

## COMMITTEE REPORT

BY THE DIRECTOR OF ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES  
READING BOROUGH COUNCIL  
PLANNING APPLICATIONS COMMITTEE: 11<sup>th</sup> December 2019

**Ward:** Southcote

**App No.:** 191396/LBC

**Address:** Southcote Lodge, Burghfield Road, Reading, RG30 3NE

**Proposal:** Replacement of existing timber sliding sash windows with new white uPVC double-glazed sliding sash windows within existing window openings in Grade II Listed Building (resubmission of 181469).

**Applicant:** S Holmes, Housing 21

**Date validated:** 23 August 2019

**8 week target decision date:** 18 October 2019

### RECOMMENDATION

Refuse Listed Building Consent for the following reason:

1. The proposed changes would result in substantial harm to the special architectural and historic interest of the Listed Building and features of special interest, notably the windows, contrary to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy contained within the NPPF and associated practice guidance and Policies EN1 and CC7, of the Reading Borough Local Plan 2019.

### INFORMATIVES TO INCLUDE

1. Standard positive and proactive informative.
2. Refused drawings

## 1. INTRODUCTION

- 1.1 Southcote Lodge and garden walls to east and west are Grade II Listed, entry number 1321955. The list description reads as follows:

*"Mid C18, incorporating parts of earlier building. Rectangular main block, 3 1/2 storeys to south, 2 1/2 storeys with flanking 2 storey wings to north. Entrance (north) front: main block silver grey brick with red window dressings. Modern, central dormer. Glazing bar sash windows, 3 on 1st floor and C19 glazed porch across ground floor between wings. Red brick wings projecting 2 windows (blind) in depth and with 1 hipped dormer each and 1 window at north end. Old tile roof. Flanking curved garden walls forming one side of small oval court. South side: originally 5 window front. Now has 5 window mid C19 full height bay to left. Half glazed late C18 door to garden with bracketed hood, stone steps. Interior: a number of good contemporary features (fireplaces and plasterwork, and staircase) retained. A good house and the house of John Blagrave (mathematician). To west is an 8 foot brick wall with chamfered capping about 50 yds long and returned to south along road. Partly C18, see one brick with grafitto "E B 1720"."*

- 1.2 This case was originally on the agenda for 13<sup>th</sup> November Planning Applications Committee. The application was not discussed at that meeting and was deferred instead for a site visit on 5 December.



**Site Location Plan**



**Site Photograph - rear elevation to garden**

## 2. PROPOSAL

- 2.1 Listed Building Consent is sought for the removal of the existing timber sliding sash windows and replacement with uPVC sliding sash windows of similar frame design.

### *Submitted drawings*

0/6474/18-00  
0/6474/18-01  
0/6474/18-02  
0/6474/18-03  
0/6474/18-04  
0/6474/18-05  
0/6474/18-06  
0/6474/18-07  
0/6474/18-08  
0/6474/18-09  
0/6474/18-010  
0/6474/18-11

### *Supporting Documents*

Planning, Design and Access Statement ref. 6474

## 3. RELEVANT PLANNING HISTORY

- 3.1 161486/PRE - Pre-application Enquiry for “Replacement of existing windows with UPVC to match style and existing fenestration”. Observations were sent on 19 January 2017 summarised as: *“The replacement of the existing timber sash windows with new uPVC windows is not considered acceptable and would be likely to be refused Listed Building Consent. It is recommended that refurbishment, weather stripping and/or secondary glazing are considered in order to preserve the special interest of the Listed Building.”*
- 3.2 181469/LBC - Replacement of existing timber sliding sash windows with new white uPVC double glazed sliding sash windows to match in style and size and to be installed into the various existing opening apertures of the Grade II Listed Building. Withdrawn 1 April 2019.

