BRASSEY STREET
LIVERPOOL

HERITAGE IMPACT ASSESSMENT

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1 INTRODUCTION

1.1 This report relates to a planning application for development of a site at Brassey Street, Liverpool. The site is located to the south of St James's Place and the Baltic Triangle, within a dense grid of former industrial premises which are soon to be developed for mixed use residential schemes. To the east is a 3 acre area of parkland, and the land to the south was developed for low rise housing in the late 20th century.

1.2 The site is within the vicinity of two important historic buildings: St James's Church, which is listed Grade II* and Cain's Brewery, which is listed Grade II. The Anglican Cathedral is also nearby. The site is just outside the Buffer Zone of the Liverpool World Heritage Site. Due to the proposed height of the scheme, the City Council has requested the submission of an independent heritage statement assessing the potential impact of the proposal on the significance and setting of heritage assets and the Outstanding Universal Value of the World Heritage Site. This report assesses the significance of any heritage assets and their setting that may be affected, providing information so that the likely impact of the proposals can be assessed.

1.3 The impact assessment takes account of national and local planning policies and guidance, including the Liverpool World Heritage Site SPD, which contains detailed policies relating to development within the WHS and the Buffer Zone. The methodology used in this document has been developed by ICOMOS specifically for use in World Heritage Sites, and also considers the degree of compliance with the policies and guidance set out in the SPD.

2 UNDERSTANDING THE SITE

2.1 During the 18th century, the Toxteth area was part of the Earl of Sefton's estate. The earliest map record, dated 1769, may have been prepared for the Earl in connection with enclosures that took place a few years previously. The site is close to what was the northern boundary of the Sefton estate, which is marked by the present Parliament Street. The next map, dated 1796, indicates that some land reclamation had taken place, with the edge of a quay visible to the south of Queen's Dock. By 1801 a gridded street pattern had been laid out across the area forming the basis of the present street layout.

2.2 The grid was laid out by Cuthbert Bisbrown, a local builder, working in partnership with the Earl of Sefton. The latter hoped to build a new town, to be named optimistically New Liverpool. However, the scheme was unsuccessful, and Bisbrown was declared bankrupt in 1776. Although the main streets were wide, the interior of the blocks were totally unplanned, and filled in with a tangle of small alleyways and cramped courts.

2.3 In the early 19th century, reclamation and dock expansion took place at an increasing rate, with substantial developments shown as completed by the time of Horwood's map of 1803. Gore's Directory for 1821 records that the premises on Stanhope Street were mostly occupied by tradespeople employed locally, with the streets behind being residential. An article in the *Daily Post* of 1883 described the housing conditions in this area as having been 'for twenty years… the most unhealthy part of the larger squalid district stretching around it'. Throughout the third quarter of the 19th century, there was little change, with the buildings along Sefton Street in use as warehouses, and a mix of uses along Parliament Street. On Stanhope Street and Hill Street there were small traders, a timber yard, lodgings and dwellings. Brassey Street consisted of courtyard dwellings, which were the most unsanitary form of dwellings in Liverpool at the time.

OS map 1848

OS map 1890

2.6 By 1890 the timber yard on Hill Street had been replaced by a hospital, and the railway had been cut through the area with a section of open cutting between Brassey Street and Hill Street.

OS map 1924

2.7 Limited changes were made during the first quarter of the 20th century, but the later OS maps show the gradual replacement of houses with warehouses and industrial premises, possibly following wartime bomb damage. Slum clearance in the 1960s and '70s led to the demolition of most remaining dwellings, which was followed by development of the area to the south of Hill Street with a suburban layout of two storey houses. At that time the junction between Hill Street and Beaufort Street was closed and disconnected, with the northern section of Beaufort Street becoming Brassey Street. The land to east, bounded by Hill Street, Gore Street, St James's Place and Stanhope Street has been landscaped as a small urban park.

2.8 In recent years the area north of Hill Street has become very neglected, with vacant industrial premises and derelict sites, including the proposed development site on Brassey Street. Although employment uses remain, the area is now being planned for mixed developments, including the ambitious proposals for the former Cains Brewery, the Sefton Quarter, which is largely complete, the St James's Church development and Grafton Street.

3 SITE DESCRIPTION

3.1 The proposed development site is bounded by Hill Street, Brassey Street, Upper Harrington Street and the adjoining park. The railway cutting passes alongside the site at its junction with the park. The site is derelict, with no existing buildings remaining. Planning permission has been granted for an 8-storey development at Grafton Street on the west side of Brassey Street.

3.2 The railway cutting is enclosed by a stone wall, but there are no other features of interest within the immediate area.

4 HERITAGE ASSETS

Historic Environment Record (HER)

4.1 The HER includes 30 sites within a radius of 500m of the site boundary, as set out below.

NMR No.	NGR	Period	Name/Description	Status
SJ38 NE232	SJ350-888	19th century	Royal Southern Hospital	
SJ38 NE246	SJ34818921	19th century	61-65 Norfolk St, warehouses	
SJ38 NW1	SJ34968902	Undated	Approx. findspot of stone hammer	
SJ38 NW258	SJ34918879	19th century	The Grapes PH	Grade II
SJ38 NW267	SJ 34828920	19th century	60-62 Brick St, warehouse	
SJ38 NW272	SJ34798929	20th century	35 Bridgewater St, warehouse	
SJ38 NW275	SJ34768926	20th century	43 Bridgewater St, warehouse	
SJ38 NW279	SJ34658928	19th century	28 Kitchen St, warehouse	
SJ38 NW281	SJ34898928	19th century	60 Norfolk St, originally part of oil mill, now warehouse	
SJ38 NW283	SJ34808880	20th century	25-33 Sefton St, warehouse	
SJ38 NW284	SJ34838869	19th century	41 Sefton St warehouse	
SJ38 NW305	SJ345-892	1830-1959	Site of Wapping Dock Station	
SJ38 NW306	SJ348-886	1893-1956	Site of Brunswick Dock Station	
SJ38 NW332	SJ34818903	19th century	Site of Southern Hospital, Greenland St	
3488-01	SJ34778890	19th century	Poorhouses on Chaloner St	
3488-02	SJ 34958882	19th century	Site of timber yard at Caryl St	
3488-03	SJ 34988864	19th century	St Thomas's National School	
3488-04	SJ34908856	19th century	Site of timber yards at Sefton St	
3488-08	SJ3448882	1901	Warehouse on south side of Queens Branch Dock No 1	
3488-09	SJ34648883	19th century	Swing bridge between Queens Dock and Coburg Dock	
3488-10	SJ34568873	19th century	Coburg Dock	
3488-11	SJ34588880	19th century	Transit shed at Coburg Dock, partly demolished	
3488-12	SJ34668868	19th century	Swing bridge between Queens Dock and Coburg Dock	
3488-23	SJ34758861	20th century	Site of granary at Brunswick Dock, demolished 1988	
3489-61	SJ34458901	18th-20th century	Queens Dock	
3588-18	SJ35478882	19th century	St Patrick's Chapel	Grade II*
3588-19	SJ35078851	19th century	St Thomas's Church	
3589-07	SJ35278904	1775	St James's Church	Grade II*
3589-17	SJ35198936	Post medieval	Site of house and garden on n-e side of Great George St	

