

WELWYN HATFIELD BOROUGH COUNCIL
DEVELOPMENT MANAGEMENT COMMITTEE – 12 SEPTEMBER 2024
REPORT OF THE ASSISTANT DIRECTOR (PLANNING)

6/2024/0468/LB

TEMPLEWOOD PRIMARY SCHOOL PENTLEY PARK WELWYN GARDEN CITY AL8 7SD

INSTALLATION OF REPLACEMENT WINDOWS, DOORS AND GLAZED SCREENS TO THE
EXTERNAL ELEVATION AND ENTRANCE LOBBY

APPLICANT: Mr Gavin Johnstone

1. Site Description

- 1.1 The application site is located within Welwyn Garden City and within the Welwyn Garden City Conservation Area.
- 1.2 Templewood School is a Grade II* listed building dating from 1950 and designed by C. H. Aslin for Hertfordshire County Council (list entry no. 1101085). The school was constructed from a steel frame with pre-cast concrete panels, it has an irregular plan with the hall at its core and classrooms extending from this in a staggered arrangement.
- 1.3 Listing marks and celebrates a building's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations. The significance of Templewood Primary School is recognised through its statutory designation as a Grade II* listed building. Grade II* listed buildings represent just 5.8% of listed buildings which reflects their particular importance of more than special interest.
- 1.4 The building is used as a primary school, with 224 children on the roll as stated on Hertfordshire County Council's website.

2. The Proposal

- 2.1 This application seeks listed building consent for the installation of replacement windows, doors and glazed screens to the external elevation and entrance lobby.
- 2.2 The submitted application form describes the existing materials as: "*Crittall old Medium Universal range windows, doors and glazing screens*". The application form states that the proposed replacement materials would be "*Crittall W20 windows, doors and glazing screens*".

3. Reason for Committee Consideration

- 3.1 This application is presented to the Development Management Committee because the recommendation is for refusal and Councillor Jean-Paul Skoczylas has called the application in for the following summarised reasons:

- *The public benefits of this proposal outweigh the potential heritage harm.*

- *The proposed wholesale replacement of the deteriorated windows is the optimal solution to the issue over and above other options.*
- *Whole life cycle cost is better value than other alternatives such as secondary glazing.*
- *The proposed windows have lower visual change impact from all angles than secondary glazing.*
- *Alternative solutions such as secondary glazing will determinately affect the heritage value of the clay tiled windowsills.*
- *Alternatives such as secondary glazing present potential environmental risks detrimental to child health.*
- *Alternatives to the proposal reduce the functionality as a school.*
- *Further public benefits are; it has a lower energy impact and is more sustainable and it ensures the continued usage of the premises as a school for future generations.*

4. Relevant Planning History

- 4.1 6/2021/2497/LB- Excavation of soil and drainage channels externally and internal repair to plaster damage by damp and repair works to a listed wall mural. This was granted and allowed for the excavation of soil and drainage channels externally to rectify damp problems in and around the dining room section of the main building.
- 4.2 6/2019/2504/LB - Alterations to the boiler flue route and existing internal pipework route. This was granted and allowed for alterations to the original proposed boiler flue route and for alterations to existing internal pipework route and heat emitters/radiators (to follow original route and location). This followed an application for similar works that was granted under application ref: 6/2019/0090/LB.
- 4.3 6/2018/2598/LB - Listed Building consent to undertake an Asbestos Refurbishment and Demolition survey. This was granted to allow samples to be taken to test for asbestos.
- 4.4 N6/2014/2639/LB - Installation of replacement windows, doors and glazed screens to the external elevation and entrance lobby- This application was refused for the following reason:
- The proposed replacement of the windows, doors and glazing screens with double glazed Crittall units and removal of the original would cause substantial harm to the Grade II* Listed building and its significance and subsequently would have a significant detrimental effect on the appearance of the building detracting from its architectural quality. The proposal would fail to sustain or enhance the existing building and would result in substantial harm that is not outweighed by any substantial public benefit. Accordingly, the proposed development would be contrary to the National Planning Policy Framework and Policy D1 of the Welwyn Hatfield District Plan 2005.*
- 4.5 N6/2014/1377/LB- Installation of new felt roof and domed rooflights underneath existing roof lanterns- This application was granted and allowed for repairs to the existing roof that were required to maintain the building, as well as the safety of the roof structure for continued school lights.
- 4.6 N6/2013/0983/LB- alteration to existing roof. This application allowed for the replacement of a number of high-level windows, with Crittall units, as part of roof alteration works. As part of this proposal for alterations to the roof, 5 high level elongated windows were allowed to be replaced. The Officer's report details the following: "*Whilst the use of Crittall windows is considered appropriate, the use of double glazing needs to be carefully designed in relation to the character and setting of the listed building. However, taking into consideration the*

minimal separation space between the two glazing panes and the fact that the rooflights are less conspicuous than the general glazing, the proposal is not considered to be significantly detrimental to the setting of the listed building”.

5. Planning Policy

- 5.1 Section 16(2) of the Listed Buildings Act 1990 (Planning (Listed Buildings and Conservation Areas) Act 1990)
- 5.2 National Planning Policy Framework (NPPF)
- 5.3 The Welwyn Hatfield Borough Council Local Plan 2016-2036 (October 2023) (Local Plan)
- 5.4 Supplementary Design Guidance 2005 (SDG)
- 5.5 Welwyn Garden City Conservation Area Appraisal 2007

6. Site Designation

- 6.1 The site is within the Sherrards ward of Welwyn Garden City.

