



Appeal Decision

Site visit made on 15 August 2025 by A Conteh

Decision by L McKay MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 8th October 2025

Appeal Ref: APP/K2230/D/25/3366463

19 Berkley Road, Gravesend, Kent, DA12 2EU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Ms Sarah Swan against the decision of Gravesham Borough Council.
 - The application Ref is 20250169.
 - The development proposed is replacement PVCu Windows to front and rear elevations in white with astragal bars and replacement door in black composite and black PVCu frame.
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Decision

1. The appeal is dismissed insofar as it relates to the ground floor replacement PVCu window to front elevation labelled as Item 3 on drawings GB10070 and GB10072, and replacement door shown as Item 4 on drawings GB10070 and GB10072.
2. The appeal is allowed insofar as it relates to the replacement PVCu windows on the front elevation at first floor and on the rear elevation (labelled Item 1, Item 2, Item 5, Item 6, Item 8, Item 9 on the approved plans), at 19 Berkley Road, Gravesend, DA12 2EU in accordance with the terms of the application, Ref 20250169, and the plans submitted with it, so far as relevant to that part of the development hereby permitted and subject to the following conditions:
 - 1) The development hereby permitted shall begin not later than three years from the date of this decision.
 - 2) The development hereby permitted shall be carried out in accordance with drawing nos GB10070, GB10071, GB10073 and GB10074 except in respect of Item 3 and Item 4 shown on plan GB10070.

Appeal Procedure

3. The site visit was undertaken by a representative of the Inspector whose recommendation is set out below and to which the Inspector has had regard before deciding the appeal.

Applications for costs

4. An application for costs was made by Ms Sarah Swan against Gravesham Borough Council. That application is the subject of a separate decision.

Main Issue

5. The effect of the proposed development on the character and appearance of the King Street Conservation Area (KSCA)

Reasons for the Recommendation

6. The appeal scheme affects a property situated in a conservation area and therefore I have had special regard to Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
7. The King Street Conservation Area Character Appraisal 2009 (CACA) sets out the special historic and architectural interest of the KSCA. It notes that Berkley Road, Bernard Street and Wilfred Street form a self-contained residential area characterised by two-storey terraced houses with distinctive architectural features, including round-headed timber sash windows and timber doors. These features contribute to the overall significance of the KSCA.
8. During my visit to the appeal site and its surroundings, I observed visual cohesion in some architectural details and variations in others, most notably the design of windows and doors. A mixed palette of materials can be seen with the widespread use of uPVC windows and a number of uPVC doors, creating a mix between traditional timber and modern materials. Nevertheless, where original features remain, these make a distinct positive contribution to the character and appearance of the KSCA.
9. Currently, the appeal site is one of the few properties in this residential area that exhibits the original timber sash window which is a key characteristic of this part of the KSCA, and which contributes to its significance. The front door does not appear to be original, as it has a different panel arrangement to those identified as original by the Council. However, it has a traditional design and the painted timber is characteristic of the KSCA, so it makes a limited positive contribution.
10. The replacement of the round-headed timber sash window with an uPVC alternative would result in the loss of the quality architectural sash feature. The appellant has stated their intention to maintain the window's original appearance through replication of the arched head design and use of astragal glazing bars to imitate the sash element. However, the thickness of the frame and meeting rail between casement windows would cause the development to appear significantly bulkier, ultimately lacking the finesse needed to emulate the original sash design. Furthermore, the casement style opening would be evident from the frame design, and would look markedly different to the traditional sash form. As a result, this part of the proposal would constitute a visually harmful alteration to the appeal property, to the detriment of the character and appearance of the KSCA.
11. My observation of similar developments in the residential area was that their appearance did not resemble the traditional timber sash window but rather produced a unique design, contributing little to the appearance of the KSCA and in many cases detracting from it. The existence of these other examples therefore demonstrates the harmful effects of inappropriate replacements, and does not justify the harm I have identified.
12. The proposal would also involve the replacement of a timber panelled front door with composite material and a uPVC frame. The use of these non-traditional materials, as acknowledged by the CACA, would undermine the historic character of the appeal property. As such, this part of the proposal would cause harm to the appearance of the KSCA.

