

Heritage Team Response

Date – 10/11/2020

APP/20/00859 – Homewell House, 22 Homewell, Havant

Background

Homewell House is located in Homewell in the centre of the St Faiths Conservation Area. It comprises a three-storey Georgian building which is Grade II listed. The frontage of the building overlooks the St Faiths Church (Grade II* listed) and its churchyard. The building has changed use from a house, to an office, back to housing under the ownership of a housing association. The listing description is as follows:

‘Early C19. Brick, with a tile roof. Symmetrical front (north) of 3 storeys, 3 windows. Hipped roof, brick dentil eaves. Red brickwork in Flemish bond, rubbed flat arches, stone cills. Sashes in reveals. Doorcase with open pediment (with modillions), broken cornice above pilasters, arched opening with radiating fanlight, and 6-panelled door’.

There have been previous extensions to Homewell House in the past, but with the rear section being linked at first floor level at the rear.

Proposal

Listed Building Consent for removal of all existing timber-framed sash windows and replacement with double glazed, timber-framed sash windows.

Legislative and Policy Context

When assessing the proposal, the following legislation and policy context is taken in consideration.

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.

Section 72 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 Conservation Area, to have special regard to the desirability of preserving or enhancing the character and appearance of that area.

The revised National Planning Policy Framework (NPPF) was published in February 2019 and sets down the policies that the Council must take into account when determining planning applications. The ‘Historic Environment Good Practice Advice in Planning Note 2’, states at paragraph 4:

‘The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest’ and provides at paragraphs 8, 9 and 10 that in order for the Local Planning Authority to make decisions in line with legal requirements, the objectives of the development plan; and, the policy requirements of the NPPF, great importance is placed on understanding the nature, extent and level of the significance of the heritage asset.

The revised NPPF (February 2019) sets out in Chapter 16, the core principles relating to development affecting Heritage Assets that local planning authorities should consider in making planning decisions in the following paragraphs:

‘184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

189. 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.

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.

191. 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.

192. In determining applications, local planning authorities should take account of:

- 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.

Considering potential impacts

193. 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.

194. 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. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

With regards to local planning policy, the following are relevant:

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

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.

Policy CP16 (1a) of the Core Strategy states 'Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design:

Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site'.

Policy DM20 of the Allocations Plan states that planning permission will be granted for development proposals that conserves and enhances the historic assets of Havant. It also states that application 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.

Officer Response:

With regards to replacement windows on heritage style and listed buildings, the Council has specific guidance in the form of 'Windows in Listed Buildings and Conservation Areas Guidance Note'.

There is also a wealth of advice published by Historic England on traditional windows including; Energy Efficiency in Historic Buildings, Technical Conservation and Energy Efficiency and Traditional Homes.

Local Plan Policy DM20 as outlined above requires a Heritage Statement (HS) to be submitted with any application that affects a heritage asset. The application does include a HS however, this is lacking in detail and does not describe the significance of the asset and its setting, nor set out the impact of the development on the heritage asset. The building is Grade II listed and therefore considered to be of national importance. It also sits within the St Faiths Conservation Area, which is also a designated heritage asset in its own right. However, no reference at all has been made to the conservation area in the HS submitted with the application.

The reason given for the replacement windows is that the existing timber frame, single glazed sash windows have significantly degraded and that the new windows will increase the thermal performance of the building. A total of 10no. windows are proposed to be replaced including all those on the front elevation (8) and the two on the west/side elevation including a double height, arched feature window.

The application contains insufficient justification that all the 10no. windows are degraded to a point whereby they are beyond economic repair. For example, for each window has the following been considered?

- Has been a deformation due to structural movement?
- Are there any broken sash cords?
- Are the putty and paint defective?
- Is there displaced or broken glass?
- Are they opening parts of the window jammed due to the paint?
- Are there any worn and damaged beads which rattle?
- Has the cill decayed?

If the primary objective is to increase the energy efficiency of the windows, this can be achieved following the necessary repair of the windows which should obtain the optimal performance from an existing window. Further to this, draught proofing can be utilised, as the use of traditional features such as blinds, curtains and shutters. The use of secondary glazing can also be very useful in energy efficiency. The approach of repair and increased efficiency is more sustainable without harming the significance of the building.

Conclusion

The Heritage Statement submitted with the application is insufficient and does not meet the requirements of Policy DM20 and the NPPF.

The presence of the original windows on the building forms an important part of its architectural significance, its aesthetic value and its contribution to the conservation area. Historic windows are fundamental to its life and the historical development of building trades and architecture. There is insufficient evidence to justify that the windows are beyond economic repair. As such, their proposed replacement, is considered to be harmful to the significance of the designated heritage asset and would not meet the test of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which 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.

As such, I am not able to support the application for the following reasons:

1. The Heritage Statement submitted with the application does not adequately assess the significance of the designated heritage asset and therefore does not meet the requirements of Policy DM20 of the Local Plan (Allocations) 2011.
2. The proposed replacement wooden framed, double glazed windows would have a harmful impact of the significance of the designated heritage asset – Homewell House and would not comply with Policy CS11 of the Local Plan and the NPPF.

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