

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

**Agent : Morton & Hall Consulting
Ltd**

March Town Hall, Market Place, March, Cambridgeshire

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

Reason for Committee: It is the view of the Head of Planning that there are wider issues to consider in respect of this proposal.

1 EXECUTIVE SUMMARY

This submission seeks Listed Building consent for the repair and replacement windows at March Town Hall, which is a Grade II Listed Building.

Officers have no concerns with the proposal in respect of the following elements of the scheme:

- The replacement of 15 first floor windows with like-for-like soft wood timber windows**
- The repair of 7 ground floor windows**
- The replacement of 5 internal secondary glazing units at ground floor**

Officers do have concerns in respect of the proposed use of double glazed at first floor level.

Whilst the principle of replacement windows per se within the building can be accepted proposals to include double glazing to the first floor windows are contrary to national and local planning policy and do not accord with published guidance .

The materials used in the fabric of a building are considered significant as they contribute to the heritage value of the building overall, and the use of non-traditional materials is to be avoided. This is from the perspective of both the building fabric and the aesthetic when viewed from inside the building.

It is considered that the reasons given for wanting to have double glazed units is insufficient to outweigh the impact that this would have on the qualities of the building - in terms of the building fabric as a building of this era would not have had double glazing; nor does it accord with published guidance which is informed by similar scenarios, case studies and research. There is also policy requirement to demonstrate public benefit to compensate for harm; however this has not been satisfactorily proven.

Due regard has been given to the justification put forward by the applicants, however in the main this justification is considered subjective and anecdotal. In addition alternative measures that would be less harmful to the building to secure positive enhancements in terms of draught and noise reduction have been put to the applicants. However these have not been considered acceptable by the applicant.

This case has clear implications for planning policy with regard to the District's Heritage assets; historically double-glazing has only been countenanced when there have been aesthetic benefits, e.g visually enhancing previously inappropriate windows, to be derived from proposals and no such benefits accrue in this instance and as such there can be no alternative but to recommend refusal.

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 it has been a Grade II listed building.

3 PROPOSAL

- 3.1 This application seeks listed building consent for the replacement of 15 windows to the first floor with engineered softwood double glazed units. It is also proposed that 7 ground floor windows will be maintained and repaired as necessary by employing the method of localised cutting out of timber sections and splicing in new timber and repainting over to match the existing. Five of the ground floor windows have internal secondary glazing and it is intended to replace this. In all cases the oak sub-frame is to be retained. In addition the semi-circular heads of the windows at first floor are not affected by the works.
- 3.2 Full plans and associated documents for this application can be found at:

<https://www.fenland.gov.uk/publicaccess/simpleSearchResults.do?action=firstPage>

4 SITE PLANNING HISTORY

F/YR18/0369/LB	Works to a Listed Building comprising of repairs to 15 no first-floor and 7no ground floor windows on north south and east elevations	Withdrawn 06/07/2018
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

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 ramp	Granted 06/04/1993
F/0799/81	Change of use of part ground floor from Magistrates Court to offices	Deemed Consent 16/02/1982

5 CONSULTATIONS

- 5.1 **Town Council:** Recommend approval.
- 5.2 **Senior Archaeologist (CCC):** We have reviewed the above referenced planning application and have no objections or requirements for this development.
- 5.3 **FDC Conservation Team:** Recommend refusal – see section 10.
- 5.4 **Local Residents/Interested Parties:** None 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)**
Paragraph 2: Applications must be determined in accordance with the development plan unless other material considerations indicate otherwise
Paragraph 10 - Presumption in favour of sustainable development.
Paragraph 189 – need to describe the significant of affected heritage assets
Paragraph 192 – LPA should consider sustaining and enhancing heritage assets (HA) and putting them to viable uses, the positive contribution HA can make to sustainability communities including economic viability
Paragraph 193 – weight should be given to the significance of the heritage asset, the more important the asset the greater the weight
Paragraph 194 – any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification
Paragraph 195 – where a development will lead to substantial harm [...], local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm [...] is necessary to achieve substantial public benefits that outweigh that harm [...].

