

Application Number: [24/01236/LBC](#)

Estimated reading time: 40 minutes

Proposal: Listed building consent for the replacement of ten wooden windows to the front and rear with heritage slim-line double glazed hardwood windows to match existing and retention of existing ironwork at 1 Manor Farm Cottages, Lower Weald to Calverton Road, Calverton, Milton Keynes, MK19 6ED.

Applicant: Ms Lorna Madden

Application type: Listed Building Consent Application

Ward: Stony Stratford **Parish:** Calverton

Statutory Target: 19/09/2024 **Extension of Time:** Yes - 28/11/2024

Case Officer: Jack Pope
Graduate Planner

Team Manager: Chris Nash
Development Management Manager

Summary

While the replacement of non-historic windows and windows considered to be beyond repair is acceptable in principle, the replacement of surviving historic windows is deemed unacceptable. Further information, including an assessment of the identified historic windows by a specialist in the repair of historic windows, is necessary in order to justify their replacement. At present, without this information, their replacement, and associated loss of historic fabric, is considered to cause harm to the heritage asset. Furthermore, and regardless of the assessment of the remaining historic windows, the detail of the proposed replacements is considered unacceptable and deemed to cause less than substantial harm to the significance of 1 Manor Farm Cottages, and the wider, listed, row of cottages. It is therefore recommended that listed building consent is **refused**.

1.0 Introduction

- 1.1 The application has been referred to the Panel as the applicant is married to an elected member of Milton Keynes City Council.

2.0 Background

The site and its context

- 2.1 The site comprises a two storey, end of terrace, thatched roof cottage dating to the 17th or early 18th Century. The ground floor front elevation of the property is constructed of local stone, laid in lime mortar, with painted brickwork to the first floor. Timber lintels sit above the windows and doors to the ground floor. The site forms part of a row of three cottages which form a prominent frontage to the northern part of Lower Weald.
- 2.2 To the south, the site is bordered by, and attached to, 2 Manor Farm Cottages. Together with 3 Manor Farm Cottages, the dwellings form the Grade II listed *“row of 3 cottages on Calverton Road south west of Manor Farm”*.

The proposal (to be read in conjunction with the plans pack)

- 2.3 The application seeks listed building consent for the replacement of 10 wooden windows to the front and rear.
- 2.4 A total of 5 windows are to be replaced to the front elevation (three on the ground floor and two to the first floor), while 5 windows to the rear elevation are to be replaced. Two of these windows are located on the original dwelling (one to the ground floor and one to the first floor), while the remaining three windows are on the rebuilt rear extension (one to the ground floor and two to the first floor).
- 2.5 The proposed windows would be double glazed, with flying mullions and trickle vents. All new windows will be handmade, of hardwood construction, and white in colour, both to the interior and exterior, with black monkey tail handles.
- 2.6 Additional information was received during assessment in order to justify the proposal. The applicant states that the design and form of the windows is necessary to meet building standards, mitigate the risk of falls, reduce issues with mould and condensation, enhance thermal energy efficiency and improve emergency egress in the event of a fire.

3.0 Relevant planning history

3.1 Application site

- 24/01235/HOU The replacement of ten wooden windows to the front and rear with heritage slim-line double glazed hardwood windows to match existing and retention of existing ironwork.
Application returned as planning permission is not required for the works.

07/00530/FUL	Restoration of three cottages including the demolition and rebuilding of a two-storey rear extension. Approved May 2007.
07/00531/LBC	Listed building consent for the refurbishment of three cottages including the demolition and rebuilding of a two-storey rear extension and construction of a new party wall Approved May 2007.
WL/2/59	Conversion of 4 cottages into 3 houses. Approved December 1959.
WL/856/57	Conversion of 4 cottages into 3 houses. Approved November 1957.

