

HOLT - PF/25/2133 (Application 1) - Replacement windows (retrospective) at 2 The Beeches, Station Road, Holt, Norfolk, NR25 6AU

HOLT - LA/25/2134 (Application 2) - Replacement windows (retrospective) at 2 The Beeches, Station Road, Holt, Norfolk, NR25 6AU

EXECUTIVE SUMMARY

The Development Committee are being asked to determine two separate planning and listed building applications which relate to replacement windows at 2 The Beeches, Station Road Holt.

Given that there are similar matters affecting both applications, a combined report has been produced so as to reduce duplication. Nonetheless, separate decisions will be required for Application 1 and Application 2.

This report sets out:

- the development proposed;
- identifies the responses received from consultees and public representations;
- Runs through the main planning considerations; and
- Provides an officer recommendation

It should be noted that, although these applications only relate to Flat 2, there are numerous upvc windows already installed within the listed building across multiple flats, seemingly without appropriate permissions or consents first being in place and which are subject to ongoing enforcement considerations. Given the retrospective nature of these applications, there are clearly wider implications in terms of planning enforcement beyond Flat 2 (which is the subject of these applications) and which is why these applications are before the Committee for determination.

The planning and listed building considerations within this report apply to both applications (unless stated otherwise)

Application 1: PF/25/2133	Application 2: LA/25/2134
Householder Planning Application	Listed Building Consent Application
Target Date: 19 th December 2025	Target Date: 19 th December 2025
Extension: 30 th January 2026	Extension: 30 th January 2026
Case Officer: Harry Gray	Case Officer: Harry Gray

RELEVANT PLANNING CONSTRAINTS

Residential Area
Grade II Listed Building
Within a settlement boundary
Within a Conservation Area
Landscape Character Type - Wooded Glacial Ridge.

RELEVANT PLANNING HISTORY

None – other than the applications subject to these reports

THE APPLICATION(S)

Seek retrospective planning permission and listed building consent to retain six replacement windows at 2 The Beeches, a first-floor flat within a Grade II listed building and located within the settlement boundary and conservation area of Holt. The first floor of the building is split into two flats. The windows for both flats have been replaced and are subject to live enforcement cases, however, only No.2 has submitted applications for their retention.

REASON FOR REFERRAL TO COMMITTEE

At the request of the Development Manager on the basis that decisions made in respect of these planning and listed building applications will have a direct bearing on the direction on-going enforcement cases affecting not only the property subject of these applications but also on the wider building (where many other windows have been replaced without either listed building consent or planning permission). Given the range of comments, both in support and objection, it is considered important that the Development Committee makes the final decision in the wider public interest.

PARISH/TOWN COUNCIL

Holt Town Council - Support

CONSULTATIONS

Conservation & Design (NNDC) – Object – a copy of the response is attached in full at Appendix 1.

REPRESENTATIONS

To date, **six** representations have been received following publicity via site notice and advertisement in the local press in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

Five representations **support** the applications and raise the following matters (summarised):

- In keeping design.
- Energy efficiency and environmentally/eco friendly.

One representation **objects** to application PF/25/2133 and raises the following matter (summarised):

- See no reason to change the existing windows.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to:

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

Having considered the likely impact on an individual's Human Rights, and the general interest of the public, refusal of this application as recommended is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER

The application raises no significant crime and disorder issues.

EQUALITY AND DIVERSITY ISSUES

The application raises no significant equality and diversity issues.

LOCAL FINANCE CONSIDERATIONS

Under Section 70(2) of the Town and Country Planning Act 1990 the council is required when determining planning applications to have regard to any local finance considerations, so far as material to the application. Local finance considerations are not considered to be material to this case.

RELEVANT POLICIES

North Norfolk Local Plan (adopted December 2025)

CC1 - Delivering Climate Resilient Sustainable Growth

CC3 - Sustainable Construction, Energy Efficiency & Carbon Reduction

CC13 - Protecting Environmental Quality

SS1 - Spatial Strategy

HC7 - Parking Provision

ENV6 - Protection of Amenity

ENV7 - Protecting & Enhancing the Historic Environment

ENV8 - High Quality Design

HOU6 - Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation

Holt Neighbourhood Plan (August 2023)

Following a public referendum on Thursday 29 June 2023, the Holt Neighbourhood Plan has been brought into legal force. It now forms part of the statutory Development Plan for North Norfolk.