## 4. CONSULTATIONS

### 4.1 RBC Historic Buildings Consultant

The Council’s Historic Buildings Consultant visited the site under recent application 181469/LBC and provided detailed comments at that time. It has been confirmed that these remain valid and are incorporated into the appraisal section of this report. The conclusion is *“Refusal is recommended for this application as the proposed changes would be substantially harmful to the special architectural and historic interest of the Listed Buildings and features of special interest, notably the windows. This would be contrary to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the planning policy in the NPPF, the PPG and Reading Borough Planning Policies.”*

### 4.2 Public consultation:

Letters were sent to addresses surrounding the site. A site notice was displayed on Burghfield Road opposite the site entrance.

One comment was received from a resident of Kenilworth Avenue as follows:

*“To change the windows to modern UPVC would completely change the character of this building which is a grade II listed building. The existing windows are serviceable and could be changed retaining the character of the building. The proposed profile of the UPVC does not take in to account the limited recess available to fit them. this again would change the character of the outlook of the building.”*

A letter of objection has been received from the Reading Civic Society, the main text of which reads as follows:

*“Reading Civic Society notes that the sashes in place probably date from the 1980s. It agrees that they appear to be appropriate replicas and have not had an adverse impact on the look of the building.*

*The sashes in place should also be in reasonably good condition and probably have 100 years life in them if maintained, if not longer. There is no such assurance with PVC which has a relatively short life of 10-20 years and themselves bring issues.*

*We therefore object most strongly to this most inappropriate proposal to replace wooden sash windows with PVC replacements. The look of the building would inevitably be harmed in a major way. As your report suggests no assurance could be taken that carrying out such work would not adversely impact other elements of the building.*

*You have rightly guided the committee that the priority should be to repair / refurbish should any sashes be in a bad way. It is, I suggest, worth emphasising as part of the decision that should any of the individual sashes required to be replaced (should they be beyond practical repair which will ensure them being in good condition for the long term) then LBC is required for this (i.e. a replacement is not a repair!). I raise this as builders appear to have a very limited understanding of when LBC is required and frequently guide building owners incorrectly.*

*We also agree that significant improvements in the efficiency of the working of the windows, and their thermal efficiency, can be achieved by weather strips which have a reasonably long life. In addition Secondary glazing is also possible but major work might be required.*

*So maintain properly, paint regularly and install weather strips and that will not only maintain the look of the building but will probably be significantly cheaper than the proposed PVC horrors.*

*It is difficult to understand this PVC madness. How can we ban PVC window salesmen from going anywhere near listed buildings I wonder?”*

## **5. RELEVANT PLANNING POLICY AND GUIDANCE**

- 5.1 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving a listed building or its setting or any features of special interest which it possesses.
- 5.2 Section 66(1) states that: “in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning

*authority, or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

- 5.3 The following local and national planning policy and guidance is relevant to this application:

National Policy

National Planning Policy Framework 2018

National Planning Practice Guidance 2018

Reading Borough Local Plan 2019 (adopted on 4 November 2019)

CC7 Design and the Public Realm

EN1 Protection and Enhancement of the Historic Environment

Other Guidance

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

## 6. APPRAISAL

- 6.1 Before considering the merits of this particular proposal it is important to consider the legal and policy context. The decision on a Listed Building Consent application, is governed by different legislation than with an application for planning permission.

*Legal*

- 6.2 Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to “*have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses*”.

- 6.3 In the 2014 case of East Northamptonshire District Council v. Secretary of State for Communities and Local Government (known as the ‘Barnwell Manor’ case) the Court of Appeal held that decision-makers should give ‘considerable importance and weight’ to the desirability of preserving listed building or its setting as directed by the Act.

