

APPLICATION FOR LISTED BUILDING CONSENT

OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/02333
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	Beaufort Mansions, 55-57 Stallard Street, Trowbridge, BA14 8GD
DESCRIPTION OF WORKS:	Replacement Timber Windows to Flats 5, 6, 10, 12, 20 and 21
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The site comprises a former warehouse and office block to Studley Mill which is now largely converted to flats. It is located at the edge of the commercial town centre of Trowbridge, just to the south of the River Biss and within the designated conservation area. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990. The list entry, for means of identification purposes only, provides the following description:

STALLARD STREET 1. 5411 (South East Side) Nos 55 to 57 (consec) (formerly listed as Nos 55 and 57) ST 8557 6/50A 16.10.74 II GV

2. Former office block and warehouse of Studley Mills. 1878 by local architect William Smith. Italianate. Ashlar. 4 storeys with corner pilasters and bands between each storey. 5 ranges of windows to street, 4 on ground floor in arched, heavily rusticated surrounds and a small shopfront. The 1st and 2nd floors have alternately paired arched, and large elliptically headed windows, all with keystones and connected by decorative bands at impost level. Single tripartite casements on top floor with raised cills. Hipped slate roof with bracketted eaves. The yard front is of 3 bays with similar treatment. The centre bay is set forward and has paired windows on 1st and 2nd floors.

Nos. 50 to 58 (consec), workshop at rear of No 58, entrance screen principal Factory and Handle House at Studley Mills form a group.

PROPOSAL

The application proposes the replacement of 9 windows within 6 flats.

RELEVANT PLANNING HISTORY

Proposal / Summary

W/07/00284/LBC Conversion to 20 flats, 2 ancillary offices and shop (Approve with conditions)

W/07/00262/FUL Conversion to 20 flats, 2 ancillary offices and shop (Approve with Conditions)

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Legislation

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 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.

National Policy and Guidance

The National Planning Policy Framework (NPPF) sets out government policy, including 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 to 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.

Section 14 of the NPPF addresses the challenge of climate change, flooding and coastal change. Paragraph 167 advises that "Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England's publication 'Traditional Windows – Their Care, Repair and Upgrading (2017)' encourages the retention of windows that contribute to the significance of listed buildings but sets also out their approach to the alteration/replacement of windows where this is acceptable in principle:

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.
2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings. When they do, they should therefore be retained and repaired where possible. If beyond repair they should be replaced with accurate copies.
3. Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without harming the significance of the listed building. There are compatibility issues to consider as the

introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.

4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.
5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency, provides advice in support of consistent decision making on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

Wiltshire Core Strategy:

Whilst not directly relevant to listed building consent applications, the below policies give an indication of the Council's approach to development affecting heritage assets:

- Core Policy 57 '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.
- Core Policy 58 '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."

ISSUES

Impact upon the preservation of the listed building and its features of special architectural and historic interest.

CONSULTATION RESPONSES

Trowbridge Town Council - No objection

REPRESENTATIONS

In accordance with the requirements of Section 5(1) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended) the application for listed building consent was publicised by way of:

- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and to allow a statutory consultation period of **21 days** for representations to be submitted.

No representations were received.

ASSESSMENT

In accordance with Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has been given to the significance of the listed building, including its architectural and historic interest, and the desirability of preserving both the building and its setting. Relevant policies within the National Planning Policy Framework (NPPF), particularly Section 16: Conserving and Enhancing the Historic Environment, have also been taken into account. These policies require that any harm to the significance of a designated heritage asset must be clearly justified and weighed against the public benefits of the proposal.

In order to be acceptable, the application needs to be assessed against the following criteria:

Information considered/submitted

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 application is accompanied by a Design, Access and Heritage Statement which describes the building and its significance and provides an appropriate level of information to allow understanding of the proposals and their impact.

Assessment of significance:

According to the National Planning Policy Framework (NPPF), significance is defined 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 further categorises significance into four key values:

- *Evidential* – the potential of the asset to yield evidence about past human activity.
- *Historic* – the ways in which the asset illustrates aspects of history.
- *Aesthetic* – the sensory and design qualities of the asset.
- *Communal* – the meanings and associations attached to the asset by people.

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 high-quality design materials which have significant aesthetic and architectural interest and which contribute to the character of the conservation area. The windows are of interest in so far as they contribute to the architectural

composition of the elevations. However, the majority of the current window joinery itself is modern and even where more historic elements appear to be retained, these have been significantly altered in an ad hoc manner to provide opening lights etc. The lack of consistency and some poor detailing detract from the overall coherence of the elevations. Many of the windows are in poor condition.

Impact of proposals on the significance and setting of the building/structure:

Understanding the impact of proposed works on a listed building requires a careful and proportionate assessment of how those changes affect the asset's heritage significance and its setting. This includes both the physical alterations to the building itself and any changes to its spatial or visual relationship with surrounding structures or spaces.

The significance of a heritage asset is not static; it is shaped by its architectural, historic, and communal values, and by how these are experienced in context. Therefore, any intervention must be considered in light of the asset's identified significance, with attention given to both potential harm and benefits. Benefits may include repairs that support the long-term conservation of the building, improved energy performance, or enhanced public access and understanding.

This assessment is grounded in the statutory duty under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires special regard to be given to the desirability of preserving the building and its features of special interest. It is also informed by national policy, particularly paragraphs 199–208 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The application proposes the replacement of 9 windows across 6 flats on the three upper floors. The current windows are modern, although they may retain some occasional historic elements. The fabric is of limited intrinsic interest and many of the windows are in poor repair and there is no objection in principle to their replacement. The proposed details largely reflect the existing windows but are consistent across each of the floors and will remove some of the current inconsistency. They feature traditional flush fixed lights and opening casements with narrow frames and genuine through glazing bars but incorporate slimline double-glazed units within the existing joinery profiles. The principles of the proposals comply with the guidance from Historic England quoted above in that the elements that contribute to the building's special interest will be replicated, whilst the energy efficiency of the building will be improved by the incorporation of double-glazed units, which can be accommodated without change to the joinery profiles. Public benefits will also stem from the investment in the repair of the building.

Impact on Ecology

While Sections 16 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 do not explicitly reference protected species, Local Planning Authorities have a statutory duty to consider potential impacts on protected species when determining applications. This responsibility arises from broader environmental legislation and national planning policy, and must be taken into account where relevant.

		Y / N / NA
(a)	Does the site or proposed development possess/impact on any of the features where protected species are likely to be present (assessed	N

	against Natural England's standing advice) and where species are likely to be found?	
(b)	If yes, has a protected species survey been submitted?	
(c)	If yes, does the survey show a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity in accordance with the standing advice?	

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.

As discussed above, the overall impact on the significance of the heritage asset resulting from the proposals will be largely neutral and those features which are of interest and which contribute to the significance of the building will be replicated. On this basis no specific justification is required however it is considered the works will assist in securing the future of the heritage asset in good condition in support of its long-term conservation. The requirements of current conservation legislation, policy or guidance are considered to be met.

Some minor final details remain to be secured and these can be achieved via the addition of a condition as set out below.

RECOMMENDATION:

That Listed Building Consent be GRANTED, subject to the following conditions:

Standard time scale

Plans List

Window Details

The replacement window hereby approved shall be constructed (and hereafter maintained):

- without visible trickle vents;
- with double glazing 'spacer bars' which are colour matched to the window;
- with puttied in glazing; and
- with a painted finish.

REASON: To preserve the special interest of the listed building and its appearance.