



HERITAGE & PLANNING STATEMENT

**PLANNING APPLICATION FOR THE REPLACEMENT OF FRONT
WINDOWS AT GROUND AND FIRST FLOOR FROM UPVC TO
TIMBER SASH WINDOWS at**

103 Sheen Road, Richmond TW9 1YJ

**PREPARED BY
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1.0 INTRODUCTION

- 1.1 Paragraph 200 of the National Planning Policy Framework (2023) (NPPF) advises that when development affecting a heritage asset is proposed (such as to a building in a conservation area), the planning authority should require an applicant to demonstrate that they have considered the impact of their proposals on the significance of the asset. The assessment of the significance of the impact should be included within a heritage statement.
- 1.2 This document is a heritage and planning statement that sets out the impact of the proposal on the significance of the Sheen Road Conservation Area in order to comply with the requirements of the NPPF and the Council's Local List requirements. An assessment against the planning policy framework for the Council will also be included.
- 1.3 The applicants have taken into account Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring decision makers to have special regard to the desirability of preserving or enhancing the character or appearance of a conservation area. As will be demonstrated within the application documents, the development enhances the character and appearance of the Sheen Road Conservation Area in compliance with the Planning Act 1990.

2.0 SITE AND SURROUNDINGS

- 2.1 The site comprises a 3 storey mid-terrace single family dwellinghouse situated on the south side of Sheen Road in the Richmond.
- 2.2 The application site is within the Sheen Road Conservation Area but is not designated as a Building of Townscape Merit.
- 2.3 Photographs below show the front of the property in context with the neighbouring properties. Whilst it will be noted that a number of the properties have been altered with upvc windows it is acknowledged that they were not granted planning permission and the original windows would have been timber sash windows.
- 2.4 Below are photographs of the site and neighbouring properties.



Nos. 103 (on left) and 101 Sheen Road



Nos. 99, 97 and 95



Nos. 105, 107 and 109

3.0 PLANNING HISTORY

3.1 The only planning history relates to an enforcement case relating to the insertion of UPVC windows into the ground and first floor levels within the front elevation. On 16 November 2023, an enforcement notice was issued against the installation of uPVC framed double glazed casement windows at ground and first-floor levels on the front elevation. The requirements set out in paragraph 5 of the notice are:

- (a) Permanently remove the Windows and reinstate windows which match in facsimile with those which existed before the breach of planning control as shown in the photo attached hereto; and
- (b) Permanently remove from the Land any waste associated with complying with step 5(a) above.

The period for compliance with the requirements is 3 months.



previous windows

- 3.2 On 7th June 2024, an appeal against the enforcement notice was dismissed and the enforcement notice upheld with a requirement to replace the windows within a 6 month period.
- 3.3 The Inspector noted the following:

“The appeal building forms part of a group of 14 similarly designed buildings at Nos 95a to 121 Sheen Road. The windows which are the subject of this appeal have thick, chunky frames. As I saw on my site visit, this is readily apparent when passing by on the street.

The effect is in stark contrast to the slender window frames seen at the same floor levels on the other houses in this group. From the information provided, the thickness of the window frames is also in contrast to those which previously existed on the front of the appeal building at ground and first floor level.

As such, the appeal development is an unsympathetic and incongruous alteration within the street scene. This is harmful to the character and appearance of the area, including the conservation area and its significance.

The appellant has made repeated references to the use of uPVC windows elsewhere in the street. But the reasons for issuing the notice are clear that it is the thickness of the frames that is the specific concern in this case, rather than the choice of material per se”.

4.0 PROPOSAL

- 4.1 This planning application seeks consent to regularise the matter through the installation of timber framed sash windows to replace the unauthorised windows. This comprises 7no. windows – 4 within the ground floor bay window and 3no. on the first floor.
- 4.2 Details are provided from the window company, Grabex Windows which shows the high quality timber sash windows which will be installed. They will be very similar to the neighbour's sash windows and thus those originally installed in the building.

5.0 PLANNING POLICY

- 5.1 The development plan comprises the Richmond upon Thames Local Development Local Plan (July 2018) and the London Plan (2021). The National Planning Policy Framework (NPPF) from 2023 is also a material consideration.

