

MEMORANDUM

From:	Built Heritage Officer		
Service	Green Infrastructure	App No:	253040
Address:	3-4 Market Place, Wokingham, RG40 1AL.		
Proposal:	Application for Listed Building Consent for the proposed replacement of vertical sliding timber sash casements to first and second floor windows on the front elevation.		
Heritage Asset:	Nos.3-4 Market Place – given grade II listed building status in 1951. Wokingham Town Centre Conservation Area Listed Buildings and Conservation Areas are classed as designated heritage assets under the NPPF (2024) and in the Council's Local Plan policies.		
Site Visit Made:	Exterior only viewed from within Market Place.		

Summary Of Recommendations

Objection, for the follow reasons:

- the loss of historic window sash casement units, for which it has not been adequately shown could not be repaired still,
- the proposal for the replacement sash casement to have double glazing units, contrary to the established practise when replacement of historic windows and the national guidance from Historic England.
- the visual harm the use of double glazing for the casements would have on the appearance as well as the reflective qualities of the windows and in so doing have an impact on the listed building and the conservation area.

As such the proposal is considered to go contrary to established heritage guidance and has failed to provide clear and convincing justification for the need to replace the historic casement units. Furthermore, the proposal is considered to go contrary to the Council's stated aims as set out in policy TB24 of the Council's Local Plan, Managing Development Delivery document.

Comments On Proposal

Nos. 3 and 4 Market Place, a pair of grade II listed buildings that are of group value within the historic Market Place core of the Wokingham Town Centre Conservation in which there is a high number of listed buildings, including the grade II* listed Town Hal that Nos 3- 4 Market Place face onto.

The Historic England held National Heritage List for England register description for the three-storey brick faced Nos. 3 and 4 Market Pace, which appears not to have been updated since their 1951 inclusion on the statutory list (given the reference to painted render front to No.4) describes the two properties as a former town house

of a late 18th century, altered in the mid-20th century, being now shops with offices over by the time of listing. The front windows of the upper floors of the two properties are referred to under the listing description identifying the buildings, in it being noted those to No. 4 being of wider width than those of No.3 Market Place.

Listed building consent is sort under this application to replace the vertical sash casement units to all four of the windows of the under floors, to the frontage of nos. 3 and 4 Market Place, whilst keeping the existing window sash boxes that are to be overhauled. The new replacement casements units are intended to replicate the existing whilst fabricated with hardwood frames, incorporating hidden draft seals and having double glazed sealed units to them, rather the single glazing the existing casement units.

Whilst the application form states no pre-application advice had previously been sort, a pre-application enquiry (250272) was made in February 2025 for the replacement of the front four upper floor windows. The case officer's response to that enquiry included the comments made by the Built Heritage Officer that referred to the well-established approach to windows of a listed building where it is established a window is of historic significance, is the expectation for it to be retained and repaired where necessary. It the response to the pre-application enquiry it was highlight the need for the significance of the existing windows be established before, from a heritage stance, a judgement could be made for replacement of the windows. And where it is intended to replace a historic window that holds significance in itself there is the need to provide adequate justification why replacement rather than repair is required.

Guidance within the Government's National Planning Policy Framework (NPPF) document under Chapter 16. Conserving and enhancing the historic environment, under paragraph 207 sets out that 'in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected..' with 'the level of detail should be proportionate to the assets' importance' that is 'sufficient to understand the potential impact of the proposal on their significance' with 'the heritage assets assessed using appropriate expertise where necessary.'

The NPPF also sets out a requirement (in paragraph 212) in '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 this is 'irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.' Furthermore, the NPPF goes on (para.213) to state a need for 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'

The applicant's design and access statement includes a heritage impact assessment. Under the chapter headed 3.0 Historic Significance statis that 'the historic significance of numbers 3 & 4 is primarily in relation to their context within the street scene and contribution to the historic centre of Wokingham - particularly the scale and proportion of the front facades which, together with the roof-form, contributes to an attractive, overall street composition.' There is no reference made to the contribution made by the upper floor windows despite the applicant having

assessed these windows to be in 'the proportions of the timber elements (frames and glazing bars) are delicate and typical of sash casements of this period (late C18).' There is no confirmation given the assessed age of the windows as to whether the glass of those windows is historic or not.