7. Representations Received

- 7.1 The application was advertised by means of a press advertisement, neighbour notification letters and site notice. In total, 58 representations have been received, comprising 58 letters of support. All representations received are published in full on the Council’s website and are summarised below:

- Upgrade is well overdue.
- The school isn’t a museum, it is a functioning school.
- The school looks terrible.
- Sympathetic restoration would provide better educational conditions and enhanced security for staff and pupils.
- New windows would be more energy efficient.
- Disproportionate amount of school’s budget spent on energy costs because of the existing poorly performing windows.
- New windows and doors would ensure the school can function in the future.
- The building has inefficient thermal performance.
- There is a financial impact to the school with inefficient thermal performance.
- To refuse the application would be counter to WHBC's climate change strategy.
- The school is spending a disproportionate amount of tax payers' money on heating
- Children that are attending this Local Authority school are being disadvantaged compared to similarly protected schools nearby.
- The original windows are beyond their usable life.
- Existing doors are heavy and hard to open.
- Significant benefit for children and the public outweighs any alleged harm to the building.
- The existing single glazed windows break easily.
- Were the windows ever designed to last as long as they have?

8. Consultations Received

8.1 The following have responded advising that they object to the proposal:

- Historic England
- Place Services (Conservation Advisor)

9. Analysis

9.1 The main issue is the extent to which the replacement windows, doors and glazed screens to the external elevation and entrance lobby would preserve the special interest of the Grade II* listed building, and what public benefits can be attributed to the scheme in the overall assessment.

9.2 Templewood School is a Grade II* listed building. Ordinarily, works of repair or replacement of windows on a school building are likely to be permitted development. But the Grade II* designation of the school means that the proposed works require listed building consent.

9.3 As set out previously, Grade II* listed buildings are particularly important buildings of more than special interest. Nationally only 5.8% of listed buildings are Grade II*.

9.4 Within the area of Welwyn Hatfield Borough Council there are 25 Grade II* listed buildings. These include:

- The Flight Test Hangar, offices, fire station and control tower, British Aerospace, Comet Way, Hatfield,
- Sherrardswood School, Lockleys, Hertford Road, Welwyn,
- Northaw Place, Cooper's Lane, Northaw, Northaw and Cuffley,
- Shaw's Corner, Bibbs Hall Lane, Ayot St Lawrence, Welwyn, Ayot St. Lawrence,
- Welwyn Viaduct, Bessemer Road, Welwyn,

9.5 Section 16(2) of the Listed Buildings Act 1990 (Planning (Listed Buildings and Conservation Areas) Act 1990) requires that in considering whether to grant listed building consent for any works, the Council is required 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.

9.6 The importance of designated heritage assets are also set out in the NPPF. Chapter 16 of the NPPF sets out that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

9.7 Chapter 16, paragraph 203 of the NPPF states that in determining applications, local planning authorities should take account of:

'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

the desirability of new development making a positive contribution to local character and distinctiveness’.

- 9.8 Chapter 16, paragraph 205 of the NPPF outlines that, 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).
- 9.9 Chapter 16, paragraph 206 of the NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 9.10 Chapter 16, paragraph 207 of the NPPF requires “where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use”.
- 9.11 Chapter 16, paragraph 208 of the NPPF requires “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.
- 9.12 Policy SADM15 of the Local Plan is consistent with the NPPF. Policy SP11 of the Local Plan also acknowledges that the protection, enhancement, and management of the environmental, ecological and historic assets within the borough, will be sought commensurate with their status, significance and international, national and/or local importance.
- 9.13 Paragraph 12.36 of the Local Plan notes that “by their nature, heritage assets and the wider historic environment are a finite resource that are socially, culturally, economically and often ecologically important. Therefore, their conservation and preservation is an important consideration within the planning process. This is recognised within specific legislation and national planning policy which establish the desire and intent to preserve and conserve heritage assets and the historic environment according to their relative significance. However, change at various scales will occur within the borough in order to meet social, economic or environmental needs and to ensure individual heritage assets can continue to make a social, cultural and economic contribution. It is important that such changes avoid creating harm to heritage assets and the historic environment, or at least mitigate that harm to an acceptable level when considering the significance of the heritage asset and historic environment and the benefits that change would bring. SP11 and SADM15 carry forward this intent and approach within the Local Plan”.

- 9.14 Where potential harm to a designated heritage asset is identified, it needs to be categorised as either less than substantial harm or substantial harm in order to identify which policies in the NPPF and Local Plan Policy SADM15 apply. The PPG states that within each category of harm, the extent of the harm may vary and should be clearly articulated (Paragraph: 018 Reference ID: 18a-018-20190723).
- 9.15 Notice of an application for listed building consent must be given to Historic England in respect of works to a Grade II* listed building. Historic England have raised an objection to the proposal. The initial response of Historic England is as follows:

“Templewood Primary School was constructed in 1950 and is a major building in the historic of English schools in the 20th century. Its form of construction and use of materials were innovative and it’s architecture groundbreaking in that it placed the need for a creative learning environment for pupils at the heart of the design. This might seem a somewhat obvious ambition for any new school, but at the time it was a radical break with the tradition of more formal institutions which had emerged in the Victorian era and Templewood was very much a product of the progressive and even utopian ideals that underpinned the creation of the welfare state immediately after the Second World War. The school stands as a remarkable, highly influential and largely intact monument to that moment in British history which is reflected in its listing at grade II, placing it in the top 5.8% of listed buildings nationally.*

Historic England recognises that the construction of historic buildings can sometimes present challenges to their operation, particularly as regards their thermal performance and that this is often especially pronounced in those of non-traditional construction, such as buildings of the later 20th century. Conserving what makes historic building special is important, but we are also keenly aware that they need to be capable of sustainable use and this is perhaps rarely more the case than with schools, where they were built for a specific purpose and may not be readily adaptable to another use.

