Gravesham Borough Council

Delegated Report

Householder Planning Application

Planning Application No: 20231284

Location: 27A South Hill Road Gravesend Kent DA12 1LA

Description: Replacement of existing uPVC double-glazed windows to front elevation with timber slimline double-glazed windows.

Applicant: Mr Altinay

Site Visit Date: 11th January 2024

Submitted Documents/Plans

Application Form
Site Location Plan
Block Plan
1.01 – Existing Floor Plan
200102 1.01 Rev-004 – Proposed First Floor Plan
2.02 – Existing Second Floor Plan
200102 2.02 Rev-004 – Proposed Second Floor Plan
RF. 03 – Existing Roof Plan
200103 RF. 03 Rev-004 – Proposed Roof Plan
Existing Front Elevation
200201 Rev-004 - Proposed Front Elevation
Existing Window Details (Elevation and Section)
200301 - Rev-004 - Proposed Window Details (Elevation and Section)
Existing Window Details (Photograph)
Slimlite Proposed Window Data Sheet
Design and Access Statement
Heritage Statement

Superseded:

~~1.01 – Proposed First Floor Plan~~
~~2.02 – Proposed Second Floor Plan~~
~~RF. 03 – Proposed Roof Plan~~
~~Proposed Front Elevation~~
~~Proposed Window Details (Elevation and Section)~~
~~Lignum Proposed Window Data Sheet~~

~~Rev-003 - 1.01 – Proposed First Floor Plan~~
~~Rev-003 - 2.02 – Proposed Second Floor Plan~~
~~Rev-003 - RF. 03 – Proposed Roof Plan~~
~~Rev-003 - Proposed Front Elevation~~
~~Rev-003 - Proposed Window Details (Elevation and Section)~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20221138	Retention of new UPVC windows to the front, side and rear elevations	Refused	30.03.2023
19820584	Conversion of single dwellinghouse into flat and maisonette erection of single storey rear extension to form kitchen diner and erection of external staircase	Permitted	27.09.1982

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- TC3 – Development Affecting Conservation Areas

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving sustainable well-designed and beautiful places
- Section 15 – Conserving and enhancing the natural environment

Planning (Listed Buildings and Conservation Areas) Act 1990

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015);
- Householder Extensions/Alterations Design Guide (2021); and
- Conservation Area Maintenance/Replacement Windows and Doors Guidance
- Windmill Hill Conservation Area Appraisal

Consultations, Publicity and Representations

Consultees

Ward Councillors:

No comments received.

GBC Conservation Officer:

No comments received.

Neighbouring properties
5no. surrounding properties were consulted and a site notice was places on 11th January 2024. A notice was also placed in the Gravesend Messenger on 5th January 2024. The final date for comments to submitted ended on 2nd February 2024. No comments were received from members of the public.

Officer's Analysis

This application follows recent refusal 20221138 for *'Retention of new UPVC windows to the front, side and rear elevations.'* Planning permission was not obtained prior to undertaking the works and this application was submitted after and subsequently refused for the following reason:

1. *The replacement of the existing timber windows with uPVC double glazed windows, would be a harmful alteration that would neither preserve or enhance the character or appearance of the Windmill Hill Conservation Area. As such the proposal is contrary to Policies CS19 (Development and Design Principles) and CS20 (Heritage and the Historic Environment) of the adopted Gravesham Local Plan Core Strategy Adopted Version (September 2014) and Saved Policy TC3 (Development Affecting Conservation Areas) of the Gravesham Local Plan First Review 1994. The development also conflicts with section 12 - Achieving sustainable development and well-designed places and Section 15 - Conserving and enhancing the natural environment of the National Planning Policy Framework (2021).*

This application as submitted provides an alternative, in that it seeks to replace these with timber framed windows, which are slimline double glazed. It should be noted that the application only provides drawings and details for the existing windows, which do not have planning permission. So, whilst these drawings are somewhat useful for comparison, they do not represent the original windows, which should currently be in situ. No consent for replacement windows has been granted for this property, which is covered by an Article 4 Direction, which will be detailed as follows.

Given that this is an alternative scheme, an assessment should be made as to whether the proposed scheme would overcome the previous reason for refusal. Where relevant, for consistency, the assessment will reflect the previous assessment.

Conservation Area

The principal issue in the determination of this application is the effect of the proposed development on the character and appearance of the Windmill Hill Conservation Area.

The Windmill Hill Conservation Area Appraisal highlights that the loss of original architectural features, such as doors and windows is a principal negative feature in the Conservation Area. Under the section on 'Issues' in the Conservation Area it states that it is evident that well-intentioned, but unsympathetic changes, especially to doors, windows and roofs, have begun to have a cumulative effect, causing loss of original architectural features that is damaging to the character of the conservation area.