3.2 Site to the south - 2 Manor Farm Cottages, Lower Weald, Calverton, Milton Keynes, MK19 6ED

12/01842/LBC	Listed building consent for removal of modern partition between lobby and kitchen and fitting reused door to opening between kitchen and living room. Approved October 2012.
--------------	---

3.3 Site to the south - 3 Manor Farm Cottages Lower Weald Calverton Milton Keynes MK19 6ED

07/01368/LBC	Listed building consent for the underpinning of south gable wall. Approved November 2007.
22/02852/LBC	Listed Building Consent for minor internal works comprising the widening of an opening within the Kitchen. Approved January 2023.

4.0 **Consultations and representations**

All responses and representations received can be viewed in full, online at www.milton-keynes.gov.uk/planning-register using application ref. 24/01236/LBC. The following paragraphs summarise those responses and representations.

4.1 Calverton Parish Council

No response received.

4.2 Councillor Jennifer Wilson-Marklew (Stony Stratford Ward)

No response received.

4.3 Councillor Akash Nayee (Stony Stratford Ward)

No response received.

4.4 Councillor Joe Hearnshaw (Stony Stratford Ward)

No response received.

4.5 MKCC Archaeology

No response received.

4.6 MKCC Conservation

Initial comments

Objection. The proposed loss of the historic casements and glass would harm the listed building by removing original or early features that have survived to convey an insight into historic window components, design and construction, and would cause less than substantial harm (at the higher end of this range). The character is cumulative in the cottage and the windows are key in conveying this character and distinctiveness. Loss of the windows would cause disproportionate, irreparable harm to the building's appearance. This loss, without offsetting public benefits of equal or greater weight and a clear and persuasive justification, would be in contradiction of the Council's duties under legislation and national guidance.

Concerns are raised regarding the detail of the proposed replacement windows. This includes the presence of trickle vents, which would immediately give away their modernity, and the lack of the historic frame's central mullion (post) that the window casements currently close against in favour of a 'flying' false mullion. Historical, characterful glazing would be lost completely, rather than partially, to be replaced wholly by modern glass with no, rippled, reflective imperfections present in historical windows. The proposed windows are thus unacceptable.

They note the windows were repaired in 2007. However, the repairs utilised plastic fillers to correct voids in the woodwork as opposed to skilled joinery. Suggested the removal and repair of the windows and requested the exploration of whether secondary glazing could be installed. Advice is also given regarding the build-up of condensation.

Recommend the application is refused in principle and in detail as the proposals would result in the loss of the remaining historic windows and would harm the heritage interest and character of both the cottage and the row, without justified reasoning or wider public benefits. The proposed new window designs are also unacceptable and would cause further harm to the listed building.

Revised/additional comments (after the receipt of further documentation and an additional site visit)

Emphasises the proposed replacement windows are not heritage slim-line double glazing, as described in the proposal description, and are standard, contemporary double-glazing units.

Emphasises that 1-3 Manor Farm Cottages are an important contributor to the historic grouping of buildings associated with Manor Farm House, many of which are listed.

Acknowledges that the existing windows at the property vary in age, with some of the windows dating from the 2006/7 restoration of the cottages. Some windows from No.3 were possibly reused on the rear extension of No.1. The remainder of the windows fall broadly into two groups. Those of a regular ovolo moulding, generally with no historic glass, and those with a flattened ovolo moulding which retain historic glass, which are older. The ovolo moulded windows are difficult to date since they are of a traditional design and appearance that was common in the 19th and 20th centuries. It is possible that these windows were installed in one of the reorganisations of the cottages in the 20th century. These windows replicate the detail of traditional windows.

The replacement of non-historic windows from the 2006/7 renovation of the cottages and the windows dating to the late 19th or 20th century, which are in poor condition, are acceptable in principle, subject to the design their replacements. However, further assessment of the small grouping of remaining historic casements, which contain historic glazing, by a specialist in the repair of historic windows, is necessary to justify their replacement. The loss of these remaining historic windows, frames, mullions, and glass would cause harm to the significance of the designated heritage asset and special interest of the listed building.