In the case of Templewood there does appear to be a need to improve the thermal performance of the building and the applicant has looked to the windows as a route to improving this. The use of windows is important in the architectural composition and apart from some which have been changed the majority appear to be original to the building. Changes to the windows could be an important part of overall improvements in the building’s performance, but their replacement raises the prospect of a significant amount of original historic fabric being removed and in the possibility of changes to the appearance of the school.

Given the importance of the listed building we are concerned by this but are also very much of the view that there is potential to improve the thermal efficiency of the building (which might even involve the windows) and are keen to help the school achieve this. However, understanding the historic and architectural significance of the school is essential to give informed advice and allow the Council to ultimately determine the application. So important is that that the National Planning Policy Framework (NPPF) requires the applicant to describe the significance of listed building and provide sufficient information to enable an understanding of the potential impact of the development on the it (paragraph 200).

The documents submitted with the application do not include any information on the significance of the listed school and so at present the application does not satisfy the requirements of the NPPF. However, we understand a heritage appraisal has been produced by Alan Baxter associates which contains a great deal of highly helpful information about the

historic significance of the building including an analysis of the contribution the existing windows make to that. It would be hugely helpful if that document could be submitted.

Beyond this, the NPPF states that ‘clear and convincing justification’ should be made for any ‘harm’ to the significance of a listed building and that ‘great weight’ should be given to the conservation of listed buildings irrespective of the level of harm caused (paragraphs 205 and 206). This weight given to conservation and the justification for harm should be especially convincing where harm to buildings of a high grade of listing is concerned, as is the case here. On the basis of the information accompanying the application we consider there is likely to be harm to the historic and architectural significance of the school resulting from the proposed works.

It is clear to the applicant that the thermal performance of Templewood school needs to be improved, but as harm to its significance could result justification is required, including information on the effectiveness of proposed improvements, the range of options by which they might be achieved and how they fit with alternative and additional measures. To this end we would always recommend an applicant takes a considered ‘whole building’ approach to assessing the potential for improvements, looking at the performance of the building as whole over a period of time and the full range of options for improvement. This is not only about making a case for improvements, but also gives the applicant information on how they will perform and how effectively. At present the application contains little such information on the building as a whole and even for the proposed windows other options are mentioned but no detail given. We would again suggest this does not satisfy the requirements of the NPPF but more than this does not allow a full assessment of the situation from which we might be able to advise the Council on this application, but also assist the school.

In conclusion, we have considered this application in terms of the NPPF and are concerned that the proposals could result in harm to significance of the listed building in terms of the NPPF, paragraphs 205 and 206. As described above, paragraph 200 of the NPPF requires applicants to produce details of the significance of the listed building and also of the works proposed in order to allow full assessment. This information is lacking, so on that basis alone it fails to satisfy the requirements of government policy and we could not support the application. However, we would like to offer detailed advice and engage with the applicant to achieve a positive outcome for the school and this information is necessary for that purpose.

It is the recommendation of Historic England that the proposed works could result in harm to the significance of the grade II listed building. The information submitted with the application does not satisfy paragraph 200 of the NPPF and more is needed to establish the significance of the listed building as well as further details of the works proposed in order to allow full assessment. At this stage we consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 200, 205 and 206 and would not support the granting of consent but recommend the Council secure additional information as described above. Following this we would be happy to advise the Council further and engage with the applicant to achieve a positive outcome for the school”.*

- 9.16 In addition to the objection from Historic England, the Councils Conservation Advisor at Place Services also raises an objection to the proposal. The initial response of Place Services is as follows:

“Pre-application advice pertaining to the replacement of the existing Crittall windows and doors with aluminium double-glazed units, and all soffit boards was provided on 5/02/24. As part of the pre-application advice a site visit was undertaken on 14/12/24. It was observed

that most of the windows and doors appear to be original apart from high-level windows above the links between classrooms and to the kitchen. It was also noted that the windows and doors appear to be in a good condition; some of the windows and doors have lost their original ironmongery, a few windows have broken glass and many of the frames would benefit from sanding down and repainting.

Historic England's guidance on Traditional Windows, Their Care, Repair and Upgrading includes five general approaches to the repair or replacement of windows within a listed building (see pages 62-63). Of these five approaches item one is considered the most relevant to this application, it states: Where historic windows, whether original or later insertions, make a positive contribution to the significance of a listed building they should be retained and repaired where possible. If beyond repair, they should be replaced with accurate copies.

The windows are considered to make an important contribution to the significance of the listed building. From the observation on site, the windows are in a good condition, with some requiring a general overhaul. Therefore, in accordance with best practice guidance produced by Historic England, the existing windows should be retained and repaired. If it can be demonstrated that the windows are beyond economical repair, which would need to be clearly demonstrated through a comprehensive condition survey, then there may be scope for their replacement. Even if this was the case, the replacement windows would need to be accurate copies to preserve the significance of the listed building. However, the loss of the historic windows would inevitably result in some degree of harm to the significance of the listed building.

