



**BULL HOTEL, BURFORD
OXFORDSHIRE**

**HERITAGE IMPACT ASSESSMENT
AMENDED PROPOSALS
JULY 2023**

www.worlledgeassociates.com



CONTENTS

Worledge Associates

Introduction

Statement of Heritage Significance

Summary of Heritage Policies

Proposal

Assessment of Impact

Conclusion

Appendix 1: Entries in the National Heritage List for England for the Bull Hotel and Post Office

Appendix 2: National and Local Heritage Policies, Guidelines and Advice

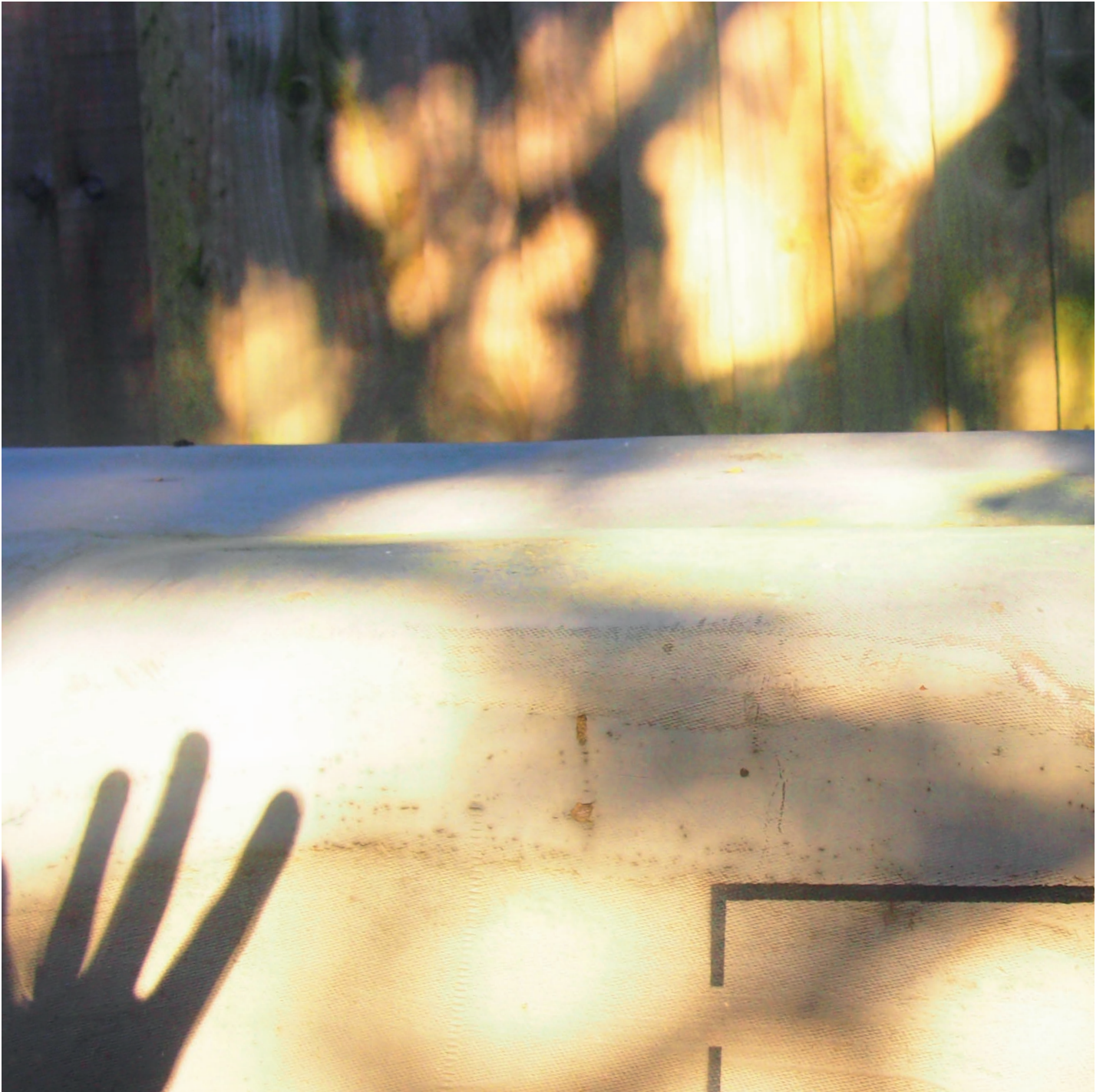
Raymond Osborne
ray@worledgeassociates.com

