

Local Listed Building Consent

(No.1)

- Secondary glazing replacement windows
 - Replacement glazing
 - Replacement glazed or part-glazed doors
- in Grade II Listed Buildings

GUIDANCE FOR THE USE OF THE LOCAL LISTED BUILDING CONSENT ORDER FOR ALTERATION OR REPLACEMENT OF WINDOWS AND GLAZED DOORS IN GRADE II LISTED BUILDINGS IN DEFINED CIRCUMSTANCES



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The guidance provided in this document is not intended to be exhaustive or to provide a template as windows vary so much in appearance. You may well require a bespoke design for your window or glazed / part glazed door. This document highlights some key principles and identifies basic terminology.

The Councils may update, amend or otherwise vary the content from time to time as required or in the light of experience of its use



1. The reason for the Order

What is a Local Listed Building Consent Order [“LLBCO”] ?

Local Listed Building Consent Orders allow local planning authorities to make a pro-active and blanket grant of consent for listed buildings within a defined area.

The intention is that owners of those buildings would not have to make individual applications but would be able to proceed with the specified works, subject to any conditions that may be attached. They were first introduced within the Enterprise and Regulatory Reform Act 2013, to grant listed building consent for works of a predictable and repetitive nature, where a blanket order would reduce the bureaucratic burden on the local authority and owners of such buildings.

Whilst there are examples of LLBCO within the country, this is the first time that an order will be introduced over such a wide geographical area, covering a listed building stock of diverse historic and architectural interest, to allow improvement of the energy efficiency of certain glazed elements, with the aim of addressing the challenges of climate change.

The reasons for the implementation of the order are considered in full within the Statement of Reasons, a legal document required to accompany the order.

Babergh and Mid Suffolk District Councils have conducted two consultation exercises on the content and implementation of the order since November 2023. The content of the order has been amended as a result of the responses received during the consultation periods. Most significantly, the councils have decided to introduce a requirement for anyone intending to use the LLBCO to notify the council *before* they start the works. This is so that we can monitor whether the conditions are being applied correctly and to avoid the risk of harm to our listed buildings through misinterpretation of the order. This amendment to the process will effectively streamline and reduce the bureaucratic process of obtaining consent for works covered by the order (in comparison with making a listed building consent application), whilst reducing the risk of harm to the significance of our listed buildings.

This guidance is intended to provide clarification and guidance on the use, implementation and conditions of the order and give examples of windows and details of proposed works that would and would not comply.



2. What the Order can be used for

The full extent and conditions are included in the order. The following guidance highlights where the LLBCO applies and gives technical guidance on the conditions that apply.

CLASS A -FOR SECONDARY DOUBLE GLAZING THE ORDER APPLIES TO:

- All windows and glazed or part glazed doors in grade II listed buildings.

FOR REPLACEMENT WINDOWS OR REPLACEMENT OF THE GLAZING OF EXISTING WINDOWS FROM SINGLE TO DOUBLE GLAZING THE ORDER APPLIES TO:

- **CLASS B** -Timber windows and glazed or part glazed doors in extensions added to grade II listed buildings after the date of listing and where the windows/doors have been granted listed building consent.
- **CLASS C** -Timber windows and glazed or part glazed doors in grade II listed buildings that were installed after the date of listing and have been granted listed building consent.

3.0 WHEN THE ORDER CAN'T BE USED:

- for windows/doors in grade I and II* listed buildings and Scheduled Ancient Monuments
- for windows/doors in ecclesiastical buildings. This refers to buildings that are exempt because the ecclesiastical denominations operate their own form of listed building control. For a list please see: [Ecclesiastical Exemption | Historic England](#)
- For class B & C historic windows/doors in any listed buildings, or other windows/doors in place at the time of listing.
- For class B & C Alteration or replacement of metal framed windows or their glazing and windows/doors with leaded lights. Listed building consent will still be required for alterations to these windows.
- Unauthorised windows/doors



3. What the Order cannot be used for....



windows/doors in Grade I and Grade II* listed building



windows/doors in a Scheduled Ancient Monument



windows/doors in a Scheduled Monument



for Class B & C historic windows/doors in any listed building or other windows/doors in place at the time of listing



for Class B & C alterations or replacement of metal framed windows or their glazing and windows/doors with leaded lights. Listed Building Consent will still be required for alterations to these windows



the use of uPVC or other man-made materials for joinery and related details. Only timber is consented



the installation of double glazing with a total thickness of no more than 14mm in a window in the listed building, and 20mm in a modern extension to



the removal and loss of historic 'crown glass', 'float glass', 'leaded glass', or 'stained glass'



the creation of any new opening or the resizing of existing windows and/or glazed or part-glazed doors



the replacement of unglazed doors



the replacement of an existing window with a window of a different type



non-traditional opening methods, eg: tilt and turn, false sash



4. What you need to do to notify the local authority that you will be replacing or modifying windows using the LLBCO....

The LLBCO has a two-stage process with a simple notification required both before commencing and after completion of the works authorised by the Order.

You need to notify us at least 28 days *before commencing* that you are intending to carry out works qualifying under the LLBCO. Once the works have been completed you need to let us know within 28 days of completion.

There is an additional option for you to ask us to confirm that the works undertaken comply with the order by issuing a Statement of Compliance. There will be a fee for this Statement.

For all classes – pre-start notification

- Fill in and submit the form on the webpage
- Provide evidence that the windows or part glazed doors that you intend to alter or replace qualify under the order:
 - photos of each relevant elevation of the house clearly marking each window that you intend to replace or alter.
 - close up photos of each window from inside and outside with a clear description or reference of the location of each window in relation to the photographed elevations (e.g. numbered window 1, 2 etc).
 - description of the proposed works (within the notification form)

In addition:

For replacement windows under Class B & C

- **Provide the listed building consent reference for the pre-works modern windows, or (as relevant) the extension, within the notification form.**
- large scale joinery or manufacturers details of the windows, glazing or secondary that you intend to install.

You will receive an automatic email acknowledgement of your submission of the notification form through the website, providing you with a notification reference number. Additional photos and drawings need to be emailed separately to heritage@babberghmidsuffolk.gov.uk quoting the site address and form confirmation reference number you will receive via email following completion.

For those unable to complete the form online a downloadable PDF document will be available to print, which can be filled in and emailed to the above address.

The council will issue written acknowledgement of the receipt of the prestart notification statement within 3 full working days of its receipt. At which point you will be free to carry out the works.

For all classes – post completion

- Fill in and submit the form on the webpage
- Provide:
 - photos of each relevant elevation of the house clearly marking each window that you have replaced or altered.
 - close up photos of each window from inside and outside with a clear description or reference of the location of each window in relation to the photographed elevations (e.g. numbered window 1, 2 etc).

The council will issue written acknowledgement of the receipt of the completion notification statement within 3 full working days of its receipt.

Why are you asking for information before the works are started?