Statutory Designations

4.2 There are no scheduled monuments within the search area.

4.3 Within the vicinity there is one Grade I listed building, the Anglican Cathedral, two Grade II* listed buildings, St James's Church, St James's Street, and St Patrick's Chapel, Park Place. The Grade II listed buildings include the Cain's Brewery complex, together with the Grapes PH, Stanhope Street and stable building; the warehouse on the north side of Parliament Street; and 3-4 Great George Place. Two other Grade II listed buildings, the hydraulic tower at the south end of Wapping Warehouse and the gatekeeper's lodge at the entrance to Wapping Dock are outside the search area, being 800m from the site, but are within the World Heritage Site.

4.4 None of the listed buildings is immediately adjacent to the site, the closest being Cains Brewery, the Grapes PH and the stable building.

4.5 The site is not located within a conservation area, and is just outside the boundary of the Buffer Zone of the World Heritage Site.

Non-Statutory Sites

4.6 Apart from the listed buildings, 28 non-designated entries are recorded on the HER. With the exception of a stone hammer, which is probably pre-historic and is poorly provenanced, all the entries are of post-medieval date and relate to existing or former buildings. These include structures and timber yards associated with the docks, as well as places of worship, houses, a school and a hospital. The site itself is considered to be of low archaeological sensitivity.

4.7 In preparation for the impact assessment, all the sites within the search area were visited in order to determine their relative significance, and whether they might potentially be impacted on by the proposed development. The relevant sites and heritage entities are listed in paragraph 5.2 below, and are included in the impact assessment. The other non-designated sites either of low significance or would not be impacted.

5. STATEMENT OF SIGNIFICANCE

Identification of Cultural Significance

5.1 In 2008 English Heritage published '*Conservation Principles*', which identified four principle heritage values to be taken into account when assessing significance. These values are *Evidential*, deriving from the potential of a place to yield evidence about past activity; *Historical*, deriving from the ways in which people, events and aspects of past life can be connected through a place to the present; *Aesthetic*, deriving from the ways in which people draw sensory and intellectual stimulation from a place; and *Communal*, deriving from the meaning of a place for the people who relate to it in their collective experience and memory. The following assessment adopts these values.

5.2 For the purposes of the impact assessment, the statement of significance considers five relevant sites or heritage entities:

- Application site
- Cains Brewery, Grapes PH and stables
- St James's Church
- St Patrick's Chapel
- 3-4 Great George Square
- World Heritage Site Buffer Zone

The significance and the setting of the Anglican Cathedral, other buildings and townscape features is considered in the impact assessment, where a number of key views across the WHS and Buffer Zone are also analysed.

Application Site

Evidential Value

5.3 Map regression and documentary research provides evidence of residential and later industrial premises on the site, of which nothing remains. Before the late 18th century, the site was in agricultural use. Its development was part of the expansion of the docks south along the river and accompanied the rapid growth in trade that took place in the 18th and 19th centuries. During the later 20th century the area declined, and the present development scheme is one of several 21st century investments planned for the area.

Historic and Architectural Value

5.4 The site is of limited historic or architectural value.

Aesthetic Value

5.5 The site, which is vacant, awaits redevelopment. It has no significant aesthetic value, although its location alongside the existing park offers opportunities for the enhancement of the wider area.

Communal Value

5.6 The site has no communal value.

Cains Brewery

Evidential Value

5.7 The brewery dates from 1887-1902. The rear part of 1887 was designed by James Redford for the Brewery Company. The architect of the spectacular frontage block of 1902 is unknown.

Historical and Architectural Value

5.8 The building was designed to promote the status of the brewery, and is important evidence of the commercial strength of the city in the late 19th century. It is architecturally significant as an ambitious and richly decorated industrial building using red brick and terracotta for architectural display.

Aesthetic Value

5.9 The tower gives the building a significant presence in the townscape and was designed to make a statement on the lower slope of Parliament Street.

Communal Value

5.10 The brewery was built to serve the needs of the artisan and working class community of Liverpool, and is representative of the economic and social structure of Liverpool in the late 19th century.

5.11 The brewery has recently closed, but there are plans to convert and extend the complex as a mixed-use enterprise.

Grapes PH and Stables

5.12 The Grapes Public House and the Stables are part of the Cains Brewery complex. They were built at the same time. Both are smaller in scale than the brewery building itself, and are less prominent in the streetscape.

St James's Church, St James's Place

Evidential Value

5.13 The church was built in 1774-75 to serve the new community which was moving out to Toxteth. It was built and possibly designed by Cuthbert Bisbrown who laid out the plan of the area.

Historic and Architectural Value

5.14 It is a typical Georgian church of red brick with stone dressings and a castellated west tower with pairs of round arched belfry openings. There are two tiers of windows, the upper row lighting the gallery which is supported on slender cast-iron columns, a very early structural use of the material.

Aesthetic Value

5.15 The church occupies a prominent site overlooking St James's Place from higher ground within a large churchyard, which is surrounded by trees. The tower is a landmark at the wide traffic junction.

Communal Value

5.16 The church is the earliest surviving building within the area, and has a distinguished history of worship. It was closed in the late 20th century and adopted by the Churches Conservation Trust. In recent years it has been restored and re-opened on an occasional basis.

