

Planning & Heritage Statement

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Planning & Heritage Statement

Retrospective planning application for the installation of replacement PVCu windows at ground and first floor levels

27 Cobham Street, Gravesend

Quota Ltd

January 2025

YOUR REF:

OUR REF: 0508.01.RPT-M24

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Introduction

Section 1

- 1.1 Tetlow King Planning have been instructed by Quota Ltd to submit this application relating to retrospective permission for the replacement of PVCu double glazed windows to the ground and first floor front elevation of 27 Cobham Street.
- 1.2 This combined planning and heritage statement assesses the planning merits of the proposals as well as meeting the requirements of paragraph 200 of the NPPF in describing the heritage assets and the impacts of the proposed development.
- 1.3 This Planning Statement is set out in six sections:
- Section 2 sets out the context of the site and its surroundings;
 - Section 3 sets out the details of the proposals;
 - Section 4 sets out the planning policy context;
 - Section 5 sets out the planning justification for the application cross referencing the proposals against the planning policy context; and
 - Section 6 sets out the overall planning balance.

Site and Surroundings

Section 2

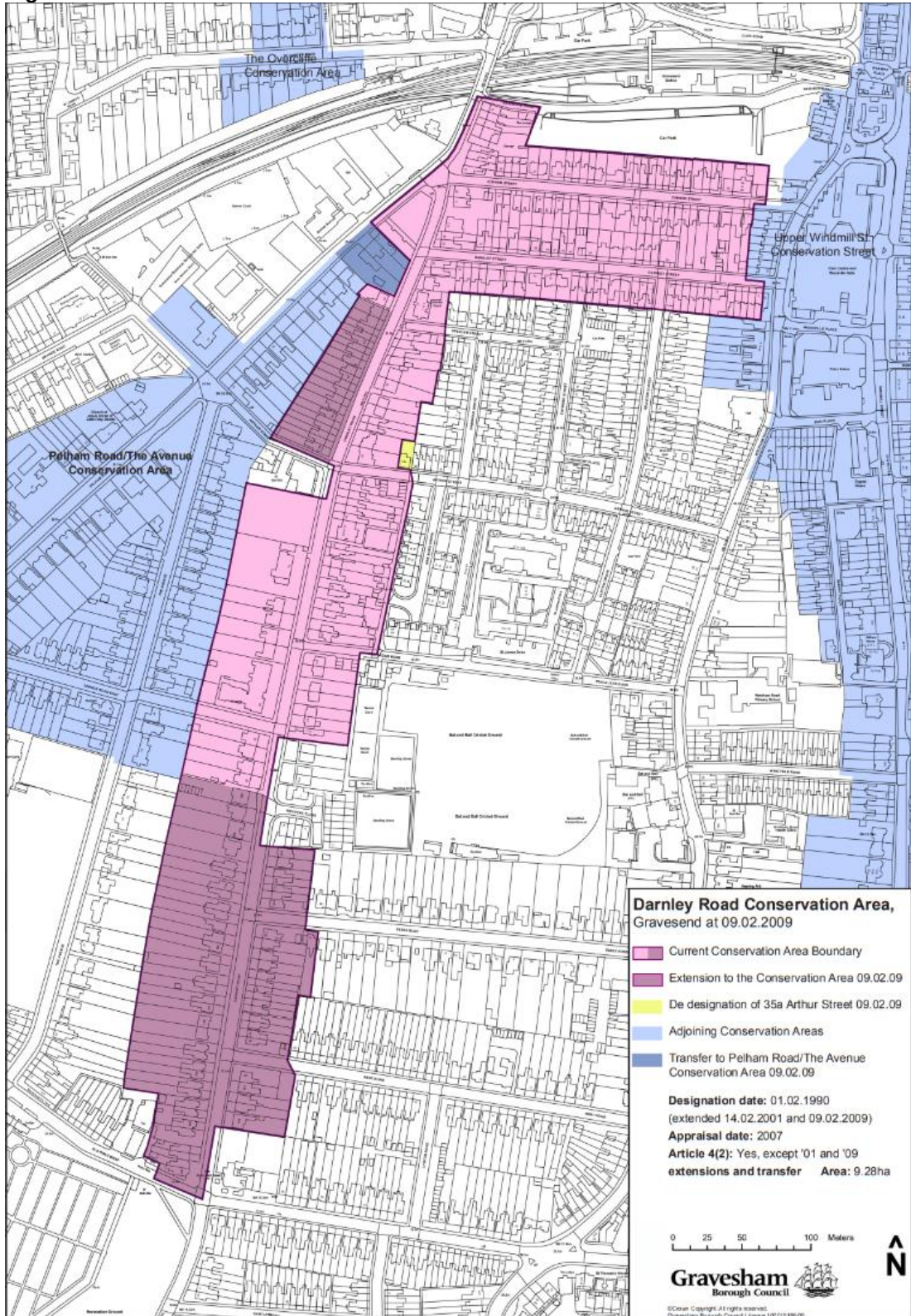
- 2.1 Number 27 Cobham Street is a 3 storey plus lower ground floor, semi-detached property. The ground and lower ground floors are rendered, whilst the first and second floors are yellow stock façade with rendered quoin detailing and characteristic of the immediate area.

