**IHBC Guidance Note –**

**Alterations to Historic Buildings**

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*This one of a series of occasional IHBC Guidance Notes published by the Institute of Historic Building Conservation (IHBC). IHBC Guidance Notes offer advice on topics that we consider crucial to the promotion of good built and historic environment conservation policy and practice.*

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**ADVICE ON ALTERATIONS TO LISTED BUILDINGS**

**Foreward**

The Guidance Note has been produced in response to widespread concern by IHBC members about the current absence of detailed advice regarding the appropriate alteration of historic buildings within the framework of the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires *inter alia* special regard to the desirability of preserving a listed building and any features of special architectural or historic interest, which it possesses. This does not necessarily preclude change although this must be well informed and fully justified. Inappropriate or ill considered alterations should not be permitted.

The advice in the Guidance Note does not obviate the need for planning permission for ‘development’ under planning legislation where necessary but both may not be required under all circumstances and practitioners need to satisfy themselves of the correct position in each case.

The government withdrew its national policy guidance - PPG15 (1994) in 2010 and with it Annex C – Guidance on the Alteration of Listed Buildings [which also dealt with appropriate forms of repair **[1].** Historic Scotland similarly withdrew its parallel Memorandum of Guidance (1996) Appendix 1 - Guidance for the Detailed Consideration of Listed Building and Conservation Area Consent Cases, which was subsequently reorganised.

It is the view of a number of experienced IHBC practitioners and others that in a number of respects the more generic guidance that replaced both documents is not adequately clear and fails to provide the level of detail that practicing heritage professionals consider is essential for proper day-to-day heritage management.

The evolution and continued relevance of the detailed advice withdrawn by central government is set out in more detail in Appendix 1 to this Note.

The clear principles and detailed advice on the everyday alterations to listed buildings set out in Annex C and the Memorandum had evolved over several decades and is generally considered to have stood the test of time. They continue to have relevance and practical application in the work of local planning authorities and the Planning Inspectorate, and can still meaningfully inform proposals by users of the planning system. Nevertheless, in the absence of current guidance with the imprimatur of the government, the Institute considers it entirely proper that such advice should continue to be available for the correct approach to many recurring heritage issues of alteration.

The Institute is aware of variations between some practitioners in local authorities and those in private practice regarding the interpretation of the current generic guidance on alterations to listed buildings, and also inconsistencies of interpretation from one local authority area to another.

Advice in PPG15 Annex C and the Historic Scotland Appendix 1 did not attempt to anticipate every eventuality, every type of building or form of alteration, or the use or replacement of every kind of building material. It is recognised that the application of guidance should not be proscriptive and must sit comfortably and appropriately with the physical evidence and acknowledge regional variations in construction and local distinctiveness and respect local traditional practices.

Notwithstanding the comprehensiveness and evolution of guidance between 1987 and 1994 **[2]** thematic issues continue to emerge (such as the conversion of basements and cellars in London) that the original advice did not anticipate. The Institute therefore sees this Guidance Note as an evolving document covering such new matters as they arise.

Alterations to listed buildings require listed building consent and are usually subject to the imposition of conditions when the consent is issued and these are required to be implemented in full. It is recommended that this Guidance Note is read in conjunction with the Institute’s national set of listed building consent conditions, accessible at <http://ihbconline.co.uk/toolbox/guidance_notes/stdCondits16.html>

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ALTERATIONS TO LISTED BUILDINGS - GENERAL PRINCIPLES

1. These guidelines are concerned principally with works of alteration and by association, partial demolition or extension, affecting the special architectural and historic interest comprising the character of a building and requiring listed building consent. The ages, range and types of listed building is considerable and while the description of them in the statutory list cannot be comprehensive, the characteristics and features that make up the special interest will be usually summarised, at least for the principal frontage. These characteristics should be given full weight in evaluating the impact of listed building consent applications, together with other factors, particularly the importance of keeping listed buildings in viable, sustainable and economic use whenever possible. Much of the guidance might equally apply to repairs but this Guidance Note is not a manual of repair.
2. This guidance refers to the impact of alteration on the special architectural and historic interest. This is the test in the 1990 Planning (Listed Buildings and Conservation Areas) Act. Subsequently national planning guidance and heritage advice has referred to ‘significance’ although this is not enshrined in statute nor clearly defined by the courts.
3. Consideration of relative significance or degrees of significance will therefore need to be appraised with some care and such judgment and discernment is not only necessary but should be viewed proportionately. It is not suggested here that special architectural and historic interest and significance are necessarily interchangeable with the former more clearly related to fabric and the latter to values.
4. Although the guidance is in many instances both detailed and specific, some applications, particularly those that relate to buildings that have been the subject of later alterations and additions, may call for finely balanced and difficult judgments.
5. Almost every listed building will have unique characteristics, usually related to the original or subsequent function and this should be respected as far as possible in any proposals for alterations. Special interest is not necessarily restricted to a particular type of building or just its external elements. Other aspects may range from the orientation or plan form to the arrangement of window openings or small internal fixtures of significance.
6. In considering alteration proposals for listed buildings the retention of building characteristics that exhibit local distinctiveness should be encouraged. When undertaking alterations, the use of appropriate materials local to the area will reinforce this and may also encourage the production or supply of such materials (or salvaged materials) when these sometimes become available to assist apposite alteration.
7. Alterations should be based on a proper understanding of the structure. Many listed buildings that have not been subject to major disturbance can continue to provide adequate service despite evidence of former structural defects that have arisen from their age, original methods of construction or past use. If there is doubt, appropriately qualified specialist conservation engineering advice should be taken where necessary. **[3]**
8. The boundary between repair and alteration may not always be clear. Sometimes listed building consent will be required even when the works comprise low-key, re-instatement works or strengthening the structure. This will be a matter of judgment depending on the nature and extent of the work. To ensure survival of as much historic fabric as is practical, new work should always be fitted to the old, not sacrificed merely to accommodate the new.

1. Information about the history and evolution of the building should always inform the proposed alterations. This may come from the physical evidence in the building itself. The original form of construction may be elicited from clues include the ghosts of lost features in plaster, rough edges where features have been cut away, or empty peg-holes and mortices in timber frames.
2. Information in support of applications for alterations such as early photographs, drawings, written descriptions, or other documentary information relating to a listed building’s construction or past use may be insightful. In England, some documentation may be accessible in England via the on-line archive collections of Historic England or the Enriching the List section of entries in the National Heritage List.
3. Many listed buildings have been altered to some extent to cater for the evolving requirements of succeeding occupiers and much of their interest may therefore result from the way in which the present form and layout reflects changing uses and architectural, social and economic aspirations. When contemplating alterations, as a general principle historic fabric should be conserved as found and all original architectural detailing should be respected.
4. Later additions, embellishments or re-modelings of definite quality should be also be respected as the qualities of a listed building are not necessarily diminished by later additions and minor accretions such as conservatories, porches, balconies, verandas, doorcases, bargeboards or chimneys. These may often be of intrinsic interest as part of the building's evolutionary story.
5. Generally, later features of interest should not be removed merely to restore a building to an earlier form, particularly if based on conjecture rather than evidence, however there may be cases where later work is of little significance in itself as a consequence of poor design quality and execution or have a poor physical relationship to the rest of the building and this may specifically detract from the totality of the special architectural and historic interest. A departure from the general principle may sometimes be acceptable to allow the removal of those unsympathetic alterations that disfigure or mask earlier work of greater refinement or significance but this requires clear justification.
6. As a general rule, the wholesale reinstatement of lost, destroyed or superseded elements of a building or an interior scheme is not appropriate but where the integrity of its design has largely survived, reinstatement of lost or destroyed elements might be appropriate but this should always be based on adequate evidence confirming the detailed historical authenticity of what is proposed.
7. Proposals involving the reinstatement of specific architectural features that were lost to, or deliberately superseded by, later alterations should generally be refused listed building consent as should speculative reconstructions. Such works may only be accepted in exceptional circumstanced if scrupulously documented and undertaken in an architecturally and historically correct manner in the interests of authenticity.
8. Modern extensions should not dominate the existing building either in scale, materials, situation or setting. Where it is not appropriate or practical for any extension without causing significant harm to the special interest, listed building consent should be refused. Successful extensions require a thorough understanding of the building type and sensitive handling of the detail. Alterations involving new design intended to stand alongside historic fabric needs to be very carefully managed and to be successful should respect the setting and the fundamental architectural principles of scale, height, massing and alignment, and use appropriate materials.
9. Whilst the Building Regulations quite correctly seek to ensure good standards of building construction, health, safety, energy conservation and access for the less able bodied this is principally aimed at new buildings. Early discussions with all the relevant parties are encouraged before proposals are too well advanced so that any problems that may arise in attempting to fully comply can be identified.
10. To ensure that damage to historic fabric is avoided or there is as little alteration as possible to the special interest stemming from the application of the Regulations the objective should be to make the best endeavours to comply. In England Section 1(a) of the Sustainable & Secure Buildings Act 2004 makes specific provision for relaxation of the Regulations **[4]** where strict application would be unacceptable in heritage terms in a particular case.
11. Other regulatory regimes, such as those relating to fire, public health, or discrimination against people in respect of their disabilities may also influence proposed alterations to listed buildings. All legislation has equal statutory weight and where conflicting demands arise these can only be resolved in the courts.

**EXTERIORS**

**Walls – General principles**

1. Walls comprise the main structural fabric of a listed building and alterations to wall surfaces are usually those that are most damaging to the overall appearance. Alterations to facades (that are not localized like-for-like repairs) should respect the existing fabric and materials should match in quality, colour and texture and listed building consent will usually required.
2. Proposals to render facing brickwork or stonework not previously coated should normally be refused listed building consent rendered unless this is conclusive evidence that this was the original surface.
3. Proposals to remove recently applied render because of damage to the façade or the underlying structure as a consequence of impeded moisture movement will require a balanced judgment concerning the aesthetic impact and condition of the substrate and listed building consent will usually be required in order to ensure the retention or re-use of the facing brickwork, flintwork, stonework, tile or slate hanging, mathematical tiles or weatherboarding that contributes to the special interest.
4. Earth walling, such as cob is particularly susceptible to water penetration unless carefully maintained, specialist expert advice is essential alterations are proposed listed building consent will usually be required.
5. Work involving the reinstatement of individual features or sections of a facade lost by decay or later alteration will require listed building consent and should be carried out in an architecturally and historically correct manner. Reference should always be made to the available documentary evidence in national or local archives. This may provide valuable visual evidence of a listed building’s original design, subsequent history and former appearance to inform the proposals and associated applications for consent.

