



# Pre Planning Application Assessment Report

## WINDOW REPLACEMENT TO A GRADE II LISTED HERITAGE ASSET

10 Anderson Street London SW3 3LZ

This project got planning approval.  
Kensington & Chelsea Planning LB/25/01172.

Pre Planning Application Research by Draw Plans Architectural Design Studio  
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## Pre Planning Application Assessment Report Introduction and Proposal Summary

**Site Context:** Basement and Ground Floor Flat, 10 Anderson Street is part of a three-storey plus basement end-of-terrace in Chelsea, within the Royal Borough of Kensington and Chelsea (RBKC). The building is **Grade II listed** (a designated heritage asset) and situated in the Chelsea Conservation Area. It exemplifies a 19th-century Chelsea townhouse style – yellow stock brick on upper floors with white-painted stucco at ground level and traditional sash windows.



Diagram 1: The surrounding street has a consistent historic character with similar terraces.

**Proposal Details:** The application seeks listed building consent for replacement of four timber sash windows at ground floor (front and side elevations), upgrading them from single glazing to slim double-glazed units. The new windows would be made of timber to match the original design, with slender double glazing intended to improve thermal performance while preserving the appearance. As the property is a flat, a parallel planning permission application was also required for the exterior alteration. No changes to the window openings or style are proposed beyond the glazing upgrade – the aim is a like-for-like appearance with enhanced efficiency.

**Key Considerations:** The assessment focuses on: (1) Heritage impacts – preserving the listed building’s special architectural interest and the character of the conservation area; (2) Design and materials – the fidelity of the new windows to traditional detailing; and (3) Policy compliance – consistency with national and local planning policies on conservation and design. Particular attention is given to whether replacing historic single glazing with slim double glazing is acceptable in principle, considering both energy benefits and any effect on the building’s historic fabric and appearance.

## Heritage and Policy Context

**Statutory Duties:** As a listed building in a conservation area, the proposal is governed by the **Planning (Listed Buildings and Conservation Areas) Act 1990**. The Council must pay **special regard** to preserving the building’s architectural or historic interest (Section 16(2)) and ensure the development **preserves or enhances** the character and appearance of the conservation area (Section 72). This sets a high bar for alterations – especially to prominent features like windows – to avoid harm to heritage significance.

**National Policy (NPPF 2021/2023):** The National Planning Policy Framework requires “great weight” be given to conserving designated heritage assets. Any harm to a listed building (such as loss of historic fabric or change in appearance) must be clearly justified. *Substantial harm* is generally not permitted unless outweighed by exceptional public benefits, and even *less than substantial harm* (the more likely category for window alterations) must be weighed against public benefits (para. 202). In practice, this means the proposal’s heritage impact should be minimal or counterbalanced by benefits like improved energy efficiency or building maintenance, to be found acceptable.

**Local Plan Policies (RBKC 2024):** Kensington and Chelsea’s Local Plan contains stringent conservation and design policies, recently updated in 2024. Relevant policies include:

- **Policy CD3: Heritage Assets – Conservation Areas** – Requires development to preserve or enhance the character or appearance of the area. Changes should respect the established architectural rhythm and materials in the street. In this case, the consistent pattern of multi-pane sash windows on Anderson Street is a defining feature to be maintained.

- **Policy CD5: Heritage Assets – Listed Buildings** – Seeks to protect the special architectural or historic interest of listed buildings. Alterations should not erode significant historic fabric or detailing, and should be carried out in an appropriate, “scholarly” manner. Essentially, any replacement must *match the original* in design, profile, and material, so the building’s significance is sustained. The Council typically imposes conditions to ensure new work is indistinguishable from historic fabric, in terms of workmanship, colour, profiles, etc. This policy is directly applicable to replacing windows – original features should be retained and repaired where possible, and if replacement is justified, the new windows must replicate the originals closely.
- **Policy CL1/CL2 (Design)** – (From earlier local plan, now integrated into CD policies) Emphasize that developments should respect the local context and architectural detail. Though not heritage-specific, these principles mean the window replacements must exhibit high quality design and materials in keeping with the period building.

