



FAO: Planning Department,
Runnymede Borough Council

Ref: RU.23/1639
Date: 25/03/2024

BUILT HERITAGE ADVICE

Dear Sir / Madam,

RE: Longcross Church, Longcross Road, Chertsey, Surrey, KT16 0DU.

Built Heritage Advice pertaining to an application for: Listed Building Consent for the alteration of windows above the front entrance porch to allow for smoke vents, alterations to the shape of the dormers permitted under RU.19/0695, and the addition of rooflight and ventilation for Flat 5 to rear of building, also permitted under RU.19/0695. (part retrospective).

A site visit was undertaken on Wednesday 14th February 2024.

The proposed development site (the Site) is the Grade II listed Longcross Church (List Entry Number: 1390819). It is in close proximity to the Grade II listed Lychgate with Attached Churchyard Wall, Longcross Church (List Entry Number: 1390820) with which it has group value, and which has the potential to be impacted through change within its setting.

In statutory terms the significance of the heritage asset has been recognised by its designation as a Grade II listed building, which reflects its 'special interest'. The Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA Act 1990) states that Local Planning Authorities have a statutory duty to 'have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' under Section 16(2).

Section 7 of the above Act states that no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest. Under Section 9 of the Act, contravention of Section 7 is a criminal offence.

Furthermore, Paragraph 205 of the National Planning Policy Framework (NPPF) states:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.



The description, application form, and submitted heritage statement make reference to the following proposed alterations (part retrospective):

- Alteration of window above the front entrance porch to allow for smoke vents,
- Alterations to the shape of the permitted dormers (permitted under RU.19/0694 & RU.19/0695), and
- Rooflight and ventilation for Flat 5 to rear of building.

However, the proposed drawings show additional alterations to windows to the east, west, and south elevations. The site visit has confirmed these alterations, as well as alterations to the north elevation windows, have already been undertaken and so these proposals are also retrospective.

Alterations to windows to east, west, north, and south elevations

The site visit and proposed plans show that the permitted development (RU.19/0694) has not been carried out in complete accordance with the following approved plans:

- C/Ch/1710/07
- C/Ch/1710/08A

The Planning Application Form submitted in support of the above application also confirmed the proposed window materials to be *'timber and metal.'*

Furthermore, the Officer's Report dated 02/10/19 states:

The building has a number of existing windows, in various states of disrepair. The applicant has advised that these would be repaired and some converted to opening windows and used for ventilation... According to the applicant, no original window openings would be blocked, windows would open inwards and no new major windows are needed. The horizontal separation of the building leads to a new floor structure passing across the long side windows, which is handled by introducing extra glazing bars at this point.

The works to the windows undertaken to date, go far beyond this approved scope.

The loss of traditional windows from historic buildings poses one of the major threats to our heritage. Traditional windows and their glazing, particularly to historic churches, make an important contribution to their significance.

The pre-existing windows comprised steel frames containing leaded light windows and stained glass including original grisaille glass. They were of special architectural, artistic, and historic interest and made a considerable contribution to the significance of the heritage asset. They were an integral part of the design of the Church and were important artefacts in their own right; crafted with great skill and ingenuity with materials of a high quality.

Historic England guidance, *Traditional Windows: their care, repair and upgrading*, is clear, and states that traditional and historic windows should **only be replaced if they are beyond repair or**

refurbishment, which should be demonstrated via a Condition Survey Report, ideally undertaken by a Conservation Accredited Engineer¹ or Consultant.²

During the site visit, several of the pre-existing windows were available for visual inspection and it is considered that many had elements which could have been repaired and refurbished (see photographs below). Certainly, there was potential for historic glass to have been salvaged and reused in an appropriate manner. In any case, it has not been sufficiently evidenced that all windows were beyond repair or refurbishment to require replacement.

Notwithstanding the lack of evidence, the guidance is also clear that historic windows which contribute to the significance of a designated heritage asset, but are beyond repair or refurbishment, should only be replaced on a strictly like-for-like basis.



The works to the windows include the wholesale loss of original window frames and leaded light windows, the partial loss of original stained glass, the severing of stained-glass compositions, and the reframing of stained glass within triple-glazed inappropriate and unsympathetic uPVC frames (which have distinctly visual and operational differences that detract from significance). It is also understood that many of the stone dressings to the hood mouldings have been damaged, deconstructed, or removed as part of this process.