As stated above, during the site visit undertaken in December the windows and doors appeared to be in a good condition with some requiring general overhaul and repair. The proposal lacks any evidence to justify the removal of the existing windows. The loss of the existing original windows and doors would result in 'less than substantial' harm to the significance of the listed building making paragraph 208 of the NPPF relevant. The proposal fails to follow best practice guidance set out by Historic England and lacks any supporting information to justify the identified harm. The proposal therefore fails to satisfy the requirements of paragraph 206 of the NPPF which requires clear and convincing justification for any harm to significance.

It is proposed to replace the windows with 'Crittall W20 system' but there is no detailed information regarding the replacement windows such as section and elevation drawings. Notwithstanding the concerns regarding a significant loss of historic fabric, I cannot assess the potential impact the proposed windows would have on the significance of the listed building due to the lack of detail. Furthermore, no heritage statement has been submitted so the application fails to satisfy paragraph 200 of the NPPF.

I acknowledge that there are concerns regarding the thermal performance of the building. However, as identified by Historic England in the advice note (dated 3/04/24) a whole building approach should be considered. There are also ways of improving the thermal performance of the existing windows by installing secondary glazing. A trial installation of secondary glazing has been undertaken (this was also observed during the site visit carried out during February) which was considered a satisfactory method of improving thermal performance and preserving the significance of the listed building. Most windows and doors have sufficient space in the reveals to accommodate secondary glazing.

Whilst secondary glazing may not achieve the desired aesthetic internally; it would ensure that the original windows are preserved in situ, whilst also improving the thermal performance of the building.

It should also be noted that whilst the windows and doors are in a generally good condition, the pre-cast concrete cladding is showing signs of deterioration as it has passed its designed lifespan. These repairs should be addressed through a Listed Building Consent (appropriate repairs would likely be supported). The listed building has a modular construction, and therefore all the individual elements such as the steel frame, cast concrete panels and windows were all designed as a set piece, which are connected to one another for ease and speed of construction on site. There are concerns that removing the windows would damage the surrounding panels or steel frame due to the way they are fixed together. There are concerns that the removal of the windows and doors could exacerbate the already compromised condition of the concrete panels due to the way they are affixed to one another and cause additional and unnecessary damage. There is potential for the proposed windows and doors to have an adverse impact on the remaining historic fabric.

- 9.17 It is the professional view of Place Services that the proposal would result in harm to the significance of the Grade II* listed building through the loss of the original windows and doors which are of significance. They cannot support the principle of replacing the windows due to the lack of evidence and justification and there is no information regarding the proposed replacement windows so that an informed decision regarding the potential impact on the replacement windows on the significance of the listed building can be made. They also raise a concern that due to the modular construction of the building, the removal of the original windows could cause damage to the concrete panels.
- 9.18 Following the receipt of the objections from Historic England and Place Services, the applicant was given the opportunity to submit additional information. This took the form of a Heritage Asset Statement dated 18 November 2014, a Historic Building Appraisal dated April 2014 and the applicants "statement of case" dated 25 April 2024.
- 9.19 Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework Paragraph 189). In doing so, applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance.
- 9.20 The Heritage Statement and Historic Building Appraisal submitted with this application are both of some age, being submitted as supporting information for the 2014 application for replacement windows (ref: N6/2014/2639/LB). Nevertheless, they adequately describe the significance of the building. The applicant also sets out a number of supporting scenarios in the statement of case. The statement of case considers that "*The windows cannot remain as they are because a) they have reached the end of their life and b) they are very thermally inefficient. So we have to work out what compromises to make in order to preserve the building and its character. It would appear to me very clear that an appropriate metal, slim profile re-fenestration would be the way to go*".
- 9.21 The applicant sets out that if any harm is identified by the Local Planning Authority, "*it would have to decide if such harm would be outweighed by public benefits*". Indeed, the majority of the 58 letters of support to the proposal mention that any heritage benefits of the Grade II*

listed asset should not outweigh the public benefits of the proposals to the children and the school.

- 9.22 Paragraph 157 of the NPPF says that the planning system should support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure. The environmental objective of sustainable development includes protecting and enhancing our built and historic environment but also mitigating and adapting to climate change, including moving to a low carbon economy.
- 9.23 Paragraph 164 explains that in determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in Chapter 16 of the Framework.
- 9.24 Public benefits could be anything that delivers environmental, economic and social benefits as described in the Framework. Addressing climate change is a fundamental priority if we are to secure our environmental, economic and social wellbeing. As set out in the response from Place Services, a detailed pre-application assessment was carried out between the LPA and with Hertfordshire Country Council (the landowner) in December 2023.
- 9.25 The applicant has submitted a feasibility study as part of the additional information. This feasibility study was commissioned by Hertfordshire County Council (HCC- the owners of the land). This study is published on this Council's website and is summarised below as follows:
- 4 options were considered.
 - Option A1 considered refurbishment and secondary glazing,
 - Option A2 considered refurbishment, secondary glazing and fabric repair,
 - Option B considered new Crittall T60 Windows
 - Option C considered new Crittall W20 Windows
- 9.26 It was the conclusion of this report that the high capital and whole life costs of both Crittall T60 windows and Crittall W20 (the latter being proposed as part of this application) “do not yield significant benefits in terms of annual savings in heating bills or reduction in carbon emissions”. It concluded that Option C is comparable to Option A2 in terms of whole life costs. That “Options B & C carry considerably more risk and are unlikely to be granted planning approval”. Option A1 does not deal with some of the long-term issues at the school, such as concrete repairs and asbestos soffits & fascias, which could be a missed opportunity.
- 9.27 It was the conclusion of this report that Option A2 - the refurbishment, secondary glazing and fabric repair offers “the best compromise in terms of cost, risk and aspirations”.
- 9.28 This application has not been submitted by HCC, it has been submitted by a local resident with Ownership Certificate B signed on the application form to identify HCC as the landowner. The applicant has decided to pursue Option C -removal of the existing original windows and replacement with new Crittall W20 Windows.