7.2 National Planning Practice Guidance (NPPG)

7.3 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

7.4 Historic England Guidance

- Energy Efficiency and Historic Buildings (EEHB): Draught-proofing windows and doors published 29.04.2016
- Energy Efficiency and Historic Buildings: Secondary glazing for windows published 29.04.2016

8 KEY ISSUES

- **Background**
- **Principle of Development**
- **Why single glazing is appropriate and double glazing is not**
- **Circumstances where double glazing may be accepted**
- **Justification given**
- **Evaluation and consequences**

9 BACKGROUND

- 9.1 Records show that since 2015 the Town Council have been exploring opportunities to replace windows at the Town Hall, specifically the windows which serve the first floor multi-purpose function room. From the outset, and consistently, officers have advised that any replacement of windows should be on a like-for-like basis and that the use of double glazing could not be favourably recommended.
- 9.2 It is accepted that the windows at first floor are likely to be 1970s replacements, noting that they have modern window furniture and limited coats of paint. There is also anecdotal evidence that the windows were replaced in the 1970s. Notwithstanding this it is clear from historic photographic evidence that the windows were replaced on a like-for-like basis and remained of the same design and appearance as the original windows.
- 9.3 In June this year an application was received to repair and replace the windows, but was later withdrawn, due to discrepancies between the proposal description and the information submitted (F/YR18/0369/LB). However, Conservation Officer comments provided at the time gave a strong message that from a conservation perspective the use of double glazing could not be supported in this listed building. Advice was given regarding the use of alternative single glazing products and secondary glazing. It was anticipated that the applicant having withdrawn the application would engage further with the Conservation team to develop a proposal that could achieve support; regrettably the applicant or their representatives did not avail themselves of this opportunity and the current application was submitted without further discussion.

10 ASSESSMENT

Principle of Development

- 10.1 Policy LP18 of the FLP gives a clear message that the Council will protect, conserve and seek opportunities to enhance the historic environment; requiring all development which would affect the significance of an asset and/or its setting to determine its architectural and historic interest and provide a clear justification for the works. This stance is strengthened in paras. 194-196 which highlights that any harm to a heritage asset should require clear and convincing justification, and should only be accepted where it is necessary to achieve substantial public benefits.

Argument against double glazing

- 10.2 A historic building's architectural and historic interest is in part derived from its period interest and the method and techniques expressed in the construction of its fabric. As such the use of double glazing arguably conflicts with a building's period interest. It is this conflict that represents 'harm' and accordingly renders the proposal non-compliant in terms of both local and national policy and at variance to recognised heritage guidance.
- 10.3 There is a general presumption that the original style windows within the building should remain as single glazed. It is clear that the windows are draughty with gaps between the joinery thus allowing cold air into the building and warm air out. Well fitted new windows would overcome a lot of the problems experienced with the current windows.
- 10.4 *Historic windows and doors make a major contribution to the significance and character of historic buildings and areas so every effort should be made to retain them rather than replace them. Windows and doors can tell us a lot about the history of a building, changing architectural taste and style, social hierarchy, building economics, craft skills and technical advances (Historic England: EEHB). The like-for-like replacements in the 1970s allow this information to still be read in the buildings fabric.*
- 10.5 *Older buildings are prone to heat loss through cracks and gaps which develop as various building elements move and distort over a long period. This is often the case for windows and doors which can be a major source of heat loss. However, less than a quarter of the heat lost through a typical traditional window escapes by conduction through the glass, the rest is by draughts (air infiltration). Since draughts make people feel colder, the occupants often turn up the heating and run it for longer. Windows and doors should be assessed for repairs before embarking on any draught-proofing measures. Traditional windows and doors can almost always be repaired, even if in very poor condition.*
- 10.6 *The replacement of existing windows with double glazed units can in many cases lead to a change in appearance, particularly the flatness of new glass and the need for thicker timber sections and glazing bars. [...] In historic buildings, there should be a strong preference for repair rather than replacement as the use of double glazing will often lead to a loss of significant historic fabric. Adding secondary glazing would often be the preferred option. (Historic England: EEHB)*

Where double glazing may be accepted

- 10.7 The use of double glazing in a historic listed building is accepted only in exceptional circumstances, i.e. only in circumstances where the historic fabric

and appearance does not remain and the revised scheme provides aesthetic benefit. For instance, if a building has had later replacement windows of an inappropriate style and/or design and the new scheme seeks to reinstate windows matching the original style windows it may be that double glazing could be accepted as a trade-off for the overall aesthetic improvement. This is not the case in this instance where the windows match the original in both style and material and therefore there is no improvement in the aesthetic of the building.