Figure 2.1: Application site (source: Google street view)



- 2.2 The property is divided into four apartments, with the applicant owning all but the top floor apartment.
- 2.3 The site is located within the Darnley Road Conservation Area, which was first designated in February 1990 (extended in February 2001 and then further altered in 2009) and has a conservation area appraisal dated 2009. The Conservation Area boundary is replicated below:

Figure 2.2: Conservation Area extent



2.4 As noted, this conservation area includes the road on which the application site is located, as well as Darnley Street to the immediate south and then Darnley Road to the south west.

Development Proposals

Section 3

- 3.1 The application relates to the replacement of windows to the ground and first floor of the property with PVCu casement windows.
- 3.2 The windows are double glazed casements with the lower pane being openable as top hung casement. These windows function as alternative means of escape in the event of fire from the premises.

Planning Policy Framework

Section 4

Introduction

- 4.1 Statutory guidance and Development Plan policies have been important considerations in the preparation of the proposal and details of the relevant guidance against which the application is to be considered are set out below. The implications of these policies and other material considerations are addressed in Section 5 of this statement, which sets out our planning case.
- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 an application should be determined in accordance with the development Plan unless material considerations indicate otherwise.
- 4.3 The current Development Plan for the administrative area comprises the Gravesham Local Plan Core Strategy (2014) and Saved Policies of the Gravesham Local Plan First Review (2014). Other material considerations include Supplementary Planning, the National Planning Policy Framework and Planning Practice Guidance (PPG).

Development Plan

Gravesham Local Plan Core Strategy (2014)

- 4.4 The Local Plan Core Strategy (hereafter LPCS) was adopted in 2014 and sets out the Council's strategic policies and proposals for the development and use of land within the Borough up to the period of March 2028
- 4.5 The urban area of Gravesham is identified as the primary 'Tier 1' settlement within the Borough and as such, the most sustainable location within the Borough.
- 4.6 Listed below are those policies relevant to this application:
- CS19 - Development and Design Principles.
 - CS20 – Heritage and the Historic Environment

Gravesham Local Plan First Review 1994

- 4.7 The only relevant saved policy from the Local Plan is set out below:
- TC3 – Development Affecting Conservation Areas.

Material Considerations

National Planning Policy Framework (2023)

- 4.8 In December 2024 the Government published the latest National Planning Policy Framework (NPPF) which sets out its objectives for securing sustainable economic growth and the approach for ‘plan making’ and ‘decision taking’ for all planning policy in England. Full regard must be had to the NPPF as an overarching material consideration in the determination of this application.
- 4.9 At the heart of the NPPF is a presumption in favour of sustainable development, encompassing social, economic and environmental roles. The approach to sustainable development involves making the necessary decisions now to realise the vision of stimulating economic growth, maximising wellbeing and protecting our environment, without negatively impacting on the ability of future generations to do the same.
- 4.10 Paragraph 8 of the NPPF states that under this approach, planning is expected to deliver:
- A strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; by identifying the provision of infrastructure (Economic role);
 - Strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible local services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being (Social role); and
 - Contribute to protecting and enhancing of our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (Environmental role).
- 4.11 The presumption in favour of sustainable development means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

4.12 Furthermore, paragraph 8 confirms that these roles are interdependent and need to be pursued in mutually supportive ways.

4.13 In considering planning applications, paragraph 39 requires local planning authorities to

“approach decisions on proposed development in a positive and creative way”.

4.14 It goes on to state

“Decision-makers at every level should seek to approve applications for sustainable development where possible”.

4.15 Chapter 12 of the Framework seeks to achieve well-designed places, and in this regard is key in the assessment of the proposed development. In particular, paragraphs 131, 135, and 139 which collectively seek to ensure that developments will function well and add to the overall quality of the area, are visually attractive and are sympathetic to local character, among other listed objectives.