HOLT1 - Design Guidance

Material Considerations

National Planning Policy Framework (NPPF):

Chapter 2 - Achieving sustainable development

Chapter 4 - Decision-making

Chapter 12 - Achieving well-designed places

Chapter 15 - Conserving and enhancing the natural environment

Chapter 16 - Conserving and enhancing the historic environment

Supplementary Planning Documents and Guidance:

North Norfolk Design Guide Supplementary Planning Document (SPD) (December 2008)

Landscape Character Assessment Supplementary Planning Document (January 2021)

s16(2) of the Planning (Listed Buildings & Conservation Areas) Act, 1990

OFFICER ASSESSMENT

Main issues for consideration:

- 1. Principle**
- 2. Design and impact on the Grade II Listed Building and surrounding Conservation Area**
- 3. Amenity**
- 4. Highways (parking)**
- 5. Other matters**

1. Principle (Applicable to PF/25/2133 only)

The dwelling is located within the settlement boundary of Holt identified under Policy SS 1 of the adopted Local Plan where the principle of extensions to existing dwellings is considered acceptable subject to compliance with other relevant Core Strategy policies. Whilst not strictly an extension, but rather an alteration, this policy would remain relevant.

2. Design and impact on the Grade II Listed Building and surrounding Conservation Area

Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that "In considering whether to grant listed building consent for any works the local planning authority...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 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that "In considering whether to grant planning permission...for development which affects a listed building or its setting, the local planning authority...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 Buildings and Conservation Areas) Act 1990 sets out that "In the exercise, with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

The Beeches is a Grade II listed building (formerly known as The Shrublands) and occupies a relatively prominent position within the Holt Conservation Area. The building currently comprises of 4 flats, two at first floor and two at ground floor.

Conservation & Design Officer input into assessing the applications has been provided. In the first instance, it is noted that the application fails to describe the significance of the heritage assets affected; namely the grade II listed host building and the wider Holt Conservation Area. There is no assessment of the age and value of the windows that have been removed and no meaningful appraisal of their condition or ability to be repaired and upgraded rather than replaced. As a result, the alterations that have been undertaken cannot be considered compliant with paragraph 207 of the NPPF.

The Conservation & Design Officers notes that the limited photograph evidence available of the windows that have been removed would suggest that the windows were the original c19 windows, rather than modern replicas, and would therefore have held intrinsic historic and evidential value, with their loss having a detrimental impact upon the overall significance of the listed building.

Furthermore, the Conservation Officer observes that, by reason of the replacement plastic windows having a more standardised form, with an artificial, uniform texture, and having thicker framing, relatively flat sections of plastic, modern glass and more prominent and conspicuous position in the reveal, the replacement windows are considered to be at odds with the classical, symmetrical fenestration of the early-19th-century building, from which it draws part of its significance. It has been concluded that the proposal would result in harm to the heritage assets.

The only exception to this is window 2, which as it is a casement and located on a less prominent side elevation with no other windows immediately around it, is less stark, despite its inappropriate trickle vents.

The level of harm to the significance of the heritage assets has been quantified as 'less than substantial' to the significance of the Grade II listed building and the character and appearance of the surrounding conservation area. However, as paragraph 212 of the NPPF reminds us, great weight should be given to the assets' conservation, irrespective of the level of harm. As per paragraph 215, 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.

The Committee will note the applicant's case in support of the application (as set out in Section 5 below).

Whilst the Local Planning Authority (LPA) recognises the motivation of replacing single-glazed windows with double glazing in terms of improved energy and thermal efficiency and to aid fully functioning windows, the weight to be attributed to these benefits would be a matter for the decision maker to decide whilst also acknowledging that alternative timber options may be available, which would better reflect the form and character of the original windows.