- A local listed building consent order grants listed building consent for certain specified works. The windows within the grade II listed buildings within Babergh and Mid Suffolk District are of wide ranging designs and details, and it would be impossible to specify the exact works that would be approved by the order for all windows in all listed buildings within both districts. By asking for the information up front we are able to monitor whether the conditions of the LLBCO are being applied correctly, helping to avoid misinterpretation or costly mistakes.
- Several of the responses received during the consultation periods inviting public and professional comment before the implementation of the LLBCO raised concerns with a post works notification process. They highlighted the potential for inappropriate works to be carried out, or for historic fabric to be lost, if there was no documentary evidence of the windows or doors that existed before the modifications or replacements authorised by the order were carried out. The requirement for both pre-start and completion notification enables the council to effectively monitor the proposed works before and after they are executed.
- The notification statements that works have been carried out using the Order will register within any land search conducted when selling the property. However, this will not act as confirmation that the works comply with the LLBCO. Only a Statement of Compliance from the council will act as written confirmation.
- This order will initially operate for three years, and the authority will monitor its use and success. The information contained within the notification statements will enable us to evaluate the content of the order, whether it is being applied correctly, and how often it is being used. This will help us decide how to continue with order in the future.



The Process Simplified with helpful links

In this way you will be able to quickly navigate your way through the process and move on to carrying out your proposed works where they comply with the requirements of the LLBCO.

You are thinking about replacing a window or a glazed / part glazed door in your Listed Building

the LLBCO only applies to Grade II listed buildings, so check the listing grade of your property. If it is Grade I or Grade 2* [known as grade 2 star], then the LLBCO does not apply and you almost certainly require listed building consent **before** you undertake the works.

click [here](#) to check

Look at the LLBCO to see if what you propose qualifies as being works consented by the LLBCO. read it carefully because there are a number of important requirements and restrictions that may mean what you hope to do is not allowed under the LLBCO.

Carrying out work to a listed building without first having the appropriate consent

If the works you propose do fall within one of the classes consented by the LLBCO then, you are required to give the Council at least 28 days prior notice of your intended start date.

We have provided an on-line Pre-Start Notification Statement process to make this easy for you

also see

**STEP
1**

on page 8

You are required to give the Council notice that you have completed the works under the LLBCO within 28 days of doing so.

We have provided an on-line Completion Notification Statement process to make this easy for you

..... and then you're done.

also see

**STEP
2**

on page 9

NOTIFYING The Council:

BEFORE STARTING

works under the LLBCO

Complete and submit the required on-line PRE-START NOTIFICATION STATEMENT [PSNS]. Just click the link below to get to Listed buildings and conservation areas, and then click Local Listed Building Consent Order - windows :

BABERGH: click **HERE**

<https://www.babergh.gov.uk/listed-buildings-and-conservation-areas>

MID SUFFOLK: click **HERE**

<https://midsuffolk.gov.uk/listed-buildings-and-conservation-areas>

To be able to carry out Works Under the Order
WHEN DO YOU NEED TO NOTIFY THE COUNCIL?

NO EARLIER
than



before

STARTING the WORKS

STEP
2

NOTIFYING The Council:

WHEN YOU HAVE FINISHED

works under the LLBCO

Complete and submit the required on-line COMPLETION NOTIFICATION STATEMENT [CNS]. Just click the link below to get to Listed buildings and conservation areas, and then click Local Listed Building Consent Order - windows :

BABERGH: click **HERE**

<https://www.babergh.gov.uk/listed-buildings-and-conservation-areas>

MID SUFFOLK: click **HERE**

<https://midsuffolk.gov.uk/listed-buildings-and-conservation-areas>

for Works Completed Under the Order


WHEN DO YOU NEED TO NOTIFY THE COUNCIL?

no later
THAN



after

FINISHING THE WORKS

 If you fail to satisfactorily complete the required steps **1** and **2** the works may not qualify as works consented under the LLBCO.*  



ACKNOWLEDGEMENT of Receipt from The Council:

By using the on-line 'Pre-Start' ^{STEP} [1] and 'Completion' ^{STEP} [2] Notification Statements, you will get from us - (i) an automatic acknowledgement of receipt, and (ii) a printable copy of the information you sent to us - both by return email after each step. That way you'll have the 'peace of mind' of knowing that we 'got' them safely, and you will have a record of the information you provided. You may wish to save these with your other important house documents.



5.0 Technical guidelines

5.1 Class A: Secondary Double Glazing



The secondary glazing is visible from the exterior, the natural finished timber frame of the secondary glazing has thick sections and has both a horizontal and vertical frame member subdividing the window. It is clearly visible from the exterior and at odds with the fine timber joinery of the existing window.



The only clue that this window has secondary double glazing is the visible meeting rail of the secondary glazing due to the viewing angle and the reflection of the glazing bars on the inner glass

Secondary double glazing is a very efficient way of improving the thermal and acoustic performance of windows. It normally involves a small number of fixing points and is reversible. It is therefore appropriate for all kinds of windows, particularly historic windows, including metal framed windows and those with leaded lights, which may not be able to be improved in any other way.

There are many types of secondary double glazing. The LLBCO is not prescriptive, and any method may be used, provided the conditions are met. These include (but are not confined to):

Condition a) *the secondary glazing is applied internally and is designed to minimise its visibility from the exterior of the building;*

To minimise the visual impact from the outside the amount of framing and subdivision of secondary glazing should also be minimised to that necessary for structural and opening purposes. The framing pattern refers to the pattern of the larger components of the window, such as the casement or box frame and stiles and rails of any opening sashes, rather than the number of panes in each sash defined by glazing bars. Please see illustration at Appendix A for further explanation.

Secondary double glazing will be less visible from outside if the thicker components, such as the frame, and meeting rails or stiles that frame any opening or removable glazing align with those of the main window.



Good example – This secondary glazing to a timber framed window with metal casements is held in place by magnetic tape



The same window from inside – The secondary glazing has been removed from the central and right-hand side casements. The secondary glazing on the left-hand side is barely noticeable

Condition d) no additional draft proofing measures are to be installed to the existing window, and ventilation measures shall be incorporated in the secondary glazing as necessary to avoid the build-up of condensation in the air space between the two;

If warm air gets into the cavity between the secondary glazing and the existing window, it can condense on the glass of the existing window. Condensation can accelerate the decay of timber joinery or metal framing. To reduce the risk of condensation it is important that the cavity is ventilated. Existing windows should not have draught stripping or be painted shut, so that the unsealed gaps around the sashes can provide this ventilation.