9.29 This additional information was submitted to Historic England. It was assessed by a second Inspector of Historic Buildings and Areas. The second response of Historic England is as follows:

“Additional information has been submitted in support of this application. The submission comprises assessments produced to inform previous applications, in particular, a Historic Buildings Appraisal (Beams Ltd, 2014), and a Heritage Asset Statement (Artelia, 18 November 2014). It also includes the Design and Access Statement prepared in support of the replacement of windows in Barclay School - a school of the same period in Stevenage. A Feasibility Report (Artelia November 2023) and a Statement of Case prepared by the applicant, dated 25th April 2024 have also been included.

The Beams document provides an appraisal of the building’s significance, and we agree with its assessment of the relevance of the windows and their contribution to the overall significance of the school. These were produced and designed by Hills & Co - the engineering firm which also collaborated in the design of the prefabricated system - in collaboration with Hertfordshire Architect’s Department. Except from a few replacements in high level clerestory areas, the majority of the original windows remain.

Templewood School represents a high point of school design of the period; this is reflected in its listing at grade II, compared to other examples - Barclay, referenced above for example, is only listed at grade II. This means that considerable weight should be given to its conservation - as mandated by paragraph 205 of the NPPF.*

Justification. The statement of case submitted by the applicant brings together a number of consultations and examples of window replacements in other designated schools in England and Scotland, albeit these are largely grade II - or its Scottish equivalent - B listed. The feedback given from different consultees is unanimous on their recommendation for expert professional input; we agree with this assessment.

The Feasibility Options Report considers four possible options

- A1. Refurbishment & secondary glazing,
- A2. Refurbishment & secondary glazing with fabric repairs
- B. Full replacement with new Crittall T60 windows
- C. Full replacement with new Crittall W20 Windows, these latter are the ones proposed by the applicant

The conclusions of the report are that whilst option C (new Crittall W20) is comparable to option A2 (refurbishment & secondary glazing w/fabric repairs) in terms of whole life costs, options for replacement (B & C) carry considerably more risk to the building. This is because the windows are part of a bespoke system and there are concerns that removing the windows could damage the surrounding panels or steel frame due to the way they are fixed together.

According to this report, the U values of the building (the lower the value the better its thermal performance) would be most improved with option A2 (refurbishment & secondary glazing). However, gas costs per year would be slightly higher with option C (a difference of £500/year).

In terms of the report itself, the information is scarce in relation to the sources of information and its detail, such as what quality/standard of secondary glazing has been considered, or whether there are other alternative strategies that could be

implemented that could help improve the overall thermal performance of the building.

Whilst the additional information provides more clarity about the significance of the building and starts to look into a number of options to achieve the desired benefits, we consider this is not robust enough to satisfy the clear and convincing justification required for the high level of harm resulting from the loss of significant historic fabric, as mandated by national planning policy. Consequently, our position remains unchanged from our previous advice.

That is that whilst we recognise the potential to improve the thermal efficiency of the school - and that might even involve the windows - we are currently unable to support the proposals in their present form, given the harm to heritage and lack of robust justification for it.

We continue encouraging that a holistic approach is adopted here. A thermal envelope study would help better understand the buildings performance, consider a wide range of options by which this could be improved, their effectiveness and implications - to the building's fabric, appearance, maintenance, etc. This would help design a bespoke strategy, avoiding cumulative piecemeal alterations which would substantially detract from the building's significance. This is not unachievable, and we would be willing to offer detailed advice and engage with the school owners and the applicant on finding a positive outcome for the school".

- 9.30 This additional information was submitted to the Council's Conservation Advisor at Place Services. The second response of Place Services is provided, in part, as follows:

*"Following an increase in population within Hertfordshire due to migration from London and due to five new towns being created in the County, new schools were required to meet demands of the growing population. A programme of school building was initiated by the county council, but due to the limited materials and funding following World War II, new building techniques were considered. Resultingly, the Hills 8'3" system was employed; the system comprised of prefabricated sections to be attached to a standardised steel frame. This way, windows, doors, and walls could be factory made and assembled on site, allowing for ease and speed of construction. The modular form also allowed for different designs so schools could be constructed fit into their environments and respond to the needs of each school. The Hills 8'3" system was innovative and the group of Hertfordshire schools that employed this system became exemplary models for future school architecture and design (Michael Keith, *The Development of School Construction Systems in Hertfordshire 1946-64*, PHD; Thames Polytechnic London, 1983).*

Templewood was completed in 1950 (designed by Cleeve Barr and featuring murals by Pat Tew) and is a very good example of its type. The windows form an integral part of the modular design and are of high significance. The significance of Templewood Primary School is recognised through its statutory designation as Grade II listed building. Grade II* buildings represent just 5.8% of listed buildings which reflects their particular importance of more than special interest.*

Concerns regarding the replacement of the existing windows are set out within the advice letter dated 09/04/2024. All advice within the letter remains relevant and the loss of historic fabric would result in 'less than substantial' harm as per paragraph 206 of the NPPF.

