

Worsbrough Watermill

Heritage, Design and Access Statement

For Barnsley Metropolitan Borough Council



First Floor Access Ramp

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1.0 Summary of Heritage, Design and Access Statement

1.1 Introduction

Donald Insall Associates was commissioned by Barnsley Metropolitan Borough Council in March 2024 to develop proposals for a revised internal access ramp at Worsbrough Watermill. This statement has been prepared in support of an application for listed building consent for these proposals.

The design process has been informed by an assessment of the site's significance, comprising historical research, using both archival and secondary material, and a site inspection. An illustrated history of the site and building, with sources of reference and bibliography, is in Section 2; the site survey findings are in Section 3. The investigation has established the significance of the building, which is set out in Section 4 and summarised below. This understanding has informed the development of proposals for change to the building which are outlined in Section 5. Matters relating to access and structures are included in Section 6 and Section 7 provides a justification of the scheme according to the relevant planning policy and guidance.



Worsbrough Watermill

1.2 The Building[s], its [their] Legal Status and Policy Context

Worsbrough Mill is Grade II* listed building located in the Barnsley Metropolitan Borough. It is in the setting of a listed mill cottage and nearby listed bridge. Alterations to a listed building generally require listed building consent; development in conservation areas or within the setting of a listed building or conservation area requires local authorities to assess the implications of proposals on built heritage.

The statutory list description of the listed building is included in Appendix I and a summary of guidance on the along with

extracts from the relevant legislation and planning policy documents.

The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Section 16 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to have *'special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses'* and, in respect of conservation areas, that *'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'*.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the Site comprises the Barnsley Local Plan (adopted 2019).

The Barnsley Local Plan has policies that deal with development affecting the historic environment, and these require that developers embrace good design which protects and enhances the significance of the historic environment and its heritage assets, encouraging developers to work in partnership with organisations such as the Barnsley Civic Trust and other relevant organisations in forwarding proposals. Any proposals affecting known heritage assets are expected to include a description of heritage significance and the site and setting, fulfilled by this report in sections 3 and 4. Developments seeking to affect or alter listed buildings should seek to conserve and where appropriate enhance the buildings significance.

The courts have held that following the approach set out in the policies on the historic environment in the National Planning Policy Framework 2023 will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). At the heart of the Framework is *'a presumption in favour of sustainable development'* and there are also specific policies relating to the historic environment. The Framework states that heritage 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'*. The Glossary to the National Planning Policy Framework defines a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 200, states that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Section 4 of this report – the assessment of significance – meets this requirement and is based on the research and site surveys presented in sections 2 and 3, which are of a sufficient level of detail to understand the potential impact of the proposals.

The Framework also, in paragraph 205, requires 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 206 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.

Section 7 of this report will provide this clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either 'substantial' or 'less than substantial'. Where a proposed development will lead to 'substantial harm to (or total loss of significance of) a designated heritage asset', the Framework states, in paragraph 207, that:

...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

1.3 Summary of Project Brief

The proposals seek a new first floor access ramp at first floor level to replace an existing non-compliant element. The aims of this project are to improve access to the working elements of the mill when access is not open to the public by making this structure demountable and infilling a small section of flooring. The existing ramp forms part of the late 20thC alterations which opened the mill to the public as a museum.

A more detailed description is included in Section 5.1.

1.4 Summary Assessment of Significance

The significance of Worsbrough Watermill relates to interwoven architectural, historical and cultural elements. As a building which was originally constructed in the 17th century, subsequently expanded with new milling machinery in the 19th and 20th century, it illustrates the progression of the milling process over the last 400 years. This importance is supplemented by the fact that flour is still milled there today, helping to ensure the intangible continuity of milling craft, whilst acting as a public museum to disseminate this history to a wider audience. With this in mind, any proposals should protect these factors as upmost importance, seeking to enhance public accessibility whilst ensuring milling can still take place unimpacted.

