

CASE OFFICER'S REPORT

Application Reference:	PL/2025/08179
Application Type:	Listed building consent (Alt/Ext)
Consultation ends:	13 February 2026
Case officer:	Fiona Webb

Site Address:	12 West End, Westbury, BA13 3JF
Proposal:	Replace the existing gloss white wooden windows which are beyond economical repair by substituting with upvc box sash windows on front elevation
Recommendation:	Refuse

Scope of comments: the following comments relate to the built historic environment.

Policy: From the point of view of the historic environment the main statutory tests are set out within the Planning (Listed Building and Conservation Areas) Act 1990. Section 16 requires that **special regard** be given to the desirability of preserving or enhancing listed buildings, their settings or any features of special architectural or historic interest which they possess.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 also requires the Council to pay **special attention** to the desirability of preserving or enhancing the character or appearance of designated Conservation Areas.

The NPPF outlines government policy, including its policy in respect of the historic environment. Section 16 of the NPPF 'Conserving and enhancing the historic environment' sets out the Government's high-level policies concerning heritage and sustainable development.

Paragraphs 213 – 215 of the NPPF require a balanced approach with any harm which would be caused being weighed against the potential public benefits which might be achieved.

Paragraph 210 requires local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and of new development making a positive contribution to local character and distinctiveness.

Paragraph 220 Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Areashould be treated as ...less than substantial harm under paragraph 215.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

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.

Historic England Advice Note 2 – Making changes to Heritage Assets illustrates the application of policies set out in the NPPF in determining applications for PP and LBC.

Historic England Guidance on Traditional Windows Their Care, Repair and Upgrade

Adapting Historic Buildings for Energy and Carbon Efficiency

Site and assets considered: The property is a Grade II listed building located in Westbury Conservation Area. The property also affects the setting of numerous other listed buildings in the locality.

Proposal: The proposal seeks to replace the existing gloss white wooden windows which are beyond economical repair by substituting with upvc box sash windows on front elevation (No.5 windows).

Relevant planning history: W/85/00439/LBC - Extension to dwelling (approved); W/82/01009/LBC - Alterations, extensions and part demolition in connection with existing cottage (approved); W/85/00438/FUL – Extension (approved); W/82/01008/HIS - Improvements and extensions (approved).

PL/2025/02529 and PL/2025/02804 - 15a High Street, Calne, Wiltshire SN11 0BS (refused and appeal dismissed).

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

Information considered/provided: Paragraph 207 requires that applicants describe the significance of any heritage assets affected, including any contribution made by their setting. This should include sufficient information to provide a clear understanding of the significance of the heritage asset and its setting and the potential impact of any proposals on that significance. In this case, whilst the application is accompanied by a “Design & Access Statement” the document provides limited information about the building and fails to provide any objective assessment of the fabric affected, its date or significance or of the impact of the proposals and, as a result, it fails to meet the requirements of the NPPF.

However, paragraph 208 also provides for the local planning authority to make its own assessment of impact and the following heritage recommendations are offered on this basis.

Significance of assets and contribution of setting: The NPPF defines significance as the “value of a heritage asset to this and future generations because of its heritage interest. The interest may be **archaeological, architectural, artistic** or **historic**. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” Historic England assesses significance in a similar manner, referring to evidential, historic, aesthetic and communal values of a place.

In this case the significance of the building lies largely with its historic fabric and architecture - its form, layout and architectural expression/detailing and use of materials

which have significant aesthetic and architectural interest and which contribute to the character of the conservation area.

The righthand side of the building has, however, been compromised by extension and alteration during the modern period and is of lesser interest.

Assessment: The property forms part of a list entry Nos 12 to 18 West End, Westbury. The properties are listed Grade II and were first listed on 31 March 1978. The listed entry states:

C17 renewed C18. 2 storeys. Rendered over a good deal of timber framing. No 12 with cement pilaster strips, band over ground floor and dressings. Nos 16 and 18 paired by projecting side strips and couplet doorways with raised surrounds. Tiled roofs with 3 ridge chimneys. Late C19 sash windows, 1 range each except No 14 which has extra window over doorway and a 2-light casement on 1st floor. Nos 12 and 18 have modern doors, Nos 14 and 16 have 6 (moulded) panel doors, No 14 with brackets to flat hood. No 12 has 'B' in cement key over door. Interior of No 16 very interesting for its spine and cross beam arrangement on ground floor. Oak with Tudor or early C17 mouldings.

The windows proposed to be replaced are a mix of different styles and periods from early 20th century timber horned sliding sash windows in a 2/2 pattern with a single vertical glazing bar and a and 1/1 pattern sash. The other windows to be replaced are a later 6 pane timber fixed light casement, a two-pane timber casement and a modern top opening timber window. All windows are on the front elevation of the building. The windows are a feature of the listed building making a positive contribution to the character and appearance of the conservation area (apart from the modern window in the righthand extension to the listed building).