An Article 4 Direction was introduced in 2008 as the Council was concerned that unsympathetic alterations

to houses that harm or erode the character and appearance of the area had been carried out. The aim of the Direction is to prevent harmful changes encouraging the careful repair of original or period features, and where they have already been lost, ensure that the replacement of any modern windows and doors results in the reinstatement of an appropriately traditional type. Therefore, planning permission is required to replace any windows and doors in any elevation that fronts a highway as set out in the Direction; this includes South Hill Road. As such, planning permission is only required to replace the windows in the front elevation of the property. The replacement of the windows in the rear and the windows and door in the side elevation would not require permission as those elevations are not covered under the Direction as they do not front a highway. This new application therefore only relates to the replacement of the first and second floor windows serving this flat to the front.

For the previous application there were two main points of contention; the use of upvc framed windows, and the use of double glazing and the subsequent impact on the design of the window. This new proposal would use slimline timber framed windows instead of upvc which will overcome some of the concerns previously raised. The remaining issue therefore would be the use of double glazing and how it would impact the design of the windows.

This particularly building is a three storey, semi-detached building, split into 2 flats 27a, South Hill Road and 27 South Hill Road (forming the upper two floors). The high quality traditional detailing, such as sash windows, makes a positive contribution to the character and appearance of the Conservation Area.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Paragraph 205 of the National Planning Policy Framework (NPPF) states that great weight should be given to the conservation of a designated heritage asset, in this case the Conservation Area.

Policy CS20 (Heritage and the Historic Environment) of the Gravesham Local Plan Core Strategy states that proposals will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting and their interpretation and enjoyment.

Saved Policy TC3 (Development Affecting Conservation Areas) of the Gravesham Local Plan First Review 1994 expects proposals to make a positive contribution to the Conservation Area. Policy CS19 (Development and Design Principles) of the Gravesham Local Plan Core Strategy expects development to be visually attractive and conserve and enhance the character of the local built historic and natural environment.

It is useful to understand how the windows have changed over time and so the images below are useful:

Image taken during a site visis on 13/03/23

Google earth images taken May 2018

Google earth image taken October 2008

As the images show, at some point between 2014 and 2018, the original timber, sliding sash windows were retained but a secondary internal glazing system appears to have been installed. Then by 2022, the windows had been replaced with the current upvc windows and composite door.

It is noted that the slimline glazing and integral glazing bars and surround, would be a better example replicate of the original windows, than previously proposed elsewhere in the street. It is noted that in refused application for the neighbour's property ref 20170033, differed as the proposed windows had a thicker surround, giving it a modern appearance unsympathetic to the designated heritage asset.

The below image is of one of the original timber sash windows which was removed.

The below close up of one of the replaced rear windows, shows a stark contrast in the appearance of those windows, largely due to its upvc material.

The assessment made under 20221138 stated the following [Emphasis added]:

… the upvc windows and composite door have introduced a visually apparent, modern and out-of-character material to the existing largely coherent historic appearance of the property. The flat, machine-made surface of uPVC windows is quite different in character to painted wood. They contrast significantly in appearance to the existing traditional sash windows and do not replicate their distinctive character and quality.

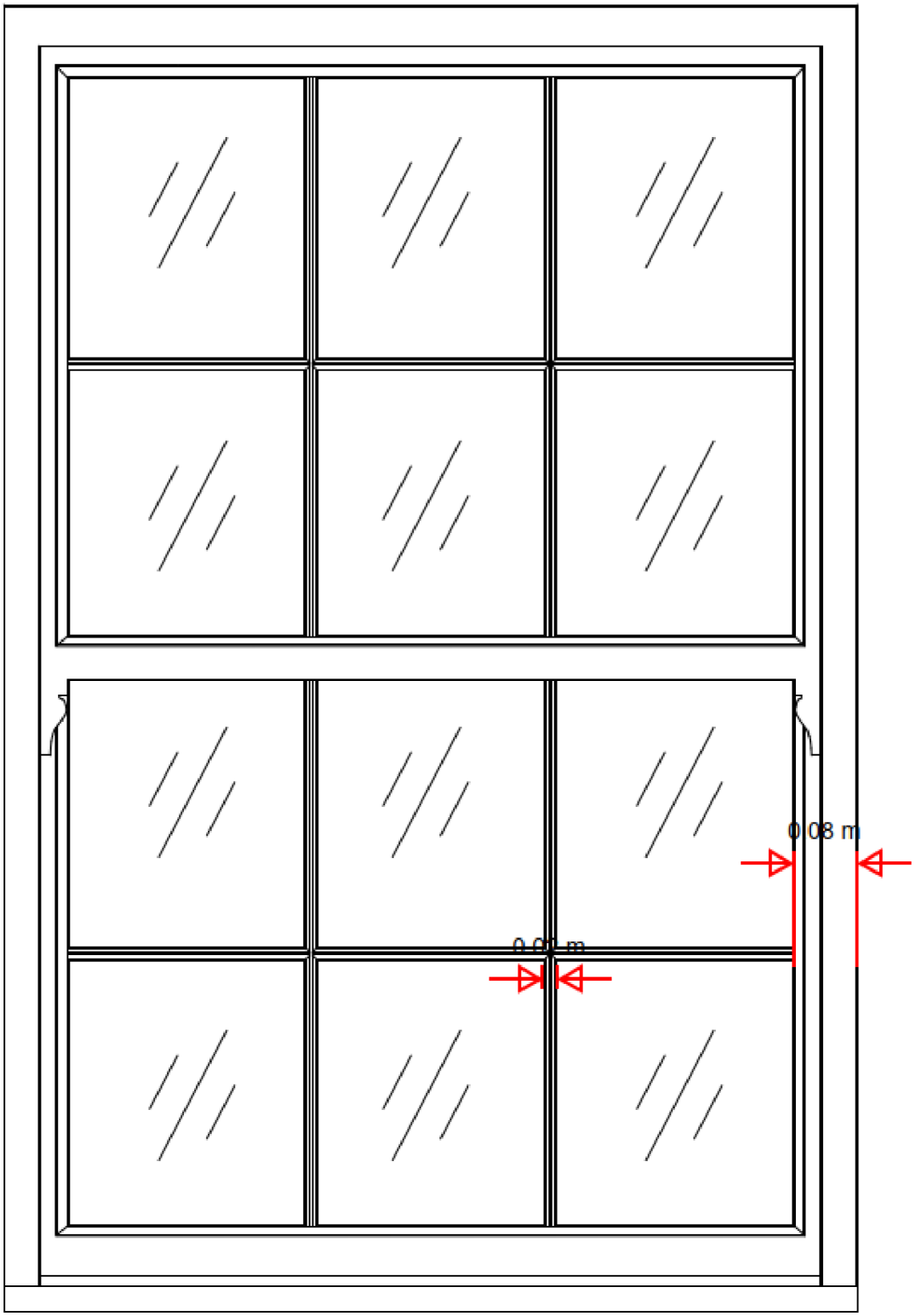
There has been a loss of original fabric, replaced with an alien and inauthentic material which reflects nothing of the 19th century character of the building. This has eroded the original character and appearance of the existing windows as a distinctive feature and the authenticity and integrity of no. 27 as an important heritage asset would be seriously undermined. ***Furthermore, the double glazing has resulted in a double reflection and even chunkier proportions for the window frames in order to take the weight and thickness of the double glazing.***