**Conservation Area Guidance:** The site lies in the Chelsea Conservation Area, which has published appraisal/guidance documents emphasizing the importance of historic windows. According to the Chelsea Conservation Area Proposals Statement, original window patterns on terraces are to be respected: *“any replacement windows diversifying from the established pattern will be discouraged. Window frames should match the original materials. Aluminium and plastic windows are totally out of place [on historic buildings]”*. In other words, maintaining the historic style and material (timber) is essential – modern-looking alterations (e.g. uPVC, altered glazing bar patterns) would harm the area’s character and are generally refused. The existing windows at No.10 are multi-paned timber sashes typical of the Georgian/Victorian style, contributing to the uniform terrace appearance. The guidance suggests that as long as new windows replicate the originals in pattern and material, the character of the conservation area will be preserved. Conversely, an inappropriate change (for example, replacing timber sashes with uPVC casements) would conflict with conservation area policy and almost certainly be refused.

**Historic Building Significance of Windows:** Windows are recognized as a key element of historic building significance – they reflect the architectural style, technology, and craftsmanship of the period. No.10 Anderson Street’s sash windows likely date to the building’s 19th-century origin (or are later like-for-like replacements). They have slender glazing bars and proportions that align with the rest of the terrace (notably, Anderson Street houses are cited as good examples of unified window pattern in the area). The RBKC Conservation and Design policy documents stress that original fabric should be retained wherever possible: *“the*

*original historic fabric of the listed building should be retained unless specifically authorised for removal... Where elements are in poor condition, repair and restoration should be undertaken with minimum intervention*". This means the applicant must justify that replacing the windows is necessary (due to decay, poor condition, or previous unsympathetic alterations) rather than repairing them. An assessment of the existing windows' condition would typically be part of the application's Heritage Statement – if the windows are rotten or not original, there is a stronger case for replacement; if they are original and repairable, policy leans toward repair. Given that consent is being sought, we assume the proposal argues that new double-glazed sashes are needed for reasons of condition or improved performance that cannot be achieved with the old single-glazed frames.

**Energy Efficiency and Retrofitting Policy:** Improving energy performance of historic homes is a recognized objective, and RBKC has signalled support for sensitive retrofits. Notably, the Council has recently adopted a Local Listed Building Consent Order (LLBCO) for window works (October 2024), which automatically grants consent for certain window improvements on Grade II listed buildings without a full application. Under this order, owners can install *secondary glazing* to any windows, or even replace existing modern windows with double-glazed units, provided: (a) the window being replaced is itself a later (non-historic) replacement installed with consent after the building was listed, and (b) strict conditions on design are met. The LLBCO does not cover replacing genuinely historic windows – those still require individual consent – but it demonstrates the Council's acceptance in principle that slim double-glazing can be added to listed buildings *with minimal visual impact*. The LLBCO documentation states that historically the Council was reluctant to allow double glazing in listed buildings, but *"the advent of slim double-glazing units means there is now likely to be a very limited change in appearance over single glazing. Replacement of non-historic windows, including with double glazed windows or units, is now regularly granted consent in listed buildings"*. This is an important precedent: it confirms that as long as the appearance is similar, upgrading to slimline double glazing is considered compatible with heritage conservation objectives in RBKC.

In summary, the policy context sets a clear expectation that the external appearance must remain traditional – especially on the principal elevation – and any loss of original fabric be justified and minimized. The proposal will be judged on how well it preserves the look of the building and area (through matching design/materials), and whether the heritage harm (if any) from losing old windows is offset by mitigating factors or public benefits (like improved sustainability).

## Assessment of Heritage and Design Impacts Design and Visual Impact on the Building and Area

**Retention of Traditional Appearance:** The proposed new windows are designed to be indistinguishable from the originals in style. They will be purpose-made timber sash windows with the same profiles, dimensions, and opening method as the existing. The photographs of the property's ground floor show a typical Georgian-style arrangement – multi-pane sashes with slender glazing bars (likely 6 over 6 panes) and a white painted finish.



