

Delegated Report

Planning Application

Planning Application No: 20241157

Location: 62 & 64 Pelham Road Gravesend Kent

Description: Replacement upvc framed sliding sash windows to front elevation.

Applicant: Mr Gill, Gilman Services LTD

Site Visit Date: 23 January 2025

Submitted Documents/Plans

- Application form;
- Drawing no. 103 – Replacement Window Details Front Elevation;
- Drawing no. 102 – Replacement Window Details Block Plans As Existing & As Proposed;
- Drawing no. 101- Site Location Plan; and
- Planning & Heritage Statement.

Relevant Planning History

Reference	Description	Decision	Decision Date
20171129	Replacement timber framed sliding sash windows to front elevation.	Withdrawn	15.10.2019

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- TC3 – Development Affecting Conservation Areas

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the

NPPF (2024), the Council will also seek to replace these.

Other material considerations

Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended which states that, with respect to buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 12 – Achieving sustainable development and well-designed places
- 16 Conserving and enhancing the historic environment

Supplementary Planning Guidance

- Pelham Road/The Avenue Conservation Area Appraisal (2009)
- Management Plan Gravesend's 19th Century Suburban Conservation Areas (2009)
- Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020)

Other Guidance

- Historic England Traditional Windows Their Care, Repair and Upgrading (2017)

Consultations, Publicity and Representations

Consultees

No response from:

- GBC Conservation Officer

Neighbouring properties

6 surrounding properties were consulted plus site and press notices – overall consultation date was 21.02.2025 – no responses received.

Officer's Analysis

The application site consists of a semi-detached pair of late 19th century dwellings which are situated in the Pelham Road/The Avenue Conservation Area. The buildings are in use as flats and as such planning permission is required for to replace the windows. There is an Article 4 Direction on the Conservation Area which applies to all single family dwellings.

The proposal is to replace the existing timber, single glazed sliding sash windows with uPVC, double glazed sliding sash windows. It is stated that the windows will be the 'ECO Slide uPVC Vertical Sliding Sash Windows'.

The principal issue in the determination of this application is whether the windows would preserve or enhance the character or appearance of the Pelham Road/The Avenue Conservation Area.

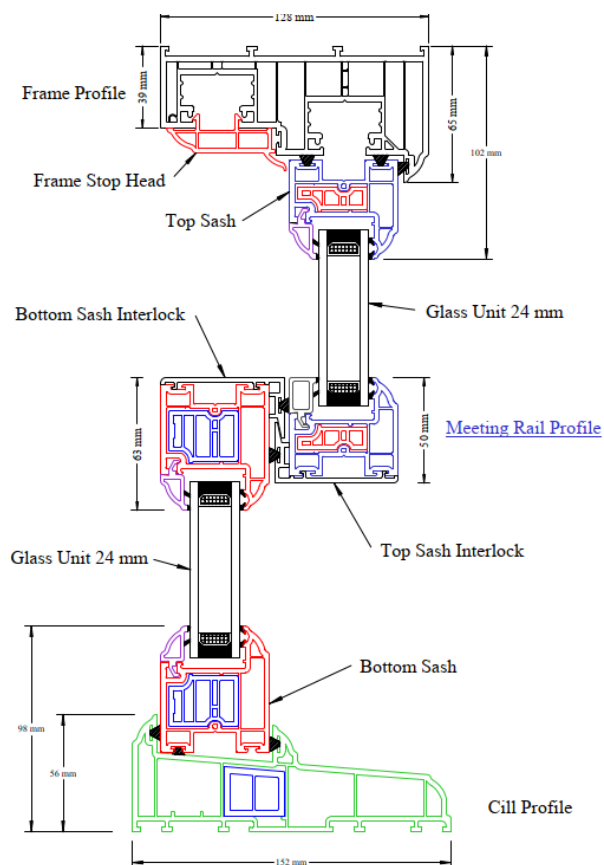
The existing windows are as follows:



The proposed elevation is as follows:



The window detail provided is as follows:



The existing timber, single glazed sliding sash windows in nos. 62 & 64 Pelham Road appear to be the original windows.

Supplementary Planning Document (2020) sets out the criteria for different examples of replacement windows depending on the age of the property and what the existing and proposed windows are:

The Council has adopted the following criteria for assessing applications for window alterations/replacements in unlisted buildings where an Article 4 Direction is in place:

1. Use of purpose made or high quality factory made timber sash/casement windows. Planning permission not required if windows are an exact copy, like for like, or replica.
2. Use of factory made timber sash windows or uPVC vertical sliding sash windows as replacements for Victorian/Edwardian one over one or two over two sash windows (i.e. windows with one or two panes, not Georgian style multi-paned windows which are commonly divided into six or eight small panes for each sash). Approve subject to choice of manufacturer and detailing; ensure that vertically sliding sashes are proposed.
3. Use of factory made timber or uPVC casements as replacements for Victorian/Edwardian casement windows. Approve subject to choice of manufacturer and detailing and ensure that casement is flush with the frame or recessed when closed. Use of aluminium profile casement windows in suburban houses (post 1920). Approve subject to choice of window style. In many cases aluminium replacements can match the appearance of original metal framed [Crittall] windows.
4. Applications to replace inappropriate modern windows in pre 1920 houses (i.e. houses originally built with timber sashes and casements) or post 1920 (i.e. houses originally built with metal framed [Crittall] windows. Approve subject to choice of style of replacement unit. The replacement should match the appearance of traditional sashes/casements/metal framed windows as far as possible.
5. Applications to replace traditional vertical sliding timber sash/casements windows with standard uPVC units (i.e. side hung, top hung, bottom hung, horizontal pivot, vertical pivot or louvre) will be refused.
6. uPVC or aluminium finish sliding sashes and casement windows which meet the colour, positioning and hanging criteria set out above, on non-principal or non-public elevations (elevations with no street frontage or open to public view) where it can be demonstrated that they do not harm the character or appearance of the conservation area and taking into consideration the age and style of the building and its immediate surroundings will be considered acceptable

The point relevant to this proposal is no. 2 as it is an application for uPVC vertical sliding sash windows as replacements for Victorian two over two sash windows. The guidance given is that in such cases these applications should be approved subject to choice of manufacturer and detailing and to ensure that vertically sliding sashes are proposed.

As stated, the existing windows appear to be the original sliding sash windows which are of elegant and fine proportions with single glazing. The windows that are proposed would be sliding sash windows in the two over two glazing arrangement as the existing windows are. However, from the detail submitted it can be seen that the proposed windows would be of much chunkier proportions when compared to the original windows as evident from the thickness and depth of the meeting rail, frame and cill which is due to the use of uPVC rather than timber. The proposed windows lack the finesse of the existing timber windows and the use of a standard moulded horn which would not replicate the horns of the existing windows. The proposed double glazing would be of 24mm which is extremely thick. This again causes the chunky proportions of the window to support the weight of the double glazing and would result in a thick and unsightly spacer bar which is another jarring feature adding to the unacceptability of the windows.

The proposed replacement windows in terms of being plastic, of thicker proportions, double glazing and a lack of finesse compared to the existing original windows would therefore not preserve the character or appearance of the Pelham Road/The Avenue Conservation Area but would cause harm to it.

It is noted that there are some other plastic and unsympathetic windows in Pelham Road but no applications have been permitted since the adoption of the Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020), or indeed since the current Development Plan, for replacement of timber sliding sash windows with uPVC sliding sash windows of thick and chunky proportions and thick standard double glazing.

From looking at permissions for replacement windows in Pelham Road since the current Development Plan it can be seen that there are two cases where permission has been granted for uPVC windows in the Conservation Area but these were cases where the previous windows were modern uPVC windows, which is not the case with this application.

Any other replacement uPVC windows will therefore have either been installed prior to the Article 4 Direction for this Conservation Area or it will also need to be checked if any of them were installed without planning permission. On that basis the presence of other plastic, double glazed and unsympathetic windows in Pelham Road is not considered to justify permitting this current proposal and those other cases only serve to demonstrate the harm that can be caused by inappropriate replacement windows. It also reinforces the importance of the Article 4 Direction on the Conservation Area which is to prevent the loss of any original features and reinstate them in an appropriate manner where they have been lost.

The harm that would be caused from the proposed replacement windows is considered to be less than substantial. Paragraph 215 of the NPPF (2024) advises that where a proposal would cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. It is stated in the Heritage Statement that the existing windows are in a poor state of repair, draughty and provide little thermal protection to the flats.

No window survey has been submitted with the application from a competent joiner to demonstrate that all the windows in the front elevation are beyond repair. The Council declared a Climate Emergency in June 2019 and retention and re-use is therefore more important than ever and renovating and reusing old materials is fundamental in helping to tackle these issues. A timber window is very rarely wholly unrepairable needing complete replacement, often it will just be sections or areas that require repair.

Historic England advice (Traditional Windows Their Care, Repair and Upgrading (2017)) sets out that although windows are generally accepted to amount to 10-20% of heat loss from buildings, this will vary greatly from building to building depending on size and number of openings in relation to the external wall area and that in many older buildings, windows are small relative to wall areas so the cost of double glazing will seldom be covered by energy savings within the lifetime of the insulated glazed units. Historic England advise that the thermal performance of traditional windows can be improved significantly by more appropriate methods such as draught proofing and secondary glazing and further benefits can be gained from closing curtains, blinds and shutters. It is stated that some of these measures can enable buildings that retain their historic windows to be more energy efficient than buildings whose windows are simply replaced with double glazed units.

The comments regarding the condition of the windows are noted however, for the reasons above this is not considered to outweigh the harm that has been found. Furthermore, in respect of the matter of the condition of the windows, the windows that are proposed are not the only option to address this matter.

Any Other Material Planning Considerations

None.

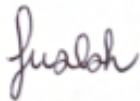
Conclusion

Overall, it is considered that the proposed replacement windows by virtue of their material, design and detailing would not preserve the character or appearance of the Pelham Road/The Avenue Conservation Area but would cause harm to it. As such, the proposal is contrary to Policies CS19 and CS20 (LPCS), saved Policy TC3 (LPFR) and section 16 of NPPF (2024).

Recommendation

Refusal

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	24th February 2025	Dated:	24 February 2025