St Patrick's Chapel, Park Place

Evidential Value

5.17 This large church dates from 1821-27 and was designed by John Slater. Prominent on the front elevation is a statue of St Patrick, which came from the St Patrick's Insurance Co. Building in Dublin.

Historic and Architectural Value

5.18 The building is on an unusual cruciform plan with short 2-storey transepts containing staircase leading up to galleries. It resembles a Non-conformist chapel with two tiers of round headed windows and a pedimented gable. Four Greek Doric columns form a porch in front of each entrance.

Aesthetic Value

5.19 The building stands above the road in a small churchyard, which is surrounded by a stone wall. It has a commanding presence with its broad front gable, projecting transepts and louvred turret.

Communal Value

5.20 The church is one of the most important for the Roman Catholic community in Liverpool and has a long history of service.

3-4 Great George Place

Evidential Value

5.21 The building was erected as a former branch of the North and South Wales Bank c.1878. The architect is unknown, but it could be by J P Seddon, who designed the bank's Birkenhead branch around the same time, and in a similar architectural style.

Historic and Architectural Value

5.22 The building now stands in splendid isolation, since all around it has been demolished. This emphasises the Building's tall, narrow proportions, and makes it a minor landmark on the approach to the city centre.

Aesthetic Value

5.23 The building is designed in the Gothic style with a mix of square and trefoil-headed windows and a central gable.

Communal Value

5.24 Since closing as a bank, the building has been in retail use. It stands on the edge of the Baltic Triangle, which is one of the fastest developing and most distinctive areas of the city.

World Heritage Site Buffer Zone

5.25 The Buffer Zone exists to protect the setting of the WHS, and any development within the Buffer Zone must respond to and reflect the characteristics of the area around it so that it would not harm the OUV of the WHS itself. Although the site is just outside the Buffer Zone, it is situated at a prominent road junction, which serves as a gateway into the city centre.

5.26 The potential impact of development on significant views is considered in the heritage impact assessment that follows.

6 HERITAGE PLANNING CONTEXT

6.1 National Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

6.1.1 Statutory protection for built heritage is principally provided by the Planning (Listed Buildings and Conservation Areas) Act 1990.

National Planning Policy Framework

6.1.2 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The Government sees three dimensions to sustainable development: economic, social and environmental, and these roles should be regarded as mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. The planning system is therefore expected to play an active role in guiding development to sustainable solutions. Policies 126-141 are related to conserving and enhancing the historic environment.

6.1.3 The NPPF describes the historic environment in terms of "*heritage assets*." It defines the significance of a heritage asset as its value '*to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic*. *Significance derives not only from a heritage asset's physical presence, but also from its setting.'*

6.1.4 Paragraphs 128 and 129 of the NPPF require planning applicants and local planning authorities to assess the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be appropriate to the assets' importance and no more than sufficient to understand the potential impact of the proposal on their significance. Local planning authorities should take this assessment into account when the potential impact of proposed development to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

6.1.5 Paragraph 131 states that local planning authorities should take account of the desirability of new development sustaining and enhancing the significance of heritage assets; the positive contribution that heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local distinctiveness.

6.1.6 Paragraph 132 sets out policy principles guiding consideration of impact of development on the significance of a designated heritage asset. The more important the asset, the greater the weight should be given to the asset's conservation. Any harm to or loss should require convincing justification.

6.1.7 Paragraph 133 provides a series of tests that should be applied in cases where substantial harm to or total loss of significance will be caused. In the case of development proposals that will lead to less than substantial harm, paragraph 134 states that this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

6.1.8 Paragraph 137 states that local authorities should look for opportunities for new development within Conservation Areas 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 or better reveal the significance of the asset should be treated favourably.

6.1.9 Paragraph 138 states that not all elements of a World Heritage Site or Conservation Area 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 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or the World Heritage Site as a whole.

6.1.10 Policy 141 states that local planning authorities should make information about the significance of the historic environment gathered as part of the development process publicly accessible, and should require developers to record and advance understanding of the heritage asset before it is lost.

6.2 Local Policy and Guidance

Liverpool Unitary Development Plan

6.2.1 Policy HD5: Development affecting the Setting of a Listed Building

Planning permission will only be granted for development affecting the setting of a listed building, which preserves the setting and important views of the building. This will include, where appropriate:

(i) control over the design and siting of new development;
(ii) control over the use of adjacent land; and
(iii) the preservation of trees and landscape features.

6.2.2 Policy HD18: General Design Requirements

When assessing proposals for new development, the City Council will require applications to comply with the following criteria, where appropriate, to ensure a high quality of design:

1 *The scale, density and massing of the proposed development relate well to its locality*
2 *The development includes characteristics of local distinctiveness in terms of design, layout and materials*
3 *The building lines and layout of the development relate to those of the locality*
4 *External boundary and surface treatment is included as part of the development and is of a design and materials which relate well to its surroundings*
5 *All plant machinery and equipment are provided within the building envelope or at roof level as an integral part of the design*
6 *The development pays special attention to the views into and out of any adjoining green space, or area of Green Belt*
7 *The development has regard to and does not detract from the city's skyline, roofscape and local views within the city*
8 *The satisfactory development or redevelopment of adjoining land is not prejudiced*
9 *There is no severe loss of amenity or privacy to adjacent residents*
10 *In the case of temporary buildings, the development is of a suitable design and not in a prominent location*
11 *Adequate arrangements are made for the storage of refuse within the curtilage of the site and the provision of litter bins where appropriate*
12 *The exterior of the development incorporates materials to discourage graffiti*
13 *Adequate arrangements are made for pedestrian and vehicular access and for car parking*

6.2.3 Policy HD8: Preservation and Enhancement of Conservation Areas

The City Council will take positive action to secure the preservation or enhancement of conservation areas and will:

(i) seek support and funding from all available sources for the repair of buildings and environmental improvements;
(ii) prepare action plans for priority areas;
(iii) use its available powers to secure the removal of features which significantly detract from the character of the area; and
(iv) provide planning guidance and advice to owners and developers.

6.2.4 Policy HD12: New Development adjacent to Conservation Areas

Development on land adjacent to a conservation area will only be permitted if it protects the setting of the conservation area and important views into and out of it.