The applicant has provided examples of modern/coloured windows that have been installed within other Listed Buildings and Conservation Area of Holt. This is noted, and it is unclear whether or not the examples provided have benefitted from planning permission (or listed building consent). However, each individual planning application must be considered upon its own merits and accordingly, the current application has been assessed based upon the particular merits of this Listed Building and its position within the Conservation Area.

In this particular case, harm to the listed building has been identified through the insertion of modern upvc window frames and glazing. Absent sufficient public benefits to outweigh the harm identified, the proposal would be considered unacceptable and would therefore be contrary to Policies ENV7 and ENV8 of the adopted North Norfolk Local Plan, Paragraphs 207, 212 and 215 of the National Planning Policy Framework, s16(2) of the Planning (Listed Buildings & Conservation Areas) Act, 1990 and the North Norfolk Design Guide.

3. Amenity (Applicable to PF/25/2133 only)

As the proposal is for the retention of the replacement of the existing windows and not for the introduction of new windows, it is considered that an increase in residential amenity impacts would not occur. The proposal would therefore be compliant with the aims of Policy ENV8 of the adopted Local Plan.

4. Highways (parking) (Applicable to PF/25/2133 only)

The proposal would accord with the requirements of Policy HC 7 of the adopted Local Plan.

5. Other Matters

The applicants case in support of their proposal is based primarily on three aspects:

- i. The applicants state that they were not aware that they had purchased the lease on a Listed building and they say neither were their estate agents, solicitors or landlords. The applicant notes that if you search for listed buildings in Holt, The Beeches is not Listed and is referred to as Shrublands which they say has not existed for 35 years. The applicant considers that all of this could have been avoided if the name change had been updated in 1990 when the Beeches was developed and certainly there should be a plaque placed on the building declaring its listed status. That in itself would have avoided any confusion, according to the applicant.
- ii. The applicant sets out that all of the windows installed are A Rated. The applicant reminds the Council that it claimed to be the first Council in the county to recognise the Climate emergency and launched a Net Zero Action Plan reducing emissions at every opportunity. Yet the same people are asking a retirement complex where the average age of the residents is over 80 to ignore their advice and tolerate draughty ill-fitting windows and ignoring completely the health and safety of their residents. The applicant says that by replacing their rotten, draughty and frankly dangerous timber windows with A rated Upvc they improved the efficiency by more than 80% and seriously reduced their fuel bills to an affordable level.
- iii. The applicant sets out that they replaced their own windows in woodgrain white Upvc to improve their quality of life and reduce their outgoings. The applicant says that their service charge has increased by more than 50% in three years and many are deeply concerned about increasing cost and striding to live within their pensions. The new windows are as close to matching the old as can be achieved with modern materials, even with timber glazing you cannot upgrade the old ones as the only ways you can improve them to anything like the level of UPVC is with secondary glazing with all of the obvious disadvantages they display, resulting in

unsightly extra glazing bars and difficult access for both ventilation and in case of fire.

In response to the applicants comments above, firstly it is important for the Committee to understand that not knowing that a building is Grade II listed is not a valid legal defence if you carry out unauthorised works, as this offence is one of strict liability. The only legal defence is showing that the works were urgently needed in the interest of health and safety or for the preservation of the building, and that this was the absolute minimum work required. Officers understand that this is not the case here.

The applicant refers to the Council's website as the source of inaccurate listing data. The Council does not maintain the National Heritage List for England, that task falls to Historic England who compile the list and NNDC signpost from their website to the Historic England maintained website. However, the applicant is correct that, on the National Heritage List for England, The Beeches is not listed and instead the property is recorded as Shrublands, 28 Station Road, presumably reflecting the name of the property at the time of first listing in 1983. Whilst Officers do recognise the frustration with the property changing names adding to confusion when seeking to establish listed status, it is nonetheless the responsibility of the purchaser (and their solicitor where applicable) to do the necessary due diligence when purchasing a freehold or leasehold property - Caveat emptor "let the buyer beware".