4.16 Chapter 16 relates to conserving and enhancing the historic environment. Paragraph 204 states

“When 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 the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

4.17 Paragraph 207, states

“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affecting, including any contribution made by their setting. The level of detail should be proportionate to the assets importance and not more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”

4.18 Paragraph 212 notes

“When 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 the more important the asset, the greater the weight should be).”

This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

4.19 Paragraph 215 goes on to state

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

National Planning Practice Guidance

4.20 Planning Practice Guidance published in March 2014 (“PPG”) is a ‘live’ document that builds on the principles and provides further detailed technical guidance to complement the NPPF.

4.21 The PPG reinforces the importance of the NPPF as representing the most up-to-date Government planning policy, which must be taken into account where it is relevant to a planning decision.

4.22 In term of heritage the PPG states

“Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework paragraph 189). In doing so, applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset’s importance and no more than is sufficient to understand the potential impact of the proposal on its significance.” (Paragraph: 009 Reference ID: 18a-009-20190723).

4.23 The PPG goes on to state

“The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation. It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.” (Paragraph: 015 Reference ID: 18a-015-20190723)

Supplementary Planning Guidance

Conservation Area Character Appraisal (2009)

- 4.24 The site falls within the Darnley Road Conservation Area for which the Conservation Area was published in 2009 with the commentary that

“This document was prepared on behalf of Gravesham Borough Council based on an extensive survey dated 2007...”

- 4.25 Paragraph 3.2 describes the activities and uses within the conservation area, noting that

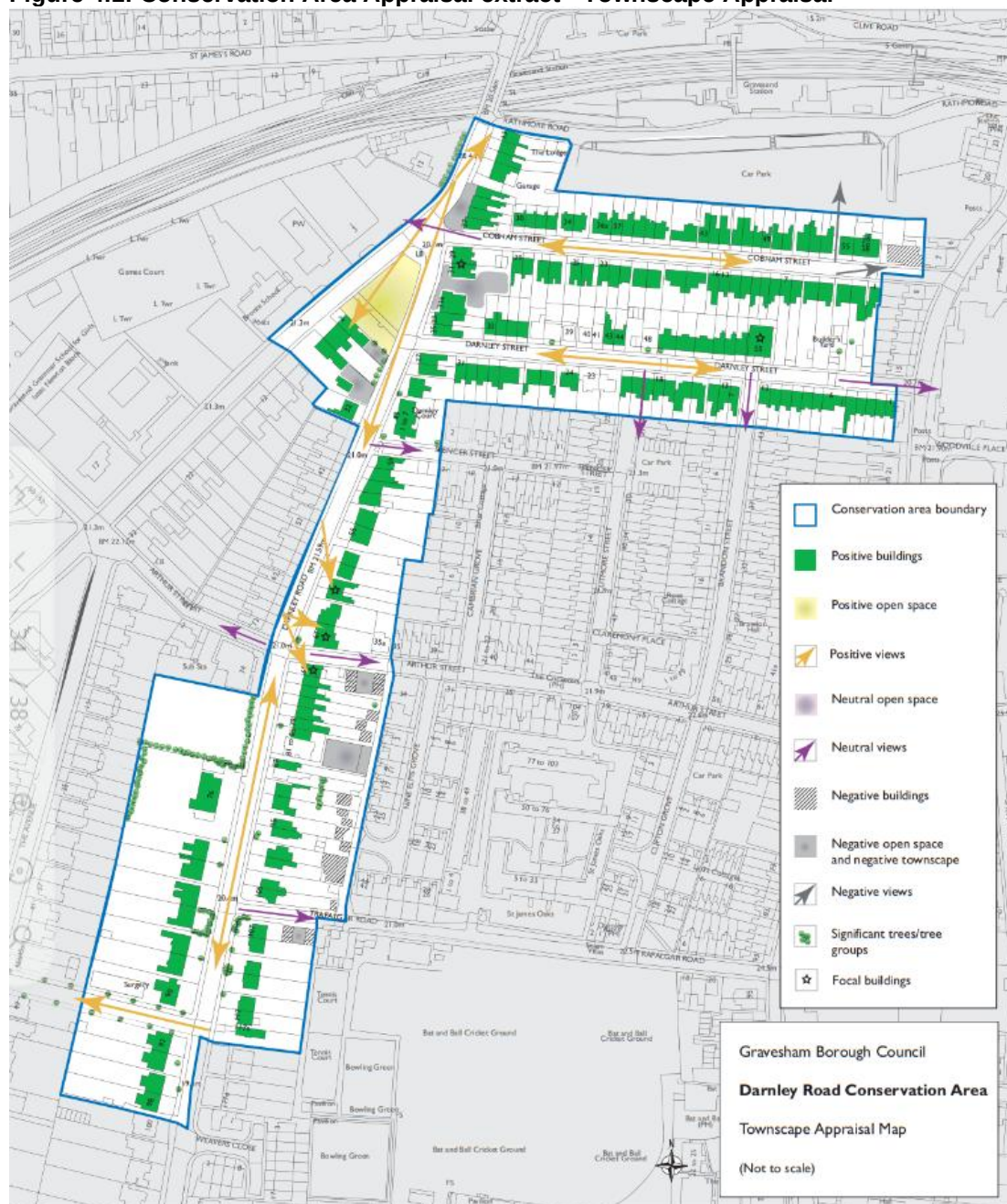
“While there is a reasonable amount of pedestrian movement around the streets of the Conservation Area in the daytime, most of the activity is related to the car, van and lorry traffic on Darnley Road, which is usually passing through the area. The narrower side streets of Cobham Street and Darnley Street are relatively quiet although they provide connections between Darnley Road and Wrotham Road and are used by occasional traffic via a one way system.”