**Masonry walls**

1. Where original facades have been tooled or finished in a distinctive pattern this should always be carefully respected in proposed alterations. Masonry is frequently better left untouched than poorly or inappropriately altered and where the structural integrity of individual damaged stones is in doubt it is likely that the whole stone will need to be cut out and replaced to match. As the redressing of stonework can be highly damaging to both the stone and the appearance of the building, listed building consent should always be refused.
2. Proposals for the dressing back of individual stones to a new face is rarely in appropriate or necessary and listed building consent should generally be refused. Indenting is always better than trying to dress back the whole of the façade to form a new surface.
3. In any application for proposed alterations to stonework the precise works must be properly and clearly identified to ensure the original is matched as closely as possible. This may be required as part of the application for listed building consent or made conditional on approval depending on the specific circumstances and may require the submission of samples for approval or a full specification of the proposed new stone to confirm for example, fitness of purpose regarding strength, colour, grain and durability; the coursing and tooling or surface finish; and correct bedding according to its grain.
4. Proposals to install a damp-proof course require very careful consideration. This must be fully justified and listed building consent for such work should always be required. Alternative solutions such as more efficient drainage of surface and ground water immediately adjacent to the external walls and a suitable period for drying out may obviate the need for such proposed alterations. Where rising dampness is causing specific problems such as damage to decorative finishes or timber decay, installation of a damp-proof course must be considered an alteration requiring listed building consent to ensure that the solution is both effective and visually acceptable. Useful advice regarding damp-proofing is set out in SPAB Information Sheet 6.

**Pointing**

1. Works of repointing may require listed building consent as poorly executed raking out of old mortar and repointing or the use of the wrong materials can cause physical damage to the historic fabric and radically change the appearance and future weathering characteristics and can substantially detract from the special architectural and historic interest. As the building materials of a façade should be its principal defining feature the mortar joints should invariably be visually subservient even where other decorative materials have been added, such as flint galletting. When repointing is proposed the unaltered treatment of ornamentation such as tumbled brick or stonework and patterned and polychrome brickwork is of particular importance.
2. Proposals for repointing should generally be localized and should not extend beyond the area where it is strictly necessary and where historic pointing survives intact it should be preserved not altered. Historic masonry with fine lime putty joints dating from the late 18th century onwards in ashlar work requires particularly careful treatment and all unsuitable schemes of repointing should be refused listed building consent.
3. Complete or substantial repointing of a façade is not considered to be a repair and is likely to require listed building consent. Any approval must be conditional to ensure that materials and standards of workmanship are appropriately specified and executed. The method and depth of raking out, mortar mix, colour and profile should all be properly controlled by a specification accompanying the application or by a condition of consent requiring, for example, sample panels so that any new pointing can be accurately matched to the original work in all respects. **[4]**
4. It should be a requirement of listed building consent that old mortar is cut out by hand. Mechanical cutting machinery, and angle grinders in particular should not generally be permitted. Power tools may easily cause irreversible damage to masonry, especially perpends as they are difficult to control accurately.

**External cleaning**

1. The cleaning of a listed building will generally require listed building consent as it can have a very marked effect on an individual building by altering its appearance or damaging or destroying its decorative detail and can also damage historic fabric if carelessly handled. The surface texture of the façade may be damaged by dry abrasive cleaning while wet cleaning may saturate the resulting in the migration of salts in stonework or the outbreak of rot in bonding timbers etc. Sound and succinct advice on the implications of cleaning is set out in SPAB Information Note 5.
2. Proposals also need to be considered in their wider context as the surroundings or setting of the one building among several in a group or within a unified terrace may also change the appearance of the group.
3. In considering scheme of cleaning it is essential to clearly establish that cleaning is both necessary and appropriate for the removal of corrosive soiling or to effect a major improvement in appearance. The results of cleaning may not always be those anticipated in advance and the scale and extent of irreversible damage, or fresh surface weathering or staining may only be evident upon completion or some time afterward. Where a convincing justification can be advanced, listed building consent should be conditioned to ensure specialist contractors of proven ability are used who can also demonstrate that they are capable of supervising the work properly and completing it as specified.
4. Proposals advocating abrasive systems that would partially or completely remove the outer surface of the stone or brick and potentially destroy the architectural unity and quality of the treated façade by obliterating the detailing and original surface tooling should generally be refused listed building consent.
5. Chemical cleaning will often interfere in a complex and detrimental way with the manner in which stone responds to natural weathering. Some problems in stonework will not immediately become apparent such as a high ferrous content leading to surface “rust staining”; concentrated surface deposition of other minerals; newly evident patterns of weathering and soiling, and the evidence of previously disguised plastic repairs. Listed building consent for works involving these methods should therefore normally be refused.
6. A carefully researched programme for cleaning should normally accompany an application for listed building consent to demonstrate for example the benefit of revealing previously obscured detailing of high quality and the building’s true architectural and townscape merit. Approval should be granted only to those proposals that confine the risk and possible scale of damage to an absolute minimum.
7. Phased cleaning (i.e. at different intervals) will significantly affect the architectural integrity of terraces that may result in a townscape that becomes unattractive and dis-unified and a degraded patchwork. Where there is any doubt about these cleaning issues being properly addressed listed building consent should be refused.
8. It may not be appropriate to use one cleaning method over the whole of a listed building. Parts of the structure, particularly those richly decorated, may require special treatment because of the form or type of stone, or the relative softness of the brick or surface of terracotta ornamentation. This should be addressed in an application for listed building consent as necessary before any approval is granted.
9. Where stone with a high clay or iron content is proposed to be cleaned; or where a building displays large areas of high quality architectural detail, sculpture or other decorative work; or where the surface to be cleaned forms only part of a much larger single building or group of buildings of which it is part, for example, a large terrace; applications for listed building consent for cleaning should generally be refused because of the possible overall damage to the unified architectural composition and therefore to the special architectural and historic interest.
10. Proposals involving chemical cleaning on or near ceramic detail, or where polished granite and marble have been identified it is highly likely that the surface finish may be removed. If there is any doubt about the appropriateness or extent of this cleaning, listed building consent should be refused.
11. With any building cleaned in the past that suffers from further soiling, proposals to repeat the cleaning such that would replicate or reinforce any of the visual or physical problems created by the inappropriate earlier work should not, under any circumstances, be granted listed building consent.

**Previously painted facades**

1. Rubble and rendered listed buildings may traditionally have been painted using traditional coatings and pigments that are breathable. This often contributes to local distinctiveness. Whether or not listed building consent is required for proposals for further repainting may depend on the materials used for the façade, the texture and/or lining out of the surface finish; whether the building is isolated or part of a terrace or townscape group and the general colour palette used in the immediate vicinity. Impervious masonry paints only very rarely be appropriate on listed buildings of traditional construction and then only as a result of fully authenticated justification accompanying the proposals.
2. While proposals to use of contrasting colours may occasionally enhance the townscape, their implementation on terraced facades should generally be avoided. Listed building consent may be required for redecoration and schemes for the inharmonious re-decoration of facades may well be refused as being visually damaging for detracting from the wider special architectural and historic interest. The supplementary planning guidance on suitable and unsuitable colour schemes issued by local planning authorities specific to the types of buildings in their area obviate some of the potential problems.
3. Generally, historically correct colours should be used in a manner appropriate to the building. Where more than one colour is to be used for the whole building, these should all relate to the architectural features in a logical and consistent manner. The re-painting of one storey in a different colour from another, or indeed any part of the building differently from the remainder is likely to require listed building consent and should be refused, but where there are shopfronts their colour palette should usually clearly differentiate the upper floors.
4. Many decorating materials are impermeable or have limited porosity. This can result in the entrapment of moisture in some forms of wall construction with the risk of long-term deterioration to the building fabric. Paints should therefore be porous and on rendering or harl, traditional materials such as limewash are preferable. Earth pigments can be added for colour as appropriate and should take note of local distinctiveness. Consequently, achange from permeable to impermeable decorative materials should generally be refused listed consent.

**Façades not previously painted**

1. Proposals for the painting of the previously undecorated facade of a listed building can bring about a radical change to its character an appearance and listed building consent will be therefore required. Painting of 19th century undecorated cement grey render may be appropriate but it is seldom otherwise an acceptable alternative to proper repair, cleaning or the removal of unsightly stains. A consequence of painting a previously facades undecorated facade is repainting at regular intervals.
2. Where alteration include measures to address what are known as ‘plastic’ repairs i.e. where this had previously been seen as advantageous in order to retain the highest quantity of original fabric, listed building consent for painting should usually only be given where these already cover more than half the original masonry surface and a condition of consent should requite details of the very careful preparation necessary to ensure that the paint will adhere properly. Adhere, particularly as a disadvantage is that they are less durable than if stone had been used?

**Plaster, render and harl**

1. If render or harl appears to be part of the original character of the building, or part of the character of a reconstruction or re-modeling that has given the building its final architectural form, listed building consent for its removal should normally be refused. Listed building consent can only be considered acceptable in instances where photographic evidence (or the removal of the render or harl from a small area of wall) clearly indicates it was not the intended wall finish.
2. Where the stripping of existing plaster from listed facades is proposed merely to expose rubble, brick or timber framing never previously intended to be seen, listed building consent should be refused.
3. Proposals for the re-facing of stone, flint, brick or terracotta facades with cement or roughcast render, cement-based paints or other cosmetic treatments that are difficult or impossible to remove should be refused listed building consent. This is of particular importance in circumstances where architectural or decorative features would be partially obscured or covered over.
4. In undertaking alterations, it is generally considered best practice to use traditional lime-based renders to allow natural evaporation of any moisture trapped within the wall. The softer appearance is also in contract to the distinctive hard, sharp edges to quoins and wall openings associated with cement renders. Depending on the age and architectural or vernacular characteristics of the building alternative methods and materials require detailed justification but listed building consent should usually be refused.
5. Some historic renders like stucco and Roman cement were intended to have a smooth surface finish and sharp edges in imitation of well-cut ashlar stonework. Late 18th and 19th century buildings sometimes used Roman cement to cover earlier brick or rubblework - very often where older masonry was being retained. Proposals for replacement with types of render that fail to replicate the original detailed characteristics should be refused listed building consent.
6. Stuccoed elevations of the Georgian and early Victorian periods are characterised by mock jointing, grooving, rustication, cast stone or plaster architectural elements such as cornices, architraves and keystones. These should always be retained where possible or carefully replicated. Proposals for any new lining out should match carefully to the existing demarcations and should be indicated as part of any application for listed building consent.
7. Old renders of good colour and surface quality will be expected to be retained in situ but in cases where a façade is smooth-faced in imitation of ashlar but the surface is a very dead cement-grey, it can often be effectively transformed by suitable painting. Applications for listed building consent may therefore be considered favorably as part of a carefully well-thought-out, comprehensive scheme.
8. Proposals to remove cement renders that have been applied in imitation of hammer-dressed masonry and other inappropriate modern renders should be considered favorably but listed building consent will usually be required to manage the process properly. Cement render on inter-war listed buildings is almost always an integral part of the design and consequently proposals to replace the finish with a different form of render or harl should normally be refused listed building consent.
9. If there is evidence that dry dash has been applied to an elevation which was previously wet dashed (prior to the 1930s), listed building consent may be required for the reinstatement of the original surface finish and when re-harling becomes necessary it may be appropriate to impose suitable conditions of consent to ensure that a correctly specified lime-based harl is used and that this follows the contours of the stonework backing.
10. Applications to use dry dash as a replacement for wet dash on listed buildings is never considered to be acceptable nor should it ever be brought to an even, mechanical surface and listed building consent for such work should be refused.
11. Facades exhibiting margins, whether raised, flush or chamfered, should never be harled over and proposals to do so should be refused listed building consent. These should be re-exposed where this has occurred. Where no margins exist the harl should preferably be rounded into the reveals abutting door and window frames in the traditional manner and not formed in cement margins. Applications for listed building consent for such alterations considered harmful to the special architectural and historic interest should be refused.

