
Site Address:	Flat 7, Royal Apartments, 31 Sea Front, Hayling Island, PO11 0AD		
Proposal:	Listed building consent for the replacement of 6No.single glazed sash windows on north side of flat.		
Application Type:	Listed Building Consent		
Application No:	APP/23/00114	Expiry Date:	03/04/2023
Applicant:	Dr Ogg		
Agent:		Case Officer:	Selina Donophy
Ward:	Hayling West		

Recommendation: **REFUSE LISTED BUILDING CONSENT**

1 Site Description

1.1 The Royal Apartments are situated in the south of Hayling Island, with the south elevation (the principal elevation) fronting onto Hayling beach. The building, which is now subdivided into apartments, was formerly the Royal Hotel, built in circa 1825 and is a Grade II listed building (listing date: 26/5/76).

1.2 The Historic England listing description is as follows:

Former hotel, continued in use by a London Borough, for its local people. Circa 1825. Painted brick, stucco features, and a slate roof. Symmetrical front (south) of 3 storeys, 2.2.3.2.2 windows, each unit marked by plain pilasters and the projecting centrepiece (with an early C20 westward extension of 5 attic above 4 windows). Brick walling in Flemish bond, rubbed flat arches, arched openings to (the original) ground floor; stucco cornice, with a blocking course (or parapet) raised above the centrepiece as a low pediment, 2nd floor band. Sashes in reveals (mostly Victorian). The feature of the building is a 1st floor cast-iron balcony across the 3 middle units, mocked at the ground floor by a continuous modern glazed porch across the whole of the old front, The central doorway has a fanlight above double ½-glazed doors.

1.3 Flat No. 7, which is subject to this application, is situated on the fourth (top) floor with a north and southerly aspect. The north elevation includes 6no. wooden framed, single glazed, sash windows, with secondary glazing. The south elevation includes 2no. replacement timber frame sash windows with slimline double glazing.

2 Planning History

APP/11/01519 - Replacement of existing window with french doors and replacement of existing door with window on ground floor of the south elevation., PERM,14/12/2011

APP/11/01558 - Listed Building Consent for replacement of existing window with french doors and replacement of existing door with window on ground floor of the south elevation., PERM,14/12/2011

APP/11/01755 - Listed Building Consent for installation of window at first floor to north elevation., PERM,06/01/2012

APP/14/01233 - Unauthorised Installation of double glazed UPVC windows., NFA,27/11/2014

APP/16/00225 - New terrace with boundary walls and alterations to access ramp., PERM,21/04/2016

APP/16/00226 - Listed Building Consent for new terrace with boundary walls and alterations to access ramp., PERM,21/04/2016

APP/16/01299 - Listed Building application for replacement double glazed timber sliding sash windows., PERM,16/02/2017

APP/20/00783 - Listed Building consent for replacement of 2No. south-facing sash windows., PERM,11/12/2020

APP/21/00331 - Listed Building Consent for replacement of existing window with french doors and replacement of existing door with window on ground floor of the south elevation., PERM,13/05/2021

3 Proposal

Listed building consent for the replacement of 6No. single glazed sash windows on north side of flat.

4 Policy Considerations

National Planning Policy Framework
Havant Borough Council Borough Design Guide SPD December 2011
Havant Borough Council Parking SPD July 2016

Havant Borough Local Plan (Core Strategy) March 2011

CS11 (Protecting and Enhancing the Special Environment and Heritage of Havant Borough)
CS16 (High Quality Design)

Havant Borough Local Plan (Allocations) July 2014

DM20 (Historic Assets)
AL1 (Presumption in Favour of Sustainable Development)

Listed Building Grade: Grade 2
Conservation Area: Not applicable.

5 Statutory and Non Statutory Consultations

Conservation Officer Assessment

This proposal is for the replacement of the 6no. sash windows on the north elevation of Flat No. 7, which is on the fourth floor of the building, overlooking the car park. The proposal is to replace these windows with new hardwood sash windows with slim line style double glazing (depth of glazing would be 14mm (4/6/4)), filled with a white spacer bar and with horns on the top fixed sash only.