13. Consequently, despite the varied street character, when assessing this proposal on its own merits, I find that the loss of a quality architectural feature, the round-headed timber sash window, and use of non-traditional materials and design for the proposed door would harm the character and appearance of the KSCA.
14. The proposal would also replace the existing uPVC windows on the upper floor of the front elevation. The use of astragal bars would mean that the proposed window design would appear more consistent with the surrounding context than the current standard uPVC frames, as they would imitate the design of original windows present in the street scene at 11 and 12 Berkley Road. Consequently, this aspect of the proposal would slightly enhance the appeal site's existing positive contribution to the character and appearance of the KSCA.
15. The final component of the proposal involves replacement uPVC windows to the rear elevation. This part of the proposal would have limited visual impact and in that respect would cause no harm to the character and appearance of the KSCA.
16. The acceptability of these elements of the scheme does not however justify the harm that would result from the changes to the round-headed window and front door. Furthermore, the front first-floor windows and rear windows could be replaced separately from the other elements of the scheme, and in such a situation I am able to recommend that a split decision be issued.
17. The appellant's proposed use of non-standard uPVC, openness to discuss minor detailing, and willingness to revise the door design are recognised, however, the extent of alteration likely needed to the submitted plans would make any acceptable design differ materially to the design proposed here. In any case, I cannot consider whether alternative plans which are not before me. Therefore, it would not be reasonable to secure such changes by means of a planning condition.
18. The proposed replacement of the front ground floor window and door would therefore result in harm to the character and appearance of the KSCA as a whole. As the proposal would only affect a small part of the KSCA, the harm to the significance of the heritage asset would be less than substantial, and at the lower end of that scale. Nevertheless, it is a matter to which I give considerable importance and weight. The National Planning Policy Framework (Framework) sets out that such harm should be weighed against the public benefits of the proposal.
19. The appellant indicates that the proposed development would bring about benefits in the form of improving thermal efficiency and energy performance of the property. This would be a public benefit through improving housing stock and responding to climate change. However, there is very little information before me on the extent of this improvement, therefore I can give it very little weight, and it does not outweigh the harm to the significance of the KSCA.
20. Accordingly, the replacement uPVC windows to the upper floor of the front elevation and full rear elevation would not harm the character and appearance of the KSCA and would not conflict with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy (2014) or Saved Policy TC3 of the Gravesham Local Plan First Review (1994) (Saved and Deleted Policies version from September 2014).
21. However, for the reasons above, the proposed replacement to the round-headed sash window and timber door on the front elevation would harm the character and appearance of the KSCA, and this harm would not be outweighed by the public

benefits of the scheme. Consequently, those aspects of the proposal would conflict with Core Strategy Policies CS19 and CS20 and Saved Policy TC3 of the Local Plan, which expect development to be well designed and conserve or enhance the conservation area.

22. Furthermore, these elements would conflict with the Framework heritage policies which give great weight to the conservation of heritage assets. They would also fail to comply with the guidance contained in the CACA.

Other Matters

23. The proposal would contribute to reducing noise pollution and maintenance costs and increasing security for the occupants. These would be private benefits however, and again I have very little information about the extent of such benefits. As a result, I give them very limited weight.
24. The scale of works referred to at Anglo Saxon Building cannot readily be observed from the front elevation and in any case, they do not constitute uncharacteristic development in the conservation area. Furthermore, the nature of the site differs greatly from the surrounding residential area and appeal site and it is not therefore directly comparable to the appeal scheme.
25. The development at 22 Berkley Road for replacement window and doors was approved by the Council, however I have very little information on how and when this decision came to be made, and what was in place previously. In terms of the other examples referred to by the appellant, I do not know when these took place and whether planning permission was required or was granted. Therefore, it has not been demonstrated that the Council has been inconsistent in dealing with these other developments, or that they are comparable to the appeal scheme.
26. Consequently, these matters do not outweigh the harm I have identified.

Conditions

27. In respect of the replacement of the first-floor front windows and the rear windows, conditions relating to the time limit on commencement and carrying out development in accordance with submitted plans are necessary in the interest of certainty.
28. The Council has suggested a condition that would require the appellant to submit details of the windows and doors, including their design, specification, method of opening and finish/colour, for their approval. However, I have these details for the windows that I consider are acceptable. This condition would not be reasonable in relation to the ground floor front window and door, for the reasons set out above.

Conclusion and Recommendation

29. For the reasons given above and having had regard to all other matters raised, I recommend that the appeal should be dismissed insofar as it relates to the front ground floor window and door, and allowed subject to conditions insofar as it relates to the front first floor windows and rear windows.

A Conteh

APPEAL PLANNING OFFICER

Inspector's Decision

30. I have considered all the submitted evidence and my representative's report and agree with the reasoning and recommendation. On that basis the appeal is dismissed in relation to the front ground floor window and door, and allowed in relation to the front first floor windows and rear windows, subject to the conditions set out above.

L McKay

INSPECTOR