1.5 Summary of Proposals and Justification with Respect to Design, Access and Heritage

The proposals affect portions of the fabric which are majority of the 20th Century. The ramp to be replaced was introduced as part of the 20th C conversion to the museum so holds a low level of significance and its replacement with a compliant structure is an enhancement for public access to the site. Allowing this new structure to be demountable will improve access to the working portions of the mill and help to continue the tradition of using the structure to mill flour.

Historic fabric will be affected minorly where the new floor is to be introduced, however this will be subsidiary to the historic 17th C timber structure. With this in mind it will be a reversible intervention distinct from any historic floor boards and fabric.

Being internal, there is no impact to the wider significance of the buildings setting. Improved access to the building will improve its offer as a site of historic interest and enhance the interpretative value of the site as a museum.

1.6 Conclusion

Based upon the minimal impact upon historic fabric and the significance of the structure, as well as the enhancement of access within the building, this report recommends the proposals be accepted.

2.0 Historical Background

2.1 Historical Development

The first recorded mention of a mill at Worsbrough appears in the Domesday Book of 1086. Although the exact location of this early mill along the River Dove is unknown, it establishes the long-standing presence of milling activities in the area. The existing mill complex dates to around 1625. This period saw the construction of the two-storey stone building known as the Old Mill, which houses the waterwheel. The structure from this era is characterized by its deeply coursed dressed sandstone and stone slate roof.



Plate 2: Worsbrough watermill with the 17th century segment on the left and the 19th century extension on the right.

In 1843, the mill underwent significant expansion with the addition of a steam-powered flour mill. This new section, built with Welsh slate roofs, includes a three-storey building. The introduction of steam power marked a major technological advancement, allowing for increased production efficiency. A now rare Hornsby oil engine was installed in 1911, further modernizing the mill's operations. This engine, although not linked to the millstones, represents the continued evolution of milling technology at Worsbrough.

By the mid-20th century, the mill had fallen out of use as newer technologies emerged. Recognizing its historical importance, the old West Riding County Council initiated restoration work in the 1970s. This project focused on both structural repairs and the reactivation of the mill's machinery, including the restoration of the water wheel. The restoration was completed in 1976, and the mill reopened as a museum under the management of South Yorkshire County Council. This transformation allowed the public to experience a working water mill and learn about traditional milling processes. The museum featured demonstrations of the restored water wheel and other historical machinery.

Throughout the early 21st century, Worsbrough Watermill continued to operate as a museum and visitor attraction. It produced stoneground flour and provided a living history experience. During the COVID-19 pandemic, the mill saw a resurgence in demand for its flour as people turned to home baking. Despite public visits being restricted, the mill adapted to the increased demand. Today, Worsbrough Watermill remains a popular destination within Worsbrough Country Park, offering both historical insights and recreational opportunities.

3.0 Site Survey Descriptions

3.1.1 The Wider Setting

Worsbrough Watermill is nestled within the scenic Worsbrough Country Park, which features a reservoir historically used to service the Dearne and Dove Canal. The park provides a picturesque setting for the mill. The site is easily accessible via the Trans Pennine Trail, a popular route for walkers and cyclists. The surrounding landscape includes well-maintained paths, wooded areas, and open spaces, creating a serene and inviting atmosphere for visitors. The mill's location within this park enhances its appeal as a destination for both historical interest and outdoor recreation.

Space has been set out for car parking with several smaller light-weight cabins being used for storage

3.2 The Building Externally

The Worsbrough Watermill complex consists of two main sections: an early 17th-century part and a mid-19th-century addition. The 17th-century section is constructed from deeply coursed dressed sandstone with a stone slate roof. This part of the building features a wide doorway with an external stone ramp and a massive lintel. Adjacent to the doorway is a four-light double-chamfered mullioned window with iron stanchions. A broad buttress with six chamfered offsets adds structural support. The first floor retains original three-light mullioned windows with iron stanchions and casements, as well as a later two-light mullioned window above the buttress. The left return of this section includes a quoined first-floor doorway with a massive lintel.

