

DELEGATED FILE NOTE

CASE OFFICER: ...Mark Simmons.....

APPLICATION REFERENCE	BRIEF DESCRIPTION OF DEVELOPMENT	APPLICATION SITE
26/00216/LBC	Replace 3no. existing timber double-glazed windows to front elevation with Residence 9 Upvc double-glazed windows	104 Ridge Road Letchworth Garden City Hertfordshire SG6 1PT

Submitted Plan Nos

Location Plan Elevations plan

1.0 Policies

HE1	Designated heritage assets
-----	----------------------------

SECN16	Conserve + enhance historic environment
--------	---

2.0 Site History

- 2.1 **23/02329/LBC** - Replace existing flat, fibreglass extension roof with a similar roofing system but introducing simulated lead rolls and install two curved double-glazed rooflights to the same roof.

CCON 05.12.2023

23/02659/GEN - Windows at listed building.

25/00469/LBC - Replacement of existing front and back elevation windows.
R 01.05.2025

3.0 Policies

- 3.1 Policy HE1 of the North Hertfordshire Local Plan 2011 – 2031 is relevant as are the following paragraphs of Section 16 of the National Planning Policy Framework (Dec 2024):

- ☐ **135 c)** (*sympathetic to local character and history, including the surrounding built environment*),
- ☐ **207** (*local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting*)
- ☐ **210** (*desirability of new development making a positive contribution to local character and distinctiveness*),
- ☐ **212** (*great weight should be given to the asset's conservation*),
- ☐ **213** (*clear and convincing justification*), and
- ☐ **215** (*harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*).

4.0 Representations

- 4.1 **Letchworth Garden City Heritage Foundation** – No comments received.

Press & site notices – No comments received.

5.0 Planning Considerations

5.1 **Site and Surroundings**

- 5.1.1 Nos. 2 - 122 (evens) Ridge Road, Letchworth Garden City are grade II listed and are located within the Letchworth Conservation Area (LCA). The building and the LCA are designated heritage assets and the list entry for these properties reads as follows:

RIDGE ROAD 1. 5255 Birds Hill Estate Nos 2 to 122 (even) TL 2232 9/102-114 II GV 2.

1906 by B Parker and R Unwin. This pioneer estate was designed for the Garden City Tenants Limited and comprises 13 grouped terraces forming a cul-de-sac and village green layout. One and a half storeys. Mostly one window each with irregular frontages varied by arrangements of large and small dormers and gables. Tiled roofs with multi-form brick stacks. The centre feature of the village green layout is a giant gable taking up

Nos 100 and 102. Roughcast walls. Mullioned casement windows with tile labels and glazing bars (some windows altered). Recessed entrances with arched doorways. Included as the earliest estate layout of its type, and the prototype of all future council house developments in the country. The concept of a village green layout was put forward in 1898/9 and published by Parker and Unwin in "The Art of Building a House". The Westholm scheme (qv) was also based on this idea.

5.2 Proposal

- 5.2.1 The application is described as: *Replace 3no. existing timber double-glazed windows to front elevation with Residence 9 Upvc double-glazed windows.*

Historic England guidance entitled 'Traditional Windows: their care, repair and upgrading' published in 2017.

- 5.2.2 This guidance describes that assessing the significance of a window and understanding the contribution it makes to the significance of the building is the key first step in deciding the correct approach to any alterations or upgrading. Where historic fenestration survives, HE explains that it is often an irreplaceable resource that should be conserved and repaired wherever possible. It describes how to determine the architectural and historic significance of windows so that decisions about altering them can be made in an informed way.

- 5.2.3 At page 6 of this guidance it states:

"The pressures that threaten traditional windows come from many different sources. Probably the most significant of these is the replacement window industry that relies on PVC-u windows for almost all of its business. The industry has invested heavily in marketing over a long period and as a result has persuaded many home_owners that their old timber windows are rotten, draughty, and beyond economic repair, whereas in most cases minor repairs and some upgrading would have allowed them to remain fit for purpose and serviceable for years to come.

Replacement plastic (PVC-u) windows pose one the greatest threats to the heritage value of historic areas, particularly in towns and villages. Despite attempts at improving the design of these windows they are instantly recognisable because they cannot match the sections and proportions of historic joinery....."

