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**F/YR22/0464/LB**

**Applicant: Mr Clive Lemmon  
March Civic Trust**

**Agent : Mr R Papworth  
Morton & Hall Consulting Ltd**

**March Town Hall, Market Place, March, Cambridgeshire PE15 9JF**

**Works to a Listed Building comprising the replacement of front access door**

**Officer recommendation: Refuse**

**Reason for Committee: Referred by Head of Planning on advice of Committee Vice Chairman**

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## **1 EXECUTIVE SUMMARY**

- 1.1 This application seeks listed building consent for the removal of the existing front main external entrance doors and their replacement with new hardwood external grade entrance doors at March Town Hall.
- 1.2 Insufficient justification has been provided as to why the wholesale replacement of the access doors at March Town Hall is necessary, nor have any public benefits been articulated. A repair approach could potentially be taken which would not result in the wholesale loss of historic fabric. Like for like repairs can be undertaken without consent and as such represents a more sustainable approach overall.
- 1.3 Given the lack of sufficient information provided, and as per Paragraph 199 of the NPPF, great weight should be given to the asset's conservation. To approve the application in its current form would be in contravention of the NPPF and Policy LP16 and LP18 of the Fenland Local Plan 2014.
- 1.4 Given the clear conflict with the relevant policies, it is considered that to grant the applications would be indicative of a failure of the Council to fulfil its duties under Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 1.5 Consequently, the recommendation is to refuse both applications.

## **2 SITE DESCRIPTION**

- 2.1 March Town Hall is a landmark building on the market place, built in 1900 as a civic building. The use of the premises has evolved over time; although it retains its community use.
- 2.2 The building is located within March Conservation Area and since February 1985 has been a Grade II Listed Building.

### 3 PROPOSAL

- 3.1 This application seeks listed building consent for the removal of the existing front main external entrance doors and their replacement with new hardwood external grade entrance doors which are proposed to be lockable within the existing structural openings.
- 3.2 Full plans and associated documents for this application can be found at:

[F/YR22/0464/LB | Works to a Listed Building comprising the replacement of front access door | March Town Hall Market Place March Cambridgeshire PE15 9JF \(fenland.gov.uk\)](#)

### 4 SITE PLANNING HISTORY

Reference	Description	Decision
F/YR20/0941/LB	Works to a Listed Building comprising the replacement of 8 x windows to North elevation and 4 x windows to West elevation with double glazed timber units	Granted 06/11/2020
F/YR18/1086/LB	Works to a Listed Building comprising of replacement casements to 15no first-floor (windows 1-15) and repairs to casements to 7no ground floor windows (windows 16-22) on north, south and east elevations including 5no windows with secondary glazing	Granted 07/02/2019
F/YR18/0369/LB	Works to a Listed Building comprising of repairs to 15no first-floor and 7no ground floor windows on north, south and east elevations	Withdrawn
F/YR03/0389/LB	Internal and external alterations and extensions	Granted 18/11/2003
F/YR03/0388/F	Change of Use to multi-purpose community facilities and offices including internal and external alterations and extensions	Granted 18/11/2003
F/YR01/0739/LB	Installation of burglar alarm system	Granted 17/09/2001
F/94/0416/LB	Erection of an external commemorative bell and stone plaque	Granted 21/10/1994
F/92/0907/LB	Internal alterations to ground-floor offices and provision of an external	Granted 04/06/1993

	ramp	
F/0799/81	Change of use of part ground floor from Magister's Court to offices Town Hall Market Place March	Deemed Consent CCC 16/02/1982

## 5 CONSULTATIONS

### 5.1 FDC Conservation Officer (20/06/2022)

*An application has been received with regards to replace the existing front doors on a like-for-like basis.*

*Unfortunately, the heritage statement submitted with the application does not articulate why this is necessary. The existing doors appear to match exactly those which are indicated on an original plan for the building, a copy of which has been/is on display in the Town Hall..... In the light of any evidence to the contrary therefore, it must be assumed that the existing doors represent surviving, original fabric.*

*Good conservation practice recommends that wherever possible, maintenance and repair is prioritised over wholesale replacement. It is more sustainable, both to the environment, and to the significance of a listed building.*

*The heritage statement submitted provides no information as to the necessity of replacing these doors, and so I find it difficult to be able to form a balanced decision.*

*Paragraph 194 of the NPPF states that the level of details provided by an applicant should be 'sufficient to understand the potential impact of the proposal on their [the asset's] significance, and paragraph 202 states that where there is less than substantial harm, the harm should be weighed against public benefit. Furthermore, paragraph 199 states that 'great weight should be given to the asset's conservation'.*

*The application therefore appears to propose the wholesale loss of a pair of original doors, without sufficient explanation as to the reasons why this may be necessary. This therefore does not fulfil the requirements of paragraph 194 of the NPPF. No public benefit has been put forward to justify the change (which therefore does not fulfil the requirement of para 202). The heritage statement does say that the proposed entrance doors 'will be lockable', but it is presumed (without information to the contrary), that the current doors are also lockable. It is not clear therefore, if this is the reason behind the application. I am therefore, in a position, without further information, of following guidance in para 199 to 'give great weight to the asset's conservation'.*

Clarifications were sought from the agent and the following comments subsequently provided.

