

Local Listed Building Consent

(No.1)

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

b. STATEMENT OF REASONS

Directorate of Place

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

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

‘SPECIFIED WORKS’ TO WINDOWS AND GLAZED OR PART-GLAZED DOORS IN ‘DEFINED’ CIRCUMSTANCES

STATEMENT OF REASONS [“SoR”]

Introduction

This Statement of Reasons provides reasoned justification for making a Local Listed Building Consent Order [‘LLBCO’] relating to the replacement or upgrade of windows to improve energy efficiency in listed buildings. This Statement therefore explains the rationale for proceeding with a LLBCO for the works to be consented and includes an assessment of the likely effect of the consented works on the special architectural or historic interest of the listed buildings to which the LLBCO would relate, alongside other relevant considerations. It applies equally to the identical Orders for Babergh and that for Mid Suffolk.

Background

Babergh and Mid Suffolk District Councils have declared a climate emergency and are committed to supporting Suffolk’s ambition to achieve carbon neutrality by 2030. The respective districts are also characterised by their rich cultural heritage with a total of over 6,000 listed buildings. The sheer number of buildings involved inevitably makes them a factor in meeting this challenge. In order to make a meaningful reduction in emissions, significant intervention is required whilst following statutory duties to preserve heritage. Striking the right balance between those two very important goals is vital. The LLBCOs do this.

LLBCOs allow local planning authorities to make a pro-active and blanket grant of consent for listed buildings within a defined area. The consequence 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. The benefits of this include efficiencies in reducing the need to make formal applications, and avoiding the costs associated with such applications. Therefore, drafting a LLBCO in the interests of improving the efficiency of listed buildings would also encourage more building owners to act proactively, rather than being deterred by the consent process.

The Councils are aware that LLBCOs relating to window works have been adopted elsewhere. This has provided an opportunity to review, and where possible improve upon, initiatives that have already been found to be acceptable by those authorities (but recognising the need to consider the potential impacts of the proposed works afresh and at a local level). This has set the basis for the LLBCOs that are now proposed, recognising that in respect of secondary glazing alone, substantial improvements to overall efficiency can be made through reducing heat loss (in some cases improvements in energy performance and noise reduction can exceed the use of double glazing).

A review of listed building consent applications granted over the last five years (2019-2024) has been helpful in identifying the utility of the proposed LLBCOs.¹ Window works are a common application type and are nearly always granted unless new windows are proposed that would involve the loss of historic fabric; conditions are sometimes required to clarify points of detail, however. In respect of secondary glazing in particular, there have been seven applications made that included such works and all were approved. Each consented application will have yielded significant environmental gains in meeting low carbon objectives but will have taken many weeks to determine with additional costs to the owner in the preparation of the application and to the Councils in determining them (at a financial loss where no application fee is payable).

Whilst the number of identified applications is relatively low as a proportion of the overall number of listed building consent applications received by the Councils, this does not diminish the significance of the public and private benefits to be derived. The Councils also have good reason to consider that uptake is likely to increase through the promotion of the LLBCOs and other low-carbon initiatives, combined with a generally improving public awareness of the need to make positive sustainable changes at home. The Councils have also previously undertaken a public consultation exercise regarding the prospective use of LLBCOs (and related Local Development Orders); the responses received were overwhelmingly positive, in principle.²

Review of Consultation Responses Received

A draft of the proposed LLBCO with Statement of Reasons has been subject to an eight-week period³ of consultation with the public at large, including owners listed buildings⁴ within the designated area, and other key stakeholders including Historic England. This process has informed the final drafting of the proposed LLBCOs to be adopted, alongside publication of this final Statement of Reasons.

In total, 49 responses were received.

Of these, 79.5% were submitted by owner-occupiers of a listed building and 20.41% by other interested parties. The 41 responses from owners of listed buildings where the property in question was within one of the districts divided into 53.06% within Babergh (26) and 30.61% (15) within in Mid Suffolk.

