

Delegated Report

Householder Planning Application

Planning Application No: 20250169

Location: 19 Berkley Road Gravesend Kent DA12 2EU

Description: Replacement PVCu Windows to front and rear elevations in white with Astragal Bars and Replacement door in Black Composite and Black PVCu frame.

Applicant: Ms Sarah Swan

Site Visit Date: 7th April 2025

Submitted Documents/Plans

Planning Application Form;
Conservation Area and Heritage, Design and Access Statement;
Site Location Plan;
Drawing No. GB10068 – Existing Front Elevation;
Drawing No. GB10069 – Existing Rear Elevation;
Drawing No. GB10070 – Proposed Front Elevation;
Drawing No. GB10071 – Proposed Rear Elevation;
Drawing No. GB10072 – Proposed Window and Door Details;
Drawing No. GB10073 – Proposed Window Details Front;
Drawing No. GB10074 – Proposed Window and Rear French Door;
Photos

Relevant Planning History

None.

Development Plan

Gravesham Local Plan Core Strategy (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)

- 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.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- King 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)
- Design for Gravesham – Design Code (2024)

Other Relevant Guidance

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

Consultations, Publicity and Representations

Consultees

GBC – Conservation Officer

The Article 4 Direction preserves original features that contribute to the appearance of the conservation area and offers the opportunity to enhance the appearance of the conservation area. The existing ground floor front arched timber sash window is original and should be retained. The front upper windows are uPVC and where such windows are to be replaced we would accept windows that replicate the original such as those at number 10, 11, 12, 13, 23 (looking at Google Street View December 2020). In this instance we have accepted replacement of uPVC window with windows from [Roseview Ultimate](#) because they are the most accurate replication of the timber sash window with a narrow meeting rail. There are very few original doors that survive in the road. The proposed replacement door is not an original pattern or material and should be timber two panelled to match the original doors at number 10 Berkley Road and 21 Wilfred Street. In time, with a consistent approach to window and door replacement, the conservation area will undergo enhancement, which is the objective of the Article 4 Direction.

For the above reasons the proposals are contrary to local and nation policy and cannot be supported.

Neighbouring properties

The application was advertised on site and in the newspaper and individual letters sent to 8 surrounding properties were consulted with an overall expiry of date of 4th April 2025. No comments have been received.

Officer's Analysis

Design, Character and Appearance

The application site consists of a two storey terraced dwelling situated in the King Street Conservation Area and covered by an Article 4 Direction (Art 98/1).

The proposal is for *Replacement PVCu Windows to front and rear elevations in white with Astragal Bars and Replacement door in Black Composite and Black PVCu frame.*

The principal issue in the determination of this application is whether the windows and doors proposed would preserve or enhance the character or appearance of the King Street Conservation Area.

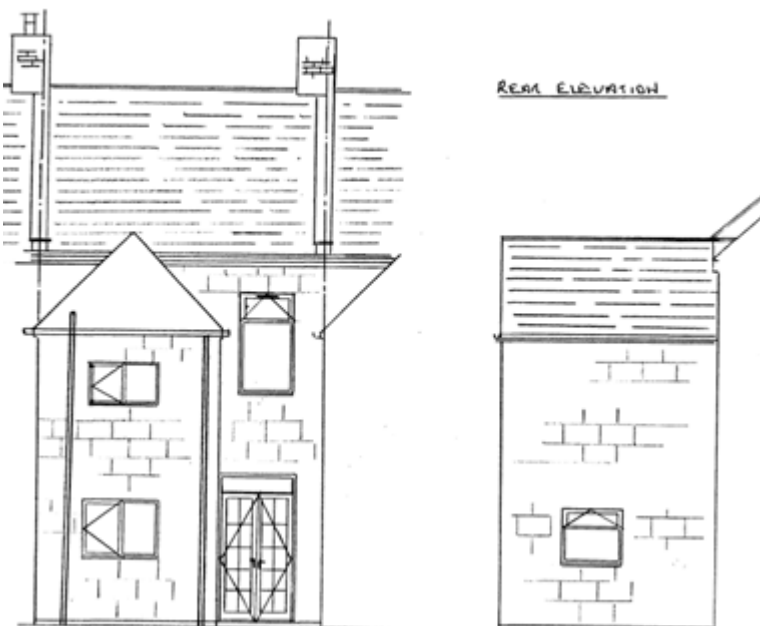
Existing Property Front



As can be seen from the above images, the ground floor front window is original timber sash. The first floor front windows and windows and doors in the rear elevation are uPVC.