The existing windows are historic in their character comprising timber framed, (painted white), timber sash windows with 4no. single glazed panes and slender glazing bars fixed in place with putty. The windows are slightly recessed into their reveals and the glazing, further recessed again, results in a very traditional appearance. The single glazing allows for the narrow and elegant glazing bars. This style of windows is evident across the north elevation of the building which is highly visible from the road known as Sea Front. The windows on the lower floors are larger in size.

- 1 A short heritage statement has been included with the application which touches on the historical significance of the building, that being its date of construction and acknowledgement of its listing. The justification provided for the replacement of the windows is that they are in poor condition with peeling paint and defective mechanisms. It is stated that whilst some could be repairable, the main objective for their replacement is to increase thermal efficiency, which can only be achieved if all the windows are replaced with double glazing. Secondary double glazing is installed on these windows, but the owner finds this to be ineffective.
- 2 Planning permission and listed building consent was granted in 2020 for the replacement of 2no. windows on the north elevation, with new timber framed windows with slimline style, double glazing. The justification for the granting of these applications was that whilst replacement, sealed double glazed units would not as a rule be supported within a listed building where historic windows remained in situ, an exception is made in this instance given the exposed location of this elevation to the sea front and the weather extremities it experiences.
- 3 The LPA recognises and is aware of the increasing wish for owners of listed buildings to be more energy efficient, given the recent upsurge in energy prices in the UK. However, when it comes to a listed building, one which is statutorily protected as a piece of history, a more considered approach to energy efficiency is required. More often than not, this approach needs to be bespoke to the particular building, taking into account any previous changes which have taken place, some of which may have been harmful to the historical or architectural significance of the asset. Historic windows and doors make a major contribution to the significance and character of historic buildings, so

every effort should be made to retain them where possible, rather than replace them. Windows and doors can portray elements of a building's history, including changing architectural styles, social hierarchy, building economics and craft skills.

- 4 The LPA has a duty to adhere to planning law and in particular regard to listed buildings, the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of this act requires planning authorities, when 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 architectural or historic interest which it possesses.** This requirement is also built into national and local planning policy.
- 5 With regards to thermal efficiency, this is very rarely a sound reason in itself for replacing an original, historic window which has architectural/historic significance. There are several ways in which a window or door can be made more effective to reduce heat loss. This could include the use of a specialist company which engages in overhauling, repairing and fitting draught seals. Research undertaken by Historic England has demonstrated there are opportunities for enhancing the thermal efficiency of a typical timber window by up to 60% through the use of basic cost-effective measures, including traditional curtains, blinds and shutters; draught proofing and secondary glazing incorporating low-emissivity glass. Historic England also advise adopting a 'whole building approach', which is site specific and takes into account all factors affecting energy use.
- 6 With regards to slimline style glazing, Historic England advise that this would be a suitable solution where it is proposed to replace non-traditional, unsympathetic windows in unlisted buildings within conservation areas. It may also be an appropriate solution for use in new extensions to listed buildings.
- 7 The windows which are subject to this listed building application, make an important contribution to the architectural significance of the building, being surviving example of traditional style windows, retaining single glazing and narrow profile glazing bars. These windows, along with the others on the north elevation, provide an elegance and uniformity which further enhances the wider appreciation of the significance.
- 8 It is recognised that being positioned on the top floor, the proposed changes to the windows are unlikely to be noticeable from the context of the streetscene. However, it is considered that the loss of these windows and replacement with double glazed units would still be harmful to building's significance. Whilst it is appreciated that slimline style, double glazing can achieve a more traditional look than a standard double-glazed unit, it still cannot replicate exactly the narrow glazing bar profile.
- 9 The duty of the LPA is to protect the significance of their designated heritage assets and the advice from Historic England is to repair, rather than replace

historic windows, given that there are a number of other measures which can be explored to achieve a more thermally efficient building, such as the whole building approach and prioritising maintenance.

- 10 As per the NPPF guidance, the level of harm must be identified and this proposal is considered to result in 'less than substantial harm' at a low level. Para 202 of the NPPF advises 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.
- 11 It is concluded that in this case, the proposal does not accord with Para 202 of the NPPF, as there are no public benefits which would outweigh the harm. The application should therefore be recommended for refusal.

CONCLUSION – OBJECTION

Councillor Brenda Linger - Hayling West

No comment received

Councillor Clare Satchwell - Hayling West

No comment received

Councillor Julie Richardson

No comment received

6 Community Involvement

This application was publicised in accordance with the Council's Code of Practice for Publicity of Planning Applications approved at minute 207/6/92 (as amended), as a result of which the following publicity was undertaken:

Number of neighbour notification letters sent: 17

Number of site notices: 1

Statutory advertisement: 24/02/2023

Number of representations received: 0

Comment	Officer Comment
No comments received	

7 Planning Considerations

7.1 Having regard to the relevant policies of the development plan it is considered that the main issues arising from this application are:

- (i) Principle of development
- (ii) Impact upon the Grade II Listed Building

(i) Principle of development

7.2 The application site is situated within an urban area where further development is considered acceptable subject to the usual development control criteria.

7.3 Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("1990 Act") requires local planning authorities to have special regard to the desirability of preserving a listed building, its setting or any features of special architectural or historic interest when considering whether to grant listed building consent.

7.4 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when 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 architectural or historic interest which it possesses.

7.5 Policy CS11 of the Core Strategy states that planning permission will be granted for development that:

7.6 Protects and where appropriate enhances the borough's statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest.

7.7 Policy DM20 of the Allocations Plan states that planning permission will be granted for development proposals that conserve and enhance the historic assets of Havant. It also states that applications which affect, or have the potential to affect, heritage assets are expected to provide a Heritage Statement that:

1. Describe the significance of the asset and its setting, using appropriate expertise and where necessary original survey, at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal.
2. Sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets.

(ii) Impact upon the Grade II Listed Building _

- 7.8 The main considerations in the determination of this application relate to the design and appearance of the proposed alterations and whether they would have a detrimental impact on the historic character and significance of the Grade II listed building which was constructed in 1825 as the former Royal Hotel and is now subdivided into separate apartments. This proposal comprises the replacement of the 6no. sash windows on the north elevation of Flat No. 7, which is on the fourth floor of the building, overlooking the car park. The proposal is to replace these windows with new hardwood sash windows with slim line style double glazing (depth of glazing would be 14mm (4/6/4)), filled with a white spacer bar and with horns on the top fixed sash only.
- 7.9 The LPA has a duty to adhere to planning law and in particular regard to listed buildings, the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of this act requires planning authorities, when 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 architectural or historic interest which it possesses. This requirement is also built into national and local planning policy.
- 7.10 Havant's Heritage Officer has been consulted on this proposal and has taken into account the justification for the 6no. window replacement as stated by the applicant within the submitted Heritage Statement. It is understood that whilst the windows are in need of repair, it is stated that repair may be possible for some of the windows and that thermal efficiency forms part of the reasoning for replacement. I refer to the consultee response from the Heritage Officer below :
- 7.11 *This proposal is for the replacement of the 6no. sash windows on the north elevation of Flat No. 7, which is on the fourth floor of the building, overlooking the car park. The proposal is to replace these windows with new hardwood sash windows with slim line style double glazing (depth of glazing would be 14mm (4/6/4)), filled with a white spacer bar and with horns on the top fixed sash only.*
- 7.12 *The existing windows are historic in their character comprising timber framed, (painted white), timber sash windows with 4no. single glazed panes and slender glazing bars fixed in place with putty. The windows are slightly recessed into their reveals and the glazing, further recessed again, results in a very traditional appearance. The single glazing allows for the narrow and elegant glazing bars. This style of windows is evident across the north elevation of the building which is highly visible from the road known as Sea Front. The windows on the lower floors are larger in size.*
- 7.13 *A short heritage statement has been included with the application which touches on the historical significance of the building, that being its date of construction and acknowledgement of its listing. The justification provided for the replacement of the windows is that they are in poor condition with peeling paint and defective mechanisms. It is stated that whilst some could be repairable, the main objective for their replacement is to increase thermal efficiency, which can only be achieved if all the windows are replaced with double glazing. Secondary double glazing is installed on these windows, but the owner finds this to be ineffective.*