16.33% (8) were from respondents who stated that ownership or occupation of a listed building in Babergh or Mid Suffolk was not applicable.

Where respondents indicated ownership or occupation of a listed building (40) 90% related to a Grade II listed building. (5% related to grade II* listed buildings and 5% to grade I listed buildings. (2 apiece)

¹ Searching listed building applications relating to “secondary glazing” and “replacement windows”.

² 88% of the 242 respondents who replied agreed with the principle of introducing such tools.

³ Between Friday 16 May 2025 and Friday 11 July 2025 and (extended to 28 September 2025). The Local Listed Building Consent Orders) (Procedure) Regulations 2014 at S.4(b) requires a minimum 28-days website consultation period. The Council extended this to eight-weeks.

⁴ The Councils formally consulted the owners of listed buildings, where known, in both districts. The Local Listed Building Consent Orders) (Procedure) Regulations 2014 at S.4(d) requires the local planning authority to serve a copy of that notice on every person whom the authority knows to be the owner of a listed building in the area to which the order would relate and whose name and address is known to the authority. The Council contacted owners of listed buildings who had submitted a valid listed building consent since 1 April 2024 as the only reliable way of knowing with some certainty the current name of the owner of a listed building by its address.

A significant majority of respondents (77.5%) stated that they supported the proposed LLBCO. This suggests popular acceptance⁵ of the key principle that the Councils' are seeking to promote. Namely, the introduction of a measure that enables owners of grade II listed buildings to better improve the thermal efficiency of their homes without the need for listed building consent where this will not harm the character of that building

22.5% (11) of respondents said they conditionally supported the proposed LLBCO. Of the four that stated why they supported the LLBCO conditionally, the following points were raised.

- *Concern that the phrase "designed to minimise its visual appearance from the exterior of the building" used in the LLBCO when referring to the appearance of secondary glazing is too vague. The respondent believes this exposes the person undertaking such work to the unreasonable risk of the Council determining that the work undertaken does not comply with the requirements of the LLBCO. The respondent suggested the need for photographic evidence to be required in respect of the existing appearance (ie: pre-LLBCO work).*

The substantive point made is reasonable and highlights a wider question around risk management for owners of grade II listed buildings who wish to carry out works under the LLBCOs.

The primary risk arises from the fact that unlike carrying out development that requires planning permission without that permission, which is not an offence, carrying out 'unauthorised' works to a listed building is a criminal offence.

Any person who carries out, or causes to be carried out, any works to a listed building without listed building consent, where such works affect the character of the building as a building of special architectural or historic interest will, on conviction, be guilty of a criminal offence.

Prosecution can result in an unlimited fine and/or imprisonment.

The risks for the grade II listed building owner can therefore be summarised as:

- *The owner of the grade II listed building carries out works believing them to be 'consented works' under the LLBCOs only to find that at a later date that the Council, as local planning authority, determines they were not consented works.*

Unlike planning breaches (unauthorised development – Planning Act 1990) there is no limitation on the time within which enforcement action is possible for unauthorised works to a listed building where listed building consent was required. In response the Order has been amended to include the requirement to inform the Council of an intention to undertake work under the LLBCO. This notification must be by way of a Pre-Start Notice Statement. This affords the Council as local planning authority an opportunity to contact the owner wishing to carry out works if it clear that the proposed works do not constitute consented works under the Order. The Council is not however providing formal confirmation that the proposed works described in the Pre-Start Notice Statement are or are not consented works under the Order.

In addition the owner is able to contact the Council for advice before undertaking works in the normal way under its pre-application enquiry initiative. Therefore if an owner is uncertain there is a facility to secure such confirmation.

Moreover, as part of the LLBCO process the Council has introduced a voluntary fee paying 'Confirmation of Compliance' process once works have been undertaken

- *In such a circumstance the owner may be held to have committed an offence by undertaking work to a listed building without the appropriate listed building consent. Subsequent*

⁵ at least amongst the community of listed building owners that responded



enforcement may be complicated and if the 'unauthorised' works undertaken would not have received listed building consent this puts the owner at financial and reputational risk as well as what is likely to be considerable anxiety.

