

Consultation Details

Consultee: Peter Thomas
Case Officer: Gareth Davies
Application No: P/26/0058
Application Type: Listed Building Consent
Site Address: Canolfan Soar Pontmorlais High Street Merthyr Tydfil CF47 8UB
Description of Works: Creation of a new entrance on the northern elevation, together with replacement sash windows, installation of new external timber doors and renovation of the rendered elevations.
Refurbishment of the basement level, including waterproofing of walls and floor, installation of new floor slabs and associated reconfiguration of the internal spaces and installation of a moveable acoustic wall/screen.

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 314A(1) of the TCPA 1990

“In considering whether to grant planning permission for development which affects a listed building or its setting, the Welsh Ministers or a local planning authority in Wales must have special regard to the desirability of preserving—

- (a) the listed building,
- (b) the setting of the building, or
- (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.

Assessment

Proposal

Refurbishment and conversion of the basement level of Canolfan Soar (Zoar Chapel complex) to provide habitable community accommodation, including meeting rooms, WCs and ancillary spaces. The works include removal of modern fabric, installation of a comprehensive waterproofing system, formation of new internal layouts, insertion and reinstatement of openings, replacement of windows and doors, and alterations to external ground levels.

The Listed Building

Grade II listed Welsh Congregational chapel, constructed in 1842, with later attached ancillary ranges including the former Sunday School and subsequent extensions. The application relates to the basement level within these ancillary structures.

The building is of rubble stone construction with slate roof, and while the principal architectural significance lies in the main chapel, the ancillary ranges form part of the listed structure and contribute to its historic development. Listing grade does not in itself determine sensitivity; the level of significance varies across the complex.

Significance

Evidential Value

The building retains historic rubble stone walling and structural form, including basement masonry that evidences construction techniques and later adaptation. Investigations have confirmed the survival of historic fabric beneath modern finishes .

Historical Value

The complex reflects the development of Nonconformist worship and associated community functions, including education and social use through the Sunday School and later adaptations.

Aesthetic Value

The principal chapel has strong architectural character; the basement and ancillary ranges are more utilitarian but contribute to the overall group value. Their external expression and relationship to ground levels remain important.

Communal Value

The building continues to serve a community function and retains strong social significance as Canolfan Soar.

Key Features Contributing to Significance

The significance of the building is derived from a combination of its surviving historic fabric and overall form. This includes the rubble stone external walls and structural thicknesses, which illustrate traditional construction methods, and the survival of historic openings, including those that have been blocked, which provide evidence of change over time. The relationship between the building and external ground levels is particularly important in understanding the basement's function and condition. The overall form of the chapel and its ancillary ranges contributes to its group value, while any surviving historic fabric concealed beneath modern finishes retains evidential importance.

Description of Proposed Works

The proposals comprise a comprehensive refurbishment of the basement, including the removal of modern partitions, finishes and floor structures to expose the underlying masonry. A new internal layout will be introduced using stud partitions and acoustic walls, alongside the insertion of new door openings and the reinstatement of historic openings. Windows and external doors will be replaced or inserted where required.

A key component of the scheme is the installation of a full waterproofing system, incorporating both tanking and cavity drainage measures, together with new insulated floor and wall build-ups. Externally, render will be removed to expose rubble stone, which will be repaired and repointed in lime mortar, and new stone-faced wall sections will be introduced where necessary. Internal finishes, doors and ironmongery will be renewed, and external ground levels will be regraded to improve access and drainage.

Impact on Significance

The proposals will result in a combination of beneficial and adverse effects on the significance of the listed building.

The removal of modern finishes and interventions will expose historic masonry and allow for repair, which is a clear conservation benefit. The removal of cementitious render and reinstatement of lime-based finishes will improve the building's ability to manage moisture and will enhance the legibility and performance of the historic fabric. These elements align with established conservation principles of minimum intervention and repair.

The proposed waterproofing strategy is now sufficiently defined at a conceptual level to understand its implications. The use of a combined Type A (cementitious tanking) and Type C (cavity drain membrane) system represents a robust and technically recognised approach to achieving a dry, habitable environment within a basement. However, this approach fundamentally alters the way the historic fabric performs. The masonry walls will be isolated from the internal environment and will no longer function as breathable elements. Instead, moisture will be managed through engineered systems. This results in a shift from a fabric-led environmental performance to one that is system-dependent.

The introduction of insulated wall and floor build-ups reinforces this approach. These elements will conceal sections of historic fabric and create a clear separation between the original structure and the internal environment. While this is effective in addressing known issues of damp and thermal performance, it reduces the visibility of historic fabric and introduces a reliance on the continued performance of membranes, drainage systems and associated infrastructure.