6.2.5 Policy HD17: Protection of Archaeological Remains

1. The Council will seek to protect other sites of archaeological importance. Where development is proposed in areas of known or suspected archaeological importance the City Council will require that:
(i) developers have the archaeological implications of their proposals assessed by a recognised archaeological body at an early stage and the results submitted as part of the planning application;
(ii) important archaeological remains and their settings are permanently preserved in situ;
(iii) where in situ preservation is not justified and disturbance by development is acceptable in principle, the applicants undertake an agreed programme of mitigation including investigation, excavation and recording before development begins, or as specified in the agreed programme; and
(iv) conflicts regarding archaeological issues and development pressures are resolved by means of management agreements.

2. The City Council will continue to support the Merseyside Sites and Monuments Record held by the National Museums and Galleries on Merseyside, to ensure that archaeological evidence, both above and below ground is properly identified, recorded and protected.

Liverpool World Heritage Site Supplementary Planning Document (2009)

6.2.6 The SPD has been produced to provide detailed guidance for new development, regeneration and conservation in the WHS and its Buffer Zone. It is intended to supplement the existing "saved" UDP policies, and will deal with the management of the site, acting as a guide to future development in and around the site and embodying the principles in the existing WHS Management Plan.

6.2.7 In addition to policies and guidance relating to the WHS as a whole, the document includes a section on the WHS and Buffer Zone.

6.2.8 Paragraph 3.2 on page 35 of the SPD relates specifically to the Buffer Zone. It states that: *'…there are still many sites in within the Buffer Zone where there are opportunities for new development and the sustainable re-use of historic buildings. The principle of new development and the conservation of significant historic buildings in the Buffer Zone is positively encouraged in order to repair the fractured urban landscape and to contribute to the social and economic life of the city.'*

6.2.9 Section 4.4 of the SPD relates to views to, from and within the WHS. These views are an important aspect of its visual character and directly contribute to its OUV. They also form part of the character and setting of the conservation areas that encompass the WHS and some of the views form part of the setting of key listed buildings within the WHS and the Buffer Zone.

6.2.10 The SPD identifies the main types of views throughout the city, under the following categories:

- ***Key Visual Landmark buildings within the WHS and Buffer Zone***. These provide visual reference points across the cityscape, and form major components of key views to, from and within the WHS. The landmark buildings include the Pier Head complex, the Albert Dock complex, the Anglican Cathedral and the Wapping Warehouse, which are relevant to the application site.
- ***Distant Views to the WHS***. These views provide broad-ranging panoramas of the city centre, including the WHS, and defined lines of sight to key landmark buildings within and around the WHS.These views place the key landmarks in their wider urban context and support the identification of areas where new development could either obscure a view to a landmark or affect its visual prominence by altering its foreground, backdrop or the edge of the view. Two broad types of urban view are identified: river prospects from the other side of the Mersey, and panoramas providing long distance views over the city centre.
- ***Views to the WHS from the River Mersey***. Typically seen from ferries, pleasure craft and cruise ships.
- ***Key Local Views***. These views are numerous and are important as they aid the legibility and understanding of the city. They are also significant to the OUV of the WHS, the character of conservation areas and the wider city centre. The key local views are divided into three groups: defined vistas, typically along streets or thorughfares; general views/panoramas, often enabling the viewer to place a number of landmarks within the wider urban context; and general views with a focal point that will have at least one landmark buiding as its focus.
- ***Views of the River***. In addition to views from the river towards the WHS, the visual connections between the WHS and the river are also important. These views can typically be from dockland areas looking out to the river, or from higher ground.

6.2.11 The guidance in the SPD states that tall buildings in particular have the potential to alter the visual character of the WHS. It is therefore important to ensure that new development respects the network of views to, from and within the WHS, and avoids wholly obstructing a key public view of a landmark building or overly dominating a panorama.

6.2.12 Section 4.5 of the SPD deals with riverside development. The policy in paragraph 4.5.2 states that it is important to deliver riverside development within the Buffer Zone that respects the WHS's OUV and the following particular features:

- The importance of views of the Pier Head buildings as a focal point for Liverpool's and the WHS's river frontage
- The varied skyline of the city centre in particular the views to the cathedrals, other landmark buildings and the ridge of higher ground to the east of the city centre
- The careful juxtaposition of buildings of different periods along the waterfront, which demonstrates the evolution of the waterfront and can create an exciting visual interplay.

The aim of this policy is to create a cohesive and exciting waterfront of both historic and contemporary buildings which sit harmoniously together.

6.2.13 Paragraphs 4.6.16-4.6.21 deals with high-rise buildings in the Buffer Zone. The City Council recognizes the potential benefits of high-rise and medium-rise buildings, and has therefore identified three possible locations for clusters of tall buildings in the Buffer Zone. These are an extension of the dominant tall building cluster in the existing commercial district; the site of the former Clarence Dock; and the Southern Gateway.

6.2.14 The opportunity at the Southern Gateway is for a secondary grouping of medium-rise and high-rise buildings in the area around the junction of Parliament Street and Chaloner Street. Key design considerations in this location would include:

- The need for the group to be visually and numerically subservient to the commercial district cluster.
- Achieving a sensible balance with the larger commercial cluster and the Clarence Dock cluster, being seen as distinctly smaller in terms of its number, scale and height from the former.
- Ensuring the heigh of the group does not interrupt views to and from the WHS or the visual relationship between the Anglican Cathedral, the WHS, the river and the Wirral.
- Reduce the impact of severance created by the road hierarchy.

6.2.15 A number of specific design criteria are also set out for high-rise buildings. These are intended to ensure that high-rise buildings enhance the townscape of Liverpool and do not compromise the setting of the WHS.