### 5.2 FDC Conservation (30/08/2022)

*My response to this application remains largely the same.*

*The agent states that the doors appear to have had previous spliced repairs, but does not indicate why this continued approach is no longer suitable. It may be that the repairs are no longer holding, in which case the same approach can be taken, chasing back to sound wood and making further repairs. The threshold/weather moulding at the base of the door is 'showing wear and tear', but it is not clear to what degree. This could simply mean that it needs a new coat of paint. If more works are required, this element of the door could be replaced as a like-for-like repair.*

*If there is 'considerable draft', then draft proofing measures can be taken, and if the doors are becoming difficult to lock, it is to be presumed that a repair approach would also be feasible for this element of the doors.*

*It remains that there is not clear or sufficient justification for wholesale replacement of the door, when a repair approach seems to be equally feasible.*

*This approach remains consistent with advice given to other owners of listed buildings and other similar applications across the district.*

*If replacement is insisted upon, listed building consent will be necessary, subject to the condition of the doors being beyond all feasible repair and subject to joinery conditions (usual scale drawings indicating a like-for-like replacement in terms of profile etc).*

*However, like for like repair can be undertaken without consent and should be a cheaper and more sustainable approach over all.*

*Therefore, I feel the additional statement provided by the agent does not provide the level of information required to justify a wholesale replacement of these doors, when a repair approach is the appropriate way forward.*

*I cannot support an approval based on the information submitted.*

### **5.3 The March Society**

*Thank you for inviting The March Society to comment.*

*We have no objection to this application except to ask that consideration can be given to the locking system to ensure the security of the building.*

### **5.4 Cambridgeshire Constabulary**

*Thank you for the opportunity to comment on this planning application, I have viewed the documents including the heritage statement in relation to crime, disorder and the fear of crime. I have searched the constabulary crime and incident systems covering this location for the last 2 years. I would consider this to be an area of low risk to the vulnerability from crime at present.*

*Taking into consideration with what is allowed for listed buildings, perhaps consideration can be given to the security of the locking system, BS 3621 locks with additional deadlock (locking system) and security enhanced hinges, to ensure the door is as secure as possible and allowing the most appropriate security for the building.*

*I have no further comments at this time.*

## 5.5 Local Residents/Interested Parties

No comments received.

## 6 STATUTORY DUTY

- 6.1 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities when considering development to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 6.2 Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities in considering whether to grant listed building consent for any works to 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.

## 7 POLICY FRAMEWORK

### 7.1 National Planning Policy Framework (NPPF)

Para 2 – Applications to be determined in accordance with the development plan

Para 10 – A presumption in favour of sustainable development

Para 194 – Need to describe the significance of the heritage assets

Para 197 – LPA should consider sustaining and enhancing heritage assets and putting them to viable uses

Para 199 – Weight should be given to the significance of the heritage asset, the more important the asset the greater the weight

Para 202 – Substantial harm should be weighed against the public benefits of the proposal

### 7.2 National Planning Practice Guidance (NPPG)

Determining a Planning Application

### 7.3 National Design Guide 2021

Context

Identity

### 7.4 Fenland Local Plan 2014

LP6 – Employment, Tourism, Community Facilities and Retail

LP14 – Responding to Climate Change and Managing the Risk of Flooding in Fenland

LP16 – Delivering and Protecting High Quality Environments across the District

LP18 – The Historic Environment

### 7.5 Emerging Local Plan

The Draft Fenland Local Plan (2022) was published for consultation on 25th August 2022, the first stage of the statutory process leading towards the adoption of the Plan. Given the very early stage which the Plan is therefore at, it is considered, in accordance with Paragraph 48 of the NPPF, that the policies of this should carry extremely limited weight in decision making. Of relevance to this application are policies:

LP7 – Design

LP23 – Historic Environment

## 7.6 **March Neighbourhood Plan 2017**

There are no specific policies relating to developments such as this, however the visions, aims and objectives of the Plan is that the quality of the built and natural environment is improved along with the level of provision and quality of recreational land facilities.

## 8 **KEY ISSUES**

- **Principle of Development**
- **Heritage Impacts**

## 9 **ASSESSMENT**

### **Principle of Development**

- 9.1 Policy LP16 and LP18 of the Fenland Local Plan seek to protect and enhance heritage assets. The principle of development is therefore supported subject to the significance and the likely impacts on the heritage asset.