*National Policy*

- 6.4 The NPPF (2019) (paragraph 189) requires 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. The level of detail should be proportionate to the assets’ importance and no 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. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

*Paragraph 191 states:*

6.5 *Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*

6.6 Paragraph 192 of the NPPF states that, local planning authorities should take into account:

*a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

*b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*c) the desirability of new development making a positive contribution to local character and distinctiveness.*

6.7 Paragraph 193 states that:

*“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”*

6.8 Paragraph 195 states that:

*“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*a) the nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.”*

6.9 Paragraph 196 states that:

*“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.”*

6.10 Guidance on the implementation of the NPPF is provided in Planning Practice Guidance (PPG)

*“In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest.*

*Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and*

Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.” (paragraph ID 18a-002-20140306)

- 6.11 The PPG states under ‘Why is ‘significance’ important in decision-taking?’ that:

*“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”*

- 6.12 Under the discussion of ‘How to assess if there is substantial harm?’ the PPG offers:

*“What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.”*

#### *Local Policy*

- 6.14 Paragraph 4.10 of the Local Plan Adoption Report (see Part 1 of the 13<sup>th</sup> November PAC agenda) confirms that: *“The new Local Plan also includes a much stronger emphasis on heritage. The previous documents contained one development management policy on heritage assets, but did not provide a particularly positive approach. There are now six policies on aspects of the heritage of Reading, which include much more proactive proposals for enhancing assets and taking account of heritage in new development.”* This is reflected in Policy EN1 which states that *“Historic features, areas of historic importance and other elements of the historic environment, including their settings will be protected and where possible enhanced. This will include: Listed Buildings...”*
- 6.15 Paragraph 4.2.1 of the Local Plan 2018 states that *“Reading’s unique heritage will be at the heart of the town’s identity and will be highly visible, valued and accessible by those who live in, work in or visit the town. It will enrich Reading’s communities and enable them to interact with, and celebrate, the town’s history and historic assets.”* Para. 4.2.2 continues *“The role of the Local Plan is to proactively conserve and enhance the historic environment and promote its enjoyment. This entails recognition of the value of historic features that are desirable for retention, ensuring that the most valued townscapes and landscapes (e.g. those with national and international designations) are given the highest level of protection and other locally valued assets are recognised, retained and enhanced wherever possible”.*

#### *Other Guidance*

- 6.16 Historic England publication ‘Traditional Windows Their Care, Repair and Upgrading (2017)’ explains that *“The loss of traditional windows from our older buildings poses one of the major threats to our heritage”* and continues, under the heading *“Why are plastic (PVC-u) windows unsuitable?”*, as follows: *“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. PVC-u is short for Poly Vinyl Chloride unplasticised and these windows are assembled from factory-made components designed for rigidity, thermal performance and ease of production. Their design, detailing and operation make them look different to traditional windows.*



*Manufacturers have been unable to replicate the sections/glazing bars used in most timber and steel windows due to the limited strength of the material and the additional weight of the secondary glazing units. (pp 6-7)."*

- 6.17 Where replacement is justified, the HE publication states that: *"The replacement window should match the form, detailing and operation of the window to be copied. It will be necessary for the maker of the new window to accurately copy the profiles of all the window components including head, jambs and cill of the frame and the stiles rails and glazing bars of the sashes or casements... Unfortunately, in many cases replacement products that claim to match historic designs do not do so. Exact reproduction is possible, and many firms of builders, carpenters or joiners can provide a bespoke service for timber windows."* (section 5.1).
- 6.18 Note that the advice above does not entertain the possibility of a plastic window and the advice of the HE publication in section 5.2 envisages the precise opposite of what is currently proposed (i.e. it assumes that there may be circumstances where a harmful plastic window may exist and it would be desirable to replace it with something more suitable): *"Where a window that diminishes the significance of the building, such as a PVCu window or an 'off the peg' timber window of an inappropriate pattern, is to be replaced the new window should be designed to be in keeping with the period and architectural style of the building. It may be possible to base the design on windows that survive elsewhere in the building or it may be necessary to look for examples in other buildings of the same period and style close by."*
- 6.19 It is clear from this advice that Historic England do not consider that replacement of timber windows in a listed building with a plastic version would be acceptable.

