

Your ref 20260015

Filborough Farm , Lower Higham Road, Gravesend, Kent DA12 2NY

Repairs to timber windows to the front and side elevations including splicing in matching timber to frames. Replacement of windows to rear elevation with uPVC frames of the same design and profile as the existing windows, demolition of an internal wall between the kitchen and WC and kitchen and pantry with bricking up of the door opening to the toilet. Rewiring of the house. Removal of the existing bathroom suite and replacing with a new bathroom suite.

Dear Ms Harrison

Thank you for notifying the SPAB of the above application affecting this 18th-century Grade II listed building. Having carefully reviewed the submitted documents, we have a number of concerns and wish to register our objection for the following reasons.

The Heritage Statement (HS) identifies the farmhouse as 18th century and describes it as a medieval hall house partly rebuilt following a fire in 1938. However, this is the only description of the building's age, significance, and the fabric that would be affected by the proposals. Crucially, there is no meaningful assessment of the impact the proposed works would have on the building's special architectural and historic interest.

The HS also implies that only works affecting the external visual impact have the potential to affect significance. This is incorrect. Internal works, alterations to historic openings, changes to joinery, and any interventions affecting historic fabric or plan form are equally relevant to the assessment of significance. Therefore, if further internal alterations are proposed—such as thermal upgrades, changes to doors and windows, or works to floors, walls, or ceiling finishes—full details must be provided. Without this information, it is not possible to understand how the proposed works would affect the building's significance. The involvement of a conservation-accredited architect in preparing the specification is strongly recommended.

We are pleased to see that repairs to the windows on the front elevation are proposed. However, we strongly object to the replacement of remaining windows with uPVC. The use of uPVC is not appropriate for a building of this age, significance, and construction. Medieval hall houses are highly sensitive heritage assets whose character derives from historic fabric, traditional joinery, and craftsmanship. uPVC, as a modern and non-traditional material, would introduce a visually and physically intrusive element and would not preserve—or enhance—the building's special architectural and historic interest. If the existing windows are beyond repair, they should be replaced with timber frames. This may present an opportunity to incorporate slimline or vacuum double glazing, though these must be carefully detailed to minimise harm.

Similarly, we do not support the introduction of a uPVC door, even if the existing door is of modern date, for the reasons outlined above.

With regard to the removal of the partition between the kitchen and the toilet, the HS provides little assessment of the 1938 rebuilding works. Although later, these interventions form part of the building's historic development and may contribute to its evidential and architectural interest. Later phases must therefore be assessed alongside earlier fabric, and their significance properly understood before decisions regarding alteration or removal are made.

For the reasons outlined above, we advise that the application fails to meet the requirements of the National Planning Policy Framework (NPPF). We draw attention to the following paragraphs:

Paragraph 207 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

Paragraph 212 of the NPPF indicates that when considering the impact of a proposed development upon the significance of a designated heritage asset, great weight should be given to the asset's conservation.

Paragraph 213 of the NPPF states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

In light of the above, we recommend that this application is withdrawn, and the additional information provided following the comments above. We would be happy to look at these proposals again once they have been revised.

If this information is not forthcoming, we recommend that permission is refused.