**Proposals to harl or render buildings not previously treated**

1. As a general rule ashlar (whether polished, droved, scabbled, broached, stugged or pinned), good coursed masonry and snecked, squared rubble was never intended to be harled. The raised margins at openings may indicate an intention to harl but this is not always a sound guide as these may simply be plain window or door architraves rather than true margins. Listed building consent for harling ashlar, coursed masonry or snecked rubble should be given only where the stone is so decayed that it represents the sole practicable method of saving the building.
2. Smooth render should be used where the original quality of the design will be better preserved. Where raised margins and string and sill courses exist they should not be altered but should always be repaired in stone as necessary and left exposed. Where there is no alternative to harling or rendering and the listed building lacks raised margins there will normally be some form of flush margin to indicate the correct proportions to be adopted and this should be indicated in any application for consent.
3. Consciously picturesque Arts and Crafts rubblework should never be rendered or harled and proposals to do so should be refused listed building consent.
4. Proposals to render or harl brickwork on listed buildings from the 18th century onward should be refused listed building consent unless there is clear and convincing evidence that it was the original intention.

**Moulded detail, sculptural decoration and inscription**

1. Carved and other sculptural details such as moulded brickwork, stonework and terracotta sculptural decoration are an important and integral part of the design and character of some listed buildings. Where there are proposals for alteration or reinstatement because such details are decaying, pre-emptive recording will be expected as part of any application.
2. Minor decay and damage may be considered to represent an acceptable patina of age but where accelerated deterioration from weathering or pollutants threatens the survival of the detail protective measures may be necessary. If these are likely to significantly change the character or appearance of the building it is likely that listed building consent will be required.
3. Commemorative or sculptured decoration or symbolic carvings, statues in niches, urns, crockets and finials, coats of arms, old lettering inscriptions, date plaques and stones, old shop signs, historic inn sign boards, monograms, fire insurance plaques and decorative patrass plates etc. all form part of the valuable historical evidence of past use and should be retained in situ. Proposals for removal of such features will require listed building consent and should generally be refused. The presumption should be in favour of retention of any such feature that might otherwise be expendable.
4. Wiring or trelliswork to support climbing plants was an integral part of the original design of some picturesque and Arts and Crafts houses and listed building consent for their removal should be refused.
5. The removal of any existing external fixture is likely to expose the holes on the façade to which it is affixed, or may affect the building’s silhouette. Fixings can occasionally be quite large and will usually be very difficult to conceal satisfactorily and this should be borne in mind when considering if listed building consent should be granted.
6. Where works would necessitate the temporary removal of decorative fixtures, listed building consent for removal should only be considered in exceptional circumstances and on condition that appropriate level of recording is conducted of the pre-existing situation and to facilitate carefully removal, secure storage (preferably on-site) and reinstatement in the former position on completion of the works.

1. It is not generally appropriate to paint previously unpainted moulded detail and sculptural decoration and any such proposals should be refused listed building consent. In the rare instances where carved decoration has been substantially lost through erosion but traces of paint survive, listed building consent to re-painting should only be given following the submission of compelling evidence based on careful analysis to enable careful redecorated in the appropriate materials and the original colours.
2. New signs and advertisements will require listed building consent. They should be carefully designed and positioned, respecting the character and special architectural interest of the building and wherever possible be appropriately fixed using the location of mortar joints to avoid damage to the historic fabric.
3. Changing the positions of the fixings of individual applied lettering on building facades can have a potentially damaging impact especially when they may be the subject of frequently replacement, for example on commercial premises. Very carefully consideration is needed where a large number of existing and/or proposed new fixings form part of an application for listed building consent. Prior to determination of the application alternatives should sought where possible to keep the number of fixings to the absolute minimum. The locating of fixings using templates to ensure accurate fixings into masonry joints should be made conditional on any approval.

**Addition of missing features**

1. The reinstatement of documented missing architectural fixtures or features is always desirable in the interests of authenticity if there is clear and compelling evidence and the work is undertaken accurately, but listed building consent is likely to be required. Listed building consent for the addition of such features on the building that were not originally present or were never intended to be present should be refused.

**Terracotta and faience facades**

1. Listed terracotta and faience facades of the 19th and early 20th century are often of high architectural quality with very fine decorative detailing. Proposals for cleaning will always require listed building consent and be accompanied by a detailed method statement. Terracotta and faience should never be painted and listed building consent to do so should be refused. White or cream glazed brick originally used to improve daylight to deep plan lightwells and rear elevations have their own historical significance and proposals for removal should normally be refused.

**Cladding in the Arts and Crafts Tradition**

1. Late 19th century and early 20th century buildings in the Arts and Crafts tradition display a wide variety of external finishes such as exposed timber framing, tile hanging, weatherboarding and rough-cast rendering. Proposals to paint hitherto unpainted woodwork or plaster over it, and alterations to replace roughcast with smooth render should be refused listed building consent.

**Corrugated iron cladding**

1. Corrugated iron as an economical building material has been available since the early 19th century and was consciously used on listed buildings as diverse as agricultural outbuildings, factories, chapels and small public halls. Exteriors were commonly painted in a limited palette of muted colours such as maroon, dark green, drab grey or black but where other paints were used, local practice should be respected. Proposals involving changes of inappropriate colour or materials will require listed building consent and should be refused.

**Cladding in synthetic materials**

1. The facing part or all of any part of a listed building in synthetic materials, such as artificial stone will be damaging to the special architectural and historic interest and be likely to inhibit moisture movement and consequently listed building consent should always be refused.

**Mass and reinforced concrete**

1. Mass concrete has been used in construction work since the early 19th century and became popular as an expressive architectural material for engineering structures such as bridges. After the Second World War the use of precast aggregate finished panels and undecorated in-situ board-marked concrete became more commonplace. As seamless repairs to concrete are very difficult to achieve, particularly those stemming from the corrosion of steel reinforcement located close to the surface, remedial works are generally likely to result in a change of appearance. Where the character and appearance of the listed building or structure is likely to be affected, such works will almost always constitute and alteration and listed building consent may be required.

**Uncommonly encountered forms of construction**

1. Some buildings have been listed principally for the specific and uncommon techniques and materials used in their construction. Some will have arisen from patented industrialized methods and others from vernacular traditions. Examples of the former may include the use of modular structures, while examples of the latter might include the use of turf or heather roofing as found on agricultural buildings and some exemplars are now rare and friable structures are especially vulnerable to decay or collapse. Considerable forethought is therefore needed regarding any proposed alterations.
2. As the special architectural and historic interest lies principally in the original means of construction, listed building consent for alterations should normally be refused where the works would be substantial and would result in a change to the character and appearance. Under such circumstances, conservative like-for-like repair would be a more appropriate solution.

**Rebuilding**

1. A defining principle of conservation should be to repair rather than to rebuild an existing structure wherever possible. Applications for listed building consent to take down and rebuild any part of a listed building should always be supported by clear evidence such as a structural report that convincingly explains why repair is not a viable option and what other avenues have been explored.
2. Where the proposed works would be likely to result in the original detailing not being accurately replicated: walls thinned; details reduced in scale or simplified; windows and doors insufficiently recessed into walls and fixtures such as shutters and shutter-boxes omitted; chimney stacks reduced in height and pots omitted; the outcome would be an inauthentic, poor representation of the original and might contrast unfavorably with similar neighbouring listed buildings. Such proposals of this nature for listed building consent should be refused.
3. Where it can clearly be demonstrated that there is no alternative other than to take down an external wall, backed by unambiguous and informed structural engineering advice - and particularly where this forms all or part of a principal elevation, listed building consent will be required. The precise extent of the work must be clearly defined by a condition of the consent requiring re-incorporation of as much of the original material as practicable and be rebuilt exactly as before.
4. Where appropriate, proposals for partial rebuilding works should be made the subject of a carefully worded condition of listed building consent so that the fabric involved is recorded prior to commencement, carefully dismantled and numbered (using indelible tags or other markers that can may be easily removed without damage upon rebuilding). This will ensure that reconstructed stonework, brickwork, timber-framing or decorative plasterwork and paneling and any associated detailing will closely match the original work.
5. Where alteration or rebuilding of historic shopfronts is proposed (whether referred to in the statutory list description or not) and particularly where good original detail survives, listed building consent will be required. When the shopfront element forms part of a larger scheme of refurbishment, the detailed design should be agreed as part of the overall scheme but deferring the approval of listed building consent to a later date should generally be discouraged.

**Openings – general principles**

1. As a general rule, original doors and windows should be retained and proposals for replacement may be required and should only granted where evidence has been submitted as part of the application to show they are demonstrable beyond repair. A further consideration will be where a number of openings would be involved with resultant cumulative impact on the character and appearance. Listed building consent should only be granted on condition that the replacements proposed match the originals in every respect.
2. Proposals to change original proportions of doorways, and window openings - particularly those with bipartite or tripartite window mullions - would severely compromise the architectural integrity of the building and listed building consent should therefore be refused.
3. Windows and doorways generally also have different proportions and listed building consent to convert the former into the latter should be refused. Buildings with no obvious means of access from the street invariably look incorrect, particularly in terraces and therefore redundant doorways should generally be retained in-situ and listed building consent to block up their external faces should be refused.
4. Listed building consent for the introduction of additional windows in original symmetrical or well balanced elevations, or alterations that would result in a departure from the accurate replication of the original sill and lintel details of windows and the threshold detailing of doors should be refused.

