Gravesham Borough Council

Delegated Report

Planning and Listed Building Consent Applications

Planning Application No: 20260014
20260015

Location: Filborough Farm Lower Higham Road Gravesend Kent

Description: 20260014 - Repairs to timber windows to the front and side elevations including splicing in matching timber to frames; replacement of windows to rear elevation with timber, single glazed windows of the same design and profile as the existing windows; rewiring of the house and removal of the existing bathroom suite and installation of replacement bathroom suite.

20260015 - Application for Listed Building Consent for repairs to the front and side elevations including splicing in matching timber to frames; replacement of windows to rear elevation with timber, single glazed windows of the same design and profile as the existing windows; rewiring of the house and removal of the existing bathroom suite and installation of replacement bathroom suite.

Applicant: Mr J Bungar

Site Visit Date: Desktop

Submitted Documents/Plans

Application form;
Revised Planning, Design and Access Statement;
Revised Heritage Statement;
Drawing no. 25/493/02 – Existing house plans and elevations;
Drawing no. 25/493/09 – Existing and proposed house site plan;
Drawing no. 25/493/05 – Proposed replacement windows sections details;
Drawing no. 25/493/07 Rev. A – Proposed house kitchen; and
Drawing no. 25/493/04 Rev. A – Proposed replacement windows.

<u>Superseded</u>

- ~~Cover Letter;~~
- ~~Application form;~~
- ~~Drawing no. 25/493/07 – Proposed house kitchen;~~
- ~~Drawing no. 25/493/04 – Proposed replacement windows;~~
- ~~Planning, Design and Access Statement; and~~
- ~~Heritage Statement.~~

Relevant Planning History

Reference	Description	Decision	Decision Date

20000677	The replacement of the two windows at ground floor and one at first floor level on the west elevation, one window at ground floor and two at first floor level on the north elevation and two windows at ground floor and three at first floor level on the south elevation and painting of the exterior stonework on the north and east elevations with white Sandtex exterior paint.	Permitted	14.11.2000

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS12 – Green Infrastructure
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)
TC2 – Listed Buildings

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.

Other material considerations

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses when considering whether to grant listed building consent.

Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended, the Council has a statutory duty in considering whether to grant planning permission for development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of special architect or historic interest which it possesses.

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

- Conservation Areas Maintenance/Replacement Windows and Doors Guidance Supplementary Planning Document (2020)

Informal Guidance

- Historic England Traditional Windows: Their Care, Repair and Upgrading (2017)
- Historic England Adapting Historic Buildings for Energy and Carbon Efficiency; Advice Note 18 (2026)

- (IHBC) *Guidance on Alterations to Listed Buildings*
- GBC Listed Buildings A guide for owners and occupiers

Consultations, Publicity and Representations

Consultees

The Georgian Group

Thank you for consulting the Georgian Group on the above application for Listed Building Consent.

The Group wish to object to the proposed introduction of uPVC window frames to the Grade II listed farmhouse.

While the existing windows are not original to the building, this does not justify their replacement with uPVC. Historic England guidance is clear that uPVC windows are generally inappropriate for listed buildings. *Traditional Windows: Their Care, Repair and Upgrading* states that *"the different appearance and character of PVC-u windows compared to historic windows is highly likely to make them unsuitable for older buildings, particularly those that are listed or in conservation areas"* and that such windows *"cannot match the sections and proportions of historic joinery."*

The proposed introduction of uPVC windows would therefore result in harm to the special architectural and historic interest of the listed building.

This position is reinforced by the Institute of Historic Building Conservation (IHBC) *Guidance on Alterations to Listed Buildings*, which states that *"if substitute materials are used, they should have similar properties to the historic materials, be compatible in appearance, and be proven to be durable."* uPVC does not meet these criteria.

The proposal also conflicts with national planning policy. Paragraph 202 of the National Planning Policy Framework confirms that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance. Paragraph 212 requires that *great weight* be given to the conservation of designated heritage assets, irrespective of the level of harm, and paragraph 213 states that any harm to their significance must be clearly and convincingly justified.

The proposal would therefore fail to preserve the character of the listed building, contrary to the statutory duties under sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

For these reasons, the proposed installation of uPVC windows is not supported in principle and should be resisted.

Society for the Protection of Ancient Buildings (SPAB)

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.

<u>No response from</u>:

- GBC Conservation Officer

<u>Neighbouring properties</u>

20260014 – 2 neighbouring properties were consulted plus site and press notices – overall consultation expiry date was 13.02.2026 – no responses received.