It is proposed to replace the existing windows with the w20 Crittall system. However, there is no detailed information regarding the design, profile or arrangement of the proposed replacement windows. Detailed information including large scale section and elevation drawings showing the existing windows and comparatively the proposed windows would be necessary. Detailed information on the proposed replacement windows is fundamental to understanding the full impact of the proposal. Notwithstanding concerns regarding the loss of the original windows, it is not known how different or how similar the proposed windows would be in comparison to the existing windows so I cannot make a conclusive decision on the acceptability of the proposal.

As per paragraph 206 of the NPPF, any harm to or loss of, the significance of a designated heritage asset should require clear and convincing justification. The information submitted has not demonstrated that the existing windows are beyond economical repair. Furthermore, the Option Summary Table on page 6 of the feasibility Options Report 3 indicates that the replacement windows would not be vastly superior in U value or cost saving when compared to refurbishment of the existing windows. Therefore, the proposal lacks clear and convincing justification.

There are examples where some of the clerestory windows have been replaced with modern windows; when comparing the existing replacement windows to the original windows, in my opinion, it only demonstrates the impact replacement windows can have on the architectural interest of the listed building. The replacement clerestory windows have thicker frames and a less refined profile than the original windows, undermining the building's architectural interest. In addition, I do not consider the replacement clerestory windows to result in a piecemeal appearance given their localised, less prominent position and they would not justify wholesale replacement of all the original windows.

During the site visit in December, it was noted that secondary glazing could be bespoke made to match the glazing pattern and opening windows to minimise any visual impact. Most windows and doors have deep rebates which could accommodate the secondary glazing without encroaching upon the internal space and ensure that the secondary glazing would remain discrete. The secondary glazing would result in some visual change internally, but this would not amount to harm. Comparatively, the loss of the windows as proposed would result in a high level of harm due to the loss of historic fabric that is irreplaceable. Additionally, there is no information regarding the proposed replacement windows so I cannot make a judgement on their acceptability. Replacement windows have the potential to detract from the significance of the listed building due to changes in their design such as glazing pattern, frame profiles and proportions.

There are other means of improving thermal efficiency that would likely be less intrusive which have not yet been explored. A whole building approach should be considered.

In summary, the proposed loss of the window would result in harm to the significance of the listed building. There is a lack of detail regarding the proposed replacement windows, and they could potentially be more harmful if they are inappropriately detailed. The proposal would fail to preserve the special interest of the listed building, and Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 should be considered. With regards to the National Planning Policy Framework the level of harm is considered to be 'less than substantial' as per paragraph 208. Paragraphs 205 and 206 would also be relevant".

- 9.31 Following the second set of objections from Historic England and Place Services the applicant was given another opportunity to respond.

- 9.32 The applicant produced a new Statement of Case dated July 2024. This Statement of Case is published in full on the Council's website. In summary the document appraises Templewood Primary School against heritage values and their consequent heritage significance. This report concludes that "option 2", replacement with heritage glazing is the optimal option because it "has the highest benefit to heritage significance and is the most sustainable of the options under consideration". The document sets out that "the report goes on to clearly and convincingly justify option 2 by demonstrating its overwhelming public benefits and explaining how option 2 ensures continued long-term optimal viable use" (para 1.1.1).
- 9.33 This new Statement of Case was submitted to Historic England. It was assessed by an Inspector of Historic Buildings and Areas. The third response of Historic England is as follows:

"The Statement of Case issued by the applicant is a very helpful addition to the documents supporting the proposed works to windows and doors at the grade II listed Templewood School. In our earlier advice we commented on the lack of an understanding of the significance of the listed building displayed in the application documents and advised that a series of options for window improvement should be explored, but as part of a 'whole building' approach to the improvement of the school's thermal performance. The new information addresses some, but not all of these matters.*

The heritage impact assessment in the new Statement of Case and that produced by Beams Ltd. in 2014 (which is included as appendix A) are useful documents with much helpful detail. The Statement of case utilises the concept of heritage values in Historic England's publication 'Conservation Principles' to identify different types of value and special interest within the listed building. This is a valid and useful approach, but it is important that the different areas of significance established through such an analysis are brought together as a whole, rather than a granular approach which only focusses on details. The Beams report is more successful in achieving this and draws out the overarching importance of Templewood School as innovative in design and construction but also its crucial role in displaying the then-novel concept of 'pupil-centred learning' in its layout and architecture. The role of fenestration is important in this and was perhaps best described in the report by Alan Baxter Associates produced for the school in 2023, but which does not form part of the current application.

However, all these reports fail to give weight to the fact that the windows and doors are the original ones which have remarkably survived. This is perhaps an obvious statement but needs to be stressed. It is common to overlook, or indeed dismiss, the importance of the original fabric having survived in modern buildings, perhaps because artefacts constructed within living memory do not have the glamour of age or the resonance of being the work of past generations. But there is nothing in legislation, guidance or good practice in the conservation of listed buildings which supports this approach. We therefore do not accept the conclusions of the Statement of Case about the lack of harm to the historic and architectural significance of the school that would result from replacement of the windows. Simply by disposing of such a large amount of original historic fabric there will be a reduction in the heritage values of the building and harm to its significance.

