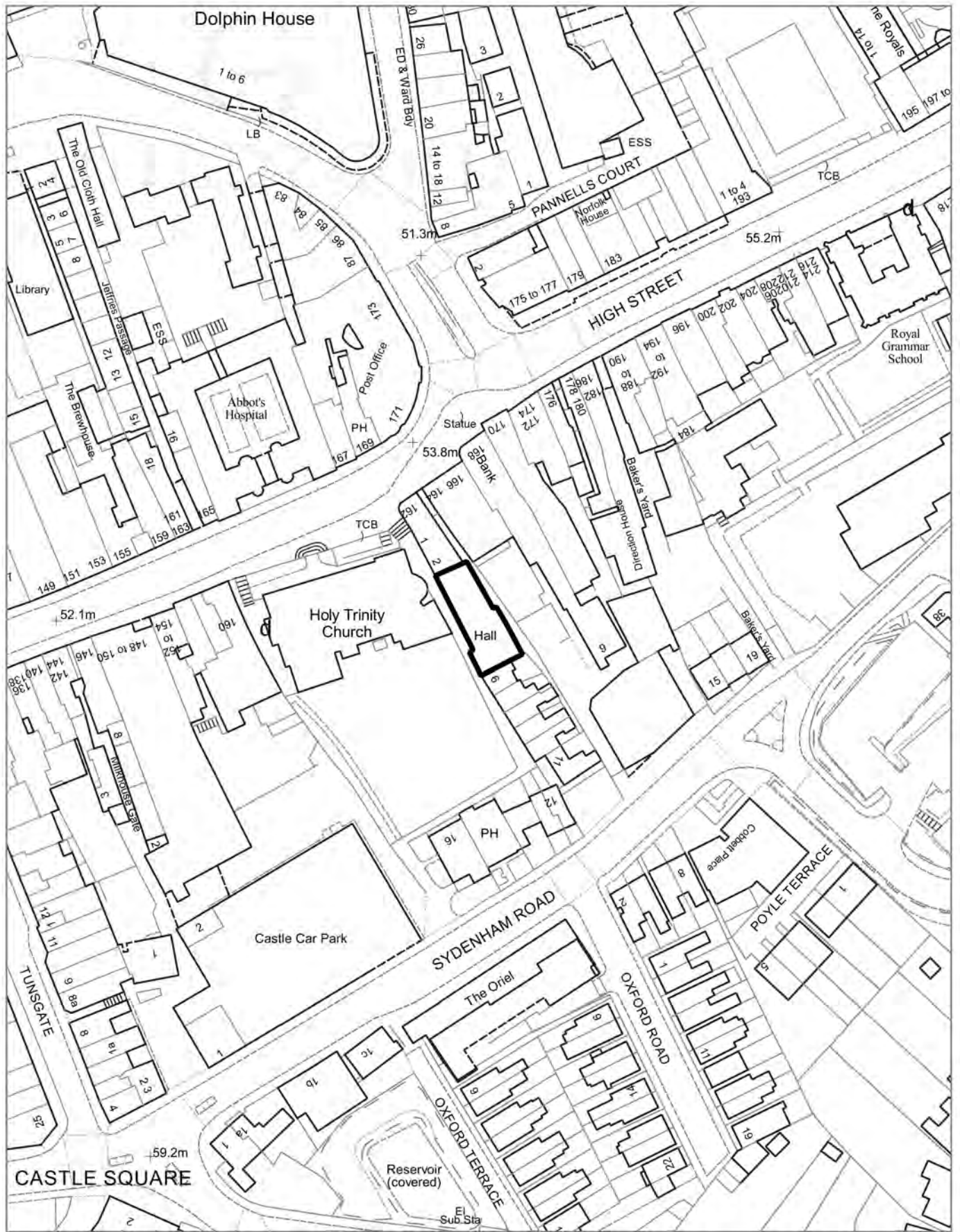


20/P/01163 - Holy Trinity Parish Office, 5 Trinity Churchyard, Guildford



© Crown Copyright 2020. Guildford Borough Council.
Licence No. 100019625.

This map is for identification purposes only and should
not be relied upon for accuracy.