The 19th-century addition, characterized by its Welsh slate roofs, is three storeys high with a loft and four bays. This section includes a round-headed iron casement with glazing bars, adding a distinctive architectural element. The bay three doorway, accessible via an external stone ramp, is complemented by a first-floor doorway with an ashlar surround. Other bays feature thirty-six-pane iron casements with projecting stone sills and plain lintels, providing ample natural light and a cohesive aesthetic. The second-floor window in bay two is blind. Ashlared gable copings and small end stacks complete the end elevations, while the rear of this section includes three bays of similar iron casements.

3.3 The Building Internally

The 17th century portion of the building is set out over two storeys and remains a functional space for the milling of flour. Inside this portion, an early 19th-century cast-iron overshot water wheel drives three pairs of millstones. This section retains its original king-post trusses with trenched purlins. The interior space is characterized by its robust wooden beams and stone walls, creating an authentic and immersive environment. Internally the walls are limewashed.

The 19th-century part of the mill, originally designed to be steam-powered, now houses a rare Hornsby oil engine from 1911. The interior of this section features spacious rooms with high ceilings, allowing for the accommodation of large machinery and providing a sense of the industrial scale of operations during its peak.



Plate 3: First floor of the 17th century portion showing the existing 20th century access ramp.



Plate 4: Step at the foot of the 20th century ramp.



Plate 5: Step at the top of the 20th century ramp.



Plate 6: Ground floor ceiling showing location of floor to be infilled.



Plate 7: Ground floor area beneath the new ramp and mill machinery.

3.4 The Access Ramp and Milling Floor

The timber access ramp was constructed as part of the mill's 20th century conversion to a museum. It spans the platforms at both end of the building over the mill stones. It has timber balustrades and is set to a non-compliant gradient over 1 in 12.

4.0 Assessment of Significance

4.1 Worsbrough Watermill Significance Summary

Worsbrough Mill is a functioning watermill dating to the 17th century, now open to the public as a museum. There has been a mill on this site since at least the Domesday book of 1086. Much of this 17th century fabric remains intact including Kings-post roof trusses. An adjoining 19th century block illustrates industrial development, being of a larger scale and originally housing a steam engine, but now containing a 1909 oil engine. The earlier segment is of roughly coursed dressed sandstone with stone slate roofing, whilst the adjoining block is of a similar material with Welsh slate roofing. It is a public site set within a wider country park, still known for milling flour today.

Where as the site and context of the mill are considered, this assessment is proportionate to the localised site of the interventions within the first floor of the 17th century portion of the mill.

4.1 Significance Methodology.

To adequately assess the significance of the site it is necessary to set out categories for assessing the qualities which contribute to its value as a heritage asset. These are broadly broken down into three categories of special interest below. These categories are referred to in the development of design proposals to ensure that any interventions understand the significance of the mill as well as work to enhance or protect it.

Special Interest	Definition
Architectural and Artistic Interest	Derives from a contemporary appreciation of an asset's aesthetics. Architectural interest is an interest in design, construction, craftsmanship and decoration of buildings and structures. Artistic interest can include the use, representation or influence of historic places or buildings in artwork. It can also include the skill and emotional impact of works of art that are part of heritage assets or assets in their own right.
Historic Interest	The way in which an asset can illustrate the story of past events, people and aspects of live (illustrative value or interest). It can be said to hold a communal value when associated with the identity of a community.
Archaeological Interest	The potential of an asset to yield evidence of past human activity that could be revealed through future investigation. Archaeological interest includes above-ground structures, as well as earthworks and buried or submerged remains.

This special interest is manifest in the fabric of the building under the following hierarchy of significance.

Relative Significance	Definition
Outstanding	Elements of the place that are of key national or international significance, being among the best or only surviving examples of an important type of monument or being outstanding representatives of important social or cultural phenomena.
High	Elements that constitute good and representative examples of an important class of monument (or the only example locally), or that have a particular significance through association (although surviving examples may be relatively common on a national scale) or that make major contributions to the overall significance of the monument
Medium	Elements that contribute to the character and understanding of the place, or that provide a historical or cultural context for features of individually greater significance.
Low / Neutral	Elements that are of minor value in general terms or have little or no significance in promoting understanding or appreciation of the place, without being intrusive.
Detrimental	Items that detract visually from or that obscure understanding of more significance elements. Recommendations may be made on their removal or on other methods of mitigation.

