



Bourne Valley Associates Ltd

**Planning and Heritage Statement to support
planning and listed building applications for
replacement doors and windows**

at

The Old Stables, 41A Main Street, Keevil, BA14 6LX

For Mr and Mrs Gough

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Issue 1

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1. Introduction

This Statement accompanies and supports applications made to Wiltshire Council seeking planning permission and listed building consent. The proposal relates to replacement windows and doors at The Old Stables, 41A Main Street, Keevil, BA14 6LX. The property has previously been known as Clydesdale Cottage¹, and is a listed building. Works are also proposed for an unlisted annex within the curtilage of that listed building. This request is submitted by Bourne Valley Associates, acting as agent on behalf of Mr and Mrs Gough, who are the freeholder of the site.

The proposals have been the subject of pre-application advice from officers at the council. The detail of that consultation is set out in this statement. However, in summary, the officer's advice was that the proposed works to the listed house would require listed building consent, but not need planning permission. Those works to the annex, however, would be subject to planning permission only. The proposals, however, are submitted simultaneously though separate procedures will be followed by the planning authority.

A heritage statement will be required because the house is a listed building, and is also set within a conservation area. In this case, the details of the heritage assets and an assessment of the impacts on them are set out within a planning statement that covers a wider range of issues. In respect of the works to the annex, the impact on the setting of the listed building is also addressed.

A significant factor in the consideration of these proposals is the fact that permissions for works at the site have previously been granted, but not fully implemented. Therefore, we set out the planning history of the site and consider its implications.

The statement seeks to follow requirements set out in the National Planning Policy Framework (NPPF) and also guidance on proposals affecting heritage assets by Historic England and others. In addition, in terms of design, the proposals have been guided by the advice of the council's conservation officer, to whom we are most grateful. The guidance was subsequent to the provision of pre-application advice, reference ENQ/2025/00892.

2. Site Context

The application site is set within the centre of Keevil, a village some 5km to the East of Trowbridge, and about 1.5km south of the A361, the main Trowbridge to Devizes road. The indicative position is shown by the golden arrow in Figure 1, but the location plan is formally submitted with this application, as Drawing 05350-00, Sheet 01. As can be seen from Figure 1, Keevil is a linear village, with development alongside a road. In planning terms, the Wiltshire Core Strategy defines Keevil as a "small village". Small Villages are considered to have "*a low level of services and facilities, and few employment opportunities*", and do not have a settlement boundary. Some "modest" development is possible in small villages, but we consider that the principal of development would not be open to debate through the proposed works.

¹ The name was changed by the present owners in 2013. The revised name is more relevant as the property was an old stables and has never been a cottage.



Much of the village was designated as a conservation area in 1973 to “*preserve and enhance the special architectural and historic interest*”. Figure 2 is a map of the village with the conservation area shown shaded. The map is taken from the former village design statement. It should be noted that the interpretation is a little difficult because North is not, as is conventional, at the top of the map, and one should turn the map 90° anti-clockwise. The red arrow shows the location of The Old Stables, in a central position within the conservation area.

The character and significance of the conservation area is set out in Section 7.

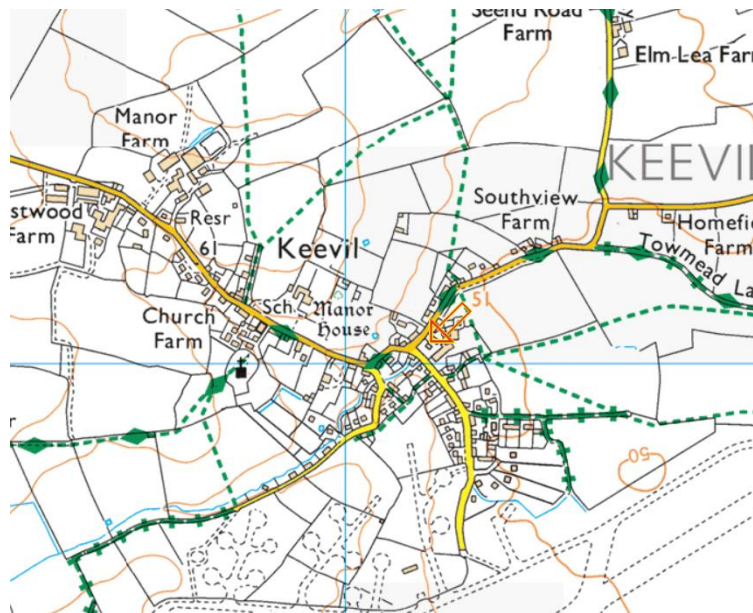


Figure 1 - Site Location

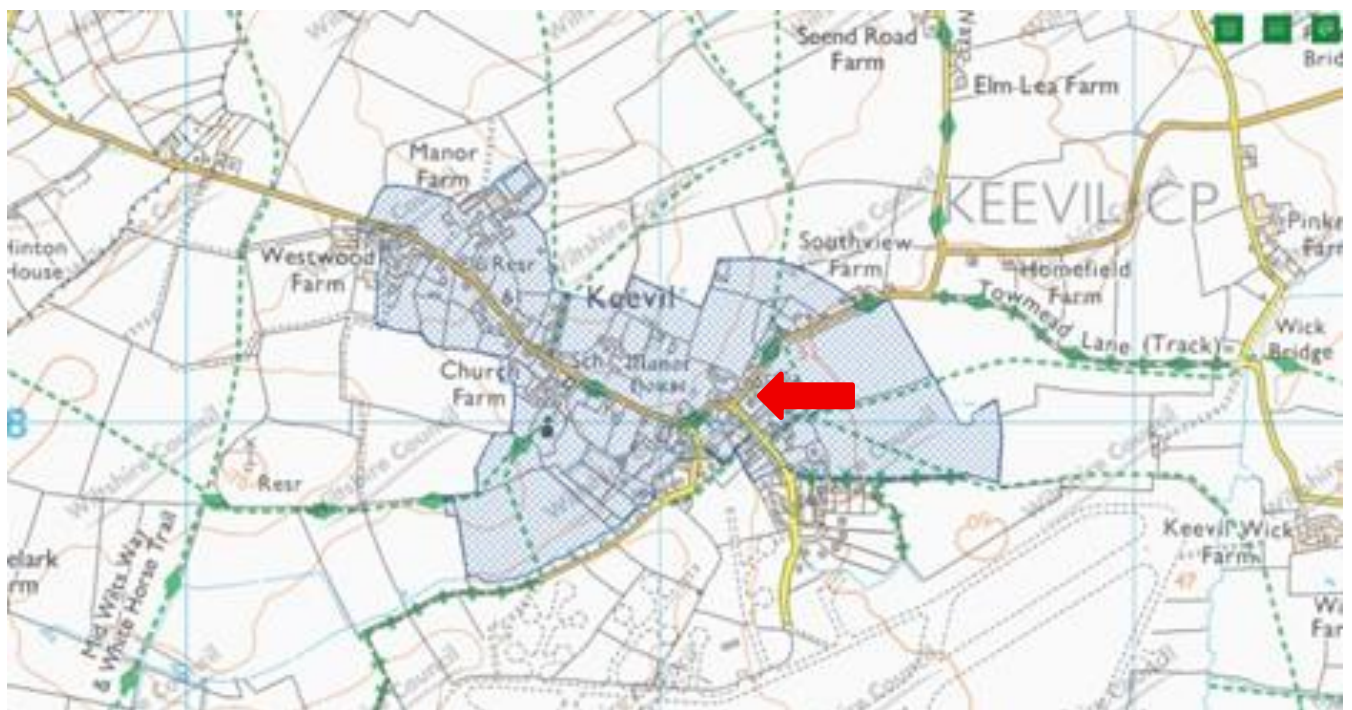


Figure 2 - Map showing Keevil conservation area



An aerial photograph is a good means of understanding the general form and grain of a settlement in which a development site sits. Figure 3 is such a photograph, taken in June 2025, and thus very representative of the current situation. The two buildings which are the subject of this proposal are shown by the red arrows.

As can be seen in the block plan, the main house is that to the South-West, facing Martins Road, and is in a prominent position. The annex is set within the site and is much less visible from public view.

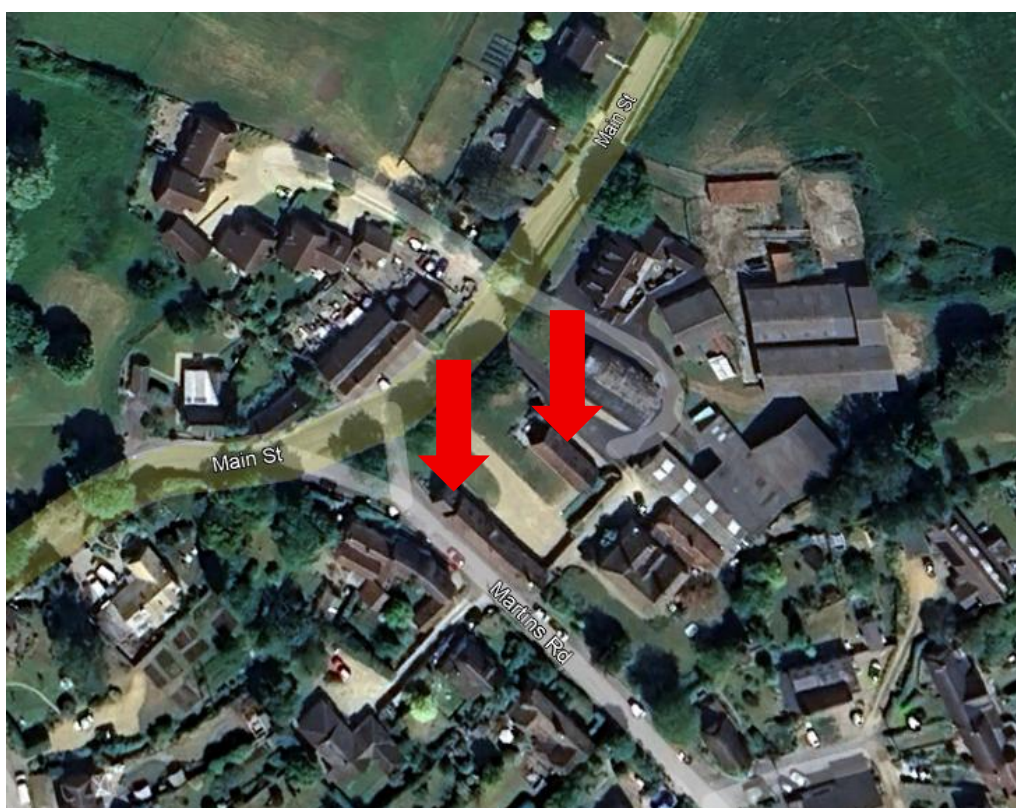


Figure 3 - Aerial photograph, 2025

The village was established on farming, and the juxtaposition of farm buildings with dwellings is still evident. The application site was within the home complex of Longleaze Farm, as will be described in Section 3. The terrace to the North-West of the site, on the far side of Main Street, was once the local public house and the name is retained as Rose and Crown Cottages.

The entrance to the application site is opposite the former pub, and the principal public view of the properties can be gained there. It is captured in Figure 4. The rustic nature of the buildings is still apparent. However, little detail of the windows can be gained from this distance.



Figure 4 - View of site from Main Street

3. History

The Old Stables is a Grade II listed dwelling, the result of a conversion from a former coach house, stables and coachman's accommodation. The vernacular style of the original building may not be of the merit of some of the surrounding much earlier buildings that make up much of the village of Keevil, but as an example typical of a nineteenth century farm, it forms a vital part of the history of the village. It sits alongside the adjacent farmhouse, which it once served, forming an important focal point in the centre of the village.

The garden is an area clearly defined by its surrounding walls and buildings. Its layout is simple and defined as much by the access drive and parking/turning area as by its buildings. Simple lawns are in the remaining areas with some planted borders, a summer house, patio and mature trees.

The property dates from the mid 19th century. If one looks at the 1st edition Ordnance Survey map from 1885, as shown in Figure 5, the courtyard nature of buildings at Longlease Farm is clear. The western building, abutting Martins Road, was certainly present in very much its present form. The garage block was not then constructed. There was a further barn facing Main Street, but that is no longer present, as is evident in Figures 3, 4, and 6.

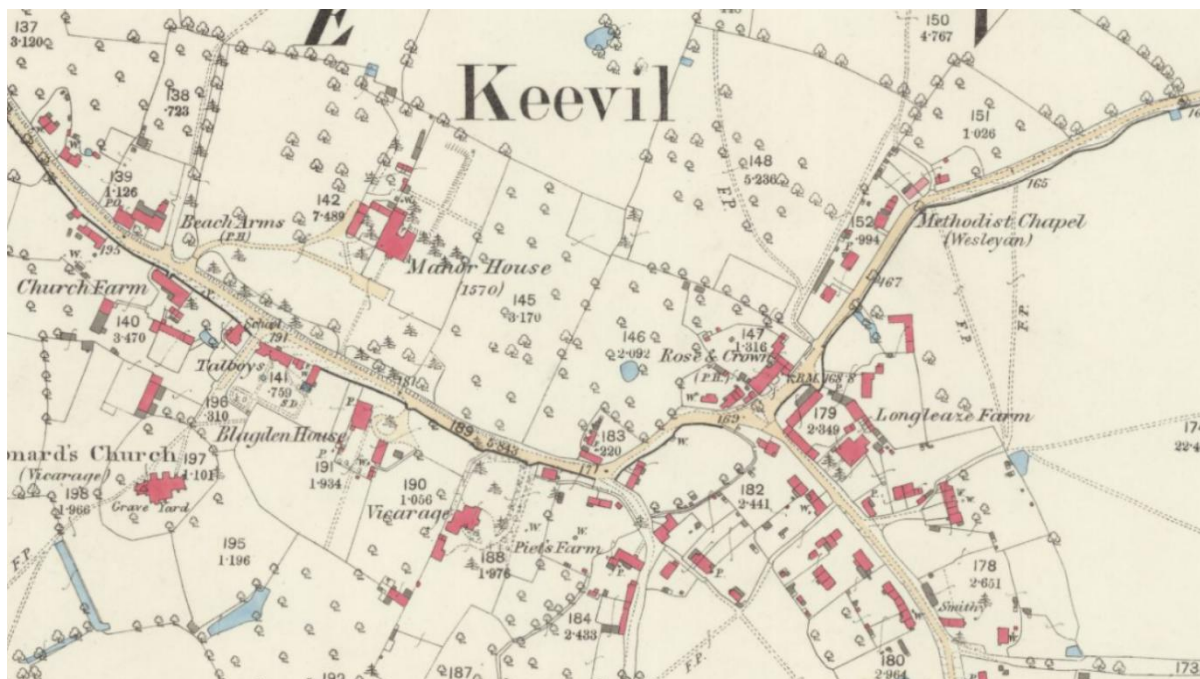


Figure 5 - OS 1st edition 25" to the mile, 1885

We have also examined the OS maps of the same scale from 1899 and 1922, but there are no significant differences in form and layout. That also seems to be the case in the 1938 1:25,000 map, but it is far less accurate.

When the building was listed in 1968, it was still in use as an agricultural building. Since then, it has been turned into a domestic dwelling, whilst retaining many of the original features.

In historical terms, it is also important to recognise that, despite extensive research by the applicants, they have not been able to confirm that there were, indeed, any glazing in any of the windows prior to the 1980s. Local evidence suggests, that prior to residential conversion in the late 1980's, the coach house entrances were open, and the window apertures were filled with chicken wire, as the barn formerly housed chickens.

Figure 7 shows the impact of the hurricane of 1987. It led to the collapse of the barn facing Main Street. This was prior to the current owners purchasing the site in 2010. Listing of buildings at the site took place in 1968 (see Section 7), so before that event. So, although the barn was listed then², and documents imply that the barn is still in existence, that is certainly not the case³.

² It has the Historic England reference of 1251920, and entitled Barn at Longleaze Farm.

³ Wiltshire Council's conservation officer is aware of this, and has advised that the listing of that barn should be deleted.



Figure 6 – This shows the stables in early 1986. The second barn which faced main street can be clearly seen on the right of the image.



Figure 7 - This shows the collapse of the listed barn facing Main Street, which occurred in the storm of October 1987. The Old Stables is in the background.



Figure 8 – This is the earliest picture of the stables held at the Wiltshire and Swindon History Centre. It was taken in 1986, prior to residential conversion. The windows had been recently installed by the previous owner, and replaced chicken wire



Figure 9 – This picture shows the location of the garage block, that was added in 1989.



4. Planning History

The details of planning history have been taken from the Wiltshire planning application web page. The full list includes works to trees, as consent is necessary, given that the site is within a conservation area. However, we do not consider that such details are material here, and we have not included them in this statement. The list below is believed to be comprehensive⁴.

W/82/00141/HIS – Change of use from stable to store. Approved, with conditions (13/04/1982). No drawing available.

W/87/01204/FUL – Conversion to residential dwelling. Withdrawn.

W/88/00405/FUL - Change of use of redundant stables to residential use. Approved, with conditions, (19/07/1988) but the information available does not set out the conditions. Again, no drawings are available. This application was submitted after the listed barn fell down in 1987.

W/88/00406/LB The concurrent listed building application to the above planning application.

The two concurrent applications were granted permission and consent, but with no significant conditions, other than the details of the external materials should be submitted and approved.

So, it is reasonable to assume that the buildings were converted into their present use in the 1980s, in accordance with the 1988 proposals. It is important to note that the existing windows were installed at the time of the conversion to residential use. They are of a timber (softwood) construction with single glazing and the doors are single skinned, some of which contain single glazed windows. Large glazed doors have been fitted to the original coach house entrances, which are single glazed with glazing bars. These details have remained as they were constructed in the 1980s, despite planning permissions and listed building consents since granted, which we set out below.

In Section 6 the proposed works are described, and clear reference to the existing windows and doors, in conjunction with references to plans showing their detail.

The first “visible” application is W/06/01982/FUL, which gained planning permission in 2006 for a Victorian summer house. It is assumed it is not relevant to the current proposal.

The most material applications, submitted by the current owners, are the listed building consent application W/10/03401/LBC, and the planning permission W/10/03402/FUL. These ran and were determined concurrently, and gained permission in December 2010. They allowed the conversion of the former stables, which included a change of the doors and windows. Condition 5 of the respective permissions is shown below and was fully discharged:

⁴ Not all 20th century planning applications were initially available, but have now been provided, as the result of a pre-application advice request. Even so, early applications do not have visible details – simply the description and decision.



- 5 No works shall commence on site until details of the timber frames and double glazing have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include depth of reveal, details of heads, sills and lintels, elevations at a scale of not less than 1:10. The works shall be carried out in accordance with the approved details.

REASON: In the interests of preserving the character and appearance of the listed building and its setting.

West Wiltshire District Plan 1st Alteration 2004 - POLICY: C28
Planning Policy Statement 5: Planning for the Historic Environment

The approval allowed the windows and doors to be replaced by timber 24mm double glazed units with single panes i.e. no glazing bars in accordance with the plans. At present, no windows and doors in the main house have been replaced, with the exception of the roof lights. It was prudent and foresighted of the officers to comment, in respect of double-glazing:

“Whilst it is acknowledged that double glazing would be nontraditional and distinguishable from single glazing from the ground floor, the harm is considered to be balanced against the need for improved thermal efficiency of the building.”

It should be noted that, prior to the 1980s, there were no windows in the roof of either structure. Four roof lights were introduced to the main house in the late 1980's, which were increased to eight in 2010 in accordance with the permissions. At this time, all roof lights were also changed to Conservation Velux in black, with one central glazing bar. Three Conservation Velux were also introduced to the garage block in 2015 in accordance with the permissions. They can be seen in Figure 10, which shows the former garage structure.

The rooflight units in the main house and garage block are already double-glazed, and the current proposal does NOT seek to change them.



Figure 10 - Existing rooflights in garage

If one looks at the existing 1980's (i.e. before the 2010 applications) typical window, it has this form:



Each window is divided into 6, by one horizontal and two vertical glazing bars.