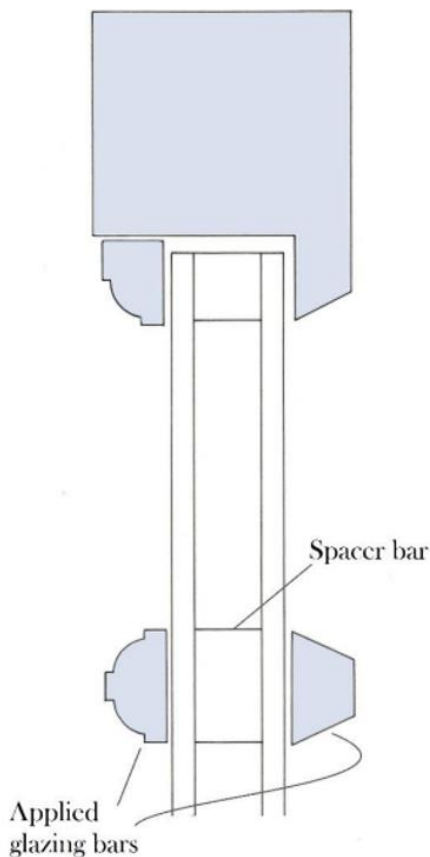
5. Technical guidelines

5.2 Classes B and C: Replacement Double Glazing

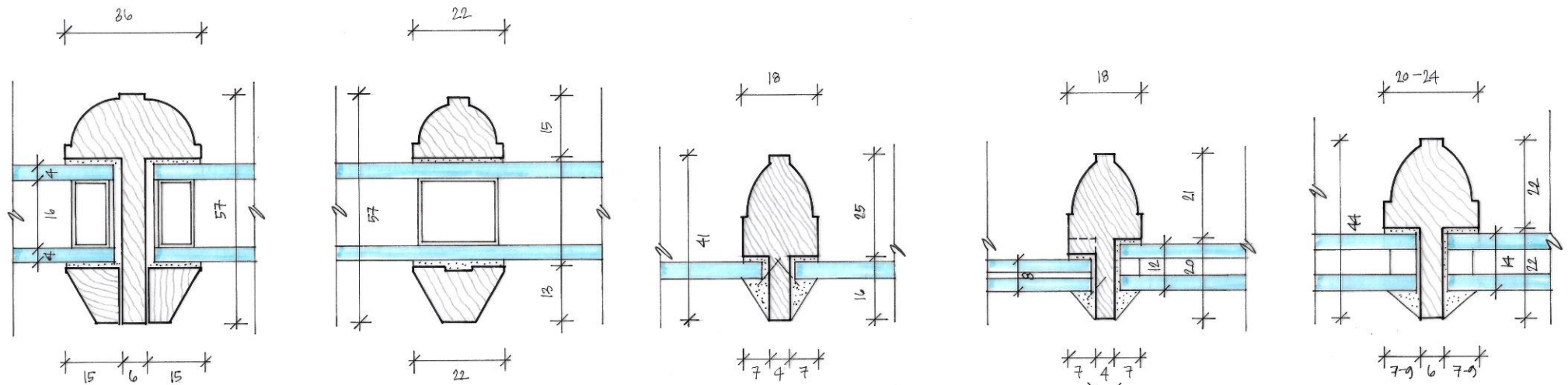


“Conventional” double glazed sealed units (nominally 24mm thick in order to comply with current building regulations) must be fixed with timber beading that secures the units and covers the edge seals, which are vulnerable to breaking down over time through UV exposure. The timber sections required are much larger than those of traditional timber windows. Any structural glazing bars need to be substantial enough to accommodate the sealed unit and the additional thickness and weight of two layers of modern glass. With standard double glazing, this means they have a much chunkier and heavier appearance in comparison with traditional timber joinery dating to the 18th and 19th centuries* As a result, until the advent of slim double-glazed sealed units, most modern windows designed to replicate traditional timber windows in listed buildings, or extensions added to listed buildings, were required to be single glazed.

It is impossible to emulate the fine sightlines of traditional timber glazing bars using conventional double glazed sealed units without applied glazing bars. These are separate sections of timber adhered to either side of the glass, typically of near triangular profile to the exterior and with ovolo or other decorative astragal moulding on the interior to emulate the profile of through, structural, glazing bars. Most modern window manufacturers now only offer applied glazing bars with spacers between the glass layers of the sealed unit as a standard glazing option to achieve the effect of multi-pane windows. They are clearly distinguishable from authentic structural glazing bars and are inappropriate for use in listed buildings.



Slim double glazing uses slimmer edge seals, higher performance gases in the cavity between the glass leaves, and finishes applied to the inner leaf, which enables thinner double-glazed units to have a similar or improved thermal performance to conventional double glazing. This means that they can be glazed into joinery section sizes that closely resemble traditional fine timber sections, utilise structural glazing bars, and can be retrofitted into existing windows, without (or with very minor) alteration to the existing joinery. Slim double-glazed units can be as fine as 11mm thick; vacuum glass is even thinner than slim double glazing. Both can be fixed with a glazing compound that can be decorated and has the appearance of traditional putty fixing.



TYPICAL STRUCTURAL GLAZING BAR IN STANDARD 24MM THICK DOUBLE GLAZED TIMBER WINDOW

TYPICAL APPLIED GLAZING BAR IN STANDARD 24MM THICK DOUBLE GLAZED TIMBER WINDOW

TYPICAL STRUCTURAL GLAZING BAR IN SINGLE GLAZED WINDOW - BASED ON LATE 19TH CENTURY PATTERN

VACUUM GLAZING SLIM DOUBLE GLAZING
RETROFITTED DOUBLE GLAZING IN STRUCTURAL GLAZING BAR OF SINGLE GLAZED WINDOW

TYPICAL STRUCTURAL GLAZING BAR IN NEW BESPOKE JOINERY USING SLIM DOUBLE GLAZING - MINIMUM REBATE INDICATED



This shows examples of conventional 24mm thick double glazing with both structural and applied glazing bars, single glazing and the same glazing bar with vacuum glazing and slim double glazing (with the depth of the rebate increased to receive the glazed unit). The glazing bar on the right shows a typical detail of a glazing bar in a new window that will comply with the condition of the LLBCO.



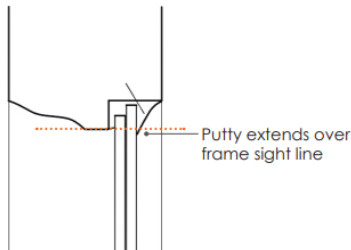
5. Technical guidelines

5.3 Classes B and C: Replacement Glazing in Existing Windows and Doors

Conditions

Replacing single glazing with slim double glazing or vacuum glass.

- The glazing should be no thicker than 14mm in the listed building and 20mm in approved extensions
- The sightlines of the window joinery should not be increased for example by increased putty width



- The depth of the glazing compound should match the existing, so that the modelling of the surface is maintained. The depth of the glazing rebate in modern timber windows may be increased by routing out the timber – as illustrated in the example detail on page 10.

Practically, it will be difficult to retrofit slim double glazing in windows with glazing bars that are less than 18mm thick and with glazing rebates of less than 16mm deep, or bars less than 41mm deep.