The proposed replacement windows are unacceptable and cannot be considered as like-for-like replacements. This is by virtue of the proposed thickness of the double glazing, the use of a single double-glazed sheet of glass rather than 6 individual panes, 'stuck on' glazing bars, internal profile, and lack of external visibility of the flying mullion, the presence of trickle vents and design of the external beading and other features.

Objection remains. The principle of replacement of the majority of the existing windows is accepted. The replacement windows could incorporate slim heritage double glazing, with historic glass collected and incorporated into repaired earlier windows. However, the proposed replacement windows fail to replicate the traditional windows, and would cause harm to No.1, the row of cottages, the immediate grouping of designated heritage assets and the conservation area. There are no heritage public benefits to offset this harm, but other benefits will need to be considered with the appropriate weighting.

4.7 Representations from interested parties

No representations received.

5.0 Relevant policies, guidance and legislation

The Development Plan

5.1 [Plan:MK](#) (adopted March 2019)

- Policy HE1: Heritage and Development

National planning policy and guidance

- 5.2 The [National Planning Policy Framework](#) (NPPF) and [Planning Practice Guidance](#) (PPG) are also material considerations.

Emerging policy

- 5.3 The regulation 18 draft Milton Keynes City Plan (MKCP) was consulted on from 17 July to 9 October 2024. In accordance with paragraph 48 of the NPPF, Local Planning Authorities may choose to give weight to policies in emerging plans. At this stage, the Council, as local planning authority, has not determined to give weight to the draft MK City Plan 2050 for decision making purposes. However, supporting evidence may still be relevant, with it updating or informing existing policies of the development plan, listed above.

Legislation

- 5.4 In conjunction with the Town and Country Planning Act 1990 (as amended) (TCPA) and the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (PLBCA).

6.0 Planning considerations

- 6.1 Taking account of the application type, the documents submitted (and supplemented and/or amended where relevant), the site and its environs, and the representations received; the main consideration central to the determination of this application is whether the principle of replacing the windows is acceptable, along with the suitability of the replacements, in preserving the building or its setting or any features of special architectural or historic interest which it possesses.

7.0 Appraisal

- 7.1 Policy HE1 of Plan:MK states proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets, such as listed buildings. Proposals for alterations to listed buildings must be judged on any potential harm or enhancement to the significance of the heritage asset, and harm must be outweighed by public benefits to the scheme. Part G.2 of the policy also seeks to ensure that when assessing the potential harm caused, the character, appearance, special interest and setting of heritage assets is considered. When considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, as per paragraph 205 of the NPPF.
- 7.2 In addition, the local planning authority shall 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”*. This is supported by Section 16 of the NPPF, which requires that great weight is be given to the conservation of heritage assets and their setting. Where a development proposal will lead to harm to the significance of the designated heritage asset, this harm should be weighed against the public benefit of the proposal, including securing optimum viable use.

- 7.3 Numerous alterations and refurbishments have been undertaken to the three listed Manor Farm cottages. Though no date is given, 'The Cottages' Historical Account and Building Record (2007) confirms that the original windows at the property, which were either dark painted or stained timber, containing uniform diamond paned glazing throughout, with large plant shutters folding over the openings externally, were replaced.
- 7.4 In the early decades of the 20th Century, the 5 cottages were reduced to 4, with significant internal alterations, which included the construction of the present day first floor and installation of associated windows.
- 7.5 As noted in section 3 of the record, in 1957 permission was granted for the conversion of 4 cottages into 3 houses. As a result of this conversion, on the ground floor, only the left-hand side ground floor window, as viewed from the roadside, remained in-situ. The other two ground floor, front elevation windows installed circa 1957, replaced two previous front doors (one serving what is now No.1 and one serving the adjoining dwelling at the time. The first-floor front elevation windows remained in-situ. Works also included the construction of a white colour washed brick rear extension. Later alterations also occurred in 2007. There is a possibility some windows from No.3 were used in the reconstruction of the rear extension at No.1.
- 7.6 As a result of the above alterations, it is apparent that the windows in situ today vary in age and, as such, the windows can be grouped into three main categories. These are non-historic windows, historic windows (19th/20th Century) that are beyond repair, and historic windows where further assessment by a specialist in the repair of historic windows is necessary to determine whether their replacement is justified.

