

## Officer Report

Application No.	25/1446/FH
Site Address	FLAT 27, ST ANDREWS, THE DURLOCKS, FOLKESTONE, CT19 6AW
Officer Name	Laura Cook
Proposal	Temporary removal of a window and reinstatement with a new sill. As well as replacement lanterns to the roof.

## Recommendation

Report Number	RD-438482
Recommended Decision	Recommended to be Approve with Conditions
Recommendation Date	06 October 2025

## Report

### Site

The application site forms a self-contained flat within a large, detached building, St Andrews, with its associated chapel building to the northeast. The property is a 6-storey Grade II Listed building with rooms in the roof, located within the Folkestone Leas & Bayle Conservation Area.

It is finished in red brick with painted stone detailing around the windows and doors, a tiled roof and white painted timber windows.

The building is located on top of a cliff, overlooking Folkestone harbour. To the immediate south of the site is St Peters Church which is also a Listed Building.

The apartment subject of this application is located within the roof space on the top floor and is accessed internally via hallways, one at each end of the building.

### Constraints

Site of Special Scientific Interest – Impact Risk Zones  
 Archaeological Notification Area – Class 2  
 Conservation Area – Folkestone Leas and Bayle

### Relevant Site History

25/1461/FH - Listed Building Consent for the temporary removal of a window and reinstatement with a new sill. As well as replacement lanterns to the roof. Under consideration.

25/0771/FH/CON - Approval of details pursuant to condition 4 (stair balustrades), 5 (details of doors and wall), 6 (details of screens around trusses), and 7 (details of roof lanterns) of listed building

consent 24/1345/FH and condition 3 (detailed window joinery) and 4 (details of roof lantern) of listed building consent 24/1845/FH. Approved.

24/1845/FH - Listed Building Consent for the replacement of windows and rooflights. Glazing and frames throughout to be replaced with double glazed units, to include all dormer windows and pitched rooflights, roof lanterns to be repaired, made weather resistant and secondary glazing added. Roof repairs made to coverings and flashings. Approved with Conditions.

24/1826/FH - Replacement of windows and rooflights. Glazing and frames throughout to be replaced with double glazed units, to include all dormer windows and pitched rooflights, roof lanterns to be repaired, made weather resistant and secondary glazing added. Roof repairs made to coverings and flashings. Approved with Conditions.

24/1345/FH - Listed Building Consent for Internal renovation, remodeling and thermal upgrade within the existing confines of the apartment and the immediate communal hall and stairs with the creation of new entrances at fourth floor level on each side of the property. Approved with conditions.

24/1339/FH - Internal renovation, remodeling and thermal upgrade within the existing confines of the apartment and the immediate communal hall and stairs with the creation of new entrances at fourth floor level on each side of the property. Approved with conditions.

Y05/0562/SH – Listed Building Consent for removal of part of existing living room wall to form an archway together with other internal alterations. Approved.

The following entries relate to the conversion of the building:

86/1367/SH – conversion of existing hotel to form 44 self-contained flats and extension to car park. Approved with conditions.

88/1092/SH – Conversion of hotel into 27 self-contained flats. Approved with conditions.

88/1097/SH – Listed Building Consent for the conversion of the hotel to 27 self-contained units. Approved.

93/0140/SH – conversion of church/Camelot Hall into 14 self-contained flats with associated car parking and new vehicular access. Approved with conditions.

93/0141/SH – Listed Building Consent for conversion of church/Camelot Hall into 14 self-contained flats. Approved with conditions.

### **Proposal**

Planning Permission is sought for the temporary removal of a window and reinstatement with a new sill, including the replacement of three lanterns to the roof, with upgraded glazing and temporary fixings at mortar joints for scaffolding in the northeast facade.

To enable the works approved under planning permissions 24/1345/FH, 24/1826/FH, and 24/1845/FH to be carried out, it is proposed to erect scaffolding and establish a temporary access point for materials onto the site. This includes the installation of scaffolding along the north-east elevation of the property and the temporary removal of a fourth-floor window. The window would

be securely set aside and reinstated upon completion of the works. As part of this process, the existing rotten sill is proposed to be replaced with a like-for-like timber sill. Additionally, the proposal includes the replacement of the three roof lanterns, rather than their repair as previously approved under application 24/1826/FH. The new roof lanterns would be like-for-like in design but would incorporate double glazing in place of the existing single glazing and Perspex.