- 5.2.4 At page 54 of this guidance it states:

"If used in multi-paned windows, IGUs will generally be less efficient than secondary glazing since even the most efficient units will not overcome thermal bridging through the frame and glazing bars...."

- 5.2.5 Further on, Historic England's general approach to the alteration or replacement of windows is set out below:

1. Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

2. Where historic windows have already been replaced with windows whose design follows historic patterns, these usually make a positive contribution to the significance of listed buildings.

When they do, They should therefore be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

3. Where historic windows or replacement windows of historic pattern survive without historic

glass it may be possible to introduce slim-profile double-glazing without harming the significance of the listed building. There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame to accommodate thicker glazing, thereby harming significance. These issues are covered in Section 4 of this guidance.

4. Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double-glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.

5. Where a new window or re-glazing is agreed, the reflective properties of secondary and double-glazing as compared to modern, polished single-glazing, do not usually harm the significance of the building. But when new multi-paned windows are proposed, the desirability of reproducing broken reflections by individually glazing each pane should be considered. Where the aesthetic value of the building is high, then the impact on the whole of the relevant elevation should be considered, including the desirability of accurately matching other windows.

Guidance on Alterations to Listed Buildings

IHBC Toolbox Guidance Note GN2021/1 - January 2021

5.2.6 At 4.3.4 it states:

“Proposals to double-glaze existing windows are often inappropriate as well as having a surprisingly high carbon impact and a short lifespan. Thicker glazing units require glazing bars to be modified to accommodate them and the window will then have a very different appearance.”

Whilst at 4.3.5 it states:

“Applied glazing bars to the surface of windows or sandwiched between panes of double-glazing are generally inappropriate. Secondary glazing may be acceptable subject to careful location of the framing elements so as not to be disruptive to the visual appearance when seen from the exterior.”

5.3 Key Issues

5.3.1 The key issues are to consider the impact of the placement windows upon the listed building's special character and on the character and appearance of the Letchworth Conservation Area.

5.3.2 The existing windows are non-original but are manufactured in timber. Originally the windows would have had a combination of full height windows with a transom bar and top-hung windows with a similar width split transom below.

5.3.3 An inventory of windows for this range of listed buildings was compiled in June 1999 but unfortunately a copy of this inventory cannot be found. Furthermore, it is understood that a 'moratorium amnesty' on unauthorised replacement windows on listed properties at Ridge Road before 1st October 2005 was imposed at that time.

5.3.4 There have been multiple applications over the years for replacement windows at this grade II listed group. Although listed building consent has been granted for replacement Upvc windows at the following:

□ no.38 - 94/00611/LB

- ☐ no.88 - 83/01356/1LB
- ☐ no.108 - 90/00045/1LB

there have also been six occasions where listed building consent has been refused for replacement Upvc windows at Ridge Road:

- ☐ no.36 - 20/02900/LBC
- ☐ no.52 - 91/00232/1LB
- ☐ no.56 - 91/00232/1LB
- ☐ no.74 - 98/01675/1LB
- ☐ no.82 - 01/00026/1LB
- ☐ no.88 - 16/00645/1LB
- ☐ no.104 - 25/00469/LBC

Consequently, since the application at no.38 was determined in 1994, no Upvc windows have been granted consent in this listed group.

5.3.5 Relatively recently, NHDC refused two applications seeking a Certificate of Lawfulness of Proposed Works to a Listed Building in relation to the installation of Rehau Rio Flush windows at 8 Westholm and 114 Ridge Road. This was on the basis that replacement Upvc windows would affect the building's special character and therefore will require listed building consent which, if an application were to be submitted, is unlikely to be forthcoming.

5.3.6 Application ref: 25/00469/LBC sought listed building consent for replacement Upvc framed windows and was refused for the following reason:

Nos. 2-122 (evens) Ridge Road are grade II listed and form a pioneer estate designed by B Parker and R Unwin in 1906 for the Garden City Tenants Limited. The estate comprises 13 grouped terraces forming a cul-de-sac and village green layout. These properties are located within the Letchworth Conservation Area. By reason of changing the frame material from timber to Upvc, the glazing system incorporating 28mm double-glazing and together with the lack of construction framing details including the split transom and single transom sections indicating that these can be readily manufactured as part of the Mechanical Joint Flush Sash Eurocell Modus system to replicate the original window design found elsewhere on the Birds Hill Estate, the replacement windows would harm the listed building's special character. The replacement windows will fail to satisfy the provisions of Sections 16(2) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the aims of Section 16 of the NPPF and the aims of Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

5.3.7 The current application also seeks consent for Upvc windows but this time using an alternative manufacturer (Residence R9). Considering the reason for refusal above, it is perplexing to read the following in the submitted Design Statement:

Taking into account feedback from our previous application, we propose the replacement of the front elevation expired double glazed wooden windows with Residence R9 windows.

