Arnall, Guy

From: Arnall, Guy
Sent: 23 October 2025 13:14
To: benjamin.cromwell@newportnorse.co.uk
Subject: LBC Application 25/0794 - Charles Williams Church In Wales Primary School High Street Caerleon Newport NP18 1AZ

Dear Ben

Re: LISTED BUILDING CONSENT FOR REPAIR AND REPLACEMENT WORKS TO THE JUNIOR SCHOOL BUILDING TO INCLUDE REPLACEMENT OF A NUMBER OF SASH AND CASEMENT WINDOWS, BRICK WINDOW SURROUND TO SASH WINDOW TO BE REPLACED WITH BATHSTONE, THE MAINTENANCE TO SOFFITS, FASCIAS AND RAINWATER GOODS AND THE MAINTENANCE TO WINDCATCHERS

The Junior School building in question was constructed between 1907 and 1909, with later extensions added in the 1960/70's. Though not listed in its own right, the building falls under the GII* listing protection of the Endowed School, meaning alterations are subject to listed building consent.

1. **Legislative and Policy Framework**

Section 96 of the Historic Environment Wales Act 2023 states that:

(1)On determining an application for listed building consent, a planning authority or the Welsh Ministers may grant or refuse consent.

(2)In considering whether to grant listed building consent, a planning authority or the Welsh Ministers must have special regard to the desirability of preserving—

(a)the listed building to which the application relates,

(b)the setting of the building, and

(c)any features of special architectural or historic interest the building possesses.

(3)Listed building consent has effect for the benefit of the listed building and the land on which it is situated, and of all persons for the time being interested in the building and land; but this is subject to the terms of the consent.

Section 4 of The Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024 states that:

4.—(1) An application for listed building consent must include with it a statement referred to as a heritage impact statement.

(2) A heritage impact statement must—

(a)describe the special architectural or historic interest of the listed building to which the application relates and its significance, with particular reference to the part of the listed building affected by the works,

(b)explain the objective that the works are intended to achieve and why they are desirable or necessary,

(c)include a summary of the options considered for the purpose of achieving the objective in sub-paragraph (b) and the reasons why the proposals to which the application relates are preferred,

(d)describe the works and the design principles which have been applied to them,

(e)include a schedule of works,

(f)describe how the works will affect the character of the listed building as a building of special architectural or historic interest, including an assessment of the impact of the works on the significance of the building, and

(g)describe how issues relating to access to, or in, the listed building have been dealt with, but excluding issues relating to access to, or in, any part of a listed building which is used as a private dwelling.

The primary objective of Planning Policy Wales (Edition 12, February 2024) is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015.

PPW12 takes the seven Well-being Goals and the five Ways of Working as overarching themes and embodies a placemaking approach throughout, with the aim of delivering Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places. It also identifies the planning system as one of the main tools to create sustainable places, and that placemaking principles are a tool to achieving this through both plan-making and the decision-making process.

Chapter 6 – Distinctive and Natural Places: Recognising the Special Characteristics of Places (The Historic Environment) - is relevant to the assessment of this application, in particular the following statements:

The Welsh Government's specific objectives for the historic environment seek to…safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved and…preserve or enhance the character or appearance of conservation areas, whilst the same time helping them remain vibrant and prosperous; (para 6.1.6)

For listed buildings, the aim should be to find the best way to protect and enhance their special qualities, retaining them in sustainable use. The continuation or reinstatement of the original use should generally be the first option, but not all original uses will now be viable or appropriate. The application of planning and listed building controls should recognise the need for flexibility where new uses have to be considered in order to secure a building's survival or provide it with a sound economic future (6.1.11).

The demolition of any listed building should be considered as exceptional and require the strongest justification (6.1.12).

Applicants for listed building consent must be able to justify their proposals, show why the alteration or demolition of a listed building is desirable or necessary and consider the impact of any change upon its significance. This must be included in a heritage impact statement, which will be proportionate both to the significance of the building and to the degree of change proposed (6.1.13)

PPW is supported by a series of more detailed Technical Advice Notes (TANs), including TAN 24: The Historic Environment (May 2017).