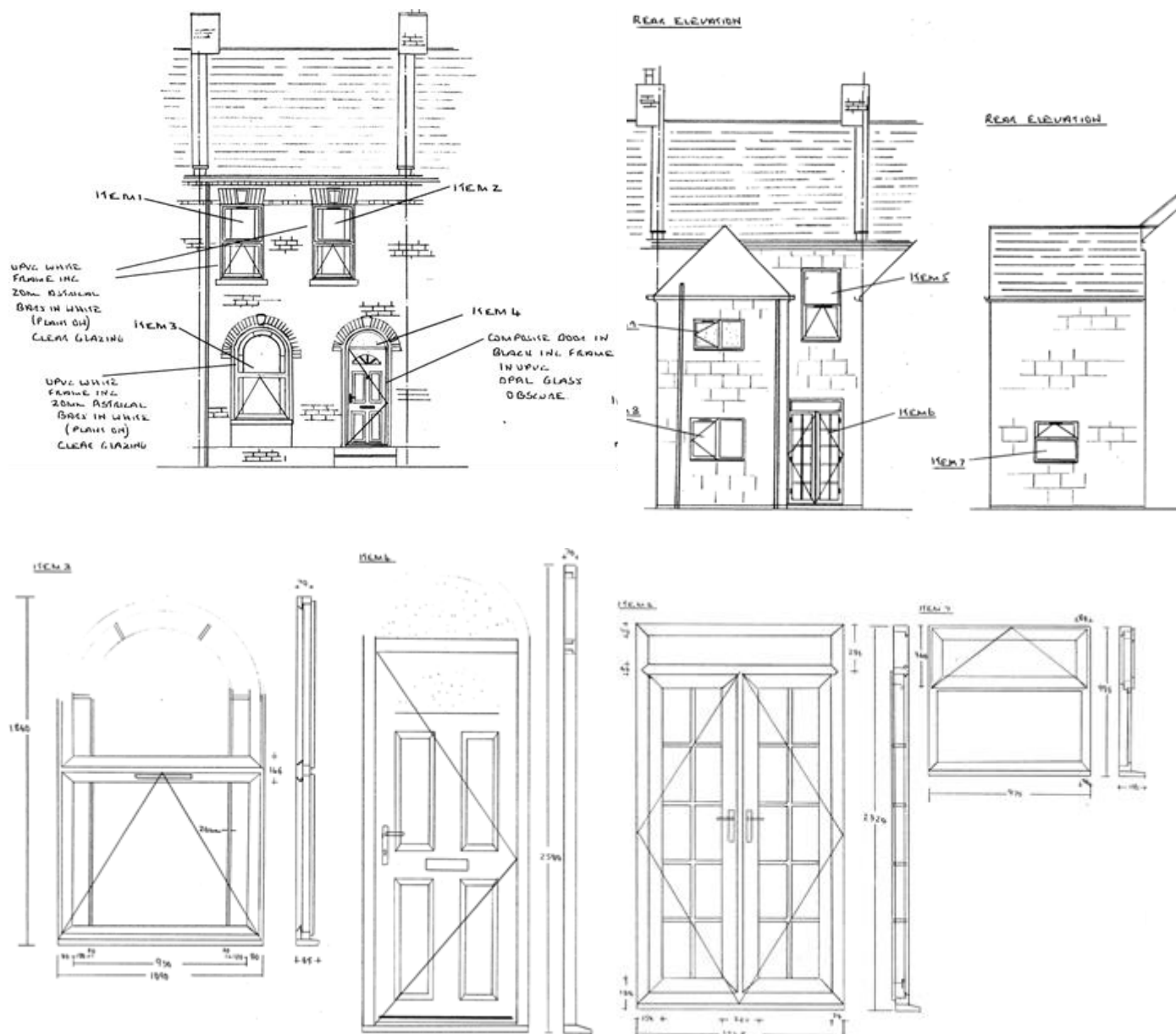
Existing Rear Elevation

REAR ELEVATION



The proposed windows and doors are uPVC double glazed windows and composite front door, as seen in the below plan:

Proposed Windows / Doors



The Council's Conservation Areas Maintenance/Replacement Windows and Doors Guidance 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 Crittal 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. 5 as it is an application for uPVC standard units as Replacements. The guidance given is that in such cases these applications should be refused.

As stated, the existing ground floor front window is original/period fabric sliding sash windows and is elegant and fine proportions with single glazing. Therefore it's replacement with a standard uPVC unit would be unacceptable and contrary to Policies CS19 and CS20 (LPCS), saved Policy TC3 (LPFR) and section 16 (NPPF, 2024).

The first floor windows and the rear windows and doors are modern uPVC replacements and overall the principle of their replacement is acceptable, subject to design. Whilst the existing uPVC windows appear to be standard uPVC units, an application for their replacement would present an opportunity to secure a design that would be more fitting of the period and original window design of the property, such as uPVC vertical sliding sash windows. It is important to note that the replacement of the windows on the rear elevation would not require consent and so are of a lesser concern. However the windows on the front elevation are significant.

The existing uPVC windows and the proposed replacement windows are of chunkier proportions when compared to the original/period fabric windows as evident from the thickness and depth of the meeting rail, frame and glazing bars which is due to the use of uPVC rather than timber. The windows lack the finesse of the original/period windows. The spacer bar due to the double glazing is another jarring

feature adding to the unacceptability of the detail of the windows.

The replacement windows in terms of being plastic, of thicker proportions, double glazing and a lack of finesse compared to the existing ground floor front window and the original/period fabric windows that have been historically removed would not preserve or enhance the character or appearance of the King Street Conservation Area but will cause further harm to it.

It is stated in the Heritage Statement that the existing windows and doors have now become very inefficient and draughty and beyond economical repair. As already stated, the replacement of the existing uPVC windows is principally acceptable, however the local authority would like to see uPVC vertical sliding sash windows to reflect the original design of the property. With regard to the original ground floor timber sash window, this window does not appear to be in a state of disrepair and from the officer site photos, appeared to be well preserved. 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.

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 proposed replacement door is also not considered appropriate both in terms of it's design and material and would fail to preserve or enhance the conservation area setting.

The applicant's 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 proposed with relation to the replacement of the existing uPVC windows are not the only option to address this matter. The replacement of the original timber sash window with the proposed windows is also not the only option; should it have been able to have been demonstrated that this window is wholly beyond repair. Its replacement with timber slim-lite sliding sash windows would could potentially address the matter of condition.

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

Any Other Material Planning Considerations

None.

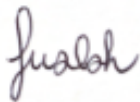
Conclusion

The proposed replacement windows and doors, most notably on the front elevation, by virtue of their material, design and detailing fail to preserve or enhance the character or appearance of the King Street Conservation Area and 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, 2024).

Recommendation

Refusal

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

Case Officer:	Ms Amanda Cue	Team Leader:	Mrs Faye Walsh
Signed:	<i>A Cue</i>	Signed:	
Dated:	9th May 2025	Dated:	09 May 2025