If one looks at the “proposed” windows from 2010, each one typically has this form:



The window would have two glazed areas, divided by a single vertical glazing bar. This application seeks to revert to the original style of window, whereby each window would retain smaller panes rather than two.



We contend that, as the conversion and modification works approved by the two 2010 consents were implemented, other than in respect of the windows, the permissions did not lapse. Thus, if the applicants were so minded, they could introduce the double-glazed window types approved in 2010. At present, as previously stated, no windows (other than the roof lights) and doors in the main house have been replaced. As custodians of the building, the applicants believe such a change would alter the look of the building too greatly, both in material and in design. As discussed in the section on proposed design, we consider that the current proposals would enhance the heritage interpretation of the property in a way far greater than if the 2010 permissions had been implemented.

In 2014, 14/10777/FUL sought the *“Conversion of existing garage block to a residential annex involving the insertion of a new gable window, rooflights and internal works to the existing attic to provide two new bedrooms and a bathroom above the existing garden room and garage.”* On advice from the planning authority, only planning permission, and not listed building consent, was sought because the former garage block is not listed. Permission was granted in January 2015. The officer’s report states that construction of the garage was granted in 1989 and that a further application in 2010 converted 50% of the ground floor to provide a garden room. The 2015 permission allowed two bedrooms to be provided in the attic and for it to be used as an Annex to the main house, with a condition that it cannot be used as a separate property.

The use of the attic needed new windows: one in the end facing the garden, and three rooflights in the East elevation.

It is considered that the external alterations proposed are minor and would be sympathetic to the host property and would not have an adverse impact on the character and appearance of the conservation area or the neighbouring listed building.

That conclusion is significant in as much as further glazing works proposed for the former garage, within the setting of a listed building. Once again, we consider that the works would improve the heritage value of the building.

Two permissions granted in 2024 were for *“Retrospective Listed Building Consent for the Royal Air Force Keevil Memorial plaque and the 1983 Queen Elizabeth II Silver Jubilee plaque installed in the boundary wall”* under reference PL/2024/10106, and *“Installation of a new stone plaque to commemorate the King Charles III Coronation on outside of boundary wall,”* under reference PL/2024/10131. Both of these application were for listed building consent, which was granted because it was considered the impact on the significance of the heritage asset would be neutral.

The applications have no great significance to the current proposals, other than to demonstrate that visible changes can be considered to have a “neutral” impact, rather than “less than substantial”. Moreover, the officer’s report did contain a useful description of the listed building in its context:



Assessment: The Old Stables is a Grade II listed dwelling, the result of a conversion from a former coach house and coachman's accommodation. The stone vernacular outbuilding is an example typical of a nineteenth century farm, it forms a vital part of the history of the village. It sits alongside the adjacent farmhouse, which it once served, forming an important focal point in the centre of the village.

The garden of the former coach house is defined by its surrounding walls and buildings. Its layout is simple and defined as much by the access drive and parking/turning area as by its buildings. Simple lawns are in the remaining areas with some planted borders, a summer house, patios and mature trees.

The planning history shows that the application site is dynamic, and that a series of changes have been made over the years, working in conjunction with the planning authority. The proposals, where implemented, have been achieved whilst retaining the character and allowing the continued interpretation of the heritage asset. Moreover, as we make clear, much of the proposed works to both doors and windows, although approved, have not been fully implemented.

What then, are the implications of the previous permission for the site? In her concluding remarks on giving pre-application advice, officer Pippa Card wrote:

"the existing are not untypical of windows in this type of building. They have permission to be replaced, so the principle of this has been established.

I do agree that retaining the existing style of window is more appropriate for the building than those approved in 2010. The use of metal framed units, which contain 18mm double glazing is also considered an acceptable alteration, as the style retains the character, and the metal units will be a fine detail that preserves the stable character of the listed building."

So, the principle of our clients' proposals appears to be more acceptable than the previously approved designs. Moreover, we are pleased that slimline double-glazed units are acceptable.

Although the officer expressed initial concerns over the means of the functioning of the windows, detailed discussions and consideration of practical issues associated with the structure of the window openings, have led to the provision of detailed drawings. It is hoped that these designs are considered to be a pragmatic and appropriate approach to upgrading the windows and doors.

5. The Need for the Works

As stated above, none of the window casements and frames are original, and therefore have no historic value. They mostly date from the 1980s, and are constructed of softwood and have dried, cracked and are typically in a poor state of repair. The windows let external air in and are therefore hugely inefficient. The applicant has sealed the windows to prevent drafts, however, that solution is clearly unsatisfactory in the long term, as it is normal to want to open windows when good ventilation is required. Therefore, in addition to seeking windows of a style, design and material appropriate to the listed building (and similarly, the annex), windows are needed that can readily open in the current window spaces, have longevity and easy maintenance. It is also vital they are thermally efficient and meet current security standards.



The windows were still fixed shut at the time of the visit of the conservation officer. However, the applicant subsequently opened one, and its position and means of operation is shown in Figure 11.



Figure 11 – Existing window, external view

The dry state of both the frame and the casement are apparent, and the unsightly vent is visible. It is clear that the window is centre hung, and that the window is set well back in its opening.

The detail of the existing windows is set out in Drawing 05359-0A, Sheet 03, dated 22nd October 2025. The elevation drawing shows the stone arch, coining and cill typical of all the windows. They will remain under the proposals. The plan view is helpful because it shows the positioning of the window within its opening. The section confirms the windows pivot around a central position, with the lower part opening out.

In addition to the poor condition of the windows, they are single-glazed and are constructed in such a way that daylight is visible between the opening section of window and the frame. Given the increasing cost of fuel, and the poor heat-retentive capability of this design and single-glazing, it is entirely reasonable for householders to seek replacement by double-glazed units. When an application is made, we will introduce text explaining the thermal, and thus sustainable development



advantages of double-glazing. However, as has been explained above, the existing consents have already accepted the principle of double-glazing.

As stated previously, the applicants could implement the glazing and doors approved under the 2010 permissions, and to retain windows implemented under the 2015 permission for the converted garage. Instead, they want to achieve window and door designs that are appropriate to the listed building, to its setting and to the character of the conservation area. They consider the proposals would not only achieve those objectives, but they would also enhance the buildings.

6. Proposed Works

6.1. Introduction

It is proposed that an integrated approach to windows and doors is achieved by the installation of steel products from Fabco Sanctuary. General details about the company and its products can be found at <https://fabcosanctuary.com/product/black-steel-windows/>

Fabco is experienced in producing double-glazed steel windows in a thin 18mm glazed form known as W20. This profile of glazing is appropriate for conservation projects where the glazing should look like the thin form of single-glazing, especially where there has been single-glazing. As is the case here: the existing windows are single glazed, but the proposed appearance would be more appropriate to the setting. It is also worth noting that the 2010 listed building consent approved the use of double glazing in the property. The company's web page sets out its experience in dealing with heritage assets:

"Our family-run company has grown from a background of specialist restoration and preservation of windows and metalwork on many of the finest ecclesiastical and historic buildings.

Recognised as the UK's leading specialist in this field, Canterbury Cathedral, Windsor Castle, Tower of London, V&A Museum, and Harrods were just some of the 3000 projects we were involved with."

We point out in Section 7.2 that there are many buildings with steel windows within Keevil. Yet, in public perception, with the exception of industrial buildings of the early 20th century, steel is not publicly perceived as being the material associated with historic properties. Therefore, it is worth summarising the advantages of using steel:

Superior strength and security

Steel is the strongest window material available on the market, with a strength around three times greater than aluminium. This superior strength means that the frames are very hard to break and thus secure. The right steel frames will also last a lifetime, unlike timber.

Appearance and light

The strength of steel allows the frames to be slimmer in form (marketing material describes them as "elegant") so that it is easier to replicate the perception of single-glazing without wide supports in form of frames and glazing bars, so that more natural light can enter the building.



The manufacturing process allows greater flexibility of design, so that the appearance of the windows can more readily replicate originals, if necessary.

Low maintenance

Steel frames are incredibly durable, which also makes them very low maintenance and easy to clean. Steel windows are often coated (as proposed here) with a corrosion resistant top layer, which means they can withstand harsh weather conditions without rusting and will stay looking fresh.

Increased thermal insulation

Steel windows are very energy efficient and offer increased thermal insulation for the highest performance. So, they are sustainable in terms of energy, and will save money on fuel.

Sustainability

More steel is recycled globally each year than the combined total of glass, aluminium, plastic and paper. This means that many steel frames are 100% recycled and sustainable.

Fabco has produced a set of drawings to show their proposals for each of the windows. On each page of those drawings, the central blue coloured illustration shows the proposed appearance, and there are also detailed sections of the glazing bars and frame. The drawings have been included in this statement as Appendix 1. In order to provide clarity as to what type of window or door is to be used in different parts of both buildings, Appendix 2 provides a photograph of each elevation, with the windows/doors numbered to correspond to the Fabco schedule.

Where there remains single glazing at present, it will be replaced by 18mm double glazing (often described as slimline). The principle of double glazing had been accepted through the 2010 permissions and, as set out in Section 5, the pre-application advice confirms their continued and extended use would be acceptable. Therefore, in this statement we do not set out the significant sustainability advantages of using double-glazing, nor do we refer to “Adapting Historic Buildings for Energy and Carbon Efficiency”. Historic England Advice Note 18 (HEAN 18), provides very helpful guidance on whether replacement of windows by double-glazing is appropriate. In the pre-application advice, the officer quotes sections of Advice Note 18, as below:

“Point 81: Installation of slim-profile or vacuum double-glazing within historic frames will generally be acceptable.

- The use of slim-profile or vacuum double-glazing can allow the installation of double-glazing in historic buildings alongside the retention of existing window frames.*
- Many historic window frames will be capable of accommodating such glazing. Original glazing bars should be retained, and windows should be refurbished and draught proofed at the same time to fully benefit from double-glazing. Sash windows may need heavier weights to balance the increased weight of the glass.*



- *Exceptions in which such installations are unlikely to be acceptable will include windows which retain historic glass of interest, windows of historic or architectural interest whose frames / glazing bars cannot support slim-profile or vacuum double-glazing, and windows with leaded lights.*

Point 82: Replacement of windows which do not contribute to the architectural or historic interest of a building with double-glazed windows of appropriate material and pattern, will generally be acceptable.