### **Heritage Impacts**

- 9.2 This application includes the removal of the existing front main external entrance doors and their replacement with new hardwood external grade entrance doors which are proposed to be lockable within the existing structural openings.
- 9.3 March Town Hall is a Grade II Listed Building and has been listed since February 1985. The site is a landmark building on the market place within March Conservation Area.
- 9.4 Under the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a legal duty to have special regard to the desirability or preserving a listed building, or any of its features, when considering whether to grant Listed Building Consent.
- 9.5 Policies LP16 and LP18 of the Fenland Local Plan 2014 seek to protect and enhance heritage assets. Chapter 16 of the NPPF 2021, C1, C2 and I1 of the NDG 2021 are also relevant.
- 9.6 Paragraph 194 of the NPPF states that applicants are required to describe the significance of the heritage assets affected. The level of detail should be proportionate to the assets' importance to understand the potential impact of the proposal on the assets' significance.
- 9.7 Paragraph 199 of the NPPF states that great weight should be given to the assets' conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to the assets' significance.
- 9.8 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 9.9 Further to consultations with Fenland District Council's Conservation Officer with regard to the impact of the proposal on the heritage of the building and the surrounding conservation area, it was considered that the proposal in its current

form is unacceptable. The heritage statement submitted with the application does not articulate why the wholesale replacement of the doors is necessary.

- 9.10 The wholesale loss of the original doors, without sufficient explanation as to why this loss may be necessary, the proposal does not accord with paragraph 194 of the NPPF as the application does not include a sufficient level of detail to understand the need and the potential impact of the proposal on the assets' significance.
- 9.11 In addition to the above, no public benefits were put forward as part of the original submission to justify the loss of the original doors and the consequent harm to the asset. The application therefore does not accord with paragraph 202 of the NPPF.
- 9.12 Given the lack of detail provided as part of the original submission, clarifications were sought from the agent and it was confirmed that the main arch around the door is to be maintained and repainted; the existing doors appear to have had sections of timber spliced into them; there is considerable draught through/around the doors; the doors are becoming difficult to lock; the threshold/weather moulding at the base of the door is showing wear and tear. It was also confirmed that the proposal would be new hardwood doors to match the existing size and look painted black.
- 9.13 Following the submission of these further details, further comments were provided by the FDC Conservation. The comments reiterated that there is no clear or sufficient justification for the wholesale replacement of the doors. The agent confirmed that the doors have had previous spliced repairs, however they did not indicate why this continued approach is no longer suitable. It is therefore considered that a repair approach could be taken.
- 9.14 The agent also confirmed that the threshold/weather moulding at the base of the door is showing wear and tear, however it is not clear to what degree. This could simply mean that the threshold/weather moulding needs a new coat of paint. However, if more works are required, this element of the door could be replaced as like-for-like repair.
- 9.15 The agent also confirmed that there is considerable draft through/around the doors. Draft proofing measures can be undertaken as detailed in the detailed comments from the FDC Conservation Officer in section 5.2 above.
- 9.16 Given that a repair approach seems to be equally feasible and without clear or sufficient justification as to why the wholesale replacement of the original doors are necessary, the application as it stands is considered to be contrary to Policy LP16, LP18 and the NPPF.
- 9.17 Like for like repairs can be undertaken without listed building consent and represent a more sustainable approach overall.

## **10 CONCLUSIONS**

- 10.1 This application does not provide sufficient justification for the wholesale replacement of the original doors at March Town Hall. No public benefits have been put forward to justify the replacement.
- 10.2 Given the lack of sufficient information, as per paragraph 199 of the NPPF, great weight should be given to the assets' conservation. This application is therefore

