

Wiltshire Council Planning Consultation Response

23 February 2026

Jocelyn Sage
Senior Conservation Officer
Wiltshire Council Conservation
(South/West)

Officer's Name: Selina Parker-Miles
Officer's Title: Senior Planning Officer

Application No: PL/2026/00106 LBC and PL/2026/00566 PP
35-36 The Marsh, Longbridge Deverill, Warminster, BA12 7EA
Replacement of casement windows with double glazed hardwood windows to match existing. Replacement of chimney liner and increase in chimney height to meet current regulations.

Please find following comments in respect of the above application(s).

Recommendations:

	No comment
	Support in principle subject to amendments to the scheme (as set out below)
	Support subject to conditions (as set out below)
x	Object (for reasons set out below) to the proposals in respect of the windows
	No objections

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. Sections 16 (LBC) and 66 (PP) require 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.

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 214-16 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.

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."

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.

Site and assets considered:

35-36 The Marsh is a grade II listed building. The list entry reads as follows:

‘Detached cottage. Late C18. Brick main front on stone plinth, small squared rubble back and end walls, with some brick to stacks, thatched roof. Originally two small cottages, each with large fireplace to brick stack; low extensions added to each gable, that to left rendered and with tiled hipped roof. Two storeys, two-windowed, 2-light wood casements with glazing bars; an extra window to left of doorway which contains a plank door with peaked hood in slate on wooden brackets. At back similar fenestration, but two small single lights with glazing bars also to ground floor. Two small extensions at back possibly originally privies. Interior has two heavy bressumer fireplaces; one of beams reported to carry date 1794.’

The cottage is not in a conservation area.

Proposal:

Raising the height of two chimney stacks.

Replacement of casement windows (**19 in total**) with double glazed hardwood windows to match existing.



Issues: impact on the listed building

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, the applications are accompanied by a Design and Access Statement which includes a reference to the list description. 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, and in relation to this application, the interest of the building lies in its:

Appearance;

Plan form;

The rear single-storey historic extensions;

Use of traditional materials;

Of particular interest is the thatched roof, small pane timber windows etc.

Assessment:

Raising the height of the chimneys

The current chimneys appear to be brick with tall pots. It is likely that they have been rebuilt at various stages. The proposed additional brick courses will impact on the appearance of the listed building, however, the raising of the chimney heights is considered desirable to prevent thatch fires. As such, the works are considered necessary and expedient. No objection subject to a matching brick and a clay pot.

Windows

I am a conservation officer. I am looking to protect (conserve) historic fabric.

Historic England guidance seeks for windows **to be repaired where possible** (ie it is not just for organisations like the NT and English Heritage to repair windows, it covers ALL listed building), particularly where they are oldⁱ and may have old glass. Other means for improving the thermal efficiency of a building should be considered (ie secondary glazing would not require consent).

The current application proposes the replacement of 19 windows with no detailed justification ie that they are beyond ‘reasonable repair’ and indeed it is not credible that **all** the windows should all require replacing simultaneously because they are beyond repair.

Where are the windows?

Windows 1, 2 and 3 – front (south) elevation to the left

Windows 1 and 2 are likely to be modern ie they are within a modern extension. Window 3 looks to be within a historic side extension although I suspect the window is not historic. As such, the windows have no historic interest being modern and therefore I have no objection to them being replaced with slim d/g units subject to acceptable details.

Front (south) elevation of cottage.

An interesting mix of windows – 4,5,6 on the ground floor and 8,9 on the first. They are clearly within the historic core so potentially of historic interest. Only the ground floor 3 appear to have cills, the upper windows being almost flush with the elevation (a 17-18th century detail) and without cills. What is the justification for their replacement?

Window 7 is in a side extension. Don't know how old this is but window likely to be modern, therefore I have no objection to them being replaced with slim d/g units subject to acceptable details.

East elevation

Windows 10 and 11. Appear to be in a historic extension but the windows (at least window 10) is clearly a modern replacement, therefore I have no objection to them being replaced with slim d/g units subject to acceptable details.

Rear (north) elevation

They want to replace all the windows 12, 13, 14, 15, 17,18,19) on the historic rear elevation. They are of different sizes, none appear to have cills and are all flush with the elevation which suggests they could be historic. What is the justification for their replacement?