Elizabeth Pickup
elizabeth@worledgeassociates.com

Patrick Horrocks
patrick@worledgeassociates.com

Nicholas Worledge
nicholas@worledgeassociates.com

WORLLEDGE ASSOCIATES



Worledge Associates is an Oxford-based heritage consultancy, committed to the effective management of the historic environment. Established in 2014 by Nicholas and Alison Worledge, Nicholas came to private practice with over 35 years' experience working in heritage management for local authorities. This intimate knowledge and understanding of council processes, and planning policy and practice, helps us to work collaboratively with owners and decision-makers to manage change to the historic environment.

Our team of dedicated researchers and specialists believe in the capacity of the historic environment to contribute to society's collective economic, social, and cultural well-being. We aim to identify what is significant about places and spaces in order to support their effective management and sustain their heritage value. We have worked with a wide range of property-owners and developers including universities and colleges, museums and libraries, large country estates, manor house, farmsteads, cottages, town houses and new housing sites.

INTRODUCTION



This Heritage Impact Report has been prepared to accompany a Listed Building Consent application for amendments to approved works to the Bull Hotel, which is entered in the National Heritage List for England, grade II, see appendix 1.

It should be read in conjunction to The Bull at Burford, Heritage Report, April 2021, Worledge Associates, which includes brief history of the Burford and of the Bull Hotel, an assessment heritage significance and a statement of heritage significance, in accordance with Historic England Guidelines.

This report provides the relevant National and Local Heritage policies, a summary of the pre-application discussions with officers of West Oxfordshire District Council, an outline of the proposals and an

assessment of the impact, or otherwise, on the heritage significance of The Bull Hotel.

The proposed works will result in some alterations to the current internal visual presentation and external appearance of The Bull Hotel. It is considered, however, that the proposed works, which will improve circulation throughout the building as well as making better use of historic spaces, have been carefully considered. Accordingly, these works together with the previously approved works, involving a considerable level of private investment, will ensure the long-term preservation of this heritage asset, and maintain its heritage significance, in accordance with the intention of National and Local heritage policies.

STATEMENT OF HERITAGE SIGNIFICANCE

For ease of reference, this is reproduced from the April 2021 Heritage Report.

THE BULL INN

The Bull Inn (no. 105) is a multi-phase property extending down a medieval burgage plot on Burford's High Street. It is historically significant both for the stages of evolution it demonstrates in its fabric, as well as for its contribution to the social history of Burford through several centuries. While much of the medieval core of the building has been lost, the small timber-framed gate house over the carriageway (16th century?) survives. There is evidence of a former open gallery on the first-floor rear range, suggestive that the building was an inn prior to the first recorded presence of The Bull as an inn in 1610. The presence of a legible gallery (although altered) is rare and therefore high architectural and historic significance. The carriage way and linear format also reveal the linear development of burgage-plot building forms. Despite a lack of documentary evidence for the building's medieval use, the surviving material evidence holds archaeological significance for its earlier origins.

The list description notes that much of the building was rebuilt c. 1620, and signs of rebuilding are evident in the earlier part of the fabric. It is likely the depressed four-centred arch fireplaces in the front range, and the glazed mullion window to the gallery date to this period of rebuilding. The building saw another phase of works, including a refacing, in 1715. The polite details of the facade, such as the polychromatic brickwork created by the use of burnished and red brick and the Cotswold stone three-storey pilasters and keystones, attests to the good fortunes of its then owner, William Tash, and generally of Burford in the early 18th century. The works regularised the front elevation, and no doubt were intended to present a polite face to visitors to the Bull Inn. As such, the facade and its associated works hold high architectural and historic significance and today contribute positively to the aesthetic of Burford's High Street. Other features to survive from this phase which help to tell the story of this phase include the ground-floor windows with their thick glazing bars.