The pre-application enquiry process described above should provide an owner with comfort if they need it before proceeding.

- *People in the local area will probably be unaware that Consented Works are being undertaken to the listed building and may make a complaint to the Council or to the Owner. – The proposed Pre-Start Notification Statement requirement will put the information into the public domain and provide certainty and confidence to the community.*

In response the Council has introduced a voluntary site notice that will accompany its formal acknowledgement of receipt of a Pre-Start Notice Statement. The owner can therefore choose to display a notice on the property that explains that work is about to be undertaken to the building under the LLBCO. The details can then be viewed on-line.

- *The listed building owner may at a point in the future ,perhaps on seeking to sell the property, wish to evidence the works carried out were Consented Works .*

The Pre-Start Notification Statement and Completion Notification Statement provide some historic evidence of the action taken on the assumption that the owner believed the works would be / were carried out under the consent provided by the LLBCO. The option of seeking a Statement of Compliance from the Council enables a building owner to seek confirmation that the Actual Works fell within the scope of the consent available under the LLBCO. As this is an additional Council service a reasonable charge will be levied on such requests to cover the costs of inspection and verification.

The introduction of a Pre-Start Notice Statement requirement is consistent with Historic England advice at 4.4 of its 'Drawing up a Local Listed Building Consent order Advice Note 6.' which emphasises:

“An LLBCO could include provisions for advance notification to the LPA of the commencement of works consented under the Order, or for confirmation of their completion. However, care should be taken to avoid introducing requirements which undermine the process efficiencies the Order is designed to achieve.”

A requirement for notification after the works have been carried out is retained. In order to ensure that the LLBCO is being properly implemented the Council will undertake random inspections of properties as part of audit and verification process to inform its consideration at the end of the three-year life of the LLBCO.

Unlike other LLBCO's, such as that in Kensington and Chelsea, the Babergh and Mid Suffolk LLBCOs are not restricted to a specific and small part of the administrative area⁶ but are to be applied across the panoply of grade II listed buildings and across both districts. Our approach draws a balance consistent with the challenge of the climate emergency.

This means that within Babergh and Mid Suffolk the scope and range of building types and window types is likely to be far wider than those in an inner London, highly urbanised environment. Consequently the ability to de-risk work for those Owners seeking to carry out

⁶ Kensington and Chelsea's LLBCO relates to Grade II Listed Buildings in the Queen's Gate, Pembridge, and Holland Park Conservation Areas only.



work under the LLBCOs under the relevant Classes of the LLBCOs in our rural environment is better suited to also having a Pre-Start Notification system as it provides a basis for understanding the nature of works that are to be undertaken and establishes the 'as is' position. This provides the Owner with a degree of added protection provided the Proposed Works are Consented Works.

To further assist the Owner better establish whether the Proposed Works are likely to constitute Consented Works the LLBCOs includes illustrative examples, and these will assist anyone thinking of undertaking works under the LLBCOs to better understand some of the typical terminology and detail found.

In addition supporting Guidance has been produced to further explain the nature of what constitutes Consented Works and the factors to consider. This will be published on-line.

Moreover a system for on-line checking that Proposed Works do not constitute Consented Work/s in principle will be posted.

Relevant simple Pre-Start Notification Statement and Completion Notification Statement forms will also be published on-line to make the process as easy as possible,

- *LLBCO should go further to include Grade1 and Grade II* listed buildings*

Whilst such enthusiasm is understood, the Councils' are introducing the LLBCOs in respect of Grade II listed buildings only as a three-year trial in order that the overall impact⁷ of the initiative and its success in delivering the objectives underpinning the trial can be assessed and evaluated.

Depending on the results the LLBCOs may be made permanent, amended, extended to other grade/s of listed building or not renewed.

