

16th October 2025

Our Ref: DJD.LPC.6128

Planning Services
Development Services – North
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Dear Sir or Madam,

Town and Country Planning Act 1990
Planning (Listed Buildings and Conservation Areas) Act 1990
Replacement of all timber frame casement single glazed windows at property
with timber frame casement double glazed windows (Retrospective)
7 Park Street, Charlton, Malmesbury, SN16 9DF

HERITAGE ASSESSMENT AND DESIGN & ACCESS STATEMENT

The application site comprises a mid-terrace estate Cottage which is a Grade II Listed Building located within the village of Charlton and within the Charlton Conservation Area. The List Entry (which includes No. 8 Park Street) which is set out below: -

ST 98 NE CHARLTON PARK STREET (north side)

6/31 Nos 7 & 8

12.12.51

GV II

Two row cottages. Late C17 with C20 alteration. Coursed rubble with wooden and concrete lintels and stone slate roofs with one ridge stone stack and one right end stone stack. No 7 has south front of single-storey and attic, 2-windows. Windows are 2 and 3- light casements, those to attic under gables. Central part-glazed door in deep reveal. No 8 of L-shaped plan with advanced gabled wing to left and further gable to parallel range. Two storeys and attic. Windows are 2 and 3-light casements, those to parallel range with small pane glazing. Segmental-headed doorway off-set to left in advanced wing giving access to passage with 2 doors: that to right part-glazed, that in front of oak planks set in moulded architrave with double indentations at the head. Low dressed stone boundary walls with square gate piers.



Main front façade of 7 Park Street Charlton

Heritage context and significance

As mentioned, the property is a Grade II listed building and derives significance from its age, surviving fabric and the composition of its principal elevations, including the pattern, proportion and detailing of its windows. Windows on buildings of this period and type are commonly a key element of the architectural character: their material timber, casement form, moulding profile, glazing pattern and interaction with the surrounding masonry and reveals contribute directly to the building's special interest.

Summary of the works

The works, which are retrospective, comprise replacement of the previous timber single-glazed casement windows with timber-framed casement double-glazed units. It is not known exactly when these replacements were carried out but it is assumed that this was done during the late twentieth century, possibly in the 1990s or early 21st century.

The submitted drawing ref PL12 details show the intention to retain timber as the framing material, to retain the flush casement profiles which replicate (where shown) the visual proportions of mullions, transoms and retain the glazing arrangement. The retrospective replacement therefore preserves the external appearance of traditional casement joinery while improving thermal performance and ongoing durability. These intentions and the technical drawings are recorded in the application documents.

The primary practical justifications for carrying out the replacement are: to improve thermal performance and reduce heat loss from the building, to reduce condensation and associated damp risks that can accelerate timber decay, to improve occupant comfort and energy efficiency, and to secure the continued viable use and repair of the building by installing units that are more robust and require less frequent intrusive intervention than poorly performing single-glazed units in poor condition. In many historic buildings the absence of appropriate thermal comfort and the costs of intensive ongoing repair can lead to neglect; appropriately detailed replacement windows can secure long-term care of the asset and reduce pressure for more harmful interventions. Historic England's retrofit guidance recognises that where repair is not possible or where historic fabric is beyond reasonable repair, replacement using like-for-like materials and careful detailing may be appropriate, and that consideration should be given to whole-life carbon, thermal performance and conservation of the remainder of the building.

Planning Legislation & Relevant Policy

The most relevant legislation to this application is considered to be the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

With respect to any buildings or other land in a conservation area, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Development Plan Policy

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that all applications are determined in accordance with the Development Plan unless other material considerations indicate otherwise. The relevant Development Plan policies applicable to the assessment of this application comprise the adopted Wiltshire Core Strategy (January 2015). The relevant planning policies therein to the assessment of this application are believed to be Core Policy 57 (Ensuring High Quality Design and Place Shaping) and 58 (Ensuring the Conservation of the Historic Environment)

Core Policy 57 makes clear that applications should make a positive contribution, having regard to the compatibility of adjoining buildings and uses. A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Proposals should respond 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. Additionally, the policy is supported by your Council's adopted Design Guide.