- 7.14 *Planning permission and listed building consent was granted in 2020 for the replacement of 2no. windows on the north elevation, with new timber framed windows with slimline style, double glazing. The justification for the granting of these applications was that whilst replacement, sealed double glazed units would not as a rule be supported within a listed building where historic windows remained in situ, an exception is made in this instance given the exposed location of this elevation to the sea front and the weather extremities it experiences.*
- 7.15 *The LPA recognises and is aware of the increasing wish for owners of listed buildings to be more energy efficient, given the recent upsurge in energy prices in the UK. However, when it comes to a listed building, one which is statutorily protected as a piece of history, a more considered approach to energy efficiency is required. More often than not, this approach needs to be bespoke to the particular building, taking into account any previous changes which have taken place, some of which may have been harmful to the historical or architectural significance of the asset. Historic windows and doors make a major contribution to the significance and character of historic buildings, so every effort should be made to retain them where possible, rather than replace them. Windows and doors can portray elements of a building's history, including changing architectural styles, social hierarchy, building economics and craft skills.*
- 7.16 *The LPA has a duty to adhere to planning law and in particular regard to listed buildings, the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 of this act requires planning authorities, when 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 architectural or historic interest which it possesses.** This requirement is also built into national and local planning policy.*
- 7.17 *With regards to thermal efficiency, this is very rarely a sound reason in itself for replacing an original, historic window which has architectural/historic significance. There are several ways in which a window or door can be made more effective to reduce heat loss. This could include the use of a specialist company which engages in overhauling, repairing and fitting draught seals. Research undertaken by Historic England has demonstrated there are opportunities for enhancing the thermal efficiency of a typical timber window by up to 60% through the use of basic cost-effective measures, including traditional curtains, blinds and shutters; draught proofing and secondary glazing incorporating low-emissivity glass. Historic England also advise adopting a 'whole building approach', which is site specific and takes into account all factors affecting energy use.*
- 7.18 *With regards to slimline style glazing, Historic England advise that this would be a suitable solution where it is proposed to replace non-traditional, unsympathetic windows in unlisted buildings within conservation areas. It may also be an appropriate solution for use in new extensions to listed buildings.*

- 7.19 *The windows which are subject to this listed building application, make an important contribution to the architectural significance of the building, being surviving example of traditional style windows, retaining single glazing and narrow profile glazing bars. These windows, along with the others on the north elevation, provide an elegance and uniformity which further enhances the wider appreciation of the significance.*
- 7.20 *It is recognised that being positioned on the top floor, the proposed changes to the windows are unlikely to be noticeable from the context of the streetscene. However, it is considered that the loss of these windows and replacement with double glazed units would still be harmful to building's significance. Whilst it is appreciated that slimline style, double glazing can achieve a more traditional look than a standard double-glazed unit, it still cannot replicate exactly the narrow glazing bar profile.*
- 7.21 *The duty of the LPA is to protect the significance of their designated heritage assets and the advice from Historic England is to repair, rather than replace historic windows, given that there are a number of other measures which can be explored to achieve a more thermally efficient building, such as the whole building approach and prioritising maintenance.*
- 7.22 *As per the NPPF guidance, the level of harm must be identified and this proposal is considered to result in 'less than substantial harm' at a low level. Para 202 of the NPPF advises 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.*
- 7.23 *It is concluded that in this case, the proposal does not accord with Para 202 of the NPPF, as there are no public benefits which would outweigh the harm. The application should therefore be recommended for refusal.*

8 Conclusion

- 8.1 The proposed replacement of the 6no. windows within the north elevation with slimline style double glazing, would be harmful to the architectural and historical significance of the building, resulting in less than substantial harm, at the low end of the scale, for which there are no public benefits arising. This is contrary to Paragraph 202 of the NPPF, Policies CS11 and CS16 of the Local Plan (Core Strategy) as well as Policy DM20 of the Havant Borough Allocations Plan .
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9 RECOMMENDATION:

That the Head of Planning be authorised to for application APP/23/00114 for the following reason:

- 1 The proposed replacement of the 6no. windows within the north elevation with slimline style double glazing, would be harmful to the architectural and historical significance of the building, resulting in less than substantial harm, at the low end of the scale, for which there are no public benefits arising. This is contrary to Paragraph 202 of the National Planning Policy Framework, Policies CS11 and CS16 of the Havant Borough Local Plan (Core Strategy) 2011 as well as Policy DM20 of the Havant Borough Local Plan (Allocations) 2014.