**Doors**

1. Original doorways and any surviving joinery should normally be retained but where it is adequately demonstrated that this not possible a convincing case must be made for replacement and listed building consent is likely to be required unless an exact replication is undertaken. A condition of consent should ensure that the replacement is appropriate to the character and appearance of the building and properly located in relation to the listed façade.
2. Where proposals would be likely to resulting in the loss of original detailing including: letterboxes and knockers; or the removal of fanlights, pediments, columns, pilasters, cornices, consoles and carved or stucco moulded details; or foot scrapers, listed building consent should be refused.
3. Where front doors are to be retained but the openings blocked internally, listed building consent should be conditional on the fanlight not being obscured and the door furniture retained but made inoperable.
4. Modern off-the-peg doors are not generally acceptable for use in listed buildings, nor are doors with incongruous design features such as integral fanlights or incorporating asymmetrical elements and proposal for their introduction should always be refused listed building consent. Inappropriate modern door fittings may also require listed building consent but reinstatement of such items of the appropriate period should be encouraged.
5. Unpainted hardwood or stained or varnished softwood doors are rarely suitable and listed building consent should also be refused.

**Windows**

1. Proposals to replace original sashes and their glazing and fittings, especially those where early plain crown, cylinder or early polished plate glass survives, should be refused listed building consent unless compelling evidence is submitted as part of the application that repair is not possible and that the historic glass cannot also be retained or recovered and reused. Any listed building consent grated should be conditional on all old glass being protected and where external protection for glass is required, it should be as unobtrusive as possible and conditioned to be reversible.
2. Listed building consent to reinstate windows should only granted where they are also be fitted to the same depth of the reveal, are constructed from timber sections of the same profile and dimensions, and have the meeting rails in the same position.
3. Top-hung mock sash and casement windows are damaging to the special architectural and historic interest and strike a discordant appearance when fixed open and listed building consent for this type of fenestration should be refused.
4. Listed building consent for proposals for replacement windows with applied glazing bars to the surface of or sandwiched between panes of double-glazing should always be refused.
5. Listed building consent for proposals to install glazing bars in windows that do not have, and never had these, with a view to “improving” the character and appearance of the listed building should generally be refused.
6. Proposals to double-glaze existing sashes should generally be refused listed building consent but secondary glazing may be acceptable subject to careful location of the framing elements so as not to be disruptive to the visual appearance when seen from the exterior.
7. Casement windows that open inward are a relative rarity. Proposals for their replacement should therefore be a precise replication and should be the subject of conditional listed building consent to ensure this authenticity is maintained.
8. Casements framed in metal are more commonly found and include those incorporating geometric patterned glazing and leaded lights. These may be the most distinctive feature of the building, particularly designed by a member of the Arts and Crafts movement. Proposals to replace these window patterns with plain glass or any other form of glazing should be refused listed building consent.

**Dummy and blocked windows**

1. Dummy and blocked windows may be an integral part of the architectural composition and listed building consent for re-opening should only permitted where this clear evidence that this was the original intended elevational treatment but not where the blocking up took place as a documented consequence of either: the Window Tax (1696-1851); during alterations to the structure; where the earlier window openings consequently no longer relate to the present elevational treatment; or where later interior work of quality would be disturbed.

**Stained glass, decorative zinc-framing and leaded glazing**

1. Listed buildings dating from the latter part of the 19th century and early part of the 20th used stained glass or decorative zinc-framed or leaded glass in doors, fanlights and windows, often an original feature. Proposals for their removal or alteration will require clear justification and listed building consent will be required.
2. Proposal involving later embellishments to buildings of earlier date may now be considered incongruous with the original design. Listed building consent for removal will require careful consideration of the aesthetic qualities and condition of what exists. Proposals for the removal of decorative glazing and the alteration of framing materials and profiles, from churches and chapels not covered by the ecclesiastical exemption will also require listed building consent.

1. Zinc framed glazing and lead framing appear superficially similar with the former creating more sharply defined patterns than the latter. This is invariably part of the special character of the listed building. Proposals to replace zinc with leaded or other more modern forms of diamond paned glass, and removal of stained glass of particular artistic merit as found in some non-denominal churches, should be refused listed building consent.

**Industrial windows**

1. Industrial listed buildings feature a wide variety of window types, often related closely to their age and function and are frequently their most distinctive feature. While some windows, for example the perforated metal panel and louvered openings in tanneries and agricultural buildings, present obvious difficulties where alterations and a change of use may be proposed, the original window type and form should be respected wherever practicable. Where this is not possible listed building consent should be conditional on the glazing pattern at least being accurately replicated.
2. Re-fenestration resulting in a revised glazing pattern was quite a common occurrence after 1945 but archival photographs may enable the original pattern to be established. Proposals for the replacement of surviving original horizontally pivoted and metal-framed windows should be accompanied by supporting evidence about the building’s history as these may be original and early examples of their kind, listed building consent for such alterations may be refused.
3. The manner in which a window opens is often as important as its appearance. There may be several different types of window within a single building reflecting the different amounts of natural light and ventilation required in different rooms or on different floors according to, for example, the industrial processes being undertaken. Such variations contribute greatly to the interest of the building and consequently proposals to vary the fenestration arrangement are likely to require listed building consent.

**Early modern metal windows**

1. Large commercial premises and public buildings from the mid 1890’s began to incorporate galvanised metal-framed casement window. Surviving early examples are scarce and are usually located on rear elevations or to internal lightwells and consequently have important scarcity value. Listed building consent may therefore be required for their removal.
2. From the 1920s, the Art Deco and Modern Movements in architecture popularized steel-framed windows with their characteristic long, horizontally proportioned panes. These were adopted in a wide range of listed building types including houses, public, commercial and industrial buildings. Proposals for their replacement with units exhibiting a different glazing pattern, profile, section and method of opening or made from a different material are likely to alter the character and appearance and listed building consent will be required.
3. Applications for alterations to a different material because of cost considerations or presumed better durability are likely to require listed building consent and this will need to be convincingly evidenced. Such alterations are only be likely to be acceptable in exceptional circumstances and where the exact replication of the original window is not considered to be of critical importance to the special architectural and historic interest. Any such permitted variations in form, profile, section and method of opening should be kept to the absolute minimum and should be subject to a condition of consent.

**Door and window fixtures**

1. It is uncommon for proposals to be made for alterations involving the removal of external fixtures such as boot scrapers, cast-iron or wrought iron balconies, glass canopies and side screens but generally where applications are made, listed building consent should normally be refused. Similarly where rare instances of external wooden shop window shutters (particularly those from the 18th century survive) listed building consent for removal or alteration should be refused and the joinery should be retained and where necessary repaired.
2. Windows of some late Georgian houses were provided with external blinds but these are now a rarity and those blind awnings or boxes that survive should always be retained and listed building consent for their removal should normally be refused.
3. Reinstatement of external blinds in a historically correct form are likely to require listed building consent where there is convincing evidence of their prior existence, but should be encouraged for their visual interest, passive solar energy management, and the protection of historic internal finishes, but listed building consent should be refused for external blinds where there is no evidence that these previously existed.

**Modern forms of window and glazing**

1. The appearance and character of a listed building will greatly depend on the design and detailing of its walls and its windows. Any alteration to the form of the latter is likely to have a considerable impact upon the overall appearance of the building as a whole, and consequently such alterations will always require listed building consent.
2. Historically and architecturally incorrect installation of modern units made from a different material, to a different design and/or with a different method of opening is likely to be highly damaging to the special architectural and historic interest and a diminution of architectural quality and listed building consent should always be refused.
3. Where the condition of a traditional timber sash or casement window is such that it has to be replaced, proposals must be accompanied by clear evidence to demonstrate that the replacement will match the original unit exactly in all respects. Any departure in design and detail is likely to require listed building consent, particularly for windows on principal elevations.

**Eyebolts**

1. Where eyebolts are proposed in connection with window cleaning, every effort should always be made to locate them internally (for example in the floor stricture below the window) but where external fixings are only practical externally placement needs to be as inconspicuously as possible, particularly on principal elevations and listed building consent may be required where bolts may otherwise detract from the appearance of the building. Consent may also need to be conditional to ensure the exact location of the bolts cause minimal damage to existing surface finishes, and under all circumstances avoid any significant item of external architectural detail or decoration.

**Shopfronts and commercial frontages**

1. Good examples of unaltered Georgian, Victorian, Edwardian and inter-war shopfronts are now a rarity although many others have often retained individual elements such as the pilasters, capitals, console brackets, entablatures or cast-iron columns that form the ‘framing’ of the shop unit. Listed building consent for the removal of good original examples of shopfront components in stone, timber, tile, iron or toughened glass (such as “Vitrolite”) or other early 20th century proprietary materials should be refused.
2. Retention of a historic shopfront rarely affects the trading activities and the surviving physical evidence or archival material may often enable appropriate restoration or reinstatement of the parts that are missing. Alterations to these ‘framing’ elements that would result in their loss would require listed building consent and should therefore be refused but authentic restoration or reinstatements should be encouragesd.
3. Where later over-cladding may have hidden earlier historic detailing it may be appropriate to grant conditional listed building consent to enable investigation of the underlying fabric to facilitate the possibility of proper reinstatements where such undisturbed features are uncovered.
4. Tile-work and terrazzo was often originally installed to improve the cleanliness of premises such as fishmongers, butchers and dairies. These sometimes incorporated high quality decorative tiling scenes illustrative or emblematic of the fresh food products being sold. Such original shop exteriors and interiors and their associated fixtures are now generally rare and consequently, proposed alterations will require very careful consideration and will always require listed building consent.
5. Good early lettering on fascias, windows and doors, good original symbolic examples of trade emblems such as chemists’ mortars, fishmongers’ carved wooden fish, or boots for shoe shops are now becoming rare. To ensure their retention, listed building consent for their proposed removal should be refused.
6. New lettering on traditional shopfront should always be carefully designed to respect the character of the building and may require listed building consent depending on character and extent. Traditional designs should be encouraged, as should hand-painted lettering by sign-writers. New signage above shop fascia level may require listed building consent but will rarely be appropriate.
7. Traditional external sun blinds (or awnings) over shop windows were important to protected displays from direct full sunlight for several hours a day particularly perishable goods. New blinds proposed to be incorporated above traditional shop fascias that would mask or cut through or across existing architectural detailing should be refused listed building consent with consideration given to alternatives such as the installation of internal filter blinds or glazing that cuts down the transmission of U.V. light. Blinds introduced solely for adverting purposes, such those sought on north facing elevations, are not appropriate and listed building consent should generally be refused.
8. Modern “canopy” blinds on listed buildings are not a traditional feature in the street scene, generally detract from the special architectural and historic interest and listed building consent should generally be refused.