Justification provided

- 10.8 The application is accompanied with specifications for repair and the justifications for replacement and the introduction of double glazing. Whilst a repair methodology has been proposed for the ground floor windows, no such approach is being proposed towards the first floor windows, despite a lack of condition survey. The photographic survey provided shows each window, but fails to detail their overall condition.
- 10.9 A site visit by the Conservation Officer concluded on initial inspection, that a repair approach may well be applied to the first floor windows as well as the ground floor windows, where the bottom rails are rotten. The remainder of the windows appear to be largely in good condition.
- 10.10 The justification put forward for the use of double-glazing rests largely on a subjective view that the rooms may fall into disuse and decline due to the room being draughty and cold. There is no evidence that this in fact the case. It is considered that repaired and well maintained, or good quality replacement windows would go a significant way to mitigating the issues of cold and noise, without the need for double glazing. Whilst the thermal performance of a modern double glazed window is better than a single glazed units the benefit is largely determined by the thermal performance of the rest of the building i.e if the buildings performance is poor then having better windows will make little difference.
- 10.11 By way of further comment the applicant has noted that:
- (i) The appearance of double glazing would be identical
 - (ii) The thermal value of double glazing would be circa 1.2, with single glazing offering circa 5.8 and the thermal product suggested by FDC circa 3.6
 - (iii) The refurbishment of the ground floor allowed aluminium coated double-glazed windows in the most prominent front facing positions
 - (iv) Thought that all government departments were keen to see reductions in energy usage
 - (v) Why is FDC keen to see a grade II listed building go into disrepair because the building is thermally inefficient and customers can get more comfortable accommodation elsewhere.
- 10.12 It is also contended, based on anecdotal evidence, that the car parking area and town centre location both contribute to noise issues within the first floor area which interferes with functions although no noise report has been submitted to evidence this claim. Whilst there would be some merit in pursuing this argument in terms of the aims of Policy LP6 in so far as they relate to community infrastructure the case put forward would have to be evidenced and sufficiently robust to withstand external scrutiny.

Evaluation and consequences

- 10.13 Published guidance based on robust case studies and evidence over time outlines that the *benefits of double glazing over other methods of window repair are often over-estimated. Much of the comfort and energy efficiency benefits of new double glazing come from the reduction of draughts that will result from well-fitted window frames with integral draught-proofing. These benefits are also available through repair and draught-proofing of the existing windows, or from fitting secondary glazing.* Historic England advises that: *Secondary glazing when carefully designed and installed allows the original windows to be retained unaltered, and where necessary repaired, whilst reducing air leakage and conducted heat losses. As a result there is no loss of historic fabric and in most cases the installation is easily reversible.* It is also noted that secondary glazing also offers benefits in terms of noise reduction over and above double glazing as the larger gap between the panes, is a better sound insulator.
- 10.14 In this instance, particularly across the 1st floor of the front (Market Place) elevation, we are dealing with windows which match exactly the windows which were within the building when it was built. They reflect the original style and traditional single glazed construction of the original windows contributing to the building's architectural and historic interest, by perpetuating the character, materials and methodology of the original building. Where windows cannot be satisfactorily repaired any replacement windows should be on a like-for-like basis including being single glazed. It should be noted that there are new single glazing products on the market which demonstrate enhanced thermal values; these products used in conjunction with secondary glazing.
- 10.15 It is considered that the justification put forward by the applicant's representative is subjective and the scheme when considered against local and national policy and mindful of clear guidance on such matters, as published by Historic England, will not result in the significant public benefit required by policy to be achieved in order for support to be given.
- 10.16 To allow the use of double glazing in this building without appropriate and robust justification would undermine the Local Planning Authority's position in respect of future proposals for similar development; this in turn has the potential to erode the historic fabric of the district leading to significant detriment to our stock of heritage assets. Whilst there is obviously sympathy for the applicant's argument in terms of securing the long-term future of the premises it is not considered that the use of double glazing is the panacea to secure a draught free first floor.
- 10.17 Responding specifically to the matters raised by the applicants at Para 10.11 above, noting that the issue of building usage (10.11(v)) is dealt with at para 10.16 above:
- (i) Identical appearance: It is acknowledged that externally there would be little or no visual alteration, provided that the joinery details necessary to achieve the installation of slim-line double glazing did not impact on the overall profile of the windows. Internally however, the double-glazing would be apparent. Notwithstanding the visual appearance of the windows, the significance of the building would be diluted by the introduction of double glazing, because it would remove an element of historic understanding in terms of construction and materials, which have been replicated by earlier like-for-like repairs, thereby maintaining that significance and understanding.
 - (ii) Thermal value: The figures quoted represent general thermal values of the individual products; rather than specifically relating to how the building will

