

APPLICATION FOR LISTED BUILDING CONSENT

OFFICER DELGATED REPORT

APPLICATION REFERENCE:	PL/2026/01244
APPLICATION TYPE:	Listed building consent (Alt/Ext)
SITE ADDRESS:	43 - 45 London Road, Chippenham, SN15 3AJ
DEVELOPMENT DESCRIPTION:	Replacement of three windows - Front elevation, 1st Floor LHS; RHS Gable & Rear elevation, 1st floor RHS.
RECOMMENDATION:	Approve with Conditions

SITE DESCRIPTION/CONTEXT

The application site comprises of a two-storey rubble stone-built house known as Albert Cottage (43-45 London Road), which is a Grade II listed building, located within the settlement of Chippenham. The building is designated for its special architectural and/or historic interest under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The site lies within Chippenham Conservation Area, and within the setting of 47-49 London Road and 9 London Road (both Grade II listed buildings). The property is within the wider setting of 2-12 London Road, Number 1 and attached wall to the left and 87-105 London Road.

The building exhibits coursed squared limestone rubble walls under a slate roof and stone slate roof, with timber sash windows (of mixed types), some set into stone mullioned windows, and retains features of special interest that contribute to its heritage significance. This application focuses on three windows, which were subject of replacement in the 1990s.

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

Nos.43 AND 45 Albert Cottages and attached wall and gate piers (Formerly Listed as: LONDON ROAD Nos.43 AND 45)

House, now 2 dwellings. Mid C18 (before 1784) with early C19 (before 1831) wings to the London Road front (north). Coursed squared limestone rubble with dressed quoins, half-hipped stone slate roof with 2 stone lateral stacks to the north of the main block, painted ashlar and render to the later wings, that to the left with a stone slate roof, that to the right with double-Roman tiles. EXTERIOR: 2 storeys; symmetrical 3-window range to the original south front which has 2- and 3-light stone-mullioned windows to the 1st floor. The north front has an 8/8-pane sash window and 4-panel door to the right wing and a 10/10-pane sash over paired 6/6-pane sashes to the ground-floor left. INTERIOR: not inspected. SUBSIDIARY FEATURES: the north garden is enclosed by an approx 2m high rubblestone wall attached to the left extending forward for approx 10m to the street. The similar wall to the right is partly demolished but the front wall sweeps boldly down on both sides to central ashlar gate piers with pyramidal tops which flank steps to the house. They are inscribed "Albert Cottages"

PROPOSAL

The initial application was for the replacement of all the windows and doors to the property, altering the sash windows within the stone mullions (front and rear elevations) to timber casement. The application has been amended to focus of three windows which have failed and are now considered to be a safety risk. These windows are the top right-hand window to the front elevation (No.9) and the two gable windows serving the attic space (No.14 & 15).

RELEVANT PLANNING HISTORY

Proposal / Summary
N/91/00403/FUL - Full planning permission Decision - Approved Date: 10/10/1991 – ALTERATIONS AND PART REBUILDING TO FORM SINGLE DWELLING
N/91/00404/LBC - Listed building consent Decision - Approved Date: 10/10/1991 – ALTERATIONS AND REBUILDING TO LISTED BUILDING
19/07295/FUL - Full planning permission Decision - Approve with Conditions Date: 15/11/2019 – Proposed car parking area on part of garden and the reinstatement of the boundary wall
19/07324/LBC - Listed building consent Decision - Approve with Conditions Date: 15/11/2019 – Proposed car parking area on part of garden and the reinstatement of the boundary wall
PL/2025/08126 - Listed building consent (Alt/Ext) Decision - Approve with Conditions Date: 13/4/2026 – Repair and rebuild the left hand side of the frontage of the boundary wall

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) August 2026 sets out government policy, including in respect of the historic environment.

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.