In the mid 18th century, a rear range spanning the width of the burgage plot, and continuing the carriage way. Burford has a 16th century town hall on the High Street, opposite The Bull, but the range in The Bull has been claimed to have also functioned as a Market Hall. The large, open space was evidently for some kind of communal gathering, whether that be trading or assembly, and is significant for the story it tells of the building's role in Burford social life. The Bull was extended again in the late 19th century, with two large rooms with impressive braced trusses, perhaps also for public functions being added to the rear, which carry historical and architectural significance. In the late 18th /early 19th century, the fortunes of Burford as a market town were diminishing. The evolution of The Bull, which seems to have retained its prosperity through to the 20th century, when it moved from coaching Inn to garage and Inn,

is significant for its long trading history as an Inn. This long history is demonstrated through its fabric and associated documentary evidence.

As the victim of several fires, most recently in 1982, there has been substantial internal rebuilding and loss of historic fabric, which has diminished the significance of some of The Bull's interior. The majority of the lath and plaster wall and ceiling finishes, as well as the original floorboards, are lost and replaced with modern materials. Some historic timber framing survives and is significant for understanding the phasing and history of the building, though there is also much modern non-structural or replacement timber work. Those features which do survive from each main phase (such as the medieval timber-frame 'gatehouse', the stone 17th-century four-centred arch fireplaces, the 18th and 19th century windows) help to tell the story of The Bull over the centuries and carry high historic significance. The features list elaborates on internal features of interest.

NO. 107, FORMER POST OFFICE

No. 107 is a timber-framed building of the late 15th-century. A burgage-plot house, the building has a linear form (similar to The Bull, but with fewer phases). The rendered facade reveals little of the building's medieval origins, though the timber framing, and alterations to it, are evident on the interior of the building. Inspection of the timber framing reveals that the building was once jettied, with a rear passage extending through to the rear of the building. Externally the building contributes positively to Burford's High Street and the High Street, carrying a relationship to its neighbouring buildings, including the Bull Hotel (no. 105) and timber-framed no. 109, both of which are of a similar scale and original age, though display the striking variations of building development through the ages.

While there has been change to the interior of the ground floor (likely because of years of functional alterations which have removed partitions and altered the plan form), structural timbers survive revealing the building's early origins. Braces to support the first-floor chimney stack indicate the ground floor fireplace was located elsewhere and is lost. The front room on the first floor retains an impressive four-centred arch stone fireplace, likely original, which reveals the building to be of some status and contributes to an understanding of the medieval town house. Exposed timber framing throughout the building also reveals important evidence of historic construction techniques. The basement, likely medieval (principal floor joists supported on structural corbels), with possible evidence of a staircase leading from the High Street, carries architectural and archaeological significance. There is evidence of historic flooring (Cotswold slabs on the ground floor of the rear range and timber), which articulates the functional delineation of spaces within the building. The building has functioned as a shop from at least the 18th century and forms part of the public history of Burford's High Street.

SUMMARY OF HERITAGE POLICIE



Conservation principles, policy and practice seek to preserve and enhance the value of heritage assets. With the issuing of the National Planning Policy Framework (NPPF) the Government has re-affirmed its aim that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.

Copse Stile Farmhouse and associated buildings and boundary walls are included in the NHLE, and lies within the Aston Torold Conservation Area, and accordingly, and is subject to the provisions of national policies set out in the National Planning Policy Framework and several Historic England Good Practice Planning Guidelines and Advice Notes, namely.

- Good Practice Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment March 2015 (GPA2)
- Historic England Advice Note 2 – Making Changes to Heritage Assets
- Conservation Principles, Policies and Guidance (2008)

Historic England's approach to effective management of the historic environment is best summed up in paragraph 86 of its 'Conservation Principles' (2008), which states:

'Keeping a significant place in use is likely to require continual adaptation and change; but provided such interventions respect the values of the place, they will tend to benefit public (heritage) as well as private interests in it. Many places now valued as part of the historic environment exist because of past patronage and private investment, and the work of successive generations often contributes to their significance. Owners and managers of significant places should not be discouraged from adding further layers of potential future interest and value, provided that recognised heritage values are not eroded or compromised in the process'.