- *Many historic buildings have windows which are relatively recent and do not contribute to a building's special interest. In such cases, their replacement with double-glazed windows of an appropriate material, glazing bar pattern and detailing is likely to either have a neutral impact or to enhance significance.*

The situation at The Old Stables is rather a combination of all of the above – the precise original detailing is not known, but the existing are not untypical of windows in this type of building. They have permission to be replaced, so the principle of this has been established.”

We agree with the conservation officer summary of the situation and are pleased that double-glazing of the type proposed is acceptable. Therefore, in assessing the impact of the proposals on the heritage assets in Section 8, we do not consider this matter in much further detail. However, it is a factor in weighing up the possible “harm” to the assets as against the benefits.

6.2. Summary of proposed changes to windows and doors

In considering these changes, it is appropriate to consider the proposals both for the house (The Old Stables) and for the annexe (previously the garage). The proposals for windows and doors are also set out separately.

To understand the proposals, it is advisable to compare the existing elevations for the house, as shown in Drawing 05350-01-A, Sheet 01, with the proposed elevations, which are shown in Drawing 05350-01-A, Sheet 02.

In terms of the drawings for the annex, the existing elevations are shown in Drawing 05350-02-A, Sheet 02. The proposed elevations are shown on Sheet 04.

In addition, further clarity is provided by the door and window numbering schedule submitted with this proposal, and comprising photographs of both buildings with annotations.

The house

In respect of the doors:

Item 10 is the Juliet balcony over the main door of the house. The two-door timber form will be retained in replacement doors, but steel would be used.

Item 18 is the main door to the house. The double timber door will be replaced by a single timber door, and two lights will be replaced by one.



Item 19 is currently a stable door form on the right of the main elevation. There will be a like-for-like replacement.

Item 17 is a single personnel door. It will be replaced by a stable door of the same design as for Item 19.

The two large double doors (Items 8 and 9) will each be replaced by a double door with fixed lights on either side. The timber shutters to both sets of doors will be replaced by similar timber shutters, but the positioning of the hinges would alter. Presently, the hinges are attached to a timber post, but it is proposed that they would attach on the internal face of the stone coining. Drawing 05350-01-A, Sheet 05 shows the existing and proposed doors in plan form. That is as if one were seeing a section from above. There would thus be a slight difference in appearance, but the overall impression when the shutters are closed would be the same as at present. Clearly, when the shutters are closed, the change in doors would not be discernible.

The present door is made of timber, but the proposed door would be of steel, as would be the frame to the side lights. The size and design of the door would be similar to the present, but the steel would help integration with the proposed steel windows.

In summary, the proposals for the windows in the house are:

- In the house, windows 1 to 5 will remain with 6 panes, but the material will be steel and not timber, and the position of the window within the opening will alter. The drawings 05350-01, Sheets 01 (existing) and 02 (proposed) illustrate that change in position. The existing 24mm timber window is set within the stone and held by a timber infill. The proposed windows would be 18mm slimline (conservation style) in profile. They would be brought further forward to replicate the typical position of windows of the nineteenth century of this type, and in the same position as many other windows on older buildings in Keevil (see Section 7.2). There would be a steel infill to hold the windows, and the internal gap produced by the change in position would be made good by sand and cement render and plaster. The internal timber cill would be replaced by a deeper one.
- Windows 6 and 7, in the gable end of the house and facing Martins Road respectively, are unusually deep. So, while taking the same form as the other, smaller windows, they would have 9 panes. Due to the size of the window 6 opening, the bottom 6 panes will form an opening window, similar to windows 1 to 5, and the top 3 panes will be fixed. Window 7 (facing Martins Road), which is currently fitted with opaque glass, will be a fixed 9 pane window (non-opening) in clear glass.
- It is also intended to replace the existing concrete window cill to window 7, with a new stone cill to match all of the other windows in the property.

The annex

The South and East elevations of the annex will not be altered.

Item 11 shows a 5 unit timber sliding door in the North elevation of the annexe/garage. It will be replaced by two pairs of double doors on either side of a fixed light. The doors will be made of steel and will include glazing bars to match those of the windows of the house.



In the North elevation there is currently a timber window above the doors that is a fixed single timber unit (Item 12). It will be replaced by a similar shaped window, but divided into four fixed panes.

In the West elevation, the windows (items 13,14,15, and 16) are currently made of timber divided vertically into four fixed lights. It is proposed that they would be replaced by steel windows to match those of the house, and that they would be divided by a horizontal glazing bar into eight lights, again to mimic the general design of windows in the house. Currently, the windows are fixed, but it is proposed that they will be capable of being opened, and that they would be top-hung.

As described earlier, the officer expressed initial concern over the position of the window and its form of opening, but is now reconciled to the limitations the existing building sets, and considers those proposals acceptable.

7. Character of the Heritage Assets

In this section we describe the heritage assets in adequate detail to provide adequate background information for the planning authority to appreciate their significance and for an assessment of the impact of the proposals on the assets to take place. In this case, there are two relevant heritage assets. The first is the listed building now known as The Old Stables, and the second is the conservation area of Keevil.

7.1. The Listed Building

The building was originally listed as part of Longleaze Farm in 1968, but is now listed separately because it now falls within its own curtilage. The citation for the Grade II listing states:

7/158 Stable and carriage house at
Longleaze Farm
(formerly listed as outbuildings
11.9.68
at Longleaze Farm)
GV II

Stable block. Mid C19. Rubble stone, double Roman tiled roof.
North east side facing yard has central segmental-headed planked door with two pivot-hung 6-pane windows to right and one to left with double planked doors to left, all segmental openings with keystones. Gabled loft with segmental-headed planked door to centre. To left is single-storey tack and feed room with segmental-headed planked doors and 6-pane window, ashlar stack. Rear facing road is windowless except for planked loading bay to loft to left.

The previous function of the building was both a stable and a carriage house. It is clear that the detail of the windows and doors is significant in the description, and therefore attention needs to be paid to



window design for the future, to ensure the character of the building is retained. Having said that, the previous permissions, achieved many years after listing, have altered the design of the windows and additional windows have been added.

The current proposal would not prejudice the character of the listed building other than, potentially, through alteration to doors and windows.

7.2. Keevil Conservation Area

In submitting an application that has potential for impact on a conservation area, which is a recognised heritage asset, the heritage statement has to describe the character of that area, before considering what impact the proposals might have. Keevil's Conservation Area was designated in 1973 to 'preserve and enhance the special architectural and historic interest' in some parts of the village, as shown in the map in Figure 2 of this heritage statement.

In considering the character, one would normally benefit from a conservation area statement produced by the planning authority, but none exists for Keevil. There was a village design statement produced by the parish council in 2003, but that has now been largely integrated into a Keevil Village Planning Policy, which was approved at an Ordinary Meeting of the Parish Council on the 03 March 2025.

Although this 2025 document states that the village design statement "*describes the character of village buildings, street pattern, trees and open spaces*", there is no evidence that it actually does so. The original and current documents set out design guidelines under six headings: Village setting; Street furniture; Village context; Settlement; New Building; and Transport that set out useful principles such as that for new buildings below:

- NEW BUILDING**
- Any future development in the village, including extensions to existing buildings, should respect the building types and details of the central area around Main Street and its immediate environs.
 - Any new building should incorporate materials and designs in harmony with the built environment.
 - Within the conservation area, or where new development may affect the settings of listed buildings, the preservation of their special character will be the primary consideration.

However, there is no summary – as often found in conservation area appraisals – of "*the building types and details*".

Our position is that, as the only changes would be to windows and doors, much of the "policy statement" is not relevant. The only materials that would be altered are also those for doors and windows.

In the absence of adopted statements about the character of the conservation area, and particularly the windows of other listed and notable buildings in the conservation area, we set out below some photographs showing existing windows in such properties in Keevil. Please note the windows in all the properties are made of steel.



Figure 12 - Grade 2 Listed - the coach house and stables at Blagden House



Figure 13 - Grade 1 Listed - Keevil Manor



Figure 14 -Grade 2 Listed - Box Tree Cottage. The closest property (c 30 m away from site boundary)



Figure 15 - Grade 2 Listed - 79 Main Street



Figure 16 - Grade 2 Listed - Beach House



Figure 17 - Grade 1 Listed - Talboys

There may be more properties within Keevil that have steel windows.



Not only do the above examples use steel, they also all have their windows set within the stone work. When the windows of the Old Stables were entirely replaced in the early 80s by the property's previous occupants, they were fixed behind the stonework, to make it cheaper. It had nothing to do with matching what went before it. The current proposals thus seek to align with the typical window styles within the village, by seeking to place the windows within the stonework, as is typified by the section in Figure 18 below. The section is copied from the submitted proposed window details in Drawing 05350-01-A, Sheet 04.

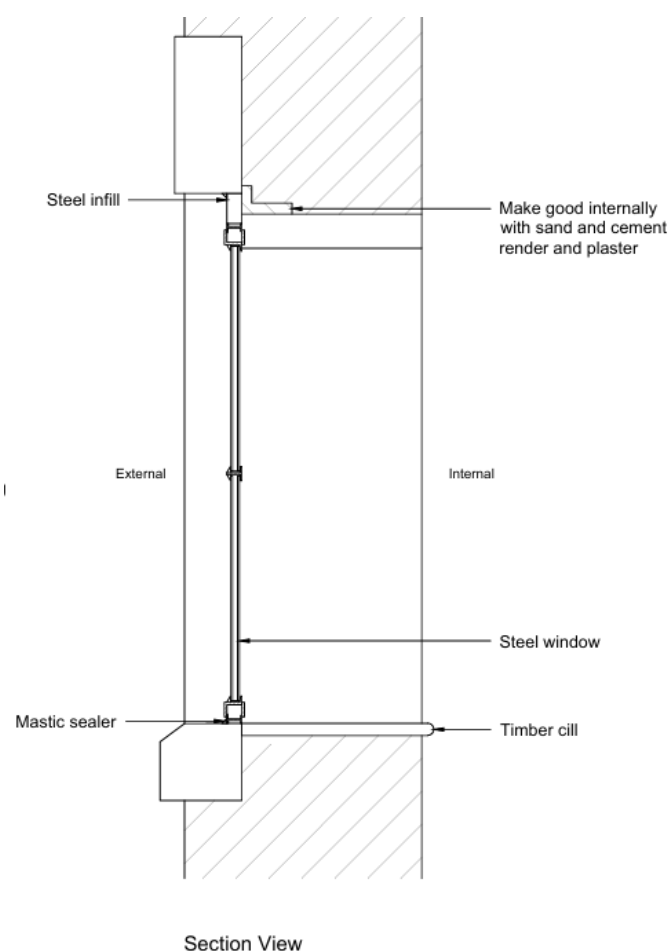


Figure 18 - Proposed window section to correspond with others in the village, to be read alongside drawing 05350-01-rev B – sheet 04

In the pre-application advice, the council's conservation officer wrote:

"The main consideration is the impact of the proposals on the special interest of the listed building. The character and appearance of the conservation area is a secondary consideration for this particular proposal: as the impact on the special interest of the listed building takes precedence, there is little need to go into protracted discussions about the conservation area, as it is given that if proposals do not cause harm to the listed building, they are unlikely to cause harm to the conservation area."