Grade I and Grade II* listed buildings represent just 2.5% and 5.8% respectively of all listed buildings in England and Wales. Grade I listed buildings are those of exceptional interest and Grade II* are those of particular importance beyond special interest. They therefore represent a particularly sensitive, historically significant, scarce and irreplaceable resource. In applying the LLBCOs to Grade II listed buildings which represent 91.7% of all listed buildings categorised as having special interest, the Councils' are looking to maximise the beneficial impacts arising from the LLBCOs for the majority of listed building owners, whilst ensuring that the consequences are properly monitored and evaluated without the risk of the measures having unforeseen consequences on the small group of Grade 1 and Grade II* listed buildings across both districts.

Until the three-year trial is complete and the results evaluated, it is not possible to say what a future review of the LLBCOs will conclude.

⁷ in terms of (i) general public reaction (ii) the reaction of those using the LLBCOs and the associated processes in terms of ease of use (iii) the physical outcomes on grade II listed buildings and the duty to ensure that the architectural and historic special interest of listed buildings is conserved.



- *Concern expressed that any improved insulation associated the changes may result in open fires not being able to ‘draw’⁸ properly - thereby increasing the risk of carbon monoxide⁹ build up in rooms*

The need for appropriate airflow is recognised as is the fact that listed buildings are more likely than most to have working open fires (even if not the primary source of heating). The LLBCO will now refer to the need for work undertaken under the LLBCO to have regard to Historic England’s guidance ‘*Adapting Historic Buildings for Energy and Carbon Efficiency*’¹⁰ particularly where it refers to draught-proofing.

- *Concern expressed that if existing single glazed sash windows are to be double glazed they will become heavier due to the added weight of the glass, and that this may mean the existing pully weights are inadequate and so require heavier weights to be installed and this in turn may require wider alterations to the existing sash boxes.*

The text of the LLBCOs has been amended to exclude work/s to windows that requires a consequential alteration to the sash box/es.

Historic England

The Consultation Draft LLBCO (May-July 2025) is a modified and expanded version of a previous draft and takes account of written consultation comments sought and received from Historic England. (January 2025). The illustrations now added were also a direct response to comments made by Historic England about the value of illustrations in assisting understanding of the text.

Historic England has confirmed the following in writing (email 9 July 2025) in respect of the Consultation Draft LLBCO:

“the revised draft text of the Order is in line with our earlier comments. As regards the illustrations, these are helpful but I would like to suggest one minor amendment: The plan of ‘unacceptable replacement glazing’ is useful, but it would be improved if it featured an applied glazing bar as these are specifically not supported in Class B c) and Class C c). To have one pictured and labelled in the ‘unacceptable’ drawing would reinforce that text”

Amendments included in the LLCBO, following consultation

Other changes have been added to the LLBCO include:

- the title of the LLBCO has been amended to include reference to the District’s name and therefore the Order has been duplicated such that each| Order refers only to one District (Babergh or Mid Suffolk) on the basis that Babergh and Mid Suffolk Districts Councils are sovereign council’s.

⁸ An open fire draws air due to the principle that hot air rises, creating a pressure difference between the inside of the chimney and the outside. This pressure difference, or draught, pulls fresh air into the fireplace, fuelling the fire, and simultaneously pushes the smoke and combustion products up and out of the chimney.

⁹ Carbon monoxide (CO) is a colourless, odourless, and tasteless gas produced by the incomplete burning of carbon-containing fuels. It is highly toxic and can be fatal if inhaled in sufficient quantities