The site is also subject to Local Planning Policies set out in the West Oxfordshire Local Plan 2018-2031.

The relevant sections of these policies, guidelines, and advice, together with the Local Plan Policies are included at Appendix 2.

PROPOSAL



These are detailed in the planning letter JPPC, dated July 2023, and the submitted plans, and reflect the comments received from West Oxfordshire District Council following the approved application (21/01409/LBC).

In summary, the proposed amendments to the approved plans are as follows.

- Replacement of the lift shaft with a staircase in the rear stair hall of the post office
- Creation of a staircase to the cellar of the post office
- Attic void to be retained in the Bull
- Some changes to external finishes at the rear service buildings
- Internal Layout changes to the outbuilding at the rear of the yard
- Plant to be relocated behind an acoustic screen on the roof of the approved service extension
- Removal of two unstable modern chimneys

ASSESSMENT OF IMPACT

It was recognised in the approval of the earlier proposals (21/01409/LBC) that the Bull Hotel required significant investment in order to remain economically viable in its primary use as a hotel. The approved plans acknowledged that some change was required both internally and externally to facilitate this. These amendments to the proposals seek to achieve this objective as well as work with the building following findings during works which have required amendments in order to preserve historic material and further enhance other areas of the building.

Replacement of the lift with a stair

It was found during the initial phases of work that more material than initially expected would need to be removed from the cellar in order to install the lift well within the post office. It was decided that the installation of the lift was no longer viable, both economically and in respect of the amount of potential intervention to historic fabric in the cellar.

To maintain access between the floors of the post office it is proposed to install a timber staircase within the area where the lift was previously located. This will involve the removal of both historic and modern fabric within the ceiling but is no more interventionist than the approved proposals and is therefore considered to not cause any additional harm. The reduced intervention now required to the stone in the cellar through the removal of the lift shaft from the scheme preserves a greater level of historic fabric than initially approved. The internal stair also removes the requirement for the approved external steel stair, further reducing clutter to the rear of the building and enhancing the appearance of the rear of the post office when viewed from the yard.

In order to maintain correct fire screening an enclosure is to be created on the landing at the first floor level. The outer walls of which will replace existing modern partitions in very slightly altered positions. Whilst it would be desirable to keep the landing open, from a spatial quality perspective, this would result in further fire doors or corridors having to be introduced within bedrooms and would result in both a poorer guest experience and a greater level of interruption to the higher quality bedroom spaces. The replacement and reconfiguration of modern partition walls within the landing space does not affect the room's heritage significance nor the contribution it makes to that of the building.

In order to retain accessibility to the upper floors of the building a lift will be located within the approved service extension north of the post office yard.

Creation of staircase to Cellar in the Post Office

The previously approved proposals required that the ceiling be lowered in the central corridor of the Post Office cellar between the front and rear rooms. These proposals acknowledged that the fabric to be removed was heavily altered, in a poor state of repair and not of any particular heritage significance. Lowering the ceiling effectively severed the link between the front and back rooms which left the front room without access and redundant.

The amended plans propose creating a staircase from the ground floor to the room at the front. The construction will require the same level of intervention to the ground floor joists and floorboards as was approved within application (21/01409/LBC), discussed above. The link between the front and rear rooms of the cellar will remain severed, however, there will now be active use of the front room allowing users to experience the historic space. It is proposed that this be a wine tasting area for guest use which will also allow a greater range of users to experience it rather than the previous hotel storage use.

Access to the rear room will be covered over, but the steps will remain in-situ so that access can be gained for maintenance purposes and should the buildings configuration be returned to the current layout. It is considered that the amendments to the plans approved under 21/01409/LBC do not result in any changes to the level of harm to existing building fabric but provide a small enhancement through the improved opportunity for a wider range of users to experience the front cellar room.