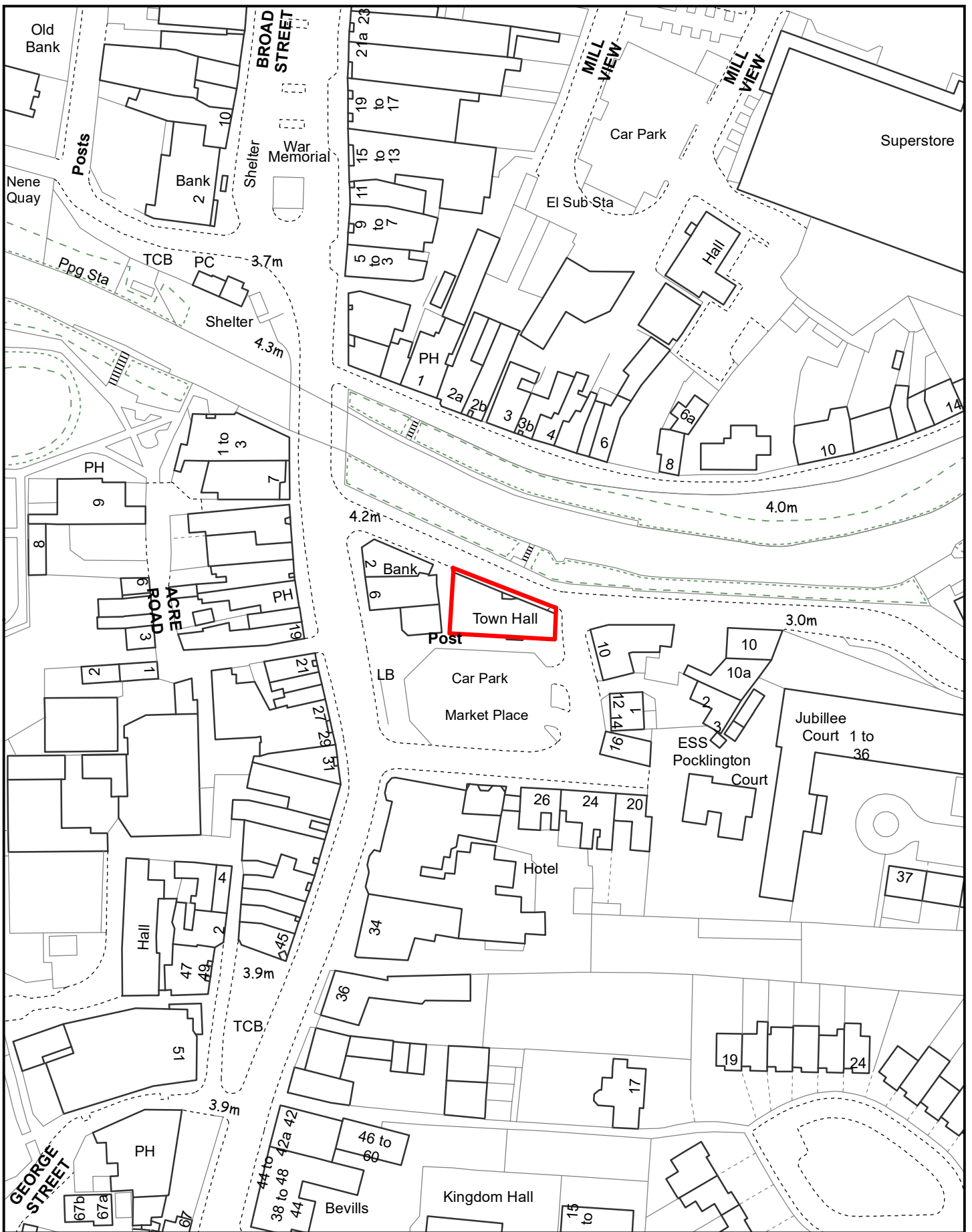
considered to be contrary to Policy LP16 and LP18 of the Fenland Local Plan 2014 and the NPPF 2021.