¹⁰ Historic England Advice Note 18 (HEAN 18), published 23 July 2024

- The definition of Council within the Orders has been expanded to include successor bodies created following Local Government Reorganisation. ["LGR"]
- the Orders are now described as 'No.1' to avoid confusion with any subsequent Orders in respect of other matters should these be introduced
- additional illustration to show typical side hung casement example as this is a common window type in historic buildings in Babergh and Mid Suffolk, particularly those in the countryside.
- additional images showing a typical applied glazing bar and glazing bar set within the double-glazed unit, both of which are not compliant with the requirements of the LLBCOs.
- the text now makes it clear that metal windows are excluded from the LLBCO, as the typical detail cannot be applied to metal windows in the same way as is possible for timber windows. Metal windows are likely to have slender frames and narrow glazing bars that cannot be modified to accommodate double glazing or slimline glazing without substantial alteration to the overall character. Exclusion of metal windows from the LLBCOs avoids any confusion as to the scope of the LLBCOs.
- exclusions from the LLBCOs have been amended to exclude unglazed doors, as this was never the intention of the LLBCOs
- titles of LLBCO amended to include reference to glazed or part-glazed doors as these are included in the LLBCO but not referred to in the title. Hence the clarification added above.
- maximum glazing thickness under the LLBCO has been clarified at 20mm for Class B works and 14mm for Class C works
- reference has been added to Historic England Advice HEAN 18 - *'Adapting Historic Buildings for Energy and Carbon Efficiency'*
- the text of LLBCO has been amended to exclude works to windows that requires a consequential alteration to the sash box/es.
- the LLBCO now makes it clear that works using uPVC, for joinery detail are not consented works.

A full summary of consultation responses is provided at Appendix 1.

Assessment of Impact

Section 26F of the *Planning (Listed Buildings and Conservation Areas) Act 1990* ('listed buildings Act') provides that, in considering whether to make a LLBCO, the local planning authority must have special regard to the desirability of preserving listed buildings of a description to which the order applies, their setting or any features of special architectural or historic interest which they possess.

In drafting the LLBCO the Councils have considered the significance of the prevailing building typologies, of which there are many, within the area. Whilst recognising that many ancient



dwellings across the districts did not have glazed windows to begin with and they may now have windows that are later interventions that are now in themselves of historic interest, windows in post-ancient historic properties are normally an integral and important part of the original design and construction of historic buildings. They form a distinctive element of domestic architecture and thus significance. Even here, existing windows may not be original, but may nevertheless have important heritage interest. Windows can also reveal manufacturing developments over time and technological advances such as the increasingly industrialised production of glass and materials such as metal being employed. They can comprise important historic fabric in their own right, providing evidence of historic skills and the use of materials of greater quality than that available today. For those reasons, the architectural and historic interest of surviving historic windows is almost inevitably positive and therefore they should be retained and repaired wherever possible. This is considered to be the case across the building typologies and uses encountered within the districts.

The proposed LLBCO would allow the installation of secondary glazing to historic windows, and the installation of double glazing or energy efficient glass to windows which have previously been consented and introduced after listing, or which are already installed within a consented modern/post-listing extension. Such works are conditionally consented across three Classes – A, B, and C. The Councils have considered the nature of the works to be carried out under those Classes and the likely effects. In drafting the LLBCO, the Councils have sought to identify circumstances where they might support the positive efficiency benefits that are capable of being secured whilst also ensuring that the special interest of listed buildings is conserved.

In relation to Class A, secondary glazing is an independent window system which can be installed to the interior of existing windows, normally within a window reveal and using simple, reversible fixings, while the existing windows remain in position and do not require any alterations as a result. It can take a number of forms and is normally openable or removable for ventilation and cleaning. If carefully designed to relate to the design of the primary windows, the secondary glazing units will be hard to see from the outside. The LLBCO therefore consents the installation of secondary glazing subject to conditions to ensure that it will be appropriately designed and fixed and that no alterations to the existing windows or their surrounding fabric are made as part of their installation. It is recognised that not all secondary framing elements need be timber, and there are various examples of other materials such as metal being employed within the District, so provision is made to ensure that any painted or coated finish shall match the windows and their surrounds. A condition is also added, following Historic England technical advice, preventing the installation of draught-proofing of the windows in addition to secondary glazing, to avoid the build-up of harmful moisture in the gap between the two; ventilation should be incorporated to reduce the risk of condensation and resulting decay.