**Signage**

1. New signs can have a major impact upon the appearance, and thus the character of a listed building and generally listed building consent will therefore be required. Signage should be appropriate to the architectural form and detailing of the particular building to which this will be attached. Where proposals would overlay any architectural or structural divisions in the building (or between one building and another) or would obscure, overlap or cut into any architectural detailing listed building consent should be refused.
2. Proposals for signage should respect the age and architectural style and a careful choice of materials, colour and lettering will be required. When considering applications for listed building consent, the standard colours and lettering used by major national retailers may not be appropriate in all circumstances, however corporate signage guidance should usually be flexible enough to accommodate the architectural features of listed buildings not the other way round.
3. New projecting signs are rarely essential where there is an existing fascia sign, but in all instances listed building consent should be requires to ensure that the size, materials and design is appropriately controlled.
4. Where most appropriate to the character of the building, a sign-written timber board or a brass plate may prove the most acceptable solution and listed building consent may be required depending on the specific circumstances.

**Shopfront security**

1. The deterrence of shop break-ins, theft of stock and vandalism to shop windows require appropriate counter-measures. Externally mounted retractable roller shutters housed in large box above and constrained by substantial side channels will have a deleterious visual impact on the special architectural and historic interest and listed building consent should be refused unless exception circumstances are fully justified and it can be demonstrated that no alternative solutions are possible such as laminated or toughened anti-bandit safety glass, subdivision of shopfront glass into smaller units or the used of internal retractable (open) grilles or a combination of measures.

**New shop fronts**

1. Standard modern corporate shop fronts are seldom appropriate for historic buildings, nor generally are internally illuminated fascia boxes or signs, particularly on listed buildings of the pre-Victorian era and listed building consent should generally be refused.
2. Applications for listed building consent for shopfronts that straddle different parts of the same building (or more unsatisfactorily two separate buildings) without acknowledging the special architectural characteristics and structural divisions of the floors above should be refused.
3. As many commercial and office uses do not require display windows or other alteration to a ground floor frontage, alteration to existing openings should be fully justified in historic building terms and listed building consent should be strictly limited to the minimum extent required.
4. To ensure that under- or un-occupied upper floors of listed buildings are capable of beneficial use and to facilitate maintenance and prevent neglect, listed building consent to extend shopfronts across the original external access doorways providing the main access to upper floors should only be granted in exceptional circumstance and only if a satisfactory alternative means of upper floor access can be provided without extensive alteration to historic fabric elsewhere.

**External drainage and plumbing**

1. External rainwater pipework can be an integral part of the overall architectural composition, notably where lead or cast-iron hopper heads, down pipes and decorative fixing brackets, particularly of the Victorian and Edwardian eras survive intact. Wherever possible these fixtures should be retains but listed building consent for replacements that do not precisely match the originals in all respects should always be refused.
2. Proposals for the use of external plastic pipework should generally be refused listed building consent as the material becomes easily embrittled (particularly in coastal locations) and is susceptible to damage caused by pressure from ladders, freeze-thaw action, vandalism, and is unsatisfactory in appearance.
3. Listed building consent for the use of cast-aluminium may be acceptable in those instances where an original cast-iron profile is no longer readily available and the new fittings will provide a good match.
4. Some external plumbing may of long-standing and date from, for example a change of use, and may pay little or no regard for the architectural proportions and divisions of the building. Where new external plumbing is proposed, and where appropriate, the granting of conditional listed building consent may present an opportunity to facilitate the removal or rationalization of any existing inappropriate pipework.
5. Proposals involving the formation of kitchens or bathrooms to the front elevations of listed buildings should generally refused listed building consent unless the soil and waste pipes can be satisfactorily accommodated internally without damage to significant historic fabric. Proposals for pipework cutting across or through architectural features such as cornices and stringcourses should always be refused listed building consent.
6. When a listed building is proposed to be subdivided into a number of smaller units, the introduction and visual impact of external venting of internal soil and waste stacks through roofs needs careful consideration as these can detract significantly from the external appearance. Listed building consent should therefore not normally be given for vents on front slopes but vents may be supported if located discretely elsewhere.
7. Original lead rainwater goods should not be painted and applications for listed building consent to do so should be refused. The painting of cast-iron downpipes on main elevations to match the wall surface should generally be encouraged but the normal practice of painting ornamental cast-iron rainwater goods a contrasting (usually dark) colour should usually be followed.

**External flues**

1. An external flue on the front elevation of a listed building (including a balanced flue) will never be acceptable and listed building consent should be refused. It may be possible for this to be accommodated on a rear elevation depending on the quality of the facade and the wider setting but this will always require very careful consideration. To minimise the visual impact, listed building consent should only be granted where construction is from a material with a non-reflective surface finish and/or camouflaged by being painted to match the associated façade.
2. Whenever an application for change of use arises it should be axiomatic to question whether an external flue is necessary, where it could otherwise be located and to deal with the corresponding listed building application accordingly. If existing internal flues cannot be used and no acceptable location for an external flue can be found, the change of use application and listed building application should both be refused.

**Porches, verandahs and conservatories**

1. These important original features of many buildings of the late Georgian, Victorian and Edwardian eras are often early additions, are frequently of significant merit and are becoming a rarity. Listed building consent for their removal should generally be refused but where difficult problems of maintenance arise, applications for their demolition should only be considered in exceptional circumstances when all other avenues for retention and repair have been explored and exhausted.
2. Some later porches and conservatories of intrinsic merit may occasionally enclose or occlude earlier architectural features of a higher quality and/or greater significance or they may detract from the form of the original building. Listed building consent for removal will therefore require very careful consideration.
3. Some porches originally designed as open structures have received later glazing of significant merit, and while there may be some environmental benefit to proposals to build up or glaze in open porches this should generally be discouraged and other ways of improving energy performance explored. Where listed building consent proposes alterations to restore the original open arrangement, this should be encouraged where the enclosure is otherwise without visual merit.
4. Where a new porch, verandah or conservatory is proposed, great care must always be taken to ensure that the architectural character, scale, materials and detailing of the proposal are appropriate to the architectural form and detailing of the listed building and to the location. Where proposals will detract from the special architectural and historic interest of the building as a whole listed building consent should be refused.
5. Generally a new conservatory is unlikely to be acceptable on any principal facade of a listed building however well concealed it might be within its own grounds and listed building consent in such locations should generally be refused. The architectural quality and integrity of the exterior or interior may not make the construction of a new conservatory on any elevation acceptable and a well located free-standing conservatory or one built against a garden wall may be a more appropriate alternative.

**Wrought and cast iron**

1. The character of wrought iron fittings such as, railings and lamp-brackets derives from the unique qualities of the metal and traditional smithing techniques. Wrought iron is now very difficult to obtain and proposals to replace serviceable old ironwork should be refused listed building consent. Where a clearly justified case is made that this is not possible, closely matching copies in mild steel with close attention to matching the sizes of the original components may be acceptable.
2. Historic fixtures and structural components in cast-iron, including railings, balconies, structural beams and columns can be of visual and decorative as well as functional significance and may carry the name of the foundry and date of casting, thereby adding to the historic interest. As such components cannot generally be altered but may be repairable by cold stitching, proposals for replacement by other materials will require listed building consent and will require convincing justification. Replacement on the basis of fire protection requirements alone will rarely be acceptable.

**Roofs – general principles**

1. A building derives much of its character and profile from its roof. Proposals for alteration should respect what survives it its original form and any later positive evolutionary changes of definite quality should also be retained and not altered.
2. Proposals for the removal of unsympathetic past alterations such as an ill-portioned mansard or additional floor will usually require listed building consent and should be encouraged but this should always be based upon firm evidence of the original state of the roofs, and any associated features such as parapets, dormers and chimneys, etc. Photographic records and plans in national or local archives may provide the necessary evidence in support of the relevant application.

**Early roof structures**

1. Intact unaltered early roof structures are relatively rare and need special consideration. Their age will not usually be apparent externally except by signs of long-standing natural deformation. Roof structures of some mediaeval buildings and later vernacular agricultural buildings will be visible internally. Proposals for alteration will almost always require the impact of the alterations on the age, significance, rarity and complexity of the timbers to be assessed from within the roof and form part of the submission for listed building consent. Machine sawn timbers will be absent in some cases and the roof carpentry may display the pre-assembly marks made prior to its erection.
2. Listed building consent for alterations to early carpentry should only be granted in exceptional circumstances where it cannot retained in-situ and repaired using traditional carpentry techniques. The introduction of modern materials such as steelwork for structural support or restraint must to be fully justified as part of any application and should only be approved where traditional methods would involve undue disturbance to the historic structure.

**Later roof structures of historic interest**

1. Roofs of industrial, commercial and transport buildings of the 19th century often displayed daring feats of structural ingenuity and elegance as they became larger and functionally more specialized. Wrought- and cast-iron were introduced for additional strength and longer spans. Structures using rolled iron angle became more common from the 1860s and mild steel from the 1880’s and any roof of a listed building from the early 19th century or later may be of structural interest.
2. Proposals for structural alteration to large span roofs will require listed building consent and will only be acceptable with a clear and convincing structural engineering justification. Such roofs are rarely capable of the kind of localized alterations that characterised the early vernacular tradition.

**Roofs - height and pitch**

1. Listed building consent to alter original roof forms and pitches should generally be discouraged unless there is a pre-existing rainwater drainage problem, even where they are completely concealed behind parapets. Where proposals entail steepening or altering the pitch of a roof to form a mansard in order to increase the floorspace within the building, listed building consent should normally be refused.
2. Proposals to raise parapets or wall heads on buildings will undermine the original proportions and listed building consent should be generally refused. Where roofs have to be completely replaced, alterations to the profile and detailing of any features which add to its character and special interest such as ogees and bell cotes will require listed building consent.

**Associated masonry details**

1. Buildings can derive much of their special architectural interest from crow-steps, eaves cornices, parapets and balustrades, gargoyles, waterspouts and other associated ornamentation. Listed building consent should always be refused for their removal. If such details have been lost or badly repaired or replaced, listed building consent will be required for their accurate restoration, should be positively encouraged but made conditional on the new work matching the original in every respect.
2. The use of lead for up-stands, the upper surfaces of cornices and weathered parapets requires careful consideration to minimise the appearance on the facade of a dark line where none was originally intended and consequently listed building consent may be required.
3. Proposals for the leading of crow-steps and skews should generally be resisted. Leadwork surface coverings of facades will inevitably change the character of these features and as this may radically affect the appearance of the building, listed building consent will require careful consideration.