Of **High Significance** is the site's historic interest as a place where milling has taken place for 1000 years. This purpose was only broken for a short period in the 1960's prior to its restoration and reopening as a museum in 1972. Also of high significance is the architectural survival in the old 17th century mill building which still retains much of its original roof structure.

Its form with 19th century additions illustrate 5 centuries of milling development, with water, steam and oil engines all being used to grind flour at one point or another.

The continued craft of milling to occur on site as well as this development throughout history should be considered paramount in any proposals or interventions.

Of **medium** and therefore broadly adaptable is some of the milling furniture which has been replaced during the 20th century. This should be considered in the context of continued use and considered modifications should be weighed to ensure the continued milling of flour on site. This includes the replacement of mill stones, mill chains and other broadly replaceable machinery which allow the milling of flour to take place.

Of **Low / neutral significance**, neither contributing to or detracting from the significance of the whole and therefore highly adaptable are the interpretive interventions made in the conversion of the site to a museum. This conversion was undertaken in the 1970's so should be considered in the light of contemporary developments in understanding the structure. These 20th century interventions, including the ramp should be considered in how they best allow public access to the site and allow for modifications to ensure best practice in terms of access to ensure all members of the public can continue to enjoy the site. Such elements should also be carefully considered in their relationship to the milling of flour in the structure, ensuring that any interpretive interventions do not come at detriment to the continued use of the structure.

There are no **Factors which detract** from the building's significance considered in this scheme.

5.0 Brief and Design Proposals

5.1 Understanding the Brief

The brief must be understood in the context of the building as a heritage asset, working flour mill and public museum. The current ramp is in close proximity to the working milling equipment and provides little headroom beneath one of the tie beams. The brief desires to improve this arrangement by introducing a replacement ramp to a compliant gradient, increasing headroom and allowing for more space around the millstones.

To improve the space around the millstones, the new ramp is to be demountable, with the ability to be removed when the mill is closed to the public and access between the two floors is not required. This will allow improved working conditions when milling flour, without compromising the need for access in the museum.

5.2 Description of the Proposals

The new ramp will be of light-weight timber construction and be of a greater length than the existing to allow for a shallower compliant gradient. It will be flush with the existing floor levels, omitting the minor step present in the current ramp. It will be removable in several segments which can be moved aside during times when milling is being undertaken. The balustrades will also be of timber construction and removable as separate pieces in the design with the ability to slot into the access points to the ramp to protect users from falling. All timber will be stained to match existing timber finishes within the space.