The Conservation led approach as supported in Historic England guidance on the Care, Repair and Upgrade of traditional Windows seeks justification for replacement of significant windows. This normally requires a window schedule that identifies the significance of the window the condition of the window, works proposed and heritage impact on significance.

The application detail has no supporting justification to support the need for replacement of the windows.

There is no clear plan showing which windows are to be replaced. The specification details for the proposed replacement windows would not match the fenestration design of the existing

The proposed replacement window material is uPVC smooth white double glazed with spiral balances. The design and details including thickness of the frames and sashes and lack of detail on glazing bars are not a replication of the existing timber sliding sash windows with thin profiles and delicate glazing bars.

The Historic England guidance Traditional Windows Their Care, Repair and Upgrade page 62 advises:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.

Page 59 The replacement window should match the form, detailing and operation of the window to be copied. It will be necessary for the maker of the new window to accurately copy the profiles of all the window components including head, jambs and cill of the frame and the stiles rails and glazing bars of the sashes or casements. Old glass should be carefully salvaged and reused. Where practicable, ironmongery should be overhauled and reused. Normally for replacement sliding sash windows counterbalancing springs should not be used in as a substitute for pulleys and weights as this significantly alters the detailing and appearance of the window.

Page 6 and 7 of the guidance explains in detail why uPVC is not a suitable material for replacement windows:

The different appearance and character of PVC-u windows compared to historic windows is highly likely to make them unsuitable for older buildings, particularly those that are listed or in conservation areas. PVC-u is short for Poly Vinyl Chloride un-plasticised and these windows are assembled from factory-made components designed for rigidity, thermal performance and ease of production. Their design, detailing and operation make them look different to traditional windows. Manufacturers have been unable to replicate the sections/glazing bars used in most timber and steel windows due to the limited strength of the material and the additional weight of the secondary glazing units. False 'glazing bars' which are thin strips of plastic inserted within the glass sandwich of a double glazed unit change the character of the window.

Where a proposal to replace historic windows is based on a desire to improve thermal and acoustic performance, there are other means of securing such improvements such as secondary glazing or slimlite double glazing which may have less impact on the significance of the building.

The existing original horned timber sash windows are historic and have some significance, and no evidence has been provided that they are beyond repair. The replacement of all the windows is not justified and the uPVC replacement windows do not accord with the current Historic England advice on repair or replacement of traditional windows or in terms of improving thermal or acoustic performance without harm to significance.

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 will require a clear and convincing justification.

The existing timber windows in the front left hand side elevation have some age and make a positive contribution to the character and appearance of the conservation area and this group of listed buildings.

No evidence has been provided in the application to show if the existing windows are beyond repair. Their replacement is not justified, and the uPVC replacement windows do not accord with the current Historic England advice on repair, upgrade or replacement of traditional windows in respect their material, design and detailing or in terms of improving thermal or acoustic performance without harm to significance. The proposal is therefore harmful contrary to NPPF 213 and 215 and 220 and Wiltshire Council's Core Strategy Policy CP57 'Ensuring high quality design and place shaping' and 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."

CONSULTATION RESPONSES:

Westbury Town Council – At a meeting held on Monday 19th January 2026 Westbury Town Council Highways, Planning and Development Committee considered application PLO/2025/08179 and has the following response to make: No Objection pending Conservation Officer's satisfaction that the application concurs with guidelines for removal and restoration of windows in Conservation Area

REPRESENTATIONS:

1 response from Member of the Public - I believe the glass in these windows are the original (maybe Victorian) glass and has been turned down once before because of the history. this building is grade II listed and putting in the windows asked for by the applicant will totally spoil the look - therefore I am strongly objecting to this plan.

RECOMMENDATION:

Refusal

REASON FOR GRANTING PERMISSION/CONSENT/REFUSAL:

The proposal works would harm the character and significance of the listed building via the loss of historic fabric in the form of the front elevation windows. No objective justification has been provided that demonstrates that the windows are beyond their useful life or that the objectives for increasing thermal efficiency could not be achieved in an alternative way which avoids harm to the buildings' significance in line with the NPPF requirements. The harm, although less than substantial, is therefore not outweighed by any public benefits, including securing the heritage asset's optimum viable use. The proposal is contrary to Section 16(2) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; chapter 16 of the NPPF (paras 212, 213 and 215) and policy CP58 of the Wiltshire Core Strategy (Adopted January 2015).

Refusal Reason(s)

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1. WM13 - Information Considered:

Location Plan – dated 4/12/2025

Existing Site Plan - dated 4/12/2025

Existing/Proposed Elevations - dated 4/12/2025

[Window quote with sizes and specifications](#) – dated 6/01/2026