5. TECHNICAL GUIDELINES

5.4 Classes B and C: Replacement Windows and Doors

Classes B & C of the LLBCO allows for the replacement of qualifying windows and glazed doors with those incorporating slim double glazing or vacuum glass.

The LLBCO does not allow for alterations to the design of the window or alterations to the existing fabric to enable the installation of the window, other than standard making good and redecoration. The replacement windows should:

- Replicate the existing window design including the glazing bar patterns, opening type and joinery sightlines*.
- Glass thickness not to exceed 14mm in listed buildings, or 20mm to modern extensions to listed buildings
- Any glazing bars should be structural, not applied.
- The reveals of the windows should match the existing and any surrounding features such as sub cills, architraves and pentice boards should be retained.

*The depth of the window joinery can be increased to accommodate the increased thickness of the glass if this does not affect features surrounding the window, but the sightlines should match the existing.



Good example of replacement vertically sliding sash window with slim double glazing

The window is set into depth of the brickwork reveal by the same amount as originally intended



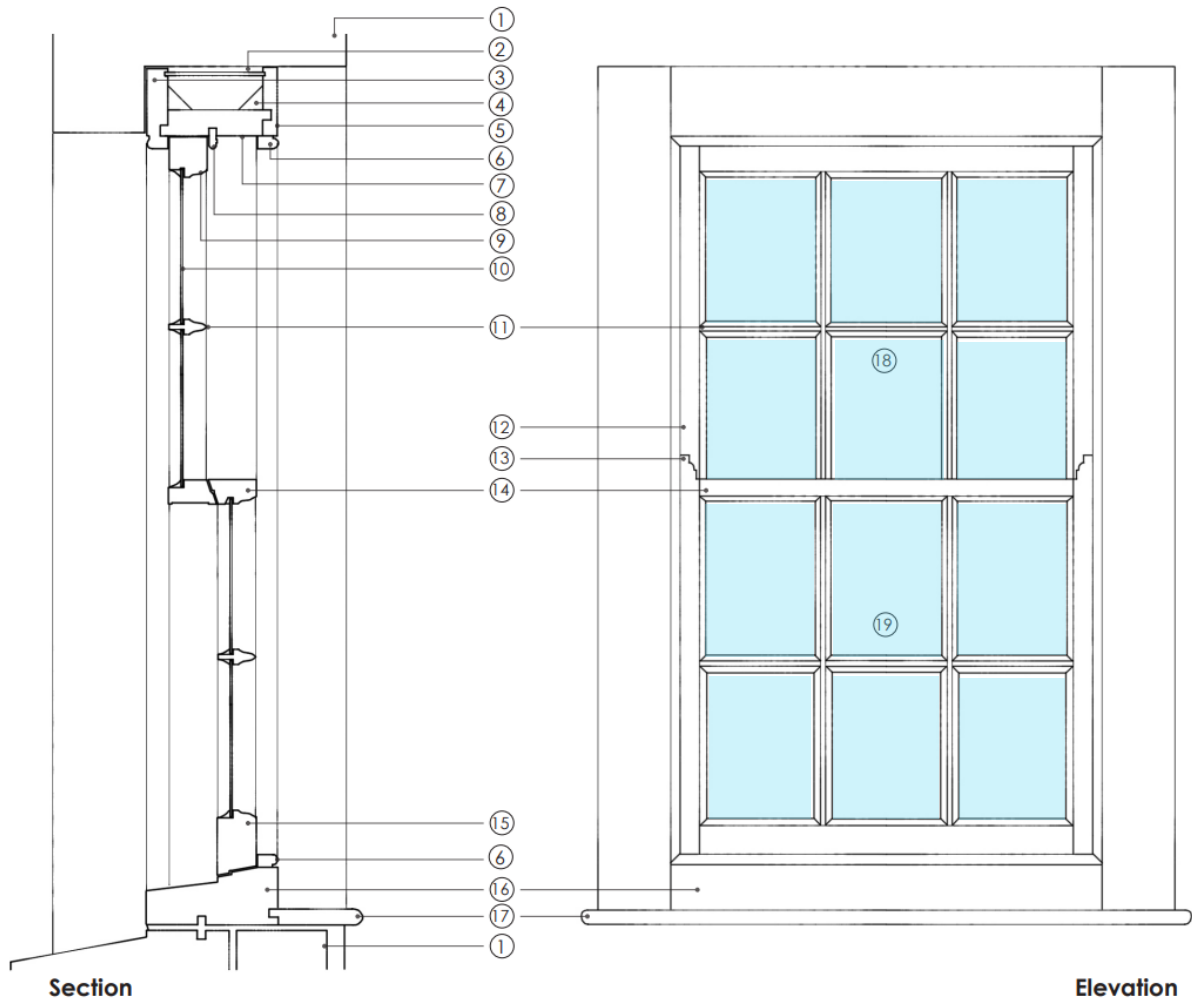
Good example of casement window with slim double glazing

The window is set in line with the weatherboard cladding replicating the historic detail. The windows fit between the timber framed structure, flush with the outer face, or on top of the frame, with the cladding fixed to the frame, butting up to the windows Both examples from ECOF guidance on Double Glazing in Listed Buildings