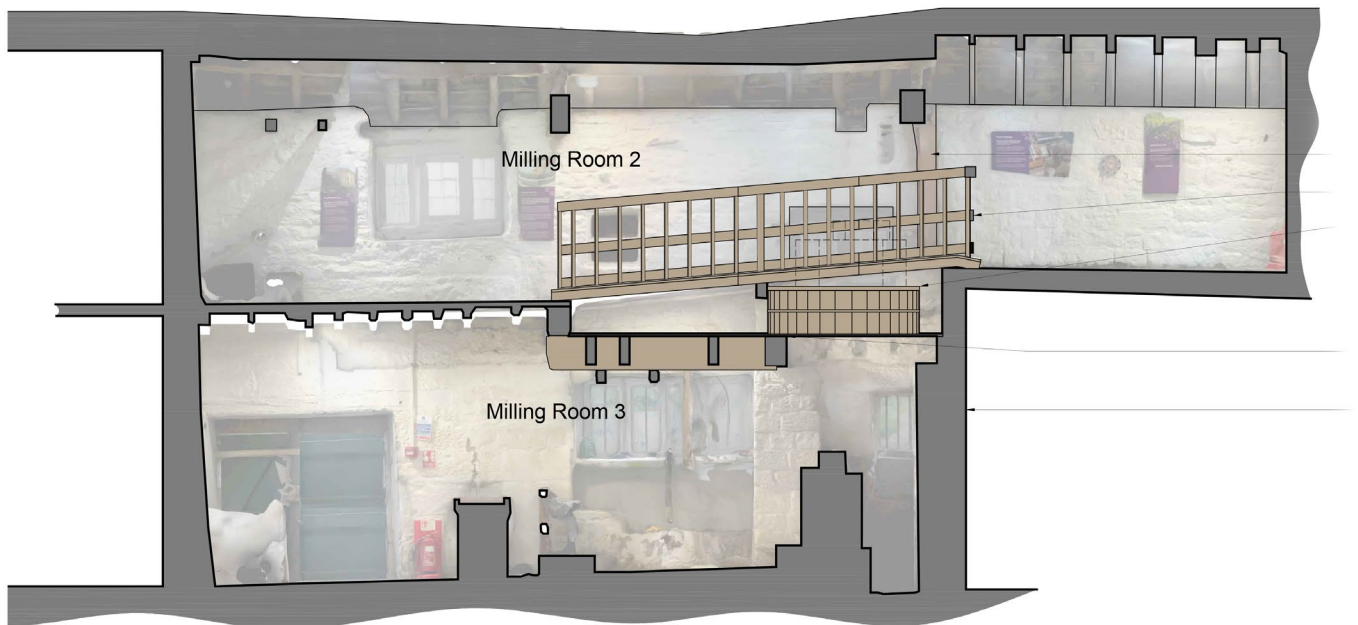


Figure 1: Section showing the existing ramp.



Figure 2: Section showing the proposed ramp.

Beneath the location of the existing ramp, a small section of infilled floor area will be installed. This will be oak joists and floor boards, supported on the existing structural timbers. Some minor reinforcement to the timber beams will be required, however no additional structural members will be installed.

Some minor modifications will be made to the mill chain housing to ensure 800mm of clear width along the ramp.

6.0 Further Design Considerations

6.1 Access

The new ramp will mark an improvement in access arrangements as it will be set to a compliant gradient. There are some areas of reduced headroom beneath the historic tie-beams, however, modifications of this element would pose significant harm to the historic fabric. Sufficient warnings and markers will be included to mark out this headroom. One portion of the ramp will narrow to 800mm, which is deemed acceptable as it is similar to traversing a door threshold. The majority of the ramp is of a width of 1050mm.

6.2 Highways

No amendments to public or private highways are required.

6.3 Parking

No amendments to parking arrangements are required.

6.4 Structure

A structural assessment of the site has been carried out by Mason Clarke Associates and is included as part of the application. The assessment identified no major structural issues with the 17th c timbers with only minor corrosion of the iron fixings. This report should be referred to for structural recommendations.

7.0 Commentary on the Proposals

7.1 Impact on the Listed Building

The proposals prove a minimal impact upon the listed building. The only fabric to be removed is that of the existing 20th century ramp, which is not original to the structure and serves the purpose of accessibility in its function as a museum. By replacing this with a ramp which is more in line with the building regulations, these proposals are deemed an enhancement. The materials proposed are timber, to ensure that the new structure is in-keeping with the existing fixtures in the structure.

Infilling the floor will have a minor impact on the building, with some connections to historic fabric required. This is seen to be offset by allowing additional space for the millwright to use the machinery at first floor level. The new ramp, which is to be demountable, will also help to improve the working space for the millwright.

7.2 Local Policy Justification of the Proposals

The Barnsley local plan has policies which deal with development affecting the historic environment, principally dealt with in policy 14 of the *Barnsley Local Plan*. Within this policy Worsbrough Watermill is explicitly mentioned as the 'only historic working water mill in South Yorkshire', implying that any development at the site would need to take direct account of the local plan.

This document fulfils the requirements of HE2, which required Heritage Statements to be undertaken in a proportionate manner to the proposals being made. Policy HE3 requires a respect for historic precedents, seeking to conserve and, where appropriate enhance, a building's significance. Policy HE3 is considered in line with these proposals as the ramp will enhance visitor experience to the site with no loss of significant fabric, and only minor alterations to the listed building required.