Print Date: 19/10/2020



Not to Scale



GUILDFORD
BOROUGH

20/P/01163 Holy Trinity Parish Office, 5 Trinity Churchyard, Guildford



Not to scale



App No: 20/P/01163
Appn Type: Full Application
Case Officer: Becky Souter
Parish: Holy Trinity
Agent : Veronica Cassin
RPS Group
20 Farringdon Street
London
EC4A 4AB

8 Wk Deadline: 09/09/2020

Ward: Holy Trinity
Applicant: Rev Cotton
Holy Trinity and St Mary's
PCC
Holy Trinity Parish Office
5
Trinity Churchyard
Guildford
GU1 3RR

Location: Holy Trinity Parish Office, 5 Trinity Churchyard, Guildford, GU1 3RR

Proposal: Replacement of 8 windows to the front elevation.

Executive Summary

Reason for referral

This application has been referred to the Planning Committee because more than 20 letters of support have been received, contrary to the Officer's recommendation.

Key information

The application relates to the replacement of eight windows across both the eastern and western elevations.

The application site is located within the urban area of Guildford and within the Guildford Town Centre Conservation Area. The application building is a locally listed building.

It is located within the setting of a number of listed buildings including the Church of Holy Trinity a Grade I listed building, 162 High Street and 9 - 16 Trinity Churchyard all Grade II listed buildings.

The site is within an Area of High Archaeological Potential. There is an Article 4 direction on the conservation area, removing permitted developments rights, including replacement windows.

Summary of considerations and constraints

The main consideration in this case is the impact of the proposal on the character of the building and the character and appearance of the historic environment.

The replacement windows are constructed from powder-coated aluminium, with stuck-on glazing bars also constructed from powder-coated aluminium, and have thinner, flatter frames, transoms and mullions and screen films. The windows are double glazed with bottom-opening casements, in contrast to the previously single glazed top-opening casements in the original windows. There is currently a clear mismatch between the detailed design of the original and new windows in the building (retrospectively approved by Planning Committee in May 2019) which is evidently visible on approach to the building. In granting approval for the three windows already replaced, the Planning Committee caveated their decision by stating in an informative: "The applicant is advised that in approving this application the Council has had regard to the special circumstances

of the nature of the development. However, given the harm identified it is unlikely that any future applications for a similar development would be considered acceptable." This proposal seeks permission to replace the remaining 8 windows across the building with the same style of windows as approved by Committee. The Council's Conservation Officer considers that the existing replacements have caused harm and that unifying the appearance with more of the same units would increase the harm to significance of the building and the setting of the surrounding heritage assets. A number of public benefits have been put forward by the applicant, however, these do not outweigh the harm identified.

For these reasons, it is concluded that, the development fails to preserve the setting of the grade I listed building and fails to preserve or enhance the character and significance of the Town Centre Conservation Area and the locally listed building. The harm is not outweighed by an appropriate public benefit and thus fails to satisfy the requirements of the Act and the NPPF 2019. The development is also contrary to policies D3 of the LPSS, 2015-2034 and HE4 and HE7 of the saved Local Plan, 2003.

RECOMMENDATION:

Refuse - for the following reason(s) :-

1. The proposal would, by virtue of the design and profile of the replacement windows, in relation to the introduction of powder-coated aluminium with stuck on glazing bars and double glazing, result in unacceptable harm to the character and significance of the locally listed building and the Town Centre Conservation Area, as well as the setting of the Grade I Listed Building. The development results in less than substantial harm to the significance of the designated heritage asset and its setting (the level of this harm is at the higher level). No public benefits which outweigh the harm identified have been put forward. The proposal is therefore contrary to policies D3 of the LPSS, 2015-2034, HE4 and HE7 of the saved Local Plan, 2003, and paragraphs 193 to 202 of the NPPF, 2019. Due regard has been given to section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Area) Act, 1990.

Informatives:

1. This decision relates expressly to drawings: Unnumbered Site Location Plan; Unnumbered Block Plan; 01; 02; 03 Rev A and 04 received on 15/07/2020.
2. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:
 - Offering a pre application advice service
 - Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application
 - Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

Pre-application advice was not sought prior to submission and there are significant objections to the application that minor alterations would not overcome, it was not considered appropriate to seek amendments through the course of this application.