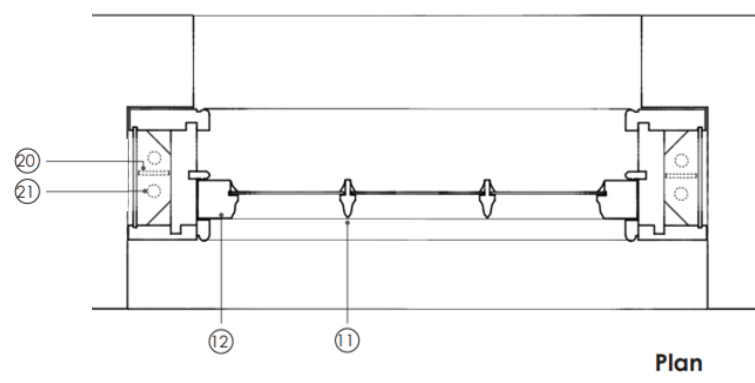




1. Appendix 1: Illustrated Glossary vertical sliding sash (internal elevation)



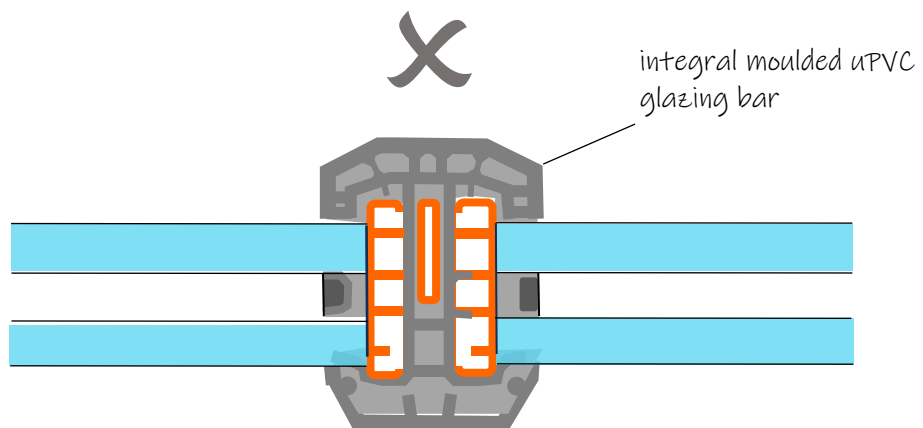
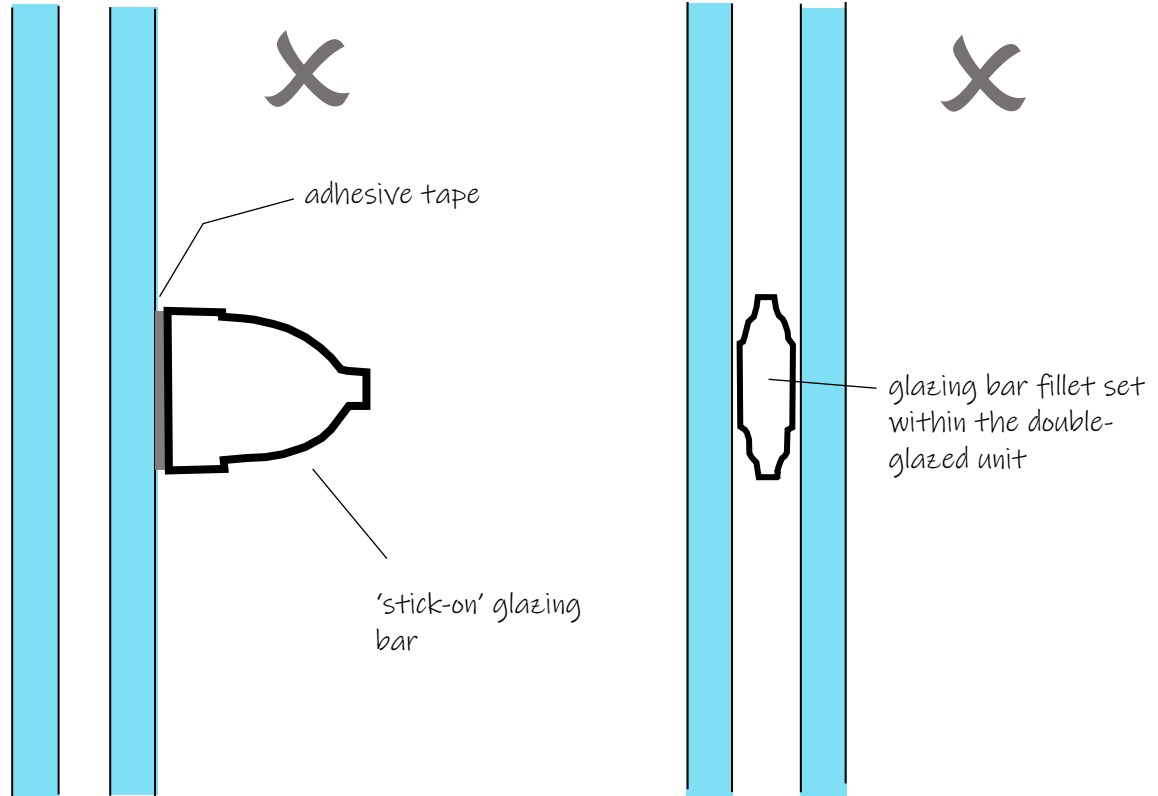
- 1. Surrounding structure
- 2. Back lining
- 3. Outer lining
- 4. Blocks
- 5. Inner lining
- 6. Staff bead
- 7. Soffit lining
- 8. Parting bead
- 9. Top rail
- 10. Glazing
- 11. Glazing bar
- 12. Sash style
- 13. Horn
- 14. Midrail



- 15. Bottom rail
- 16. Sill
- 17. Window board
- 18. Top sash
- 19. Bottom sash
- 20. Parting slip
- 21. Pulley weights