- 4.26 Section 7.5 relates to key unlisted buildings within the conservation area, and it notes that within Cobham Street all buildings save for the extension to no.7 Wrotham Road are considered to be key buildings. The supporting text notes that

“Buildings identified as having ‘townscape merit’ will vary, but commonly they will be good examples of relatively unaltered historic buildings where their style, detailing and building materials provides the streetscape with interest and variety. Most importantly, they make a positive contribution to the special interest of the Conservation Area.”

- 4.27 This is represented graphically in the below extract from the guidance

Figure 4.1: Conservation Area Appraisal extract - Townscape Appraisal



4.28 The site falls within Character Area 2 where it notes that the principal positive features include:

“Sash windows, retaining their original glazing pattern and divided into small panes, giving a predominantly vertical emphasis,”

4.29 It then notes the negative features which include

“Loss of original features such as sash windows and their unsympathetic replacement;”

Conservation Areas Maintenance/Replacement Windows and Doors Guidance (2020)

4.30 This SPD was adopted in June 2020 to provide guidance in respect of works to doors and windows within conservation areas.

4.31 Paragraph 3.2 of the guidance sets out the scope of works for which planning permission is required, those being

- “• The removal or replacement of windows and doors if there is a material change in the design, materials and profiling from those being replaced;*
- Material changes¹ to in-situ windows and doors, including repairs and change of colour;*
- Reinstatement of an original window or door which had previously been removed.”*

4.32 The footnote 1 states

“Material changes are those that would result in changes to the appearance of your building as well as how that changed element functions. In the case of alterations to windows and doors these could be the change in the profile and size of a window frame or materials that windows or doors are made of.”

4.33 The guidance notes at paragraph 3.4 that

“Applications to replace original/historic windows will only be supported where it can be demonstrated to the Council’s satisfaction that they have deteriorated beyond practical and/or economic repair.”

4.34 The guidance continues at paragraph 4.1 to note

“In non-listed buildings subject to an Article 4 Direction in a conservation area, planning permission will not be required for like-for-like³ repairs and replacement.”

4.35 Footnote 3 states

“In both un-listed and listed buildings “like-for-like” means the same materials, details of construction, dimensions, opening method, decorative finish and details as existing including glazing type and fixing of glass (e.g. putty). The original proportions and glazing pattern must also be respected.”

Planning Considerations

Section 5

- 5.1 This section of the statement provides a justification for the proposal having regard to the relevant planning policy background and the character of the local area.

Principle of development

- 5.2 Planning permission is required due to the change in material and detailing of the windows, albeit the current windows replace earlier windows that were installed in the building.
- 5.3 The acceptability of the windows depends on the impact to the building itself and the wider conservation area, which are matters addressed below.

Impact on the individual building

- 5.4 The replacement of previous PVCu windows at ground and first floor levels does not of itself cause any detrimental impact to the building as they have been installed in the original window openings, so have not changed the physical fabric of the building beyond the windows themselves.
- 5.5 The use of modern materials for windows does not materially alter the general appearance of the application property or its relationship with the other semi of no.26 such that it does not detract from the building as a whole so as to cause unacceptable harm to the building.