## 11 RECOMMENDATION

### 11.1 Refuse; for the following reasons:

1	<p>Policies LP16 and LP18 of the Fenland Local Plan requires that development proposals describe and assess the significance of any heritage asset, identify the impact of proposed works on its character and provide justification for those works, including harm to the setting of the asset. Furthermore, paragraph 194 of the NPPF also states that applicants should describe the significance of any heritage assets affected. Paragraph 199 of the NPPF states that 'great weight should be given to the asset's conservation' and Paragraph 200 of the NPPF requires that applications should have clear and convincing justification for harm to heritage assets. In addition, Paragraph 202 requires harm to heritage assets to be weighed against public benefit.</p> <p>The application provides insufficient justification for the works proposed, which would result in the total loss of original, surviving fabric of the building. These works would cause less than substantial harm to the significance of the listed building with no public benefits having been identified. The application is therefore contrary to the aforementioned polices.</p>
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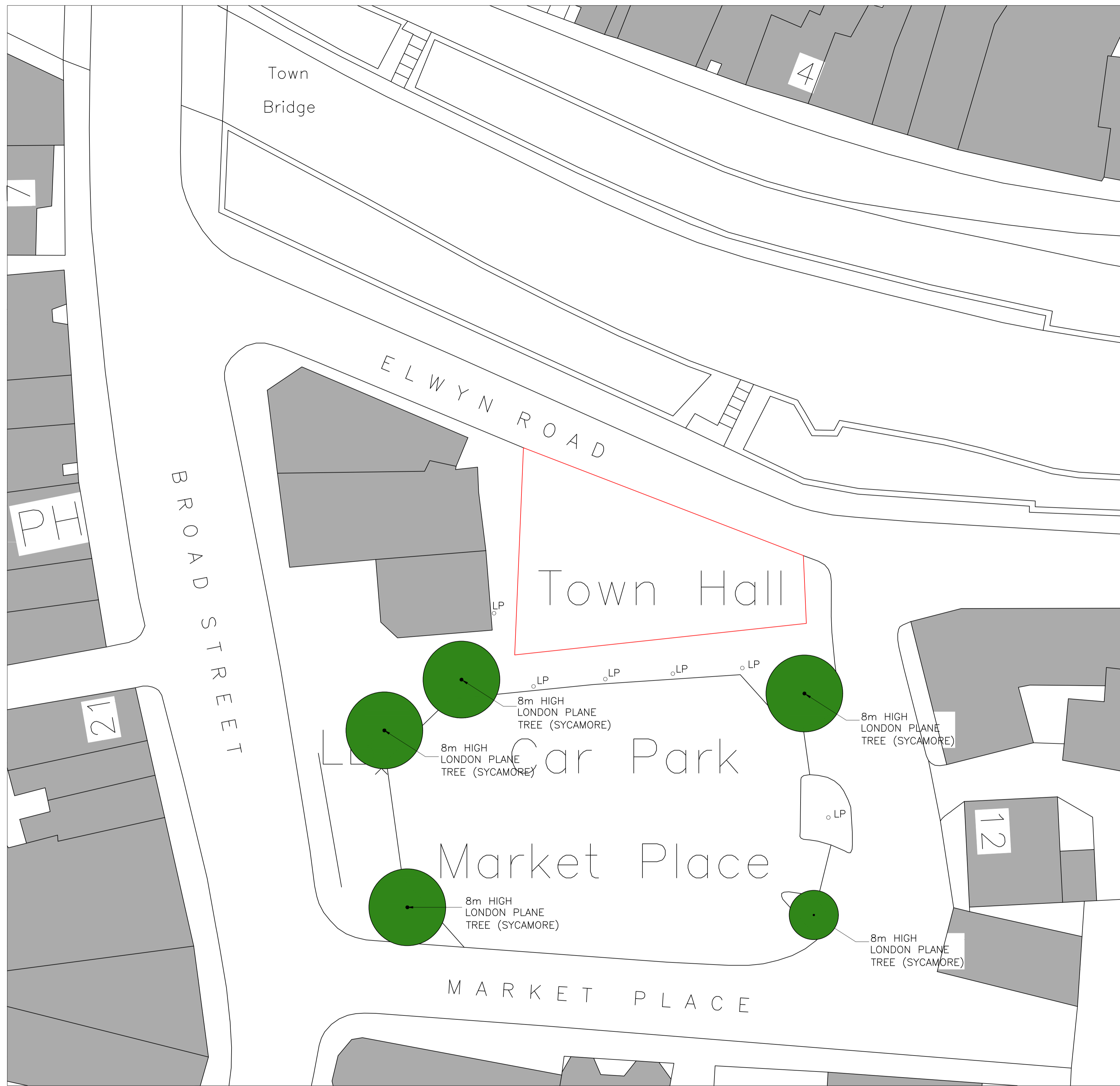
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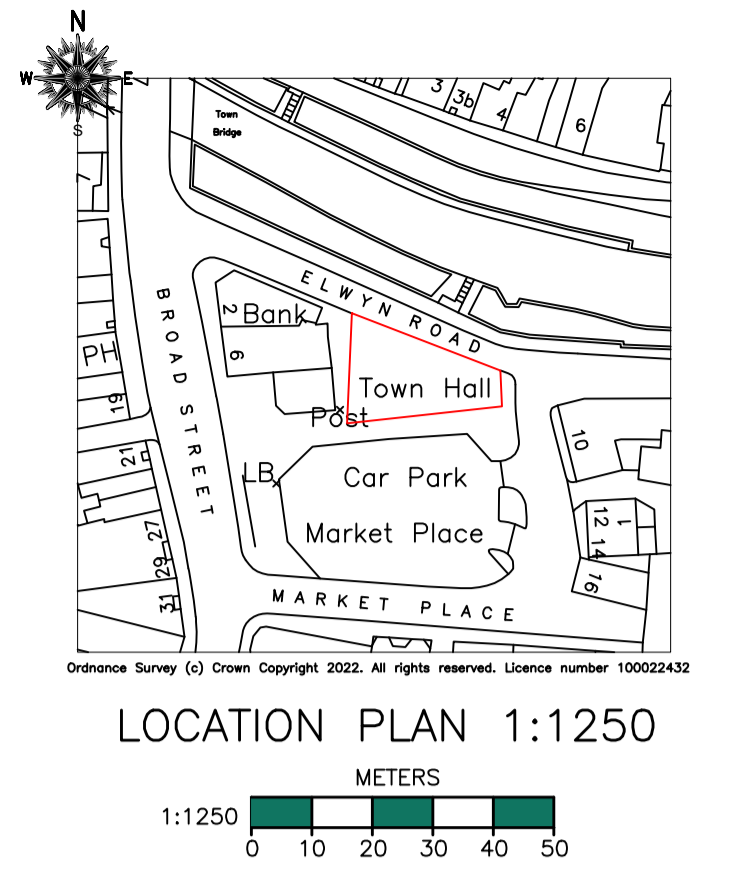
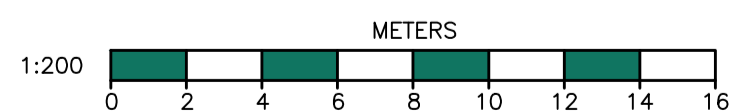
**F/YR22/0464/LB**

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EXISTING / PROPOSED SITE PLAN 1:200



LOCATION PLAN 1:1250  
METERS  
0 10 20 30 40 50

**LEGEND**

- CONCRETE SLABS (NON SLIP)
- PERMEABLE BLOCK PAVING (NON SLIP)
- WASTE BINS
- GRASS
- VEGETATION
- GRAVEL
- PROPOSED HEDGING