These contribute strongly to the building's historic character. The applicant intends to replicate these features exactly. Crucially, the material remains timber (the original material), and the profile of the frames and glazing bars will be matched. By avoiding any modern substitutions (no uPVC or metal framing, no altered window pattern), the proposal adheres to the conservation area guidelines that replacement windows must not diverge from the established pattern or material palette. Visually, once installed, the new double-glazed sashes should look virtually the same as the traditional single-glazed ones, thereby preserving the façade's appearance. This ensures the character of both the listed building and the streetscape is maintained. The uniform row of sash windows along Anderson Street – noted as an important

unifying feature of the terrace – would remain intact.

**Slim Double-Glazing – Aesthetic Considerations:** The introduction of double glazing could potentially affect appearance in subtle ways, but the use of “slim” profile double-glazed units is meant to minimize these differences. Slim double glazing (often 10–16mm overall thickness) can fit within traditional sash frames without major changes to the profile. From the exterior, the main visual difference might be a slight double reflection in the glass and a marginally deeper window recess. However, modern heritage glass products have addressed many issues: low-reflectivity coatings and low-profile glazing bars can make slim double-glazed units almost indistinguishable from single glazing in most lighting conditions. The Council’s own guidance acknowledges this: previously, adding double panes was seen as an “incongruous and harmful” alteration to historic windows, but now *“vacuum glazing units, slimmer still, are capable of insertion in existing frames... with no harm to the special interest of the building... slim double-glazing units [cause] very limited change in appearance over single glazing”*. In practice, many listed building consents in RBKC have been granted in recent years for slim double glazing in sashes, indicating the visual impact is considered acceptable so long as detailing is right.

To ensure authenticity, glazing bars in the new sashes will be true divided lights or have integral spacer bars aligning with any internal divisions – stick-on/imitation glazing bars are typically not permitted as they would look flat and “unauthentic”. Likewise, the glass should be clear with no obvious tint; traditional single glass has a slight green hue when thick, but slim units are thin enough that any tint is negligible. Conditions of consent are likely to require that the glass be indistinguishable in clarity from the original (e.g. no highly reflective coatings that give a mirror effect). With these measures, the visual integrity of the windows is maintained. In sum, the double-glazed replacement windows are expected to closely mimic the originals, and thus the aesthetic impact on the building’s exterior is neutral. A passerby on the street should not notice any difference in the window pattern or appearance after the works – this satisfies the test of preserving the conservation area’s appearance.

Front vs Side Elevation: The proposal affects windows on both the front (street-facing) and side elevation at ground floor. Front elevation changes are usually more sensitive because they impact the public streetscape. In this case, the side elevation of No.10 might face a secondary street or mews but is still visible (as an end-of-terrace, both façades contribute to the street scene). All replaced windows will be treated with the same care. Notably, there is precedent in some strict heritage contexts (e.g. Bath) where inspectors allowed double glazing on less prominent rear elevations but not on front elevations, due to concern over uniformity. However, in the Anderson Street case, the side elevation is also street-facing (on a corner), and

both front and side windows are equally part of the building's character. The applicant is not distinguishing between them, proposing high-quality replacements on all affected elevations. Given RBKC's evolved stance on slim double glazing, it is likely to accept the change on the principal elevation as well, provided the appearance remains traditional. There are multiple local examples where front facade sash windows have been upgraded to double glazing with Council support. For instance, a nearby application at 49 Smith Street (also in Chelsea) proposed upgrading two front ground-floor sash windows from single to double-glazed, explicitly stating the new units would "match the existing ones closely in style" – indicating that such alterations, if faithfully executed, are viewed favourably in principle.

**Impact on Streetscape and Conservation Area:** By retaining the historic design, the proposal preserves the unity of the terrace. Anderson Street's character is defined by its late Georgian/early Victorian terraces with vertically proportioned sash windows and stucco detailing. The conservation area appraisal notes that where original glazing patterns survive, they should be respected as "the norm," and any replacement that *diverges from the established pattern will be discouraged*. In this case, the pattern (multi-pane white timber sashes) is being kept. The only change – the glass itself – does not alter that pattern or the sash proportions. Thus, the effect on the conservation area is neutral: the building will look the same as before, thereby preserving the area's historic appearance. There is no intensification of development or new element that could be considered out of place; it is a one-for-one replacement in visual terms.

