs are of bright colours (corporate colour and design), rather than working with the form of the NDHA and its setting.

Side Elevation

To the ground floor, the windows have been covered with the fixed large boards. The right-hand side over sails the timber frame and is visually intrusive to the architecture of the building. The large corporate images of the goods sold enhance the urban appearance of the advertising, rather than respecting the village location.

To the first floor, the two projecting bays have had two large corporate signs and external lighting applied. As with the front elevation, these are large and cover the width of the bay and are almost full height of the timber framing. The corporate colours and the materials clash with the architectural design of the building.

The former public house had signage, and it is expected that any business would require advertising for their shop/ retail space. However, this can be undertaken with consideration for the architecture of the building and to the setting within the rural High Street which has a number of listed buildings. Whilst the street is called a High Street, this is because it is the primary street, rather than a busy retail street. The choice of materials, the scale and the colour choice can have a positive or negative impact on the NDHA.

The proposed (installed) signage is considered to be prolific and, for the most part, unsympathetic in its design and use of materials. The provision of a disproportionately large advertisement has the effect of unacceptably competing and jarring with the simplicity and regularity of the architectural detailing on the host building when seen within the street-scene. Therefore, this does not allow the NDHA to be appreciated in the same positive way as without the signage. The signage results in disproportionate, incongruous interventions in this historic context and results in harm to the significance of the NDHA and the setting of neighbouring listed buildings.

The submitted information justifies the works as they are 'reversible', however, their sustained presence completely obliterates the active frontage and architectural rhythm of the principal elevation, causing active harm for the duration of their installation.

Whilst the use of the shop allows the building to have a function, and accessible to the public, no evidence has been provided that the extent and scale of the signage is required to ensure that the shop is viable. No consideration for alternative options has been provided. A hanging sign, such as the type that the public house had, could assist with additional signage if required.

Under the NPPF there is a requirement for a balanced judgement to be undertaken to protect the significance of the NDHA. Whilst signage for the use of the former pub as a shop is accepted in principle, the installed signage is considered to cause harm that could be reduced (or removed) by more considered signage that works with the architectural detailing and scale of the host building and responds to the more rural nature of the village.

Additional Notes

There are external chiller units that are on the front elevation, and these are excluded from the application, but it is recommended that these are relocated to a subservient elevation as these are considered to cause harm to the principal elevation of this NDHA.

The simple step to the ground floor has been crudely replaced with a tarmac ramp, which is considered to cause harm to the carefully designed details of brick fronted steps. Whilst accessibility is important, this can be undertaken in a more sympathetic detailing, and work with the building to provide a correct access (such as a step and a compliant ramp), as required under the Equality Act and Doc M of the Building Regulations.

Summary & conclusion: The NPPF confirms development proposals on non-designated heritage assets should have a positive impact (HE7.1), but where a development proposal would result in harm, this should be weighed against the benefits and a balanced judgement made (HE7.2) when considering the impact of a proposed development on the significance of a heritage asset.

The proposals will result in harm to the building via the scale, form and colour of the panels and the loss of the visibility of the windows.

Whilst Policy HE7.2 allows for a balanced approach, which could include public benefits, in this case no objective justification has been provided for the works and it has not been demonstrated that the works will result in any public benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance and I therefore recommend refusal.