In addition to this there is the potential for harm to the architectural significance of the building resulting from visual change to the windows. The Statement of Case (paragraph 5.4.2) claims that the replacement windows would 'not change the opening type' but no plans have been submitted to confirm this, or if the pattern of glazing would be the same or to what degree the detailed profile might alter and where.

Without detailed plans of the existing and proposed windows it is not possible to judge if there would be additional visual harm from the proposals. This means that the applicant has still not submitted complete proposal plans for the works for which they are seeking consent. This is a basic requirement of all applications and it is surprising the application was even registered without these plans.

In order to explore if this harm might be reduced, we asked for a range of three options to be considered. These were to fit secondary glazing to the existing windows, to remove the glass and fit new sealed units to the existing windows and to replace the windows entirely. The first two options could allow for the retention of the original window frames, but unfortunately the Statement of Case only includes detail of the practicality of installation and likely thermal performance of secondary glazing and of complete replacement. Again, none of these have been drawn to confirm the applicant's assertions, but the assessment does include some useful information on the relative effectiveness of the two options, indicating the improvements in efficiency of heating and reduction in thermal gain which double glazed units might bring.

In our earlier advice we recommend that assessment of the performance of the building and the potential for improvements should be examined as part of a 'whole building' strategy. This would look at the way in which the building is used, the effectiveness of the current heating system, the strengths and weaknesses of the existing fabric and the opportunities for improvement not only in terms of thermal performance but also its use. The importance of such a 'whole building' approach is not only to contextualise proposed changes which might affect its historic significance but also to give users of the building a full understanding of its performance and therefore its potential for improvement.

This application has not taken this holistic approach but focuses narrowly on the windows. As noted above, the report has demonstrated that improving the windows could lead to significant improvements in the thermal performance of the building. This was always likely to be the case, but it is unclear how effectively they will perform in the absence of an understanding of how the rest of the building functions and what improvements could be made. Without this whole building approach there is a danger the school is missing a major opportunity to achieve greater improvements, such as installing roof insulation (where most heat is likely to be lost).

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The significance of listed buildings can be harmed or lost by alteration to them and the NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of listed buildings irrespective of the level of harm caused (paragraphs 205 and 206). This justification should be especially convincing where harm to buildings of a high grade of listing is concerned.

Because the necessary plans of the proposed work have not been submitted the applicant's suggestion that there would be little or no visual impact from the replacement windows has not been demonstrated. Therefore, the potential for visual harm remains along with the demonstrable harm from the disposal of the existing windows. This would result in 'less than substantial' harm to the significance of the listed building, in terms of the NPPF paragraph 208. The NPPF requires the Council to 'weigh this harm against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. We would accept

that there is public benefit in improving the environment of the building and that this plays a role in maintaining it in its original and best use.

The request for basic survey and proposal plans of the new windows is not unreasonable. In fact, it is a fundamental requirement of any applicant to provide details to establish the nature of the proposed work and there seems no reason why the applicant in this case has not provided this information. It also means the application fails to satisfy the requirements of the NPPF paragraph 200. For this reason, we would strongly recommend the Council do not determine the application at this stage but require this basic information so the proposals for work to the listed building can actually be seen.

Should the Council be minded to grant consent despite this, we would recommend that a clear condition be applied that such details are submitted before any work commences and have to be approved by the Council's historic buildings advisors. An additional condition should require information on the doors, so the potential for adaptation and repair can be established. Only if this cannot be achieved should they be replaced to match the appearance of the original doors.

Historic England has concerns regarding the application on heritage grounds, in particular that the disposal of the original windows and the replacements would lead to 'less than substantial' harm to the significance of the listed building, in terms of the NPPF paragraph 208. In addition, the lack of basic survey and proposal plans of the new windows means the application fails to satisfy the requirements of the NPPF paragraph 200. For this reason, we would strongly recommend the Council do not determine the application at this stage but require this basic information so the proposals for work to the listed building can actually be seen.

Should the Council be minded to grant consent despite this, we would recommend that a clear condition be applied that such details are submitted before any work commences and have to be approved by the Council's historic buildings advisors. An additional condition should require information on the doors, so the potential for adaptation and repair can be established.

In determining this application, you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account in determining the application”.

9.34 This additional information was also submitted to the Council's Conservation Advisor at Place Services. The third response of Place Services is provided, in part, as follows:

“There are four fundamental concerns regarding this proposal which have been set out in detail in previous advice letters (dated 09/04/24 and 22/05/2024). Concerns are summarised below:

- 1. The proposal would result in the loss of the original windows and doors. The windows and doors make an important contribution to the special interest of the Grade II* listed building. The loss of fabric would amount to 'less than substantial' as per paragraph 208.*
- 2. As per paragraph 206 of the NPPF, 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting),*

should require clear and convincing justification'. The windows and doors appear to be in a good condition with some requiring a minor repair works, and the proposal lacks clear evidence (from a conservation perspective) to suggest that windows are failing and require wholesale replacement.