It is also worth noting that the replacement of deteriorated windows can be a visual improvement if the existing ones were in poor repair. Often old sashes can suffer from warping, peeling paint, or crude secondary glazing additions – new well-finished replicas could refresh the facade. As long as the new joinery is of high quality (profiled to match the period detailing), the change may even enhance the building's presentation slightly, while still being authentic. In summary, the design and visual impact are wholly in line with policy expectations: the scheme will preserve the appearance of the listed building and its setting within the conservation area. No harm to the streetscape's character or the terrace's unity is anticipated.

## Impact on Historic Fabric and Significance

**Loss of Original Fabric:** A key heritage concern is the potential loss of historic fabric – the existing sash windows (frames, glass, fittings) themselves are part of the listed building. If these windows are original (circa 19th century), removing them does

constitute a degree of harm to the building's authenticity, since original material is irreplaceable. In such cases, the Council will scrutinize whether the windows could be retained and repaired instead. RBKC's policy and listed building guidance strongly favour repair over replacement: *"Where these elements are in poor condition, repair and restoration [should] be undertaken with the minimum amount of intervention... original fabric... should be retained unless specifically authorised for removal"*.

Therefore, the applicant must have provided justification – for example, a window condition survey indicating severe rot or damage that makes repair impractical. It may also be that the windows in question are not original but later additions (e.g. 20th-century replacements); if so, their heritage value is lower and replacing them is less problematic. The wording of the application ("traditional timber sash windows") doesn't clarify age, but suggests they are of traditional style; they could be decades-old replicas. If they were installed after the building's listing (and with consent), they might even fall under the "non-historic" category the Council's LLBCO contemplates. In that scenario, replacing them with better-quality double-glazed versions would cause no loss of historic material at all – it would be an enhancement of significance (through improved functionality) without any true harm.

On the other hand, if the sashes are original 19th-century fabric, their removal is a loss of some historic value. The significance of those original windows lies in their historic glass (often old glass has a wavy character), handcrafted joinery, and antique fittings. Reproductions, no matter how skilled, are new fabric and do not carry the same historical authenticity. This is classified as *"less than substantial harm"* under the NPPF – not destroying the building's significance entirely but diminishing it to a degree. The Council would need to weigh this harm against any public benefits (e.g. improved energy efficiency, comfort for occupants, potential longevity of new windows if the old were failing). Energy improvement can be seen as a public benefit in terms of sustainability and climate change objectives, albeit mostly it benefits the occupants. RBKC has declared ambitions for environmental upgrades of historic housing stock, so facilitating slim double glazing could align with broader policy goals (Greener Borough, etc.). If the harm is very minor – for instance, because the appearance is unchanged and perhaps some elements of the old windows (frames or ironmongery) might even be retained during replacement – the Council may conclude that the benefit of having sound, energy-efficient windows that secure the building's future outweighs the slight loss of historic fabric. Notably, the Listed Building Consent conditions typically require salvaging and reusing historic elements where possible and making sure new work ties in seamlessly. In practice, the council might impose a condition that any original glass or features removed are properly recorded or even conserved if feasible (for example, sometimes original glass can be retained in a secondary frame for display, though that is uncommon for small proposals).

Overall, assuming the justification is satisfactory, the loss of historic fabric is likely considered mitigated by: (a) the minimal visual change, and (b) the benefits of new high-performance windows prolonging the building's life and comfort. The special interest of the listed building – which largely lies in its external architectural character as part of a terrace – will be preserved. Internally or structurally, nothing else is affected. The proposal does not alter plan form or decorative interiors (it's solely window units), so the impact on the listed building's overall significance is quite limited in scope.

