

RIBBLE VALLEY BOROUGH COUNCIL REPORT TO PLANNING & DEVELOPMENT COMMITTEE

Agenda Item No.

meeting date: 21 AUGUST 2014
title: CONSULTATION ON ENGLISH HERITAGE DRAFT HISTORIC
ENVIRONMENT GOOD PRACTICE ADVICE IN PLANNING
submitted by: DIRECTOR OF COMMUNITY SERVICES
principal author: ADRIAN DOWD – PRINCIPAL PLANNING OFFICER (DESIGN AND
CONSERVATION)

1 PURPOSE

- 1.1 To seek Member authorisation to respond to an English Heritage consultation on draft Historic Environment Good Practice Advice notes.
- 1.2 Relevance to the Council's ambitions and priorities
 - Council Ambitions – To protect and enhance the existing environmental quality of our area.
 - Community Objectives – The Ribble Valley Sustainable Community Strategy 2007-2013 has three relevant strategic objectives – maintain, protect and enhance all natural and built features that contribute to the quality of the environment. Ensure that the design of buildings respects local character and enhances local distinctiveness. Sustainably manage and protect industrial and historical sites.
 - Corporate Priorities – Objective 3.3 of the Corporate Plan commits us to maintaining and improving the environmental quality of the Ribble Valley. Objective 3.8 of the corporate plan commits us to conserving and enhancing the local distinctiveness and character of our towns, villages and countryside when considering development proposals.
 - Other Considerations – None.

2 BACKGROUND

- 2.1 PPS5 Planning for the Historic Environment (2010; including PPS5 Practice Guide) and Planning Policy Guidance 15 Planning and the Historic Environment (1994) were integrated and fully government endorsed policy and guidance documents.
- 2.2 As part of the Government's reform of the planning system, historic environment information has been restructured.
- 2.3 The National Planning Policy Framework was published on 27 March 2012.
- 2.4 In 2012 Lord Taylor of Goss Moor undertook an external review of government planning practice guidance. The Government response to the report was published on 21 May 2013.

Paragraph 12 states “we accept the majority of the report’s recommendations, with the exception of the immediate cancellation of out of date guidance”.

Paragraph 13 states “we believe that the current guidance should remain in place until the new guidance suite is ready. We consider this important to ensure that there is no gap or perceived gap in the provision of guidance, and so will not be accepting the recommendation to cancel any material ahead of the new guidance being available”.

- 2.5 On 6 March 2014 the Department for Communities and Local Government launched the National Planning Practice Guidance (NPPG) web based resource. The section entitled ‘Conserving and enhancing the historic environment’ contains government endorsed guidance on ‘Plan making: historic environment’ and ‘Decision taking: historic environment’. The latter includes guidance entitled ‘What is the setting of a heritage asset and how should it be taken into account?’.

3 CONSULTATION

- 3.1 On 16 July 2014 the Borough Council was invited by English Heritage to comment on Historic Environment Good Practice Advice in Planning. The three Historic Environment Good Practice Advice notes published for consultation (available on the English Heritage website) are:

The historic environment in local plans
Decision taking in the historic environment
The setting of heritage assets

The consultation states “these are intended to assist Local Planning Authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework and the related guidance given in the Planning Policy Guidance”.

The Borough Council is also informed that the “PPS5 Practice Guide remains in place for the time being but we are expecting that Government will cancel it once the post consultation versions of these advice notes are published. We hope this will be in early autumn 2014”.

- 3.2 Each document introduction states “this good practice advice therefore supports the implementation of national policy, but does not constitute a statement of government policy itself”.
- 3.3 The consultation is structured and the Borough Council is invited to comment on a number of specific issues. The deadline for the response is 5 September 2014. However, Question 10 invites general comment on the consultation document.

4 RISK ASSESSMENT

- 4.1 The approval of this report may have the following implications

- Resources – N/A
- Technical, Environmental and Legal – N/A

- Political – N/A
- Reputation – N/A
- Equality & Diversity – N/A

5 CONCLUSIONS

5.1 In response to Question 10 of the consultation, I would have the following comments.

5.2 ‘Decision taking in the historic environment’ paragraph 52 ‘Marketing to demonstrate redundancy’, is welcomed in providing some clarity as to what the ‘medium term’ (NPPF paragraph 133) is in demonstration of building redundancy. Under the title ‘The timing of the marketing’ is stated “under poor market conditions the applicant may be advised to ‘mothball’ the asset until conditions have improved to the point when a negative response can be reasonably ascribed to a genuine lack of interest in the asset itself rather than to general market conditions”.