In respect of the windows that have been installed, Officers recognise the energy performance benefits from double glazed windows compared with rotten or draughty single-glazed windows. The energy performance benefits are matters that are capable of attracting positive weight in the planning balance. In addition, Officers note the comments from the applicant that the upvc windows they installed are as close a match as possible and that they could only have achieved the energy performance improvements if they had installed secondary glazing, which would have added to emergency escape difficulties for the elderly people living in the building. It is very difficult for Officers to provide any meaningful commentary as to whether the original timber windows were beyond repair and/or that secondary glazing could have been installed to improve thermal performance. The original windows had been removed before any opportunity for Conservation & Design Officers to explore alternative solutions had been considered (including replacements using timber).

Finally, it should be noted that there are numerous upvc windows already installed within the listed building, seemingly without appropriate permissions or consents. It must also be noted that this application only pertains to the six windows associated with Flat no.2 and not no.1, the other first-floor flat or the other flats within the building. Other flats are subject to enforcement cases, and it is considered that the breaches are considered likely to harm the significance of the Grade II listed building and wider conservation area.

Planning Balance and Conclusion

The proposal would result in 'less than substantial' harm to the host Grade II Listed Building and wider conservation area, and without sufficient material considerations in favour to outweigh the harm, the replacement windows would be considered unacceptable. As a result, this application is contrary to Policies ENV7 and ENV8 of the adopted North Norfolk Local Plan, Paragraphs 207, 212 and 215 of the National Planning Policy Framework, s16(2) of the Planning (Listed Buildings & Conservation Areas) Act, 1990 and the North Norfolk Design Guide.

RECOMMENDATIONS:

HOLT - PF/25/2133 (Application 1) - Replacement windows (retrospective) at 2 The Beeches, Station Road, Holt, Norfolk, NR25 6AU

REFUSAL for the following reason:

1. By reason of their standardised artificial texture, uniform sheen, thicker and flatter framing, modern glazing, and because they will not age and weather in the same way as the original timber windows, it is considered that the installed plastic windows constitute inauthentic contemporary additions which appear unduly conspicuous within the host grade II listed building, failing to preserve or enhance its refined and elegant character and appearance. With the building also lying within the Holt Conservation Area, which is characterised by its classical Georgian architecture, it is considered that the removal of the former windows and their replacement with inauthentic equivalents, has resulted in less than substantial harm being caused to existing designated heritage assets. With there being insufficient public benefits to outweigh the identified harm, and with the submission failing to properly describe the significance of the assets involved, the proposed development is therefore considered contrary to Local Plan Policies ENV7 and ENV8 of the adopted North Norfolk Local Plan, Paragraphs 207, 212 and 215 of the National Planning Policy Framework, s66(1) of the Planning (Listed Buildings & Conservation Areas) Act, 1990 and the North Norfolk Design Guide.

Final wording of reason(s) for refusal to be delegated to the Assistant Director – Planning

HOLT - LA/25/2134 (Application 2) - Replacement windows (retrospective) at 2 The Beeches, Station Road, Holt, Norfolk, NR25 6AU

REFUSAL for the following reason:

1. By reason of their standardised artificial texture, uniform sheen, thicker and flatter framing, modern glazing, and because they will not age and weather in the same way as the original timber windows, it is considered that the installed plastic windows constitute inauthentic contemporary additions which appear unduly conspicuous within the host grade II listed building, failing to preserve or enhance its refined and elegant character and appearance. With the building also lying within the Holt Conservation Area, which is characterised by its classical Georgian architecture, it is considered that the removal of the former windows and their replacement with inauthentic equivalents, has resulted in less than substantial harm being caused to existing designated heritage assets. With there being insufficient public benefits to outweigh the identified harm, and with the submission failing to properly describe the significance of the assets involved, the proposed development is therefore considered contrary to Local Plan Policies ENV7 and ENV8 of the adopted North Norfolk Local Plan, Paragraphs 207, 212 and 215 of the National Planning Policy Framework, s16(2) of the Planning (Listed Buildings & Conservation Areas) Act, 1990 and the North Norfolk Design Guide.

Final wording of reason(s) for refusal to be delegated to the Assistant Director – Planning

In the event of refusal of these applications, further consideration will be required in relation enforcement matters, to be delegated to the Assistant Director - Planning.