

Wiltshire Council Planning Consultation Response

11th August 2026

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Principal Conservation Officer
Wiltshire Council Conservation (Central)

Officer's Name: Andrew Thomas
Officer's Title: Planning Officer

Application No: PL/2026/04026
Replace front elevation windows in upvc
18 Stallard Street, Trowbridge

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)
☒	Object (for reasons set out below)
☐	No objections

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

National Policy 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 66 requires that **special regard** be given to the desirability of preserving the settings of listed buildings in so far as this contributes to their special architectural or historic interest.

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.

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 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 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.

Historic England's guidance publication "Traditional Windows - Their Care, Repair and Upgrading" provides detailed guidance on historic windows.

Local Policy: 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." It is also required that distinctive

elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced.

The Council's Core Strategy CP 57: Ensuring high quality design requires a high quality of design in all new developments. Proposals are required to "demonstrate how the proposal will make a positive contribution to the character of Wiltshire through (amongst other things) "enhancing local distinctiveness by responding to the value of the natural and historic environment, relating positively to its landscape setting and the existing pattern of development" and "responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting."

Proposal: the application proposes the replacement of the existing front elevation windows and door, including the ground floor bay windows, and first floor windows (all sashes) the front door and fanlight over, in Upvc.

Relevant planning history: the application is made in connection with recently granted approvals for conversion to flats.

Issues: impact on the setting of neighbouring listed buildings, impact on the conservation area.

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, whilst the applications are accompanied by a "Design and Access Statement" and this acknowledges the conservation area location, the document provides limited information about the building or windows and fails to provide any detailed information about the replacements or to explain how the heritage significance of the building and its surroundings will be maintained. 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 (as appropriate): 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, although the building is unlisted (presumably because of previous levels of alteration to the interior and rear) it is of early C19 origin and the front elevation reflects the character and features of other, often listed, buildings in the area i.e. an ashlar frontage of regular classical proportions with a pitched roof behind a parapet and traditional historic timber sash windows. The latter are multi-paned to the first floor and plate glass to the ground floor within bays to either side of the central door. The front door is modern and of poor design which could benefit from replacement to a different detail. The significance of the building lies largely with the remaining historic fabric and architecture of the front elevation which has significant aesthetic and architectural interest and which contribute to the character of the conservation area and to the setting of nearby listed buildings including the Stallards Public House and Church of the Holy Trinity.

Assessment: the proposals are for the replacement of the front elevation windows and doors with uPVC fittings of similar design (with the exception of the door which shows a 6 panelled and glazed design). No evidence is provided to demonstrate that the existing windows are beyond repair and no details of the proposed fittings are included.

The historic fenestration forms an integral part of the design of the building and contributes to a building's visual interest and to the contribution that it makes to the character and appearance of the area. In this case the windows to be replaced are historic and are traditional timber sliding sash windows. Whilst the desire for

more thermally efficient fittings is understood, there are other, more appropriate ways that this could be achieved without the loss of the windows. Or, if the windows can be shown to be beyond repair, via the specification of more appropriate replacement fittings.

No information has been provided with regard to the proposed fittings but Historic England's Guidance notes that "The different appearance and character of PVC-u windows compared to historic windows is highly likely to make them unsuitable for older buildings, particularly those that are listed or in conservation areas. PVC-u is short for *Poly Vinyl Chloride un-plasticised* and these windows are assembled from factory-made components designed for rigidity, thermal performance and ease of production. Their design, detailing and operation make them look different to traditional windows. Manufacturers have been unable to replicate the sections/glazing bars used in most timber and steel windows due to the limited strength of the material and the additional weight of the secondary glazing units. False 'glazing bars' which are thin strips of plastic inserted within the glass sandwich of a double-glazed unit change the character of the window." In the absence of details, it is not demonstrated that the proposed new windows will preserve the character of the building such that it can continue to make its current positive contribution to the setting of the nearby listed buildings and to the character and appearance of the conservation area.

It is also the case that the manufacture of uPVC windows and the fact that they are generally incapable of repair makes them an unsustainable solution when compared to timber and steel.

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.

The loss of the traditional timber sash windows from this historic, albeit unlisted, building will result in harm, both to the host building itself, the setting of neighbouring listed buildings and the conservation area. No details have been provided to demonstrate that the detailed appearance of the proposed replacement windows will be appropriate or maintain its significance and whilst there may be some benefit in terms of increases in thermal efficiency, this could equally be achieved by the upgrading of the existing windows or their replacement with more appropriate units to match the slender historic details in timber, aluminium or steel.

The proposals are in conflict with Sections 66 and 72 of the Act, paragraph 215 of the NPPF and Core Policies 57 and 58 and I therefore object to the application.