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All products and materials to be handled, stored, prepared and used or fixed in accordance with the manufacturers current recommendations.  
The contractor is to arrange inspections of the works by the BCO (or NHBC) as required by the Building Regulations and is to obtain completion certificate and forward to the Engineer.  
All finishes, insulation and damp-proofing to architect's details

REVISIONS	DATE

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**Penland District Council**  
LIFE BUILDING EXCELLENCE AWARDS  
**winner**

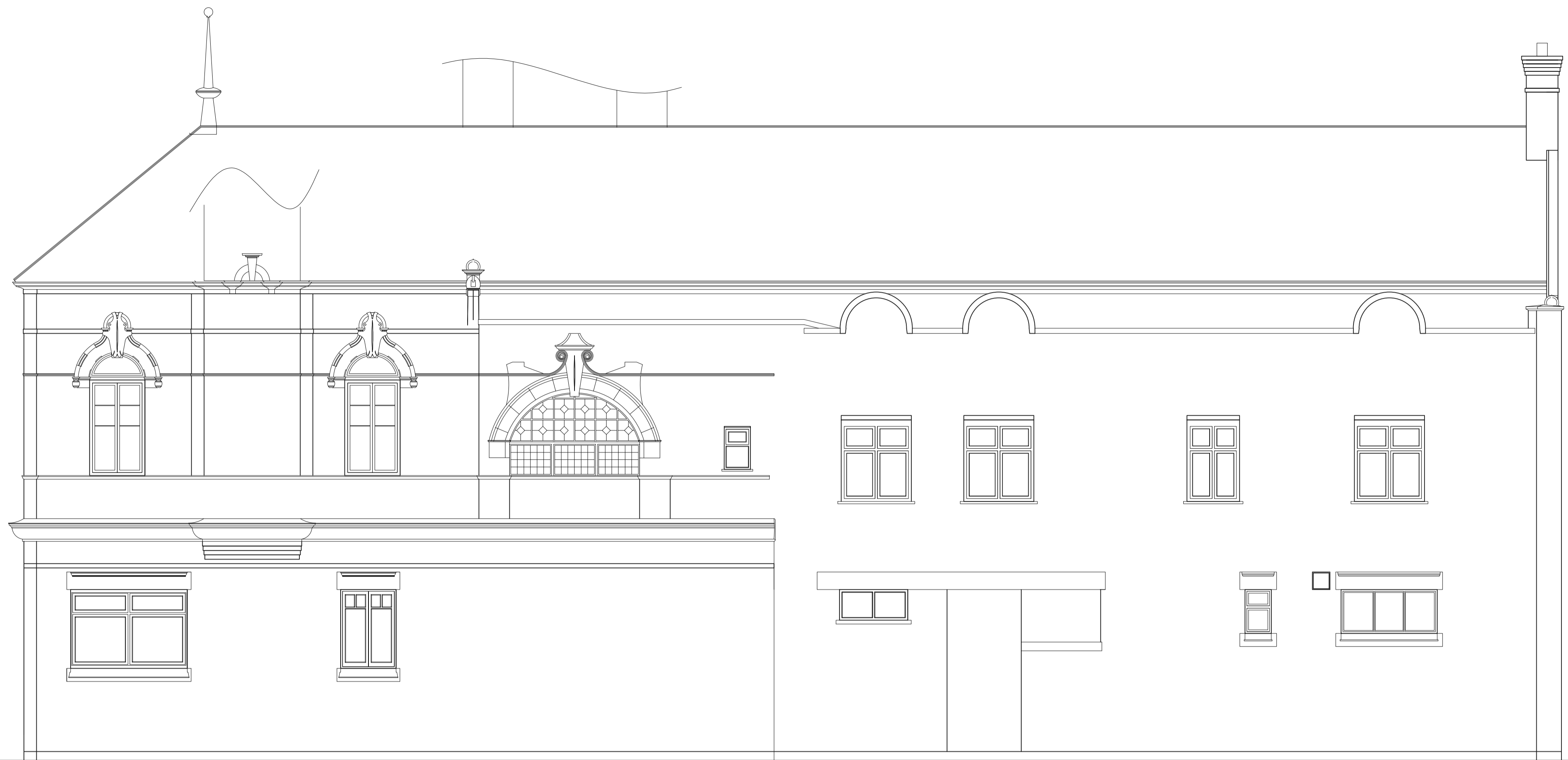
**Building Design Awards**  
Building Excellence in Fenland