Classes B and C will necessarily relate to windows or parts of a listed building introduced after listing i.e., not relating to historic fabric. It is therefore possible to consent works that might otherwise be objectionable if relating to surviving historic windows. Double glazing requires greater intervention, including the removal of historic windows and frames, and would not normally be acceptable if historic windows survive and can be repaired or refurbished. However, modern or replacement windows may have previously been legitimately installed in a listed building¹¹, perhaps due to the decay of historic windows or their replacement prior to the date of listing, and it is considered that it would not be harmful to the special interest of a listed building if these in turn are either replaced in their entirety with new double-glazed windows, or have sealed double glazed units of a slim design inserted in the existing frame and in accordance

¹¹ The LLBCOs would conditionally ensure that only previously consented windows are applicable.



with the previously consented or existing traditional detailing. Vacuum glazing units, slimmer still, are also capable of insertion in existing frames in such windows with no harm to the special interest of the building as whole. The advent of slim double-glazing units also means that there is now likely to be a very limited change in character over single glazing. The LLBCO does not facilitate the replacement of historic early glass such as 'Crown' or 'Float' glass with a modern alternative as it is the glass itself that is likely to contribute to the window's historic significance. Similarly the replacement of historically significant stained glass is not with modern clear glass is not facilitated by the LLBCO. Replacement of non-historic windows, including with double glazed windows or units is now regularly granted consent (and review of consents granted by the Councils confirms this).

Externally expressed but integral glazing bars are required by condition, as it is considered that applied glazing bars can have a non-traditional and inauthentic character which would be at odds with the architectural special interest of a listed building. Similarly faux glazing bars set within the glass / acrylic sandwich are not appropriate.

Clear glass has a greenish tint when viewed obliquely due to the presence of iron, as opposed to low-iron glass where this is unnoticeable. In most cases of domestic windows, the thickness of the glass means that this effect will not be unduly pronounced. Conditions are intended to prevent the use of darker, deliberately tinted glass, which may have an alien appearance in a traditional building.

Any integrated draught proofing contained within replacement windows is also covered by the LLBCOs. The installation of new draught-proofing must follow Historic England's draught-proofing advice¹², if it is to comply with this Order.

Therefore, in order to protect historic fabric, the LLBCOs are drafted in such a way that later, replacement windows in the listed building or new windows in an extension to it (in either case added after it was listed), may be replaced outright or reglazed. The LLBCOs apply only to such windows; any replacement of original or historical windows must remain the subject of full consideration under the process of a listed building consent application. Where new windows have been installed with the benefit of listed building consent their design will normally have been agreed because it respects the design of the listed building, and so if this design and appearance is replicated in the replacements then special interest will be preserved. Classes B and C of the Order are conditioned to ensure appropriate design and to prevent the inadvertent removal of original cills or any elements of window surrounds.

At this time, it has been determined that Grade II* and Grade I buildings should be excluded from the LLBCOs. This is in recognition of their more than special or exceptional levels of interest. As such, the usual listed building consenting process is considered to be the more appropriate means to ensure that their special interest is preserved. In circumstances where ecclesiastical buildings are not subject to their own consenting process the LLBCOs will not apply, and the usual listed building consenting process is considered to be the more appropriate means to ensure that their special interest is preserved.

To ensure that no historic fabric is lost, illustrative examples are annexed to the Order. This will give owners greater clarity about what works can be undertaken, including model examples,

¹²<https://historicengland.org.uk/images-books/publications/eehb-draught-proofing-windows-doors/hea084-draughtproofing/> Historic England highlight that it is important that some ventilation is still maintained when draught-proofing – to allow for 0.4 to 0.8 air changes per hour.



and would prevent inadvertent breaches of the LLBCOs and harm occurring to any listed building.

Overall, the Councils consider that the proposed consented window works, subject to the conditions specified, would have no adverse effect upon the significance of the listed buildings affected by the LLBCOs. At the same time and notwithstanding a clear private benefit to the owner of the building, there would be an important public benefit through contribution to the important environmental objective of moving to a low-carbon economy. The LLBCOs are therefore considered to be in compliance with the duty of S16 of the listed buildings Act.