Officer's Report

Site description.

The application site is located within the urban area of Guildford and within the Guildford Town Centre Conservation Area. The application building is a locally listed building.

It is located within the setting of a number of listed buildings including the Church of Holy Trinity a Grade I listed building, 162 High Street and 9 - 16 Trinity Churchyard all Grade II listed buildings.

The site is within an Area of High Archaeological Potential. There is an Article 4 direction on the conservation area, removing permitted developments rights, including replacement windows.

Proposal.

Replacement of 8 windows to the front elevation.

Relevant planning history.

Reference:	Description:	Decision Summary:	Appeal:
19/P/00362	Replacement of three windows on the ground floor of the west elevation of the Trinity Centre (retrospective application).	Approve 23/05/2019	N/A
18/P/02073	Proposed replacement of windows on the west elevation of the Trinity Centre (part retrospective).	Take no further action 16/11/2018	N/A

Consultations.

Amenity groups/Residents associations

Guildford Vision Group:

- The windows will match the existing new windows for which planning permission was granted.
- The new windows will replace the unsatisfactory old windows and improve the working environment and thermal efficiency.
- The proposal will help the Centre remain a viable and very useful community asset.

- The impact of the change in the conservation area is marginal, the new windows improve the area, which has a mish-mash of window styles in any event.
- The lower maintenance costs will benefit the charity.

Third party comments:

50 letters of support have been received outlining the following positive comments:

- Every effort is being made to replace the previous windows with new windows which are visually similar to the pre-existing ones.
- From a distance the windows will appear similar both visually and in terms of materials. The glass panels in some of the existing windows are of mixed opaque design, having been replaced without attention to the detail now being given.
- Ensuring that the Trinity Centre looks good and is a valued asset serving the community is critical. The present windows could well impact on the church's ability to gain income from lettings and could result in loss of a well used community asset.
- The replacement windows will improve sound insulation thereby reducing potential noise disturbance to neighbours.
- 'Like-for-like' replacements of architecturally mundane fittings should not be allowed to trump conservation measures which improve the energy efficiency of buildings and do not compromise the conservation area.
- The existing windows do not close properly which causes heat wastage from the building and is a poor advertisement for a community facility.
- The proposal is a cost-effective solution, environmentally based, which would improve the outward appearance of the building and address health and safety concerns.
- The proposal will avoid wasting the money that has already been incurred in purchasing the windows [Officer note: This is not a material planning consideration.]
- The present windows are in a poor state of repair and dangerous.
- The new windows have will need no, or little, maintenance.
- There are situations where new windows should replicate the originals, but this is not one of them.
- Consent has already been given for a number of new doors and windows to be fitted in the Centre. Matching the new windows to the three already consented to will give some needed uniformity to the facade.
- It is important to recognise that the existing iron windows do not date from the time when the Trinity Centre was built in 1909. These are replacements from circa 1938.
- Section 5.2 of the Town Centre Conservation Area Character Appraisal of 2006 says that a proposed enhancement is "to encourage the continued use and future repair of the existing parish hall on the north-east side".

Planning policies.

National Planning Policy Framework (NPPF), 2019:

Chapter 16: Conserving and enhancing the historic environment.

Guildford Borough Local Plan: Strategy and Sites (LPSS), 2015-2034:

D1: Place-shaping.

D3: Historic environment.

Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007):

G1	General Standards of Development
G5	Design Code
HE4	The Setting of Listed Buildings
HE7	New Development in Conservation Areas

Supplementary Planning Documents

Guildford Town Centre Conservation Area Character Appraisal, 2006.

Planning considerations.

The main planning considerations in this case are:

- the impact on the character of the building and the character and appearance of the historic environment
- the impact on neighbouring amenity

The impact on the character of the building and the character and appearance of the historic environment

Holy Trinity Parish Office is located within Guildford Town Centre Conservation Area with its west facing elevation facing the Church Yard and the grade I listed Holy Trinity Church. It is of note that the Article 4 direction, removes various permitted development rights, and therefore, replacement of these three windows require planning permission, even though it is not a statutory listed building. The impact on the Conservation Area, setting of Grade I listed building and the significance of the locally listed building is a material consideration.