#### *Discussion*

- 6.20 The existing windows along the front elevation of Southcote Lodge are vertical sliding sashes with glazing bars in a six-over-six pattern with a three-over-six pattern at the second floor. The sash windows are consistent with the age of the building in terms of their style, detailing, construction using good quality timber joinery, and single-glazed.
- 6.21 Whilst the windows in the (1989) extensions to the Listed Building include uPVC windows, timber windows have been retained throughout the principal Listed Building. The contribution of timber windows to the overall character and special interest of the Listed Building is considered to be significant.
- 6.22 As a general rule, windows in historic buildings should be repaired, or if beyond repair should be replaced 'like for like' (see HE advice above). The existing windows should be retained, unless they are obviously inappropriate or in very poor condition. If new windows are to be accepted (due to the existing being beyond repair), it is important that their design, scale and proportion should be sympathetic to the character of the building. The thickness and moulding of glazing bars, the size and arrangement of panes and other details should be appropriate to the date of the building or to the date when the window aperture was made. In particular, for reasons of strength the thickness of frame members tends to be greater in plastic windows than in traditional timber ones (see HE advice above).



- 6.23 It appears from a review of historic photographs that many windows were replaced at the time the building was converted in the 1980s. However it is apparent that the windows are very good replica timber sliding sash which follow a traditional design and use historic construction techniques (in accordance with HE advice - see above). The existing windows are therefore considered to preserve the character of the listed building. The fact that most windows are not original does lend some support to the principle of further replacement where it could be shown to be necessary as part of responsible maintenance of the building over time. However it does not add any support to replacement windows which do not replicate the original character, and does not support wholesale replacement of windows, as many are not at the end of their serviceable life and could be appropriately refurbished as part of a heritage-focussed scheme of maintenance.
- 6.24 Replacing timber sash windows with double-glazed uPVC windows would harm the significance of the Grade II Listed Building in terms of its aesthetic value and evidential value. This is because, despite the statement on the drawings that the detailing of the replacement windows would match the existing in all respects, there would remain the fundamental difference in the materials used. The difference in the use of a plastic for the replacement windows would be visually obvious, as demonstrated by the surrounding windows within the (1989) extensions. It is also apparent that the fine detailing of the existing sash windows, in terms of their glazing bars, thickness and mouldings, could not be reproduced in uPVC. It is apparent that uPVC factory-made facsimiles of historic windows would detract from the aesthetic value and therefore the significance of the Listed Building.
- 6.25 The submitted drawings state that *“no other construction works will involve the grade II listed building apart from associated repairs in fitting the new windows”*. However that this cannot be known for certain without a more detailed survey of the building or a more detailed design for the windows and a schedule of works being provided. Timber windows have a different construction from plastic and sometimes perform a structural function. Additional works involving lintels, cills and surrounding brickwork may be required in order fit the proposed plastic frames. This would cause additional harm to the historic fabric of the listed building.
- 6.26 In replacing timber sash windows with double-glazed uPVC windows, the applicant would substantially harm the significance of the Grade II Listed Building in terms of its aesthetic value and evidential value. Under the principles of the NPPF, applicants must be able to justify any harm to Listed Buildings and no justification has been provided, or can be envisaged for installation of unnecessary and historically inappropriate plastic windows.
- 6.27 The applicant’s aspirations for improving the air tightness and thermal performance of the building are noted. It is considered that this does not necessitate removal of the existing windows. Weather stripping and draught proofing are visually more innocuous changes as well as thermally efficient and cost-effective. Secondary glazing in a removable inner frame is another acceptable option for some windows. It is relevant to note that English Heritage, following tests on timber sash window by Glasgow Caledonian University, reported in their 2009 publication *Research into The Thermal Performance of Windows: Timber Sash Windows* that:
- *“There are major opportunities for improving the thermal performance of existing windows by relatively simple methods, including traditional curtains, blinds and shutters.*