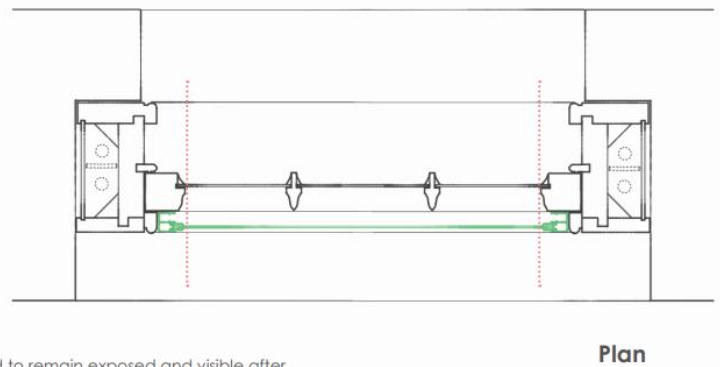
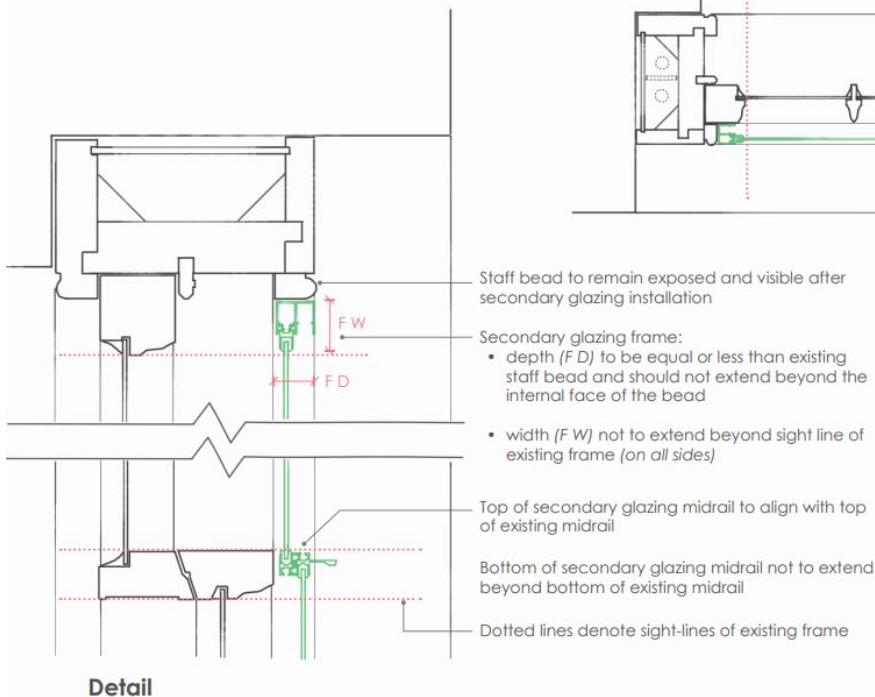
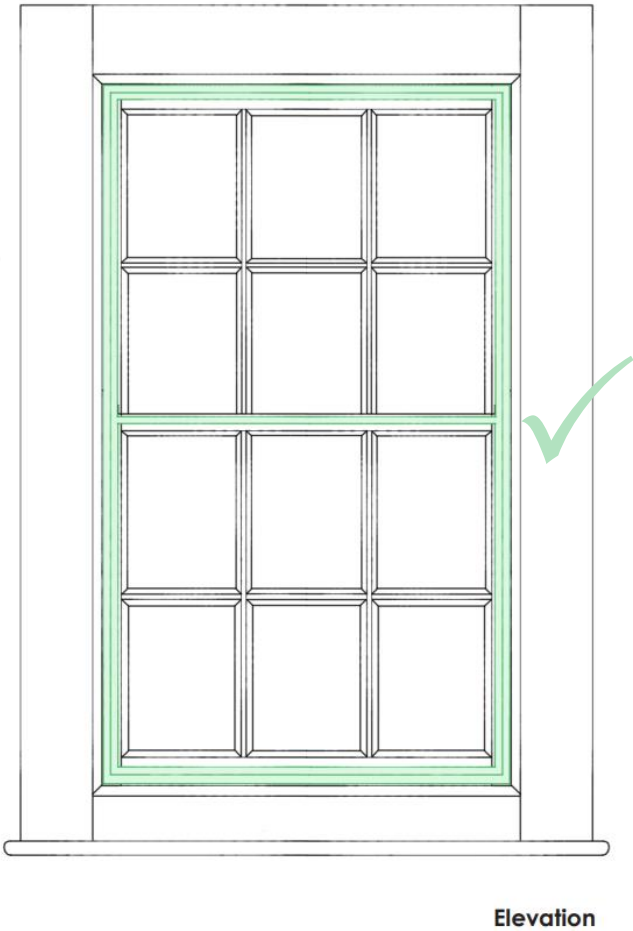
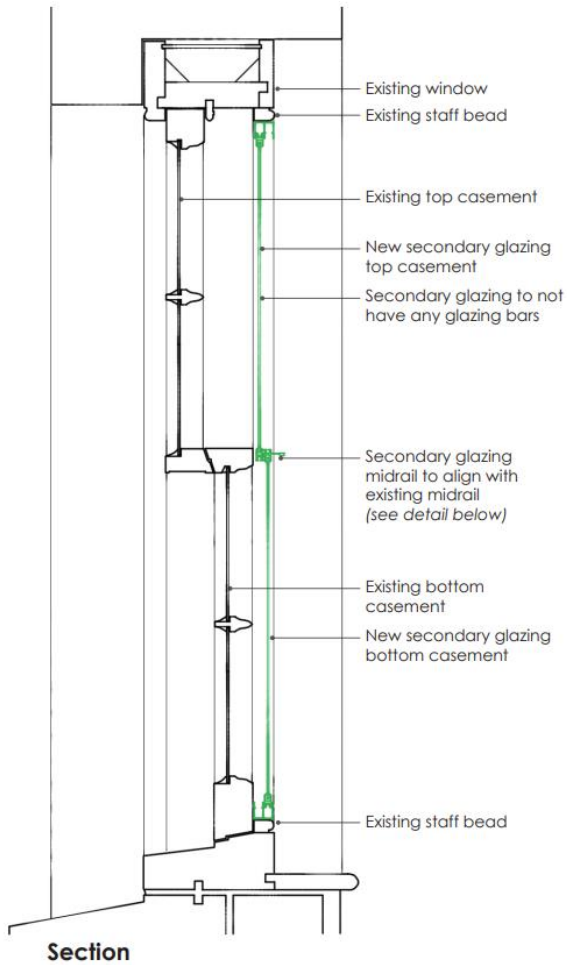
Appendix 2: Typical Modern, but Unacceptable Non- LBCO Compliant False Glazing Bar Details



