

Delegated Report

Householder Planning Application

Planning Application No: 20221148

Location: 15 Sheppy Place Gravesend Kent DA12 1BT

Description: Replace front 3 timber, single glazed windows with double glazed upv-c windows and replace front, wooden door to a composite wood door

Applicant: Grace & Alex Davies & Leggatt

Site Visit Date: 2 December 2022

Submitted Documents/Plans

- Application form;
- OS Plan;
- Drawing – Front Elevation As Existing; and
- Drawing – Front Elevation As Proposed.

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (September 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 33 of the NPPF (2021) 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 (2021), 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

Supplementary Planning Guidance

- Upper Windmill Street 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)

Consultations, Publicity and Representations

Consultees

No response received from:

- GBC Conservation Officer

Neighbouring properties

10 surrounding properties were consulted plus site and press notices – no responses received. The overall consultation date expired on 16 December 2022.

Officer's Analysis

The site consists of a two storey mid terrace dwelling situated in the Upper Windmill Street Conservation Area.

The principal issue in the determination of this application is whether the proposed works would serve to preserve or enhance the character or appearance of the Darnley Road Conservation Area.

The existing windows in the front are not the original windows but are timber casement windows and the existing front door is also not the original front door but is a timber door as seen in the below image:



On the application form it is stated that the proposal is to replace the front three timber single glazed windows with double glazed uPVC windows the same shape of the window and replace the wooden front door to a composite wooden door.

The existing and proposed elevations are as follows:



Supplementary Planning Document 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

It appears the point most relevant to this proposal would be point no. 4 as it is an application to replace inappropriate modern windows in a pre-1920 house (inappropriate in the sense that they are not timber sliding sash windows which is what the property would have originally had). The advice given is that in such cases these applications should be approved subject to choice of style of replacement unit and that the replacement should match the appearance of traditional sashes as far as possible.

As stated, the original windows in the property would have been timber single glazed sliding sash windows most likely in the one-over-one glazing arrangement. The replacement windows would be plastic and with what appears to be bottom hung casement windows (denoted by the thickness of the frame of the bottom window). It would not therefore match the appearance of a traditional sash window. Due to the fact that the replacement windows in terms of being plastic, of thicker proportions, with a prominent visible bottom hung opening and with the top of the window not following the round headed opening as well as the existing windows do, all means that the replacement windows would be more harmful to the character of the dwelling than the existing modern windows and in this respect the character and appearance of the Upper Windmill Street would not be preserved but would be harmed.

It is noted that there are many other plastic windows in Sheppy Place but none have been permitted since the adoption of the Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020). In fact no replacement windows have been permitted since the adoption of the current development plan in 2014. The plastic windows which currently existing are therefore historic examples prior to the Article 4 Direction coming into force and it would also need to be checked if any of them are unauthorised. On that basis the presence of other plastic windows in Sheppy Place is not considered to justify permitting this current proposal and they only serve to demonstrate the harm that can be caused by inappropriate replacement windows. It also reinforces the importance of the Article 4 Direction which is to prevent the loss of any original features and reinstate them in an appropriate manner where they have been lost.

With regards the front door, the existing door is modern inappropriate design with the 'dropped fanlight'

design etc but it is at least timber. The proposal is to replace this with a composite door of the same design including 'dropped fanlight' design. The Council's Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document sets out the criteria for different examples of replacement doors depending on the age of the property and what the existing and proposed doors are:

The Council has adopted the following criteria for assessing applications for door alterations/replacements in unlisted buildings where an Article 4 Direction is in place:	
1.	Use of purpose made or high quality factory made timber doors and frames. Planning permission not required if doors and frames are an exact copy, 'like-for-like', or replica.
2.	Applications to replace inappropriate modern doors. Approve subject to choice of style of replacement door. The replacement should match the appearance of traditional doors as far as possible.
3.	Applications to replace traditional timber doors with a standard composite door and frame (i.e. modern factory manufactured doors using modern materials) will be refused.
4.	Leaded lights replicated by plastic or applied lead strips will be refused.

Of relevance to this proposal is point no. 2 as this proposal is to replace an inappropriate modern door. In such cases it states that applications should be approved subject to choice of style replacement door and that the replacement should match the appearance of traditional doors as far as possible. In this case the door would not match the appearance of a traditional door as it would be of the 'dropped fanlight' design (which is an unauthentic modern interpretation of fanlights above doors being incongruously incorporated within the door itself). The door would also be composite material when the original door for the property would have been timber. The replacement of the existing timber door with composite would also cause harm as it would be of even less traditional material than the existing timber door and therefore it would be more harmful to the character of the dwelling than the existing modern door and in this respect the character and appearance of the Upper Windmill Street would not be preserved but would be harmed. Again it is noted that there are other examples of inappropriate front doors but none have been granted permission since the adoption of the Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020) or the current development plan in 2014. These other examples do therefore not provide justification for allowing this current proposed replacement door but serve to show the harm that can be caused by such inappropriate doors and the importance of the Article 4 protection in terms of ensuring appropriate replacements are installed where original doors have been lost.

Overall therefore it is considered the proposed replacement windows and front door by virtue of their material, design and detailing would not preserve the Upper Windmill Street 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 (NPPF, 2021).

Any Other Material Planning Considerations

None.

Conclusion & Recommendation

Overall therefore it is considered the proposed replacement windows and front door by virtue of their material, design and detailing would not preserve the Upper Windmill Street 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 (NPPF, 2021).

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

Case Officer:	Ms Rebecca Harrison	Team Leader:	Miss Faye Hobbs
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Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	10th January 2023	Dated:	11 January 2023

Gravesham Borough Council