perform overall with the various glazing options installed. In the absence of a specialist energy audit it cannot be categorically asserted that the use of double glazing would offer significant benefit over and above that which would be achieved by the introduction of better fitting windows. An energy audit would also have the potential to pick up on other areas of required maintenance which may be contributing to the thermal performance within the building.

- (iii) Previous scheme at ground floor: The previous scheme (circa 2003) represented a complete alteration rather than a like-for-like repair or replacement. The original openings had been lost with an alteration to smaller windows and blocked in walls, undertaken sometime during the 1970s. All historic fabric and arrangements of doors and windows had therefore been lost. The scheme represented a return to the original character in a design which reflected the earlier arrangement. Because all historic fabric and detailing had been lost, there was such an opportunity as has been described above, where the harm caused by the introduction of a modern material, was outweighed by the benefit of architectural and aesthetic improvement, by returning to the building to something more like its original character.
- (iv) Energy efficiency: Whilst energy efficiency may be argued to be material in the consideration of this scheme, supported as it is by Policy LP14, this must be balanced against the heritage impacts of the proposal. Furthermore in the absence of a bespoke evaluation of the likely thermal efficiency of the building it cannot reasonably be inferred that the benefits accruing outweigh the heritage impacts in thermal efficacy terms.

11 CONCLUSIONS

- 11.1 Both national and local planning policy clearly state that unless there is substantial public benefit deriving from proposals that will ultimately result in harm to our heritage assets they should be resisted.
- 11.2 Published guidance based on robust research and case studies over time clearly demonstrates that double-glazing per se does not bring the level of benefits often anticipated. Furthermore the subjective 'benefits' anticipated from the use of non-traditional materials when balanced against the harm caused to this heritage asset has not been justified and accordingly it may not be supported.

