
Addendum note on historic environment assessment: Land West of Wakefield Road, Athersley Barnsley, Planning Reference 2017/1451

This note is provided in response to a request for comments from the Planning Consultant, Cushman and Wakefield. It provides a response to consultation comments received on historic environment matters in relation to the above proposed development.

TEP provided a historic environment desk-based assessment and impact assessment (TEP, 2017) in support of an application for a development of up to 220 dwellings with associated open space, road and drainage infrastructure (outline with all matters reserved apart from means of access). Consultation responses that relate to this assessment have been received from:

- Historic England (letter from Neil Redfern dated 11 December 2017);
- Tony Wiles, Design & Conservation Officer at Barnsley Metropolitan Borough Council (email dated 13 December 2017), and
- Edward Jowett, Tree Officer at Barnsley Metropolitan Borough Council (email dated 7 December 2017).

In these responses, Historic England objects to the proposals pending further commitments regarding the Scheduled Monument, East Gawber Colliery Fanhouse.

The Conservation Officer does not object to the proposals, but reiterates that the relevant local plan policy should be given appropriate weight (policies relate to safeguarding the Scheduled Monument, assessing the archaeological potential of the site and retention of hedgerows).

The Tree Officer objects to the application because of the loss of a hedgerow.

The Local Plan Policy

The proposed development is within site allocation 'H42'. A report undertaken by Wessex Archaeology for Barnsley Metropolitan Borough Council (Wessex Archaeology, 2015, Barnsley Local Plan, Archaeology Scoping Study of Potential Site Allocations, Reference 108680) considers the potential effects of allocation for housing development on this site. This report concludes, in relation to site H42 that "*Site H42 and the Scheduled Monument do not share any intervisibility due to the railway embankment... The allocation of Site H42 is therefore not deemed to have a direct visual impact on the Scheduled Monument and there will be a negligible impact on the immediate setting of the monument. The assessment has identified, however, that any future development in Site H42 could have an indirect impact on the Scheduled Monument.*" The report also recognises that "*a development nearby would reduce the remote nature of this monument and could therefore lead to a reduction in anti-social activity*". The report concludes "*given the potential indirect impact on the Scheduled Monument due to the relationship between it, the railway embankment and Site H42, there is a potential that the setting of the monument will be impacted upon by development. The impact is judged to be low to moderate, resulting in minor to moderate adverse effect. Any detrimental effect has the potential to be offset by ensuring any development within Site H42 includes proposals to ensure a sustainable future for the Scheduled Monument which will result in an improvement of the condition of the site*".

Subsequently, the following policy was proposed in the document "Local Plan Publication Version Heritage Impact Assessment 2016"

“Development of site H42 will be accompanied by plans for the improvement, protection and maintenance of the adjacent Scheduled Ancient Monument known as East Gawber Hall Colliery Fanhouse and its setting. Development of the site will not take place until details are submitted to the authority and approved in writing by for maintenance of the monument.”

Section 14 of the Local Plan Publication Draft 2016 includes a number of Historic Environment Policies, provisions in Policy HE1 are consistent with this proposal.

The East Gawber Colliery Fanhouse

The Fanhouse is a scheduled monument that is also on the Heritage at Risk register. The assessment concludes that the development would have a moderate adverse effect on this asset, which would be equivalent to less than substantial harm. This assessment is consistent with the Wessex Archaeology conclusion. Historic England do not state whether they consider the harm to be substantial or less than substantial, but refer to paragraphs 132 and 134 of the NPPF, indicating that they consider any harm would be less than substantial.

The NPPF directs that 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 securing its optimum viable use.

In this case, measures are proposed that would advance understanding of the scheduled monument and associated non-designated heritage assets, and this would be made publicly accessible. The NPPF identifies that Local Planning Authorities should *“require developers to record and advance understanding of the significance of any heritage asset to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible”*. The proposed mitigation is in accordance with this policy, and with policy in the draft local plan. It is proportionate to the importance and impact.

The scheduled monument is not within the ownership of the Applicant, and providing repairs to the fabric of the upstanding remains, while potentially desirable, is not a proportionate response to the predicted level of impact. There are potential benefits from development, in that it could reduce anti-social behaviour and encourage more positive management of the asset, as noted in the Wessex Archaeology assessment.

Discussion with Historic England can continue with an aim to reach agreement on the treatment of the scheduled monument, but in any event these matters could be dealt with as a condition of consent.

Archaeological Potential

The staged programme of archaeological work outlined in the Historic Environment Assessment (TEP, 2017) is consistent with the Policy HE6 of Section 14 of the Local Plan Publication Draft 2016, and with paragraphs 135 and 141 of the NPPF. This matter can be dealt with as a condition of consent.

The Hedgerow

Paragraphs 4.26 – 4.29 of the Historic Environment Assessment (TEP, 2017) assess the hedgerows on the site against Schedule 1, part II, criteria 1 of the Hedgerow Regulations 1997 (the archaeology and history criteria). This concludes that hedgerow within the site is, although slightly altered, ‘important’ under those criteria. However, the historic landscape character of the area is a post-colliery landscape, and the hedgerow does not contribute to this historic interest. An ‘important’ hedgerow is not a designated heritage asset in NPPF

terminology and in this case the hedgerow has only a limited (local) heritage significance. The loss of the hedgerow has been treated as an effect on a non-designated asset and considered against paragraph 135 of the NPPF. A programme of recording is proposed, to include the hedgerow. Again, this could be dealt with a condition of any forthcoming consent.

Conclusion

The assessment undertaken in support of the application is consistent with previous work undertaken on behalf of the LPA, and referenced by Historic England, in terms of the assessed effect of development on the scheduled monument. The assessed effect is considered to be less than substantial, and should therefore be weighed against the public benefits of the proposed development. Further, a comprehensive programme of archaeological recording has been proposed by the Applicant that would advance understanding of the asset, and its relationship with non-designated heritage assets within the development site. The SM itself is not within the development site, or the Applicant's ownership. The measures proposed are reasonable and could be secured as a condition of consent.

The hedgerow within the site has been accepted as meeting the criteria for 'important' hedgerow set out in the hedgerow regulations, however, its removal is integral to the proposed development plans and therefore an assessment of the effects of its removal on the historic environment has been undertaken. The hedgerow is of local interest and a record could be made of the hedgerow prior to removal, again secured as a condition of planning consent. The residual effect on the historic environment would be negligible.