Principle of replacement

- 7.7 The first-floor rear elevation window on the rear extension (window 9) is not attributed to any of the above categories, as it possesses a different design and may have been repaired and/or transferred from an adjacent cottage during the 2007 works. The window has a trickle vent, a narrower mullion, and does not have any historic glass. As such, its replacement is justified in principle, subject to the design of the replacements.
- 7.8 The replacement of non-historic windows from the 2006/7 renovation of the cottages is also considered acceptable in principle, subject to the design of their replacements. These are the ground floor rear elevation sitting room (window 6), the first-floor rear elevation main bedroom (which does, however, have one historic glass pane) (window 7), the ground floor rear elevation kitchen (window 8), and the first-floor side elevation of rear extension bathroom (window 10).
- 7.9 The windows that are likely to date from the late 19th or 20th centuries contribute to the building due to their authentic traditional appearance rather than their historic fabric. These windows are also typically in poor condition due to the continued, heavy condensation. Given these factors, replacement of these windows is acceptable in principle, subject to the design of their replacements. These windows are the ground floor, front elevation living room and dining room windows (right hand side and middle windows when viewed from the street) (windows 1 and 2), which were replaced around 1957 as part of the reduction of the row of cottages from 4 to 3 dwellings.

- 7.10 This leaves a small grouping of historic windows. Their casements, historic glass within them, and surviving frame elements, such as mullions, contribute to the significance of the listed building due to the survival of historic fabric and their contribution to the traditional appearance of the building. These windows are the ground floor front elevation dining room window (left hand side when viewed from the street, window 3), the left casement (from outside) of the first-floor front elevation (right hand side from street, window 4), and the right casement (from outside) first floor front elevation window (left hand side when viewed from street, window 5).
- 7.11 Policy HE1 (G.3) of Plan:MK emphasises that architectural or historic features which are important to the character and appearance of the asset should be retained in an unaltered state. With respect to this element, there would be the loss of historic windows, frames, mullions and glass, and this would cause a high level of harm to the significance of the designated heritage asset and special interest of the listed building (it being, in part, total loss which sits normally within the highest impact category of 'substantial harm').
- 7.12 Policy HE1 (B) also requires an "*impartial and objective heritage assessment*" which should include a "*sound justification*" to establish the principle of alteration. The applicant has provided a brief assessment of the condition of the windows. However, having regard to the views of the Conservation Officer, this information at present is unsatisfactory. An in-depth assessment from a specialist in the repair of historic windows is required to examine the details of the existing historic windows, their condition, and their contribution to the listed building. The possibility of repair and a justification of this proposed loss of historic fabric, which contributes to the significance of the listed building, is also required. Where the principle of replacement is accepted, the assessment of the details of the existing historic windows is also essential to ensure the new window details replicate the historic form of the existing that remain.
- 7.13 Overall, the replacement of non-historic windows, and windows considered to be beyond repair, is acceptable in principle. However, this principle is not established and thus not considered acceptable as a full, detailed assessment by a specialist in the repair of historic windows should be firstly undertaken. The principle of the works is therefore not considered acceptable and does not comply with Policy HE1 and relevant parts of the NPPF.

Replacement windows

- 7.14 Whilst the principle of replacing some of the existing windows is justified given their more recent dating, assessment turns to considering their detail.
- 7.15 The proposed windows would be double glazed, with flying mullions and trickle vents. All new windows will be handmade, of hard wood construction and white, both to the interior and exterior, with black monkey tail handles. All casements would be operational and able to open and close.
- 7.16 The Conservation Officer concludes the proposed use of timber is acceptable. The proposed replacement windows would also be broadly flush across the front and have a layout that follows the existing windows, which again is considered appropriate. However, substantial concerns remain regarding a number of other details.