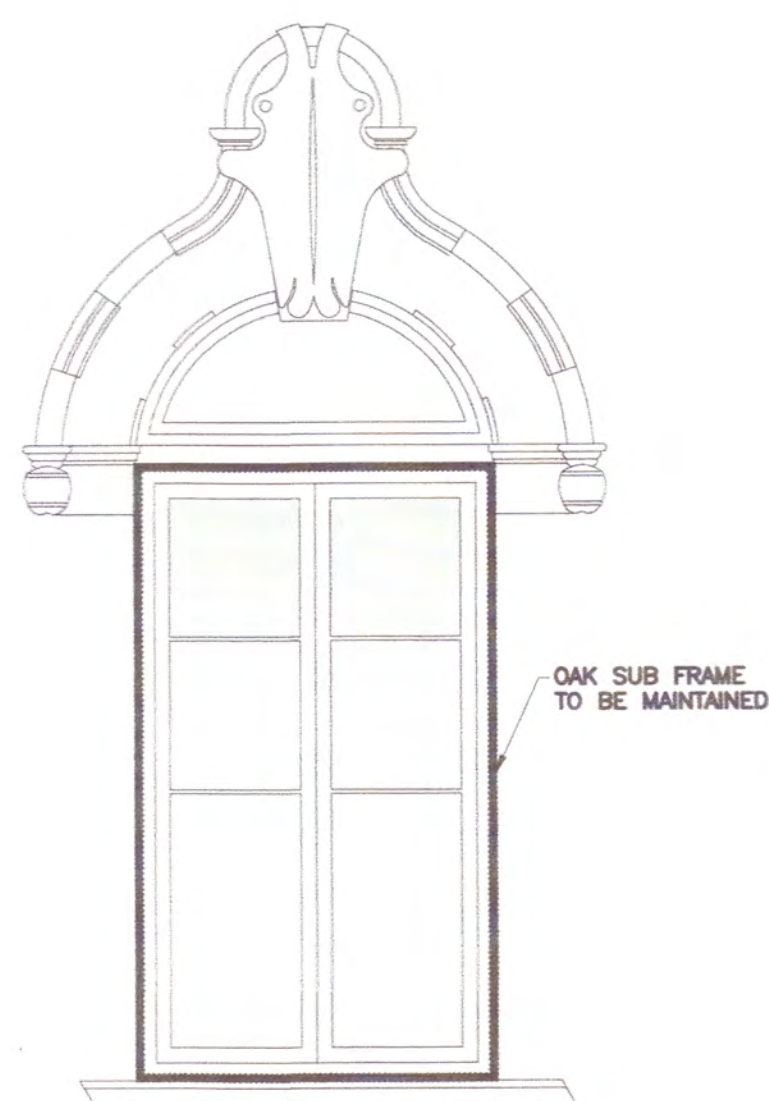
12 RECOMMENDATION: Refuse

- 1 Policy LP18, the National Planning Policy Framework (paragraphs 184-202) and sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 detail the consideration to be given to applications for works that affect the character and/or setting of listed buildings and conservation areas. The proposal to introduce double glazing to the replace the windows at first floor would represent a non-traditional alteration which would have a significant impact on the heritage value of the building; this would lead to substantial harm to the character of the building. The justification given with regard to the scheme proposal is limited and anecdotal and no evidence of public benefit would arise as a result of the scheme. These factors render the proposal contrary to the provisions of policy LP18 of the Fenland Local Plan (2014), and paragraph 195 of the National Planning Policy Framework (2014).