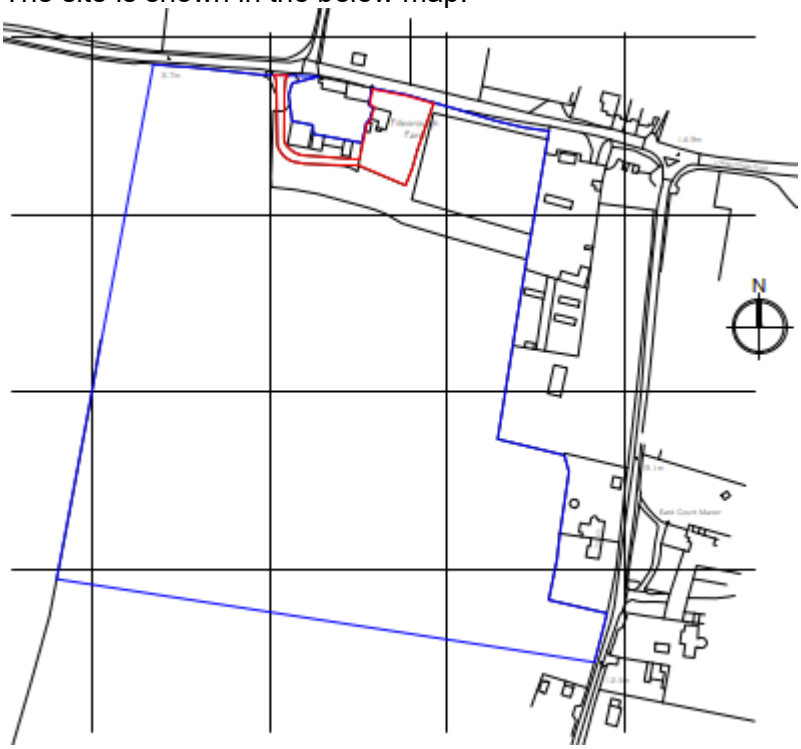
20260015 – Advertised by way of site and press notices - overall consultation expiry date was 13.02.2026 – no responses received.

Officer's Analysis

The application site consists of a two storey detached dwelling situated on the southern side of Lower Higham Road to the west of Church Lane. It is set back from the road and Filborough Farm Barn is directly to the west.

Filborough Farm is a grade II listed building, as is Filborough Farm Barn and the site is located in the Green Belt and in the Higham Arable Farmlands Landscape Character Area.

The site is shown in the below map:



The site is seen in its wider context in the below aerial image:

The site is seen below with Filborough Farm Barn to the right:

A close up view of the front of Filborough Farm:

A view of the rear elevation:

A view of the side elevation:

The proposal as originally submitted was for the ‘repair of the windows in the front and side elevations, replacement of the timber windows and door in the rear elevation with uPVC double glazed windows and door, removal of an internal wall between the kitchen and toilet and larder and bricking up of door opening to the toilet and installation of replacement bathroom suite’.

The agent was advised that the replacement of the existing timber windows and door with uPVC double glazed windows and door would be completely unacceptable as it would cause harm to the special interest of this listed building. They were also advised that the removal of the internal wall would need much more detailed analysis from them in the Heritage Statement before a decision could be made on whether its removal would be acceptable as although not original it was still period fabric and part of the history of the building.

In response, the agent confirmed that they will now leave the wall between the kitchen and the larder and WC and leave the windows in the wall that serves the pantry and the larder and have submitted a revised drawing showing these elements retained. They also confirm that they now propose to replace the windows in the rear elevation with timber single glazed windows to match the existing and door is not to be replaced. They advise that the drawing which had been submitted originally showing the window profiles showed the current timber single glazed windows and the proposed timber single glazed windows are to match these.

To be clear therefore the proposal under consideration is now for ‘Repairs to timber windows to the front and side elevations including splicing in matching timber to frames; replacement of windows to rear elevation with timber, single glazed windows of the same design and profile as the existing windows; rewiring of the house and removal of the existing bathroom suite and installation of replacement bathroom suite’.

The principle issue in the consideration of this application is the impact of the proposal on the architectural and historic interest of this grade II listed building.

In respect of the proposal there are various elements which will be discussed in turn as follows.

Repair of the windows in the front and side elevations

These are not the original windows, with new windows being installed following the granting of Listed Building Consent under ref. 20000677 for the replacement of the two windows at ground floor and one at first floor level on the west elevation, one window at ground floor and two at first floor level on the north elevation and two windows at ground floor and three at first floor level on the south elevation and painting of the exterior stonework on the north and east elevations with white Sandtex exterior paint. The repair proposed are for splicing in with matching timber; the windows show disrepair and their repair is therefore most welcome.