Statutory provision:

Given the proximity to several listed buildings and the site's location within the designated conservation area, the statutory obligations found in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 apply.

Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 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

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

NPPF provisions:

The NPPF 2019 states that heritage assets should be conserved in a manner appropriate to their significance. Chapter 16 of the National Planning Policy Framework addresses proposals affecting heritage assets. Para 193 sets out that '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'. The NPPF sets out that the local planning authority should identify and assess the particular significance of any heritage asset...They should take this

assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

Paras 195-199 set out the framework for decision making in planning applications relating to heritage assets and this application takes account of the relevant considerations in these paragraphs.

Para 197 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.

Local Plan policies:

Policy HE4 indicates that planning permission will not be granted for development that adversely affects the setting of a listed building by virtue of design, proximity or impact on significant views.

Policy HE7 indicates that new development in a Conservation Area should preserve or enhance the character or appearance of the conservation area and that consideration should be given to a number of criteria, including the need to apply a consistently high standard of designs.

Policy D3 of the emerging local plan indicates that the historic environment will be conserved and enhanced in a manner appropriate to its significance. Support will be given to development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the Borough's heritage assets and their setting and make a positive contribution to local character and distinctiveness. Works that would cause harm to the significance of a heritage asset, whether designated or non-designated, or its setting, will not be permitted without a clear justification to show that the public benefits of the proposal considerably outweigh any harm to the significance of special interest of the heritage asset in question.

Significance of the heritage assets:

Guildford Town Centre Conservation area is notable for its many listed buildings, including a large number of grade I and II* listed buildings. There are also a number of locally listed buildings in the conservation area. This part of the conservation area is characterised by a steep, cobbled High Street divided into long, narrow plots stretching out behind. The Conservation Area Character Appraisal describes this part as Character Area 2 with a mixed character of varied rooflines and architectural details, mixture of materials and buildings periods, developed over the centuries which help give the area its distinctive character. The essential features such as topography, views and vistas give the local distinctiveness to the conservation area, and the notable views include areas along the narrow streets and alleys leading of the High Street.

The Conservation Area Appraisal makes specific reference to the Church of Holy Trinity (grade I c.1540 and 1763), and identifies it as a key building within the Conservation Area. This brick grade I listed church brought London's influence into the area, and is designated as one of the focal building in the conservation area, while the view of the narrow alley of Trinity Churchyard leading to the Trinity Church Hall is designated as an important view on the Character Area Map 2 of the appraisal.

The appraisal further notes a complex variety of materials which help give the area its distinctive character. It notes that there are many examples of window design according to the age and style of the building. The predominant window type in the conservation area is the double timber vertically sliding sash, usually divided into six or eight panes. These reflect the 18th and 19th century taste for classical architecture and occur in the majority of the listed buildings in the conservation area.

The proportion of these windows gives an elegant vertical emphasis to the buildings.

The Town Centre Conservation Area Appraisal points out various 'Issues and Threats' to the character of the Conservation Area, which include loss of historic features on some buildings as well as over-enthusiastic restoration and alterations of buildings.

The arrangement of the listed and locally buildings and the way they relate to the Church, their historic and attractive character, the encountered vistas of the Church and building in Trinity Churchyard, all contribute to the significance of the conservation area and as such the significance of the conservation area, insofar as it relates to the application building, is primarily associated with the architectural detailing with regard to traditional patterns of fenestration.

