



Primitive Methodist Church, New Road, Alton, Staffordshire

Heritage Statement

April 2024



Primitive Methodist Church, New Road,
Alton, Staffordshire

Heritage Statement

Project No: 24_1252_001

Sign-off history

issue no.	issue date	prepared by	reviewed by	approved by	reason for issue
1	02/04/2024	RB	MS	-	Draft
2	03/04/2024	-	RB	-	Revision
3	03/04/2024	-	RB	Client	Issue

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Executive Summary

Aurora Heritage Planning Ltd have been commissioned by clients to produce a Heritage Statement in support of a planning application (SMD/2024/0030) for the change the use of a currently vacant site to a holiday let at Primitive Methodist Church, New Road, Alton, Staffordshire, ST10 4AF (the site). The site is a non-designated heritage asset within the Alton and Farley Conservation Area and is within the setting of nearby designated heritage assets.

This report outlines the development and has considered its impact on the site itself and surrounding designated and non-designated heritage assets. This report outlines the significance of the heritage assets, including the contribution made to significance by setting and considers the impact of the development on that significance.

Whilst the site has been the subject to change over time; its overall significance has remained unharmed. It is determined that the proposed development will have no negative impact on the significance of the site, Conservation Area nor the setting of the surrounding heritage assets and will cause no harm.

The scheme is considered to accord in full with legislation and national and local heritage policy and guidance.

1. Introduction

- 1.1. Aurora Heritage Planning Ltd have been commissioned by clients to produce a Heritage Statement in support of a planning application (SMD/2024/0030) for the change the use of a currently vacant site to a holiday let at Primitive Methodist Church, New Road, Alton, Staffordshire, ST10 4AF (the site).
- 1.2. This report assesses the significance of the site and the built heritage assets (standing buildings) within the immediate and wider vicinity of the site. Impacts on significance, if applicable, will be identified and the level of harm which may occur as a result of the proposed development assessed. This report should be read alongside the other supporting documents that were submitted as part of the application package, for comprehensive details about all other matters.
- 1.3. The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2023) and to standards specified by the Institute for Archaeologists (ClfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015) and the Institute of Historic Building Conservation (IHBC 2009).
- 1.4. Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author, correct at the time of writing.
- 1.5. Archaeology is scoped out of this report.

2. Site Context

- 2.1 The site is situated along New Road, Alton, the main thoroughfare between Alton and Farley (National Grid Reference (NGR): SK 07239 42265). It is located c. 41m north from Alton's High Street.

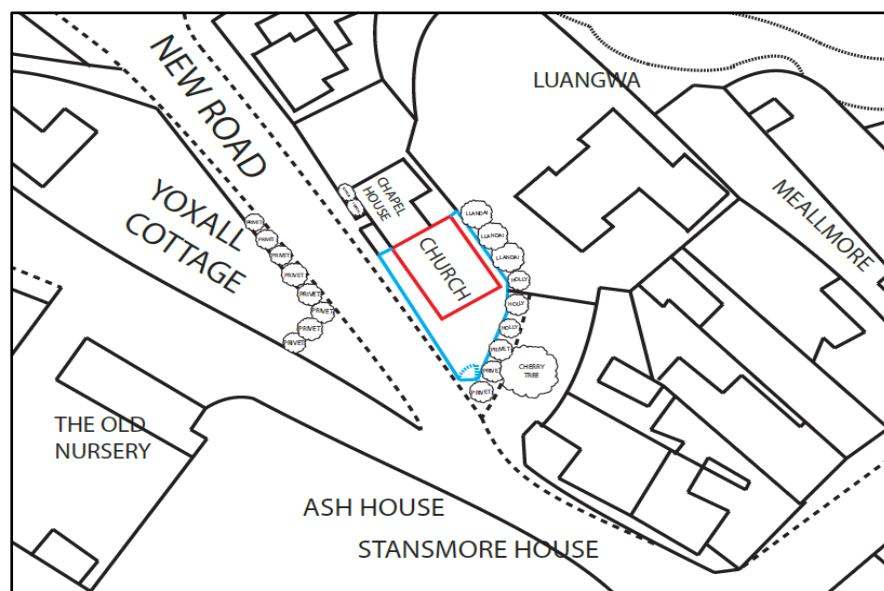


Figure 1: Site location, site outlined in red. Source: Client.

- 2.2 The site boundary runs along a public footpath along New Road to the west and abuts Chapel House on the northern elevation. There are residential dwellings to the south and southeast of the site.

DESIGNATED HERITAGE ASSETS

- 2.3 The site is situated within the Alton and Farley Conservation Area, a designated heritage asset, and is within the immediate vicinity of several other designated heritage assets (Figure 2). The term “immediate vicinity” relates to the asset’s distance to the site, its relative proximity, and key views to the site, therefore any heritage assets which do not meet this criteria are scoped out of consideration as there will be no impact on their setting or significance.

Alton and Farley Conservation Area

- 2.4 Alton and Farley Conservation Area was designated in 1971. The construction and type of buildings within Alton Village are described in the Alton and Farley Conservation Area Appraisal as “diverse in character, date and spacing. This reflects the historic development of the settlement, the topography, and

piecemeal construction by numerous owners in a variety of materials".



Figure 2: Designated heritage assets within the immediate vicinity of the site identified in blue. Site outlined in red.

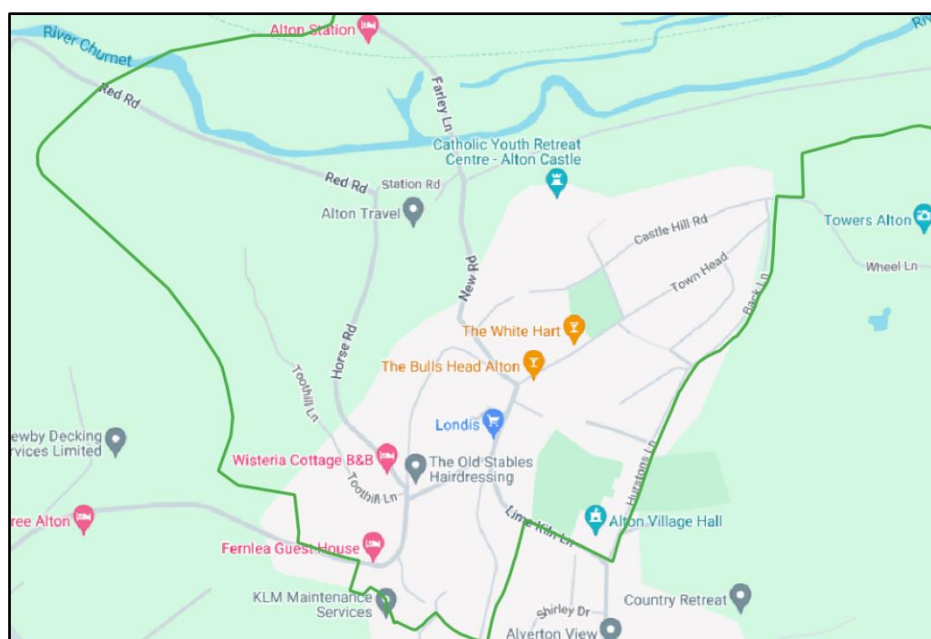


Figure 3: Part of Alton and Farley Conservation Area outlined in green.

2.5 The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest. In accordance with Table 1 (Appendix B), this heritage asset is

determined to be of **medium** significance, as a baseline.

ASH HOUSE, NEW ROAD (Grade II: 1037894)

- 2.6 This heritage asset is situated c. 16m southeast from the site. The Historic England listing description states the following:

House. Early C18 remodelled early to mid-C19. Ashlar with herringbone tooling; plain tile roof with coped verge; ashlar integral end stack. Aligned north-west/south-east facing south-west. 2 storeys with chamfered eaves band; 2 bays, 2-light chamfer mullioned windows to first floor containing casements, 3-light chamfer mullioned window to ground floor right, casement to ground floor left within the C19 surround of a former mullioned window. Entrance to the lefthand gable. Ash House adjoins Stansmore House (q.v.) to the left.

- 2.7 The building is a listed Grade II designated heritage asset and as such is of **medium** significance, as a baseline. The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest. It also has group value with Stansmore House.

STANSMORE HOUSE, NEW ROAD (Grade II: 1191282)

- 2.8 This heritage asset is situated c. 30m southeast from the site. The Historic England listing description states the following:

Early C18 remodelled early to mid-C19. Ashlar with herringbone tooling; plain tile roof with coped verges; ashlar integral end stacks. Aligned north-west/south-east facing south-west. 2 storeys with chamfered eaves band; two 2-light chamfer mullioned windows containing casements to first floor, 3 casements to ground floor retaining C19 surrounds and the stubs of former mullions; door to right with massive lintel.

- 2.9 The building is a listed Grade II designated heritage asset and as such is of **medium** significance, as a baseline. The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest. It also has group value with Ash House.

1, HIGH STREET (Grade II: 1037922)

- 2.10 This heritage asset is situated c. 38m southeast from the site. The Historic England listing description states the following:

Dated 1771 with later alterations. Red brick with ashlar plinth and quoins of unequal length; plain tile roof with coped verges; brick integral end stacks. Aligned north-east/south-west facing south-east. 2 storeys; 2 windows, glazing bar casements with wedge lintels, large C20 window to ground floor left with cornice hood; half-glazed door to left of centre replacing a blocked doorway immediately to the right of it with lintel inscribed G I E No. 1 High Street occupies a prominent corner position 1771 at the junction with New Road and is included for group value.

- 2.11 The building is a listed Grade II designated heritage asset and as such is of **medium** significance, as a baseline. The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest. It also has group value with the heritage assets along High Street.

THE WHITE HOUSE, NEW ROAD (Grade II: 1037895)

- 2.12 This heritage asset is situated c. 35m south from the site. The Historic England listing description states the following:

Early C19. Stucco lined as ashlar; hipped slate roof; brick integral end stacks. Aligned north-west/south-east facing north-east. 2 storeys; 3 windows, 3-light flat-face mullioned windows containing casements, the central light wider; central half-glazed door with Tuscan porch.

- 2.13 The building is a listed Grade II designated heritage asset and as such is of **medium** significance, as a baseline. The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest.

NON-DESIGNATED HERITAGE ASSETS (NDAS)

- 2.14 According to the Staffordshire Historic Environment Record (HER), the site is a

non-designated heritage asset (MST19148), and its significance is assessed in Section 5.

Chapel House (MST19149)

- 2.15 The HER also identifies Chapel House as a NDA which immediately abuts the site to the north. The significance of this heritage asset is largely derived from its age and intactness of built fabric which contributes to its historical and architectural interest, however modern materials have replaced many original features.
- 2.16 NDAs in the wider vicinity have been scoped out of consideration as there will be no potential for permanent impact on the setting of these assets.

SETTING

- 2.17 Setting is generally considered as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF 2023 Glossary).
- 2.18 A setting is not an asset in its own right, nor does it have significance unless part of another heritage designation. Setting, in this instance, is contiguous with the Conservation Area.
- 2.19 The contribution of setting is generally considered with reference to the Historic England document Good Practice Advice in Planning Note 3 The setting of heritage assets (3rd edition 2020) (GPA3).

3. Planning History

- 3.1 According to the Staffordshire Moorlands District Council planning portal, there has been one previous planning application for this site for an extension to form a W/C and kitchen which was approved in 1991. This extension was constructed on the southeast elevation of the original structure.

4. Historic Background

- 4.1 This section explores a brief history of the area with a view to understanding the site in its historical context.
- 4.2 Evidence suggests settlements in Alton as early as the 8th century, with an Iron Age fort on Bunbury Hill and a Saxon fortress built by King Ceolred of Mercia. The village's name itself, Alton, has Anglo-Saxon origins, meaning "Aelfa's farmstead." It was also known as "Alveton" and appeared in the Domesday Book of 1086 as "Elvetone," signifying land large enough for two ploughs.
- 4.3 Following the Norman Conquest in the 11th century, Alton Castle was constructed. Built in c.1175 by Bertram de Verdun, it stood on a hill overlooking the Churnet Valley. The ownership of the manor and castle passed through several families, including the Verduns, Furnivalls, and Nevills, before coming into the possession of the Talbots, the Earls of Shrewsbury, in the 14th century.
- 4.4 In 1406, Sir John Talbot acquired the Alton estate through marriage. The 15th Earl, Charles Talbot, played a pivotal role in the 18th century, undertaking a project to transform the landscape and developing Alton Towers. With the help of skilled workers, he created the foundation for the future theme park.
- 4.5 The 16th Earl continued the development of Alton Towers, employing the renowned architect Augustus Pugin to design a Gothic Revival mansion. The iconic theme park gradually grew around this mansion.
- 4.6 The village of Alton thrived alongside the development of Alton Towers. It boasted a railway station (open from 1849 to 1965) and industries like copper works. The village also has several notable buildings, including St Peter's Church, The Malt House, St John's Church, and the Round House.
- 4.7 Today, Alton remains a charming village, forever linked to the history and fame of Alton Towers. The village itself offers a glimpse into the past with its architectural heritage, while the theme park carries on the legacy of the transformative vision of the Earls of Shrewsbury.
- 4.8 The following figures are ordnance survey maps of the site which show the

development of the site and its immediate surroundings. Subsequent maps lack enough detail and/or are within copyright, therefore are not reproduced.

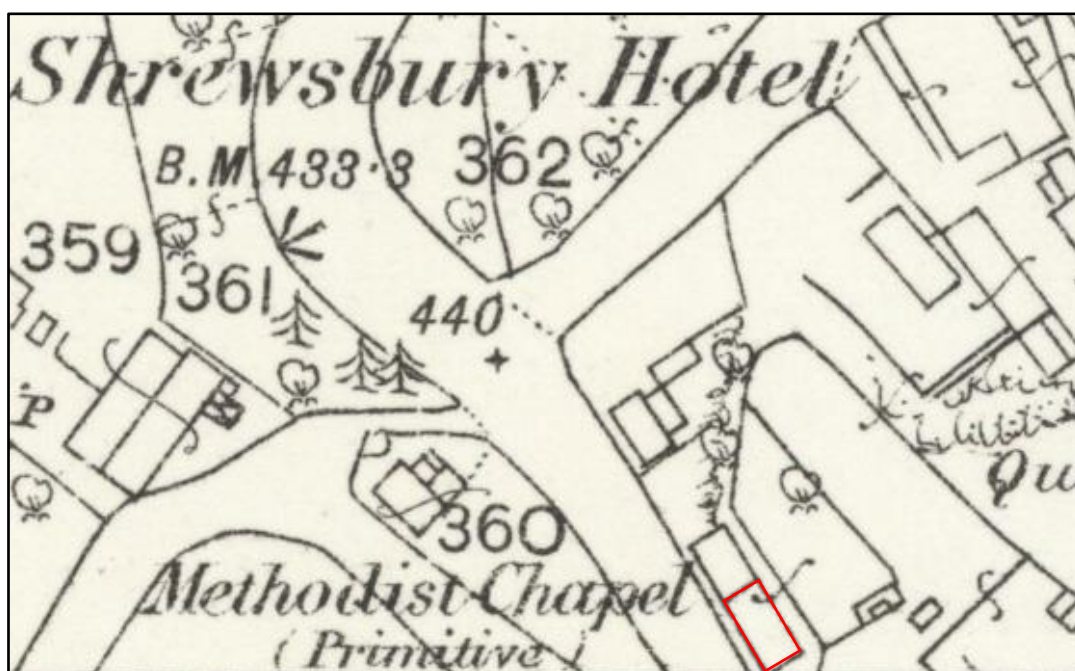


Figure 4: 1879 Ordnance Survey map showing the site (in red) and its immediate environs. Reproduced with the permission of the National Library of Scotland.



Figure 5: 1898 Ordnance Survey map showing the site (in red) and its immediate environs. Reproduced with the permission of the National Library of Scotland.

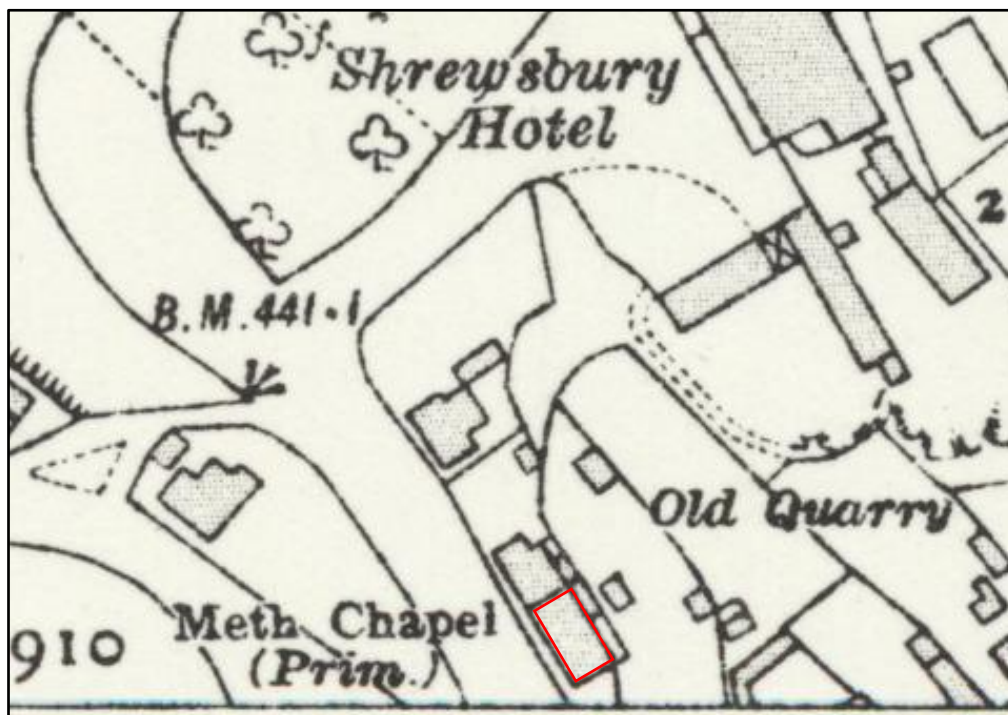


Figure 6: 1920 Ordnance Survey map showing the site (in red) and its immediate environs. Reproduced with the permission of the National Library of Scotland.

5. Statement of Significance

- 5.1 The determination of the significance of historic assets is based on statutory designation and/or professional judgement against 4 'values' (English Heritage/Historic England - 2008/2015) restated in the advice document GPA 2 - Managing Significance in Decisions.

The 4 values are:

- Evidential value
- Aesthetic value
- Historical value
- Communal value

(This is refined by National Planning Policy Guidance (PPG), last updated in September 2023).

- 5.2 A site visit was undertaken on 20 March 2024 to ascertain the current condition of the building, to assess significance and understand the building within its context. Please refer to Appendix A for plates.
- 5.3 The site is described in the Alton and Farley Conservation Area Appraisal as a simple brick chapel built on New Road in 1826, "with an attached house intended for the use of the minister". The construction of the chapel in the 19th century provides evidence of the expansion and evolution of Primitive Methodism in Alton. It is also evidence of the need for a space in Alton in which locals could worship together.
- 5.4 The four windows on the host building are likely to be original, as is the brickwork, therefore the structure provides evidential value in the form of historic building techniques.
- 5.5 An extension was approved for construction in 1991 on the southeasterly elevation which does attempt to flow with the original structure. The date stone was likely moved from its original position to be included in the new extension.

- 5.6 Primitive Methodists stressed simplicity in their chapels and their worship, as opposed to Wesleyan Methodists. This is clearly evident in its built form not being particularly grand or decorative, the building is barely noticeable on the approach to New Road from High Street. There is little to no aesthetic value.
- 5.7 The scale and proportionality of this chapel illustrates the Primitive Methodist's desire for simplicity in their chapels. It also illustrates the importance that the Methodists placed on their faith being more about worship and community rather than the building in which they worship. In addition, it illustrates the need for a space in which locals could worship together in a rapidly expanding area.
- 5.8 Regarding communal value, the chapel was a crucial focus for worship and outreach activities; however, it has not been a building utilised for worship for a few years. It is also important to appreciate that Primitive Methodists did not attach strong connections to buildings, preferring to worship from the heart.

6. Impacts

PROPOSED DEVELOPMENT

6.1 The proposed development includes, but is not limited to, the following aspects:

- Repair/replacement of all windows and front door like for like with timber.
- Replacement and extension of kitchenette plasterboard and studwork partition.
- Installation of new kitchen to include all associated works such as creating holes for plumbing.
- Installation of a free-standing mezzanine floor with stairs and railings.
- Removal of the ceiling to expose the original oak beams.

6.2 The figures below have been selected to provide an overarching view of the works to ascertain if there will be any heritage impact. Please refer to the supporting documents for comprehensive details.

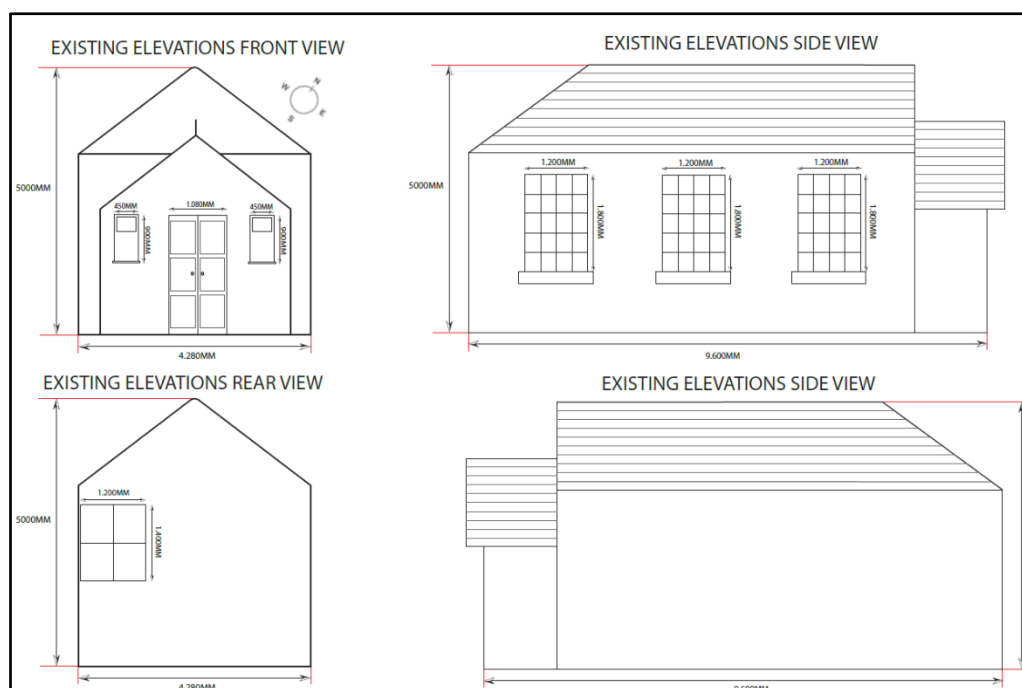


Figure 7: Existing elevations. Source: Client.

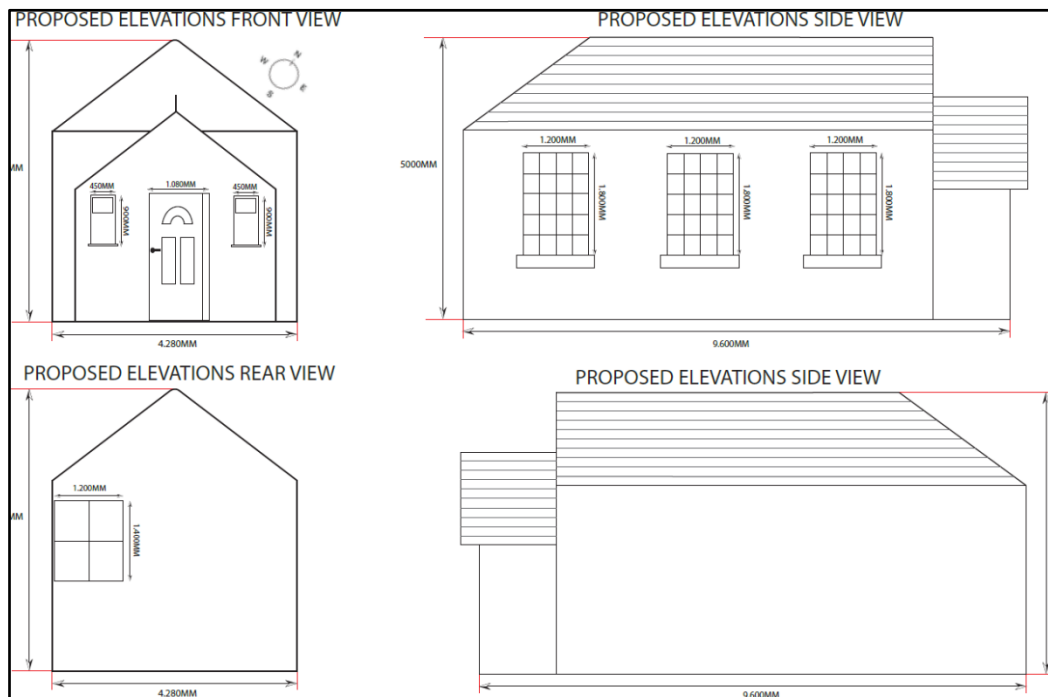


Figure 8: Proposed elevations. Source: Client.

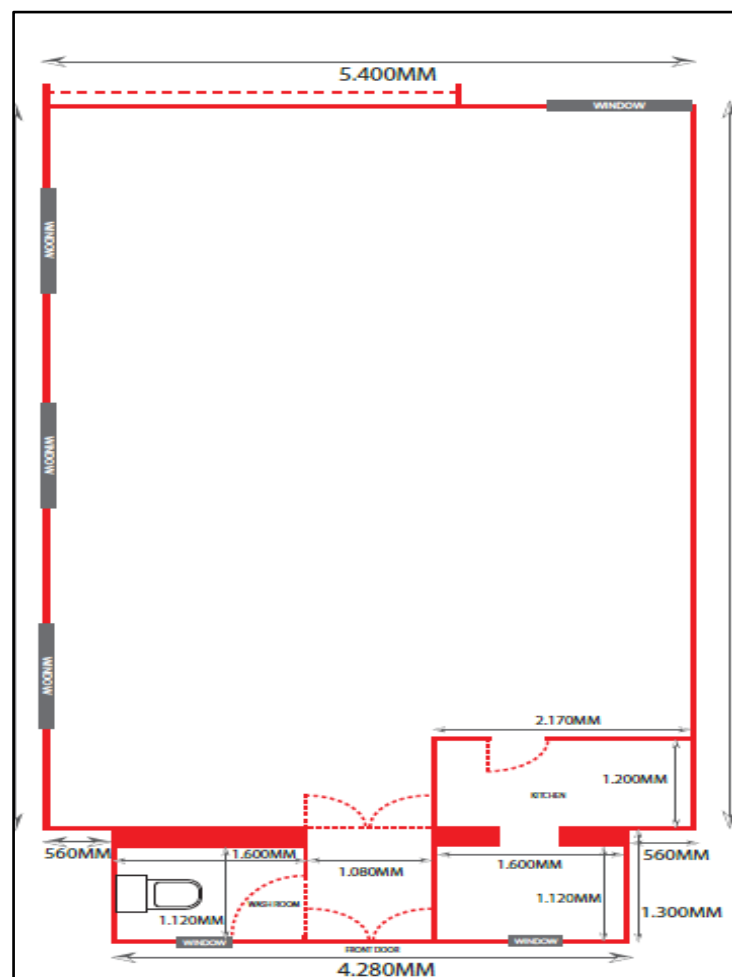


Figure 9: Existing floorplan. Source: Client.

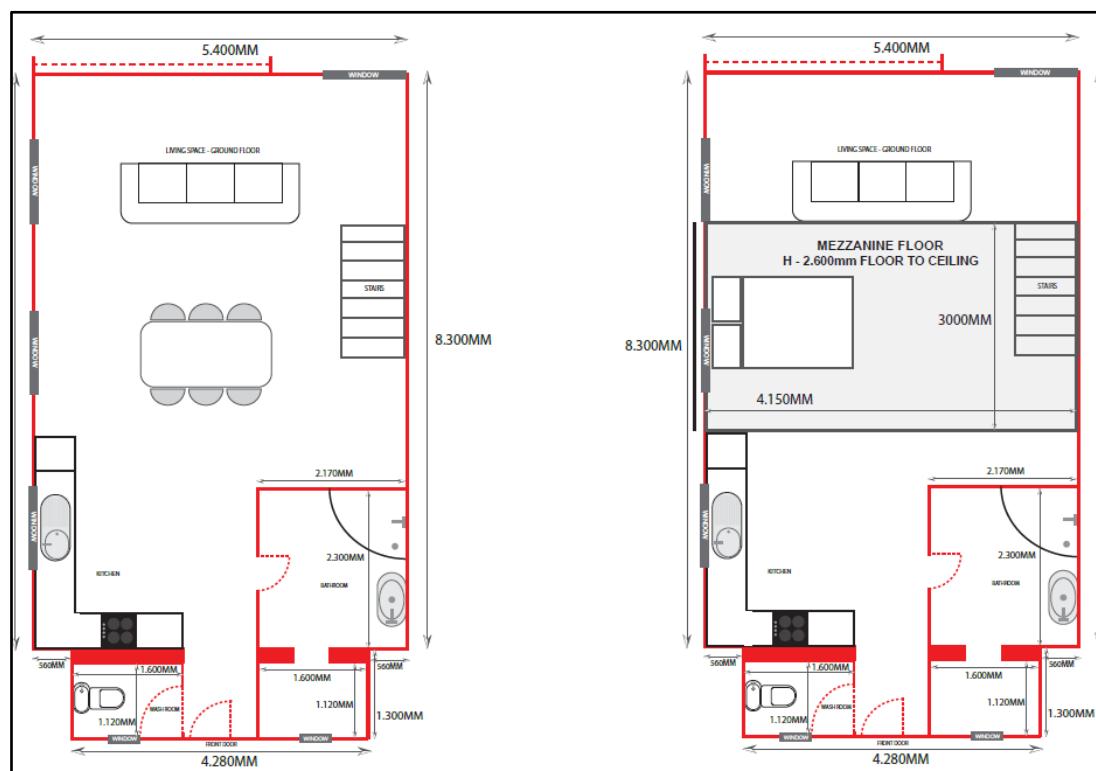


Figure 10: Proposed floorplan. Source: Client.