World Heritage Site Management Plan (2003)

6.2.16 The WHS Management Plan contains the following objectives that are relevant to the application proposal:

Objective 3.3: *Ensure that settings of historic buildings and/or building complexes are taken into account when planning change.*

Objective 4.1: *Ensure that the unique character, distinctiveness and aesthetic quality of the Site's townscape is recognized, conserved and enhanced.*

Objective 4.4: *Identify and protect key visual relationships, panoramas and vistas into, out of and across the Site.*

Objective 5.1: *Continue to ensure that all new development within the Site and its Buffer Zone are of high design and construction quality.*

Objective 5.2: *Ensure that new development respects the significance of the Site and is appropriate to the historic urban grain and the townscape context.*

Objective 5.3: *Identify inappropriate buildings within the Site and its environs and establish a long-term programme for their replacement or redevelopment.*

Objective 5.4: *Identify and release development sites within the Site and Buffer Zone in a manner that does not conflict with, and wherever possible, supports the conservation and regeneration objectives.*

Objective 12.1: *Monitor and manage change within the Buffer Zone to ensure that the setting of the Site is adequately protected from development that is incompatible with the distinctive character and status of the Site.*

7 THE DEVELOPMENT PROPOSAL

7.1 A full planning application is submitted by **Eloquent Global Ltd** that seeks permission for the erection of two buildings (15 storeys and 10 storeys) comprising a total of 246 apartments (studios, 1, 2 and 3 bedrooms) and 1,729 sqm of mixed commercial space subdivided into seven units within a combination of Class A1, A2, A3, A4, B1(a), D1 or D2, with 180 subterranean car parking spaces over two levels (beneath both Blocks A and B) accessed from Brassey Street), 50 cycle parking spaces, and landscaped amenity space, and enhancement works to the adjacent public park.

7.2 The design principles, including urban scale, the relationship with the adjoining park and future connections with surrounding areas are set out in the Design and Access Statement.

8 HERITAGE IMPACT ASSESSMENT

8.1 Assessing Impact on Significance

8.1.1 Paragraph 128 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting. Paragraph 129 requires that local planning authorities should take any assessment of significance into account when considering the impact of a proposal on a heritage asset to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

8.1.2 The methodology adopted is the ICOMOS *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*. The ICOMOS guidance document requires that the HIA report should provide the evidence on which decisions can be made in a clear, transparent and practicable way, and sets out a well-structured methodology for evaluating impact on the attributes of OUV. This is different in emphasis from the EIA process, which normally disaggregates all the possible cultural heritage attributes and assesses impact on them separately, through discrete receptors such as protected buildings, archaeological sites, and specified viewpoints with their view cones, without applying the lens of OUV to the overall ensemble of attributes. This methodology is more directly linked to the expression of the site's OUV.

8.1.3 ICOMOS states that 'the assessment process is in essence very simple:

- What is the heritage at risk and why is it important – how does it contribute to OUV?
- How will change or a development proposal impact on OUV?
- How can these effects be avoided, reduced, rehabilitated or compensated?'

8.1.4 The potential impact of development on aspects of the historic environment that convey OUV is assessed under the following six categories:

- Direct impacts on a schedule of designated heritage assets that have a relationship with the site and reflect aspects or attributes of OUV
- Impact on Key Views of and from the Liverpool Waters site identified in pre-application discussions
- Impact on Views and Setting of strategic Landmark Buildings within the WHS and Buffer Zone
- Compliance with Guidance in WHS SPD

8.2 Evaluation of Heritage Resources

8.2.1 The evaluation method used is that set out in the ICOMOS guidance. In this system, the value of heritage resources is assessed in relation to statutory designations, international, national and local, but linked clearly and objectively to the components identified in the Statement of OUV, integrity and authenticity. The values of the assets and attributes are defined using the following graded scale, in accordance with the table below:

- Very High
- High
- Medium
- Low
- Negligible
- Unknown

Level of Significance	Heritage Attributes
Very high	Sites, structures or landscapes of acknowledged international importance inscribed as WHS Assets that contribute significantly to acknowledged international research objectives Urban landscapes of recognised international importance Associations with particular innovations or developments of global significance Associations with individuals of global importance
High	Scheduled monuments and undesignated assets of such importance to be scheduled Grade I and II* listed buildings, and Grade II buildings with exceptional qualities Conservation Areas containing very important buildings Undesignated structures of clear national importance Urban landscapes of exceptional importance Associations with particular innovations or developments of national significance Associations with individuals of national importance
Medium	Designated or undesignated assets that contribute to regional research objectives Grade II listed buildings and undesignated buildings that have exceptional qualities or historical associations Conservation Areas that contain buildings that contribute significantly to its historic character Historic townscapes with important integrity in their buildings or built settings Associations with particular innovations or developments of regional or local significance Associations with individuals of regional importance
Low	Designated or undesignated assets of local importance Assets compromised by poor preservation and/or poor survival of contextual

	associations Assets of limited value, but with potential to contribute to local research objectives Locally listed buildings Assets of modest quality in their fabric or historical associations Historic townscapes with limited integrity in their buildings or built settings Associations with individuals of local importance Poor survival of physical areas in which activities occur or are associated

8.2.2 The report includes text descriptions of heritage attributes, setting out their importance, inter-relationships and sensitivity.

8.2.3 Regarding the assessment of impact on views, this report makes use of the methodology ***Seeing the History in the View***, published by Historic England in 2011. A number of defined stages are taken to ensure consistency and objectivity in the assessment process, which has been adapted to focus on identification of attributes of OUV in each of the views. As encouraged in the guidance, reliance has also been placed on the experience of the author in the field of architectural history and conservation of the built environment. This has been provided through an in-depth understanding of Liverpool's heritage and an informed knowledge of the area over many years.

8.3 <u>Assessment of Scale of Specific Impact</u>

8.3.1 The scale/severity of impacts (adverse or beneficial) are judged taking account of their direct and indirect effects, without regard to the value of the asset as follows:

- No impact
- Negligible impact
- Minor impact
- Moderate impact
- Major impact

8.3.2 The significance of the effect of change or impact on an attribute is a function of the importance of the attribute and the scale of impact, thus reflecting the weighting of significance in the assessment of impact. As impacts can be adverse or beneficial, there is a nine-point scale with 'neutral' as its centre point:

- Very large beneficial
- large beneficial
- moderate beneficial
- slight beneficial

- Neutral
- slight adverse
- moderate adverse
- large adverse
- very large adverse

8.3.3 The scale and severity of change or impact (either adverse or beneficial) is identified by considering the direct and indirect effects against the value of the heritage asset as set out in the table below:

Value of Heritage Asset	**Scale and Severity of Change/Impact**				
	No Change	**Negligible Change**	**Minor Change**	**Moderate Change**	**Major Change**
Very High	Neutral	Slight	Moderate/Large	Large/Very Large	Very Large
High	Neutral	Slight	Moderate/Slight	Moderate/Large	Large/Very Large
Medium	Neutral	Neutral/Slight	Slight	Moderate	Moderate/ Large
Low	Neutral	Neutral/Slight	Neutral/Slight	Slight	Slight/ Moderate
Negligible	Neutral	Neutral	Neutral/Slight	Neutral/Slight	Slight

8.3.4 Impacts also take into account the baseline statements on integrity and authenticity, and the relationship between attributes of OUV, integrity and authenticity.