In accordance with the NPPF the application building (Holy Trinity Church Hall), a locally listed building, is a non-designated heritage asset and is described as follows:

“Hall, foundation stone dated 1909. 2 storeys, red brick with pitched slate roof with 2 small, domed ‘belfries’ to ridge. Near-symmetrical facade fronting onto churchyard. To either end low brick parapets with stone coping over 2 entrances. That to left the main entrance with date stone. That to right projects forward and is wider. To left hand parapeted section projecting stringcourse to top of both floors. To 1st floor window of three multi-pane timber casements with segmental arched fanlight over, stone cill, & segmental brick arch above whole. To ground floor large semi-circular brick and stone arch with stone key stone and drip-mould, over recessed entrance. Timber and glazed doors with steps up. Right hand parapeted section similar but with smaller central doorway with brick Tudor arch and timber pentice porch. Recessed timber & glazed door. Flanking casement windows with stone lintels and sills. Above, a dormer window with arched heads to lights, flat roof with small gable to centre and ‘slate hung’ sides. To centre of building pair of gables with brick parapets breaking through the eaves. Below these to 1st floor timber casement windows with arched top lights, stone lintels and sills. Between and to either side of these, 3 further similar windows without the arched top lights. Windows of latter design across ground floor. Between ground and 1st floors projecting string course continuous to that to end parapeted sections.”

The Holy Trinity Church Hall is an early 20th century building built as parish rooms for Holy Trinity Church and opened in 1909. It is a red brick building, and typically of a public building of this era has large windows that are an essential part of the historic fabric and aesthetics of the building. Significance of a heritage asset is derived from four elements; evidential value, historic value, aesthetic value and communal value. The application building's significance lies predominately in its historic and aesthetic values and the large distinctive windows are an essential part of the aesthetics of the building contributing greatly to its significance.

Effect of the replacement windows on significance:

The application building is part of a terrace surrounding Holy Trinity Churchyard. As well as being a locally listed building, it is within the Town Centre Conservation Area, and within the vicinity of a number of listed buildings, as set out above; the settings of which must also be regarded. Historic buildings, all of which retain the majority of their original character surround three sides of the churchyard and there is a consistency in the historic glazing, which contributes greatly to the setting of the grade I listed Church and the character of the conservation area.

The windows are an integral part of the design of the building, they are timber framed with heavy timber moulded mullions and transoms, the majority with metal multi paned inserts. Historic England Guidance Note Traditional Windows, Their Care and Repair (2017) states that “The loss of traditional windows from our older buildings poses one of the major threats to our heritage”, as often replacements do not match the sections and proportions of historic joinery which is most definitely the case in this instance.

The 8 new windows being proposed are, as identified in the supporting heritage statement, "an approximation of those in situ", being powder coated aluminium, have thinner, flatter frames, transoms and mullions, different means of opening and fittings, double glazing with stuck on glazing bars and screen films. They do not share any of the historic characteristics of the original windows and appear much flatter with much thinner sections and bottom opening lights. Justification for the proposed replacement windows, as set out in the submitted heritage statement, can be broken down into the following main points:

- Improvement in thermal efficiency of the building
- Existing windows are a health and safety risk
- Unifying the fenestration with the 3 units that were granted approval in 2019
- Cost of having to replace units that have already been purchased

The Council's Conservation Officer has reviewed the proposals and makes the following comments on the points of justification set out above.

Improvement in thermal efficiency

The Conservation department has previously commented that improvements to the thermal efficiency of the property could be achieved through the refurbishment and retrofitting of the existing units or their replacement with replica frames and this remains the case.

The applicant claims in their supporting heritage statement that following the retrospective approval of the 3 units in 2019 the applicant sought to secure a contractor who could repair the existing windows, and that this has improved almost impossible, with many contractors refusing to quote for the repairs on the basis that the job is too small, or that they don't undertake joinery repairs. They have also stated that "the wholesale replacement of the existing units with timber and metal replicas are extremely expensive and beyond the financial scope of the parish" It also goes on to say that "estimates for the repairs... are equally as expensive and would not incorporate double glazing, so the costs of secondary glazing would have to be added to the figures provided for the repairs".

The situation in which the applicant finds themselves is acknowledged and whilst the Council is sympathetic to the situation and understand the cost involved, it must be stressed that cost is not a material consideration in such matters. Nevertheless, if such matters were to be considered in the interest of public benefit, no evidence (in the form of quotes and email correspondence between the applicants & tentative contractors) has been provided to substantiate the applicant's claims.

