

Consultation Details

Consultee: Peter Thomas
Case Officer: Gareth Davies
Application No: P/26/0153
Application Type: Listed Building Consent
Site Address: 1 Vulcan Court Vulcan Road Merthyr Tydfil CF47 8LZ
Description of Works: Replace existing timber front door, frame and side screens with an exact copy in laminated timber to match original in style and colour. (Listed Building Consent)

Heritage Considerations

☒	Listed Buildings	☐	Scheduled Monuments
☒	Conservation Areas	☐	Historic Parks and Gardens
☐	Historic Landscapes	☐	Other

Recommendation(s)

☒	No objection	☐	Notes for applicant
☐	Object (Holding objection)	☐	Request for further information
☐	Object and recommend refusal	☐	Recommend conditions

Relevant Legislation and Policy Context

This consultation response has been prepared in the context of the duties placed upon the local planning authority by the Town and Country Planning Act 1990 ("TCPA 1990) and the Historic Environment (Wales) Act 2023 ("HEWA 2023).

Section 96(2) of the HEWA 2023

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

- (a) the listed building to which the application relates,
- (b) the setting of the building and
- (c) any features of special architectural or historic interest the building possesses."

Section 160(1) of the HEWA 2023

"In exercising a planning function in relation to a building or other land in a conservation area, a person must have special regard to the desirability of preserving or enhancing the character or appearance of that area."

Note - this is the starting point for assessment of all applications relating to listed buildings and conservation areas

The above raises two primary questions:

1. Would the development affect the historic asset or its setting (and, if so, in what way and to what extent)? and,
2. Would the identified effect preserve (or enhance) the historic asset, in the context of the statutory duty to have special regard to the desirability of preserving it?

The Barnwell Manor Wind Energy Ltd Court of Appeal judgment in 2014 contains important findings which have direct implications for casework where a listed building or its setting is affected or where it involves a building or other land in a conservation area. It held that despite the slight difference in wording, the nature of the duty in relation to listed buildings and conservation areas is the same and that a decision-maker, having found harm to a heritage asset, must give that harm “considerable importance and weight”.

Your report should expressly acknowledge the need, if harm has been found, to give considerable weight to the presumption that preservation is desirable and demonstrate that this has been done. Otherwise, it would not reflect the duty under s314A TCPA 1990 or s161 HEWA 2023. How that balance will be performed will depend on the factors in the case, but it will always be important to recognise the special status which s314A TCPA 1990 or s161 HEWA 2023 confers upon the relevant relationship with heritage assets and conservation areas.

National Policy

National policy is provided in Planning Policy Wales (PPW) Edition 12, which sets out a presumption in favour of the conservation of the historic environment (Chapter 6). This is supplemented by Technical Advice Note 24: The Historic Environment (TAN 24), which requires that any harm to a listed building must be convincingly justified and that alterations must be the minimum necessary and avoid adverse impact on special interest (paras 5.11–5.15).

Relevant guidance from Cadw, including Conservation Principles and Managing Change to Listed Buildings, has been used to inform this assessment where appropriate.

Reasons

Listed Building Consent is sought for the removal of the existing timber entrance door, frame and side screens at 1 Vulcan Court and their replacement with a painted timber assembly on a like-for-like basis. The Heritage Impact Statement states that the replacement will match the existing dimensions, proportions, panels, glazing arrangement and mouldings, with no alteration to the size of the opening or wider architectural composition.

Vulcan House, including its attached rear range, forecourt wall and gate, is Grade II listed. The principal building dates from approximately 1820–30 and comprises a substantial late Georgian house with an attached former industrial range. Its special interest derives particularly from the rare survival of combined domestic and industrial premises and its associations with David John and his family, prominent figures in nineteenth-century political radicalism in Merthyr Tydfil.

The building has substantial evidential value through surviving early fabric illustrating its construction, combined domestic and industrial function and subsequent development. Its historical value is particularly high because of its association with Merthyr's industrial development, political reform and the Merthyr Rising. Its aesthetic value derives from the scale, symmetry and architectural composition of the late Georgian house, including its five-bay frontage, rendered elevations and carefully ordered openings. The central entrance makes an important contribution to the hierarchy and composition of the principal elevation. The building also possesses communal value through its ability to illustrate important aspects of Merthyr Tydfil's industrial and political history.