not to scale

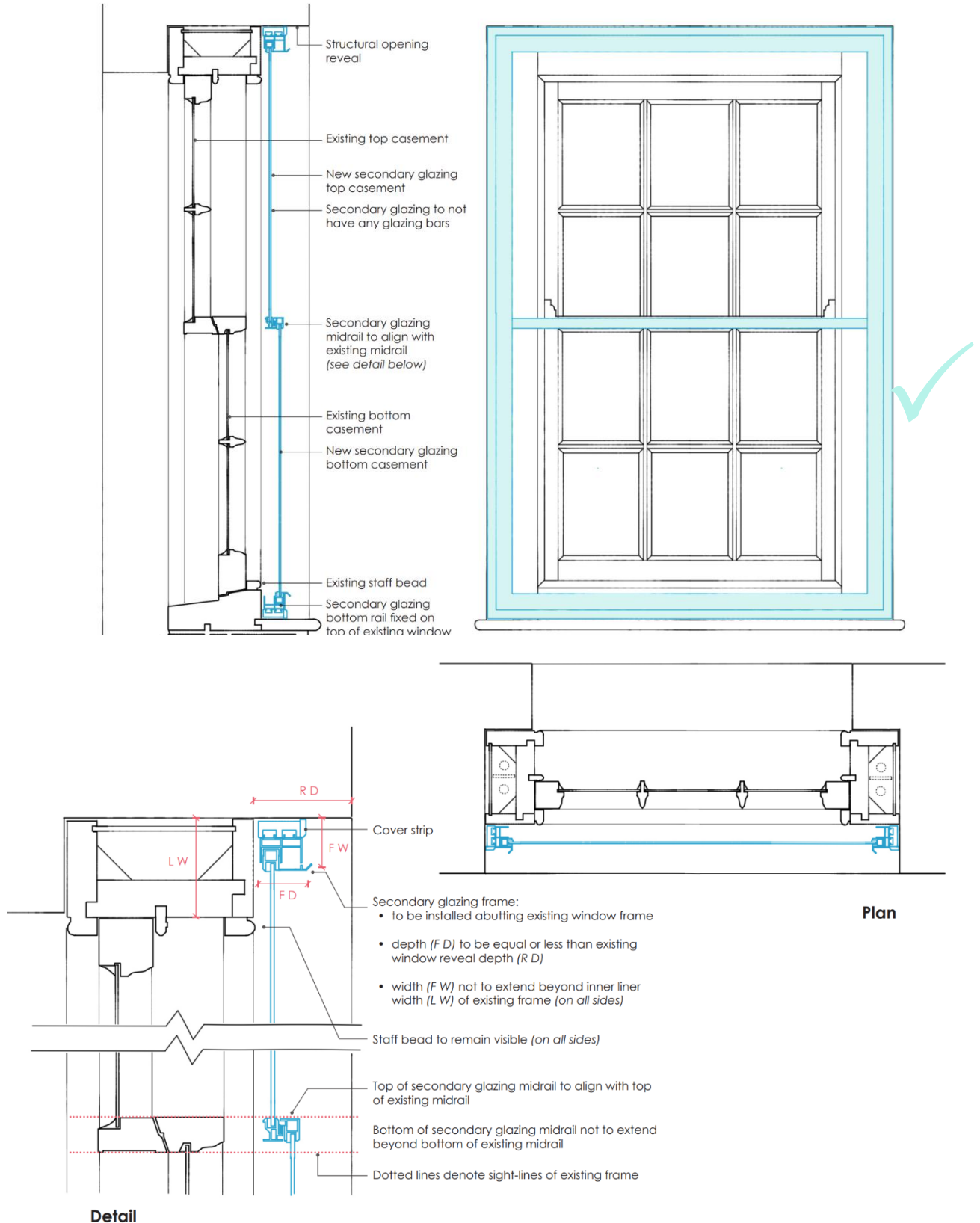


Appendix 3: Slimline Aluminium Frame Secondary Glazing Installed Within Depth of Existing Window Frame



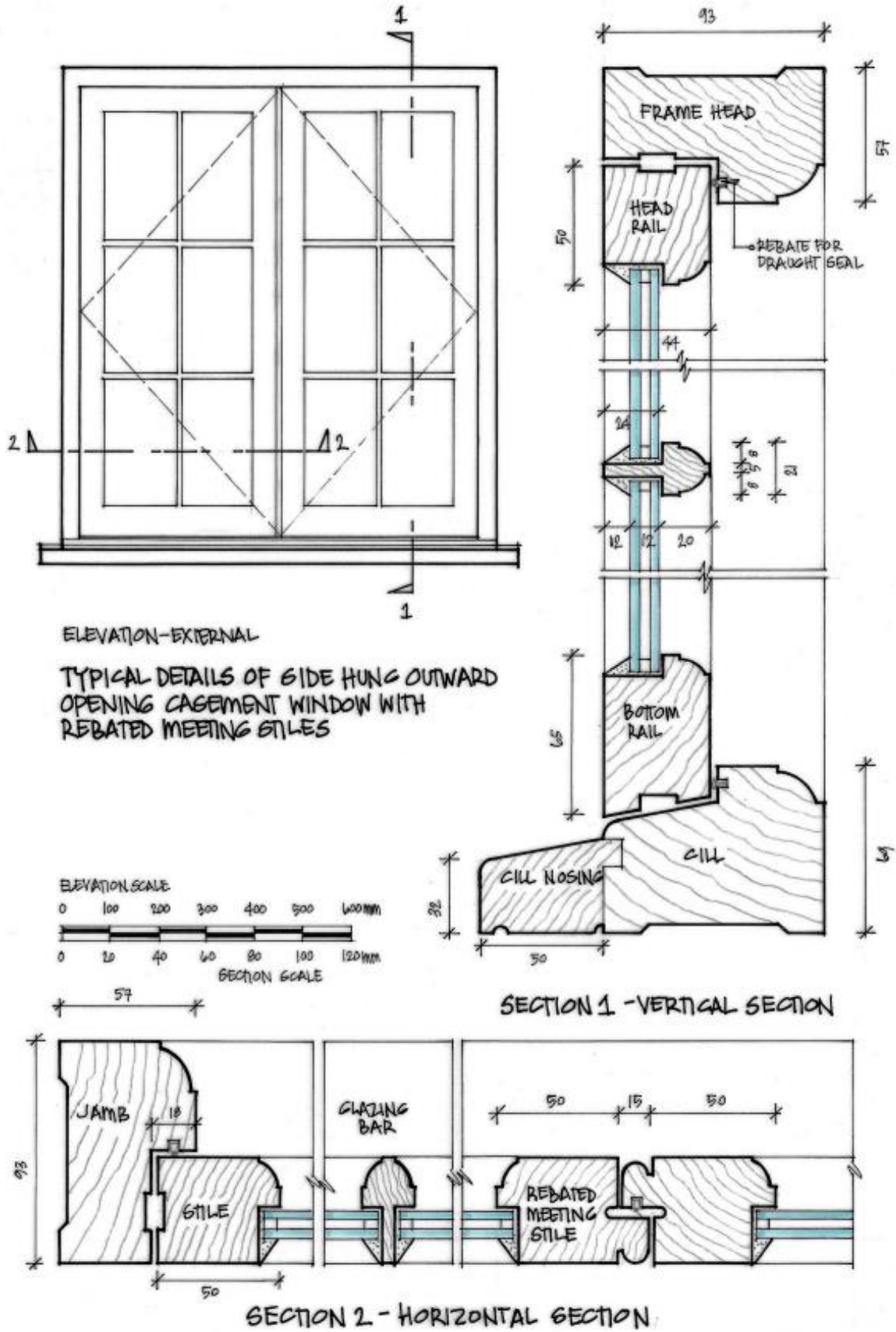


Appendix 4: Composite Aluminium and Timber Frame Secondary Glazing Installed Within Depth of Structural Reveal, Internally of Window Frame





5. Appendix 5: Example - Typical Side Hung Casement





Appendix 6: Early Types of Glass

text: <https://www.spab.org.uk/news/spab-scholars-plain-glass-overview>



SLAB GLASS

Slab glass is the earliest form of window glass and is produced by casting molten glass into moulds on a flat surface.


CYLINDER GLASS (or BROAD GLASS)

Molten glass is blown and swung to form a cylinder, both ends are cut off and the cylinder is then cut lengthways, reheated and flattened into sheets. The glass is then annealed slowly. Cylinder glass is often easy to identify as it has a distorted, ripple effect across the glass with air bubbles and small imperfections.





Lamberts Mouth Blown Restoration Glass – Cylinder Glass www.lamberts.de

 YouTube · LambertsGlas · 25 Oct 2017

CROWN GLASS

Crown glass was first produced in Europe in the 14th century, however it was not produced in the UK until 1674 and then production ceased in the mid-19th century. Crown glass is produced by molten glass being blown into a bubble and then spun into a disk, historically these disks could reach around 4ft in diameter. The glass is then cooled and cut into panes with the outer areas being the most desired as they were the thinnest. The central bullion or 'bulls-eye' where the rod was attached was then waste, however often appears in stained glass or leaded lights as decoration. Although crown glass allowed panes of glass to become larger, it was very expensive, and so leaded glazing remained popular throughout the 17th and much of the 18th centuries.

When trying to identify whether glass is crown glass, one should look for the curved sweeps within the glass, showing the marks of its production.