Existing windows are a health and safety risk

The applicant has provided photographic evidence which demonstrates that there are a number of units which are in a poor condition, with some units having panes of glass being taped in place. Thus, there is a concern with the precariousness of the glazing should it fall on to the path below. Whilst this is not disputed that this presents an issue which needs to be acted upon promptly, this could be just as easily resolved with either the refurbishment and retrofitting of the existing unit or their replacement with replica frames. The applicant also makes reference to the user friendliness of the existing units, stating that the hopper type of opening is difficult for users of the premises to open due to rust, and thus there is a fear that those groups which currently hire the facilities will consider alternative venues if they are unable to ventilate/insulate the building according to their needs. Given that we would wish to continue to see the property being utilised, it is fair to accept that this is somewhat of an issue. However, it is likely that this problem has arisen from lack of basic and consistent maintenance and such an issue could arise in the proposed units should they not be suitably maintained. Further, this issue has the potential to be resolved through targeted repairs, or the replacement of the hoppers.

Unifying the fenestration with the 3 units that were granted approval in 2019

Permission was granted retrospectively in May 2019 for the installation of 3 replacement window units within the host property. During the course of this application Conservation raised concerns with the proposal and concluded the following: *"The newly installed windows cannot be supported in terms of their design and detailing, and due to the impact, the change in their appearance would have on the character and appearance of both the building, and the setting of the adjacent heritage assets. They would detract from, and are harmful to, the character and appearance of the locally listed building and the conservation area."* Despite these concerns, this application was granted consent via the committee process with an advisory note added to the decision notice which stated the following: *"The applicant is advised that in approving this application the Council has had regard to the special circumstances of the nature of the development. However, given the harm identified it is unlikely that any future applications for a similar development would be considered acceptable."*

Generally speaking, Conservation welcomes any effort to unify fenestration across a property's elevation to provide visual consistency, but not at the expense of causing harm to its character and appearance, the setting of adjacent heritage assets or the conservation area. Whilst it is acknowledged that the existing situation results in a clear and evident mismatch between the detailed design of the original windows and those which were replaced, it seems counterintuitive to resolve the issue through the disposal of historic and architecturally significant fabric, particularly when it would result in an inelegant and incongruous addition that would cause harm to not only to the host locally listed building, but also the setting of the grade I and II listed buildings, as well as failing to preserve or enhance the character and significance of the Town Centre Conservation Area. Further, it should be noted that the replacement windows installed on site last year do not currently offer consistency, there are white glazing bars attached on one window but on another they are missing and as such there are black outlines where the bars should be attached. As a result, the windows appear of different design on site and there is question over any consistency of the proposed frames.

The supporting heritage statement does state that this application has been submitted in the knowledge that the conservation team have advised that the replacement windows are not the 'ideal' solution for the building. The statement also admits that the appearance of the building would change, however does go on to argue that the magnitude of change would be limited, however, for the reasons noted above this is not a view supported by Conservation.

Cost of having to replace units that have already been purchased

The situation in which the applicant finds themselves is acknowledged and whilst the Council is sympathetic to the situation, had they sought advice from the Local Planning Authority prior to the purchase of the windows then this issue would have been avoided. Further, this is not a material consideration and thus should not be used to help justify their case.

Having given consideration to all of the above, there is no new information or evidence to lead Conservation to determine that the conclusions previously reached regarding the impact of the windows should be re-evaluated. Those conclusions being:

"It is my professional view that the newly installed windows cannot be supported in terms of their design and detailing, and due to the impact the change in their appearance would have on the character and appearance of both the building, and the setting of the adjacent heritage assets. They would detract from, and are harmful to, the character and appearance of the locally listed building and the conservation area."

In fact, given that this application is now seeking to replace a greater number of units it is asserted that the resultant harm, which would be categorised as 'less than substantial harm' would be much greater, than the previous application. It is noted that Section 5.2 (Enhancements) of the Town Centre Conservation Area Appraisal (CAA) states: "*Improve maintenance of Holy Trinity Churchyard and encourage the continued use and future repair of the existing parish hall on the north-east side.*" Whilst the Council is supportive of the continued use of the building, the CAA lists this as an opportunity for enhancement and will only support repairs to parish hall these will only be accepted where the repairs are appropriate to the historic significance of the building and its surroundings and are sensitively designed.