**Conditions and Safeguards:** The Council's decision, if approving, would certainly include conditions to protect heritage quality. We can anticipate conditions such as: all new windows shall exactly match the existing in design, dimensions, profiling and detailing; the glazing must be slim-profile (often a specific maximum cavity thickness is stated, e.g. "no greater than 12mm overall" to ensure slimness); use of putty glazing or a traditional putty profile to secure the glass (rather than modern timber beading that can look too flat); and perhaps submission of joinery details or section drawings at a large scale (1:5) for approval before manufacture. These conditions ensure that what is promised (a like-for-like appearance) is delivered in execution. Given the proposal description and likely positive officer view, such details can be handled via conditions rather than requiring modifications. Another condition typically included for listed building works is the standard time limit (3 years to commence work) and a reminder that all works must adhere to approved drawings. An informative might also be added urging the applicant to salvage any decorative elements and notify the Council if unexpected historic fabric is uncovered during works (standard listed building informative). These measures collectively guard the heritage interest.

In conclusion on heritage fabric: the proposal appears to strike an appropriate balance between conservation and adaptation. By following a like-for-like approach, it respects the significance of the building. Any minor harm from replacing old fabric is countered by careful replication and the acknowledged minimal change resulting from slim double-glazing technology. Provided the justifications (condition of windows, etc.) are sound, the scheme would meet the tests of local and national policy for managing change to a listed building. The special architectural interest of No.10 (its external Georgian character) will be preserved, thus satisfying Local Plan policy for listed buildings. Likewise, the character and appearance of the Chelsea Conservation Area will be unharmed – in fact, preserved – by this faithful replacement, in line with policy CD3 and the statutory duty.

## Precedent and Similar Cases

It is helpful to note how similar proposals have fared in this borough to gauge the likely outcome:

- **Council Practice:** Kensington & Chelsea has a consistent record of resisting unsympathetic window alterations on historic buildings. For example, applications to replace timber sashes with uPVC have been routinely refused as detrimental to heritage, citing conflict with multiple conservation policies. This reinforces that keeping timber material and original design (as proposed here) is essential. In the subject proposal, this requirement is met – the scheme avoids the pitfalls that have caused refusals elsewhere (no change in material or window style).
- **Approvals with Slim Glazing:** In recent years, the Council has shown willingness to approve timber window replacements incorporating slim double glazing, especially when the existing windows were not historic or were beyond repair. Apart from the LLBCO (which effectively pre-approves many such changes borough-wide), there are specific cases: we mentioned 49 Smith Street SW3, where an upgrade to double glazing on a listed building was proposed in 2025. There is also evidence in the planning records of numerous consents for double-glazed timber sashes in conservation areas (often as part of renovation projects). The inclusion of conditions referencing policy CD3 and CD5 in approvals indicates the Council ensures such works are done in a manner that safeguards heritage significance. The case at 10 Anderson Street itself is likely informed by officers' experience with these precedents – slim double glazing in timber sashes has become an accepted solution to balance conservation with modern needs.
- **Appeal Decisions:** Although none from RBKC are cited here, a relevant insight from other jurisdictions (e.g. Bath, as in an appeal case from 2015) showed that if double glazing noticeably disrupts a uniform historic façade, it could be deemed harmful. In that Bath example, the inspector found double-glazed sashes on the front elevation of a listed terrace would introduce a reflective “double image” and slight thickness that was incongruous, and thus did not permit them, whereas rear elevation changes were allowed. This conservative stance is increasingly less common as slim glazing improves, but it serves as a caution: the work must be done to a high standard to avoid any perceivable change. RBKC's current approach – allowing slim units and even facilitating them via policy – suggests it considers that standard achievable. The design plans for No.10 presumably demonstrate that the external sections of the sash

(meeting rails, glazing bars, etc.) will match the original exactly, mitigating the concern noted in older appeals. As long as those details hold true, an appeal scenario is unlikely; the Council itself can support the proposal as meeting its criteria for sensitive alteration.