We concur with the above comments, and therefore we consider that no further analysis of the character of the conservation area is necessary. Nonetheless, in Section 8 we do pay attention to potential impact on what is here, in effect, a secondary heritage asset.



8. Impact on Heritage Assets

In assessing the impact of the proposed development on the character of the conservation area and on listed buildings (specifically on the setting of 41a Main Street) we have paid heed to Historic England's *"The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), 2017"*. We contend that the proposal would have negligible or neutral wider effects on the area, in terms of overall land use pattern, in respect of public views, on public access, and overall form.

In this section we address, in turn, the impact on the conservation area and on the listed building. We consider the latter to be the more significant.

In setting out our interpretation, we use the baseline of the works that could be undertaken to the building under the consents gained in 2010, and not the situation as presently constructed. So, in particular, we argue with vigour that the principle of double glazing has already been accepted by the local planning authority. So, it is neither reasonable, nor would it withstand legal scrutiny, for the local planning authority to argue that the replacement windows should either all be single glazed or be single glazed with secondary double glazing internally.

8.1. Impact on the character of the conservation area

There is only one elevation of the listed building that is readily visible to the public at close quarters, and that is the West elevation. This is shown in Figure 19, where it is evident that there is only one window. That is a high level one and one that is currently not possible to see through because it was constructed of frosted glass, as the room it serves was formerly a bathroom. Moreover, it currently has an unsightly extractor vent within it, which would be removed under the proposals.



Figure 19 - View from Martins Road

Therefore, the degree of public views of the changes proposed is very limited. It is therefore reasonable, that we consider to regard the impact on the character of the conservation area to be negligible. We recognise that the National Planning Policy Framework (NPPF) does not recognise the significance of impacts using the same scale as applied to Environmental Impact Assessment. Instead, it uses the somewhat inflexible categorisation of substantial harm; less than substantial; or no harm. There is no reason for one to consider that there would be substantial harm, as might be caused, for example, by significant partial demolition. There would be a change in appearance, however, a change does NOT necessarily mean that harm would accrue.

Our position is that, in terms of impact on the conservation area, the change would NOT lead to harm. Indeed, the general public impression would be that the removal of the vent unit and, the change from the dried out timber windows would be beneficial. We consider that the position of the window within the stonework would not be material to the impact on the conservation area, and reflects the practicalities of upgrading the windows without damaging the fabric of the building.

There are no known cultural associations related to the conservation area that would be impacted by the proposals.



8.2. Impact on the listed building

In Section 6, we have set out the proposed works, and that section should be read in concert with the appendices and the drawings of sections submitted with this application. We consider that the changes can be summarised as follows:

- Alteration of material from timber to steel in patio/balcony doors and all windows and an associated change of colour to black;
- Changes in glazing bars to achieve a greater consistency of form across the two buildings;
- Alteration in the position of the windows and doors within their openings in the main house;
- Modification in the position of the hinges for the two external timber double doors on the house.
- Replace the 3 timber personnel doors on the North East Elevation of the main house, with timber doors.
- Replace the existing concrete window cill to window 7, with a new stone cill to match all of the other windows in the property.

The above list of changes does NOT include the introduction of double-glazed units, because that has already been sanctioned through the 2010 consents. The officer's comments made then, in terms of thermal efficiency, have even greater weight today. However, we contend that the use of double-glazing throughout is not a matter to be addressed in the application and, as described earlier, the conservation officer considers its use is acceptable in this instance.

If one considers, in turn, the implications of the changes set out above on the integrity and interpretation of the listed building, it is clear that they are limited and acceptable.

The use of black steel

Steel has been used for windows on many buildings of greater heritage significance than The Old Stables. We have set out the general advantages of steel windows in Section 6. At this site, their use would achieve a consistent approach in terms of colour and form, and more light would be let into the house. The longevity of the product will mean that there is likely to be less future intervention for maintenance or replacement of windows that might jeopardise the structural integrity of the listed building. Therefore, we consider their use to be advantageous, and there would be NO harm caused to the property, but rather a BENEFIT.

The conservation officer has declared she is content that steel is acceptable and that change of colour to black is also acceptable.

Changes in glazing form, especially through the introduction of glazing bars

This measure would also lead to a consistent approach in terms of appearance throughout the two buildings, ensuring that they are perceived as principal and subservient structures. The consents achieved in 2010 would have led to a more "modern" appearance through the division of the windows (typically) into two. It is interesting to note that the officer's report for the 2010 applications did not address this issue, which we consider is material in seeking to create a more traditional appearance. This proposal would maintain the current smaller panes, which we consider beneficial. In terms of the smaller windows, there would be no change and so the impact would be neutral, but the changes to other windows would be beneficial.



The changes to the form of the windows in the annexe/garage needs to be considered in its position as part of the setting of the listed building. Again, we believe that the integration of character of fenestration would be advantageous. Indeed, the common design approach serves to achieve visual integration better.

Again, the conservation officer is content with retaining the shape of the windows and to modifying their glazing pattern.

Alteration of the position of the windows and doors in their openings

The proposed steel windows, patio/balcony doors, and timber personnel doors will be set within, and at the back of the stone reveals. With the present timber windows and doors being set behind the stone reveals.

The change in means of hanging the revised double timber coach house doors has been described earlier, with the hinges fixed to the building's stone coining. We consider that the change will allow for better integration of the doors with the building, and no negative visual impacts or on the interpretation of the history of the former stables building.

Again, the conservation officer is content with setting all windows and doors within, and at the back of the stone reveals.

The function of the opening windows

In her written pre-application advice, the conservation officer advised:

"My concern is how the proposed units are to function – the way they open outwards is not an historic or traditional form of opening for traditional windows, and whilst character is retained when the windows are closed, the character distinctly changes once opened. Therefore this aspect of the proposals needs to be amended – top opening lights that open inwards would be appropriate for the building. These will result in a horizontal mid-rail that is slightly chunkier due to the hinging, but the opening function is more appropriate for the building type. That said, it is not traditional for many historic buildings, not just this former stable block, as it is much more Modernist in style, and therefore inappropriate here."

This advice on the windows was given before the conservation officer had the opportunity to visit the property, and to examine the form of the existing windows and recognise both their position in their openings, and the implications for the fabric of the building.

Figure 11 showed a typical window in the house, having been released, from the outside. Figure 20 shows the same window viewed from the inside. In both cases, it can be seen that the window is centrally hung, with the lower part opening outwards. The second image, in particular, shows that, were one to alter the means of hanging to the top, the visual interpretation of the open window would remain very similar, with the bottom of the casement opening out over the stone cill.

A window opening inwards would also reduce the internal space and negate any use being put to the window cill. Therefore, there are good practical reasons why a top-hung, opening out, window should be utilised in this building. In addition, as accepted by the officer, there is no one uniform "traditional" design for former stable blocks.

Mounting the new windows in the stone reveal, means the windows cannot open internally (top hung or centre pivot), without considerable alternation to the fabric of the building, because the internal



reveals do not match the external reveals. Therefore, an internally opening window would clash with the internal arched head of the reveal.

No manufacturer can make a fully secure centre pivot window in steel. The Fabco top hung windows are provided with their own warranty, and certification in relation to security.

We believe, though we have not had any written confirmation, that the conservation is reconciled to the proposed form of window opening, especially as we have now provided drawings *“that confirm the depth of reveal i.e. how deep the windows will be set into their openings”*. As can be seen from the window sections, the proposed steel windows will be set within, and at the back of the stone reveals. With the present timber windows being set behind the stone reveals, we believe the difference will not be discernible.



Figure 20 - Internal view of typical existing window

Summary

In summary, we consider that, unlike many changes proposed to listed buildings, there is no material harm caused. Indeed, we believe with conviction, that there would be benefits to the listed building and how one interprets its design and history. This position is taken even before weighting the impacts



against the perceived public benefits. In terms of such benefits, they are explained in Government guidance⁵. They include:

- *“sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long-term conservation”*

We consider that the measures we propose would achieve all three of those benefits. It is important to maintain a property in good order and to secure beneficial use in order to safeguard the significance of heritage assets. It is evident that the applicants’ intentions, as reflected through these plans would secure a long-term future for the listed building. Moreover, by proposing integration in general fenestration form over the two buildings, the setting of the listed building would not be negatively impacted.

Moreover, as we have also explained, there would be an environmental benefit to be derived. Historic England, in its advice on the use of carbon efficient measures⁶, makes clear that *“delivering environmental objectives is a public benefit, but that they ‘should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit.”* In this case, there certainly would be private benefit, but Historic England (and Government Inspectors) accepts that the cumulative impact of incremental energy savings across development would lead to public benefit. If one were to undertake a “planning balance” exercise, we contend that there would be greater weight in favour of the proposals than against them.

9. Planning Policy

We believe we have accorded with national and local planning policy and with guidance from Historic England, the Government’s advisors on heritage issues.

9.1. National Policy

As well as the good practice guide produced by Historic England, to which reference has already been made, there is policy on managing the impact on the setting of heritage assets in the National Planning Policy Framework (NPPF), currently dating from December 2023.