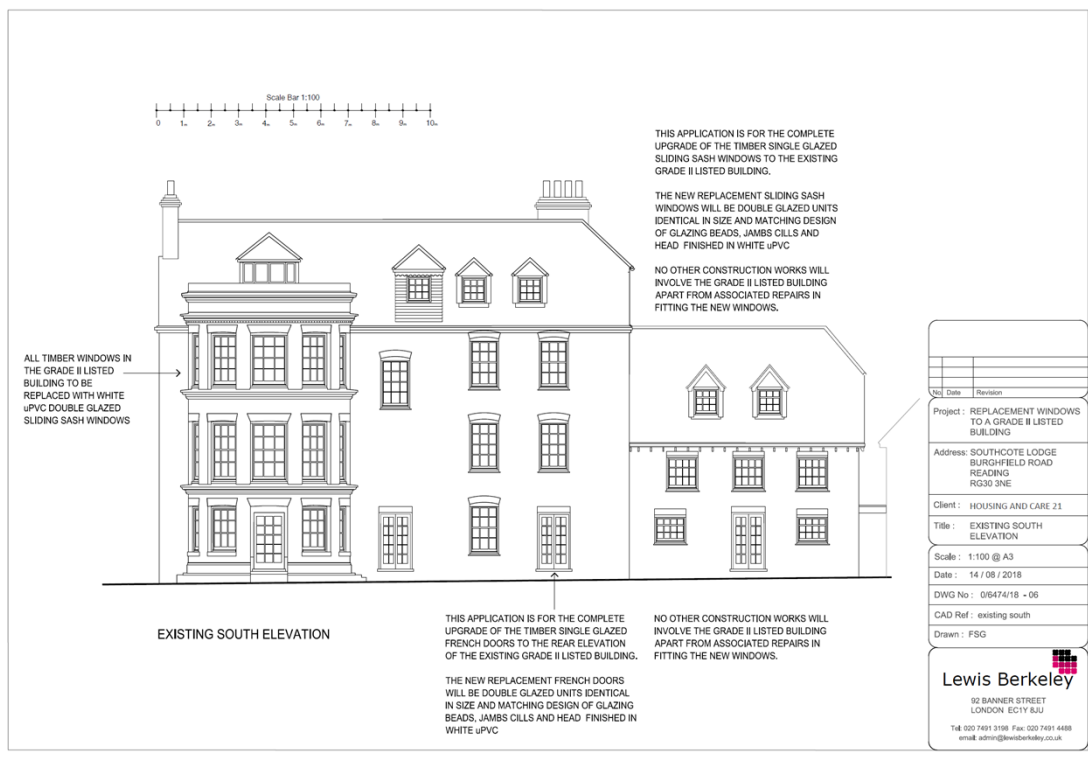
- *There is a good potential for improvement from draught proofing, with air infiltration through the repaired and draught proofed window being somewhat less than through a standard trickle ventilator.*
- *There is potential for further improvement where secondary glazing with a low-emissivity coating is used as well. This gives good performance in the daytime, and better still at night when curtains, blinds and shutters can be closed.* (English Heritage, 2009, *Research into The Thermal Performance of Windows: Timber Sash Windows*). (These findings are also referred to in the Historic England publication *Traditional Windows Their Care, Repair and Upgrading* (2017)).

## 7. CONCLUSION

- 7.1 It is considered that substantial harm would occur to the heritage significance of the listed building as a result of the proposed changes to the windows, which are an important feature of the historic building. Approval of the proposed works would be contrary to adopted development plan policy, national policy and guidance, and would be in clear conflict with the statutory duty on the Council to have special regard to the desirability of preserving the building and its features of special interest.
- 7.2 The applicant is encouraged to enter into discussions with the Council to explore the possibility of a scheme of replica replacement windows, or refurbishment of existing, as appropriate.

Case Officer: Steve Vigar

Drawings (selection only) - Full details at:  
[http://planning.reading.gov.uk/fastweb\\_PL/welcome.asp](http://planning.reading.gov.uk/fastweb_PL/welcome.asp)



South Elevation (to rear garden)



North Elevation (to front driveway)



Rear Bay