Impact on the wider Conservation Area

- 5.6 The conservation area appraisal notes that all of the buildings along Cobham Street, other than the rear extension to 7 Wrotham Road are considered to be key unlisted buildings

“identified as being of buildings of townscape merit. Buildings identified as having ‘townscape merit’ will vary, but commonly they will be good examples of relatively unaltered historic buildings where their style, detailing and building materials provides the streetscape with interest and variety. Most importantly, they make a positive contribution to the special interest of the Conservation Area. Where a building has been heavily altered, and restoration would be impractical, they are excluded.”

- 5.7 This is relevant when considering the appearance of buildings at the time of the appraisal (that being 2007 albeit not adopted until 2009). Google street view imagery for Cobham Street dating back to before the adoption of the appraisal is limited but by chance covers the application site and the immediate surrounding area.
- 5.8 As of October 2008, the application site still retained timber sash windows as did the other semi of no.26. However, no. 24 clearly displays PVCu windows to all levels, appearing to be casements with the opening lower half window (see Figure 5.1)
- 5.9 Within the immediate vicinity of the application there are numerous properties that either have PVCu windows or aluminium frames that are clearly not original detailing. Whilst some retain the proportions of original sash windows but now as casements, others have changed entirely with top hug casements with smaller openings as well as losing the arch detailing.

Figure 5.1: No's 26 and 27 Cobham Street (October 2008)



Figure 5.2: No's 24 and 25 Cobham Street (October 2008)



- 5.10 In the case of no's 24 to 27, although no.24 has modern PVCu windows, the window profile adopts the same proportions as the original timber sash and therefore has a lesser impact in terms of losing character.

- 5.11 The same cannot be said for the arrangement of the windows to 30 Cobham Street as the original sash windows have been replaced with modern PVCu top hung casements. The original proportions of the sash have been lost, together with the arch frame detailing, such that the windows appear entirely at odds with the neighbouring properties of no's 31 and 32 which retain the original features.
- 5.12 No 33 has been more significantly altered with painted brickwork thereby losing the more intricate brick detailing, as well as the complete loss of the arch detailed heads and the introduction of modern PVCu windows with narrow top hung casements and a modern replacement glazed door.

Figure 5.3: 30 Cobham Street (October 2008)



Figure 5.4: 33 Cobham Street (October 2008)



Figure 5.5: 34 Cobham Street (October 2008)



Figure 5.6: 36 Cobham Street (October 2008)



Figure 5.7: No's 37 to 41 Cobham Street (October 2008)



5.13 Similar unsympathetic windows also feature in no's 34 and 36 to 41 Cobham Street as of October 2008, with a mix of PVCu and Aluminium frames. Properties further east are unfortunately unavailable from 2008.

5.14 Of course, the images in 2008 are only a snapshot in time and don't necessarily represent the character of the conservation area now noting that the aim of the conservation area designation is to restore the original character of the area and address what it noted as the negative features which are namely the

"Loss of original features such as sash windows and their unsympathetic replacement"

5.15 A true test of the impact of the designation is therefore to consider each of those properties identified in the imagery above again using the most up to date Google street view images to show the impact of change.

Figure 5.8: No's 26 and 27 Cobham Street (November 2022) Figure 5.9: no's 24 and 25 Cobham (November 2022)



5.16 In the 14 years that have passed between the images, and 13 years post adoption of the conservation area appraisal seeking to bring about restoration of lost features (typically the traditional windows) the images below in figures 5.10 to 5.14 show no alterations to any of the properties previously identified as having modern replacement PVCu or aluminium windows that would restore traditional features previously lost.

- 5.17 When looking at 34 Cobham Street (figure 5.12) it is noticeable that the entrance door has changed from the previous glazed door (that shown in figure 5.5) to a more modern PVCu door with two smaller glazed panels. Again, this alteration has not brought about the restoration of original features that the conservation area appraisal sought to achieve.
- 5.18 The only property that has sought to reinstate original features is 37A Cobham Street, which has a current pending application (20240218) relating to the installation of new timber sliding sash. This application does not however include replacement of the existing entrance door which is again a more modern PVCu equivalent.