Appendix D therein advises that a well-designed householder development that respects the original building and the neighbouring properties by being subservient, should seek to fit into the general street scene too. These aims will usually be achieved by replicating the style, form, rhythm, materials and architectural detailing of the original building.

Core Policy 58's principal aim is to ensure that new developments protect, conserve and where possible enhance the historic environment. This includes buildings and structures of special architectural or historic interest and the special character or appearance of conservation areas. Overall, Core Policy 58 emphasizes the importance of preserving Wiltshire's heritage for future generations.

National Planning Policy Framework (the NPPF) December 2024 - Latest Version

Section 16 of the NPPF deals with conserving and enhancing the historic environment.

Heritage assets, ranging from local buildings to internationally recognized World Heritage Sites, are irreplaceable and should be conserved in ways appropriate to their significance, ensuring they can be enjoyed by future generations. Planning policies should support the conservation of these assets, especially those at risk due to neglect or decay. (Paragraph 202)

A positive strategy should be developed for conserving and enjoying the historic environment. This includes sustaining and enhancing the significance of heritage assets; Highlighting the wider benefits conservation brings to social, cultural, and economic well-being; and ensuring new development contributes positively to local character and distinctiveness. (Paragraph 203).

Applicants must describe the significance of any affected heritage assets and their settings. Local authorities should assess the significance of heritage assets when considering development proposals, taking expert advice when needed. Developers should consider whether their proposals will harm the conservation of the historic environment and, where applicable, justify any harm. (Paragraphs 207-210)

Great weight should be given to the conservation of a designated heritage asset. Proposals that harm the significance of a heritage asset must justify this harm through clear and convincing reasons. Substantial harm or total loss of an asset's significance should be rare and require exceptional justification. Less than substantial harm can be outweighed by public benefits, such as securing the asset's viable use. Development should aim to enhance or better reveal the significance of heritage assets and their settings. Local authorities should also ensure that the benefits of proposals do not outweigh the harm to heritage assets unless the conservation of the asset can be secured. (Paragraphs 212 - 221)

Significance can be defined as the 'value of a heritage asset to this and future generations because of its heritage interest'. Significance is unique to a place and it is vital to identify this, as the aim of conservation is to sensitively manage change

to a place to ensure that its significance is protected, and also revealed, reinforced and enhanced at every possible opportunity.

Assessment of Proposals

The statutory framework requires that works affecting a listed building's character be considered in light of the statutory duty to have special regard to preserving the building or its setting, and national policy requires that harm to a designated heritage asset be identified and weighed against public benefits. The statutory and policy context for listed building consent applications is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and in national planning policy guidance.

The planning test requires an assessment of whether the works amount to substantial harm or less than substantial harm. The retrospective replacement of windows can cause harm through loss of historic fabric, erosion of original joinery details, alteration of sightlines and glazing appearance, and the introduction of glazing units with different visual properties (pane reflectivity, glazing bar depth and putty lines). That said, the degree of harm depends on (a) whether the removed windows were original or of special interest, (b) how closely the replacements match the form, material and detailing of the originals, and (c) whether the replacements introduce features alien to the conservation of the building (for example inappropriate materials, oversized glazing bars, or deep modern sealed units visible on the face of the glazing).

In this case, the proposed timber frame casement double glazing with flush casement profiles and glazing beads are intended to match the original lines. Because the replacements are timber (not uPVC or aluminium), use traditional casement geometry and are drawn to retain existing mullion/sill relationships, the degree of visual change to the façade is limited. Where the replacement windows replicate profiles, sightlines and external joinery details, the visual impact and the degree of harm to the significance of the listed building are likely to be low. On that basis the harm should be categorised as 'less than substantial' and furthermore at the low end of this category. This view is in line with Historic England advice which emphasises repair over replacement but accepts that, where replacement is necessary, using traditionally-styled timber windows with carefully detailed slim glazing units and faithful joinery profiles can limit harm to significance.

