

APPLICATION FOR LISTED BUILDING CONSENT

OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/02506
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	Cradlebridge House, 140 Leigh Road, Westbury, BA13 3QR
DESCRIPTION OF WORKS:	Replacement of 4 windows and 1 door and fanlight in timber
RECOMMENDATION:	Refuse

SITE DESCRIPTION/CONTEXT

The application site comprises a two-storey brick house known as Cradlebridge House, which is a Grade II listed building, located within the settlement of Westbury. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The site is not within a Conservation Area but is in the wider setting of the Grade II Leighton House, a small county C18 house set within its own substantial grounds.

Built as a Parsonage in the C18, the building exhibits a polite, three bay main house, with a subservient wing with a pitched roof of mixed construction and retains features of special interest that contribute to its heritage significance.

The list entry, for means of identification purposes only, provides the following description:

C18. Formerly a parsonage. 2 storeys. Brick. Stone quoins. Moulded plinth and cornice. Stone parapet with coping. Slate roof. Garden front has 3 windows, 4 panes wide, sashes in moulded stone architraves and plain frieze extension up to cornice, on 1st floor. Formerly 2 similar windows on ground floor; now altered to French casements with wretched decorative top parts. 9-panel central door, top panels glazed, in plain stone surround, with flat moulded stone hood on cut stone brackets. 2 ranges of blind windows at rear. Central stair projection at back also with tall arched central window and saddlestone to gable, 6 panel door on ground level under flat hood on cut brackets at side. Lower 2 storey irregular service wing to west. Stone and brick built with pantile roof - front originally to north of brick dentil course over ground floor and to eaves; see also stonework, particularly quoining; of fine ledged and battened door with original wrought iron hinges and knocker; clearly older than present main block. Pitched herringbone brick paving to back court. Rustic gatepiers to road, gates have arrow head rails, dog rails and arch braces to top rails.

PROPOSAL

The proposal is for the replacement of 4 windows and 1 door and fanlight in timber.

RELEVANT PLANNING HISTORY

Proposal / Summary
PL/2026/02325 - Householder planning permission – Replacement of 4 windows and 1 door and fanlight in timber
16/04358/PREAPP - Pre-Application enquiry Decision - Pre-App Response Date: 10/6/2016 – 5 new dwellings

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 Advice Note 2: Making changes to Heritage Assets, illustrates the application of policies set out in the NPPF in determining applications for LBC (and planning permission).

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 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 or its setting or any features of special architectural and/or historic interest.

CONSULTATION RESPONSES

Westbury Town Council raised no objection to the proposed works.

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.

Below is a summary of the representations received during the consultation period. In accordance with the provisions of the *Planning (Listed Buildings and Conservation Areas) Act 1990*, only matters relevant to the consideration of the building's special architectural or historic interest have been taken into account in the assessment of this Listed Building Consent application.

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.

The submitted application had:

- drawings of the proposed replacement windows
- drawing of existing and proposed elevations
- Design, Access and Heritage Statement

The level of information submitted does not provide sufficient details of the existing windows and doors, or clear and convincing justification to support the replacement. Additional information and details were requested at an early stage of the application process, and some details were provided which were still considered to be inadequate. No further information was provided.

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.

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. Three of the windows appear to be original to the house and are formed of slender glazing bars and bottom rail. They provide a positive contribution to the significance of the building. The kitchen window has less significance as it appears to be a later replacement. The door is a simple door, styled to suit the position in the building (a rear, working door, rather than a formal entrance door).

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 proposal is for the replacement of 4 windows and 1 door with fanlight in timber. Three of the windows are to the first floor, the outer two are eight over eight sash windows with the central window being a six over six of the main dwelling (referred to as the Tower in the submitted application) and a tripartite casement window at ground floor in the subservient range. The

windows are single glazed and formed of timber. The sash windows have fine glazing bars and mid-rails with concealed boxes. The casement window is of traditional appearance with flush finish and a distinctive projecting detail, though has opening fanlights and casements at each end and a fixed centre light. This is likely to be a modern replacement window. The existing door is a main entrance door six panels, with fanlight above which has four rectangular windows formed of three slender glazing bars. The door has a small turn handle and letter box.