The insertion of new openings and reconstruction of wall sections will result in localised loss of historic fabric. These works are generally located within areas that have already been subject to alteration, which moderates their impact. Nevertheless, they represent permanent change and require clear justification.

The regrading of external ground levels and introduction of drainage measures will alter the relationship between the building and its setting. These works have the potential to improve the management of water around the structure but also change the way the building interfaces with the surrounding ground conditions.

The submitted information now provides a clearer indication of the intended ventilation approach, including the incorporation of trickle vents within replacement windows. However, passive ventilation of this type is unlikely to be sufficient in isolation to manage humidity and condensation risk within a sealed basement environment. The success of the overall strategy will depend on the delivery of a coordinated ventilation system capable of managing internal conditions alongside the waterproofing measures. Without this, there remains a risk that moisture-related issues could persist or re-emerge in a different form.

The proposals will improve the condition and usability of the basement but do so through an intervention-led approach that changes the way the historic fabric functions and is experienced. The impact is therefore one of managed change, with clear benefits but also identifiable risks.

Justification and Public Benefits

The proposals are justified on the basis of addressing significant defects within the basement, including moisture ingress, poor environmental conditions and limited usability, as evidenced in the condition report.

The works will:

- enable the continued and viable use of the building as a community facility
- improve internal environmental conditions
- remove harmful modern materials
- provide accessible and functional accommodation

These benefits are credible and directly related to the ongoing use and conservation of the building.

The waterproofing strategy, while interventionist, is supported by the evidence of persistent damp and the limitations of previous alterations, which have introduced impermeable materials and contributed to moisture retention. The proposed system offers a means of managing these conditions and achieving a usable internal environment. However, the justification would be strengthened by clearer evidence that alternative, less interventionist approaches have been fully considered and discounted. The reliance on a system-based solution places importance on the long-term maintenance and performance of those systems.

The submitted drawings indicate that trickle vents are to be incorporated within the replacement windows. This raises both technical and heritage concerns. Trickle vents provide only limited passive ventilation and are unlikely to adequately manage humidity, condensation risk or air quality on their own. Their effectiveness is particularly constrained where the internal environment is effectively sealed from the surrounding fabric. As such, reliance on

trickle vents as part of the ventilation strategy appears insufficient without a clearly defined and robust mechanical system. In addition, the insertion of trickle vents within new joinery has the potential to affect the appearance and detailing of windows, particularly where they interrupt the proportions or profiles of otherwise traditional designs.

Planning Balance

The proposals will give rise to both beneficial and adverse effects. The principal benefits lie in securing the long-term use of the building, improving its condition and removing inappropriate modern interventions. These carry weight.

The adverse effects arise from the level of intervention proposed, particularly the introduction of comprehensive waterproofing and insulation systems which alter the functional behaviour of the historic fabric, conceal elements of evidential value and introduce reliance on modern building systems. There is also some residual uncertainty regarding the detailed performance of the ventilation strategy and the integration of passive measures such as trickle vents within a sealed environment.

Additional Information Required

In this case, the scheme proposes a high level of intervention, particularly in relation to waterproofing and environmental control. As such, certain matters need to be clearly understood before a decision can be made, while others can reasonably be secured through condition.

Information relating to the overall approach, particularly how moisture will be managed and how the building will function as a dry, habitable space, is fundamental to assessing whether the proposals are justified and proportionate. Without this, it is not possible to reach a fully informed view on the impact of the works or their long-term implications for the historic fabric.

At present, the waterproofing approach is broadly established, but there is insufficient clarity around ventilation and the management of condensation risk. These are critical to the success of the scheme and directly influence whether the proposed level of intervention is necessary and appropriate.

Information required prior to determination

- Clear explanation and justification of the waterproofing strategy (including why this level of intervention is necessary)
- A defined ventilation strategy (including whether this is mechanical, passive, or hybrid, and how it will function in a basement environment)
- High-level assessment of moisture and condensation risk, including how new insulated systems interact with historic fabric
- Identification of historic fabric to be retained, altered or removed, with justification

Draft Conditions

Subject to the concerns above being overcome I recommend conditions as follows:

1. Details and samples of all external materials, including stone repair and lime mortar specification
2. Joinery details for all new windows and doors (including sections and finishes)
3. Method statement for removal of render and repointing works
4. Details of ventilation grilles and external penetrations
5. Recording of exposed historic fabric prior to alteration
6. Confirmation that only non-historic fabric will be removed unless otherwise agreed
7. Topographic Survey
8. Removal of cement by handtool as specified in 22-1039-220 Rev D