In line with statute, policy and case law, considerable weight and importance must be given to the presumption against granting permission of development that would harm the character or appearance of a conservation area or the setting of a listed building. If less than substantial harm is found, of whatever magnitude, considerable weight needs to be given to the desirability and preserving the setting of the asset. In this case there would be a significant degree of harm not only to the host locally listed building, but also the setting of the grade I and II listed buildings, as well to the special character and appearance of the Town Centre Conservation Area.

Balancing exercise

Paragraph 196 of the NPPF advises that when considering less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits. The applicant has provided reasons for the replacement and the following can be seen as the public benefits of the replacement windows:

- The existing windows are in a poor state of repair with panes of glass taped in place within the glazing bars and as such there is concern that the windows are a safety hazard for the pedestrians using the public footpath. The development makes the public footpath safer for all pedestrians. Officers consider that health and safety concerns should be given weight however this is considered to be limited as it has not been demonstrated that repairing the original windows would not overcome this concern.
- The maintenance of the building ensures that it continues to serve the parish of Holy Trinity Church and the wider community in this part of Guildford. The NPPF cites the use of a building for its optimum viable use as a public benefit. The application proposal will help the Trinity Centre to continue to provide the civic and cultural role it was intended to serve when it was constructed in 1910. Officers consider that this should be given limited weight, as no evidence has been provided which indicates that the continuing use of the building is in jeopardy if the windows are not replaced, and that this could not be overcome by utilising secondary glazing on the original windows.
- The new windows would provide thermal efficiency and improvements in energy efficiency. Officers consider that this is a private benefit and not public and as such is not relevant to the balance. Further, this benefit could be achieved by installing secondary glazing and/or repairing the original windows.
- Repair of the existing windows is not a financially viable option and the proposed replacement windows were purchased in 2018 and to not install them would result in wasted cost to the applicant. Officers consider that this is a private benefit and not public, therefore, it is not relevant to the balance. Furthermore, the windows were purchased prior to any discussion with the Council over the likely acceptability of replacement.

In line with the Planning (Listed Building and Conservation Area) Act 1990 special regard is given to preserving the setting and character of heritage assets. The harm to the heritage assets identified is considered to be within the 'less than substantial' category, however, it would be at the higher end of this scale. Whilst it acknowledged that the existing windows are in a poor state of repair and that the proposal would have some public benefits in the improved safety of the windows and maintenance of the building to ensure its optimum viable use, little evidence has been submitted to demonstrate that these benefits could not also be achieved through repair and refurbishment of the windows nor that the continuing use of the building is in jeopardy. In this respect, no public benefit has been identified that would outweigh the harm caused to the significance and character of both designated and non-designated heritage assets.

Following this balance of the harm to the significance of the heritage assets identified, it is concluded that the public benefits identified do not outweigh the level of harm. The application, therefore, fails to satisfy the requirements of the Act and the provisions of the NPPF 2019. The development is also considered to be contrary to policies, D3 of the LPSS, 2015-2034 and HE4 and HE7.

The impact on neighbouring amenity

The windows replace existing windows in the same position and use; therefore no impact on neighbouring amenity arises from the works. The proposal complies with policy G1(3) of the saved Local Plan, 2003.

Conclusion.

The proposal would, by virtue of the unacceptable design and detailing, result in an incongruous addition to this historic building and harm the character and significance of the locally listed building which is a non-designated heritage asset. Consequently the proposal fails to preserve or enhance the character and significance of the Town Centre Conservation Area. As the impact relates to changes in the fenestration, the development would result in less than substantial harm to the significance of the designated heritage assets and their setting, the level of harm would be on the higher end of the scale. There are no public benefits to the proposal which outweigh the harm identified. As a result, it is concluded that the development fails to satisfy the requirements of the Act and the NPPF, 2019. Further, the development fails to be in compliance with policies D3 of the LPSS, 2015-2034, HE4 and HE7 of the saved Local Plan, 2003. The application is therefore recommended for refusal.