The submitted application provides scaled drawings of the existing windows or door to allow for an assessment of the details. Limited photographs of the sash windows have been provided which show that the bottom rail and the lower section of the frame have some localised damage, and that there is missing glazing, but fails to provide clear and convincing justification that the windows are beyond repair.

The submitted information provides details of the proposed replacements.

- 1. Bedroom – shows an eight over eight sash window with double glazed (24mm) windows with internal glazing bar (spacer) and applied glazing bars. The windows are to be ‘timber’ and coloured white.
- 2. Bedroom – shows an eight over eight sash window with double glazed (24mm) windows with internal glazing bar (spacer) and applied glazing bars. The windows are to be ‘timber’ and coloured white.
- 3. Ensuite – shows an six over six sash window with double glazed (24mm) windows with internal glazing bar (spacer) and applied glazing bars. The windows are to be ‘timber’ and coloured white.
- 4. Kitchen – shows a tripartite window in a similar style, but with trickle vent and the central fanlight opening. with double glazed (24mm) windows with internal glazing bar (spacer) and applied glazing bars. The windows are to be ‘timber’ and coloured white.
- 5. Fanlight – this is to be separate from the main door and formed with double glazed (24mm) windows with internal glazing bar (spacer) and applied glazing bars. The window are to be ‘timber’ and coloured white.
- Front entrance door – this is proposed to be four panel door with the upper two panels glazed with obscure glass (24mm double glazed units). The door is shown as a modern composite construction with modern handle and letter box but is described as timber on the drawing. As this is a composite door, it is proposed to be finished in Eucalyptus (RAL 6034). This door will require a new frame which no details have been provided.

Whilst the proposed replacement windows and door are noted as ‘timber’ there is no clarification if this is natural timber (oak, pine, softwood/ hardwood, etc) or an engineered timber. No details have been provided how the windows will be finished, whether this is a factory applied finish which creates a similar solid, mechanical finish which creates an appearance similar to a UPVc window, or if they will be hand painted or finished.

The submitted existing and proposed elevations drawing (1:100 Scale @ A3) show that the replacement kitchen window will add bulk to the existing frame, and the sash windows will have a similar appearance. It is not possible to consider the potential of the visual changes as no details of existing have been provided, and limited details of the proposed have been submitted.

Historic windows are an important characteristic of a building, and their loss often has a negative impact. There is an acknowledged benefit of reduced heat loss and acoustic improvement with the use of double-glazed windows, however, this could be formed by the installation of secondary glazing. This retains the historic fabric and offers a better heat loss and acoustic performance.

Aside from the frame, the contribution of the character and imperfections of historical glass adds to the appearance of the building. The separate windowpanes within the sash respond to the limitations of the glass manufacturer before the industrial developments in the 19th century, which allowed for an increase in the size of sheets (float glass) following the Great Exhibition in 1851. The individual panes create interest and break the mass of the glass. Within the application there is no confirmation if the historic glass remains. If it does, this adds to the significance of the windows.

No information has been provided on the ironmongery of the existing windows and doors. These small details add to the understanding of the windows, responding to technical changes in manufacturer, with early items often handmade by local craft people and can be as important as the scale and details of the window frames.

The proposed replacement door requires a separate door and fanlight which will increase the bulk of the frame. As with the sash windows, the door frame and glazing bars to the fixed light are slender. The proposed replacement door appears to be of composite material (drawings) and this is not acceptable. The appearance of the door is proposed to be changed, and no details for the proposed change have been provided. Whilst this is not the formal entrance door, doors were styled to suit the type of social hierarchy of the entrance and therefore are important to the significance of the building.

The Historic England guidance, as noted above provides extensive guidance on the significance of historic windows, their repairs and the proposed replacement. This guidance should be followed with any future application. Repair and the installation of secondary glazing is the preferred option to retain historic fabric. Where there is a proposed loss of historic fabric, there needs to be clear and convincing justification (as per the NPPF para. 213) that the windows are beyond repair, then a replacement window can be considered. The NPPF also clarifies that where there is evidence of deliberate neglect of, or damage to, a historic asset, that the deteriorated state of the heritage asset should not be taken into account in any decision (para. 209). This includes where there has been limited or no maintenance undertaken.