5.3 The English Heritage website suggests that post cancellation of the PPS5 practice guide in early autumn 2014 “*Technical Advice in Planning notes are planned on ... (and thirdly) Managing Change to Heritage Assets (formerly Part 6 of the PPS5 practice guide)*”. In my opinion, Part 6 (appended) provides a very useful, easily understood and succinct guide to the repair, alteration and extension of heritage assets. In my opinion, Part 6 (and its predecessor Annex C ‘Guidance on Alterations to Listed Buildings’ of Planning Policy Guidance 15) provides essential reference and justification for the Borough Council’s day to day development management decisions ensuring efficiency, consistency and transparency in respect to planning applications, listed building consents and pre-application advice. The deletion of this Government endorsed guidance before the availability of similarly themed English Heritage Technical Advice is of concern and is likely to cause a difficult hiatus in the processing of historic environment related applications and the challenge of more Borough Council decisions.

Mindful of the Government’s reservations in respect to the Taylor report’s conclusions, I would therefore suggest to English Heritage that Part 6 of the PPS5 practice guide be retained until new and equivalent advice is in place and consideration be given to the incorporation (or anchoring) of this information within the Government endorsed NPPG.

5.4 ‘Decision taking in the historic environment’ has only two paragraphs on ‘Unauthorised works, enforcement notices and prosecution’. Mindful that unauthorised work affecting the special interest of a listed building (including non compliance with conditions attached to a listed building consent) is a criminal offence under section 9 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the recent and unfortunately necessary development of the English Heritage Heritage Crime Programme and the extensive guidance within ‘Best practice guidance on listed building prosecutions’ (2006) this is, in my opinion, insufficient direction, encouragement and support for this important and resource demanding aspect of the Borough Council’s work.

5.5 Consideration to the ‘Neglect’ of listed buildings is similarly brief. In my opinion, the prioritisation and early discussion with building owners of maintenance and repair issues is essential to preventing or reducing the scale of problems and costs. Again, I note the

divergence of English Heritage draft good practice advice from Government requirements stated at NPPF paragraph 126 “Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance”.

6 RECOMMENDED THAT COMMITTEE

- 6.1 Authorise the Director of Community Services to respond to the English Heritage consultation and with the opinions expressed in section 5 ‘Conclusions’ above.

ADRIAN DOWD
PRINCIPAL PLANNING OFFICER (DESIGN AND CONSERVATION)

JOHN HEAP
DIRECTOR OF COMMUNITY SERVICES

BACKGROUND PAPERS

1. English Heritage Consultation document – Good Practice Advice in Planning.
2. Extract from PPS5 Practice Part 6.

For further information please ask for Adrian Dowd, extension 4513.

REF: AD/EL/210814/P&D

ENGLISH HERITAGE

CONSULTATION ON HISTORIC ENVIRONMENT GOOD PRACTICE ADVICE IN PLANNING: Consultation Questions

Please submit your responses to the questions asked and/or comments by **September, 2014** to goodpracticeconsultation@english-heritage.org.uk. If you do not have access to email, please provide them in writing to: Good Practice Advice Consultation, Government Advice Team, English Heritage, 1 Waterhouse Square, 138-142, Holborn, London EC1N 2ST.

To assist you in commenting on the three Good Practice Advice notes, we ask the following questions:

Consultation questions

- 1 Do you think the topics selected for publication as Good Practice and Technical Advice in Planning are the right ones? If not, please list any topics which you consider should be included.
- 2 Does GPA 1 give sufficient information on sources of evidence to address the historic environment in drawing up a Local Plan? If not, please list any sources of evidence you consider are missing,
- 3 Does GPA 1 give sufficient and proportionate information and advice on how to develop a positive strategy for the conservation and enjoyment of the historic environment for the Local Plan area? If not, please indicate how you consider it can be improved.
- 4 Are the steps given in paragraph 9 of GPA 2 on the sources of information that might be consulted, or the exercises that might be carried out in assessing significance, useful? If not, please list any others which you consider might usefully be added?
- 5 Do you consider that the advice in GPA 2 which applies specifically to listed buildings, including paragraphs 12 on curtilage and paragraphs (25- 29) on the recent changes to the listed building control system (under the ERR Act 2013) is helpful in managing change to these heritage assets? If not, please list any other factors which you consider could usefully be addressed.
- 6 Do you consider that the paragraphs in GPA 2 which apply specifically to assets with archaeological interest, including those on Archaeological and Historic Interest (13-14), and Decision-taking for Assets with Archaeological Interest (30-31) and the archaeological conditions included at paragraph 37 provide proportionate advice on the protection of non-designated heritage assets with archaeological interest? If not, please list any other factors which you consider could usefully be addressed.
- 7 Would the planning conditions included at paragraph 37 of GPA 2 be sufficient to ensure an appropriate level of archaeological work while being flexible enough to allow development to proceed in a reasonable and timely way?¹

- 8 Do you consider that the section on what makes development successful in its context (paragraph 58) covers the main matters in this regard? If not, please list any additional considerations you think should be included.
- 9 Does the way that GPA 3 - The Setting of Heritage Assets - is set out give clear steps to aid the assessment of setting, bearing in mind that the main concepts relating to setting are now housed in the Government's Planning Practice Guide (paragraph 18a-013)?
- 10 Have you any further comments to make on Good Practice Advice notes 1-3?

'These conditions are proposed as an alternative for the conditions in ***Circular 11/95: The use of conditions in planning permissions:***

54. The developer shall afford access at all reasonable times to any archaeologist nominated by the local planning authority, and shall allow him to observe the excavations and record items of interest and finds (*paragraphs 80-81*).

Conditions should not require work to be held up while archaeological investigation takes place, though some developers may be willing to give such facilities.

55. No development shall take place within the area indicated (this would be the area of archaeological interest) until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.

Developers will wish to ensure that in drawing up a scheme, the timetable for the investigation is included within the details of the agreed scheme.

If you require an alternative accessible version of this document (for instance in audio, Braille or large print) please contact our Customer Services Department:

Telephone: 0870 333 1 1 8 1

Fax: 01793 414926

Textphone: 0800 015 0516

E-mail: custcmers@english-heritage.org.uk

6. FURTHER GUIDANCE ON MAKING CHANGES TO HERITAGE ASSETS

142. This section illustrates the application of the policies set out in PPS5 in determining applications for planning permission, listed building and conservation area consent. The examples given are not a substitute for the process of understanding the particular significance of the affected assets and the impact upon that significance in each case. Each heritage asset and group of heritage assets has its own characteristics that are usually related to an original or subsequent function. These can include orientation, layout, plan-form, setting, materials, the disposition of openings, external detailing (with larger assets of groups of assets this might include street furniture) and internal fittings.

143. The limits imposed by the structure and features of the asset are an important consideration, as is an understanding of the significance of individual elements, derived both from the physical evidence and documentary sources.

144. There are various legal requirements that buildings have to comply with, such as Building Regulations and the Disability Discrimination Act. Sometimes the best means of conserving a heritage asset will seem to conflict with the requirements of such regimes. Local planning authorities are encouraged to consider imaginative ways of avoiding such conflict. Where conflict is unavoidable, such regimes generally allow for some flexibility so that a balance can be struck.

145. Where change is proposed to a heritage asset, it can usually be characterised as:

1. **Repair;**
2. **Restoration;**
3. **Addition and alteration**, either singly or in combination; and
4. **Works for research alone.**

146. The way of dealing with these types of intervention are considered for each of the following categories of heritage asset:

1. **Buildings and other structures;**
2. **Standing remains** including earthworks;
3. **Buried remains and marine sites**, including evidence of past environmental change, landscapes now submerged in rivers, estuaries and coastal areas to the low-water mark;
4. **Large heritage assets** including conservation areas, formal or informal landscapes at all scales, clusters of scheduled monuments and World Heritage Sites where the whole is greater than the sum of the parts.

Some heritage assets may fall into more than one category.

Repair

General points

147. With the exception of repairs to scheduled monuments, which will almost always need consent, minor repairs are unlikely to require planning permission or listed building consent (where relevant) if the works are carried out using the same materials and techniques and they do not affect the significance of the asset. The local planning authority will be able to advise.

