

## APPLICATION FOR LISTED BUILDING CONSENT OFFICER DELGATED REPORT

|                               |                                                                                          |
|-------------------------------|------------------------------------------------------------------------------------------|
| <b>APPLICATION REFERENCE:</b> | PL/2026/03066                                                                            |
| <b>APPLICATION TYPE:</b>      | Listed building consent (Alt/Ext)                                                        |
| <b>SITE ADDRESS:</b>          | 24 High Street, Warminster, BA12 9AF                                                     |
| <b>DESCRIPTION OF WORKS:</b>  | Replace 4No. wooden sash windows with new UPVC sash windows first floor and second floor |
| <b>RECOMMENDATION:</b>        | <b>Refuse</b>                                                                            |

### SITE DESCRIPTION/CONTEXT

24 High Street is listed together with 26 High Street, at grade II (31 March 1978). The list description, a means to identify the building, reads as follows:

*Early C19 corner block to the Close. 3 storeys over basement, red brick, No 26 stuccoed with painted ground floor. Corners to south-east and north-east chamfered. Brick flat arches to glazing bar sash windows, blind to south-east corner, stone cill bands. No 24 has one range of windows each face, No 26 has 2 ranges of windows. No 24 has round headed entrance with moulded surround on south-east corner. Mid C19 shop window surround with reeded pilasters to right (now modern plate glass) and C20 shop window to left. No 26 has round headed yard entry to left, mid C19 shop front to right with panelled pilasters (now with applied urns over) to fascia and central entrance. Rear altered but retains small arrow head railings on curve to the Close.*

24 High Street occupies a prominent position at the intersection of two roads (High Street and The Close). By virtue of its siting on a peninsula, its southern, eastern and northern elevations are visually prominent. Its eastern forms the party wall with number 26. It is close to the Atheneum, a prominent civic building.





There are many listed buildings in the vicinity, including number 26 to which it is attached.

It is within the Warminster conservation area.

## **PROPOSAL**

The application is for the replacement of 4 windows (sashes and boxes) on the southern and eastern elevations at first and second floor.

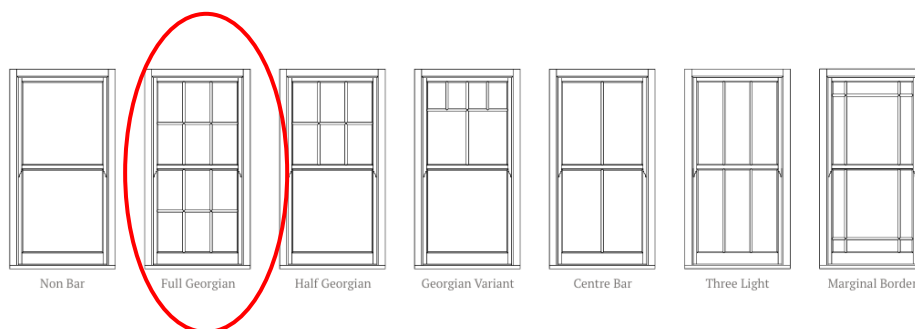


The proposed replacement windows would be PVCu from Masterframe's *Bygone Collection* (style Harmony). A technical pack has been supplied as part of the supporting documentation.

The technical pack confirms the following (amongst other details): 'Torso' balanced springs; 24mm argon filled double-glazed unit; slim (39mm mid-rail), continuous run through sash horns; white woodgrain foil finish.

## TYPICAL STYLES

**masterframe®**  
SASH WINDOWS



Note: my annotation based on the proposed elevations – see following



A proposed elevation at a scale of 1:10 has been supplied by the owner – note no ‘horns’ shown.

## RELEVANT PLANNING HISTORY

| Proposal / Summary                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| W/86/00732/FUL - Full planning permission Decision - Approved Date: 22/7/1986 – Change of use to offices                                                                                                   |
| W/83/00191/FUL - Full planning permission Decision - Approve with Conditions Date: 8/5/1984 – Extension to shop with flat over                                                                             |
| W/83/00250/LBC - Listed building consent Decision - Approved Date: 8/5/1983 – Extension to shop with flat above                                                                                            |
| 19/06183/LBC 26 High Street – Replacement windows to upper floors of front elevation                                                                                                                       |
| PL/2026/03066 - Listed building consent (Alt/Ext) – Replace 4No. wooden sash windows with new UPVC sash windows first floor and second floor                                                               |
| W/10/00152/ENF_L - unauthorised signage attached to railings - 24A High Street, Warminster, Wiltshire, BA12 9AF – Replace 4No. wooden sash windows with new UPVC sash windows first floor and second floor |

## RELEVANT LEGISLATION, POLICIES AND GUIDANCE

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 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. The impact of the proposals on the Warminster Conservation Area.