Attic Void to be Retained in the Bull

The approved plans (21/01409/LBC) showed removal of floor joists and ceiling fabric in order to create a void and mezzanine above two bedrooms. This element of the earlier scheme is now not to be built, retaining the attic room above for storage, and use of the 19th century narrow staircase serving it. This amendment does not have an effect on the heritage significance of the building.

External Aesthetic Alterations

The amended proposals call for a change of materiality to the timber infill at the converted outbuildings at the rear of the yard. The building is at the very rear of the yard, visible only from within the curtilage of the hotel and its appearance has been altered in earlier redevelopment schemes. The change from timber to render in a clearly adapted building does not alter the contribution of this element to the heritage significance of the Bull nor the conservation area.



Timber cladding to be replaced with render



Modern timber door to be replaced with a window following removal of the external fire escape

A modern timber louvred vent is proposed to be replaced with a sash window. The outward appearance of this building is of an altered outbuilding, replacing modern fabric with that of a different type doesn't alter the heritage significance of the building, site or its contribution to the conservation area.

It is proposed that the door which lead to the external fire escape over the carriageway to the west of the Bull's yard is replaced with a window. The door is not historic fabric and the removal of the fire escape results in access no longer being possible from this opening. There is no harm to the building's heritage significance through its replacement.



The carriageway which connects the Bull's yard to that of the Post Office. The doorway to be filled to the right of the image



The end elevation of the easternmost outbuilding viewed from the postoffice yard. The timer louvre is to be replaced with a window and a window opening created to serve the ground floor below

Internal Changes to The Layout of the Rear Outbuilding

The eastern end of the outbuildings are no longer to serve as treatment rooms and will instead form additional bedrooms. The proposals call for insertion of a partition wall within the northern room of the first floor in order to separate the space into a guest bathroom and storage for hotel use. The insertion of the partition wall does not affect any historic fabric and is completely reversible, causing no harm.

In the room to the south of the building the existing doorway is to be blocked (as within approved application 21/01409/LBC) with a new opening created to its south. This allows access beneath the staircase from the carriageway to, what is proposed to become, a

guest bedroom. The building fabric removed to create the opening will be reused to block the existing opening, the fabric is of no particular significance and the building displays evidence of several earlier interventions where it has been reconfigured in order to fulfill changing requirements. In this respect the proposals continue this story of an evolving building, the interventions are kept to a minimum to ensure the viable use of the building and cause no harm to its heritage significance.

On the southern elevation the proposals call for the replacement of the approved bi-fold doors with a smaller glazed opening. There is a reduction in the amount of fabric removed in this already significantly altered elevation and the amendments to the earlier scheme cause no additional harm.



Current plant equipment to be relocated from the Post Office yard

Relocation of Plant

It is proposed to relocate the plant for the kitchen on the roof of the approved timber clad extension. This will reduce clutter in the yard of the post office as well as facilitate removal of external vent ducting. The plant will be concealed behind an acoustic screen which is set back from the extension's timber clad façade so as to minimise its visibility. It is considered that the removal of clutter and noise from the post office's yard provides a small enhancement to the building's significance.



The tall modern chimney to the easternmost building at the rear of the Bull. Unstable it is proposed to be removed

Removal of Two Chimneys

The chimneys to be removed are both of modern fabric, the easternmost is also in a modern location. They are both unstable and at risk of collapse. The removal of modern fabric which clutters the roof line of the rear service buildings is seen to provide a small enhancement to the building's significance.

CONCLUSION



In conclusion the proposals secure viable use of the Bull Hotel and overcome challenges discovered during the build process for the approved scheme 21/01409/LBC. A holistic approach needs to be taken when working on historic fabric in order to minimise intervention while facilitating 21st century expectations of users. The proposed amendments to the approved scheme result in no further harm to the

heritage significance of the Bull Hotel, achieving some small positive enhancements, through mitigating potential harms, based on findings during the earlier build process. The proposed amendments have been kept to a minimum and have no affect on the special character of the Burford Conservation Area.

