

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/05071 & PL/2026/04727
Replacement of roof covering with the installation of fire barriers to the building. Roof is to be recovered in Natural slate with lead valley gutters to match existing Cedar House, Byron Road, Devizes, SN10 5FA

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 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:

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)

“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.”

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 the replacement of roof covering with the installation of fire barriers to the building. Roof is to be recovered in Natural slate with lead valley gutters to match existing

Relevant planning history: K/33069 & K/33070/L – Conversion of the building.

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

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 applications are accompanied by a Design and Access Heritage Statement. This document provides sufficient information to understand significance and make an impact assessment.

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 which relates to the original intended function of the site, which have significant aesthetic and architectural interest.

Assessment: The existing roof covering is not original to the building, as evidenced by the inline ventilation within the ridge tiles. It is likely that the roof was replaced as part of the conversion works consented in 1997. The proposed works seek to replace the existing roof covering and insert inline ventilation. While inline vents are typically required by Building Regulations for a traditional cold roof (where insulation sits at ceiling level). It has been confirmed that the existing insulation is at ceiling level, and it is proposed to increase the insulation at the time of the works.

The principle of a new roof covering is considered acceptable. Although the installation of inline vents has the potential to alter the visual appearance of the roof, there is a clear technical requirement for them, and the proposed solution is considered the least harmful option.

The works also propose to install fire breaks into the roof void to form compartmentation using plasterboard and modern materials. While modern materials are not generally supported within historic buildings due to compatibility issues with traditional construction, the location of these walls will not harm the vapour permeability of the significant historic fabric. The requirement to install fire separation is highly important within mixed-occupation buildings to protect life and property; therefore, these works are supported. However, care must be taken when sealing the fire breaks. Expanding foam should not be used within any historic building, and it is recommended that this restriction be secured by condition.

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.

In this case the proposals will have a neutral impact on the heritage asset, but offers a longer term heritage benefits by virtue of the protection of the building in case of fire.

Condition

No expanding foam, spray foam insulation (whether open-cell or closed-cell), or polyurethane-based aerosol sealants shall be applied to any part of the internal or external fabric of the building, including but not limited to the roof timbers, rafters, masonry, or floor voids.

Reason: To safeguard the historic fabric, architectural integrity, and breathability of the listed building, preventing irreversible damage and timber decay from trapped moisture,