The proposed use of standard 24mm double glazed units is generally not supported in traditional sash windows as the weight and depth of the glazing requires an increase in the size of the frame. The existing timber frame and glazing bars are incredibly slender and therefore it is unlikely that this will be able to be replicated to support the increase in the glazing unit. An increase in frame size is considered to cause harm to the appearance of the building and therefore is not supported. Alternative solutions could be the use of a slim lite double-glazed unit, vacuum unit or a modern single glazed unit that has a laminate that improves thermal efficiency.

The submitted application states there are public benefits of installing the new windows for reduced heating costs and therefore reduce the burning of fossil fuel. This justification has been considered at appeal, and the Planning Inspector has considered that heating is a personal and not a public benefit, but there are alternative methods to reduce heat loss that protects the historic

environment, as discussed in the Historic England guidance. In addition, the presumed thermal efficiency of windows within historic and traditional buildings is limited due to the nature of the construction, and therefore, any consideration of energy efficiency should be holistic to the whole building and not limited to individual aspects only. As Historic England state:

The amount of heat lost through windows may be a relatively small proportion of the total building, depending on the number, size and condition of the windows. Therefore, improvements beyond repair and draught sealing may not be cost effective in either financial or carbon terms. This underlines the importance of adopting a whole building approach.

The submitted application provides no information if other alternatives or options have been considered, or if this application forms part of a wider consideration of energy efficiency improvements.

The submitted information does not provide sufficient information to describe the significance of the windows or the provide clear and convincing justification. The Planning (Listed Buildings and Conservation Areas) Act 1990, Section 10 Making of applications for listed building consent stipulates the information required as part of the application process to gain Listed Building Consent:

(2) Such an application shall contain:

- (a) sufficient particulars to identify the building to which it relates, including a plan;*
- (b) such other plans and drawings as are necessary to describe the works which are the subject of the application; and*
- (c) such other particulars as may be required by the authority.*

(4) The regulations must require that an application for listed building consent of such description as is prescribed must be accompanied by such of the following as is prescribed—

- (a) a statement about the design principles and concepts that have been applied to the works;*
- (b) a statement about how issues relating to access to the building have been dealt with.*

(5) The form and content of a statement mentioned in subsection (4) is such as is prescribed.

This information has not been provided either as part of the submission or following additional requests. The NPPF requires 'great weight' for the protection of designated heritage assets (para.212) and that 'clear and convincing justification' should be provided for 'any harm, or loss of, the significance of a designated heritage asset (para. 213) and it considered that this has not been provided as part of the application or appeal.

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
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(a)	Does the site or proposed development possess/impact on any of the features where protected species are likely to be present (assessed against Natural England's standing advice) and where species are likely to be found?	N
(b)	If yes, has a protected species survey been submitted?	NA
(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?	NA

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 this case, the proposals will result in harm to the building via the loss of historic fabric and the installation of inappropriate windows and doors. The proposals involve only part of the building/setting and could therefore be considered as causing 'less than substantial harm' for the purposes of interpreting the NPPF, but they involve the loss of important historic fabric and should not be seen as being of lesser consequence. Indeed, the wording of the NPPF and the 'special regard' by Sections 16 of the Act requires that any level harm caused should be taken seriously.

Paragraph 215 allows that a level of harm may be offset by public benefits, which could include conservation benefits. In this case, however, no/insufficient objective justification has been provided to demonstrate that the benefits which will result from the works will outweigh the harm caused and, as a result, the proposals fail to meet with the requirements of current conservation legislation, policy or guidance.

RECOMMENDATION:

That Listed Building Consent be REFUSED for the following reasons:

The proposal would involve the removal of a number of historic and traditional timber windows and door, causing a loss of significance. The proposed replacements feature a number of untraditional details and would have further adverse impact on the significance, character and appearance of the listed building. It is considered that clear and convincing justification for the work has not been provided, nor significant public benefits that would outweigh the harm. The proposal would fail to preserve or enhance the existing character and appearance of the heritage asset sections 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and NPPF (2024) paragraphs 212, 213 & 215.