Chapter 5 of the NPPF sets out policies for *Meeting the challenge of climate change* and gives substantial weight to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the 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'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)
- Historic England *Advice Note 18 – Adapting Historic Buildings for Energy and Carbon Efficiency* (2026)
- *Traditional Windows: their care, repair and upgrading* (2017)

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.

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.

CONSULTATION RESPONSES

Chippenham Town Council provided comments for the original submitted scheme (full replacement of windows & doors) and raised no objection, subject to the consideration of the Conservation Officer.

No other responses were received.

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.

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 20: *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

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, the application was submitted with a Heritage Statement. This provided a slightly conflicting assessment, noting that the replacement was 'like for like', rather than considering the proposed replacement with a casement window.

The following heritage recommendations are therefore 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.

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 the vernacular construction of the rubble-stone walls and the remaining stone mullioned windows, and the later, modern 'polite' extension which has timber sash windows. The combination of architectural styles shows the development of the property, which adds to the significance of the building. It appears that the existing windows within the stone mullioned windows are poor, modern replacements and considered to have limited significance.

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 policies HE4-9 of the National Planning Policy Framework (NPPF), and relevant local heritage policies and guidance.

The building underwent major works following the 1991 consents, which included works to the windows. Within the case notes it is evident that there was discussion on the windows, and the extent of the proposed replacements. Historic windows were generally formed with finer grained timber which offered a higher quality product; however, the timbers used in the late C20 were often larger grained, and therefore were lower quality timber, and more susceptible to wet rot.



Existing & Proposed consented elevation drawing (91/00404/LBC)

The existing design of the sash windows places the ends of the timber directly onto the stonework of the stone surrounds, and therefore the weather detail is poor as this encourages the water to sit on the stone sill for a short while, and due to the open grain pattern, capillary action encourages the water to the base of the window frame and therefore creates the correct environment to cause wet rot to the bottom of the frame. This detail could have been amended by sealing the end of the timber (paint, lead work, etc.). However, due to the timber quality and the design, this has caused modern replacement windows to fail.

Window 9



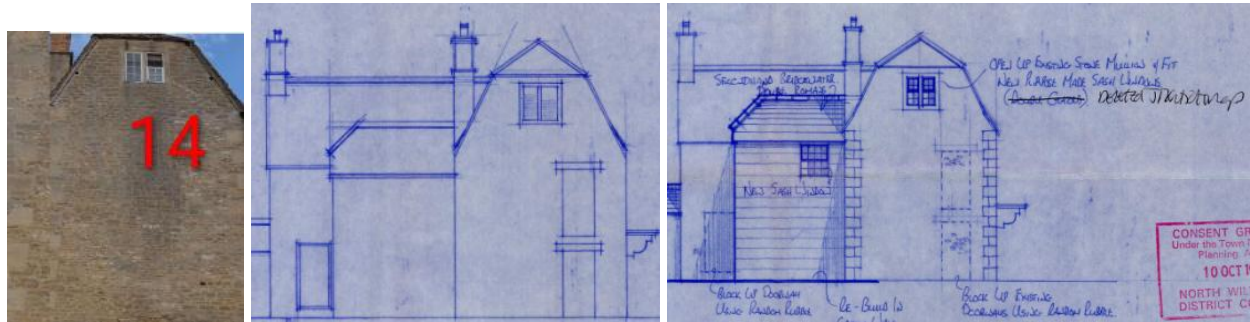
Existing elevation; details of the existing windows, and existing/ proposed drawings from 2019 application.

This window is the top-right-hand side of the front elevation of the building. The 1991 application shows that this window was replaced as part of the consented works. The previously consented scheme allowed for sash windows to be installed, with the rear of the balanced box sash protruding out from the wall. As seen on the existing photographs, only the central windows were installed with sash, with fixed windows to the either side. The sash is not counter balanced (either with weight or balanced spring), and opens by gravity, stopping on wooden blocks. This means that they are not fully openable and rely on the strength of the person opening/ closing the sash.