- 7.17 The proposed thickness of the double glazing, the use of a single double-glazed sheet of glass rather than 6 individual panes, 'stuck on' glazing bars, the internal profile and lack of external visibility of the flying mullion, the presence of trickle vents, the design of the external beading and other design features as outlined below, are unacceptable. This detailing in the replacement windows is considered to cause less than substantial harm to the character and appearance of the listed building, with minimal public benefits, contrary to Policy HE1.
- 7.18 The proposed double glazing is also *not* considered to be slim line as described in the description of the proposal. It comprises 28mm units that are commonplace on modern developments. Heritage double glazing is normally in the range of 11-13mm, and, as such, the proposed replacement windows are not heritage slim-line double glazing units. The impact of this is an increased depth of the window, which would be most obvious around the glazing bars (that are also significantly altered). It should be noted heritage slim-line double glazing was permitted on the adjacent Manor House, which also featured an uneven outer surface to replicate historic glass reflection. Such replacements would be suitable. However, presently the proposed double glazing would create a dual reflection – a modern phenomenon which is not currently present with the existing windows and not associated with historic listed buildings. As such, the windows presently proposed would be detrimental to the character and appearance of the listed building, and are not considered appropriate.
- 7.19 The existing 6 panes of glass per casement would also be replaced with a single 28mm double glazed unit per casement. This would remove the individual reflections of each of the existing panes, which provide a 'disjointed' overall reflection when the window is viewed a whole – a characteristic of traditional windows - and replace it with a standard reflection across each window, associated with modern windows. Due to the single pane, the glazing bars are also no longer structural, but simply stuck on the glass on the inside and out. This, combined with the 28mm depth of the unit, means that the internal and external applied glazing bars appear separated, even with a colour coded spacer within the unit. The overall effect is a much heavier, modern appearance to the window, which would prove detrimental to the character and appearance of the listed building.
- 7.20 The proposed designs also remove the presence of a central mullion from the external elevation. Traditional windows close to a central mullion, though the proposal seeks a flying mullion to aid escape in the event of an emergency. However, the design fails to follow the existing window design where the mullion is visible externally. The internal profile of the flying mullion does also not match with any of the existing windows. Though the removal of the central mullion is acceptable in principle, its internal profile and lack of external visibility is not.
- 7.21 Trickle vents are not a historical feature, and their presence on the proposed windows would immediately give away the modernity of the replacement windows. The applicant notes this is to comply with updated building regulations. However, Approved Documents F and L exempts listed buildings. Paragraph 0.6 states work "*should comply with the ventilation standards in this approved document where reasonably practicable*". However, the work should not "*unacceptably affect the significance of the listed building*". In this instance, with objection from Conservation Officer on this point, the presence of trickle vents would contribute to the less than substantial harm arising.

- 7.22 The proposed window detail also features an external beading that is a different shape to the existing putty and has a rebate next to the frame, thus producing a groove around the edge of the window. Additionally, the outside edge of the casements is angled which creates a gap between them and the outer frame. These are not features of the existing or traditional windows. Although not shown on the drawings, this latter difference highlights that the windows are likely to be hinged differently to the existing, which are simply hinged on the outside edge with the hinges visible externally. There is no information regarding how the windows are hinged, thus it is unknown whether it is a traditional arrangement, or an articulated hinge seen on standard modern windows.
- 7.23 Given the above differences between the proposed and existing windows, the replacements cannot be considered as like-for-like. The detail, as described above, of the proposed replacement windows are considered to cause cumulative harm and erode the character of the group of cottages which make up the Grade II listed group, causing less than substantial harm to the listed buildings.