3. *There is no information regarding the proposed replacement windows (such as section and elevation drawings) so I cannot make an informed decision regarding the potential impact of the replacement windows upon the significance of the listed building. It is not known how different or how similar the proposed windows would be in comparison to the existing windows so I cannot make a conclusive decision on the acceptability of the proposal.*
4. *The pre-cast concrete cladding is showing signs of deterioration as it has passed its designed lifespan. Due to the modular construction of the building, there are concerns that the removal of the windows and doors could exacerbate the already compromised condition of the concrete panels due to the way they are affixed to one another and cause additional and unnecessary damage.*

The contribution the windows make to the significance of the Grade II listed school has been misinterpreted and understated. Paragraph 3.2.1.2 of the Statement of Case states that the windows were made by the same company that made the steel frame (Hills and Co). This demonstrates that the windows and doors are integral components of the Hills 8'3" modular system, holding equal significance to the steel frame. Furthermore, the Statement of Case references "A Hundred New Schools, School Building 1948-1954" published in 1954 which notes that the modular system advanced the process of standardisation by applying the same principles to the steel frame, wall partitions, and other components whereas, previously, standardisation had primarily been applied only to windows and doors, which were made off-site. This implies that the Hills 8'3" system, including the windows and doors, was therefore innovative by standardising all components and making them off site for ease and speed of construction as well as to reduce costs. The windows and doors are not of lesser significance because they were modular units made off-site as this was the entire concept behind the design of the Hills system. The group of Hertfordshire schools that employed this system became exemplary models for future school architecture and design.¹ Templewood is a very good example of its type, and the windows are of high significance and make an important contribution to its architectural and historic interest.*

The composition of the steel frame, pre-cast concrete panels and windows and doors have survived largely unaltered since the construction of Templewood School which is fundamental to the significance of the listed building. The proposed loss of the windows and doors would result in harm to the significance of the listed building. There is a lack of detail regarding the proposed replacement windows, and they could potentially be more harmful if they are inappropriately detailed.

The proposal would fail to preserve the special interest of the listed building, and Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 should be considered. With regards to the National Planning Policy Framework the level of harm is considered to be 'less than substantial' as per paragraph 208. Paragraphs 205 and 206 would also be relevant".

- 9.35 In the terms of the NPPF and Policy SADM15 of the Local Plan, both Historic England and Place Services have concluded that there would be harm to the significance of the Grade II* listed asset. This is 'less than substantial' harm. This harm must be given considerable importance and weight in the planning balance of this application because great weight must

be given to an asset's conservation. Both Historic England and Place Services also consider that the level of detail, particularly the lack of a comprehensive set of scaled drawings, means that they are unable to undertake a full assessment.

Level of harm:

- 9.36 Paragraphs 206-208 of the NPPF identify categories of harm. There is substantial harm and less than substantial harm. There are no other grades or categories of harm, and it is inevitable that the categories of substantial harm and less than substantial harm will cover a broad range of harm. It will be a matter of planning judgement as to the point at which a particular degree of harm moves from substantial to less than substantial, but it is equally the case that there will be a number of types of harm that will fall into less than substantial, including harm which might otherwise be described as very much less than substantial. There is no intermediate bracket at the bottom end of the less than substantial category of harm for something which is limited, or even negligible, but nevertheless has a harmful impact.
- 9.37 As required by Paragraph 206 of the NPPF, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. In addition, as required by Paragraph 208 of the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 9.38 There are very real issues with the apparent thermal inefficiencies with the aging windows at the school. These issues include inadequate working conditions for children and staff, the look of the windows being scruffy, the building not being fit for purpose and rising energy costs. These issues to be addressed represent a public benefit that should be given weight in any consideration for works that might affect the historic significance of this Grade II* listed building.
- 9.39 Consideration is given to the fact that this is a Primary School and is in constant use for that purpose. However, in this case, the removal of the historic windows and fabric and their replacement with double glazed windows has not been convincingly justified. There is no 'clear and convincing' justification for this harm, or heavily weighted public benefits which would outweigh this harm. The conclusions of Historic England, Place Services and the information submitted as part of the applicant's submitted feasibility study do not point to the need for the wholesale removal of original windows and their replacement with double glazing. It is suggested that in many instances, repairs would be appropriate instead.
- 9.40 With this in mind, although the proposed development would provide some benefits, notably to address the thermal inefficiencies with the aging windows, it is considered that there are not convincing public benefits that would significantly outweigh the less than substantial harm to the significance of the designated heritage asset which would result from the development. In addition, there is no clear and convincing justification for the identified harm. The proposal would therefore fail to preserve the special interest of the listed building, contrary to Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990, it would fail with the requirements of the NPPF, and Local Plan Policies SADM15 and SP11.

10. **Recommendation**

- 10.1 It is recommended that listed building consent be **REFUSED** for the following reasons:
- 10.2 -The proposed development would materially harm the significance and character of the Grade II* listed building and whilst this is considered to result in less than substantial harm, public benefits to outweigh the identified harm do not exist. As such the proposal is contrary to SADM15 of the Local Plan; National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 10.3 -Insufficient drawings have been submitted with the application to adequately assess the proportions and detailed design of the proposed window replacements and how they would impact the significance and character of the Grade II* listed building. As such the proposal is contrary to Policies SADM15 and SP9 of the Local Plan; National Planning Policy Framework and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 10.4 The decision has been made taking into account, where practicable and appropriate the requirements of paragraph 38 of the National Planning Policy Framework and material planning considerations do not justify a decision contrary to the development plan.

Sarah Madyausiku (Development Management)
Date: 28 August 2024



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	Templewood Primary School Pentley Park AL8 7SD		1:5000	
	Development Management Committee		Date:	29-08-2024
	6/2024/0468/LB		Drawn:	R.Islam
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