This raises a number of concerns including ensuring a safe means of escape and ensuring adequate ventilation. Whilst Building Regulations is not retrospective, and there is a balance between protecting the historic environment and the complying with Building Regulations, protecting life is important.

The evidence of the previous application shows that this window is a modern replacement, and therefore the fabric has limited significance. Within the area, there are a number of similar aged properties that have sash windows inserted into stone mullion windows, and these generally follow the same detail and pattern of a fixed window and a sash window and would have been part of the 'modernising' of the property. Historically, it is highly likely that the central window would be a metal casement with either a metal or timber fixed window either side. The principle of the casement is therefore acceptable, but dependant on the details.

Window 14



Existing elevation and existing/ proposed drawings from 2019 application

As with Window 9, this is a replacement window from the 2019 application, changing a casement window to the sash window. It would be highly unlikely that historically a sash window would be installed in an attic room as this would be conflict with the established hierarchy of the spaces. Attics spaces were low spaces, and therefore they would have had a cheaper construction of a casement window.

The proposed replacement of the existing window with an opening casement window with suitable glazing bars is considered acceptable. This would also mean that the opening space of the window will be enlarged and allow for the fire services, if required, to rescue anyone trapped in the room.

Window 15

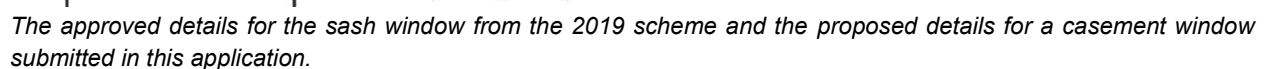


Existing elevation; details of the existing windows, and existing/ proposed drawings from 2019 application

As with Window 9 & 14, this is a replacement window from the 2019 application, changing a casement window to the sash window. It would be highly unlikely that a sash window would be installed in an attic room as this would be conflict with the established hierarchy of the spaces. Attics spaces were low spaces, and therefore they would have had a cheaper construction of a casement window.

The 2019 works to the windows and doors show that a number of changes were made to the existing windows to the principal elevations which included the insertion of sash windows. The style responds to other windows seen within the area but has resulted in poor windows to be installed. To the gable ends, the windows in the attic space were replaced with sash windows that would not be expected to be seen within this space. The principle of the proposed works therefore are considered to be acceptable.

The submitted information includes very open information, and this has added to the complication of this application. The proposed drawings highlight a number of glazing options (12mm, 14mm, 16mm, 20mm, 24mm & 24.8mm) and offered a number of 'selections', including head & jamb options. The drawings also show applied glazing bars with infill spacers within the double glazing, and no external putty details to match the existing. External putty on timber frames (as the existing windows are) is a traditional finish, and would be expected within a listed building.



Amended Application

The submitted scheme was for the replacement of all the windows and doors with new, with a change of design replacing the existing sash windows to the principal elevations (stone mullions) with casement windows, as the insertion of sash windows (with boxes for sash weights) was not able to be installed within the restrictions of the stone mullions. This raised a number of concerns and considerations. Following a discussion with the applicant (owners), it was agreed to alter the

application to the focus on the three windows that have failed (with glass/ Perspex falling out) and then reassess the remaining windows and doors in more detail.

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?	NA
(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

The NPPF confirms that when considering the potential impact of a development proposal on the significance of a designated heritage asset, substantial 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 will be a matter of considerable importance and weight which requires clear and convincing justification.

In this case the proposals will have no effect on the significance of the heritage asset(s) but would create a safe building that is watertight. On this basis no specific justification is required however it is considered the works will assist in securing the future use of a heritage asset in support of its long-term conservation.

The requirements of current conservation legislation, policy or guidance are considered to be met, and the application is recommended for approval.

RECOMMENDATION:

That Listed Building Consent be GRANTED, subject to the following conditions:

- *Time frame*
- *Drawings – tbc*
- *Glazing to be 12mm slim profile double glazed windows with integrated glazing bars*
- *Windows to be external putty*