

Design and Access and Heritage Statement

Site Location: 124 Middle Street, Deal, CT14 6JX

Proposed: Retrospective application for replacing all timber sliding sash windows; proposed replacement of black PVC-u gutter on the front elevation with half round black cast iron guttering and proposed change of colour of front door to 'Ravens Flight'



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1 Introduction

This report will discuss the site and location, details of the proposal and justification, relevant legislation, policies and guidance, identify the significance of any heritage assets, and then evaluate the impact of the proposals on their significance.

The design of the current scheme has been an iterative process, which has been informed by the constraints and opportunities of the site, the needs of the applicant and the national and local policy guidance.

This statement takes into account the advice given by Historic England in their advice note 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' 2019. Additionally it complies with the requirement set out in paragraph 12.7 of the Draft Dover District Local Plan.

2 Site and Location

The site is located on the eastern side of Middle Street, between Golden Street and Farrier Street, close to the junction with New Street.

It is a two storey house, with attic, dating from the latter part of the C19th. Rendered front elevation, painted white; three panelled front door to the right hand side, with bolection mouldings to the top two panels, under a rectangular fanlight. Timber four paned sash windows to ground and first floors, together with a large flat roofed dormer window, all under a Kent peg tiled roof. To the rear is a lean-to single storey extension under a slate roof, (see Figs: 1&2).

The building is Grade 2 listed and falls within the Middle Street Conservation Area.



Figure 1



Figure 2

3 Details of the Proposal and Justification

Full details of the proposals are given on the plans accompanying this application, but in summary they include;

1. Replace all the timber sash windows with new ones, incorporating slim profile double-glazed units. (Note: this part of the application is retrospective, as the work was carried out in 2014).
2. Replace the black PVC-u gutter on the front elevation, with half round black cast iron guttering.
3. Repaint the front door in Ravens Flight (black), (Note it is currently painted grey).

4 Relevant Legislation, Policies and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990: Sections 16(2), 66(1), 72(1)

Dover District Local Plan Core Strategy 2010: Policies CP1, DM1

Draft Dover District Local Plan (March 2023)

The submission Draft Local Plan is a material planning consideration in the determination of applications. At submission stage the policies of the draft plan can be afforded some weight, depending on the nature of objections to them and consistency with the NPPF.

Draft policies PM1 (design), HE1 (heritage assets)

National Planning Policy Framework (NPPF): Paragraphs 8, 11, 60, 82, 83, 126, 130, 134, 194, 195, 197, 199, 200, 201, 202, 203, 205, 206, 207, 208

The National Design Guide 2021

The National Planning Practice Guide

Dover District Heritage Strategy 2013 (updated 2020)

Making Changes to Heritage Assets, 2016: Historic England

The Kent Design Guide (2005)

Climate Change and Historic Building Adaptation. Consultation draft November 2023 Historic: England

5 Heritage Assets and their Significance

The proposals would have an impact, to a greater or lesser extent, on the character and appearance of the host building, which is Grade 2 listed, and the Middle Street Conservation Area, both of which are classed as designated heritage assets in the NPPF.

The NPPF defines significance as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from the heritage asset’s physical presence, but also from its setting’.

Setting is defined in the Framework as follows:

‘The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.’

It should be noted that paragraph 200 of the NPPF, also states that ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by the setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.

Significance of 124 Middle Street

The building is Grade 2 listed, and its list description is as follows;

‘Mid C19th. Two storeys stuccoed. Tiled roof with one dormer. One sash with verticals only. Simple doorcase with rectangular fanlight and panelled door. Included for group value’.

In summary the significance of the building is derived from a combination of factors, including; its physical appearance and location in the street; its age and use of traditional materials; its expression of the social and economic life of the period in which it was built, and the retention of some of the original plan form, including its original staircase.

Significance of the Middle Street Conservation Area

The Middle Street Conservation Area covers a wide area and consequently it can be subdivided into a number of character areas, as identified by the Dover Heritage Strategy. The special character of this part of the conservation area comprises a number of key elements, which can be summarised as follows, (see Figs: 3 & 4).

1. Predominantly two and three storey terraced houses;
2. A regular grid of streets, perimeter block development with tight street enclosure;
3. High density development with buildings sitting cheek by jowl with each other;
4. Buildings located at the back edge of the pavement;
5. A high number of historic buildings, many of which are listed;
6. The use of traditional building materials, including brick, render, Kent peg tiles and slate, with timber doors and windows;
7. A wealth of traditional architectural details.

These features produce a strong cohesive character.

It is worth noting however that although the front elevations have well-mannered front facades, the rear elevations have a far more eclectic and organic appearance, as properties have been extended and altered over time, reflecting the changing requirements and aspirations of their successive owners.



Figure 3



Figure 4

6 Impact of the Proposals on the Significance of Designated Heritage Assets

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, requires that when considering listed building applications, special regard shall be had to preserving listed buildings and their settings. Similarly section 66(1) requires that when considering planning applications which affect a listed building, special regard shall be given to preserving the building. Section 72(1) of the same Act requires that special attention shall be paid to preserving the character and appearance of conservation areas.

The NPPF outlines at paragraph 205, that great weight should be given to the conservation of designated heritage assets and the more important the asset the greater weight should be given. Any harm or loss of the significance of a designated heritage asset should require clear and convincing justification. The NPPF, at paragraph 200, requires the local planning authority, when assessing an application, to identify and assess the particular significance of any heritage asset that may be affected by a proposal.