8.4 **Scope of Assessment**

8.4.1 The assessment takes account of the existing site and its context.

8.4.2 The area covered in the assessment includes the principal streets and spaces around the site, the wider setting and more distant townscape features that have a spatial relationship with the site. This includes key views identified in the WHS SPD and those agreed with the local planning authority.

8.4.3 An analysis of the significance of the proposed development site is set out in section 5 of this report. It demonstrates that the principal feature of significance relates to its setting at the edge of historic dockland and dock-associated uses. This is relevant to views into, from and across the WHS.

8.4.4 Taking account of the status of the heritage assets considered in relation to the application site, the aspects of significance, and relevant policies of the NPPF, the impact of the proposal is considered below.

8.5 Impact Assessment

Impact on Existing Site

8.5.1 The application site is currently vacant and awaiting redevelopment. The site has been demonstrated to have low archaeological potential and its value as a heritage asset is negligible. The proposed redevelopment would provide a strong sense of place, heralding the regeneration of the area and would have a **moderate beneficial** impact.

Impact on Cains Brewery

8.5.2 Cains Brewery is a Grade II building dating from the late 19th century, which is significant for its prominence in the townscape and its strongly modelled architectural display. The roofline of the building can be seen from certain distant viewpoints, but its value is more discernable as a local landmark, seen particularly from Upper Parliament Street and Parliament Street, where it is currently the dominant building. Its value as a heritage asset is high.

8.5.3 Its proximity to Brassey Street means that the proposed development and Cains Brewery may be viewed together from a few viewpoints, such as from the park to the east and possibly from Hill Street to the south, but these are not significant viewpoints. From most locations, the approved Cains Village scheme obscures the listed building. Long views downhill from Upper Parliament Street, where the brewery is most prominent would not be affected, since the proposed development would be outside the perimeter of view. The impact on the front of the building, which is its most important aspect, would be limited, where its strong character and robust presence would continue to command attention in the streetscape.

8.5.4 The proposal set out in the WHS SPD to create a secondary cluster of mid and high-rise buildings in the Southern Gateway area presents an opportunity to enhance the skyline of the city by grouping tall buildings together. The proposal for a 25-storey tower at the junction of Sefton Street and Parliament Street has recently been approved, where it was accepted that the new tall building and Cains Brewery would become complementary landmarks that could both gain by association. Although Brassey Street is not within the secondary cluster, from certain viewpoints it would be seen in alignment with the cluster and with Cains Brewery. The impact on its setting will be **neutral.**

Impact on Brewery Stables

8.5.5 The brewery stables were designed as an integral element of the brewery complex, as was The Grapes PH. Unlike The Grapes, however, the stable block is detached from the main complex. It is much smaller in scale than the main building, and is not prominent in the street scene even when seen from close-to. The stables will not be seen in conjunction with the proposed development, and therefore the impact on its setting will be **neutral**.

Impact on St James's Church

8.5.6 The Grade II* listed St James's Church is a significant landmark at the junction of St James Place and Parliament Street. Its value as a heritage asset is high. The development site is screened by trees in the park and is not therefore currently visible from the church. At 15 storeys, however, the proposed building would be visible, except that there is a scheme in preparation for medium-rise development at St James's Place which will occupy land between the church and Brassey Street. Should this be approved and built, it would obscure the proposed building. Even discounting this possibility, the degree of separation between the church and the site is such that the potential impact would be **neutral**.

Impact on St Patrick's Chapel

8.5.7 The Grade II* listed St Patrick's Chapel is also a landmark, but it lies a similar distance from the development site as St James's Church. It is not seen in the same views, and the potential impact would be **neutral**.

Impact on 3-4 Great George Place

8.5.8 The Grade II listed building at 3-4 Great George Place is of medium significance. Its principal view is from the south, where it would not be seen in conjunction with the development proposal. The approved China Town development provides a new setting for the listed building at an increased scale. The potential impact would be **neutral.**

Impact on Views

8.5.9 The likely effects of the development on a wide range of views across the city and beyond has been assessed, based on viewpoints selected in agreement with the Council.

View 1: Queen's Wharf, overlooking Queen's Dock

8.5.10 This view looks over Queens Dock towards the Sefton Quarter, where the approved tower is intended to create a landmark at the junction of Chaloner Street, Sefton Street and Parliament Street. The Anglican Cathedral is visible at the extreme left. Just the very top of the Brassey Street scheme would be seen above the Cains Village development in the gap between the completed Sefton Quarter development and the dockside buildings, but it would appear as a background feature.

8.5.11 In this view the proposal would not compete with any of the key historic landmark features. Its potential impact on the OUV of the WHS would therefore be **neutral**.

View 2: Great George Street close to 3-4 Great George Place

8.5.12 In this view the tower of Cains Brewery is visible in an otherwise featureless panorama. The proposed development would become the focus of the view, but being more distant it would not detract from the value of the Cains Brewery tower or any other attributes of OUV. As a new townscape feature

its potential impact on the OUV of the WHS would therefore be **slight beneficial**.

View 3: Sefton Street

8.5.13 In this view the proposed development would add interest to the townscape by marking the rising ground, and combined with the approved Grafton Street development by breaking the existing skyline. The view contains no heritage assets and is of no special significance to the values of the WHS. In this view the proposal would have a **neutral** impact on the OUV of the WHS.