Rear elevation window 16

Clearly a modern extension to the listed building and therefore I have no objection to them being replaced with slim d/g units subject to acceptable details.

The window details

We do not have proposed elevation drawings of the windows.

The window details evidence a 4/10/4 unit whereas a slim d/g unit is generally 4/4/4 or 4/6/4.

It shows planted on glazing bars ie not proper run-through glazing bars.

The internal glazing bar has a 'standard' triangular profile. This is not a traditional detailing.

The section shows a cill. Not all of the windows have a cill and we would wish to protect this feature.

(Note: The applicant refers to the same detailing as per works to Sturgess Farmhouse ie from the D&A statement:

'The carpenter that will be constructing the windows recently made and installed heritage double glazed windows for another listed property in The Marsh (Sturgess Farmhouse).'

The application in question (PL/2022/00564) has window details which were approved that have proper run-through glazing bars, not as is currently being proposed.)

Summary & conclusion:

The NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's **conservation** (and the more important the asset, the greater the weight should be). It makes clear that any harm to a designated heritage asset requires clear and convincing justification.

In respect of the windows, Historic England window guidance: Traditional Windows: their care, repair and upgrading (published 8/2/2017) and Historic England Advice Note 18 (updated 16/2/2026) are pertinent.

Traditional Windows

Why preserve historic windows?

'Windows are the eyes of a building - they let in light and give views out - and profoundly affect its appearance. In addition, traditional windows bear witness to the artistic, social, economic and technological developments of past ages. Their design and detailing were influenced by contemporary architectural fashion, and reflected the status of a dwelling (and often the individual rooms within it). They were further shaped by factors such as methods of taxation, building legislation and craft advances, particularly in glass manufacture.'

*An assessment of the significance of a window or windows and the contribution they make to the overall significance of a building is the key first step in deciding the right course of action. **Surviving historic fenestration is an irreplaceable resource which should be conserved and repaired whenever possible.** The significance of a historic building, both as a whole and in terms of its constituent parts, can be assessed by considering its heritage values, using the framework set out in Conservation Principles (2008).'*

Chapter 6 Consents

'A small proportion of the country's building stock is listed and a relatively small proportion of historic windows survive within that stock. Historic windows are often of considerable importance to the significance of listed buildings. They can contribute to significance through their design, materials and workmanship. The strength of that contribution depends on a range of factors including the age, style and historic function of the particular building. Traditionally- produced glass is fragile and thus increasingly rare and where it survives it contributes to the significance of listed buildings. Historic windows on principal elevations will generally, but not always, make a greater contribution to the significance of the listed building than windows elsewhere'.

HEAN 18

Para 81. *'The 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.

Listed building consent is likely to be required, unless replacing panes in modern windows.

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

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

My assessment

Windows are important features of listed buildings and oftentimes retain historic fabric and detailing that contributes to their interest. The following windows are within the historic core of the listed building: 4,5,6,8,9,12,13,14,15,17,18,19. There is no assessment of their age, whether they have original joinery/ironmongery, historic glass, no reflection of the fact that some have cills whilst others don't. There is no assessment to say that the windows are beyond reasonable repair, nor whether only the sashes need to be replaced, rather than the whole frame. Nor indeed, whether only the sashes could be replaced the frames retained.

As such, I consider the proposals in respect of windows 4,5,6,8,9,12,13,14,15,17,18,19 will potentially result in the loss of historic fabric and detailing and as such will erode the significance of the listed building.

Whilst paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits, in this case no objective justification has been provided for the works and the proposals are articulated as being primarily for the convenience of the occupants i.e. a private benefit. As a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance.

I recommend that these windows are removed from the application and a separate listed building application is submitted if the applicant is minded to pursue this element.

In respect of the remaining windows, the existing details are inadequate. Elevations at 1:5 including sections (horizontal and vertical) should be supplied. Glazing bars should be proper run-through glazing bars and the glazing retained with a silicone seal (replicating a linseed putty).

In respect of raising the height of the chimneys, no objection subject to matching materials.

ⁱ The applicant claims the windows have all been replaced but provides no evidence