**Chimneystacks**

1. Chimneystacks contribute greatly to the interest of the roofscape and the silhouette of the building. In many instances they are an integral part of a formal architectural design. Listed building consent for their removal or truncation should be refused regardless of whether the flues are in use or not, and this should apply whether the chimneystacks are on elevations not normally seen from the public realm, such as those facing rear or enclosed yards and/or unless such locations have completely lost their original character.
2. Proposals for the complete demolition of chimneystacks should be wholly exceptional and listed building consent should only be given where a clearly justified structural engineering case has been advanced relating to the stability of the building.
3. Where proper evidence exists, listed building consent for the reinstatement of truncated stacks should be encouraged by condition so as to ensure that the original form and profile of the cornice and coping are accurately reproduced.
4. Brick chimneystacks above stone facades may contribute to the to the overall architectural quality of the building may in fact be original in those where the local stone is susceptible to damage by flue gases or is particularly difficult to work. Proposals to reinstate stone chimneystacks therefore require careful consideration and listed building consent for alteration may not be appropriate.

**Chimneypots**

1. Pots come in a wide variety of forms and a typology by Rev. Valentine Fletcher (1914-1993) in 1969 identified nearly 450 different designs of varying degrees of elaboration and ornamentation. Where chimneystacks later than the mid 18th century are to be altered and have pots these should be retained even if the flues are no linger is use and the flues themselves should never be totally sealed.
2. Where matching second hand pots cannot be found or replacements of the more specialised types present difficulties, listed building consent may be required to vary the arrangement and type and local design precedents should be followed where possible.

**Slate roofs**

1. Alterations leading to a change of appearance will normally require listed building consent particularly as some natural roofing materials are no longer quarried or supplies of suitable second-hand material are in short supply. Where proposals would involve the use of imported materials departing from natural slate from the original geological source that would result in the substitution of, for example Welsh, Westmorland, Delabole or natural stone slates (such as Cotswold, Collyweston or Caithness etc), listed building consent should be refused.
2. Where it is proposed to a change the sizing or laying pattern including those of random width or courses laid in diminishing sizes from the ridge, or where it is proposed to dispense with distinctive decorative patterns of banding by colour and/or by shape, for example by the use of fish-scale or diamond shaped slates, listed building consent should usually be refused. Also, where it is proposed to depart from such characteristics on the roof of an individual property within a terrace displaying these decorative characteristics, listed building consent should always be refused.
3. Where supplies of salvaged slate are inadequate to repair the whole roof and the shortfall cannot be found from suitable second-hand sources it may be acceptable to concentrate the salvaged material on more conspicuous areas of roof and to consider granting listed building consent for new slates in concealed or less conspicuous areas subject to conditions regarding the matching of colour, thickness and surface texture to the original material.
4. Proposals for replacement slates of the wrong size, colour or thickness on a prominent roof slope or the mixing of concrete tiles or artificial slate would result in a very marked deleterious change to the special interest of the whole building and listed building consent should always be refused.

**Pantiles**

1. Roofing in pantiles is often a valuable physical expression of local distinctiveness and tiles are likely originally to have been locally sourced. Proposals to replace pantiles with slates or other coverings would detract from the special architectural and historic interest and listed building consent should generally be refused unless supported by convincing evidence that the roof was originally covered by a different material.
2. Alterations involving variations to the profile, colour and surface sheen, including black glazed examples in particular, and changes to the eaves course details should generally be refused listed building consent, as should the substitution of pantiles by concrete tiles or interlocking French or Roman tiles.

**Rosemary tiles**

1. Many listed buildings of the late 19th and early 20th century from the Arts and Crafts movement used proprietary flat machine-pressed Rosemary tiles. While the colour and texture of these tiles are an essential part of their appearance, in many instances issues surrounding the original method of manufacture has led eventually led to snapping or delamination as the result of frost action.
2. Generally proposals for the alteration to a different form of plain tile or with a marked change of surface character, shape and texture will require listed building consent and is unlikely to be acceptable. The substitution of Rosemary tiles with other forms of tiling, even if of similar colour, or with slates should be refused listed building consent.

**Valleys and ridges etc.**

1. Alterations to characteristic feature of vernacular roofs such as swept valleys may require listed building consent and proposals to replace these with lead or zinc flashings will significantly alter the appearance and should be refused.
2. In later roofs the lead or zinc flashing details may be an original feature and should not be altered without listed building consent particularly where these incorporate ornamentation. Proposals to remove cast- or wrought-iron finials and brattishing, original terracotta ridges and finials on Victorian and later roofs should be refused listed building consent.

**Thatch**

1. Thatched buildings are a vulnerable type derived from the nature of the material used and this is an important consideration if alterations to the covering are proposed. Long straw, combed wheat reed and water reed are the main thatching materials found in lowland Britain, but rushes, heather and marram grass have been used in remote upland areas depending upon local availability.
2. The materials are processed in different ways and differ in their on-site preparation, laying, and finished appearance. A change from one thatching material to another or from thatch to another material entirely will have a detrimental impact on the appearance of the building and thus of its setting and local distinctiveness and will require listed building consent. Where it considered that this would harm the building’s authenticity, significance and appearance, listed building consent should be refused.
3. Ridges, stitching and the treatment of dormers are closely related to the nature of the thatching materials used. Significant departures from clearly recognisable local thatching traditions will require careful consideration and will generally require listed building consent. Decorative treatments likely to be contrary to local vernacular traditions are also likely to require listed building consent as a consequence of their scarcity and importance.
4. Proposals for the alterations to thatched coverings of Picturesque architect designed buildings of the later 18th and early 19th century and those of the early 20th century Arts and Crafts Movement are also likely to require listed building consent.
5. Where a thatched roof has been later covered in sheet metal such as corrugated iron or re-thatching has been done using the wrong method or materials in relation to local distinctiveness or tradition, listed building consent to reinstate the thatch will normally be required but should be treated favorably.

**Bargeboards**

1. For many buildings, particularly of the mid-Victorian era, shaped and punctuated bargeboards are a distinctive decorative roofing characteristic. Proposals involving alterations resulting in the removal of decorative bargeboards or their replacement with conventional plain fascia boarding joinery should be refused listed building consent.

**Other roof decoration**

1. Domes clad in lead or copper, cupolas, finials, crestings, fleches and ventilators are often an integral part of the overall architectural design, form part of the special interest and often contribute to the skyline and silhouette.
2. Proposals for the replacement of lead or copper roofs with cheaper materials will need careful consideration particularly with regard to longevity and is likely to be detrimental to the appearance and listed building consent will be required. Proposals to remove these features should generally be refused listed building consent.

**Dormers, skylights and rooflights**

1. Dormers come in a very wide range of sizes and architectural forms and as they are important to the distinctive character of listed buildings. They should generally be retained and proposals for their removal should be refused listed building consent.
2. Proposals to alter any original dormers particularly by larger modern examples require particularly careful consideration but should generally be discouraged.
3. Where appropriate evidence exists concerning the form of original dormers on the listed building, proposals for reinstatements that are historically correct both in scale and detail will require listed building consent but should generally be encouraged.
4. New dormers will require listed building consent but may be more favorably considered on rear or subsidiary elevations than on principal elevations, however the size, placement and cladding materials will all require careful consideration.
5. Rooflights may form a significant element of the roofing design of buildings from the late Georgian period onward where they may be more important for their function in lighting the interior spaces below than for their external appearance.
6. Where the proposals involve the removal of traditional cast-iron rooflights listed building consent should generally be refused, but where a convincing case can be advanced that replacement is essential as a consequence of poor repair; new cast-iron units should be the subject of listed building consent to ensure the sizes, form and positioning are correct.
7. Proposals for additional rooflights require very careful consideration and should be strictly limited in number and to the minimum sizes necessary and generally installed in inconspicuous positions. Listed building consent should be conditional on ensuring the minimum necessary alterations to historic fabric, adopting the size most appropriate to be fitted within the existing roof structure where necessary.
8. Rooflights manufactured from materials other than cast-iron stand and those that stand well proud of the adjacent roof surface will seldom be acceptable, especially on principal elevations and listed building consent should generally be refused.
9. Proposals for rooflights on the same roof slope made from different materials proposed are never acceptable and listed building consent should always be refused.

**Solar panels**

1. Climate change is becoming an ever increasingly urgent priority as is making historic buildings more sustainable in reducing their energy consumption. Solar panels can make a mitigating contribution but may seriously disfigure a building and greatly diminish its architectural quality. Proposals for the installation of solar electric (photovoltaic) and solar hot water panels and similar installations will require listed building consent.
2. Solar panel may be more easily accommodated on larger buildings and those with complex roof slopes where installation might be less conspicuous situated within valleys, but location on principal elevations should generally be refused listed building consent unless there are parapets and/or the roofs are low-pitched and completely obscured from ground level where the test in the Burroughs Day v. Bristol CC High Court judgment [1996] should be applied.
3. Proposals for panels on hidden inner roof slopes and flat roofs are likely to require listed building consent but should be made conditional to ensure control over cable routing and fixings to enable the installation to be reversible at a future date.
4. Flat roofs and may be able to accommodate the equipment unobtrusively but location on less conspicuous outbuildings may be an acceptable alternative.
5. Satellite dishes and other modern IT antennae generally disrupt the profile or silhouette of a listed building and should generally be located below roof level and certainly below ridge level. Listed building consent should only be granted in undamaging and visually unobtrusive positions and a condition of consent may be necessary to address the suitable routing of the associated cabling.

**Floodlighting**

1. Proposals for floodlighting will require careful consideration as the ability of a listed building to accommodate the fittings will greatly vary. Those facades with little architectural relief will provide much less scope for concealment of fittings than heavily modeled elevations. Fittings that provide effective floodlighting at night may seriously disfigure a façade by day. Where proposals will significantly detract from the daytime appearance of the building, listed building consent should be refused.
2. Where floodlighting proposals are deemed to be acceptable. A temporary lighting test should always be undertaken prior to approval and permanent installation and listed building consent should ensure that the size of the proposed fittings are appropriate and can be located unobtrusively. Consent may also be made conditional to manage unobtrusive cable runs and/or the painting of fittings to match the colour of the façade - but this should never be to ameliorate problems created by bad siting.
3. Where suitable fixing positions on the listed building cannot be found consent should ne refused and alternatives sought that might involve lighting from ground level or from other (unlisted) buildings.