Public benefits arising from the works

The public benefits of the proposal are several and material in planning terms. They include measurable energy-efficiency gains for the occupier and reduced operational carbon emissions from lower heat loss; improvements to internal environmental conditions which reduce the risk of condensation and biological decay of retained timber and fabric; an improvement in the long-term durability and weather-tightness of the building that reduces whole-life carbon and the need for future invasive repair; and the retention of timber as the principal material of the windows which maintains the building's traditional appearance in the street. There is also a public benefit in securing the owner's ability and willingness to maintain and care for the listed building: improved comfort and reduced running costs can be

decisive in ensuring that historic buildings are kept in use and in good repair rather than being allowed to decline. Historic England's guidance on retrofit and on modifying windows recognises these public benefits as legitimate considerations in decisions over fenestration, while urging that works be carried out in a way that minimises harm and retains traditional character.

Balancing assessment under paragraph 215 of the NPPF

Paragraph 215 directs that where a proposal leads to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. The harms and benefits described above must therefore be considered together.

The harm is identified as less than substantial. It is principally a limited erosion of the historic window fabric and the loss of the original single-pane glazing character where that fabric has already been removed and replaced. The magnitude of that harm is reduced by the fact that the replacement units are timber, replicate traditional casement proportions and details on the face of the building, and do not introduce visually discordant materials. The submitted PL12 drawings indicate that the replacements are designed to preserve the external appearance, including mullion and sill relationships and flush casement detailing, thereby materially constraining the degree of visual harm.

The public benefits, as set out above, are real and demonstrable. The energy and condensation benefits reduce operational carbon and risk to fabric; the use of timber frames maintains historic character and avoids the particularly damaging appearance and long-term incompatibility of some modern materials; and the increased durability reduces the likelihood of future heavier-touch interventions that could cause greater harm. Taken together these benefits secure part of the building's long-term viable use by making maintenance and occupancy more practical for the owner, thereby providing a tangible public benefit for the continued preservation of the listed asset. Historic England's advice accepts that such benefits are material in the decision, provided harm is limited and replacements are carefully detailed.

Conclusion of the balancing exercise

On balance, and applying paragraph 215 of the NPPF, the harm arising from the replacement windows is less than substantial and of limited degree because the replacements have been carried out in timber, have been designed to retain the historic fenestration patterns and external joinery appearance, and do not introduce materially alien external forms. Those modest harms are outweighed by the demonstrable public benefits: improved thermal performance and energy efficiency, reduced risk of condensation and timber decay, increased durability and reduced future interventions, and securing the building's ongoing use and maintenance by its occupier. The works therefore meet the tests of paragraph 215 when weighed proportionately; this supports a recommendation that listed building consent be granted taking account of the mitigation and recording measures described below.

In light of the statutory duty, the NPPF balancing test and Historic England advice, and having regard to the submitted PL12 drawings which show timber framed replacement casement windows designed to match the traditional patterns and profiles of the building's fenestration, the replacement works amount to less than substantial harm to the Grade II listed building. That limited harm is outweighed by the public benefits of improved energy efficiency, reduced long-term decay risk, retention of timber joinery, and the practical benefit of securing the building's continued use and maintenance.

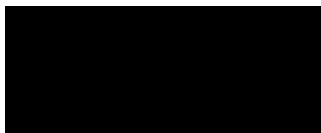
In light of the above brief comments there are not believed to be any reasons to resist the development as presented however if you have any questions to confirm your support, please do not hesitate to contact me direct.

Together with the duly completed application form, the enclosed application comprises the following details.

- Photo Sheets
- Drawing No. 25-040 v1 7 Park Street-PL10 PLANS
- Drawing No. 25-040 v1 7 Park Street-PL11 ELEV
- Drawing No. 25-040 v1 7 Park Street-PL12 WIN DETAILS

I hope the enclosed information and above comments are sufficient to ensure your early approval of my client's application,

Yours faithfully



Daniel Drayton
Associate

Cc Charlton Park Estate