Figure 5.10: 30 Cobham Street (November 2022)



Figure 5.11: 33 Cobham Street (November 2022)



Figure 5.12: 34 Cobham Street (November 2022)



Figure 5.13: 36 Cobham Street (November 2022)

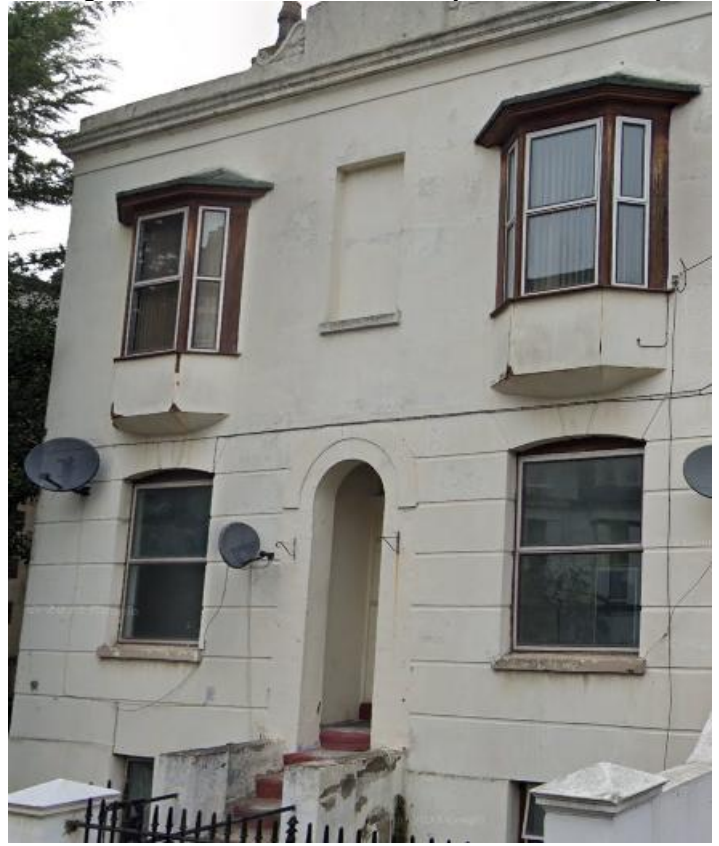


Figure 5.14: No's 37 to 41 Cobham Street (November 2022)



- 5.19 Whilst the appraisal notes that the loss of original sash windows is a negative aspect to Cobham Street the fact remains that in the 15 years since adoption nothing has

been secured to see the replacement of the unsympathetic windows that existed as at the time of its adoption, save for the single application at 37A Cobham Street.

- 5.20 Using the 2022 imagery it is relevant to note that the assessment of each property is set out below regarding the window materials to demonstrate the wider character and appearance of Cobham Street.

Table 5.1 – Summary of windows within Cobham Street

Material	Type	Properties
PVCu	Casement	1, 6, 7, 11, 12, 16, 18, 19, 24, 30, 33, 34, 38, 41, 48, 49, 56
Timber	Sash	2, 3, 8, 9, 10, 17, 20, 21, 22, 23, 25, 26, 28, 29, 31, 32, 35, 43, 44, 45, 50, 51, 52, 53, 54, 56, 57
PVCu & Timber	Casement	4
Timber & Aluminium	Sash & Casement	5
PVCu & Timber	Casement & Sash	13, 27, 37, 39, 47
Aluminium	Aluminium	36, 38, 42, 58
Timber	Casement	40

- 5.21 It is therefore evident that only 27 of the current properties have original timber sash windows to all floors of the property, the remaining properties have a mix of window materials and styles.
- 5.22 Whilst every application is to be considered on its merits the fact remains that the character of the Conservation Area is therefore one that contains a variety of window forms and styles which have not changed over the last 16 years (from the 2008 images) or 15 years post adoption of the appraisal. The introduction of the PVCu windows to the application site therefore do not result in a level of harm that can be considered anything more than less than substantial, and that being at the lower end as well (that being the paragraph 215 test).
- 5.23 This approach to considering impact on the overall character and appearance of a Conservation Area has recently been tested on appeal in relation to proposals for replacement PVCu windows to Milton Hall (ref: APP/K2230/W/24/3348786 and included as **Appendix 1**). That case sought permission to replace windows that were non-original to the building fabric with modern replacements. The inspector had to consider the wider setting of the conservation area and makeup of the windows, noting at paragraph 6 that:

“I acknowledge the Council's concerns in this regard, and fully support the Authority's aims in seeking to preserve the character and appearance of the designated CA; in most cases the use of modern materials can be harmful to the overall appearance of an individual building and hence the wider CA.”