## **CONSULTATION RESPONSES**

Warminster 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.

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.

No comments 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.

The application is supported by a Design and Heritage statement provided by the agent. It does not assess the interest of the windows affected, nor does it assess the condition of the windows and provides no analysis of the quality of the glass. As such, it does not meet the replacement of paragraph 207 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.

### 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, in so far as it relates to its external appearance, lies largely with:

- Its prominent location on a peninsula such that three elevations are publicly visible;
- That it is constructed in a red brick in Flemish bond;
- The form of the roof (reflecting the footprint of the building) and the use of Welsh slates;
- The large chimney stack shared with number 26;
- The small pane (6 over 6) timber Georgian windows with narrow glazing bars and a very slim meeting rail;
- The two blind windows above the shop door;
- That the ground floor is commercial – contributing to the economic vibrancy of the area;
- The ‘ghosted’ painted advertising band between the first and second floors.

#### 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 212-221 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

Historic England’s ‘Traditional Windows Their Care, Repair and Upgrading’ (2017) advises that *‘the loss of traditional windows from our older buildings poses one of the major threats to our heritage. Traditional windows and their glazing also make an important contribution to the significance of historic areas. They are an integral part of the design of older buildings and can be important artefacts in their own right, often made with great skill and ingenuity with materials of a higher quality than are generally available today. The distinctive appearance of historic hand-made glass is not easily imitated in modern glazing.’*

The application documentation has not evidenced that the windows are beyond repair. The justification for their replacement, as noted in the Design and Heritage statement, is that there will be '*almost no future maintenance*' and that they will be '*more user friendly*'.

The proposed replacement windows would result in the removal of the entire window (sash and boxes) resulting in the loss of historic fabric. The replacement windows would be PVCu ie a non-traditional material with a different character to timber. They would require a spiral balance system resulting in the loss of the traditional lead weight pulley system. The sashes would be a single-pane of glass with applied glazing bars rather than traditional run-through bars, as such, if there is any characterful glass surviving, it could not be used in the new windows and the new windows would lack the animation and reflective qualities of a multi-paned window.

In conclusion, the loss of historic fabric such as window frames, boxes and possibly glazing will therefore inevitably cause harm to the significance of the listed building. The replacement windows would not replicate the traditional detailing of a timber sash window and would introduce details which do not reflect the detailing or character of the existing windows which are considered to make a strong positive contribution to the character and appearance of the listed building.

### Addendum

The application documentation refers to 26 High Street Warminster (the neighbouring property) which has recently (2019) had installed the range of PVCu windows now proposed. In the case of number 26, the previous windows were modern 20<sup>th</sup> century replacements of an inappropriate design. Furthermore the sash boxes and alcove had been removed. In that case (and in view of the fact that the windows were above ground level) it was considered that a high-quality PVCu system represented an improvement over the 'existing' situation.



Number 26 High Street – 2018 and 2024 (google streetview)

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### 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 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?                                                                                                                                                                                            |            |
| (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

**That Listed Building Consent be REFUSED for the following reasons:**

In this case, the proposals would involve the removal of four complete historic and traditional timber sash windows, causing a loss of significance through the removal of historic fabric which makes a positive contribution to the special architectural and historic interest of the listed building. The proposed replacement windows, by virtue of their PVCu construction and non-traditional detailing, would further erode the building's special architectural and historic interest and have an adverse impact on its character and appearance. The application has failed to demonstrate that the existing historic windows are beyond reasonable repair or otherwise provide clear and convincing justification for their replacement. No public benefits have been identified that would outweigh the less than substantial harm arising from the loss of significance. The proposals are therefore contrary to Sections 16 and 72 of the Planning (Listed Buildings and Conservation Area) Act 1990, paragraphs 212, 213 and 215 of the NPPF and core policy 58.

The decision is based on the following plans/information submitted in support of the application:

Existing elevations scale 1:100 Drawing number 1

Proposed elevations scale 1:100 Drawing number 2

Proposed window elevation scale 1:10 Drawing number 3

Proposed vertical section scale 1:2 Drawing number 4

Proposed horizontal section scale 1:2 Drawing number 5

Technical pack Bygone Collection Harmony Masterframe Sash windows – uploaded 2 June 2026