- **Public and Stakeholder Feedback:** While not explicitly provided, one can anticipate that groups like the Chelsea Society or local conservation area advisory groups would be consulted. In general, such groups favor retention of original windows but may acknowledge the acceptability of like-for-like double-glazed replacements in certain cases (particularly if the original windows were already gone or decayed). If any objections were raised, they likely would revolve around ensuring the replacements truly match and that there is justification for not repairing the old windows. The Council's report would address these points, emphasizing the conditions to secure proper detailing, and the reasoning (e.g. energy improvement, condition issues) for replacement. There is no indication of controversy on this application, as it aligns with the direction of policy and was probably supported by the Council's conservation officers during pre-application discussions.

## Conclusion – Likelihood of Approval

Considering the above analysis, the proposal to replace four timber sash windows with slim double-glazed equivalents at 10 Anderson Street appears consistent with planning policy and conservation best practice, suggesting a high likelihood of approval. The applicant has adhered to the fundamental requirements for listed building alterations: maintaining the building's historic appearance, using appropriate materials (timber, true glazing bars), and proposing a change that causes negligible visual impact on the Chelsea Conservation Area. By opting for slim-profile double glazing, the scheme achieves modern energy efficiency standards without compromising the aesthetic integrity of the heritage asset. This approach aligns with RBKC's own guidance that such upgrades can be done with "very limited change in appearance" and are now regularly allowed in listed buildings.

**Policy Compliance:** The proposal meets the intent of RBKC Local Plan policies CD3 and CD5: it preserves the character of the conservation area and the special interest of the listed building. The design matches the original windows, thus upholding the architectural unity of the terrace – exactly what local policy and the conservation area guidelines call for. There is no introduction of inappropriate elements (no plastic, no altered window design), so it avoids the pitfalls that normally lead to refusal. In fact, subject to conditions ensuring faithful execution, the scheme can be seen as a

positive intervention – prolonging the building’s life and energy performance while respecting its heritage. The statutory tests are satisfied as the character and appearance of the area are preserved and the building’s significance is unharmed in any meaningful way.

**Heritage Impact Balance:** If the existing windows are original fabric, the change entails a minor loss of authenticity; however, this is mitigated by the retention of the original appearance and the likely benefits (reduced heat loss, improved comfort and possibly noise reduction for occupants). The level of harm (if any) would be assessed as “less than substantial” and at the lower end of that spectrum. In the context of NPPF para.202, the public benefits – including sustainability improvements and preventing future deterioration of aging windows – can be argued to outweigh that slight harm. Moreover, if the windows were no longer sound or had started to be replaced in the past, the proposal could actually enhance significance by standardizing high-quality historic-style windows throughout. There is no conflict with national heritage policy in this respect.

**Conditions of Approval:** It is expected that any consent would include robust conditions to ensure the new windows are built and installed to appropriate standards. For example: *“All new sash windows shall be of timber, with glazing bar profiles, sections, and reveals to exactly match the existing windows, and finished in white paint to match the existing colour. The double-glazed units shall be of slim profile (nominal 12mm or similar) with clear glass and no external alteration to the putty line, in order that the replacements are indiscernible from the originals.”* Such a condition (similar in spirit to the one actually imposed) would guarantee the Council’s objectives are met. Compliance with approved drawings will be required, and the work must commence within three years. An informative will remind the applicant to seek approval for any unforeseen changes and to preserve any historic fabric not covered by the consent. These are standard and ensure the development is carried out sensitively.

**Overall Likelihood:** Given the Council’s grant of listed building consent for very comparable proposals and the clear alignment of this application with policy and guidance, the prospects of approval are strong. One can conclude that the proposal is well-founded in planning terms. It respects the heritage constraints and demonstrates how historic buildings can be subtly upgraded for efficiency without harming their character.

**Recommendation:** The assessment finds no policy grounds for refusal – on the contrary, the scheme furthers conservation objectives by ensuring a long-term viable use of the building with improved performance. Provided the work is executed as

promised, the replacement of the windows should successfully preserve the architectural character of 10 Anderson Street and its contribution to the conservation area. The application is therefore likely to be viewed favourably by the planning authority, as a carefully considered balance of preservation and improvement.

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