National Planning Policy Framework 2023 (NPPF)

- 5.2 The NPPF requires, at section 12, high quality buildings and beautiful design which is key aspect to sustainable development. Paragraph 135 states that development should be visually attractive as a result of good architecture and layout and are sympathetic to local character and history.

Heritage assets

- 5.3 Paragraph 203 states that 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..
- 5.4 Paragraph 208 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.”

- 5.5 Paragraph 209 states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

London Plan

- 5.6 The main London Plan policies applying to the site are:

- Policy D4 - Delivering good design
- Policy HC1 - Heritage Conservation and Growth
- Policy D12 - Fire Safety

Richmond upon Thames Local Plan

- 5.7 The policies which are relevant to this proposal are:

- i. LP1 Local Character and Design Quality
- ii. LP3 Designated Heritage Assets

Richmond Publication Local Plan (Regulation 19 version)

- 5.8 The Richmond Publication Version Local Plan (Regulation 19 version) and its supporting documents, including all the Regulation 18 representations received, was considered at Full Council on 27 April. Approval was given to consult on the Regulation 19 Plan and, further, to submit the Local Plan to the Secretary of State for Examination in due course. The Publication Version Local Plan, including its accompanying documents, have been published for consultation on 9 June 2023. Together with the evidence, the Plan is a material consideration for the purposes of decision-making on planning applications.

- 5.9 The weight to be given to each of the emerging policies and allocations will depend on an assessment against the criteria set out in paragraph 48 of the NPPF. Relevant policies are:

- Policy 28: Local character and design quality
- Policy 29. Designated heritage assets

Supplementary Planning Document 'House Extensions and External Alterations' 2015.

5.10 Section 5.4 of the SPD for House Extensions relates to Windows and states at paragraph 5.4.1:

- Windows are important features and an inappropriate choice can easily spoil an otherwise satisfactory design.
- Maintain consistent style – Changing the internal divisions (mullions, transoms and pane shapes and sizes) within the window can completely alter the effect of the overall proportions. Ensure that new windows reflect the style and details of the existing windows.
- Repair or replace with same/similar – When an original window requires attention, the best course of action wherever possible is to repair. If however the window is beyond repair, it should be replaced with a window of the same shape, size and design.
- Avoid mixing styles – Mixing different types of window on the front elevation should be avoided
- Historic replacement – Late Victorian and Edwardian bays should be retained or replaced in their original form. Removing them spoils the individual house and the street. Be very careful in selecting replacement windows because many products are available which although claiming to represent a particular age (e.g. Georgian) bear little resemblance to authentic examples.
- Modern replacement – In recent years there has been considerable growth in window replacement companies selling uPVC windows. Timber lasts longer and is always preferable because uPVC can never fully replicate the original appearance and is unsustainable.
- Double glazing – Whilst the insulation benefits of double glazing are acknowledged, the installation of such should be sensitive to the character of the original property and area. Where appropriate (and in particular on historic buildings and in conservation areas) heritage double glazing will be sought, which benefits from very thin glazing units.