### **Consultation Responses**

Consultation responses are available in full on the planning file.  
Folkestone Town Council – No Objection.

### **Representations**

No representation have been received.

### **Relevant Policies**

Places and Policies Local Plan 2020

HB1 (Quality Place Through Design)

HB8 (Alterations and Extensions to Buildings)

Core Strategy Review 2022

### NPPF

Chapter 16 – Conserving and enhancing the Historic Environment; Paras. 202-214

Chapter 16 of the NPPF requires the impact on the significance of the designated heritage asset to be considered and where potential harm is identified, the harm needs to be categorised as either "less than substantial harm" or "substantial harm". The National Planning Practice Guidance (NPPG) states that whether a proposal causes substantial harm will be a judgement for the decision maker, but it also makes it clear that substantial harm is a high test.

The NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise, that harm might be. Any harm to or loss of the significance of a designated heritage asset should require clear and convincing justification. Where a proposal would result in less than substantial harm, the NPPF requires that it is weighed against the public benefits of a proposal. Heritage benefits are a public benefit to consider in the weighing exercise.

### NPPG

Historic Environment

Planning (Listed Buildings and Conservation Area) Act 1990

Section 66(1) requires special regard to be had to the desirability of preserving the Listed Building or its setting or any special architectural or historic features it possesses.

Section 72(1) requires special regard to be had to the desirability of preserving and enhancing the Conservation Area and/or its setting.

### **Appraisal**

Design, Visual Appearance and impact on the Listed Building and Conservation Area

In addition to the requirements of Policies HB1 and HB8, consideration must be given to the site's location within the Folkestone Leas and Bayle Conservation Area, which is of architectural and historic significance. In accordance with paragraphs 202–214 of the National Planning Policy Framework (NPPF), any potential harm to the significance of the heritage asset must be carefully assessed.

The building, constructed in 1881 by a notable architect, holds historical importance within Folkestone. The chapel was added at a later date. Its elevated position on the cliff makes it a prominent and visually striking landmark when viewed from the harbour and across the wider Conservation Area. While the building has undergone various changes in use, it retains many original external features. Internally, alterations have been made, including the installation of a lift and modern staircases between the fourth and fifth floors, likely as part of its conversion to residential use. The original roof structure remains visible within the apartment.

The application includes:

- Temporary removal of a window and reinstatement with a new white-painted timber sill.
- Replacement of three roof lanterns with upgraded double-glazed units.
- Temporary scaffolding fixings to the northeast façade, with mortar repairs upon removal.

The temporary removal of the window is intended to facilitate internal renovation works. As the window will be reinstated with a matching sill profile, there will be no permanent impact on the building's character or appearance. This element is therefore considered acceptable.

The scaffolding fixings, necessary for safe access during works, will have a negligible and temporary impact on the heritage asset and the street scene. Upon removal, the fixing holes will be repaired using a mortar mix of 1 part Clay Pit Sand, 1 part Lime, and 1 part Cement, which will match the existing mortar profile. This approach is considered appropriate and will not result in harm to the listed building or Conservation Area.

In terms of the roof lanterns, as illustrated in Figure 9 of the submitted Heritage Statement, the apartment occupies what was likely the original attic space. The conversion works, believed to have taken place around 1988, introduced the existing dormers and roof lanterns. These lanterns are therefore later additions and not original features of the building. The proposal seeks to replace the three roof lanterns and associated glazing to improve thermal performance. In line with Historic England guidance, traditional windows in listed buildings should be repaired or replaced on a like-for-like basis if beyond repair. The proposed replacements would be white-painted timber frames with double-glazed panels, using like-for-like materials. Given that Flat 27 is located within the roof space and the alterations would not be visible from public viewpoints, the proposal would not affect the building's outward appearance or its significance as a heritage asset. While double glazing is generally discouraged in listed buildings due to potential changes in glazing pattern and reflectivity, the specific circumstances of this case—namely the non-original nature of the lanterns and their limited visibility—make the proposed upgrade acceptable.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building, its setting, and any special architectural or historic features it possesses. This duty has been fulfilled in the consideration of this application.