5.3.8 According to the manufacturer's brochure, the Residence R9 window system is:

"....engineered to meet current and anticipated future standards. Other window frames are typically 3 or 5 chambers and are usually 70mm wide, Residence 9 is made to CEN A Wall thickness and has 9 chambers and is 100mm wide, resulting in superior thermal, acoustic, strength and security performances."

The same brochure goes on to say:

Achieving one of the highest classifications on the British Standard weather test due to its robust design, R9 has market leading thermal and acoustic values. It achieves a certified window energy A++ WER rating and accommodates the most thermally and acoustically efficient 44mm triple glazing and 28mm double glazing, attaining U-values of 0.74 W/m²k with triple glazing, PassivHaus Standard and 1.2 with double glazing, far surpassing the British Building Regulation requirements. All of this contributes to lower energy bills, keeping you cosy in the winter and cool in the summer.

- 5.3.9 The Residence R9 window type together with the Rehau Rio Flush and the Mechanical Joint Flush Sash Eurocell Modus type in the previous application are window types that may be considered generally acceptable in Article 4 areas and on non-listed buildings in conservation areas. However, these window types would nevertheless, result in the use of a Upvc frame system which is considered an inappropriate and incongruous, modern frame system for listed buildings.
- 5.3.10 The frame profiles for the Residence R9 are considered no substitute for authentic timber window frame joinery and the 28mm double-glazing system would emphasise the fact that this is a modern substitute system and falls short of the standard of window framing/glazing bar details necessary to safeguard the building's special character. There are no metric scale drawings of the proposed windows with the application for instance indicating section details (including transom bar width and whether glazing bars are a 'through' type or applied) or indicating method of opening. What information is known about this window system is gleaned from the manufacturer's brochure. The application was made valid on the basis that all new windows are proposed to be manufactured in Upvc, and the elevation drawing was previously considered acceptable for appn ref: 25/00469/LBC.
- 5.3.11 The HE guidance below describes that assessing the significance of a window and understanding the contribution it makes to the significance I am also unconvinced that the split transom and ordinary transom can be manufactured to the same width as found on original windows within this listed building group. It follows that the replacement of the timber windows with a plastic alternative, even those of the type proposed, would have a small but nonetheless significant and harmfully erosive effect on the appearance and historic character of the heritage asset.

5.4 **Alternative Options**

- 5.4.1 Nonapplicable.

5.5 **Pre-Commencement Conditions**

- 5.5.1 Nonapplicable.

5.6 **Conclusion**

- 5.6.1 On the basis that Upvc framing poses one of the greatest threats to the heritage value of historic buildings and areas and is not supported on listed buildings as a matter of principle within the North Herts area, this application cannot be supported.
- 5.6.2 It is considered that the proposal will occasion harm to the listed building's special character. The proposal would not satisfy the provisions of Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the aims of Section 16 of the NPPF and the aims of Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

6.0 **Recommendation**

6.1 I recommend that listed building consent be **REFUSED** for the following reason:

1. Reason for Refusal

Nos. 2-122 (evens) Ridge Road are grade II listed and form a pioneer estate designed by B Parker and R Unwin in 1906 for the Garden City Tenants Limited. The estate comprises 13 grouped terraces forming a cul-de-sac and village green layout. These properties are located within the Letchworth Conservation Area. By reason of changing the frame material from timber to Upvc, the glazing system incorporating 28mm double-glazing and together with the lack of construction framing details including the split transom and single transom sections indicating that these can be readily manufactured as part of the Residence R9 system to replicate the original window design found elsewhere on the Birds Hill Estate, the replacement windows would harm the listed building's special character. The replacement windows will fail to satisfy the provisions of Sections 16(2) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the aims of Section 16 of the NPPF and the aims of Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

Signed  Shaun Greaves Determining Officer Date: 30 March 2026	Development Management North Hertfordshire District Council Council Offices Gernon Road Letchworth Herts SG6 3JF