Overall, the proposal would harm the positive contribution made by the building to the character and appearance of the Conservation Area. In this way the character and appearance of the Conservation Area would be neither preserved or enhanced.

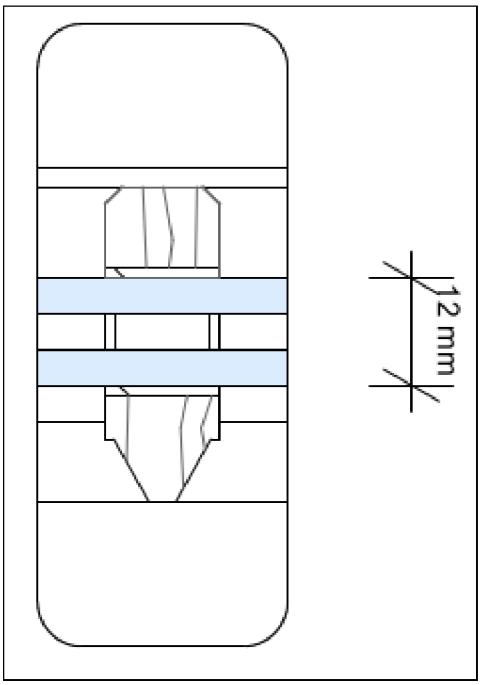
The below images were taken on 11th January 2024 for this latest application.

When compared to the earlier images of the original single glazed timber openings, it clearly demonstrates key differences when double glazing is used as noted in the previous assessment. These key differences are; the required use of thicker framework than when single glazing is used and a double reflection from the street scene.

The below details the proposed windows (Not to Scale):



Proposed



Following discussions with the planning agent, amended plans were provided, detailing a 12mm thick glazing system, as above. Slimline glazing of 12mm or less has a lesser impact than other double-glazing options as it reduces the necessary thickness of the timber framework and limits the double reflection. Whilst it would not be an exact replica of the single glazed timber panels, the proposed slimline windows, would from pedestrian perspective appear similar to the original openings.

Conclusion & Recommendation
In conclusion, it is considered that the proposal would preserve the character and appearance of the Windmill Hill Conservation Area. As such the proposal is compliant with Policies CS19 (Development and Design Principles) and CS20 (Heritage and the Historic Environment) of the adopted Gravesham Local Plan Core Strategy Adopted Version (September 2014) and Saved Policy TC3 (Development Affecting Conservation Areas) of the Gravesham Local Plan First Review 1994. The development also complies with Section 12 – Achieving well-designed and beautiful places and Section 15 – Conserving and enhancing the natural environment of the National Planning Policy Framework (NPPF). Refusal Reason 1 for previous planning refusal reference 20221138, would overcome by the changes made to the development, in this application.

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

Case Officer:	Mrs Lisa Fisher	**Team Leader:**	Miss Faye Hobbs
Signed:	[redacted]	**Signed:**	[redacted]
Dated:	5th February 2024	**Dated:**	06 February 2023