CLIENT  
March Civic Trust

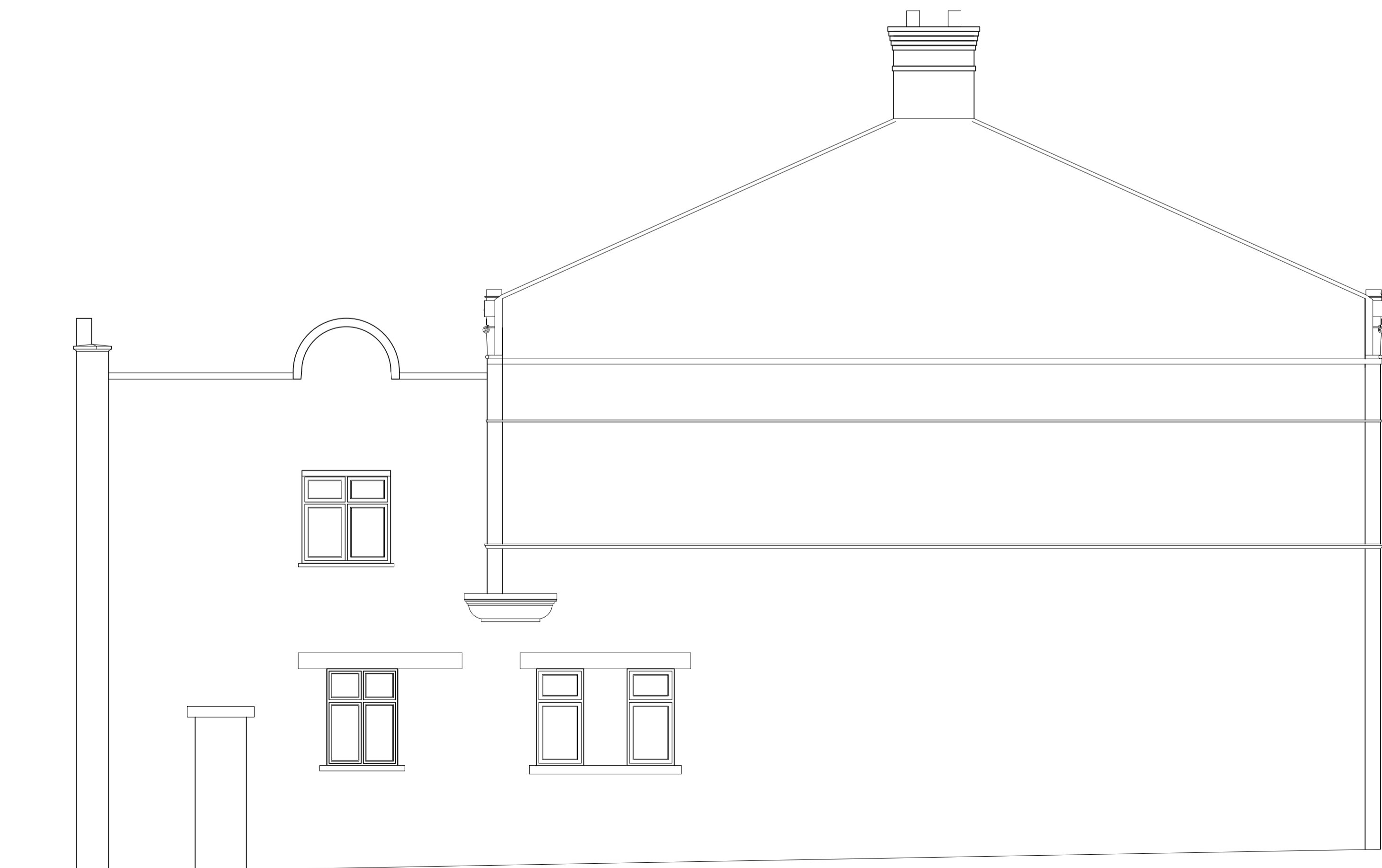
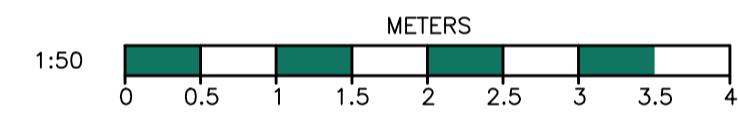
PROJECT  
March Town Hall  
Market Place, March  
PE15 9JF

TITLE  
Existing Site Plan &  
Location Plan

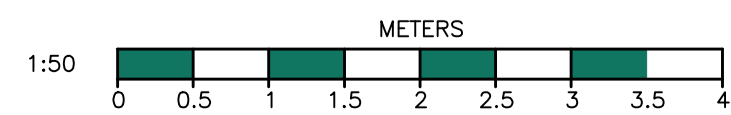
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DATE Aug 2020	DRAWING NUMBER
SCALE As Shown	H5948/03



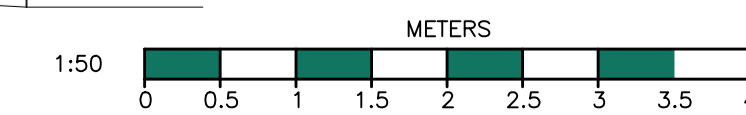
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(1:50) (NO CHANGE)



EXISTING WEST FACING ELEVATION  
(1:50) (NO CHANGE)



EXISTING EAST FACING ELEVATION  
(1:50) (NO CHANGE)



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All products and materials to be handled, stored, prepared and used or fixed in accordance with the manufacturers current recommendations.