5.24 They then noted at paragraph 7 that:

“However, notwithstanding these comments, although many buildings may have retained their original features, I saw that number of properties within the vicinity of the appeal site have also been fitted with UPVC windows, for example to the building on the opposite side of South Street. The fact that the appeal building is detached from the adjacent units to the south by external steps, and its north wall is a secondary elevation facing out towards a side street, also helps to make the impact of the scheme less discernible.” [my emphasis added]

5.25 It then continued at paragraph 8:

“Moreover, I am informed that the four windows are not original, having been installed in the recesses, which themselves have been altered and infilled, all under application 20040958. As such I appreciate that the scheme would not result in the loss of original openings, as these are not original features on the former Milton Hall. With this combination of factors this in mind, and given their unfussy appearance, I consider that on balance the design of the windows and door and their materials would preserve the character of the CA. Consequently no harm would result to its significance as a heritage asset.” [my emphasis added]

5.26 It is of course relevant to note that this appeal had a different context being non-original windows and being on a flank elevation. However, what remains true is that the Inspector had regard to the wider conservation area character and existence of numerous examples of modern windows and therefore came to the conclusion in paragraph 9 that:

“I conclude that the proposal would not cause material harm to the character and appearance of the host building and surrounds, including the CA. It would comply with the requirements of Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014) and saved Policy TC3 of the Gravesham Local Plan First Review (1994). Together these seek to ensure proposals relate to surrounding development, meet high standards of design, and protect the character of conservation areas. The appeal scheme would also be consistent with the National Planning Policy Framework, which states that good design is a key aspect of sustainability and requires new development to make a positive contribution to local character and distinctiveness.” [my emphasis added]

5.27 The mere fact that this application proposes retention of modern replacement windows is not sufficient to demonstrate in principle that the scheme would be unacceptable

and contrary to adopted development plan policy, instead a more robust assessment of the current character of the conservation area is required to determine whether this scheme on its own would cause harm. Given the assessment undertaken by a Planning Inspector recently under similar circumstances we would suggest that no clear harm can be identified to warrant a refusal on conservation grounds alone.

- 5.28 However, even if harm were to be identified it is necessary to consider whether and public benefits arise from the proposal and if so how those ought to be weighed against the harm.

Other material considerations (public benefits)

- 5.29 One of the main benefits of the proposal is the health benefit. The proposed modern PVCu windows will be far more successful at preventing damp and mould formation indoors. Untreated excess moisture can turn into black mould, which can release dangerous toxins that are harmful to humans and has an unpleasant odour. When more severe, condensation and mould can structurally affect walls, or soak into wallpaper, paintwork, and furniture.
- 5.30 An additional benefit of the proposals are the security benefits. The proposed PVCu windows will help residents feel more secure as the PVCu windows appear less flimsy; the fixings appear sturdier and give a better perception of security for them compared to timber.
- 5.31 The proposed PVCu windows are more energy efficient than the existing timber ones, being made to current standards rather than those which applied when the existing windows were installed 25 years ago. Old single-glazed windows can have U-Values of around 5.8 W/m²K, and older double-glazed windows can be around 2.8. U-Values today are now much lower, with a good U-Value for replacement windows sitting below 1.6 W/m²K.
- 5.32 Typically, modern windows feature a sealed gap between each pane of glazing that is filled with gas, usually argon gas. Argon gas is a suitable element for the job as it is thick, and therefore acts as an effective thermal barrier. While the argon gas layer is intact, the added thermal resistance reduces the amount of heat that escapes from indoors. The seals on the existing timber windows are failing. When the seal in a double-glazed window fails to seal properly, the argon gas between the panels will escape. When this happens, the energy efficiency of a building drops substantially. More obviously, broken window seals can also make accommodation less energy

efficient as heat from your home is lost through open gaps. New PVCu windows at Milton Hall would help to maximise thermal insulation for the residents.

- 5.33 Modern PVCu windows are a sustainable option. PVCu windows can be recycled over and over again, without any deterioration in performance. On the basis that most PVCu windows are now recycled they represent an environmentally friendly choice.
- 5.34 It is accepted that both Timber and PVCu windows can achieve similar results by the way of U-Value and security. However, where PVCu has the advantage over timber is a lower initial cost for achieving any given specification. Additionally, following their fitting and during the lifetime of the product, PVCu window frames require very little upkeep compared to timber frames.
- 5.35 Timber windows require a lot of maintenance. They need far more upkeep, including being painted periodically, and regular checking over than PVCu windows. As timber is a natural material it is prone to movement in different climate conditions. It's not uncommon for timber window frames to shrink, swell, crack, or bend over time.

