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**Application Details:**

Reference: PF/25/2133 & LA/25/2134 Officer: Mr Harry Gray

Location: 2 The Beeches, Station Road, Holt, Norfolk, NR25 6AU

Proposal: Replacement windows (retrospective)

**Consultee Details:**

Name: Alannah Hogarth

Dept: Conservation and Design (NNDC)

Reason: **The site is within a conservation area.**

**The application is for or could affect a listed building**

Advice     No Comment\*     Support     Object X

The Beeches is a Grade II listed building (formerly known as The Shrublands at the time of listing in 1983) that occupies a relatively prominent position within the Holt Conservation Area, both of which are considered designated heritage assets for the purposes of the NPPF. Having previously been a single dwelling, consent was granted in the late 1980s for the building to be subdivided into several flats. The current application relates to unauthorised works that have been carried out that affect the first-floor properties and seeks to regularise those at Flat 2 only.

Conservation & Design (C&D) are unable to support this application to retain the replacement windows for three primary reasons: -

1. In the first instance, 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. Beyond this, 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 para 207 of the NPPF.
2. The limited photographic evidence available gives no reason to suggest the windows that have been removed were modern replicas, there is a strong likelihood they were the original C19 windows that had intrinsic historic and evidential value, and as such their loss has had a detrimental impact upon the overall significance of the listed building.
3. By virtue of the limitations of plastic as a material, the replacement windows are more standardised in form, with an artificial, uniform texture. The thicker framing, relatively flat sections of plastic, modern glass and position in the reveal make them more prominent and conspicuous within the traditional context. Part of the significance of the building is derived from its classical, symmetrical, fenestration, thus the incongruous nature of the replacement windows is exacerbated by the fact that the original windows remain on the ground floor. 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 replacement of historic windows with uPVC is a significant threat to individual historic buildings and to the Conservation Area as a whole, as highlighted in the Holt Conservation Area Appraisal (2021). Changes to traditional fenestration causes the loss of historic fabric, alters the appearance and aesthetic value of a building and can also affect the historic fabric of the remainder of the building by changing its breathability. New windows can be obtrusive if set too close to the front of the wall, losing the play of light and shadow which adds interest to historic facades. It is, therefore, preferable to repair damaged windows and to undertake regular maintenance to ensure their enduring longevity.

Whilst it is understood that the rationale behind replacement hinged partly on improving thermal performance and occupant comfort, it is worth noting that there are many simple thermal improvement options available for timber windows such as draught-proofing, shuttering or secondary-glazing. In fact, there are a number of studies that suggest timber windows have a better overall thermal performance than uPVC. It is also possible to use double glazed timber sash windows, before resorting to plastic, which has a limited life span and cannot be re-used or recycled. Therefore, only limited weight can be given to these arguments.

C&D are, therefore, unable to support the application as it is considered to result in 'less than substantial' harm to both the listed building and the character and appearance of the conservation area. Any harm to a designated heritage asset must be supported by sufficient justification in addition to being outweighed by any public benefit to be derived from the scheme. In this case, there are no obvious public benefits to be had and so there is nothing to outweigh the identified harm. The application is, therefore, contrary to Local Plan policy EN8, paras 207, 212 & 215 of the NPPF, and s16(2) of the Planning (Listed Buildings & Conservation Areas) Act, 1990.

Date: 21/11/2025

\*Determine in accordance with the Development Plan, other material planning considerations and statutory duties