THE CONSERVATION AREA

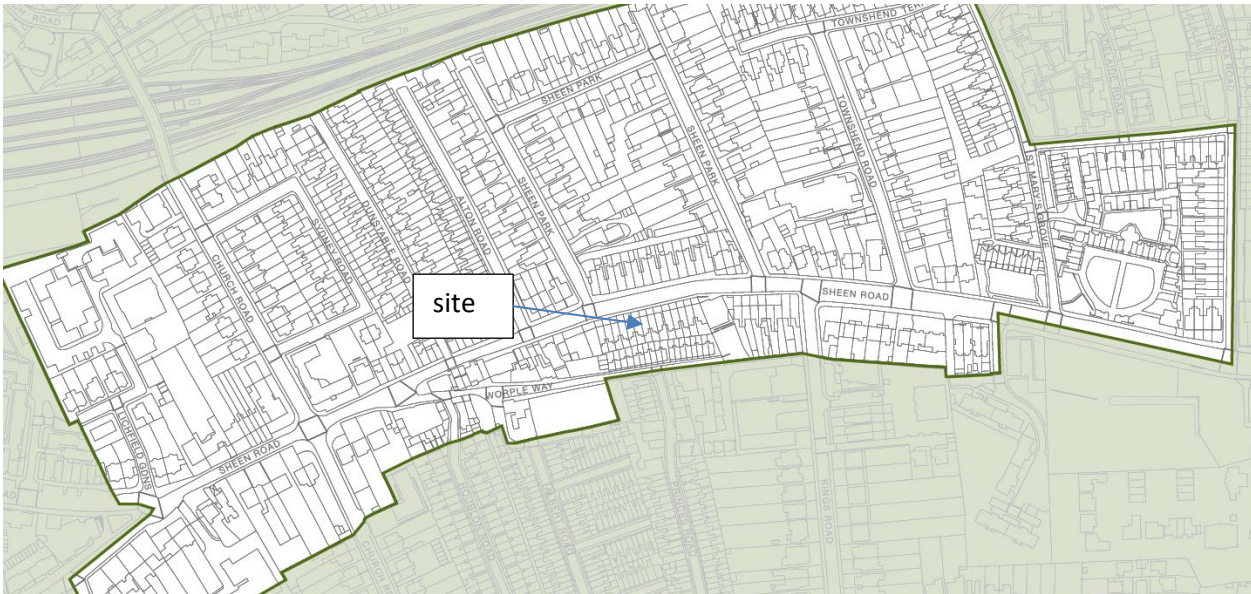
5.11 The Sheen Road Conservation Area statement describes Sheen Road as the historic route from Richmond to London which retains high quality buildings including some 18th century development.

Problems and Pressures

- Loss of traditional architectural features and materials due to unsympathetic alterations

Opportunity for Enhancement

- Preservation, enhancement and reinstatement of architectural quality and unity



6.0 PLANNING CONSIDERATIONS

6.1 The main considerations to be considered are the impact of the proposed design upon the host dwelling and the character and appearance of the Sheen Road Conservation Area.

Design and heritage issues

- 6.2 In terms of such a heritage asset there is a duty imposed by Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requiring decision makers to have special regard to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- 6.3 The proposed timber framed sash windows are of a very high quality and will enhance the appearance of building given the windows prior to the UPVC windows being installed were casement and not original to the building. The neighbouring property provides an example of the original timber sash windows and this proposal will ensure the traditional and original features are restored. The thickness of the frames will be much more slender than those of the UPVC windows and the use of timber is much more sustainable and an acceptable material.
- 6.4 By virtue of its design and scale, the character of the house, terrace and appearance of the Queens Road Conservation Area within which it is situated would be enhanced. As such, the proposal complies with Policy LP1 and LP3 of the Local Plan (July 2018) and the historic environment policies of the Framework and Policy 28 and 29 of the draft Local Plan (June 2023).

Fire Safety

- 6.5 London Plan policy D12 requires the submission of a Fire Safety Statement on all planning applications. A Fire Safety Statement is submitted with this application. The scheme is considered to be consistent with this Policy D12 of the London Plan.

7.0 CONCLUSIONS

- 7.1 The National Planning Policy Framework (NPPF) states that the creation of high quality and beautiful buildings and places is fundamental to what the planning and development process should achieve.
- 7.2 The significance of the heritage asset of the Sheen Road Conservation Area is in the appearance of the buildings which front the main road. In this instance, the replacement of the unauthorised windows at ground and first floor levels with timber sash windows would be an enhancement to the character and appearance of the conservation area.
- 7.3 To ensure compliance with enforcement notice (as amended by the Appeal Decision dated 7th June 2024) the windows will be replaced before 6th December 2024, subject to the granting of planning permission for this alteration.
- 7.4 Overall, the proposal is considered to comply with the NPPF and policies LP1 and LP3 of the Richmond upon Thames Local Plan 2018, the aims of the SPD 'House Extensions and External Alterations' and to the NPPF. We trust you can grant planning permission for this proposed development.