The contractor is to arrange inspections of the works by the BCO (or NHBC) as required by the Building Regulations and is to obtain completion certificate and forward to the Engineer

All finishes, insulation and damp-proofing to architect's details

REVISIONS	DATE

**MORTON & HALL**  
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March Civic Trust

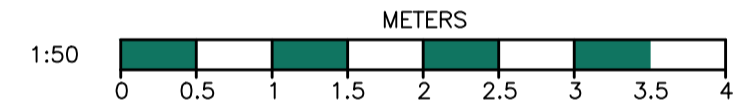
PROJECT  
March Town Hall  
Market Place, March  
PE15 9JF

TITLE  
Existing Elevations  
(East, West & North)

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DATE Aug 2020	DRAWING NUMBER H5948/02
SCALE As Shown	



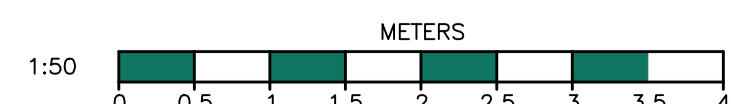
EXISTING SOUTH FACING ELEVATION(1:50)



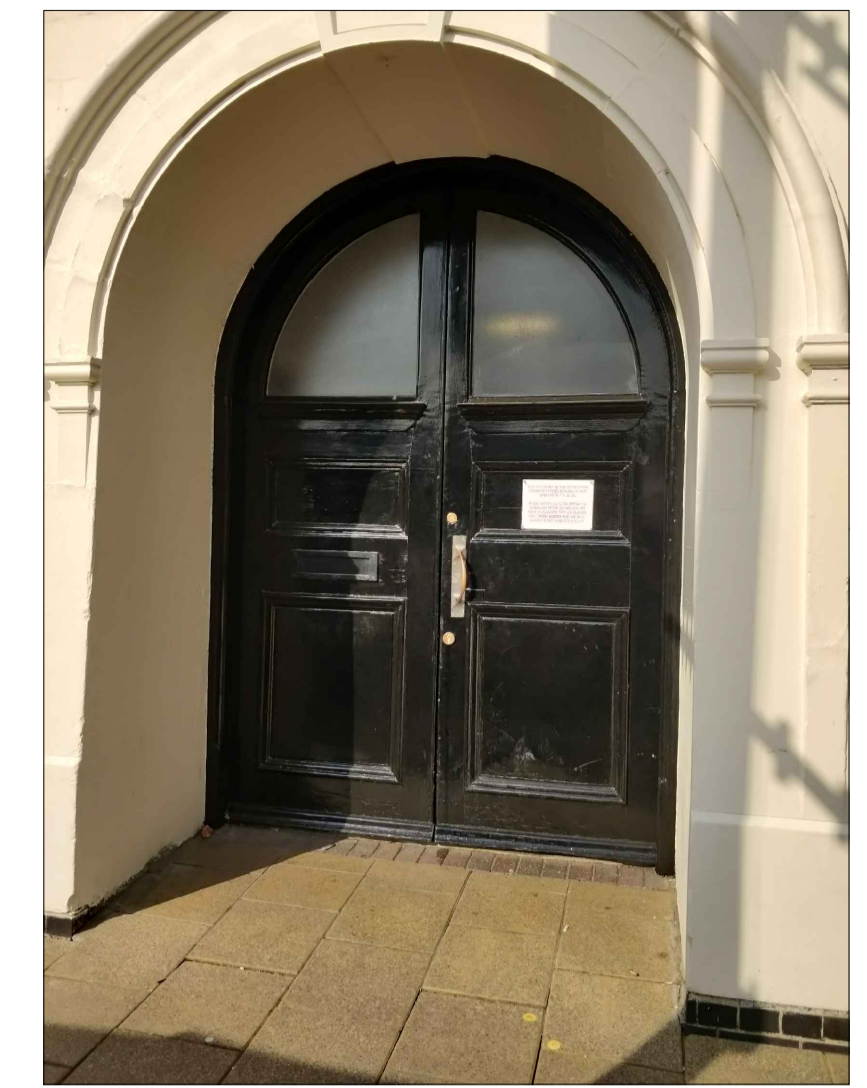
EXISTING DOORS TO BE REMOVED AND REPLACED WITH HARDWOOD FEATURES



PROPOSED SOUTH FACING ELEVATION (1:50)



SET NEW HARDWOOD DOORS, PAINTED BLACK WITH EXISTING STRUCTURAL OPENING



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 All finishes, insulation and damp-proofing to architect's details

A	FRONT ACCESS DOOR	MAR 2022
	REVISIONS	DATE

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LABC  
 LEADS BUILDING EXCELLENCE AWARDS  
 winner

Fenland District Council  
 Building Design Awards  
 Building Excellence in Fenland

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 March Civic Trust

PROJECT  
 March Town Hall  
 Market Place, March  
 PE15 9JF

TITLE  
 Existing & Proposed  
 Elevation (South Facade)

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CHECKED			
DATE	Aug 2020	DRAWING NUMBER	
SCALE	As Shown		H5948/01A