APPENDIX 1: ENTRIES IN THE NATIONAL HERITAGE LIST FOR ENGLAND FOR THE BULL HOTEL AND POST OFFICE

BURFORD AND UPTON HIGH STREET AND SIGNET (East Side)
SP2512 (Enlargement) **The Bull Hotel** 7/80 12.9.55

GV II*

Coaching inn; mediaeval core; largely rebuilt c.1620; refronted c.1715 for William Tash and interior altered early C20. Burnt 1982, and subsequent restoration. Brick front, ashlar dressings and ground floor. 3 storeys: 4 bays. Red and blue bricks with rubbed brick window jambs and voussoirs with stone imposts and keys, ashlar full-height pilasters with egg and dart caps, heavy moulded cornice, brick parapet matching front, 4 blind panels. 3 windows on ground floor, glazing-bar sashes, with cock beads and keys, the 2 right-hand windows and the door to right in ashlar break over cellar. Outer doors. Coachway to left: staff-mould to square head with double key, brackets to wooden hood. Flagged passage and alley. 2-storey rear wing with C17 timber-frame to front masking gallery, closed at East end by Cross building also with carriageway under; C19 2-storey stables wing continues beyond. Interior: Ground floor front room raised on cellar and has two Tudor-arched fireplaces; further Tudor-arched fireplaces to 1st and 2nd floor front rooms, with ball and bottle stops to 1st floor jambs; cross-beamed room to rear; gabled wing above rear of front carriageway has wind braces. See Michael Laithwaite in *Perspectives in Urban History* (1973 ed Everitt).

BURFORD AND UPTON HIGH STREET AND SIGNET (East Side)
SP2512 (Enlargement) **No 107 (Burford News)** 7/82 (previously listed as 12.9.55 "Premises adjoining Bull Hotel to the South)

GV II

House with shop premises. Late mediaeval remodelled C18 or early C19. Front rendered over timber-frame, coped verges to Cotswold stone roof, to left an ashlar corniced chimney (actually belonging to the Bull Hotel (q.v.). L-plan, originally only one room deep. 3 storeys, attic and cellar. One gabled dormer. 2 windows, wide-paned sashes with architraves. Interior: evidence of jettied upper floors, heavily braced posts and beams to ground and 1st floors, evidence of cill plates to front and rear posts; chamfered joints on 1st floor. On first floor a Tudor arched fireplace with wide frieze, smaller Tudor-arched fireplace with similar detail in rear extension; well or cistern below of considerable diameter. 2-storey rear extension of 3 bays with timber-framed 1st floor and a further 3-bay extension of one storey and attic.

APPENDIX 2: NATIONAL AND LOCAL HERITAGE POLICIES AND GUIDELINES

NATIONAL PLANNING POLICY FRAMEWORK

Conservation principles, policy and practice seek to preserve and enhance the value of heritage assets. With the issuing of the National Planning Policy Framework (NPPF), the Government has re-affirmed its aim that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.

In relation to development affecting a designated heritage asset the NPPF states in paragraphs 199 and 200 that:

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

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.’

Paragraph 197 of the NPPF, however, also advises Local Planning Authorities that:

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

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

THE PLANNING PRACTICE GUIDANCE

This seeks to provide further advice on assessing the impact of proposals explaining that what matters in assessing the level of harm (if any) is the degree of impact on the significance of the asset. It states:

‘In determining whether works to a listed building (or its setting) constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed.’

The NPPF explains in paragraphs 201 and 202 the differences between ‘substantial’ harm and ‘less than substantial’ harm, advising that any harm should be justified by the public benefit of a proposal.

In cases where there is less than substantial harm, paragraph 202 states:

‘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’.

The PPG also seeks to provide a clearer understanding of what constitutes ‘public benefit’, as it is the public benefit that flows from a development that can justify harm. In weighing the public benefits against potential harm, considerable weight and importance should be given to the desirability to preserve the setting of listed buildings.

Public benefits can flow from a variety of developments and could be anything that delivers economic, social, or environmental progress as described in the NPPF, paragraph 8.

They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. It explains that public benefits can include heritage benefits, such as:

- Sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- Reducing or removing risks to a heritage asset
- Securing the optimum viable use for a heritage asset.