I am however of the opinion these upper floor front windows period elements of these historic buildings, which in the age and form of the windows are considered to hold a high degree of significance for their important contribution to the architectural period form and appearance of these building's as designated heritage assets, as well as in the context of the historic character and appearance of the conservation area in which the buildings are situated.

In the section headed 4.0 Proposal (points 4 & 5) of the D&A document whilst stating the existing vertical sash casements 'have been redecorated and repaired many times in the past...' and are apparently still capable of being redecorated. It is stated also the existing casements 'no longer a good fit within their frames' however there is no further explanation given as to actually meant by this, or evidence provided that this is an issue with all the window casements. The document does however go onto say this issue however 'could be partly remedied by the introduction of proprietary (remedial) draft-striping' but is said to be 'unsympathetic and would spoil the delicacy of the frames.' The applicant however gives no further details to substantiate that claim.

Evidence to justify the need for there being the need for replacement casement unit is considered here to be limited. There are four selective close-up photographs, annotated, show different portions of three of the four windows are presented that do not make clear the extent of the identified areas of missing and/or worn moulding of the glazing bars and casement surround.

Without further evidence being presented it is not currently possible to be able to accurately assess the requirement for the casement units to be replaced. It would seem the faults reported of worn, altered and /or damage glazing bars and frames to the casement would appear possible to be rectified through small, localised repairs and replacement.

In Section 8 Conclusion of the document, it is stated that applicant 'aspire to improve the thermal performance of their building stock, aligning with their credentials of carbon neutrality' and that 'historic buildings present particular challenges when it comes to upgrading thermal performance.' It being said 'the proposals contained within this application seek to restore building fabric without compromising the original heritage asset in either appearance or quality' and where historic fabric is to be replaced, the substitutions are proposed to replicate the appearance, material, finish, and proportions of the original.'

The introduction of double-glazed windows, even with the use of slim profile double glazing will undoubtedly effect the appearance of the window in terms of it slim

There are alternative means to improve thermal efficiency of existing windows without a need for them to be replaced with double-glazed units. Draught excusing measures to the existing windows will improve their thermal efficiency and help reduce street noise. As will the addition of thermal line curtains and /or blinds,

installation of secondary glazing are alternative or additional measures for consideration in situations like this.

With respect to replacement of the sash windows for new ones from a heritage stance this would only be acceptable where it is adequately demonstrated that the existing can no longer be repaired. In many cases repair of timber framed windows should be something that is achievable, through the replacement of the affected fabric. It is considered here that it has not been adequately demonstrated why the historic casement units would need to be replaced. Whilst the intention to replicate the casements to include individual sealed double-glazed panes goes contrary to the established heritage principle of replacement window units being faithful reproductions of the original, including the use of single glazing. The double-glazed units will have a physical impact in a need to change to the frame and glazing bar profiles of the casements in order to take these thicker glazed units.

As such, in my opinion, from a built heritage stance an objection is raised to the proposed replacement of historic sash casements with replicas that are to be double glazed. It being considered that the applicant has not adequately established the need to replace the sash casement units, or that they are no longer repairable. Whilst the intention for the replacement sash casement units to have double glazing going contrary to the established practice when replacement of historic windows and the national guidance from Historic England.

It is therefore concluded the proposal to go contrary to established heritage guidance and has failed to provide clear and convincing justification for the need to replace the historic casement units. Furthermore, the proposal is considered to go contrary to the Council's stated aims as set out in policy TB24 of the Council's Local Plan, Managing Development Delivery document.

Date:	03/02/26	Signed:	Keith Frost Built Heritage Officer
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Images sourced from search for historic images on Google.

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