Paragraph 5.13 of TAN24 advises that when determining a listed building consent application, the local planning authority should consider the following issues:

The importance and grade of the building and its intrinsic architectural or historic interest.

The physical features of the building which justify its listing and contribute to its significance, (for example its form and layout, materials, construction and detail) including any features of importance such as the interior, which may have come to light after the building's inclusion on the list.
The contribution of curtilage and setting to the significance of the building, as well as its contribution to its local scene.
The impact of the proposed works on the significance of the building.
The extent to which the proposed works would bring substantial community benefits for example, by contributing to the area's economy or the enhancement of its local environment.

It further advises that:

The listing grade may be a material consideration but is not in itself a reliable guide to the sensitivity of a building to alteration or extension. For example, many grade II buildings are humble, once common building types, listed precisely because they are relatively unaltered examples of their kind and their special interest can be damaged by inappropriate alteration or extension. (para 5.13)

Many listed buildings can sustain a degree of sensitive alteration and extension to accommodate continuing or new uses. Past changes that reflect the history of use and ownership may themselves be aspects of the special interest of the listed building. When applicants and the local planning authority assess the heritage values and significance of a listed building, which is the subject of a consent application, they must consider the sensitivity of that building to the proposed changes. Sustaining the special interest and significance of a listed building through the process of alteration, extension or re-use is exacting, and should always be based on specialist knowledge and skill in order to realise the benefits that well-designed interventions can bring (para 5.14).

Other relevant evidence or policy guidance include:

- CADW, Conservation Principles (2011)
- CADW, Managing Change to Listed Buildings in Wales (2017)
- Cadw, How to Improve Energy Efficiency in Historic Buildings in Wales (2022)
- HE, Traditional Windows: their care, repair and upgrading (2017) (Endorsed by Cadw)
- HE, Energy Efficiency and Historic Buildings Secondary Glazing for Windows (2016) (Endorsed by Cadw)

2. <u>Observations</u>

Regarding the replacement of historic windows, Cadw's How to Improve Energy Efficiency in Historic Buildings in Wales (2022) states that:

"Historic windows, whether original or later insertions whose design follows historic patterns, usually make an important contribution to the significance of historic buildings. When they do, they should be retained and repaired where possible; if beyond repair they should be replaced with accurate copies.

Replacement windows whose design does not follow historic patterns are unlikely to contribute to significance unless they relate to an important later phase.

Replacing such windows with new windows of a sympathetic historic pattern, whether single-glazed or incorporating slim-profile double- glazing, may enhance the character and appearance of the building.

Early materials (such as forest-grown hardwoods and softwoods, and hand- wrought iron) were of a quality and durability that it would now be difficult or impossible to match and should always be retained.

Rarely windows will be in such a poor state that complete replacement is less expensive than repair and upgrading.

Usually even very neglected windows can be brought back into condition relatively easily and upgraded with systems such as secondary glazing."

Regarding the replacement of historic glass, the same document states that:

"Single glazing can be replaced with double glazing/ insulated glass units (IGUs), but unlike secondary glazing, this will not directly reduce draughts or heat transfer through the frames; it can, however, be combined with draught proofing.

Where historic windows or replacement windows of historic pattern survive without historic glass it may be possible to introduce slim-profile double-glazing without harming the significance of the building. There are compatibility issues to consider as the introduction of double-glazing can require the renewal of the window frame or the alteration of glazing bars to accommodate thicker glazing.

Vacuum IGUs are relatively expensive, and where safety glass is required, a protective film will need to be applied.

Construction details such as hand-made and early machine-made glass, and finely moulded glazing bars are important features that should be retained.

IGUs are energy-intensive to manufacture and have a short lifespan; the thin IGUs often fitted into older window frames may be even more energy-intensive owing to both the low thermal-transfer gases they contain and their shorter lifespan."

I would concur with the above: historic windows (whether original or later insertions whose design follows historic patterns), can make a very strong contribution towards Evidential, Historical and Aesthetic Value of a historic asset. In this case, the windows are large and prominent, forming a substantial proportion of the building's elevations and generally make a very strong contribution towards its special interest.

However, there is tangible variation across these windows. Though their general form is the same, the south-east elevation shows variation in window size and material - and in their masonry surrounds. For example, from the evidence provided, two sash window pairs (with brick surrounds) clearly still hold imperfect *Cylinder* (or perhaps *Polished Plate/Drawn Flat Sheet*) glass, suggesting original or at least very early built fabric in these locations. These windows therefore make a very strong contribution towards significance. Elsewhere on the same elevation, later plate glass can clearly be seen within timber sash frames - but it is currently unclear whether the joinery is original fabric or later replacement. Furthermore, that single window with a Bath Stone surround, suggested to be original within the HIA, contains a later metal-framed casement window (of lower significance). If it is true that "*Due to the construction of the windows cannot be replaced without removing the brick window surround internal or externally*", does it not follow that the Bath Stone is more likely to be a later detail, with the highly decorative brick surrounds being original to the asset?

It seems likely that such variation across the south-eastern elevation results from those changes to planform visible within OS map regressions, wherein several out-shots to this earliest portion of the building have been built and then lost over time. Is this the case?

Similarly, and though the general pattern is the same, there is clear difference between the large casement windows to SE and SW elevations. The former is more ornate, with pronounced mullion and transom sections

(matching those windows to the NE and NW). The casement to the SW elevation appears to be a modern face-closing insertion of considerably less interest. It is unclear from submitted information which form you propose to reproduce.

As things stand, I would conclude that your HIA analysis needs to be much more granular in its analysis, in terms of both assessment and impact, in order to conform with policy and guidance – particularly Section 4 of The Listed Buildings and Conservation Areas (Procedure and Interest Rate) (Wales) Regulations 2024.

Therefore, you will need to provide:

- Numbering of windows on the elevation drawings, cross-referencing with...
- A more detailed assessment of condition. Here, you will need to produce very strong evidence that your original/early windows cannot be repaired and retained.
- A more detailed assessment of significance (for both window joinery and masonry surrounds), drawn from closer analysis of the available evidence (both documentary and material)
- More detailed drawings of the proposed windows (see below)
- A re-evaluation of the impact following from the above.

Currently, I would argue that:

- The existing fabric provides material evidence for changes of the building over time, and it ought to be retained and carefully repaired, with well-designed secondary glazing installed (as per Cadw-endorsed HE guidance).
- This will have potential to save a considerable amount of significance, money, and energy (compared to the number of DG units required for the current proposals).
- Special architectural and historic interest of the listed asset will not be preserved by the current submission.

<u>Note</u>

1. As part of any application, we would expect to see:

- Detailed side-by-side drawings (for easy comparison) annotated with dimensions, normally:
    - Existing and proposed window elevations
    - Existing and proposed vertical window sections
    - Existing and proposed horizontal window sections
    - Larger scale details for 'horns' etc
    - All of which show the visible dimensions (including their position within their masonry surrounds).
- Details of proposed frame paint colour.
- We would generally recommend Hardwood or Acetylated Timber (such as Accoya) is used. Modern softwoods are very fast-grown and generally have none of the longevity of historic 'first growth' timber, which is much less prone to decay over time.

Please also note that, as the proposed works do not constitute alteration to a non-dwellinghouse, the work does not benefit from 'permitted development' rights and a Planning Application needs to be submitted alongside this LBC.

Many thanks,

Guy Arnall

Prif Swyddog Treftadaeth / Principal Heritage Officer

Swyddog Dirprwyedig (Adeiladau Rhestredig) / Delegated Officer (Listed Buildings)

Adfywio a Datblygu Economaidd / Regeneration and Economic Development
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