Section 16 of the NPPF is devoted to this subject. Its text includes the following:

“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*

⁵ Guidance On Historic environment. Advises on enhancing and conserving the historic environment. From: [Ministry of Housing, Communities and Local Government](#), [Ministry of Housing, Communities & Local Government \(2018 to 2021\)](#) and [Department for Levelling Up, Housing and Communities](#)

⁶ Adapting Historic Buildings for Energy and Carbon Efficiency Historic England Advice Note 18 (HEAN 18)



- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.*

Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

We consider that the current proposals both “enhance or better reveal (the) significance” of the heritage assets. Therefore, we argue that the proposal should indeed “be treated favourably.”

In terms of the impact of development on the setting of assets, para 200 of the NPPF includes:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.”

Details of the description of the assets have been set out in this statement to the degree from which can understand the potential impact.

Para 205 of the NPPF is key. It states:

“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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

The NPPF fails to point out that there may be cases where there is no or negligible harm. As we have previously stated, we are not at all convinced that there would be harm caused to the assets by the proposals. However, even if one were to conclude that the degree of harm would be “less than substantial”, the public benefits would outweigh it.

Para 206 then states:

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”

Interpreting para 206 would suggest that, if there is no or negligible harm caused to the setting, no justification should be necessary. Nonetheless, we believe that justification for the works has been fully set out, as has been the design and operation of the windows.

9.2. Local Policy

At the time of writing, the main planning policy for Wiltshire is its Core Strategy, together with “saved” policies from the previous local plans, though new policy documents are emerging. However, it is worth noting that part of the design policy under Policy 57 includes the following criteria:



iii. 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. As explained earlier in this statement, many of the criteria in the policy are not applicable here, because of the limited nature of the proposal, but the change in materials is relevant. Given the number of steel windows already in Keevil, we consider the use of steel is a “positive response”.

iv. being sympathetic to and conserving historic buildings and historic landscapes. As set out in this statement, the use of different materials and the form of fenestration would be in character with the listed building specifically and the Conservation Area in general.

xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm. We have made clear that the windows would be supplied and fitted by a reputable company whose portfolio on conservation projects is considerable.

Core Policy 58 is the most important policy in respect of heritage. Its introductory paragraph 6.135 states:

“Core Policy 58 aims to ensure that Wiltshire’s important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire’s environment and quality of life.”

Much of the ensuing text sets out the full range of heritage assets covered by the policy. Of these, only listed buildings, conservation areas and *“the individual and distinctive character and appearance of Wiltshire’s historic market towns and villages”* are relevant to this proposal. Even in those areas, there is reference to a pragmatic approach, as in para 6.138:

“Designation of a conservation area, listed building, or scheduled ancient monument does not preclude the possibility of new development and the council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern living aspirations. Such alterations will only be acceptable where they are consistent with the conservation of a heritage asset’s significance. Consequently, it is expected that development will be of the highest standard in order to maintain and enhance the quality of the area or building, and be sensitive to its character and appearance. In considering applications for new development in such areas, the council will seek to ensure that the form, scale, design and materials of new buildings are complementary to the historic context.”

Therefore, we look forward to the local planning authority working with us to achieve a “positive solution” to achieving a long-term solution for windows and doors at this site.

We have also paid heed to the Wiltshire Design Guide⁷ in as much as it provides advice on windows in historic environments. At 4.5.18 it suggests that “off the peg” components, such as windows, should

⁷ Shaping the future: My Place, Your Place, Our Place, Adopted 2024



be avoided, as has been so here. The text then states, in respect of windows *“attention (should be paid) to glazing bars patterns, cills, lintels and depth of reveals”*. We believe that the detail we have provided accords with that advice.

We have reviewed the policy context set out in the pre-application advice and believe we have addressed all relevant documents.

10. Conclusion

We believe that the proposals submitted at this stage demonstrate our clients’ commitment to high quality materials and design, and their desire to respect and protect the historic environment. We have taken particular note of the comments given in the pre-application advice, and also provided in the subsequent site meeting with the conservation officer.

We have submitted the proposals following the officer’s guidance that listed building consent is necessary for the proposals to The Old Stables, that is the main house, and that planning permission is needed to permit the proposed works to the annex.

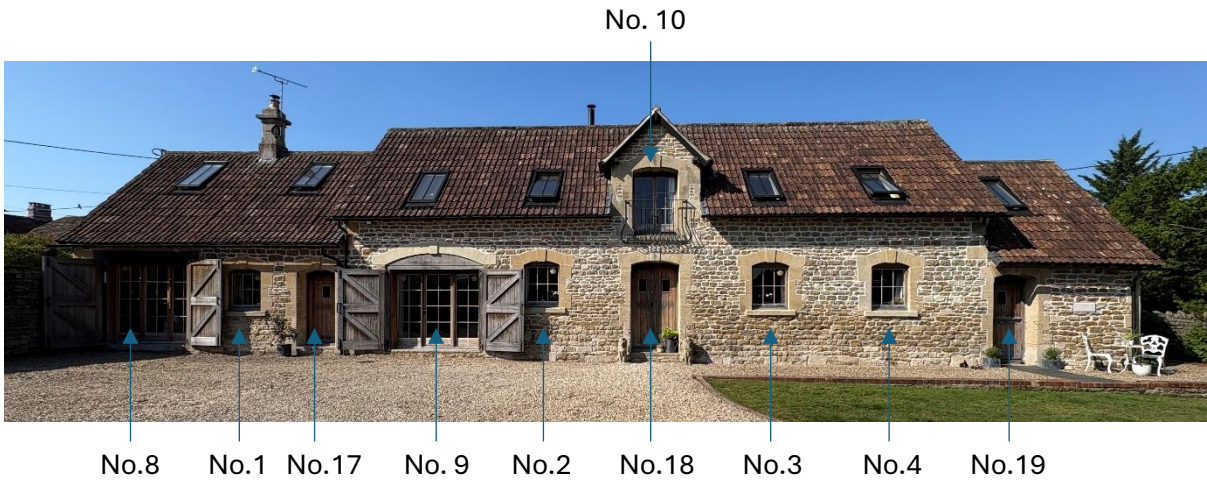
We consider that the level of detail now provided and discussed with the conservation officer is adequate to enable “safe” consents to be granted, with the application of appropriate and necessary conditions. This will ensure the long-term safeguarding of the significance of the listed building and its immediate context, and the maintenance of the character of the conservation area. Indeed, we strongly contend that the works would not simply be acceptable, but would be of positive benefit to the heritage assets.



Appendix 1 - The Old Stables - Door & Window Numbering Schedule

The Old Stables
Door & Window Numbering Schedule

The Old Stables



The Old Stables
Door & Window Numbering Schedule

Annexe



No.13

No.14

No.15

No.16

No.12

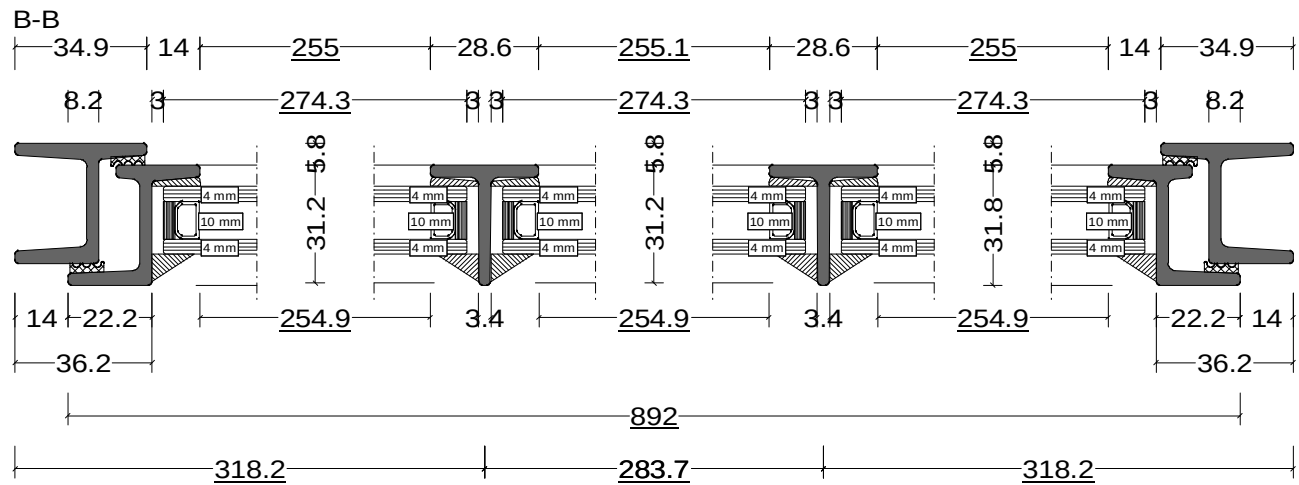
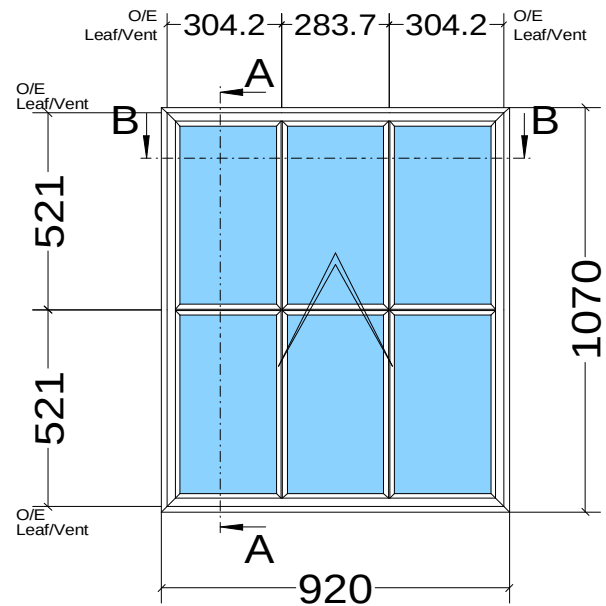
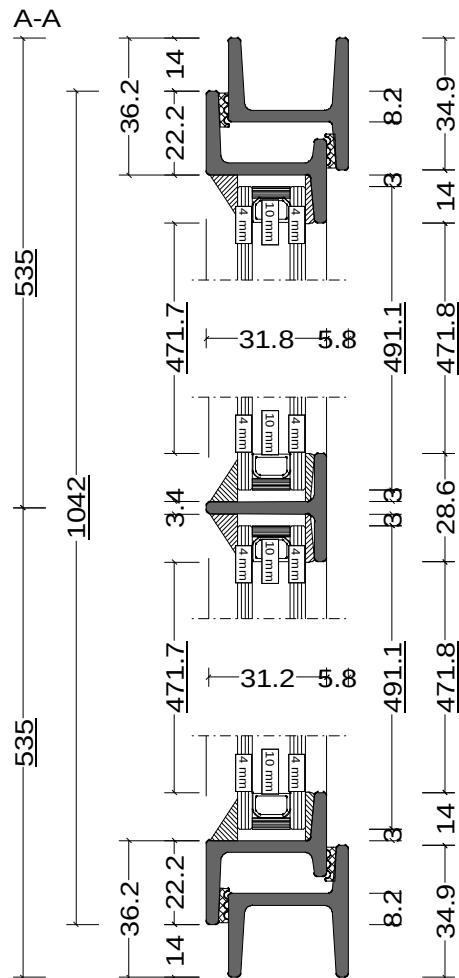


