

## Wiltshire Council Planning Consultation Response

**Application No:** PL/2026/02277 (LBC) & PL/2026/03289 (PP)  
**Address:** No.18 St George's Court, Semington  
**Case Officer:** Nina Parker-Miles

Please find following comments in respect of the above consultation:

### Recommendations:

|                                     |                                                      |
|-------------------------------------|------------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                           |
| <input type="checkbox"/>            | Comment                                              |
| <input type="checkbox"/>            | Support                                              |
| <input type="checkbox"/>            | Support subject to conditions (please set out below) |
| <input checked="" type="checkbox"/> | Object (for reasons set out below)                   |
| <input type="checkbox"/>            | No objections                                        |

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

### **Site:**

No.18 St George's Court is part of the grade II listed complex of buildings, which were originally built and used as a workhouse, dating from the latter half of the 19th century. It later became a hospital, although it was converted into dwellings in the early 2000s after approved and renewed permissions since 1989.

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

*Work house, now hospital for people with learning disabilities. 1836-1838 for Melksham Union, by H.E. Kendall. Limestone ashlar front, dressed limestone to rear ranges, Welsh slate roofs with brick stacks. Classical front range with four rear ranges arranged in a cross. Three-storey, nine-window front. Central three bays break forward with pediment, central 6-panelled door with pediment on corbels, aluminium windows replacing sashes with keystone and plain architrave either side and three windows to side bays. First floor has nine windows with keystones, second floor has nine with corbelled sills and no keys, corbelled eaves and pediment. Single-storey flanking wings with aluminium windows. Rear of main range has aluminium windows. Three-storey wing attached to centre rear of main range and running back to octagonal three-storey block at axis of cross; three-storey, nine-bay ranges run parallel to front range and a two-storey nine-bay range continues to rear, shorter two-storey or single-storey wings attached to ends of main ranges. All rear ranges have sashes or fixed windows with glazing bars, cast iron rainwater goods.*

*Interior altered, but retains some original joinery, staircases. Built as a workhouse*

*under the 1835 Poor Law Act for the Melksham Workhouse Union; original layout unaltered - front range contained boys' and girls' schoolrooms, board room in centre part, rear wings and yards for accommodation of men and women in separate blocks, kitchen and dining areas in central wing to rear. Single-storey buildings contained workshops stables and low building on east side contained cells for vagrants.*

### **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.

### **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.
- 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:
- 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 or its setting or any features of special architectural and/or historic interest.

## **Assessment**

Firstly, the submitted plans do not clearly identify which windows on the north elevation of the West wing – this should be made explicit on the application to clearly identify the affected windows, and therefore those subject to the application.

It is important with a building such as this that detailing, such as the joinery, remains consistent, so that architectural harmony is respected and uniform treatment will ensure the preservation of its visual qualities across the whole building. Incremental changes to ad-hoc windows, done in different glazing patterns, type of glazing, detailing etc, will weaken these otherwise strong aesthetics.

It is noted that these windows are believed to have been installed some years ago, prior to the building's conversion, and therefore the existing window situation has not replaced historic fabric.

Whilst no joinery details have been provided to confirm the construction of the windows, the supporting information states that 'false spacing bars' have been used – this means that the double glazing is one whole pane, visually subdivided with 'spacers' and then false glazing bars 'applied' i.e. stuck on, to the surface of the glass: this is inferior detailing and should not be approved. Historic England's guidance on replacement windows that is pertinent here, states that "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".

This is also an Enforcement case, as the works have already been done, and therefore unauthorised. When a retrospective application is submitted, the Council must assess the works in the exact same way as if the alterations had not yet taken place i.e. just because the works have been done, and an application made to regularise the situation, the Council is not duty-bound to simply approve the application to regularise the windows.

Whilst it is acknowledged that the building is a relatively modern conversion, which included the replacement of the windows, the high aesthetic qualities of the elevations contribute to the building's significance, and whilst the inclusion of slim double glazing may be acceptable in principle, the joinery detailing should still be traditionally constructed and therefore have 'true' glazing bars. As a result, the inferior joinery detailing is considered to dilute the strong visual

architectural qualities of the listed building, causing a degree of harm. This harm is not outweighed by public benefits, and the use of double glazing could be achieved with correctly detailed and constructed joinery.

Therefore this application should be refused. Whilst there are no precedents in planning, if approved, it could become difficult to resist all other windows within the building being altered in this fashion, and the wider implications need to be considered: this case, whilst relating to one 'flat' should not be taken in isolation, due to the very nature of the building being listed as a whole.

Pippa Card  
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Wiltshire Council Planning

Date: 18/06/2026