148. Good conservation of heritage assets is founded on appropriate routine management and maintenance. Such an approach will minimise the need for larger repairs or other interventions and will usually represent the most economical way of sustaining an asset.

Buildings and other structures

149. Original materials normally only need to be replaced when they have failed in their structural purpose. Repairing by re-using materials to match the original in substance, texture, quality and colour, helps maintain authenticity, ensures the repair is technically and visually compatible, minimises the use of new resources and reduces waste. However, alternative approaches may be appropriate if it can be demonstrated that the technique will not cause long-term damage to the asset and results in less overall loss of original fabric and significance. An example may be the use of resin or steel reinforcements to stabilise structural timbers without loss of historic fabric. Repairs to a listed building may require consent. One would expect that the loss of historic fabric following repairs, and alteration, would be proportionate to the nature of the works.

150. Even when undertaking repair, care is needed to maintain the integrity of the asset. Some repair techniques, such as the use of cement-based mortars in place of softer lime, will affect the integrity of the existing building and cause permanent damage

to the historic fabric, as well as being visually unsympathetic. Repointing of historic mortar will normally leave the significance of the asset unaffected, provided the original mix and appearance is copied but care is often needed not to affect subtle changes in pointing. A change in the character of the pointing, or painting exposed surfaces including concrete, can be visually and physically damaging and is likely to require listed building consent, as may a change in external paint colour.

151. The removal of hard renders may cause more damage to the significance of the building than retention. In modern buildings cement render may be the original finish, and in such cases it is appropriate for it to be retained and matched when repaired. Features such as tool marks, carpenters' marks, smoke blackening, decorative painting, pargetting or sgraffito work are always damaged by sand-blasting and sometimes by painting or other cleaning, as is exposed timber. Such treatments are unlikely to be considered as repairs and would normally require listed building consent.

152. Doors and windows are frequently key to the significance of a building. Change is therefore advisable only where the original is beyond repair, it minimises the loss of historic fabric and matches the original in detail. Secondary glazing is usually more appropriate than double-glazing where the window itself is of significance. As with the building as a whole, it is more appropriate to deal with timber decay and similar threats by addressing the cause of

the decay rather than treating the symptoms, but where remedial works are shown to be necessary, minimum interference to achieve reasonable long term stability is the most sustainable approach.

153. Even the most minor repairs can sometimes have an impact on the archaeological interest of a heritage asset and may reveal new information relating to the significance of that asset. The recording of evidence revealed by such works may therefore be appropriate.

Standing remains

154. Beyond routine maintenance, required repairs are unlikely to be more than the addition of visually unobtrusive elements to give longer term protection, such as rough-racking or the soft capping of walls with turf, or a shelter coat of limewash or lead flashings, that can mitigate the effects of weathering and be replaced relatively regularly without affecting the earlier elements.

Buried remains, including marine sites

155. Repairs may be required as part of a general management regime, but care will be needed to ensure that they do not cause damage to the significance of the asset (particularly its archaeological interest).

Large heritage assets

156. The general principles apply. Carefully planned and phased repair programmes may assist in the long-term management of such assets by spreading costs and reducing the chances of unexpected works becoming urgently necessary.

157. In respect of parks and gardens, repair will generally be part of ongoing management of the land. Maintenance is essential to conserve the original fabric in good order and to safeguard design intentions. Breaks in maintenance may lead to failure of elements and necessitate repairs or sometimes restoration. Accurate repair following decay is likely to be justified as a means of perpetuating the design if there is sufficient record of that design to inform the repair and if the elements (trees, plants or other parts of the fabric) and the techniques used are close and high quality matches to the original. For battlefields, which are generally managed agricultural land, repair is likely to take the form of small-scale interventions e.g. maintaining walls, hedges or fences.

Restoration

General points

158. Restoration of a listed building requires its alteration and is almost always likely to need listed building consent and may require planning permission. The local planning authority will be able to advise potential applicants.

159. Restoration may range from small-scale work to reinstate missing elements of decoration, such as the reinstatement of sections of ornamental plasterwork to a known

design, to large schemes to restore the former appearance of buildings with the addition of major missing elements such as a missing wing. Previous repairs may be historically important, and may provide useful information about the structure of the building, as will the recording of any features revealed by the work. New work can be distinguished by discreet dating or other subtle means. Overt methods of distinction, such as tooling of stonework, setting back a new face from the old, or other similar techniques, are unlikely to be sympathetic.