View 4: King's Parade overlooking Queens Branch Dock

8.5.14 From this viewpoint the majority of the Sefton Quarter development is visible, with the tower, which has been approved but not yet built forming a new landmark. The Brassey Street project is scarcely visible to the right of the Sefton Quarter where it breaks the skyline just above the approved Grafton Street development. The Anglican Cathedral remains the dominant distant landmark. Although the view looks across the Queen's Branch Dock, which is of historic interest, it does not include any part of the WHS and is not a key view for understanding the aspects of OUV. From a townscape perspective, the juxtaposition of old and new creates a dramatic contrast, which would not lead to any serious loss of significance. The impact on the OUV of the WHS in this view would be **neutral**.

View 5: Upper Parliament Street

8.5.15 From this viewpoint the Church of St James is the prominent landmark. The tower of Cins Brewery is visible beyond through the trees. The proposed development would be entirely screened by the nave of the church, with the result that there would be a **neutral** impact on the OUV of the WHS.

View 6: Great George Street

8.5.16 From this viewpoint (further north along Great George Street than viewpoint 2), the proposed scheme would still form the focal point of the view. Following development of the China Town project, the road will be flanked by development on the west side, which will more effectively frame the view. In this view there would be a **slight beneficial** impact on the OUV of the WHS.

View 7: Woodside Ferry Terminal, Birkenhead

8.5.17 In this cross-river view, the site is very distant from the viewpoint and the panorama is broad. The Pier Head and the Albert Dock are within the view plane, and the dominant landmark is the Anglican Cathedral, with recent waterfront development such as the Arena and Convention Centre and the Exhibition Centre being the other prominent features. The development would form a minor addition to the skyline, where it would form a continuation of the approved Grafton Street development and Cains Village. It would help to articulate the slope of the land, which is one of the major topographical features of the city. It would be separate from the WHS and would not challenge the dominance of the key attributes of OUV.

8.5.18 In this view, the tower would have a **neutral** impact on the OUV of the WHS.

View 8: Chaloner Street

8.5.19 From this viewpoint the approved Sefton Quarter tower is due to become the prominent new landmark and orientation point at the highway junction at the bottom of the Parliament Street. Because of the bend in the road, however, it does not harm the setting of Cain's Brewery. Only a tiny portion of the Brassey Street development would be visible from this point, set behind the approved Grafton Street development. In this view, the tower would have **neutral** impact on the OUV of the WHS.

View 9: Mill Street

8.5.20 This view from the area of low rise housing is not of heritage significance. The proposed development would be visible between the houses, but would have **neutral** impact on the OUV of the WHS.

View 10: Park Road

8.5.21 As with Viewpoint 9, the view from Park Road does not include any heritage features. Since Park Road is a major route into the city centre, this is a more important view, but the proposed development would not be dominant. In this view the proposal would have a **neutral** impact on the OUV of the WHS.

View 11: Windsor Street at Junction with Upper Warwick Street

8.5.22 From this viewpoint, the proposed development would not be visible and the impact would be **neutral.**

View 12: Windsor Street

8.5.23 From this viewpoint the east end of St Patrick's Chapel can be seen. The proposed development would be visible to the right of the view, but would not rise above the roofline of the church, and the impact would be **neutral**.

<u>Compliance with Policy and Guidance in Liverpool World Heritage Site SPD</u>

Character and Townscape

8.5.24 Paragraph 4.2.3 of the SPD states that the varied character of the urban landscape both within the WHS and buffer zone is an important aspect of the 'sense of place', and contributes to the Site's OUV. The SPD requires *that applicants for development must demonstrate that they have understood the characteristics of the site and its environs and that the design proposals have responded to the OUV of the locality in terms of materials, layout, mass, relation to street, architectural detail and height*.

8.5.25 The design and shape of the building make references to technology and to the pioneering traditions of Liverpool engineers and architects, which are a major aspect of OUV. The city was at the forefront of tall building technology in the 19th and early 20th centuries. The scale and massing of the

development complements the design of other buildings that are planned for the area, and provide greater townscape coherence.

8.5.26 These references and relationships, which will give the building a lively and distinctive character, demonstrate an informed level of understanding of the characteristics of the site and its environs to which the design proposals have responded. It would contribute to the sense of place. The degree of compliance with the guidance is considered to be **high compliance**.

Tall Buildings in the Buffer Zone and their relationship to the WHS

8.5.27 Paragraph 4.2.9 of the SPD states that where a proposal in the Buffer Zone is for a tall building, special consideration should be given to the relationship between the development and the WHS and the impact of development on the historic character of its locality and any buildings that contribute to that character.

8.5.28 The site is outside the boundary of the Buffer Zone. Therefore it stands quite separate from the historic landmark buildings such as the Pier Head group, the Albert Dock and the Wapping Warehouse. Nonetheless, it has a relationship with the WHS since it is relatively close to the riverside. For this reason the application proposal has been designed to act as a landmark, complementing other landmarks along the waterfront in height, scale and appearance.

8.5.29 The degree of compliance with the guidance is considered to be **high compliance**.

Architectural Excellence

8.5.30 Paragraph 4.2.12 of the SPD states that the architectural quality of a proposal within the WHS and Buffer Zone must be of the highest quality of contemporary design, but respect, respond to and enhance its highly sensitive and important historic context.

8.5.31 The design is of an appropriate architectural quality, and the degree of compliance with the guidance is considered to be **high compliance**.

Views to, from, and within the WHS

8.5.32 Section 4.4 of the SPD refers to the potential impact that development may have on key views. The impact of the development has been assessed in the paragraphs above, where it has been shown that degree of compliance with the guidance is considered to be **high compliance**.

Riverside Development

8.5.33 Section 4.5 of the SPD states that the relationship between the River Mersey and the WHS is a fundamental aspect of its OUV. Riverside development within the Buffer Zone must therefore respect the WHS's OUV and the following features:

- the importance of views of the Pier Head buildings as the focal point for the waterfront
- the varied skyline of the city centre in particular views to the cathedrals, other landmark buildings and the ridge of higher ground to the east of the city centre
- the careful juxtaposition of buildings of different periods along the waterfront, which demonstrates the evolution of the waterfront and can create an exciting visual interplay.

It is stated that the aim is to create a cohesive and exciting waterfront of both historic and contemporary buildings, which sit harmoniously together.