Draft policies HE1 of the emerging Dover District Local Plan, seek to protect heritage assets, whilst Policy PM1 promotes a high quality of design, and these policies are broadly reflective of the National Planning Policy Framework.

The National Planning Practice Guide, offers more detailed advice on conserving and enhancing the historic environment, and states that 'The conservation of heritage assets in a manner appropriate to their significance is a core planning principle'. 'Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every-day use, to as yet undiscovered, undesignated buried remains of archaeological interest'.

Further national guidance is provided by Historic England in 'Making Changes to Heritage Assets' February 2016. This provides more detailed guidance on alterations to heritage assets, the aim of which is to 'recognise and reinforce the historic significance of places, while accommodating the change necessary to ensure that people can continue to use and enjoy them'.

Assessment of the proposals

1 Replacement of windows and use of slim-profile double-glazed units (retrospective)

The original windows were in a very poor state, and unfortunately beyond practical repair. Consequently they were replaced in 2014 with exact copies in terms of design and joinery details, including the use of sash cords and weights. Some of the internal cills were retained. As the glazing bars were quite deep, it was possible to fit slim-profile double-glazed units into the windows. The owner has since become aware of the need for listed building consent for these works, hence the submission of this retrospective application. It should be noted that

the District Council did not receive any complaints from members of the public about the works when it was carried out.

Historic England, who set national policies and standards for conservation generally in England, recently produced draft guidance on the implications of climate change, for the historic environment, called Climate Change and Historic Building Adaptation (draft for consultation Nov. 2023). The document was produced in order to provide clarity and to support consistent decision-making throughout the country. The final version has not been published yet, but it shows the direction of travel in terms of how we should evaluate proposals for listed buildings, which relate to climate change, and includes the use of double-glazing on listed buildings.

The document states that, 'To a greater or lesser degree our historic buildings must continue to change and evolve if they are to continue to contribute to a greener future and be fit for purpose for people who live in, experience and care for them'.

In addition it states that 'Buildings can and must adapt in response to climate change. It is not a question of 'if' but a question of 'how'.

The document specifically addresses the issue of using double glazing in listed buildings and states that 'The installation of slim-profile double glazing within historic frames will generally be acceptable'. Additionally, it states that 'The use of slim-profile double-glazing allows the installation of double-glazing in historic buildings while preserving the majority of the contribution made by their historic windows to their special interest'. An exception to this would be if it involved the removal of historic glass, but that is not the case in this instance.

In view of the above it is considered that the works, as carried out, do retain the appearance, character and significance of the listed building. The new windows are identical to the original ones in terms of their design and joinery details, and the slim-profile double glazing has no material impact on the appearance of the building, as such it is considered that they do not detract from the character and significance of the listed building, the conservation area or from the setting of any adjoining listed buildings.

2 Replace the black PVC-u gutter on the front elevation, with half round black cast iron guttering.

The existing modern black PVC-u guttering on the front elevation of the building leaks and is in poor condition, it is therefore proposed to replace this with black, half round cast iron guttering, which would drain into the existing cast iron hopper and downpipe.

The original guttering would have been made of cast iron, so this part of the application is simply replacing what would have been there originally. (Note, the existing cast iron hopper and downpipe will be retained).

In view of the above it is considered that the proposal would preserve the character of the listed building and the conservation area, and would not detract from the setting of any adjoining listed buildings.

3 Repaint the front door in Ravens Flight (black)

The existing front door is currently painted grey, and it is proposed to change this to Ravens Flight (black). Black is a traditional colour, and there are many examples of its use in this conservation area. It is not a strident colour and would not draw undue attention to the building. In view of this it is considered that this would be entirely appropriate in this particular context, and would not detract from the significance of the listed building, the character of the conservation area, or the setting of any adjoining listed buildings.

9 Wider Public Benefits

The works to the windows will not only help to improve the thermal efficiency of the building, thus helping to reduce greenhouse gases, making it fit for living in the C21st, but will also help to sustain the optimal viable use of the property, securing its long-term conservation for the benefit of the wider community.

10 Conclusions

The national and local planning policy context does not prevent all changes to historic buildings but moreover seeks to recognise what is truly significant about a particular heritage asset, whilst at the same time accommodating changes which allow people to continue to use them. This approach is stressed by Historic England in their publication 'Making Changes to Heritage Assets (February 2015). This states that 'An unreasonable, inflexible approach will prevent action that could give a building a new life: indeed it can eliminate that use. A reasonable and proportionate approach to owners' needs is therefore essential'.

Historic buildings should not be frozen in time or preserved in aspic, if they are going to provide a functional use and have an economic future. These proposals significantly improve both the appearance and use of the building, making it fit for living in the C21st, without detracting from its significance as a listed building, or from the character or appearance of the conservation area, or the setting of any adjoining listed buildings.

It is therefore considered that the proposed works would meet the requirements of Sections 16(2), 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990; the requirements of the NPPF in relation to the historic environment and design; Policies PM1 and HE1 of the Draft Dover District Local Plan together with national and local policy guidance on the issues raised by this application.

The Local Planning Authority is therefore invited to support this application which would bring tangible benefits to both the building and the wider community.

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