160. Restoration is likely to be acceptable if:

1. The significance of the elements that would be restored decisively outweigh the significance of those that would be lost.
2. The work proposed is justified by compelling evidence of the evolution of the heritage asset, and is executed in accordance with that evidence.
3. The form in which the heritage asset currently exists is not the result of a historically-significant event.
4. The work proposed respects previous forms of the heritage asset.
5. No archaeological interest is lost if the restoration work could later be confused with the original fabric.
6. The maintenance implications of the proposed restoration are considered to be sustainable.

161. Restoration works are those that are intended to reveal or recover something of significance that has been eroded, obscured or previously removed. In some cases, restoration can thus be said to enhance significance. However, additions and changes in response to the changing needs of owners and occupants over time may themselves be a key part of the asset's significance.

162. In determining whether restoration is appropriate following catastrophic damage (e.g. from fire or flood) the practicability of restoration should be established by an assessment of remaining significance. Where the significance relates to a design concept or a particular event rather than held directly in the original fabric of the asset, restoration or replication is more likely to be acceptable.

Buildings

163. Restoration involving the stripping-off of later layers of work or abrasive cleaning is only likely to be acceptable where it can be shown that:

1. The later layers are not of significance in themselves.
2. They are damaging the original and other significant fabric.
3. By their removal there would be an enhancement to the significance of the building that outweighs the loss of the later addition.

164. Stripping off finishes such as plaster to expose rubble, brick or timber-framed walls never intended to be seen is likely to have an adverse effect on the building's significance through the loss of historic materials and original finishes and harm to the aesthetic. Where it is proposed to remove more modern coverings that are harmful to the significance or the integrity of the building, appropriate materials will need to be introduced to ensure an

authentic and/or suitably detailed finish is achieved, for example using mock jointing, or lining out, where there is evidence of the original finish. If there is any doubt as to the authentic finish, it is better to create a simple finish rather than one with speculative decoration. Sometimes early framing or finishes were covered up because they were in a poor state and unacceptable loss of original fabric may result from works to make the earlier surface visually acceptable.

165. Replacement of one material by another, for example on roofs, may result in a loss of significance and will in those cases need clear justification. Therefore, while the replacement of an inappropriate and non-original material is likely to be easily justified, more justification will be needed for changes from one type of thatch, slate or tile to another. For thatch, for example, preserving the covering on multi-layered roofs,

particularly where the bottom layer is smoke-blackened, is likely to be necessary in order to maintain the historic and archaeological significance of the building. Only the top coat may need to be replaced. Following the type and form of thatch traditional to the region with local ways of detailing eaves, ridges and verges will sustain the building's significance. English Heritage has published specific guidance on thatching: *Thatch and Thatching: A Guidance Note* (English Heritage, 2000).

166. Many building types have much published information on appropriate restoration techniques. Timber-framed buildings, for example, have been well-researched and appropriate conservation approaches have been shown to work very well while minimising loss of original fabric and structural integrity. Secondary elements, such as the infilling of timber frames, are of value and their retention will maintain the integrity of the whole building. The reuse of original materials whenever possible will meet conservation and other sustainability objectives.

167. The legibility of names on war memorials is important and their re-cutting and/or re-painting in an appropriate manner are likely to be acceptable. For other inscriptions, conservation rather than restoration may be preferred, where the original script is significant.

168. If convincing evidence is available it may be appropriate to take opportunities to reinstate missing architectural details, such as balustrades and cornices or missing elements of a decorative scheme, using traditional methods and materials.

Standing remains

169. Restoration, as opposed to repair, may be appropriate where there is compelling evidence of the former state of the structure and demonstrable benefits to the significance of the standing remains would result. By weighing the merits against any harm caused, including to the archaeological interest, the acceptability of such an approach can be established.

170. The local planning authority will need to carefully balance the long-term benefits of bringing a ruined structure back into use with the impact on significance of the direct damage to the fabric that might result from restoration.

171. Restoration of elements to benefit the ongoing management and conservation of earthworks, such as infilling gaps in earth mounds, vegetation clearance or dealing with the effects of burrowing animals may be justified.