Management and Monitoring

The Council will review the operation of the LLBCOs on an ongoing basis with a report prepared annually from the date of adoption. In order to ensure that the LLBCO is being properly implemented the Council will undertake random inspections of properties as part of audit and verification process to inform its consideration at the end of the three year life of the LLBCO.

Based on the notifications received (prescribed in the LLBCOs), the annual review will consider the number of instances of the works (by relevant Class) being carried out alongside an analysis of the number of occasions that work carried out under the LLBCOs were found not to be consistent with its requirements. (and therefore exempt from deemed consent). If at any time it is considered that the LLBCOs have been ineffective in facilitating the consented works, or are giving rise to unexpected and unacceptable outcomes, they may be varied or revoked. If at the end of the term of the LLBCOs it is considered that they have been operating effectively, delivering the balanced outcomes described in this Statement of Reasons, then, they will be renewed, and a longer term considered.

The Council is content that the LLBCOs are capable of being managed effectively if applied across the administrative area of the Districts of Babergh and Mid Suffolk and the Councils' are confident that it they have sufficient resource available across its joint Heritage and Enforcement services to monitor outcomes. The Orders are proposed to run for a limited period of 3 years and will be subject to further review at the end of that period.

Guidance

Prior to the introduction of the LLBCOs, The Council will publish separate guidance for those wanting to undertake works under the Order.

Process

Prior to the introduction of the LLBCOs, The Councils' and will prescribe the mechanism required for issuing the Pre-Start Notification Statement and Completion Notice Statement.

Prior to the introduction of the LLBCO, The Councils' will publish separate information on how it will operate its written Compliance Confirmation process.

Planning permission

Planning permission would not normally be required for the Consented Works. This is because the Class A works would affect only the interior of the building, and the Class B and C works are



conditioned to ensure that the works would not materially affect the external appearance of the building¹³.

The Orders themselves provide a detailed description of works falling in within the categories A, B and C and that is not included here in the Statement of Reasons, as that is not its purpose.

Financial Risks to the Council Associated with the LLBCO

Where an end date has been set and an Order expires, or where an Order is revised or revoked, there is a very small risk of compensation liability if abortive works have been carried out or any loss sustained which may be attributed to the expiry, revision or revocation. This liability can be avoided if the procedures in regulation 7 of the Planning (Local Listed Building Consent Orders) (Procedure) Regulations 2014 are followed.

[Regulation 7 describes the requisite Notice of Withdrawal and publicity process that is required and makes provision for a 6-month period of advanced notice of the LLBCO being withdrawn or amended.]

Justification and Conclusion

The proposed LLBCOs have been prepared to make it faster and easier for residents to improve the thermal efficiency of windows in their properties, and to signal the Councils' ongoing commitment to meeting their net zero ambitions at a time of climate emergency.

The proposed Consented Works have been designed to draw a careful balance and ensure that the architectural and historic special interest of listed buildings is conserved.

For the above reasons, the creation of the LLBCOs as amended is considered to be reasonable and justified as they will support homeowners to make important efficiency improvements to their buildings, without the burden or possible deterrent of additional costs and delays whilst ensuring that the architectural and historic special interest of listed buildings is conserved.

Such works can be undertaken in a sustainable manner.

END

¹³ Town and Country Planning Act 1990, S55 Meaning of Development (2) "The following operations or uses of land shall not be taken for the purposes of this Act to involve development of the land, (a) the carrying out for the maintenance, improvement or other alteration of any building of works which—
(ii) do not materially affect the external appearance of the building.



PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS ACT) 1990
PLANNING (LOCAL LISTED BUILDING CONSENT ORDERS) (PROCEDURE)
REGULATIONS 2014

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

1st October 2025

**‘SPECIFIED WORKS’ TO WINDOWS AND GLAZED or PART-GLAZED
DOORS in ‘DEFINED’ CIRCUMSTANCES**

related documents

a. The ORDER

b. STATEMENT of REASONS

c. GUIDANCE



produced by
the Heritage Team:
Place Directorate
Babergh Mid Suffolk District Councils