Policies HE4, HE5 and HE6 which relate to historic landscapes, demolition of heritage assets and archaeology, respectively, are not deemed to apply to this application as it does not affect the setting, landscape, involve demolition, or disturb any archaeology in its course.

By improving accessibility to the museum, the policy responds well to policy E5, in which the promotion of existing cultural provision and tourism offer is mentioned. Worsbrough Watermill is again mentioned explicitly under section 8 *economy* of the local plan as an existing tourist attraction.

7.3 Conclusion

Through considered design which has assessed the historic fabric and local policies which relate to it, the proposals are deemed to be of minimal impact to Worsbrough Watermill and enhance its accessibility as a museum.

Appendix I - Statutory List Description

Official list entry

Heritage Category:

Listed Building

Grade:

II*

List Entry Number:

1151044

Date first listed:

11-Nov-1966

Date of most recent amendment:

04-Dec-1986

List Entry Name:

Worsbrough Corn Mill

Statutory Address 1:

Worsbrough Corn Mill, Park Road

The scope of legal protection for listed buildings

Location

Statutory Address:

Worsbrough Corn Mill, Park Road

The building or site itself may lie within the boundary of more than one authority.

District:

Barnsley (Metropolitan Authority)

Parish:

Non Civil Parish

National Grid Reference:

SE 34945 03326

Details

SE30SW 1/90

WORSBROUGH PARK ROAD (west side, off) Worsbrough Corn Mill

(formerly listed as Worsbrough Bridge Mill)

11.11.66

GV II* Corn mill now museum. Early C17 with addition of c1843. Deeply-coursed dressed sandstone, stone slate and Welsh slate roofs. C17 part on left is two storeys and three bays (internally); C19 part on right three storeys with loft, four bays. C17 part: wide doorway to right has external stone ramp and massive lintel, four-light double-chamfered, mullioned window on its left has iron stanchions, beyond is a broad buttress with six chamfered offsets and with small window, another door to far left. Original three-light mullioned window to first-floor right has iron stanchions and casement with glazing bars, later two-light mullioned window above buttress. Left return of C17 part: quoined first-floor doorway with massive lintel.

C19 part: bay four breaks forward and has round-headed iron casement with glazing bars, bay three doorway with external stone ramp, first-floor doorway above has ashlar surround. Other bays with thirty-six-pane iron casements with projecting stone sills and plain lintels, bay two window on second floor is blind. Ashlar gable copings with small end stacks. Rear of C19 part has three bays of similar iron casements.

Interior: C17 part has early-C19 cast-iron overshot wheel driving three pairs of stones. Original king-post trusses with trenched purlins. C19 part, originally steam-powered, now contains a rare Hornsby oil engine of 1911.

History and technical details of mill discussed at length in (R.Shortland-Ball, 'Worsbrough Corn Mill, South Yorkshire', Industrial Archaeology Review, 2, No 3, 1978.

Appendix II - Planning Law, Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

[...] in considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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.

Similarly, section 66 of the above Act states that:

In considering whether to grant permission for development which affects a listed building or its setting, the local planning authority, or as the case may be the Secretary of State shall 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.

Similarly, section 72(1) of the above Act states that:

[...] with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (December 2023). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 203 of the NPPF identifies the following criteria in relation to this:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness*

With regard to applications seeking to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), paragraph 204 states that:

...local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 205 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 206 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. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 207 of the NPPF states that:

...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*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following:

208. 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.

In terms of non-designated heritage assets, the NPPF states:

209. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage

assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 212 states that:

... Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 213, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Concerning enabling development, it states, in paragraph 214, that local authorities should:

assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) was published on 23 July 2019 to support the National Planning Policy Framework (NPPF) 2023 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 211)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- **archaeological interest:** As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- **historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 205-208 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 205-208) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms 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). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 206).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Other Relevant Policy Documents

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

Historic England: Conservation Principles and Assessment (2008)