8.5.34 The issues around views and potential impacts historic landmark buildings have been considered in the previous paragraphs, but the SPD policy relating to a continued evolution of the waterfront skyline is relevant to the application proposal. For the reasons previously set out, this site is an appropriate location for a new landmark. Its separation from the Pier Head, the Anglican Cathedral and other landmarks also makes it suitable. The height, scale, massing and materials have been carefully considered to ensure that it will add to the cohesiveness of the waterfront. The degree of compliance with the guidance is therefore considered to be **high compliance**.

High-rise buildings in the Buffer Zone

8.5.35 Paragraphs 4.6.15 – 4.6.19 deal with high-rise buildings in the Buffer Zone. The Council recognises the potential benefits of high-rise and medium-rise buildings and the need to enable their development in the city centre to support Liverpool's economic regeneration. The SPD indicates three potential locations – a dominant cluster as an extension of the existing Commercial District, and two secondary clusters, one on and around the site of the former Clarence Dock within the Liverpool Waters site, and the other at the Southern Gateway in the area around the junction of Parliament Street and Chaloner Street.

8.5.36 Paragraph 4,6,17 sets out four specific design considerations relating to the Southern Gateway cluster:

- the need for this group to be visually and numerically subservient to the Commercial District cluster.
- Achieving a sensible balance with the larger Commercial District cluster and the Central Docks cluster, being seen as distinctly smaller in terms of its number, scale and height from the former.
- Ensuring that the height of the group does not interrupt views to and from the WHS or the visual relationship between the Anglican Cathedral, the WHS, the river and the Wirral.
- Reduce the impact of severance created by the road hierarchy.

8.5.37 The application site is not within the boundary of the Southern Gateway cluster, but it is close by, and it will complement the emerging cluster in its height, scale and massing.

8.5.38 Its height and scale is subservient to the Sefton Quarter tower, which in turn is subservient to the taller buildings in the Commercial District, and also lower than the height parameters approved for some of the buildings included in the Liverpool Waters outline planning application for the secondary cluster at the Clarence Dock.

8.5.39 The development would not interrupt views to and from the WHS or the visual relationship between the Anglican Cathedral, the WHS, the river and the Wirral as set out in the assessment of impact on views above.

8.5.40 The degree of compliance with the guidance is therefore considered to be **medium compliance**.

Specific Design Criteria for High-Rise Buildings

8.5.41 Paragraph 4.6.19 of the SPD sets out additional guidance relating to high-rise development:

- High-rise building proposals should be mixed-use schemes to maximise opportunities for economic and social regeneration. In order to achieve the City Council's principal aim of growth in the city's economy, proposals which will deliver sustainable employment and tourism and which attract long-term inward and indigenous investment, will be preferred.
- The location and siting of high-rise buildings will need to take full account of the grain of the city and reinforce the existing urban structure and hierarchy. Nodes and gateways are of particular importance.
- Public realm treatment associated with proposals should take account of local context, and should relate to the Public Realm Implementation Framework.
- The provision of public access at higher levels, through the creation of restaurants and viewing galleries, will be strongly encouraged.

8.5.42 The proposal accords with the principles of sustainable development relating to employment and housing provision. The location and siting take account of the grain of the area and will play a major part in strengthening the urban structure of the area. A high quality of new public realm is included in the scheme.

8.5.43 The degree of compliance with the guidance is considered to be **medium compliance**.

Summary of Impact Significance

Item	Receptor	Identified Impact	Sensitivity	Magnitude of Impact	Significance of impact
A	Existing development site	Vacant site, low archaeological potential. Development would create a sense of place	Low	Moderate	**Moderate beneficial**
B	Cains Brewery	Neutral impact,	High	Neutral	**Neutral**
C	Stables	None	High	Neutral	**Neutral**
D	St James's Church	None	High	Neutral	**Neutral**
E	St Patrick's Chapel	None	High	Neutral	**Neutral**
F	3-4 Great George Place	None	Medium	Neutral	**Neutral**
View 1	Queens Wharf	None	High	Neutral	**Neutral**
View 2	Great George Street	None	High	Minor	**Moderate beneficial**
View 3	Sefton Street	Minor	Low	Neutral	**Neutral**
View 4	Kings Parade	None	Medium	Neutral	**Neutral**
View 5	Upper Parliamenet Street	Beneficial impact on wider cityscape	High	Neutral	**Neutral**
View 6	Great George Street	None	High	Minor	**Moderate beneficial**
View 7	Woodside Ferry Terminal	None	Very High	Neutral	**Neutral**

Item	Receptor	Identified Impact	Sensitivity	Magnitude of Impact	Significance of impact
View 8	Chaloner Street	None	High	Neutral	**Neutral**
View 9	Mill Street	None	Low	Neutral	**Neutral**
View 10	Park Street	Prominent new feature, but not dominant and view of Liver Building remains	Medium	Neutral	**Neutral**
View 11	Windsor Street	None	Low	Neutral	**Neutral**
View 12	Windsor Street	None	Low	Neutral	**Neutral**
WHS SPD	Character and townscape	Contributes to sense of place			**High compliance**
WHS SPD	Tall buildings in Buffer Zone	Considered relationship to historic landmarks			**High compliance**
WHS SPD	Architectural excellence				**High compliance**
WHS SPD	Views to, from and within WHS				**High compliance**
WHS SPD	Riverside development				**High compliance**
WHS SPD	High-rise buildings in Buffer Zone				**Medium compliance**
WHS SPD	Specific design criteria for high-rise buildings				**Medium compliance**

Item	Receptor	Identified Impact	Sensitivity	Magnitude of Impact	Significance of impact

8.6 Overall Impact on Significance

8.6.1 Considered overall, there will be a **broadly neutral** impact on the significance of heritage assets and OUV, and a high/medium level of compliance with the policies and guidance set out in the WHS SPD.

9 ASSESSMENT OF PROPOSED DEVELOPMENT AGAINST POLICY CRITERIA IN NPPF

9.1 The heritage impact assessment set out above has identified a broadly neutral impact on the significance of heritage assets, with significant beneficial impacts on townscape. A high level of compliance with the policies and guidance contained in the WHS SPD has been identified. This accords with paragraph 137 of the NPPF which states that '*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 or better reveal the significance of the asset should be treated favourabl*y.'

9.2 In my judgement the application proposal complies with the NPPF, as well as local planning policy and guidelines as noted in paragraphs 6.2.1 – 6.2.16 above.