Planning Balance

Section 6

- 6.1 This application seeks retrospective planning permission to replace the ground and first floor front windows at 27 Cobham Street with replacement PVCu windows.
- 6.2 The replacement windows would replicate the form and method of opening of the existing windows. The replacement windows would be white, which is the same colour as the existing windows. There would therefore be a very minimal visual difference between the existing and proposed windows. While there would be a minor increase in the thickness of the window frames, when seen in the context of the whole elevation, the change would not be perceivable in local or glimpsed views, and only discernible at close range.
- 6.3 PVCu windows are an existing characteristic of the local area. As such, the proposed replacement windows will have a neutral effect on the character and appearance of this part of the Darnley Street Conservation Area.
- 6.4 The proposals meet all the relevant national and local planning policies and would help the Council to achieve its climate change priorities. Tetlow King Planning is therefore of the view that planning permission should be granted for the proposals.

Appendix 1

Appeal ref: APP/K2230/W/24/3348786



Appeal Decision

Site visit made on 4 December 2024

by C Hall BSc MPhil MRTPI

an Inspector appointed by the Secretary of State

Decision date: 09 December 2024

Appeal Ref: APP/K2230/W/24/3348786

Former Milton Hall, 62 Windmill Street, Gravesend, Kent DA12 1BJ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Quota Ltd against the decision of Gravesend Borough Council.
 - The application reference is 20231294.
 - The proposed development is for the replacement of windows and doors to the north elevation.
-

Decision

1. The appeal is allowed and planning permission is granted for the replacement of windows and doors to the north elevation at Former Milton Hall, 62 Windmill Street, Gravesend DA12 1BJ in accordance with the terms of the application, reference 20231294, subject to the following conditions:

1) The development hereby permitted shall begin not later than 3 years from the date of this decision.

2) The development hereby permitted shall be carried out in accordance with the following approved plans: Location plan, 23-1433-10A, 23-1433-11, 23-1433-12, 23-1433-13, window brochure.

Main Issue

2. The main issue is the impact of the proposals on the character and appearance of the host building and surrounds, including the Upper Windmill Street Conservation Area (CA).

Reasons

3. The appeal site comprises the former Milton Hall, a detached building on the junction between Windmill Street and South Street. Being in the CA, I have applied the statutory duty in Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paid special attention to the desirability of preserving or enhancing the character or appearance of the CA by attaching considerable importance and weight to that desirability.
 4. The special architectural and historic interest of the CA derives from buildings principally laid out during the first half of the 19th century, typically of 2-4 storeys in height, some of which are raised above a basement. They are characterised by the use of stock brick, stucco and sash windows, with references to the Classical style. The land rises gradually along the length of Windmill Street to Windmill Hill in the south, with vistas encompassing an aspect of terraces and villas gently climbing up the slopes of the hill.
-

5. The Council's Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020) states that applications to replace traditional vertical sliding timber windows with standard uPVC units will be refused. The Authority contends that the development is therefore unacceptable as the proposed design and materials would be completely unauthentic and unsympathetic to the age and style of this building.
6. I acknowledge the Council's concerns in this regard, and fully support the Authority's aims in seeking to preserve the character and appearance of the designated CA; in most cases the use of modern materials can be harmful to the overall appearance of an individual building and hence the wider CA.
7. However, notwithstanding these comments, although many buildings may have retained their original features, I saw that number of properties within the vicinity of the appeal site have also been fitted with UPVC windows, for example to the building on the opposite side of South Street. The fact that the appeal building is detached from the adjacent units to the south by external steps, and its north wall is a secondary elevation facing out towards a side street, also helps to make the impact of the scheme less discernible.
8. Moreover, I am informed that the four windows are not original, having been installed in the recesses, which themselves have been altered and infilled, all under application 20040958. As such I appreciate that the scheme would not result in the loss of original openings, as these are not original features on the former Milton Hall. With this combination of factors this in mind, and given their unfussy appearance, I consider that on balance the design of the windows and door and their materials would preserve the character of the CA. Consequently no harm would result to its significance as a heritage asset.
9. I conclude that the proposal would not cause material harm to the character and appearance of the host building and surrounds, including the CA. It would comply with the requirements of Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014) and saved Policy TC3 of the Gravesham Local Plan First Review (1994). Together these seek to ensure proposals relate to surrounding development, meet high standards of design, and protect the character of conservation areas. The appeal scheme would also be consistent with the National Planning Policy Framework, which states that good design is a key aspect of sustainability and requires new development to make a positive contribution to local character and distinctiveness.

Conditions

10. I have considered the imposition of conditions in light of advice in Planning Policy Guidance and the Framework. In addition to the standard implementation condition, the approved plans are listed for certainty.

Conclusion

11. For the reasons given, and having regard to all matters, the appeal is allowed.

C Hall

INSPECTOR