Buried remains including marine sites

172. Restoration of buried remains is unlikely to be acceptable. If the remains still form a structure (perhaps in the form of foundations), work to remove the soil overburden and expose the remains may be justified, but will need to be balanced against the likely

threat to the sustainability and archaeological interest of the asset. Leaving the site undisturbed is usually the preferred solution. Where the goal is to illustrate the past or educate, interpretation panels that illustrate the site's significance could provide a more appropriate solution.

173. For marine sites, repair and restoration for wreck structures are unlikely to form a significant part of their management, but stabilisation and erosion protection strategies may be appropriate to sustain their integrity and could be included in the Marine Plans that will be developed by the Marine Management Organisation under the Marine and Coastal Access Act (2009). Heritage Partnership Agreements may also be of assistance to ensure the long-term future of the site is understood and, so far as is practicable, managed in the best interest of its conservation.

Large assets

174. An inconsistency of approach to repair and restoration because of different ownership, spatially or over time, or in methods and techniques may result in a loss of significance by obscuring the historic or aesthetic connection between elements within the asset and affect the evidential value of the asset as a whole. It may be possible to achieve consistency through a heritage partnership agreement.

175. The spaces between the buildings within an area asset may be important and may be consciously designed (such as a town square); have developed over a period of time (such as parkland surrounding a country house); or, be the space between similar assets with some other link, such as a variety of earthworks on downland. Restoration of individual elements within a group of assets is more likely to enhance the group if the effect on the other assets has been considered from the outset. Restoration of a designed space is more likely to meet the PPS criteria, especially where there is public benefit, for example in the re-creation of the historic street pattern, including widths of streets and plots and heights of buildings and storeys, following the removal of a later development that was unsympathetic to the urban grain. The case for restoration will be stronger where it can be shown that the restoration improves the appreciation of the space and the settings of the assets that are linked to it.

176. Restoration may be acceptable in historic parks and gardens where the original design has been obscured despite regular maintenance, and where it is possible to establish the

original design through research and investigative work, and the work does not diminish the significance of the asset.

177. The significance of historic battlefields will usually result from evidential and associative value that depends on the ability to appreciate the location, topography and setting of the site. Restoration may involve removing later additions and features, or reinstating known earlier features. The sensitivity of any archaeological interest in the site will be important when considering whether any restoration is appropriate.

Addition and alteration

General points

178. The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, are proportion, height, massing, bulk, use of materials, use, relationship with adjacent assets, alignment and treatment of setting. Replicating a particular style may be less important, though there are circumstances when it may be appropriate. It would not normally be acceptable for new work to dominate the original asset or its setting in either scale, material or as a result of its siting. Assessment of an asset's significance and its relationship to its setting will usually suggest the forms of extension that might be appropriate.

179. The fabric will always be an important part of the asset's significance. Retention of as much historic fabric as possible is therefore a fundamental part of any good alteration or conversion, together with the use of appropriate materials and methods of repair. It is not appropriate to sacrifice old work simply to accommodate the new.

180. The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However, reversibility alone does not justify alteration. If alteration is justified on other grounds then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place.

Buildings and structures

181. When a building is adapted for new uses, its form as well as its external and internal features may impose constraints. Some degree of compromise in use may assist in retaining significance. For example, headroom may be restricted and daylight levels may be lower than usually expected.

182. The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations.

183. The sub-division of buildings, such as threshing barns and churches, that are significant for their open interiors, impressive proportions and long sight lines, may have a considerable impact on significance. In these circumstances the use of pods or other design devices that allow the entirety of the space to be read may be appropriate.

184. The introduction of new floors into a building or removal of historic floors and ceilings may have a considerable impact on an asset's significance. Certain asset types, such as large industrial buildings, are generally more capable of accepting such changes without unacceptable loss of significance.

185. The insertion of new elements such as doors and windows, (including dormers and roof lights to bring roof spaces into more intensive use) is quite likely to adversely affect the building's significance. Harm might be avoided if roof lights are located on less prominent roof slopes. New elements may be more acceptable if account is taken of the character of the building, the roofline and significant fabric. Rooflights may be more appropriate in agricultural and industrial buildings than dormers. In some circumstances the unbroken line of a roof may be an important contributor to its significance.