The design, detailing, and operation of the uPVC windows mean that they look notably different to traditional windows. Manufacturers have been unable to replicate the sections and glazing bars

¹ <https://www.ice.org.uk/download-centre/conservation-accreditation-register-of-engineers>

² <https://www.ihbc.org.uk/hespr/>

used in most steel -framed leaded light windows, due to the limited strength of the material and the additional weight. In this instance, the visual and operational differences are considerable.

It is my view that the above works were undertaken without listed building consent. It is a criminal offence to undertake works to a listed building without consent (Section 7(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990).

Furthermore, the works are contrary to guidance, best practice, and core conservation principles. Consequently, these works have resulted in less than substantial harm to the designated heritage asset, making Paragraphs 206 and 208 of the NPPF relevant. If we consider this on a scale of low, medium, high, it is my view that the harm is of medium-high less than substantial harm.

In conclusion, it is my professional opinion that the pre-existing windows should be reinstated using as much of the original and historic fabric as possible. Where it is necessary to use new fabric, this should be on a strictly like-for-like basis, wholly reflecting that of the pre-existing windows.

Alteration of window above the front entrance porch to allow for smoke vents

Given that the works to the windows to date have been undertaken without consent, this proposal will be assessed using the pre-existing state of the windows as the established heritage baseline.

The window above the entrance porch is located on the most prominent elevation and positively contributes to the significance of the heritage asset. The proposals would result in the loss of historic stained glass of special architectural, artistic, and historic interest, and the smoke vents would have an adverse visual impact on the window and principal elevation detracting from the special interest of the listed building.

As such, the proposals would lead to less than substantial harm to the designated heritage asset, making Paragraphs 206 and 208 of the NPPF relevant.

Alterations to the shape of the permitted dormers (permitted under RU.19/0694 & RU.19/0695)

The site visit confirmed that these proposals are retrospective.

Whilst the form and design of the proposed dormer windows do not represent any additional harm than that of the dormers permitted under RU.19/0694 & RU.19/0695, there are concerns regarding the materiality which comprises non-traditional materials such as uPVC. Again, this has not been consented and the windows should be of timber and/ or metal as stated within the Planning Application Form.

The use of inappropriate and unsympathetic non-traditional materials results in an adverse visual impact on the designated heritage asset and lack authenticity. As such, the proposals would lead to less than substantial harm to the designated heritage asset, making Paragraphs 206 and 208 of the NPPF relevant.

Rooflight and ventilation for Flat 5 to rear of building

There are also concerns regarding the proposed rooflight and ventilation. Rooflights are an incongruous addition to this building typology in that they are a distinctly domestic feature and would detract from the architectural and historic interest of the Church. Furthermore, their installation will result in the loss of historic fabric. As such, the proposed rooflight is considered to result in less than substantial harm to the designated heritage asset, making Paragraphs 206 and 208 of the NPPF relevant.

The submitted Heritage Statement asserts that the works 'are required for building regulations relating to fire and ventilation'. However, Paragraph 0.10 of Approved Document B (Fire) states:

Where Part B applies to existing buildings, particularly buildings of special architectural or historic interest for which the guidance in this document might prove too restrictive, some variation of the provisions in this document may be appropriate. In such cases, it is appropriate to assess the hazard and risk in the particular case and consider a range of fire safety features in that context.

Additionally, Paragraph 0.5 of Approved Document F (Ventilation) states:

Work to the following types of dwellings may not need to comply fully with the ventilation standards in this approved document.

- a. Those listed in accordance with section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- b. Those in a conservation area designated in accordance with section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.*
- c. Other historic buildings with a vapour-permeable construction that both absorbs moisture and readily allows moisture to evaporate. These include those built with wattle and daub, cob or stone and constructions using lime render or mortar.*

It is my view that the heritage asset is, therefore, exempt from complying fully with the aforementioned building regulations if doing so compromises its special interest and significance.

Overall, the proposals, retrospective proposals, and works undertaken without consent result in medium-high levels of less than substantial harm to the designated heritage asset when considered both individually and cumulatively, engaging Paragraph 208 of the NPPF. Under Paragraph 205, great weight should be given to the asset's conservation, irrespective of the level of harm. No harm to the nearby Lychgate has been identified.

Consequently, they are in conflict with Sections 7 and 16(2) of the Planning (Listed Building and Conservation Areas) Act 1990. As stated above, Under Section 9 of the Act, contravention of Section 7 is a criminal offence.

Yours sincerely,


Historic Environment Team
Place Services

Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter