

HERITAGE STATEMENT AND IMPACT ASSESSMENT

**Proposed fabricated safety walkway and fire escape ladder including alteration to existing window to form doorway for means of escape to a
Grade II Listed Building within a Conservation Area**

Two Tubs Public House
19 The Wylde
Bury
BL9 0LA

Document Reference: 2717 – HIA

December 2025

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1.0 EXECUTIVE SUMMARY

- 1.1 The Two Tubs Inn (the building) is a historic Public House situated within the historic core of the Bury Marketplace. The building is a Grade II Listed Building which lies within the Bury Conservation Area and within close proximity to a number of designated and non-designated heritage assets.
- 1.2 The building is a functioning public house with accommodation and an office above at first floor level. The upper level is accessed by a single staircase which also serves as the only means of escape in the event of an emergency and terminates within the public house lounge area. The existing means of escape from the first floor is therefore currently inadequate in terms of formal compliance and safety to occupants. This places an element of risk on the viability of the building as it is not safe for use.
- 1.3 Proposals have therefore been prepared in order to provide a protected means of escape from the first floor direct to fresh air which can be used in the case of an emergency.
- 1.4 The proposals have the potential to impact on the heritage values, significance and setting of the listed building, the setting of neighbouring heritage assets and the character and appearance of the conservation area. Dickinson Waugh were therefore commissioned in order to assess the proposals and the impact, and this document has been prepared in satisfaction of that brief.
- 1.5 This document considers all reasonably available options and determines that the submitted proposals are the most appropriate in terms of achieving the overall objectives of the proposal with the least amount of harm. This document also contends that the harm is minor and decisively outweighed by public benefits.
- 1.6 This document has therefore assessed the proposals against the current national and local planning policy and considers that all conservation policy objectives and obligations have been met.

2.0 INTRODUCTION

2.1 Purpose

- 2.1.1 This Heritage Statement has been prepared in support of an application for Planning Permission and Listed Building Consent for works comprising the installation of a fabricated means of escape including alterations to an existing window to a a Grade II Listed Building which lies within a Conservation Area.
- 2.1.2 The purpose of this document is to assess the proposed works in relation to the statutory duties set out under Sections 16(2) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which require special regard to be given to the desirability of preserving the building, its setting, and any features of special architectural or historic interest it possesses.
- 2.1.3 The assessment seeks to demonstrate that the proposals have been informed by an understanding of the building's significance, and that they aim to conserve and, where possible, enhance the special interest of both the listed building and its wider historic context.

2.2 Methodology

- 2.2.1 This Heritage Statement and Impact Assessment has been prepared following the staged approach recommended by Historic England, whereby an understanding of significance of a site is used to inform and guide design development. The document is structured in three sections:

Section 1 – Background

This section provides a concise overview of the building's historical background and physical evolution. It includes a review of available documentary sources and a search of the local Historic Environment Record (HER) to establish the building's historic context.

Section 2 – Significance

Drawing upon the research presented in Section 1, this section assesses the building's heritage values in accordance with Historic England's guidance. It identifies and evaluates the relative significance of individual elements and the asset as a whole.

Section 3 – Proposals

This section demonstrates how an understanding of the building's significance has informed the design principles and proposed works. It explains how the proposals aim to conserve and, where possible, enhance the identified heritage values while minimising and mitigating any potential harm.

- 2.2.2 This assessment has been undertaken in accordance with the principles and guidance outlined in British Standard 7913:2013 – 'Guide to the Conservation of Historic Buildings', and with reference to Historic England's Historic Environment Good Practice in Planning documents,

including GPA1 'The Historic Environment in Local Plans', GPA2 'Managing Significance in Decision-Taking in the Historic Environment', and GPA3 'The Setting of Heritage Assets' (Second Edition). These documents collectively provide the recognised framework for understanding, assessing, and managing change within the historic environment.

- 2.2.3 Significance has been evaluated in accordance with the principles and methodology outlined in Historic England Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets, and the former English Heritage publication Conservation Principles, Policies and Guidance.
- 2.3 This document has been prepared by Daniel Waugh, a founding partner of Dickinson Waugh Architecture Ltd, with over 37 years of professional experience in the conservation and adaptation of historic buildings. Daniel holds a postgraduate degree in Architectural Conservation and serves as a lecturer at the University of Lancashire – Grenfell Bains Institute of Architecture teaching subjects including Architectural Technology (BSc) and Building Conservation and Adaptation (MSc). He is a Member of the Chartered Institute of Architectural Technologists (CIAT) and the Institute of Historic Building Conservation (IHBC).
- 2.4 A site survey and visual inspection of the site and surrounding area was carried out in December 2025. Background research was conducted with reference to the Bury interactive planning service, the Greater Manchester Historic Environment Record, historic mapping databases, archived material, and through discussions held with the architect. The assessment of the proposals will be conducted with reference to a range of texts, particularly the Historic England good practise guides and local authority's appraisal of the building and the conservation area.
- 2.5 The following drawings and documents have been assessed in the preparation of this document.

JDA Architecture

2272 01	Existing Plans & Elevations
2272 02	Proposed Plans & Elevations
2272 03	Site Location Plan

3.0 PLANNING POLICY

3.1 NATIONAL POLICY

- 3.1.1 Policy at national level is set out within the National Planning Policy Framework (NPPF, 2024). The following paragraphs of the NPPF are considered particularly relevant to the proposed development:

207. *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.

212. *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.*
213. *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*
215. *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.*
- 219 *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.*

3.2 LOCAL POLICY

3.2.1 The Development Plans applicable to the site includes the policies as set out in the Greater Manchester Places for Everyone Plan (adopted 2024), the Bury Unitary Development Plan (adopted 1997), and the emerging Bury Local Plan.

3.2.2 Policy JP-P2 'Heritage' of the GM Places for Everyone Plan requires that:

Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

3.2.3 Policy EN2 'Conservation and Listed Buildings' of the UDP:

The Council will seek to preserve the Borough's built heritage through the control of development, especially that affecting Conservation Areas, Listed Buildings and areas of local historical importance.

3.2.4 Policy EN2/1 'Character of Conservation Areas' of the UDP:

The Council will take action as appropriate to preserve or enhance the character or appearance of the Borough's Conservation Areas. The Council will be especially concerned with encouraging and, where appropriate, implementing measures to:

- *retain, replace and restore features of historical and architectural interest;*
- *retain and enhance existing landscape features including trees, parks and gardens;*
- *initiate and promote environmental improvement/enhancement schemes such as landscaping, refurbishment of street furniture, traffic management and pedestrian schemes;*
- *remove dereliction and bring unused land or buildings back into beneficial use;*
- *prepare and promote design guidelines to ensure sympathetic development.*

3.2.5 Policy EN2/2 'Conservation Area Control' of the UDP:

Development within a Conservation Area will only be acceptable if it preserves or enhances the special character or appearance of the area. In considering proposals for development in Conservation Areas, regard will be had to the following criteria:

- *the nature of the development in terms of its bulk, height, materials, colour, design and detailing;*
- *the relationship between the proposed development and the architectural and visual qualities of the surrounding area;*
- *where demolition is proposed, the contribution of any proposed new building to the character or appearance of the area as compared to the building to be demolished;*
- *in the case of the re-use of buildings or the introduction of new uses, the impact of the proposal on the character or appearance of the area and the fabric of the existing building.*

3.2.6 Policy EN2/3 'Listed Buildings' of the UDP:

The Council will actively safeguard the character and setting of Listed Buildings by not permitting works, alterations or changes of use which would have a detrimental effect on their historical or architectural character and features. Proposals for demolition will be opposed and will only be considered where it is demonstrated conclusively that the building(s) cannot be retained.

In considering applications for Listed Building Consent, the Council will have regard to the following criteria:

- *the impact of the proposal on the historic fabric of the building;*
- *the relationship of any extension to the Listed Building in terms of its height, size, design, and roofscape;*
- *the need to protect the setting of the Listed Building;*

- *the impact of associated ancillary facilities and infrastructure works.*

Policy LP-BE1 'Conservation Areas' of the Local Plan:

The Council will seek to preserve or enhance the character or appearance of the Borough's Conservation Areas and will be especially concerned with encouraging and, where appropriate, implementing measures to:

- Retain, replace and restore features of historical and architectural interest;*
- Retain and enhance existing landscape features including trees, parks and gardens;*
- Initiate and promote environmental improvement/ enhancement schemes such as landscaping, refurbishment of street furniture, traffic management and pedestrian schemes;*
- Remove dereliction and bring unused land or buildings back into beneficial use;*
- Prepare and promote design guidelines to ensure sympathetic development;*
- Preserve or enhance the special character or appearance of the area. In considering proposals for development in Conservation Areas, the Council will have regard to the following factors:*
- The nature of the development in terms of its bulk, height, materials, colour, design and detailing;*
- The relationship between the proposed development and the architectural and visual qualities of the surrounding area;*
- Where demolition is proposed, the contribution of any proposed new building to the character or appearance of the area as compared to the buildings to be demolished;*
- In the case of the re-use of buildings or the introduction of new uses, the impact of the proposal on the character or appearance of the area and the fabric of the existing building.*

Policy LP-BE2 'Listed Buildings' of the Local Plan:

The Council will actively safeguard the character and setting of Listed Buildings by not permitting works, alterations or changes of use which would have a detrimental effect on their historical or architectural character and features, or the special heritage characteristics associated with the building.

Proposals for demolition will be opposed and will only be considered where it is demonstrated conclusively that the building(s) cannot be retained.

In considering applications for Listed Building Consent, the Council will have regard to the following criteria:

- The impact of the proposal on the historic fabric of the building;*
- The relationship of any extension to the Listed Building in terms of its height, size, design, and roofscape;*
- The need to protect the setting of the Listed Building; and d. The impact of associated ancillary facilities and infrastructure works.*

Policy LP-BE5: 'Local non-designated heritage assets' of the Local Plan:

In considering proposals that have the potential to affect non-designated heritage assets contained on the 'Local List', the Council will make a balanced judgment on the proposal taking into account:

- a. The scale of any loss or harm to the locally significant heritage asset; and*
- b. The extent of the benefits that would arise from the proposal.*

The Council will refuse applications where the loss or harm is considered to outweigh the anticipated benefits.

4.0 LOCATION AND SITE INFORMATION



Figure 1. Site location plan, not to scale.

4.1 The Two Tubs Public House (the building / the Inn), formerly The Globe Inn* is a historic inn situated a national grid reference SD 80379 10866. The inn occupies a plot of approximately 605m² / 0.15 acres to the north of the Market Place at the junction of The Wylde and Castle Street.

* Historic mapping indicates that the building was also named The White Bear Inn during the middle part of the C19th.

4.2 The Inn is acknowledged as dating back to the C17th and possibly earlier although what remains of the earliest building is unclear. The building as it stands today appears later C18th/early C19th in character. The historic sections of the building comprise the 5-bay, two-storey single range structure along The Wylde. The two pitched out shuts to the rear and the single-storey historic ancillary building to the rear. At various stages through the C20th, the courtyard are appears to have been entirely infilled.



Figure 2. Painting of the White Bear Public House by James Shaw from closedpubs.com. Noted on the website as being present in 1811. The painting shows some similarity with the current building's first three bays.

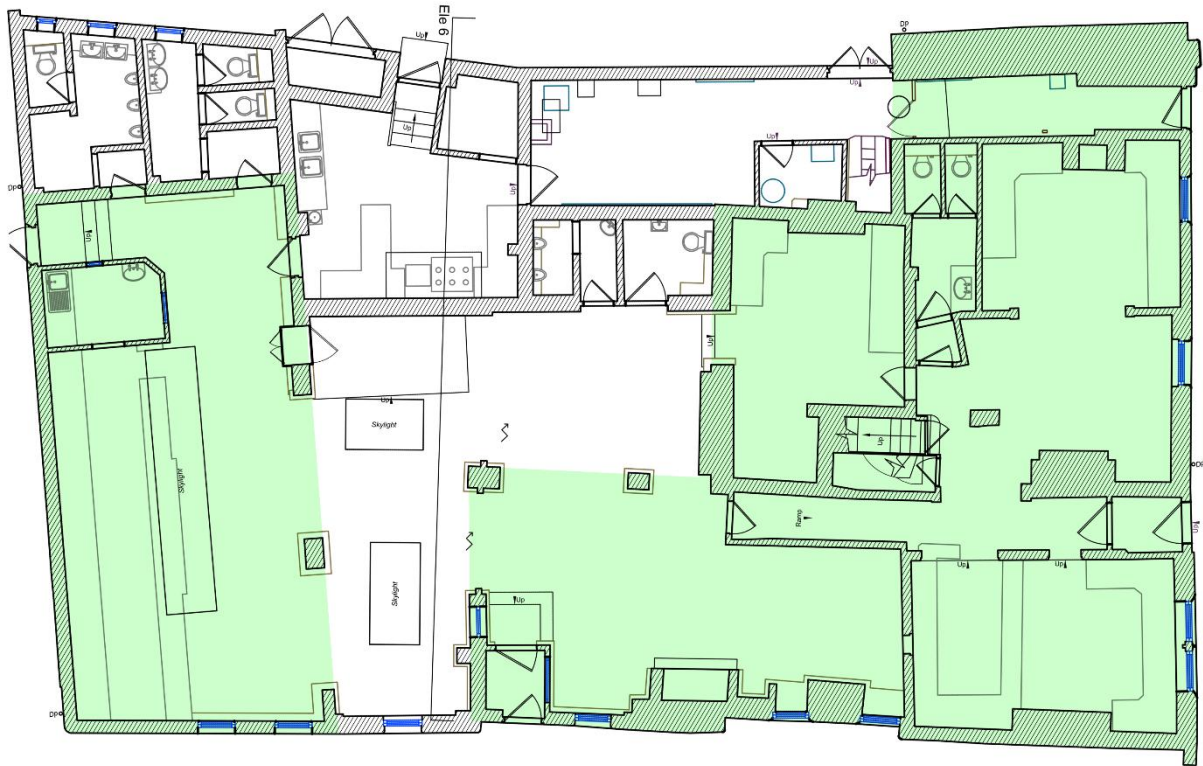


Figure 3. Existing ground floor plan indicating historic footprint evident on late C19th and early C20th mapping. The remaining structure appears entirely modern and comprising mostly of flat roof extensions.

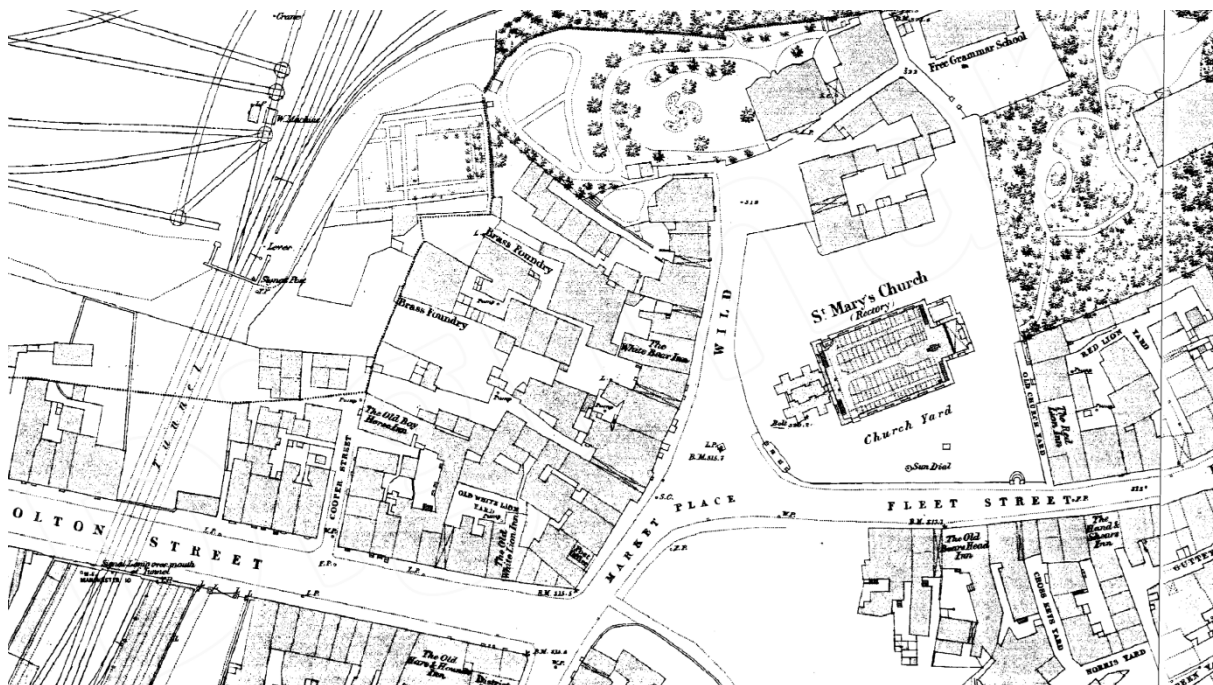


Figure 4. 1849 Bury Town Plan 1st edition. The building appears to be noted as 'The White Bear Inn'.

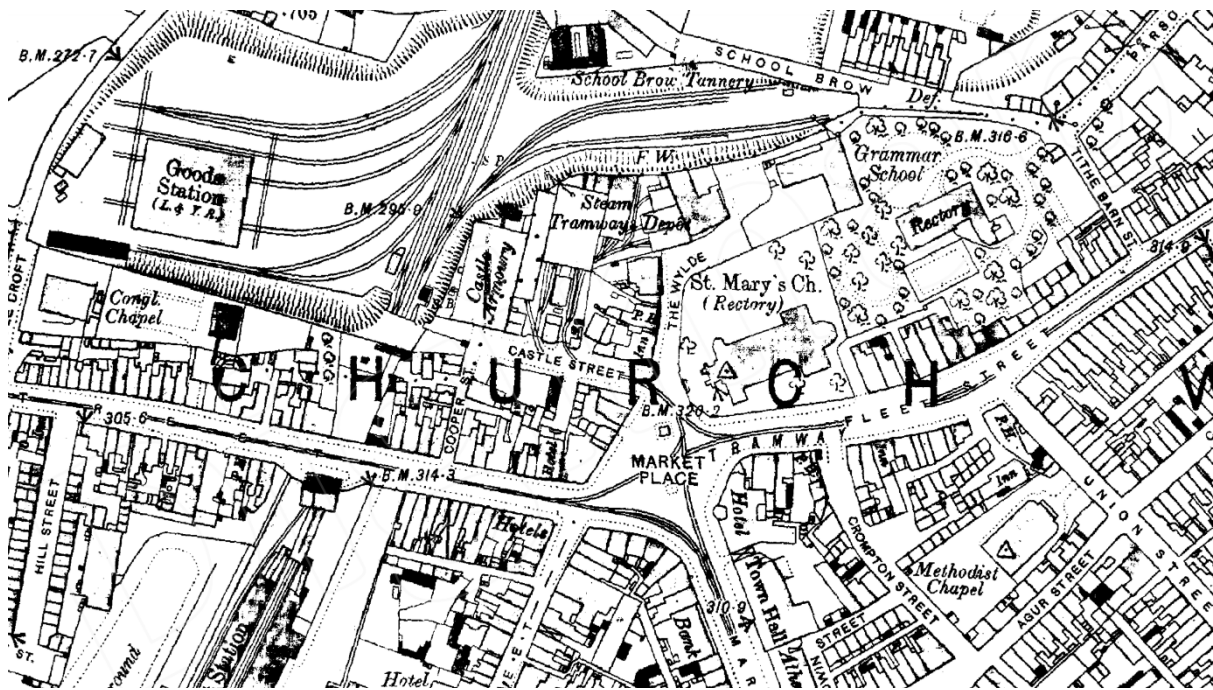


Figure 5. 1893 Ordnance Survey 1st edition. The building broadly as it stands today along Castle Street which leads to the armoury.

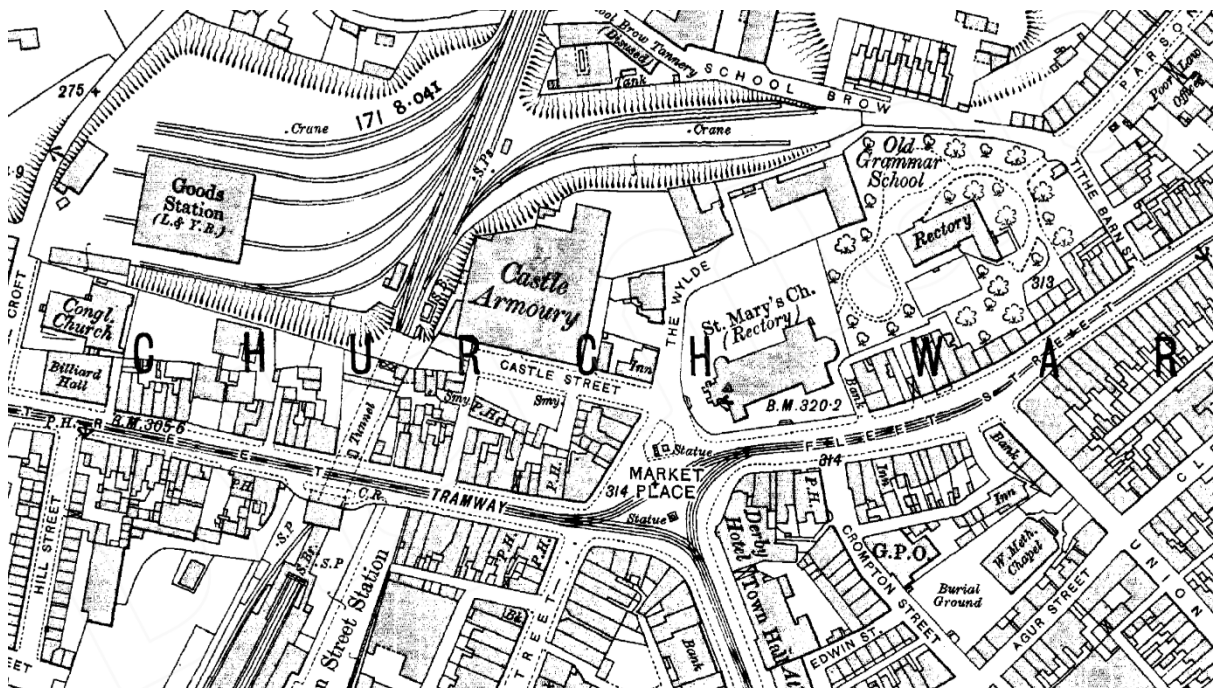


Figure 6. 1910 Ordnance Survey 1st edition. The now covered courtyard which separated the inn from ancillary buildings to the rear, possibly stables which now form part of the pub.

5.0 HISTORIC ENVIRONMENT RECORD

- 5.1 A review of the Bury and Greater Manchester Historic Environment Record has been carried out to the site and surrounding area in order to identify heritage assets which have the potential to be affected by proposals on the site.

5.2 LISTED BUILDINGS (Designated Heritage Assets)

1. **The Two Tubs Inn, 9 The Wylde.**

Grade: II

List Entry No: 1067224

Date Listed: 29th January 1985

Description:

Of doubtful age, having C19 render on C18 brick cladding to partial or complete timber frame, perhaps, C17, perhaps earlier. Two storeys. Three sash windows (lower left-hand a double width pair). Doorway framed by early C19 canopy on slender Ionic columns to right of paired window, backing on chimney. Boarded door at right end has vestigial Tudor lead. Two small sliding sash windows in left gable. Metal water spout dated "IBM 1747". Stone slab roof. Tall stacks including gable ones.

2. **Parish Church of St Mary. Market Place**

Grade: I

List Entry No: 1067236

Date Listed: 10th November 1951 amended 13th July 2006

Description:

Church. Of medieval origin, but entirely rebuilt in the C19 with tower and spire of 1844-5 by E H Shellard, and the rest by J S Crowther, of 1871-6. Dressed stone with slate roofs. Apsidal chapel with vestry and organ chamber to north, and Lady Chapel to south; 4-bay nave and aisles; narthex, with pitched roof at right angles to that of nave, the south end of which forms the main entrance porch to the church; almost freestanding tower to west of narthex. The heavily buttressed 3-stage tower is surmounted by a broach spire with lucarnes. The heads of the 2-light windows in the apse, clerestory and aisles all have Geometrical tracery, and there are small rose windows with similar tracery in the gables at the west end of the nave and both ends of the narthex.

INTERIOR. Very lofty proportions. Exposed brick with stone dressings. Fine hammer and tie-beam roof carried by arcade with clustered columns. The chancel floor and aisles in the nave are adorned with brightly coloured mosaic, the sanctuary contains a late C19 painted and gilded reredos, and the apse is enriched with painted panels (1888). There is also much fine woodwork including the choir stalls, many intricately carved with small figures, complete set of benches, and tall architectural cover to stone font. The stained glass in the apse and in the Lady Chapel is by Hardman, while the cycle of windows in the nave is by Clayton and Bell. The tower contains a group of C19 wall plaques including an amusing one with a walrus and elephant commemorating Lieutenants Robert and George Hood (d 1821 and 1823).

This, the principal church of Bury, is a very fine example of Crowther's work, displaying his great skill in the design of timberwork and enthusiasm for mosaic floors, and it also has a wealth of other high quality fittings.

3. Castle Armoury. Castle Street

Grade: II

List Entry No: 1067290

Date Listed: 29th January 1985

Description:

Built 1868 to house 8th Lancashire Rifle Volunteers, on site of Bury Castle and re- using some building materials. Extended to provide drill hall in 1907 in same loosely medieval style. Snecked rock-faced rubble. Mainly 2 storeys. Long frontage of some 30 round-headed windows, in pairs and threes. Rising above battlemented parapet are 2 towers (left-hand one flanked by taller rectangular turret, right-hand one with round-headed entry having portcullis feature which bears battalion insignia and supporters; further small turrets, at corners and other points. Arrow slits; first- floor sill-band; Corbel table. The later and much larger building attached to the rear is not included.

4. Medieval moated site and later fortified manor house known as Bury Castle 100m west of the parish church

Schedule Monument

List Entry No: 1015128

Date Listed: 27th January 1976 amended 2nd January 1997

Description:

The monument includes the buried remains of a medieval moated manor house which was fortified after a licence was granted by Edward IV in 1469. It became known as Bury Castle. The castle belonged to the Pilkington family between 1350 to 1489. It passed to the Stanley family by forfeiture to the Crown and from that date the buildings were allowed to fall into decay. The remains were finally destroyed during the Civil War after Royalists, having taken shelter in the ruins, surrendered following the Battle of Ribblesdale. The original platform for the moated manor house measured 47m by 41m with a moat 6m wide and 1.5m deep. The platform was constructed of clay and gravel supported by large pebbles. On this the original house was built in stone with walls 2m thick. This measured 25m by 20m. This building forms the bulk of the later fortified dwelling. At the time of fortification the moat was cleaned and widened and the platform reduced by 6m on average on the southern side. The vertical inside slope was revetted in stone providing a foundation for a buttressed curtain wall around the platform and a small tower on the south side. On the east side a bridge was constructed in stone. Subsequent developments on the site included the dismantling of the available stonework for other buildings and the erection of stock fences and digging of rubbish pits on the platform. The moat became filled with refuse. Parts of the site were excavated between 1972 and 1977 and revealed the sequences of occupation on the site and showed that substantial parts of the buttressed curtain wall survive in foundations on the site where later buildings with cellars have not destroyed the

remains. All road surfaces are excluded from the scheduling, although the ground beneath them is included.

5.3 CONSERVATION AREAS (Designated Heritage Assets)

5.3.1 The building lies within The Wylde, the Marketplace and Castle Street character area of the Bury Conservation Area which was designated in 1978 and extended in 2005.

5.3.2 The Wylde, the Marketplace and Castle Street character area is acknowledged as the historic core of the town containing some of its oldest buildings. As well as listed buildings, the conservation area appraisal identifies a dense cluster of buildings which contribute to its distinctive character and appearance. The Two Tubs Public House is clearly a significant contributor.

5.4 NON-DESIGNATED HERITAGE ASSETS

5.4.1 The NPPF defines non-designated heritage assets as being locally-identified '*buildings, monuments, sites, places, areas or landscapes identified by planning bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets*'. It is important to note that some non-designated heritage assets are equivalent to designated heritage assets in terms of significance.

Non-designated heritage assets can be identified in a number of ways, including:

- Local heritage lists
- Local and Neighbourhood Plans
- Conservation area appraisals and reviews
- Decision-making on planning applications

5.4.2 Bury Council have consulted on a draft list of local heritage assets which will eventually be included within the Greater Manchester Local Heritage. The following buildings within close proximity to the Two Tubs PH are included on the list:

No's 2 to 8 The Rock, Bury, BL9 0NT

No's 3 to 17 The Rock, Bury, BL9 0JP

No 40 The Rock, Bury, BL9 0NX

No's 5 and 7 The Wylde, Bury, BL9 0LA

Castle Buildings, No's 4 to 8 Market Place, Bury, BL9 0LT

Indoor Market Building, Bury Market, Bury, BL9 0BD

Nat West Bank, 36 The Rock, Bury, BL9 0NU

5.5 OTHER HERITAGE ASSETS

5.5.1 The review of the historic environment database has confirmed that there are none of the following heritage assets within close proximity to the building:

- Registered battlefields
- Registered parks and gardens

- Areas of archaeological interest

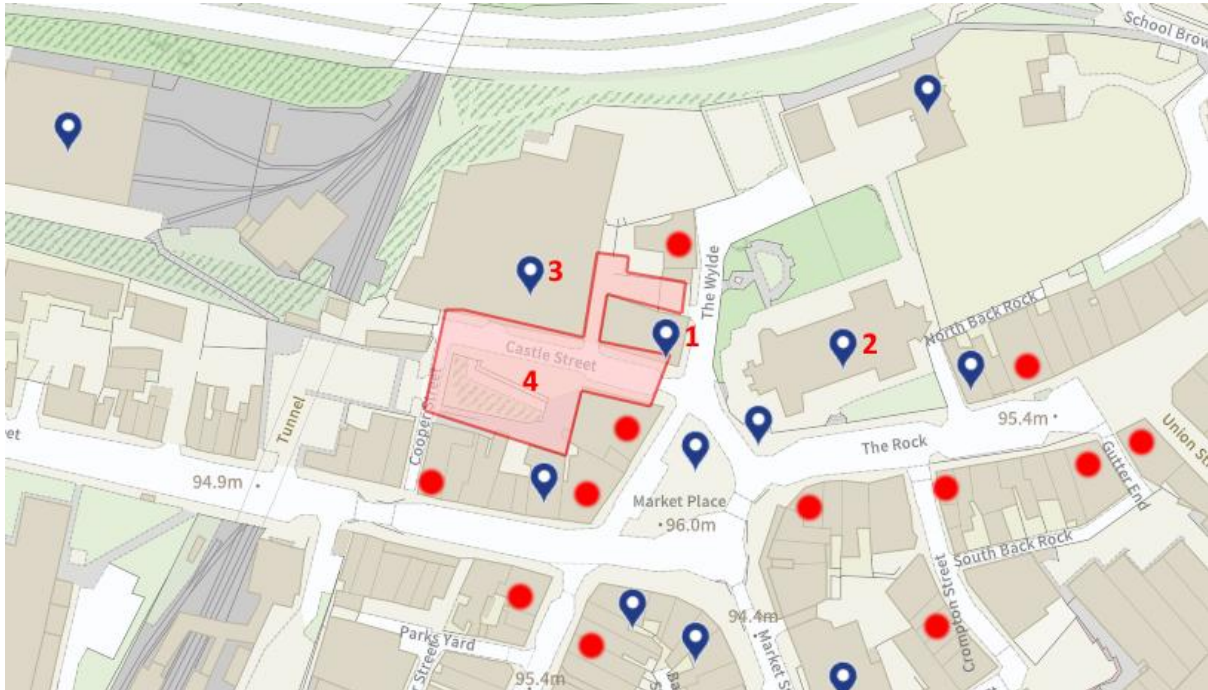


Figure 7. Historic England map indicating the location of local heritage assets. Listed buildings are numbered and listed below. Buildings which are either included on the Bury Local List or identified within the conservation area appraisal as being of merit are indicated with a red dot.

1. The Two Tubs Public House. Grade II Listed Building (the building)
2. Parish Church of St Mary. Grade I Listed Building
3. Castle Armoury. Grade II Listed Building
4. Medieval moated site and later fortified manor house known as Bury Castle 100m west of the parish church



Figure 8. Conservation area boundary map with the Two Tubs Public House identified with a red dot.

6.0 STATEMENT OF SIGNIFICANCE

- 6.1 The Two Tubs Public House clearly holds significant historic interest by virtue of its age, rarity and acknowledged origins, and whilst much of the current building's history is not thoroughly understood, significant alterations, particularly internally would have the potential to reveal elements of archaeological (evidential) interest, but conversely, if not carried out with care and consideration, great harm could arise from uninformed and invasive works.
- 6.2 The building lies at the heart of a character area within a conservation area and contributes to the distinctive character and appearance of the area. Proposals must seek to at least preserve the area's character and appearance which includes preserving its setting, the setting of the building and neighbouring heritage assets and also preserving the important characteristics of key views identified within the area.
- 6.3 Finally, the building lies within close proximity to a number of designated and non-designated heritage assets which include a Grade I Listed Building and a Scheduled Monument. Again, any development proposals must not be causative of harm to both the architectural interest and the setting of these assets.

7.0 PROPOSAL

7.1 OVERVIEW

- 7.1.1 The proposals broadly comprise the installation of a new secondary means of escape from the first floor of the building. The works include the following:
- Removal of an existing window, demolition of the masonry below the window in order to form a new doorway leading from an existing corridor to an external area on the existing modern flat roof.
 - Formation of a designated walkway along the existing flat roof, leading to the edge of the building.
 - Formation of a fabricated escape ladder with a cage and landing platform. The ladder will drop down to ground level in the event of an emergency.

7.2 JUSTIFICATION

- 7.2.1 Currently, the first floor accommodates a three-bedroom domestic apartment together with an office ancillary to the pub. There is a single internal staircase which currently has no direct safe exit to fresh air as the bottom of the stair terminates with a door leading to the public house interior. The current situation is therefore not compliant with current building regulations and in any event clearly not safe.
- 7.2.2 A safe secondary means of escape is clearly essential for the occupation of the first floor accommodation to continue.

7.3 OPTIONS

- 7.3.1 Option 1: provide a protected means of escape at the base of the existing stair. This would result in no external alterations but would require the formation of fire resistant partition walls to the base of the stair enclosing a lobby to the existing side door. This would essentially isolate two of the public lounges from the bar area and potentially compromise historic plan form and require some invasive intervention in order to install additional lighting. Given the unknown nature of the historic building fabric, this could prove over complicated if a more suitable solution is available.
- 7.3.2 Option 2: provide a secondary means of escape internally from the first floor landing to an external door. This again would result in no external alterations but would undoubtedly result in significant internal intervention with more strip-out and demolition works than option 1.
- 7.3.3 Option 3: provide a secondary means of escape externally. The existing modern flat roof arrangement with a window leading off the existing landing provides an opportunity to form a protected doorway to fresh air whereby a designated walkway leads to an escape ladder off the flat roof. This would result in external alterations which have the potential to impact on the architectural interest and the setting of the building, the neighbouring heritage assets and the character and appearance of the conservation area.

8.0 IMAGES AND OBSERVATIONS



Image 1

Image taken from the flat roof towards the rear of the historic section of the building. The window central to the image would be removed and formed in to a new doorway

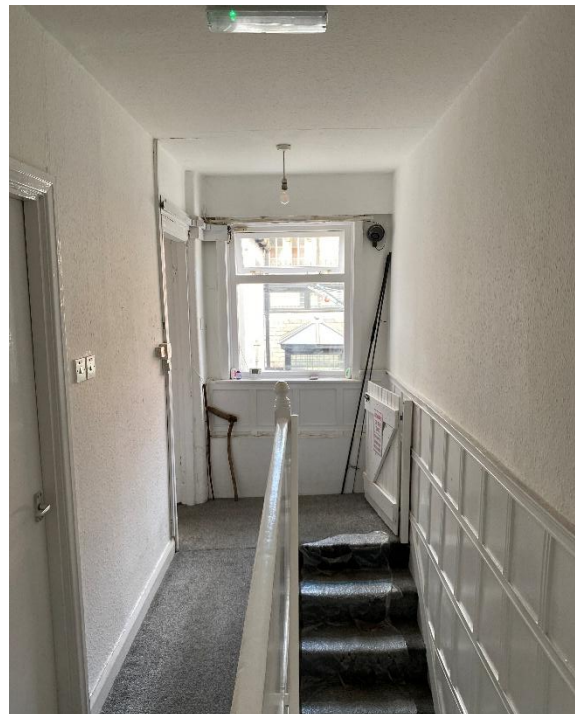


Image 2

Internal image of the window from the landing. Note the timber panelling below the dado / cill which would be removed as a result of the proposal.



Image 3

View through the site towards the rear of the building. The proposed ladder will be visible from this view with the Grade II Listed Armoury in the background.



Image 4

View from the rear yard towards the building. The proposed ladder will be visible from this view with the Grade I Listed Church in the background.

9.0 IMPACT

- 9.1 On balance, option 3 is considered to be the least invasive option with the only harmful intervention to the building being the potential loss of historic building fabric as a consequence of the opening of the window to form a doorway. The window is entirely modern but there is some wall panelling below the cill which appears 'non-modern' i.e. not resulting from a recent pub-refurb' and could hold some historic layered interest. The harm would be very minor but would be necessary in pursuit of achieving the objectives of the proposals.
- 9.2 Where proposals are causative of less than substantial harm, both national and local policy is clear in that such harm should be decisively outweighed by an over riding public benefit. Aside from the clear safety need, without the proposal, the viability of the building, primarily the use of the upper floor is significantly compromised and therefore places an element of risk on the viability of the heritage asset as a whole. Public benefit would therefore arise from the resulting long-term security given to the viability of a designated heritage asset.
- 9.3 In terms of impact on the building's architectural interest, the proposals are restricted to the modern flat roof sections of the and result in no external physical changes to areas which would be deemed to contribute to the building's significance. Similarly, there would be no perceivable impact on the building's setting (as defined in the NPPF).
- 9.4 The building is a significant contributor to the distinctive character and appearance of the conservation area and is thought to be one of the more historic buildings within the Marketplace. The conservation area appraisal identifies a number of key views which demonstrate and define

the prevailing character of the area from within the public realm. These views are important and worthy of protection from harmful intervention which could include utilitarian features such as metal escape stairs. However, in this instance, the location of the escape and the limitation of it to a ladder rather than a stair mitigates the impact considerably to the effect that there is clearly no perceivable impact on the conservation area, its setting or any of the key views identified within the appraisal.

- 9.5 Images 3 and 4 (above) indicate views of the building where the proposed escape ladder will appear with both neighbouring listed buildings in the background. Clearly there are no issues in terms of subservience and setting.

10.0 CONCLUSION

- 10.1 This document has set out to research and understand the history of the heritage assets and their context; it has evaluated significance and assessed the proposals in terms of available options and eventual impact.
- 10.2 This document has established within reason the most suitable option available to the building owner and applicant, and contends that the option is the most preferable in terms of conservation (management of change) resulting in very low level minor (less than substantial) harm which is mitigated and has demonstrable public benefits.
- 10.3 This document has applied the tests as set out in both national and local planning policy and determined that the proposals are consistent, and comply with the objectives of those policies.
- 10.4 This document therefore contends that there are no conservation-based reasons why the proposals should not be permitted subject to conditions where necessary in accordance with paragraph 58 of the NPPF ensuring that they are:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.

SOURCES

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