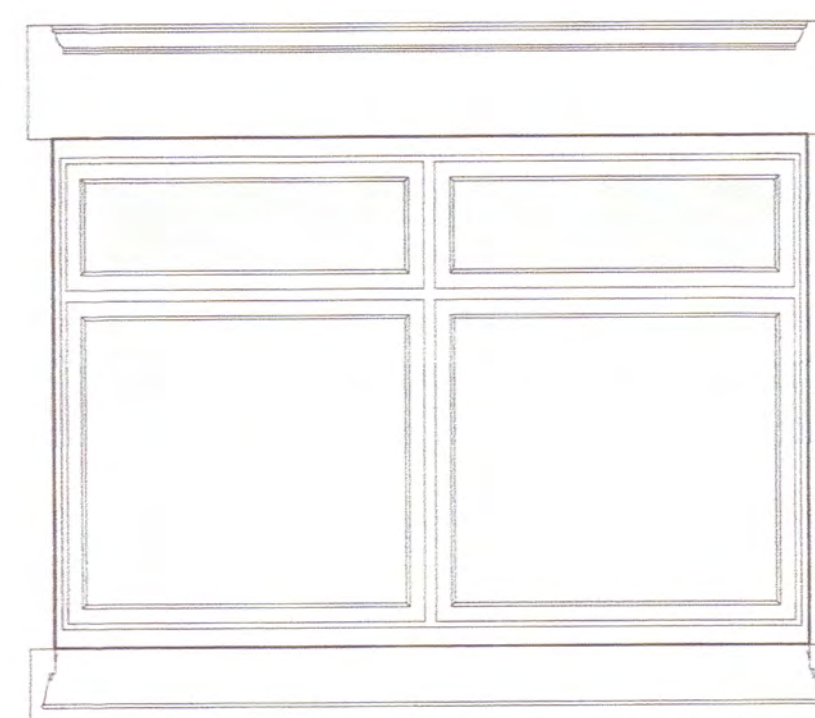




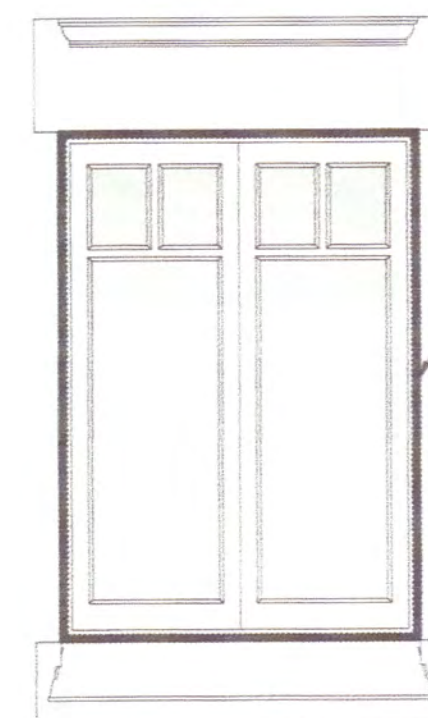
LOCATION PLAN 1:1250



WINDOW TYPE 1
- 15 No



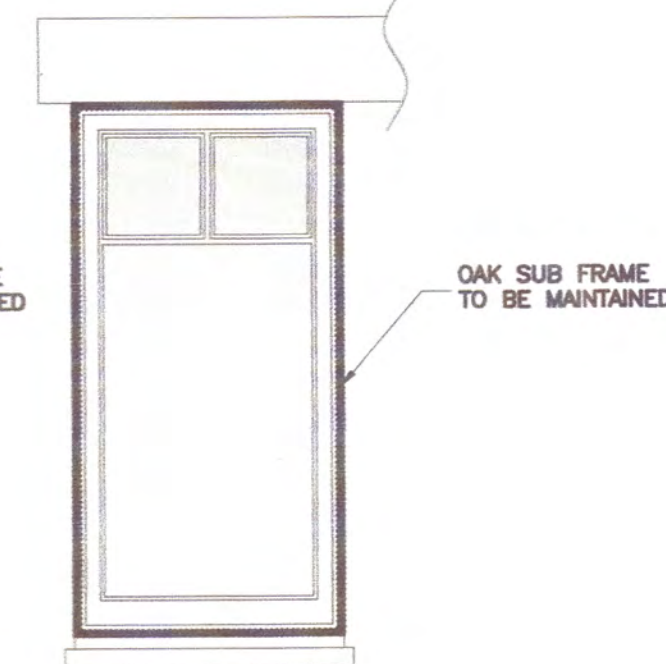
WINDOW TYPE 2
- 1 No



WINDOW TYPE 3
- 1 No



WINDOW TYPE 4
- 2 No



WINDOW TYPE 5
- 3 No



DAMAGE TO WINDOW 14



DAMAGE TO WINDOW 15
& WINDOW STAY



DAMAGE TO WINDOW 6



DAMAGE TO WINDOW 3



DAMAGE TO WINDOW 4



DAMAGE TO WINDOW 6



DAMAGE TO WINDOW 5



DAMAGE TO WINDOW 7



DAMAGE TO WINDOW 6



TIMBER FRAME WITH
EMBEDDED ALUMINUM

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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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Fenland District Council
Building
Design Awards
winner
Building Excellence in Fenland

CLIENT
March Civic Trust

PROJECT
March Town Hall
Market Place, March
PE15 9JF

TITLE
Window Damage Photos
Front, Rear & Left

DRAWN	DATE OF ISSUE
J.Scotcher	
CHECKED	
DATE	August 2018
SCALE	As Shown
DRAWING NUMBER	H5948/02



HATCHED SECTIONS NOT
TO BE CHANGED

EXISTING/PROPOSED FRONT ELEVATION
(1:50)



EXISTING/PROPOSED RIGHT HAND SIDE ELEVATION
(1:50)



EXISTING/PROPOSED REAR ELEVATION
(1:50)

**SINGLE (SG) SINGLE
GLAZING – INTERNAL
SECONDARY GLAZING PANEL**

**SINGLE (R) SINGLE GLAZING
– WINDOW TO BE REPAIRED**

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Fenland District Council
LABC 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 Elevations
Front, Rear & Left
Hand Side**

DRAWN J.Scotcher	DATE OF ISSUE
CHECKED	
DATE August 2018	DRAWING NUMBER H5948/01
SCALE As Shown	