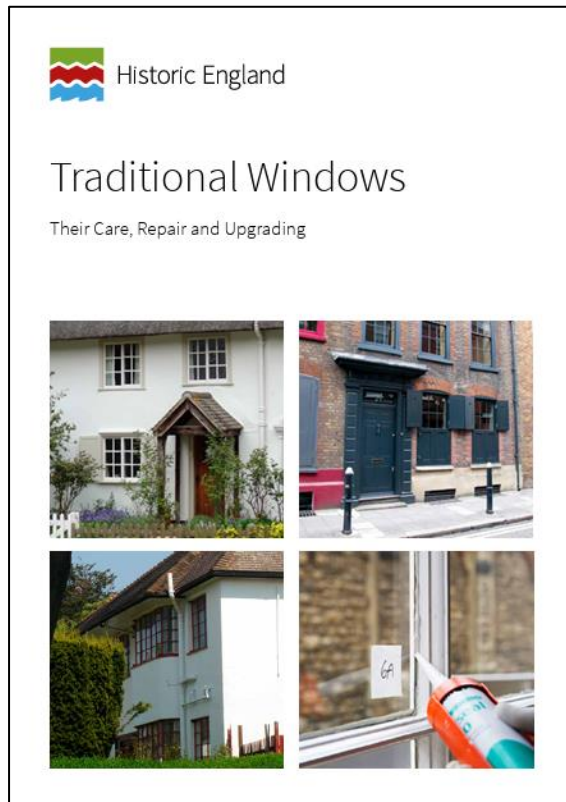


Mouth blown Crown Bullions - Mundgeblasene Glasscheiben - LambertsGlas - Glashuette Lamberts
www.lamberts.de

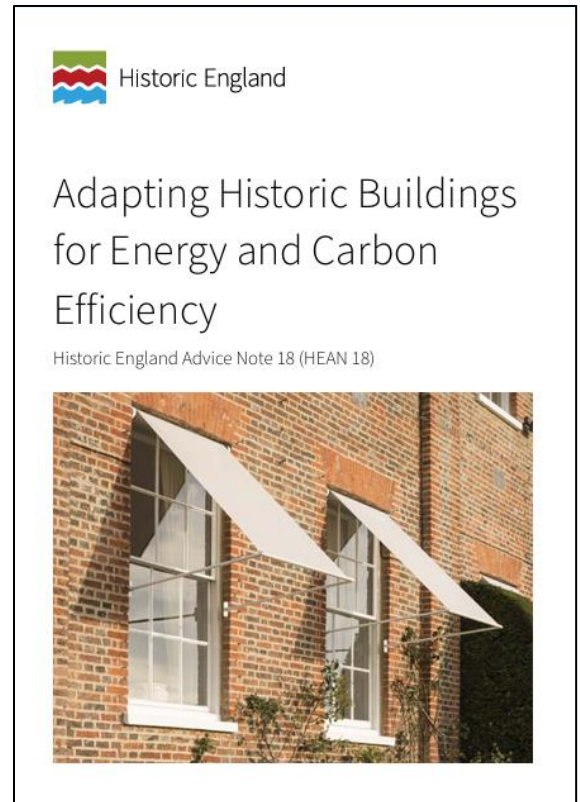
 YouTube · LambertsGlas · 8 Mar 2013



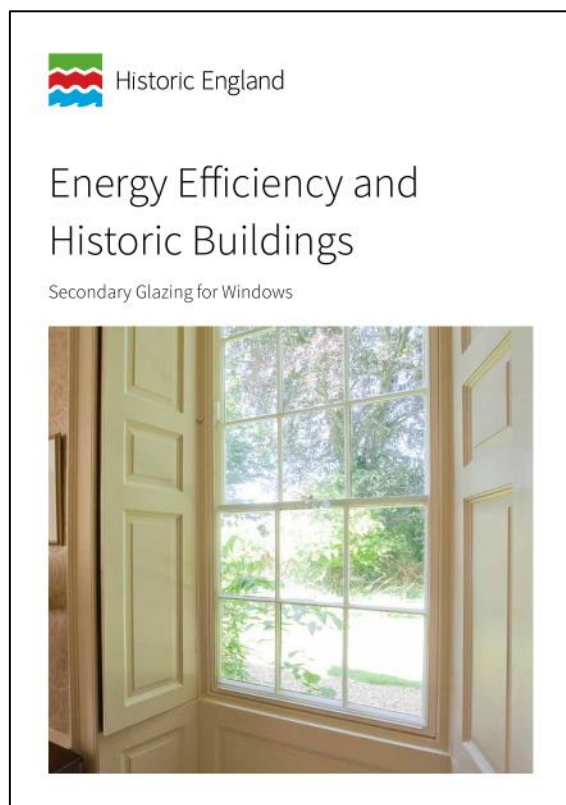
Appendix 7: Other Useful Reading



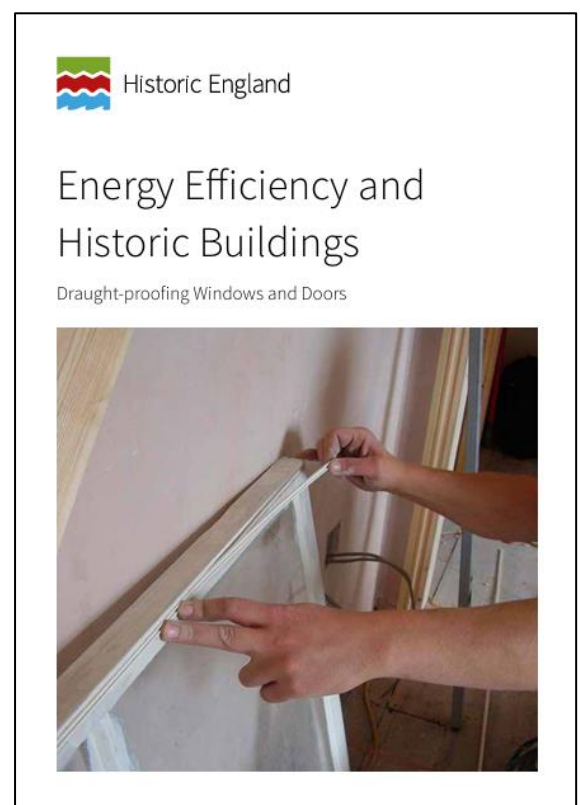
published 8 February 2017



published 18 July 2024



published 29 April 2016



published 29 April 2016

LOCAL LISTED BUILDING CONSENT (MID SUFFOLK) ORDER (No. 1) 2025

LOCAL LISTED BUILDING CONSENT (BABERGH) ORDER (No. 1) 2025

1st October 2025

**‘SPECIFIED WORKS’ to WINDOWS and GLAZED or
PART-GLAZED DOORS in GRADE II LISTED BUILDINGS
in ‘DEFINED’ CIRCUMSTANCES**

related documents

- a. The ORDER**
- b. STATEMENT of REASONS**
- c. GUIDANCE**



produced by:
the Heritage Team

Directorate of Place
Babergh Mid Suffolk District Councils