Replacement of the timber windows in the rear elevation with timber, single glazed windows to match the existing

The proposal is to replace the existing timber windows (permitted under ref. 20000677) with timber single glazed windows which would match the existing windows.

The removal of the existing windows in the rear elevation is acceptable as they are not the originals or period fabric and are modern replacements from the 20000677 listed building consent. The replacement windows would be timber, single glazed casements which would match the design and profile of the existing windows. The window details have been submitted of the existing windows and the proposed windows are to match this.

On the basis that it is now proposed to replace the existing timber single glazed casement windows in the rear elevation with timber single glazed casement windows to match the existing windows, then this is considered an acceptable proposal which would not harm the special interest of this listed building or the setting of Filborough Farm Barn which is also grade II listed.

The Georgian Group & SPAB objected to the proposed uPVC windows and door in the rear elevation but now this is no longer proposed and the proposal is now for timber single glazed replacement windows in the rear elevation, their objection in respect of this has been addressed and therefore it is not necessary to re-consult them.

Removal of the existing bathroom suite and installation of replacement suite

The first floor bathroom is to be fitted with a new bathroom suite as the current suite is said to be dated. No changes are proposed to the building fabric, pipe runs or drainage are required; the existing bathroom is to be used it is just the suite is to be replaced. Given this, the proposed replacement bathroom suite is acceptable and no harm would be caused to the special interest of this listed building.

Rewiring

The use of existing positions as well as under floors, ceilings and roof voids is welcome. It is stated that the proposal for wiring running in walls is to feed them through lathe and plaster walls where possible in a careful and planned way to minimise damage. It is stated that studs can be detected with a stud finder and by using fish tape or rods to feed cable through and flexible drill bits to create an opening in a horizontal stud with wiring to be run in lathe and plaster walls. Switches and plug sockets are said to be needed to be surface mounted on lathe and plaster walls. Given that the wiring will be discreetly hidden behind floors, ceilings and roof voids, this is considered the most sympathetic way for the wiring to be located and as such it would cause no harm to the special interest of this grade II listed building.

In summary, the proposed repairs to the timber windows to the front and side elevations including splicing in matching timber to frames; replacement of windows to rear elevation with timber, single glazed windows of the same design and profile as the existing windows; rewiring of the house and removal of the existing bathroom suite and installation of replacement bathroom suite would not be harmful to the special interest of this grade II listed building or the setting of the grade II listed Filborough Farm Barn. As such the

proposal would be compliant with Policies CS19 & CS20 (LPCS), saved Policy TC2 (LPFR) and sections 12 & 16 of the NPPF (2024).

Other

Whether inappropriate development in the Green Belt & impact on openness

The site is in the Green Belt but given the nature of the proposal which is for internal alterations and repair and replacement of windows, it would be covered under exemption (c) of 154 as it would be an alteration which would not result in a disproportionate addition over and above the size of the original building. Given the nature of the proposed works they would also have no impact on the openness of the Green Belt. As such in respect of Green Belt the proposal is considered compliant with Policy CS02 (LPCS).

Landscape Character

Given the nature of the proposals they would not have an impact on the wider landscape character. As such in respect of landscape character the proposal is considered compliant with Policy CS12 (LPCS).

Neighbouring Amenity

Given the nature of the proposals there would be no impact on the amenity of any neighbouring properties. As such in respect of neighbouring amenity the proposal is considered compliant with Policy CS02 (LPCS).

Any Other Material Planning Considerations

None.

Conclusion

The proposed repairs to the timber windows to the front and side elevations including splicing in matching timber to frames; replacement of windows to rear elevation with timber, single glazed windows of the same design and profile as the existing windows; rewiring of the house and removal of the existing bathroom suite and installation of replacement bathroom suite would not be harmful to the special interest of this grade II listed building or the setting of the grade II listed Filborough Farm Barn. As such the proposal would be compliant with Policies CS19 & CS20 (LPCS), saved Policy TC2 (LPFR) and sections 12 & 16 of the NPPF (2024).

Recommendation

20260014 – Permission
20260015 – Permission

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

Case Officer:	Ms Rebecca Harrison	**Team Leader:**	**Richard Hart**
Signed:	*Rebecca Harrison*	**Signed:**	*R Hart*
Dated:	15 April 2026	**Dated:**	**15th April 2025**