Summary

- 7.24 First and foremost, it must be recognised that, aside from higher grades of listed building, the property sits at the top of the list of heritage assets to which policy HE1 applies. The policy is clear in its intent to preserve and enhance, directly reflecting the statutory obligation on the Council to discharge its responsibilities under section 66 of the PLBCA. The loss of all the earlier windows would lessen the cottage's authentic, historic appearance and its value as an insight into the history and development of rural housing. The installation of the windows as proposed would cause further harm to the designated heritage assets. This would fall within the bracket of less than substantial as set out in the NPPF, but at the top end of this sliding scale.
- 7.25 Where harm is caused to a designated heritage asset, the NPPF requires a "*clear and convincing justification*" for the works. Whilst the applicant has made an in-principle case for the repair of the modern and 19th /20th century windows and selected earlier windows that are in non-repairable state, there is no clear and convincing justification for the replacement of some older, traditional windows, nor the failure to replicate the existing windows in the replacements proposed.
- 7.26 The NPPF requires the harm caused to the heritage asset to be weighed against the public benefits delivered by a proposal. Policy HE1 of Plan:MK states that "*proposals that cause less than substantial harm to a designated heritage asset will only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme*". There are no tangible heritage benefits shown, with no evidence to indicate the future of the asset as a whole is under threat, nor are public benefits shown to be delivered by the proposal – instead, these being private benefits for the occupiers of the property in terms of heating costs. The safety concerns cited are also unsubstantiated, with the existing situation, either at No. 1 or Nos. 2 & 3 (or at historic properties elsewhere) not attributable to a lack of modern safety standards applied under building regulations.

Additional matters

- 7.27 Notwithstanding the issues with a high moisture content within the building and its negative effects on the building and occupants, which were evident and appreciated during site visits to the property, the application must be determined on an equal footing considering the legal and policy context, and whether justification for the harm arising at this time is adequate. Indeed, in conjunction with addressing the poor condition of the windows, the question of internal moisture levels will remain and requires expert advice and a strategy for resolving. It must be recognised that modern expectations for comfort in residential properties will differ from many decades ago, with the preference for warming internal climate creating a greater temperature contrast at the walls and windows of historic properties. The advice and any treatment plan should come from an appropriately qualified and experienced, preferably independent RICS registered, surveyor.

8.0 Conclusions

- 8.1 The currently proposal for complete replacement of all windows is considered unacceptable. However, given the windows in-situ vary in age and condition, the replacement of existing non-historic windows, and windows considered to be beyond repair, would be acceptable in principle. Further information, in the form of a detailed assessment by a specialist in the repair of historic windows, is required to determine whether the replacement of the surviving historic windows is justified. At present, however, their replacement would result in an unjustified loss of historic fabric which contributes to the significance of the listed building. Furthermore, the detail of the proposed replacements is considered unacceptable and would additionally cause less than substantial harm to the significance of the heritage asset.
- 8.2 None of the other matters raised through the publicity and consultation process amount to material considerations outweighing the assessment of the main issues set out above.
- 8.3 Where relevant, regard has been had to the public sector equality duty, as required by section 149 of the Equality Act 2010 and to local finance considerations (as far as it is material), as required by section 70(2) of the Town and Country Planning Act 1990 (as amended), as well as climate change and human rights legislation (including Article 8 and Article 1 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions).

9.0 Recommendation

- 9.1 It is recommended that permission is refused for the reason(s) set out below (as may be supplemented/modified in any accompanying written or verbal update to the Panel).

10.0 Reason(s) for refusal

1. The loss of historic fabric, in the form of historic windows, frames, mullions and glass, which communicate their age and significance, without clear and convincing justification would cause less than substantial harm to the significance and special interest of the designated heritage asset, with insufficient evidence presented to justify the proposals in

principle and no demonstrable public benefits to outweigh this harm, contrary to Policy HE1 of Plan:MK and provisions of section 16 of the NPPF.

2. The detail of the proposed replacement windows is considered to be unacceptable by virtue of the proposed thickness of the double glazing, the use of a single double-glazed sheet of glass rather than 6 individual panes, 'stuck on' glazing bars, internal profile details and lack of external visibility of the flying mullion, the presence of trickle vents and the design of the external beading. This detailing is considered to cause less than substantial harm to the significance and special interest of the designated heritage asset, with no clear and convincing justification or demonstrable public benefits to outweigh this harm, contrary to Policy HE1 of Plan:MK and provisions of section 16 of the NPPF.