The proposed works are considered to have no harmful impact on the significance of the listed building or the wider Conservation Area. The requirements of Section 16 of the NPPF and Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 have been met. The development is also considered acceptable under Policies HB1 and HB8, with no objections raised.

### Residential Amenity

The proposal involves the replacement of existing windows and openings only, with no new openings being created as part of the works on site. There are therefore no concerns regarding the proposal on amenity protection grounds.

The application is considered to preserve neighbouring amenity and would conform with the criteria of policies HB1 and HB8 of the PPLP.

### Highways and Parking

Parking would not be affected given the nature of the proposed development.

### Other Matters

Given the nature of development, it is not considered that it would result in any harmful impact on SSSI or to buried heritage assets. It is not considered that any mitigation measures would be required in this case.

### **Human Rights**

I have also taken into account the human rights issues relevant to this application. In my view, the Assessment section above and the recommendation represents an appropriate balance between the interests and rights of the applicant (to enjoy his land subject only to reasonable and proportionate controls by a public authority) [and the interests and rights of those potentially affected by the proposal (to respect for private life and the home and peaceful enjoyment of their properties)] and the wider public interest.

### **Duty to Cooperate**

In accordance with paragraph 39 of the National Planning Policy Framework (NPPF), December 2024 the Council takes a positive and proactive approach to development proposals focused on solutions. We work with applicants/agents in a positive and creative way by offering a pre-application advice service and, where possible, suggesting solutions to secure a successful outcome and as appropriate, updating applicants / agents of any issues that may arise in the processing of their application.

### **Public Sector Equality Duty**

In determining this application, regard has been had to the Public Sector Equality Duty (PSED) as set down in section 149 of the Equality Act 2010, in particular with regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. It is considered that the application proposals would not undermine objectives of the Duty.

In accordance with paragraph 38 of the National Planning Policy Framework, the Council takes a positive and proactive approach to development proposals focused on solutions. We seek to work with applicants/agents in a positive and creative way by:

- Offering a pre-application advice service;
- Where possible, suggesting solutions to secure a successful outcome; and
- As appropriate, updating applicants/agents of any issues that may arise in the processing of their application.

In this instance the application was acceptable as submitted.

**Recommendation**

In light of the above, it is considered that the proposal is appropriately designed and complies with the development plan policy and the NPPF and is therefore recommended for approval subject to conditions.

**Recommended Conditions (4)**

1

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason:

In pursuance of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2

The development hereby permitted shall not be carried out except in complete accordance with the following approved drawings and documents:

23132 P510 Existing & Matching Proposed Roof Plan. Existing & Matching Proposed Roof Lanterns, New Lantern with Double Glazing, Existing Photo Roof Lantern, Notes Support - Received 04.08.2025

23132 P511 Existing Floor Plan, Existing Elevation, Photo of Northeast Elevation, Notes of works - Received 04.08.2025

23132-P512 Roof Lantern Condition Photos - Received 04.08.2025

23132 E011 Site Location Plan - Received 04.08.2025

24-10-31 Rev 1 Heritage Statement - Received 04.08.2025

Reason:

For the avoidance of doubt and in order to ensure the satisfactory implementation of the development in accordance with the aims of Places and Policies Local Plan.

3

The development hereby approved shall be carried out in accordance with the details of materials as specified in the application, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

In the interests of visual amenity.

4

The replacenment roof lanterns shall be carried out in accordance with the details approved pursuant to condition 4 of Listed Building Consent 25/1461/FH.

Reason:

To safeguard the characteristics of the building and locality and to ensure special regard is paid to the interests of protecting the special architectural and historic character detailing the integrity of the Listed Building under Section 16 of the Planning (Listed Building Conservation Areas) Act 1990.