

[REDACTED]

From: Merlin Lewis [REDACTED]
Sent: 15 July 2026 15:11
To: Planning (SMDC)
Subject: FAO. Ben Hurst (Re. SMD/2026/0269 Hermitage Farm, Froghall Road, Froghall, ST10 2HQ our ref. 219833)

Categories: [REDACTED]

Your ref: SMD/2026/0269
Our ref: 219833

Hermitage Farm, Froghall Road, Froghall, ST10 2HQ

Listed building consent for a replacement of the current rotting single glazed windows with historically accurate wood-effect double glazed units. Replacement of all windows with wood-effect small pane double glazed units.

Dear Mr Hurst,

Thank you for notifying the SPAB of this application for Listed Building Consent. Unfortunately, the application fails to meet the requirements of national planning policy and would cause unjustified harm to the significance and special interest of The Hermitage. We therefore object to the application. We recommend that it is withdrawn and revised, or otherwise that it is refused.

Paragraph 207 of the National Planning Policy Framework (NPPF) sets out that '*local planning authorities should require an applicant to describe the significance of any heritage assets affected*' by proposals, to a level of details that is '*proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance*'. The application does not currently satisfy this requirement. It contains no meaningful assessment of the windows that are to be removed, other making the erroneous assumption that a diaspora of window types and / or designs is implicitly problematic or undesirable. Even if some of the existing windows have no heritage value, the fact that they do not match others is not, in and of itself, problematic. In any case, the significance of all of the windows must be examined and communicated as part of the application.

The application also fails, in our view, to correctly assess the impact of introducing composite '*wood-effect*' windows. The material and design of these windows is deeply inappropriate in the context of an historic listed building, and this is not offset or mitigated by any perceived benefit resulting from a unified or standardised appearance. Whilst terms such as '*historic design*', '*heritage-style design*' and '*historically accurate*' are used in the across the application, the proposed windows are not traditional or sympathetic in form, design, materiality, repairability or performance. Where current uPVC windows are in place, their replacement as proposed may not exacerbate existing harm. However, the replacement of traditional timber-framed windows with the proposed design certainly would.

In the first instance, a revised Heritage Statement is required which should meet the requirements of the NPPF and include a full window schedule. This is key to establishing a heritage baseline, which should then inform sensitive, conservation-led intervention(s). The applicant may find [Historic England's Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets](#) to be useful when preparing a revised HS.

Revisions to the application should then be made to incorporate proposals which better recognise and respond to the building's significance and character. [Historic England's Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency](#) and their [Traditional Windows: their care, repair and upgrading](#) offer clear guidance on how

this can be achieved. Importantly, historic traditional windows should be retained and conserved whenever possible, and new windows should be of appropriate design, specification and quality.

Any revised scheme should be accompanied by an impact assessment that thoroughly examines the effect of the proposed changes on the building's significance. Any harm identified should not be granted consent unless it is supported by the '*clear and convincing justification*' required by paragraph 213 of the NPPF.

We would ask to be notified of any revisions or new documents supplied to this application, so that we can review these and return constructive feedback. However, if this is not forthcoming then we must strongly recommend that the application is refused.

Yours sincerely,

Merlin

Merlin Lewis
Caseworker


Normal working days: Monday-Thursday

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