186. New features added to a building are less likely to have an impact on the significance if they follow the character of the building. Thus in a barn conversion new doors and windows are more likely to be acceptable if they are agricultural rather than domestic in character, with the relationship of new glazing to the wall plane reflecting that of the existing and, where large door openings are to be glazed, with the former doors retained or replicated so that they can be closed.

187. Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance.

188. Extant flooring materials will often be of interest in themselves. Additional care is needed on lower floors to ensure that archaeological interest below the finished surface is not adversely affected by proposed works.

189. Although some works of up-grading, such as new kitchens and bathroom units, are unlikely to need consent, new services, both internal and external can have a considerable, and often cumulative, effect on the appearance of a building and can affect significance. The impact of necessary services can be minimised by avoiding damage to decorative features by carefully routing and finishing and by use of materials appropriate to the relevant period, such as cast iron for gutters and down-pipes for many Georgian and Victorian buildings.

190. Removal of, and change to, historic shopfronts may damage the significance of both the building and the wider conservation area, as may the introduction of new shopfronts to historic buildings where there are none at present. All elements of new shopfronts (stall-risers, glazing, doors, fascias etc.) may affect the significance of the building it is located in and the wider street setting. External steel roller shutters are unlikely to be suitable for

historic shopfronts. Laminated glass and internal chain-link screens are likely to be more appropriate alternatives in most instances.

191. Where the proposal involves a change of use, particularly to single or multiple residential units, local planning authorities may consider that the impact on the building and its setting of potential future permitted development, such as conservatories, garden sheds and other structures associated with residential use, make the change of use proposal unacceptable in principle. Conditions preventing or limiting such future permitted development may make the change of use proposal acceptable.

192. Buildings will often have an important established and historic relationship with the landscaping that exists or used to exist around them. Proposals to alter or renew the landscaping are more likely to be acceptable if the design is based on a sound and well-researched understanding of the building's relationship with its setting, both now and in the past.

Standing remains and buried remains including marine sites

193. New work and alterations are likely to be rare. There may be cases where a new structure enables the long-term care of the original asset or its interpretation and conservation, or where alterations may assist the long-term conservation of the asset. Works other than those of a minor nature are likely to be acceptable only where they would be in the best long-term interests of the conservation of the remains, or, there are other important planning justifications. Any additions or alterations to marine sites or sites affecting the marine area must be made in accordance with the Marine Policy Statement and relevant Marine Plan.

Large assets

194. The same principles will apply, where appropriate, as those set out for buildings, standing remains, buried remains, marine sites and landscapes. The retention and restoration of surfacing and street furniture sometimes makes a very positive contribution to the character and appearance of a conservation area. Quality of place can be enhanced where opportunities are taken for the re-introduction of missing elements in adjacent areas, if there is historical evidence for them. The local tradition in scale, texture, colour and laying patterns will inform appropriate new paving, with the traditional relationship between footways and carriageways retained.

195. The varying degrees of sensitivity to change within landscapes can normally be identified and incorporated into alterations and additions in ways that will enhance the asset's significance. Some landscapes will be so sensitive that the degree of alteration or addition possible without loss of significance may be very limited, particularly where there is a consistently high level of archaeological interest or architectural consistency.

Works for research alone

196. A research investigation involving intrusive works to an asset requiring permission or consent may be proposed as a stand-alone project and not merely as an exercise in

investigating an asset that will be lost or altered for other reasons. It may be justified if there will be a public benefit gained if the investigation results in an increased understanding of our past and this will be maximised if it is well planned, executed and the results properly publicised and disseminated. Guidance on how to secure the best results from an investigation is set out above. For further information see *Understanding Historic Buildings: Policy and Guidance for Local Planning Authorities*, English Heritage (2008).

197. Any intrusive investigation may reduce the significance of an asset and impair the available resource for future archaeological investigation. It may also affect the historic and aesthetic values of the asset. Factors worthy of consideration when looking at the balance of the public benefit from the investigation and that loss of significance include:

1. whether at least part of the investigation can be achieved using non-destructive techniques;
2. whether the understanding sought could be found elsewhere, perhaps from another site where destruction is inevitable;
3. the likelihood of the investigation yielding critical evidence to our understanding of the past; and,
4. the predicted rate of environmental decay of the asset.

Metal-detecting on a scheduled monument for any reason requires a licence and intrusive investigation for research purposes will require scheduled monument consent. Further guidance is published by DCMS and advice can be sought from English Heritage.