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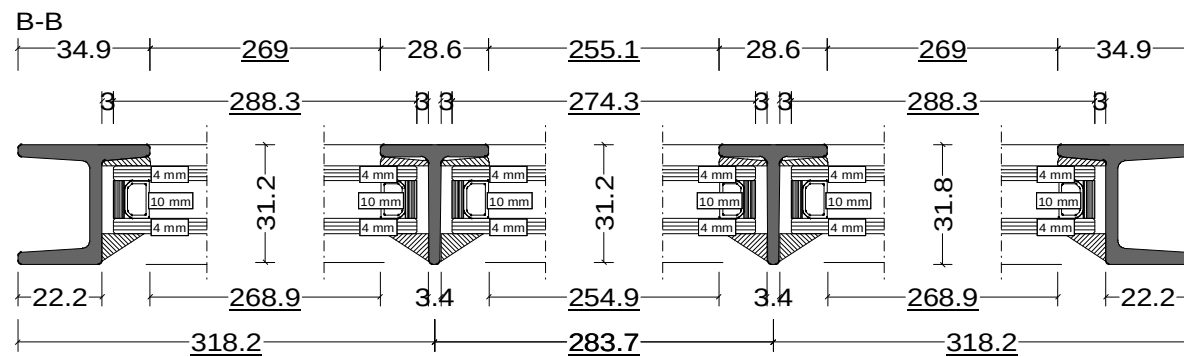
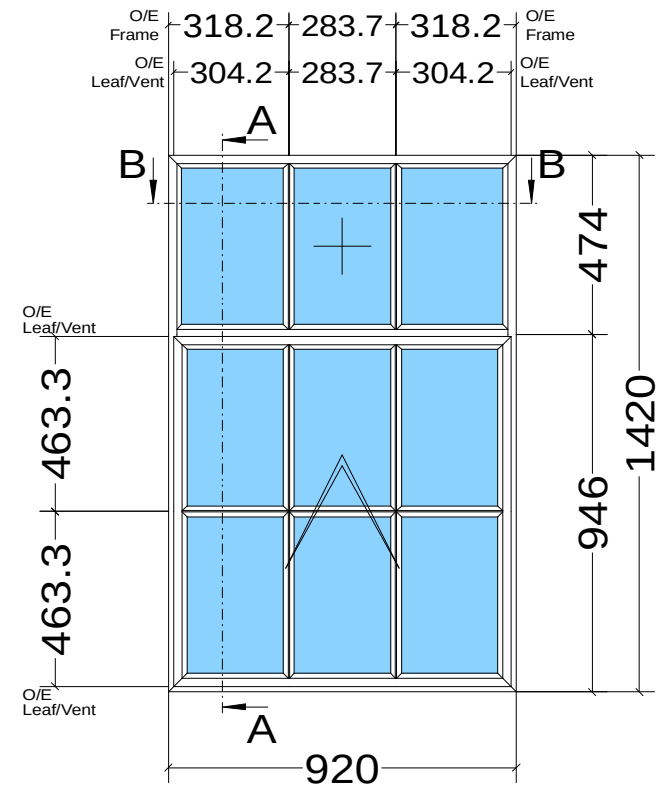
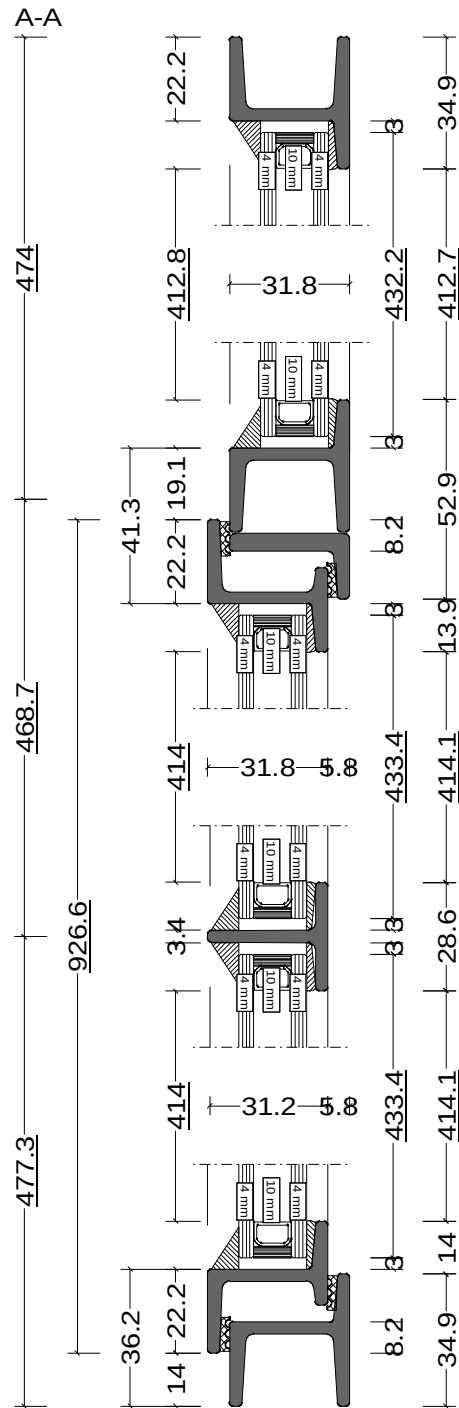


Appendix 2 - Proposed window details and sections, provided by Fabco Sanctuary

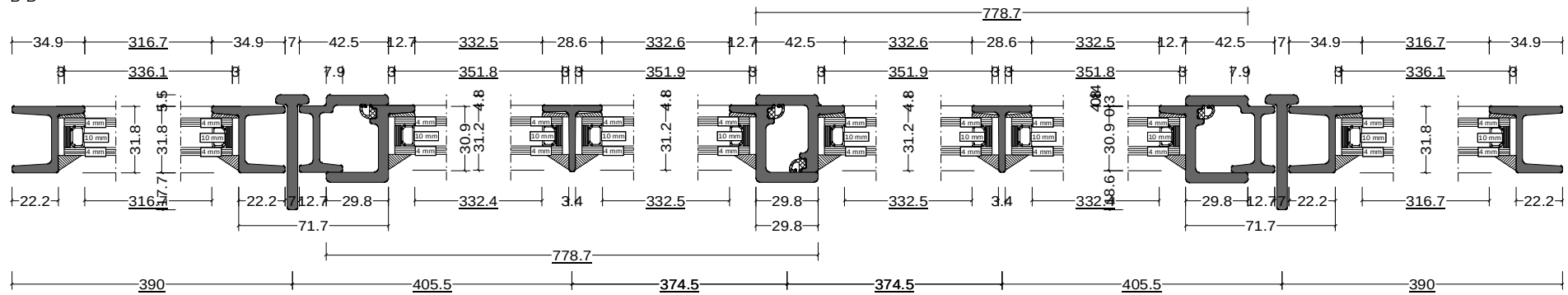
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Job: DD2058



