

Wiltshire Council Planning Consultation Response

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Application No: PL/2026/04130
**Replace 92 timber windows on the front elevation with Heritage Flush uPVC windows
10 Wicker Hill Trowbridge**

Please find following comments in respect of the above application(s).

Recommendations:

☒	Potentially support in principle subject to additional details being provided
☐	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 (PP) 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.

The NPPF (August 2026) sets out Government planning policy for England. Chapter 20, *Conserving and enhancing the historic environment*, recognises heritage assets as an irreplaceable resource. Heritage assets should be conserved in a manner appropriate to their significance, with harm avoided unless there is a clear and convincing justification. Decision-makers are required to apply a balanced approach, giving substantial weight to the conservation of heritage assets and weighing any harm to significance against the public benefits of the proposal.

National Planning Practice Guidance provides guidance on interpreting the NPPF.

Historic England's Conservation Principles, Policies and Guidance (2008) provides policy and guidance for the "sustainable management of the historic environment". Additional guidance on the application of policies set out in the NPPF is contained within their publications:

- Historic Environment Good Practice Planning Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (2015)

- Historic Environment Good Practice Planning Advice Note 3 – The Setting of Heritage Assets 2nd edition (2017)
- Historic England Advice Note 2 – Making changes to Heritage Assets (2025)
- Traditional Windows: their care, repair and upgrading (2017)

Local Policy: The Council's Core Strategy Policy CP58 'Ensuring the conservation of the historic environment' requires 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 replacement of windows on the front elevation in uPVC.

Relevant planning history:

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

Information considered/provided: Policy HE5 of the NPPF requires applicants to assess the significance of any heritage assets affected by a proposal, including the contribution made by their setting, and to identify the likely effects of the development on that significance. Sufficient information should be provided to enable a clear understanding of the significance of the heritage asset and its setting, and the impact of the proposal upon it.

Decision-makers must be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals. In this case, no supporting information has been provided and the application fails to meet the requirements of the NPPF. However, the following heritage recommendations are made on the basis of the local planning authority's own assessment of the significance of the heritage asset and the impact of the proposals.

Significance of assets and contribution of setting: 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 the existing building dates from the early twentieth century and is well designed in high quality materials and architectural style to reflect the high quality ashlar buildings in the immediate area. The building has considerable townscape presence and should be considered as a heritage asset which contributes positively to the character and appearance of the area. The site lies within the town centre at the heart of the conservation area and within the setting of a number of listed buildings, including some which are highly graded. The building replaced a mixed terrace of earlier buildings and was constructed as the offices for the Pioneer Benefit Society, and reflects the investment in commercial premises and civic pride of the era. The building is located on the edge of an area which includes a number of very high-status houses built during the C18 for the wealthy mill owners of the town.



Assessment: The existing windows are single pane timber casements, set within stone mullioned surrounds. The timber frames are of limited intrinsic historic interest and their key value lies with the uniformity across the elevation, and the relatively narrow sections of the frames which limits their visual impact within the architecture of the whole. Whilst they are noted as being beyond economic repair, no evidence have been provided in support of this although it is noted that in other residential buildings, such replacement would be permitted development and it would be difficult to sustain an objection in principle on these grounds.

The details provide only a generic brochure for the proposed “Deceuninck” window range. No specific details have been provided and the brochure does not include any examples which are equivalent to the stone mullion windows in the building in question.

Historic England’s Guidance (Traditional Windows: their care, repair and upgrading (2017)) 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.”

In the absence of detailed information, it has not been demonstrated that the proposed replacement windows would preserve the character of the building and enable it to continue making its positive contribution to the setting of nearby listed buildings and to the character and appearance of the conservation area. In particular, there is insufficient evidence to show that the window frame members would be sufficiently slender for this type of opening and surround. If the frames appear overly bulky their repetition across the building could result in a clumsy appearance that would detract from its architectural character. It is also unclear whether the proposed opening lights would maintain the balanced proportions and appearance of the existing fenestration. Furthermore, no details have been provided regarding the appearance of the proposed trickle vents - given the relatively small size of the window openings these could appear visually intrusive.

Summary & conclusion: The NPPF confirms that substantial weight should be given to the conservation of heritage assets (in this case including the non-designated host building, nearby listed buildings and the

conservation area) and makes clear that any harm to designated heritage assets will be a matter of considerable importance and weight which requires clear and convincing justification.

Specifically relevant are:

HE7: Decisions on non-designated heritage assets

1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported.
2. Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset

HE9: Conservation areas

1. Development proposals within or affecting the significance of conservation areas should:
 - a. Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and
 - b. Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development

Whilst there is no objection in principle to the replacement of the windows, insufficient specific detail has been provided to allow the Council to make the assessments set out above and be confident that they will be fulfilling their statutory duties to preserve the character and appearance of the conservation area and setting of nearby listed buildings. I would suggest that more details information regarding the proposed installation be sought and, in the event that the proposed uPVC fittings are incapable of replicating the unobtrusive appearance of the current windows, alternatives should be sought, which could be timber or possibly metal (including steel or aluminium).