THE SITE

- 6.3 The original footprint of the building is being retained. Where possible, the windows and door will be repaired. Where repair is not possible, the windows and door will be replaced with like for like timber.
- 6.4 The site's status as a NDA does not bring works that are otherwise not, under control, these include internal alterations. Possible implications of the stability of the building are a matter for building regulations, not Conservation. Regardless, it is noted that the existing fabric is being predominantly retained with the mezzanine floor being free standing and supported by structural columns from the ground. No anchorage is required to the walls and exposing the original oak roof timbers is considered to be an enhancement.
- 6.5 Through the considered design and use of sensitive materials, it is determined that the development will preserve the significance of the building and enhance the significance of its setting. The development maintains and

enhances the existing fabric and overall presence of the building.

DESIGNATED HERITAGE ASSETS

- 6.6 The external works are the only element which may affect the setting of the surrounding designated heritage assets. There is no change proposed to the footprint of the building and materials are to be repaired or replaced like for like.
- 6.7 Through the use of sympathetic materials which complement the aesthetic of the building and the Conservation Area, it is considered that the development will preserve and enhance the significance of the identified designated heritage assets.
- 6.8 After a brief period of time when the new materials will have worn in, there will be barely noticeable material change to the appearance of the asset. There has been change over time - clearly the significance of the principal asset remains unharmed; there is nothing to suggest that a watershed has been reached. The development, subject to this application, does not take on-going change beyond the tipping point. Change is part of the character of most long-standing heritage assets, as is the case here.

OTHER NON-DESIGNATED HERITAGE ASSETS

Chapel House

- 6.9 The external works are the only element which may affect the setting of Chapel House. There is no change proposed to the footprint of the building and materials are to be repaired or replaced like for like.
- 6.10 Through the use of sympathetic materials which complement the aesthetic of the building and the surrounding area, it is considered that the development will not impact on the significance of any NDAs and will in fact constitute an enhancement.

HARM

- 6.11 The NPPF, at paras 201 & 202, refers to harm to the significance of designated heritage assets. At para 203 it refers to NDAs.

- 6.12 It is considered that the development will cause **no harm** to the significance of any heritage asset. There will be change, but overall that change will be neutral. As there is no harm there is no duty to prove public benefit, etc.

7. Conclusions

- 7.1 The site is a NDA and is of **low** significance. It is situated within a Conservation Area and is within the setting of several designated heritage assets. Whilst the site has been the subject to change over time; its overall significance has remained unharmed.
- 7.2 Conversion of methodist chapels to residential buildings are becoming ever more popular with many people now changing how they practice their religion. Many methodist churches are no longer used for their original purpose, and there are many examples of them being successfully converted for residential use.
- 7.3 The proposed development includes the repair and (where repair is not possible) replacement of all windows and the front door with like for like timber, the replacement and extension of the existing kitchenette plasterboard and studwork partition, installation of new kitchen to include all associated works such as creating holes for plumbing and the installation of a mezzanine floor with stairs and railings which includes removal of the ceiling to expose the original oak beams.
- 7.4 Through use of sympathetic materials and considered design, it is determined that the proposed development will have **no negative impact** on the significance of the site, Conservation Area nor the setting of the surrounding heritage assets and will cause **no harm**. Overall, the development represents an enhancement which secures the building's optimal viable use.
- 7.5 The scheme is considered to accord in full with legislation and national and local heritage policy and guidance.