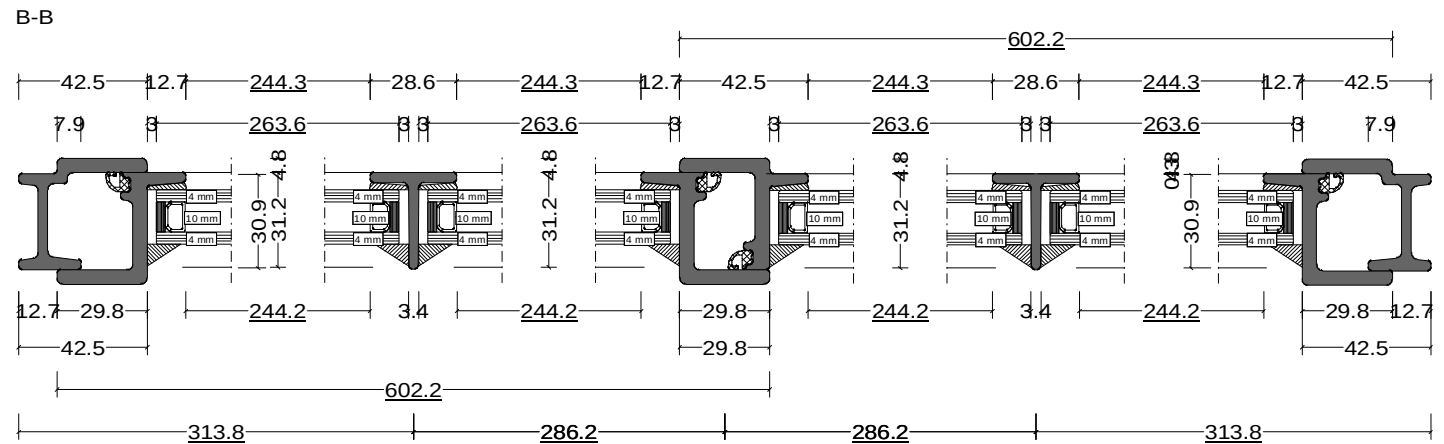
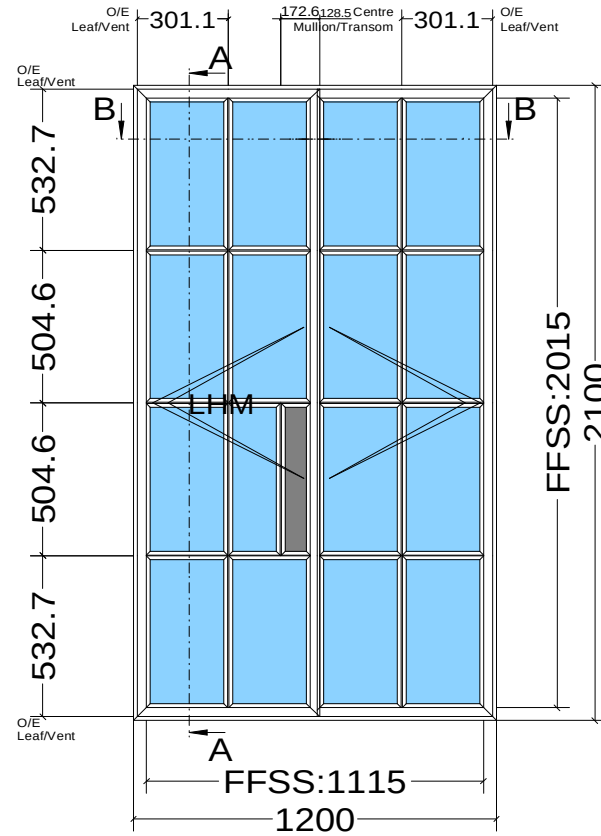
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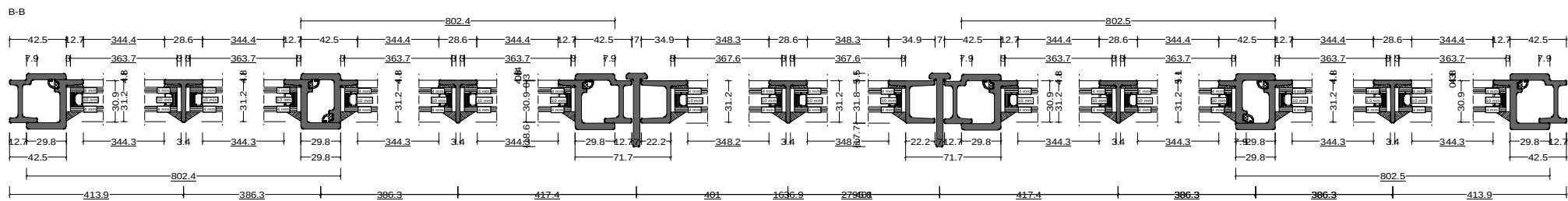
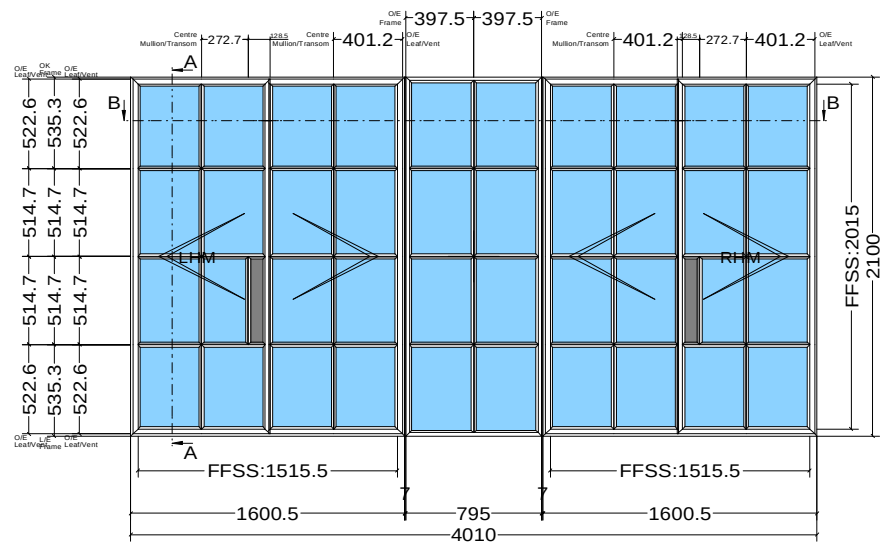
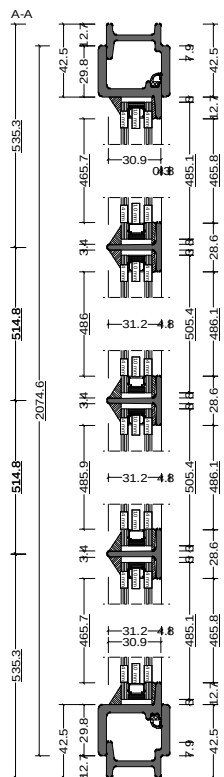
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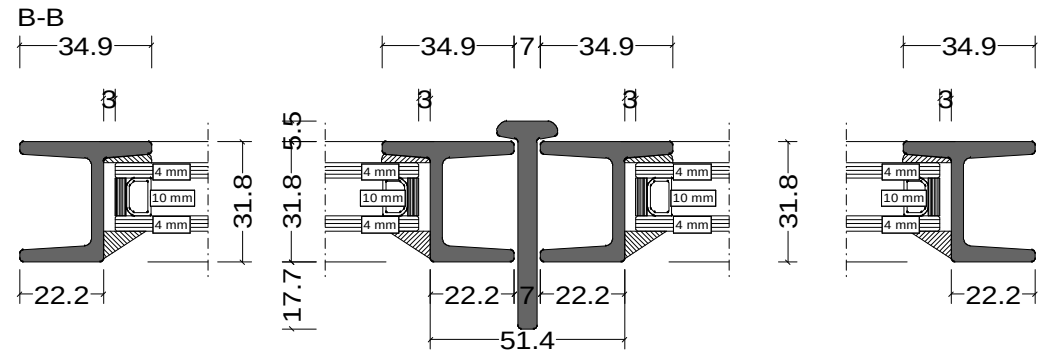
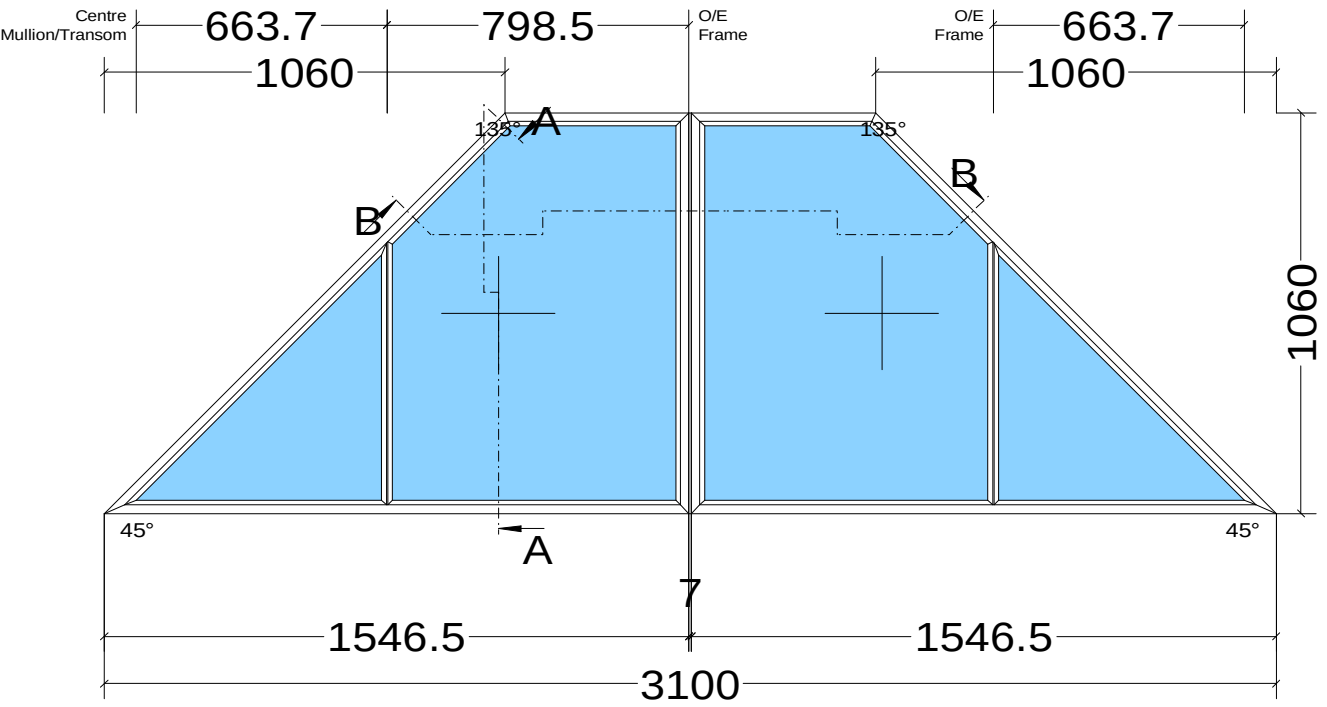
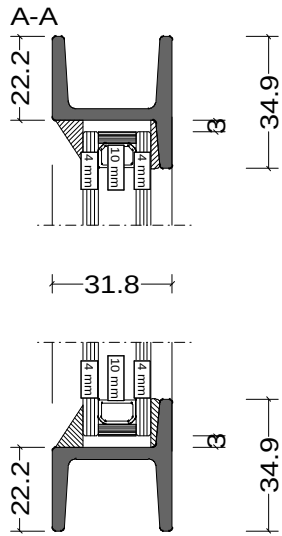
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Job: DD2058



Pos. Item 12, Quantity: 1
Finish: RAL
Job: DD2058



Pos. Items 13-16, Quantity: 4
Finish: RAL
Job: DD2058