Importantly, however, the existing entrance joinery is clearly a modern intervention. The statutory list description records that when inspected in July 2006 the original central entrance had been blocked. The door, side screens and glazed overlight visible today must therefore have been installed after that inspection. They do not represent original or early historic fabric.

The features particularly relevant to this application are the symmetrical composition of the principal elevation, the scale and proportions of the central arched opening and the visual relationship of the entrance with the wider façade.

While the existing joinery contributes positively through its traditional material and proportions, its significance is principally derived from its compatibility with the listed building rather than its own historic fabric.

The proposal involves removal of the existing modern timber door, frame and side screens and installation of a replacement painted timber assembly replicating the existing proportions, panels, glazing arrangement and mouldings. The applicant states that the existing joinery is affected by rot, decay, weathering, deterioration of its protective finish and reduced weather resistance and security.

As the existing entrance assembly post-dates July 2006, its removal would not result in the loss of original or early historic joinery. Its evidential and historical value is consequently very limited. The principal consideration is therefore whether the replacement would preserve the architectural character of the entrance and its contribution to the composition of the listed building.

The present arrangement consists of a panelled timber door, narrow side screens and a glazed arched overlight contained within the established opening. Provided these proportions, subdivisions, materials and detailing are accurately reproduced, the replacement would maintain the established appearance and architectural hierarchy of the elevation.

The works would not affect the historic plan form, principal structure, former industrial range, roof, historic masonry, curtilage structures or setting of the listed building. The principal heritage risk therefore arises from the detailed design and execution of the replacement rather than from the principle of removing the existing door. Simplified mouldings, altered framing proportions, inappropriate glazing or modern detailing could weaken the architectural quality of the entrance. These matters can be appropriately controlled by condition.

Replacement would address deterioration, improve weather resistance and security and assist the continued maintenance and use of the building. These constitute legitimate conservation benefits.

The proposed use of laminated timber is acceptable in principle. As the existing entrance joinery is a post-2006 intervention, the principal heritage consideration is the appearance and detailing of the replacement rather than replication of an historic method of joinery construction. Subject to the laminated timber being a durable external-grade timber product, finished in paint, and capable of accurately reproducing the existing proportions, mouldings and profiles, its use would not adversely affect the special architectural or historic interest of the listed building.

Although the Heritage Impact Statement provides limited technical evidence demonstrating that repair would be impracticable, the importance of this deficiency is substantially reduced by the modern date of the existing assembly. There is no conservation requirement to retain deteriorated post-2006 joinery where an appropriately detailed timber replacement can maintain the established architectural character.

Conclusion and Recommendation

The proposed works have been assessed in relation to their impact on the special architectural or historic interest of the historic assets. In accordance with Technical Advice Note 24 and Planning Policy Wales, there is a presumption in favour of preserving historic assets and their features of special interest, including their setting.

The proposal would remove modern fabric of limited heritage significance while retaining the established entrance opening, material, proportions and architectural composition.

Subject to detailed control over the replacement joinery and careful protection of surrounding historic fabric, the works would preserve the features from which the special architectural and historic interest of Vulcan House principally derives.

Conditions

1. Prior to installation of the replacement door, detailed joinery drawings shall be submitted to, and approved in writing by, the Local Planning Authority. These shall include elevations at a scale of not less than 1:10 and sections at a scale of not less than 1:5 showing the door, frame, side screens, overlight, glazing, mouldings, beads, threshold and associated profiles, as applicable. The works shall thereafter be carried out in accordance with the approved details.

Reason:

To ensure that the replacement joinery preserves the proportions, detailing and architectural character of the entrance and the special architectural and historic interest of the listed building.

2. Prior to manufacture of the replacement entrance assembly, details of the proposed laminated timber construction, external finish, glazing and ironmongery shall be submitted to and approved in writing by the Local Planning Authority. The entrance assembly shall be finished in paint and completed in accordance with the approved details.

Reason:

To ensure that the materials, detailing and finish of the replacement entrance preserve the architectural character and special interest of the listed building.

3. Removal of the existing entrance and installation of the replacement shall be undertaken without enlargement or alteration of the existing architectural opening. Disturbance to surrounding historic masonry, render and other fabric shall be kept to the minimum necessary. Any making good shall use materials, profiles and finishes compatible with the existing fabric.

Reason:

To minimise unnecessary loss or damage to historic fabric and preserve the architectural integrity and special interest of the listed building.