Appendix A: Plates



Plate 1: Chapel House and Methodist Chapel



Plate 2: The site, looking northeast



Plate 3: Streetscape, looking towards High Street

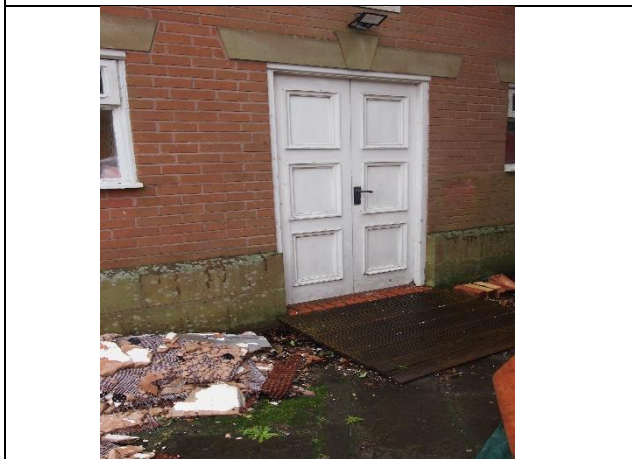


Plate 4: Front door

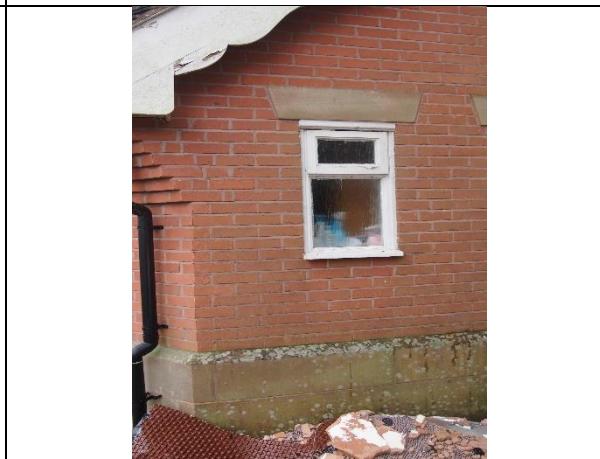


Plate 5: Timber windows on the extension



Plate 6: Date stone



Plate 7: Original window, facing New Road



Plate 8: Damaged windowsill



Plate 9: Exposed roof timbers

Appendix B: Methodology

Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

Evidential value: the potential of the physical remains to yield evidence of past human activity. This might consider date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.

Aesthetic value: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, considering what other people have said or written.

Historical value: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative.

Communal value: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely linked to with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

The tables below are used throughout this report to determine significance and impacts. Table 1 is used to assess significance, with magnitude of impact determined using Table 2. Table 3 consolidates the results from both Tables 1 and 2 to determine overall heritage impact.

VERY HIGH	· World Heritage Sites · Other buildings of recognised international importance
HIGH	· Scheduled Ancient Monuments with standing remains · All Grade I and all Grade II* Listed Buildings · Some Grade II listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in their listing grade · Conservation Areas containing very important buildings · Undesignated structures of clear national importance
MEDIUM	· Some Grade II Listed Buildings · Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations · Conservation Areas containing buildings that contribute significantly to its historic character · Historic townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
LOW	· Locally listed buildings · Historic (unlisted) buildings of modest quality in their fabric or historical association · Historic townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
NEGLECTIBLE	· Buildings of no architectural or historical note

Table 1: Assessment of Significance. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

HIGH	Changes to most or all of the key archaeological or key heritage baseline elements, or comprehensive changes to the setting of such key features that lead to total or almost complete alteration of a features' physical structure, dramatic visual alteration to the setting of a heritage asset, or almost comprehensive variation to aspects such as noise, access, or visual amenity of the historic landscape.
MEDIUM	Changes to many key archaeological materials/historic elements, or their setting, such that the baseline resource is clearly modified. This includes considerable visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, and considerable changes to use or access changes to key historic landscape elements.
LOW	Detectable impacts which alter the baseline condition of an archaeological or heritage receptor to a slight degree – e.g., a small proportion of the surviving heritage resource is altered; slight alterations to the setting or structure, or limited changes to aspects such as noise levels, use or access that results in limited changes to historic landscape character.
NEGLECTIBLE	Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, possibly because of distance from the development, method of construction or landscape or ecological planting, that are thought to have no long-term effect on the historic value of a resource.
UNKNOWN	Extent / nature of the resource is unknown and the magnitude of change cannot be ascertained.

Table 2: Magnitude of Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

MAGNITUDE OF IMPACT	SIGNIFICANCE OF HERITAGE ASSET				
	VERY HIGH	HIGH	MEDIUM	LOW	NEGLIGIBLE
No Change	Neutral	Neutral	Neutral	Neutral	Neutral
Negligible	Slight	Slight	Neutral/Slight	Neutral/Slight	Neutral
Low	Moderate/Large	Moderate/Slight	Slight	Neutral/Slight	Neutral/Slight
Medium	Large/Very Large	Moderate/Large	Moderate	Slight	Neutral/Slight
High	Very Large	Large/Very Large	Moderate/Large	Slight/Moderate	Slight

Table 3: Heritage Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

Appendix C: Planning and Heritage Framework

THE PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

This Act sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a Conservation Area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

NATIONAL PLANNING POLICY FRAMEWORK

The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was updated in 2023.

One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance also needs to be considered.

Section 16: Conserving and Enhancing the Historic Environment sets out the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

Paras 189 – 208 inclusive refer:

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These 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 (some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance).

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets are considered under para 194 on:

194. 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. 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.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- 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.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), 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.

Potential impacts are considered in para 199 on:

199. 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.

200. 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.

(Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets).

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, 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.

202. 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.

203. 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.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository).

206. Local planning authorities should 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. 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.

207. 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 200 or less than substantial harm under paragraph 201, 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.

208. Local planning 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 POLICY GUIDANCE (PPG)

PPG 15 (Planning and the Historic Environment) states that the demolition of any listed building should be wholly exceptional and should require the strongest justification. The general presumption should be in favour of retaining buildings which make a positive contribution. Where proposed works would result in the total demolition of the listed building, the following considerations should be addressed:

- (i) the condition of the building, and the cost of repairing and maintaining it in relation to its importance, and to the value derived from its continued use;
- (ii) the adequacy of efforts made to retain the building in use; and,
- (iii) the merits of alternative proposals for the site.

LOCAL POLICY

Staffordshire Moorlands Local Plan (2020)

The Staffordshire Moorlands Local Plan was adopted in 2020. It outlines the development strategy, strategic and development management policies and land designations for the District.

Policy DC2: The Historic Environment

In relation to heritage, this policy focuses on supporting the protection and enhancement of Staffordshire Moorlands' historic environment to ensure the continued attractiveness of the area. It states:

The Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.