**Fire escapes**

1. Proposals for external escapes can be very damaging to the appearance of a building and will require listed building consent. Where, in the interest of ensuring adequate fire protection and means of an escape, no other alternative mechanism requiring less physical alteration is possible, consent should only be granted conditionally in an inconspicuous location and fixed so as to avoid rust or other staining of the wall surfaces.

**Other external fixtures, meter boxes etc.**

1. The impact of some commonplace external fixtures on the character of a listed building is often under-regarded but may require listed building consent depending on size, colour and siting. These include meter boxes, burglar alarms, security lighting, stair lighting sensors, fixed and maneuverable video cameras, external central heating and other flues (both standard and balanced) and gas supply pipework.
2. Ill-considered proposals for the location of any one of these fixtures or several in combination, particularly on principal facades and on smaller buildings, can have a particularly deleterious impact on the special interest. Listed building consent should therefore be requires to ensure that only undamaging and visually unobtrusive positions for such fixtures are agreed and not cause damage to existing surface finishes, and under all circumstances to avoid any significant item of external architectural detail or decoration.

**Pest control**

1. Roosting and nesting birds can give rise to major problems of surface soiling and potential decay to historic fabric, particularly those with prominent architectural or sculptural detail but proofing such buildings can have a deleterious impact on the special architectural interest and such measures may therefore require listed building consent.
2. Not all methods of discouragement are completely successful. Spikes on un-modeled horizontal surfaces are often visually obtrusive and gels have a limited life that can discolor and cause surface staining. Sprung stainless steel wires fixed with epoxy onto the surface of the masonry (not drilled except in masonry joints) upon which birds cannot perch although relatively unobtrusive meet with limited success as failure of the spring tensioning often allows roosting to resume. Wires are only effective if regularly maintained to remove debris and regular servicing is therefore essential if proposals for installation are being advocated.
3. Mist netting, particularly across the facades of larger buildings can be relatively unobtrusive but require listed building consent. Netting drafted over skyline projections, statues, urns, chimneystacks, finials etc. usually have a deleterious visual impact and generally listed building consent for draping mist netting in this way should be refused listed building consent.
4. Any proposals for the use of chicken wire, which is visually intrusive and easily traps debris that can lead to the blockage of drainage outlets etc. should be refused listed building consent.
5. As a general rule, proposals for the installation of a system that would materially detract from the character or quality of a facade or cause possibly damage it as a result of the method of fixing should be refused listed building consent.

**Boundary treatments and historic paving**

1. Many walls, railings, gates and gate piers will be listed as structures in their own right and may additionally contribute (sometimes significantly) to the quality of the setting of a listed building with which the structure is associated.
2. Any proposal to relocate, remove or reduce in height of such structures, including the widening of any access that would diminish its intrinsic interest and/or detract from the setting of the building requires careful consideration and will require listed building consent.
3. Widening to permit use by larger or greater numbers of vehicles may have a deleterious impact on the scale and significance of existing gates and gate piers and may diminish or destroy the carefully designed visual relationship between the structure and the associated listed building. The alteration of listed walls, railings or entrance gate piers to improve sightlines will rarely be acceptable and should not receive listed building consent and alternative means of gaining access should be considered.
4. The loss of any listed front garden boundary walls and railings for the sole purpose of provide off-street parking should be refused listed building consent.
5. Historic footway surfaces are only rarely listed in their own right for their intrinsic interest but where they are specifically identified, for example raised pavements, stone steps, areas of cobbles or setts etc. it is likely that this is also for the significant contribution they make to the setting of a listed building or standing structure.
6. Where these surfaces do not form part of the public highway, proposals to remove, reconfigure, or resurface in a different material will require listed building consent. Where the surfaces enjoy statutory protection, reinstatement of the original design and surface treatment may also require listed building consent but should be encouraged.

**INTERIORS**

**General principles**

1. Listing always applies to the whole building including the interior and not merely to those features described in the statutory list entry. This is irrespective of whether the interior was inspected at the time of the original survey. The listed building consent process exists for the considered management of change even where the relative significance of the constituent parts is not set out, as may frequently be the case with many early designations. Proposals for listed building consent therefore enable the merits of interiors (or otherwise) to be inspected and properly assessed prior to works of alteration or partial demolition being consented.
2. The quality of interior spaces and the survival of internal historic fabric may vary considerably. Some rooms or other internal spaces may be of undoubted heritage merit while others may have much lesser significance either individually or collectively and may have been significantly altered without this being reflected in the list description. The relative merits of each space and the nature of the proposed work must be carefully assessed to determine to what extent the character of the space may be affected in whole or in part and what works will therefore require listed building consent.
3. Importance should be attached to the completeness of the features in a room or a suite of rooms including the original or any subsequent period of construction and alteration and should distinguish those works affecting fixtures (requiring consent) and those affecting fittings only.
4. Generally the earlier a listed building is, the more extensive the internal alterations may have been given the relatively recent era in which the building will have been protected relative to its age and the point at which protection was extended to interiors; but early historic fabric may survive behind modern partitioning or suspended ceilings and it will be expected for proposed internal alterations requiring listed building consent to be thoroughly assessed and fully justified as part of the consent process.
5. The nature of proposals for alterations may be such that it is possible to anticipate the likely existence of internal features such as chimneypieces, paneling, historic plasterwork, wall paintings, stenciled decoration and wallpapers. Where such features may be predicted listed building consent is likely to be required and made conditional on careful exploratory opening up to determine what further works might be appropriate.

**Plan form**

1. The plan of a building is one of its most important characteristics. Interior plans and individual features of interest should always be respected and left unaltered as far as possible with all major works of alteration limited to areas of secondary or lesser importance. Internal walls should always be investigated with care in advance of alterations as ancient or interesting features may be hidden. In many cases the partitions themselves may be of historic interest.
2. A large property that retains its original plan form is seldom acceptable for subdivision into several smaller units, or in response to a change of use to open up a sequence of rooms to create a larger space. Listed building consent should generally be refused unless there is thorough and convincing justification that no other arrangement is possible.
3. Internal spaces, staircases, paneling, window shutters, doors and doorcases, moldings, decorated ceilings, stucco-work, and wall decorations are part of the special interest and may be the most valuable features and listed building consent will be required for their alteration or partial demolition.
4. Proposals to sub-divide or open up entrance halls, main staircases and principal rooms especially when visible from street facing windows are never acceptable and listed building consent should be refused. Where appropriate reinstatement of the interior spaces is proposed this will require listed building consent but should be always be encouraged.
5. Where alterations are unavoidable, proposals for sub-division should be confined to an absolute minimum with a positive attempt made to retain principal rooms in their designed inter-relationship. Listed building consent should ensure that new partitions should be the least necessary and should not cut through moldings or enriched plaster decoration but be shaped around them to allow for reinstatement at a later date. Conditional approval should also ensure that wherever possible, all work affecting historic fabric is undertaken in a manner that is readily reversible.
6. In the relatively infrequent instances where change of use or past internal re-planning has resulted in a feature (such as a chimneypiece or, in the case of shop premises, areas of decorative tile work) seriously inhibit the proposed use or occupation of the space, listed building consent will be required for its concealment and a thorough justification advanced that should be conditional on a detailed record being made and be deposited as publicly accessible.

**Internal rearrangements**

1. Where, as a last resort, removal of a feature is judged to be the only acceptable course of action a thorough justification must be advanced and listed building consent required and on condition that the feature must first recorded and then sensibly relocated elsewhere in the same building. Only where re-siting within the building is not possible should a fixture be the subject of conditional listed building consent permitting carefully removal and installation in another similar building.

**Flooring**

1. Flooring is too often disregarded when alterations are proposed. Careful evaluation of pre-existing floors need to be considered such as early wide hand cut oak and elm boarding, parquet flooring, patterned encaustic tile work, marble and stone flags. Pitched cobbles, old brick floors, lime ash, plaster floors and early concrete may also be of special interest. As original floors may contribute to the special interest because of their materials, form or surface treatment, proposals to alter them require careful consideration and listed building consent may be required where authentic repair is not possible. Consent should be conditional on new floorboards being of the same timber, width and thickness as those to be replaced. Proposals to remove any early sound deadening or fireproofing between the joists should be refused listed building consent.
2. Original floor levels should be respected but where internal reconstruction is unavoidable, listed building consent should refused for proposals that would affect internal proportions resulting in windows being placed too low in relation to new floor levels or requiring window positions to be altered or wall heads raised.
3. Where the floor to ceiling heights in smaller properties are regarded as now too low to be tolerably usable, favorable consideration should be given for listed building consent to excavate ground floor or basement levels with careful thought given to the survival and where appropriate, the reinstatement of historic flooring. Under some circumstances excavations may also have and archaeological implication.
4. Service routes should avoid the need to disturb part or all of a particular floor wherever possible. Where alternatives cannot be found, and lifting the flooring is necessary, great care will be needed to permit the installation, upgrading or repair of services without damage to the flooring. In the case of wide, old timber floor boarding the SPAB Information Sheet 10 on the method of lifting boards should be made a condition of consent.

**Fixtures**

1. The removal or alteration of architectural joinery of significance and other architectural fixtures of merit will always require listed building consent. This may include for example: paneling, dadoes, chair rails and other moldings; decorative woodwork and shutters; doors, door cases (and door furniture of quality or originality); built-in fixtures such as windows seats or inglenooks, wardrobes in bedrooms and cupboards in service accommodation; decorative stucco and plasterwork, floor and other tiling, marble flooring and mosaics.
2. Some historic bathroom fittings, early plumbing mechanisms and bathroom ceramics of quality may also be of interest and listed building consent may be required for their removal.
3. The courts have held that fixed decorative paintings and tapestries that form part of an architectural scheme may also be regarded as fixtures and listed building consent for their removal is likely to be required and the two principal tests are set out in the Court of Appeal case of Berkeley v. Poulett [1977].
4. Proposals to paint timber architectural joinery, particularly intricate and carved work that had not previously been painted should be refused listed building consent.
5. The removal or alteration of staircases should generally be refused listed building consent. These are often a principal feature of the building and an integral part to the structure and replacement by a modern staircase is appropriate only in exceptional circumstances. Staircases are particularly vulnerable to damage during alterations and a condition of consent should require properly instituted temporary protection to treads, balustrading and handrails etc. The removal of the lowest flight of stairs in retail premises that would preclude access to and use of upper floors - should always be refused listed building consent.
6. The removal or alteration of fireplaces containing original register grates and any associated integrated over-mantles provide important dating evidence and listed building consent should generally be refused. Where a clear and convincing case can be made that retention is not possible, relocation elsewhere within the building may be acceptable subject to a condition of consent regarding careful dismantling and re-erection in an appropriately scaled hearth opening.
7. Intricate and/or delicately detailed wood or stucco chimneypieces should only be stripped back to their original surface if the detail has been completely obscured by paint. This work requires listed building consent subject to a condition requiring a detailed method statement to ensure such decoration is not damaged. The painting of marble chimneypieces is never acceptable and proposals to do so should be refused listed building consent.
8. Proposals to alter the character and proportions of principal rooms by the introduction of suspended ceilings under original plasterwork or exposed timber framing should be refused listed building consent as damaging to the special interest. Where a case is advanced for suspended ceilings as necessary in minor rooms, for example to conceal services, listed building consent is likely to be required. This should be conditional on ensuring that the suspended ceiling height runs above window heads and no downstand is visible externally.
9. Particular care will be required where decorative features form part of the architectural scheme, notwithstanding specific reference (or otherwise) in the statutory list description. Proposals to alter historic fabric in areas where Chinese and other early wallpapers have been mounted; where there is significant stenciled decoration or where there are wall paintings of age and quality, will clearly form part of the special architectural and historic interest and although these are not regarded in law as fixtures, listed building consent may be required for any works affecting them and a clear and thorough justification would need to be advanced for their alteration or removal.
10. Where new internal walls cannot be avoided, proposals are likely to require listed building consent and this should be made conditional on ensuring that timber detailing or enriched plaster decoration or other timber joinery detailing is not cut through but scribed around these to facilitate future reinstatement.

**Structural matters**

1. Proposals for floor strengthening should generally be concealed within pre-existing floor structures, but where this is not possible visible alterations to floor structures or associated fixtures, joinery or plasterwork will be required, listed building consent will be necessary and such visible strengthening will require a detailed justification. Advice on appropriate office floor loadings and the implications for strengthening is set in the English Heritage (sic) advice ‘*Office floor loading for historic buildings’* [June 1994].
2. If proposals involve increasing the loading capacity of all the floors to the extent that there will be substantial disturbance to the structure to the extent that good quality original surface finishes will be degraded, the suitability of the building for the proposed use should be questioned and listed building consent should be refused.
3. In the rare instances where complete reconstruction of an interior is necessary listed building consent will be required ensuring that the entrance hall, stair and all principal rooms are accurately reinstated and be conditional on the careful salvage of as much as  possible of the original woodwork, doors, shutters, stair balusters and rails as possible for use in the reconstruction. Consent should also be conditional upon pre-commencement recording by photographs and measured drawings as necessary of all the features and fixtures of architectural significance to be salvaged and the spaces where they are to be reinstated.

**Machinery**

1. Proposals relating to the removal of machinery from a listed building will require listed building consent. Notwithstanding that the definition of a building under planning legislation is specifically defined to exclude ‘plant or machinery comprised in a building’, heritage legislation **[5]** refers inter alia to an *object* attached to a building although as a fixture this would require the plant and machinery to be held in position by more than its weight alone.

**Appendix 1**

**Background to this Guidance Note**

The IHBC recognises the importance of dependable technical advice on alterations not only by heritage professionals in local authorities, but by other public authorities, property owners, developers, amenity bodies and all members of the public with an interest in the conservation of the historic environment **[6]** and in circumstances where such matters are considered by the Planning Inspectorate.

It is therefore considered that in the absence of officially endorsed detailed guidance, some form of professionally endorsed advice is necessary based on the sort of sound principles of the kind that had been effective and informative in England for nearly a quarter of a century until withdrawn in 2010, also taking into account invaluable guidance from Historic Scotland, and technical advice from other highly respected (in some cases definitive) technical sources of advice such as The Society of the Protection of Ancient Buildings .

**Policy audit trail**

Central government policy advice on the alteration of historic buildings was first introduced in England by the Department of the Environment Circular 8/87 Historic Buildings and Conservation Areas – Policies and Procedures and issued in March 1987.

The Circular contained an eight page Appendix IV entitled Technical Digest on Alterations to Listed Buildings and ran to 3,260 words. Its purpose was to “assist local authorities in deciding on the suitability of alterations to listed buildings (…) compiled by the Historic Buildings Inspectors of the Historic Buildings and Monuments Commission for England (English Heritage), who have extensive experience of alteration work.”

As well as setting out conservation principles and works to exteriors and interiors, Appendix IV offered advice on an eclectic selection of specialist building types including *inter alia* public houses and billiard halls; seaside piers, esplanades and promenades; garden ornaments; and theatres and cinemas.

In September 1994, the technical appendix to Circular 8/87 was superseded by Planning Policy Guidance Note 15 [PPG15] - Planning and the Historic Environment Annex C - Guidance on alterations to listed buildings. The text was expanded to 5,300 words and built on the initial 1987 advice. **[7]** This proved invaluable for authoritative, practical day-to-day heritage management advice on a wide range of specific external and internal alterations frequently encountered in applications for listed building consent.

In 2010, PPG 15 was cancelled and superseded by Planning Policy Statement 5 [PPS5] - Planning for the Historic Environment. This short document failed to include any technical guidance on alterations to listed buildings but in turn was cancelled and replaced by the National Planning Policy Framework [NPPF] on 27 March 2012.

The NPPF providing considerably condensed generic heritage guidance but again omitted any usable detailed advice on alterations to listed buildings. The NPPF was also clearly and specifically aimed at a local authority policy-making audience, effectively ignoring listed building property owners, developers, heritage amenity bodies and the general public who would also have benefited from such advice.

Sound and authoritative advice on alterations to listed buildings bearing the imprimatur of the Department of the Environment after 1987 had been seen to stand the test of time in both planning decisions and planning appeals. By reducing the level of planning (and heritage) guidance (that at the time extended to a 13-page table of withdrawn circulars and other publications) the official status of government advice on alterations to listed buildings was discarded.

**The continued relevance of withdrawn advice**

Shortly after this ‘bonfire of the red tape’ **[8]** a leading planning law commentator[[1]](#endnote-1) in addressing what he saw as ‘useless new planning guidance’ made a number of valuable points that apply equally and directly to the question of the status and availability of officially endorsed technical heritage advice on alterations.

In expressing a view that it was folly to scrap some excellent, sound advice (as diverse, for example, as that regarding trees, and the award of costs in planning appeals) Martin Goodall stated that the new generic simplified guidance: “does not even begin to answer many of the points that will inevitably arise in practice, and will leave the many users of the planning system, not to mention LPAs and the Planning Inspectorate, without any guidance as to how such issues should be resolved.” **[9]**

He went on to state that: “I have no intention of discarding my copies of circulars (…) among other very useful summaries of practice and procedure, and I intend to go on referring to them in applications and appeals, even though they have been cancelled. The principles that they explained continue to be relevant and applicable, and so it seems entirely proper to refer to them as a reliable guide to the correct approach to be taken to the many issues that crop up in the course of dealing with planning cases.”

“I predict that the government (…) will be forced to revisit this practice guidance and to beef it up substantially, by restoring much of the detail that has been so wantonly discarded.” Sadly regarding alterations to listed buildings this prediction has not been fulfilled.

**The interim Practice Guide and the NPPF**

The demise of PPS 5 and the introduction of the NPPF made it necessary in March 2010 for English Heritage to publish jointly with the Department of Communities and Local Government [DCLG] and the Department for Culture Media & Sport [DCMS] an interim PPS 5 Practice Guide to address some of what had been withdrawn by PPG 15.

Section 6 of the Practice Guide dealt with ‘Further guidance on making changes to heritage assets’ sub-divided into sections on repair; restoration; addition and alteration (either singly or in combination); and works for research alone and therefore introduced a significant archaeological component of limited help when dealing with alterations to listed buildings. Each type of intervention was then considered for: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and large heritage assets including conservation areas[[2]](#endnote-2). The specific advice on alterations to listed buildings was reduced from 5,300 words in Annex C to a mere 960 words in PPS5.[9]

The PPS 5 Practice Guide was replaced in turn by Historic England Advice Note 2 – Making Changes to Heritage Assets published on 25th February 2016. This document is intended to illustrate the application of the policies set out in the NPPF when determining applications for planning permission and listed building consent (but also other non-planning heritage consents, including scheduled monument consent). It is therefore much more of a portmanteau document. The section dealing with alterations to historic buildings runs to 1,100 words and largely replicates the generic content of the related section of the Practice Guide.

In the context of the loss of specialist expertise in local planning authorities; concerns about inconsistence of professional advice; and the wider needs for clarity and certainty by property owners, developers, amenity bodies and members of the public, property owners, developers, amenity bodies and all members of the public, the need for clear, sound advice is essential. The Institute is aware from its members that the current level of specific technical advice is not sufficiently detailed for the purposes of effective in the management of alterations to listed buildings.

While it is recognises that Historic England’s Advice Note 2 has a role, it is not considered to be sufficiently specific for practical day-to-day advice regarding alterations. The document also has nothing to say on, for example, on the particular challenges of dealing with alterations to 20th century listed buildings and the specialized, sometimes patented materials from which they are constructed.

**Endnotes**

[1] With regard to repairs, PPG 15 Annex C paragraph C.1 referred to *The Repair of Historic Buildings: Advice on Principles and Methods* published by (the then) English Heritage. This document was subsequently withdrawn. See <https://historicengland.org.uk/advice/technical-advice/buildings/maintenance-and-repair-of-older-buildings/principles-of-repair-for-historic-buildings/>

[2] The period between the publication of the Appendix IV - Technical Digest **of** Circular 8/87 (March 1987 and Annex C of PPG15 (September 1994)

[3] The Institution of Structural Engineers can give advice on suitable conservation accredited engineers at <https://www.istructe.org/about-us/organisation-structure/subsidiary-organisations/conservation-accreditation-register-for-engineers>

[4] The Act states S.1A that: In making building regulations the Secretary of State shall have regard, in particular, to the desirability of preserving the character of protected buildings that are of special historical or architectural interest.

[5] In England S.1(5) of the Planning (Listed Buildings & Conservation Areas) Act 1990

[6] As emphasised by the introductory paragraph 3 of PPG 15 but omitted in subsequent government guidance, i.e. no longer aimed at a widely drawn readership

[7] In Annex C the advice on specific building types was omitted

[8] <http://webarchive.nationalarchives.gov.uk/20150522175321/http://www.redtapechallenge.cabinetoffice.gov.uk/home/index/>

[9] See Martin Goodall Planning Law Blog 7th March 2014 <http://planninglawblog.blogspot.co.uk>

[10] but also including formal or informal landscapes even though these are considered by planning not heritage legislation, clusters of scheduled monuments and World Heritage Sites where the whole might be considered greater than the sum of the parts. It was also noted that some heritage assets might fall into more than one category.

1. [↑](#endnote-ref-1)
2. [↑](#endnote-ref-2)