HISTORIC ENGLAND ‘CONSERVATION PRINCIPLES’ (2008)

Works of alteration, extension, or demolition need not involve any harmful impact and may be necessary to ensure a building has a viable future. Historic England explains its approach to managing the historic environment and how we experience places stating in ‘Conservation Principles’ (April 2008) paragraph 88:

‘Very few significant places can be maintained at either public or private expense unless they are capable of some beneficial use; nor would it be desirable, even if it were practical, for most places that people value to become solely memorials of the past’.

It also points out in paragraph 92:

‘Retaining the authenticity of a place is not always achieved by retaining as much of the existing fabric as is technically possible’.

It also comments in paragraph 86:

'Keeping a significant place in use is likely to require continual adaptation and change; but provided such interventions respect the values of the place, they will tend to benefit public (heritage) as well as private interests in it. Many places now valued as part of the historic environment exist because of past patronage and private investment, and the work of successive generations often contributes to their significance. Owners and managers of significant places should not be discouraged from adding further layers of potential future interest and value, provided that recognised heritage values are not eroded or compromised in the process'.

Further, in relation to new works and alterations in paragraph 138 states:

New work or alteration to a significant place should normally be acceptable if:

- a) there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place.
- b) the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed.
- c) the proposals aspire to a quality of design and execution which may be valued now and in the future.

Amongst the Government's planning objectives for the historic environment is that conservation decisions are properly informed.

HISTORIC ENGLAND'S 'GOOD PRACTICE ADVICE NOTES 3: THE SETTING OF HERITAGE ASSETS'

Paragraph 19, of this practice note, explains that.

'Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset'.

From this summary of the national heritage management policy framework, it is clear that there is a complex assessment decision-making process to navigate when considering change within the historic environment.

Central to any decision is the recognition that history is not a static thing, and that the significance of our historic environment derives from a history of change.

S66 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

Section 66 of the Act requires local planning authorities to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

The policies and advice described above provide an essential

framework to guide designers and decision makers. In this respect it is worth noting recent case law and the advice it offers on the application of policy and legislation as set out below.

Barnwell Manor Wind Energy Ltd v East Northants District Council, English Heritage and National Trust, 18th February 2014, and Sevenoaks District Council v The Forge Field Society, March 2014, have brought into sharp relief the weight and importance that decision makers should give to the duty under Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that special attention shall be paid to the desirability

of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

In Jones v Mordue & Anor [2015] EWHC 539, the Court of Appeal explains how decision makers can ensure this duty is fulfilled: a decision maker will have complied with the duty under sections 16, 66(1) and 72 by working in accordance of the terms of the NPPF paragraphs 131-134. This report follows this advice to ensure consistency with the duty to preserve or enhance.

In the Court of Appeal [Catesby Estates v Steer and SSCLG, 2018] the concept of setting was explored. In paragraph 15 of the judgement Justice Lindblom rehearses the Planning Inspector's considerations, commenting that the Inspector found it difficult to disassociate landscape impact from heritage impact. The focus of the judgement is to determine the extent

to which visual and historical relationships between places contribute to define the extent of setting. Three general conclusions are made:

- a) The decision maker needs to understand the setting of a designated heritage asset, even if it cannot be delineated exactly;
- b) There is no one prescriptive way to define an asset's setting - a balanced judgement needs to be made concentrating on the surroundings in which an asset is experienced and keeping in mind that those surroundings may change over time;
- c) The effect of a development on the setting of a heritage asset and whether that effect harms significance.

WEST OXFORDSHIRE LOCAL PLAN HERITAGE POLICIES

The West Oxfordshire Local Plan 2031 was adopted in September 2018. Section 6 deals with the historic environment and the foreword states that:

West Oxfordshire is fortunate to benefit from an extremely rich and varied historic environment. This plays a key role in defining the distinctive character of the District and the individuality of its settlements, contributing greatly to the area's culture, economy and tourism and to the overall quality of life enjoyed by current and future generations. The historic environment is not limited to the built environment and archaeological sites, but includes landscapes, both rural and urban, identified as having a degree of significance by virtue of their historic, archaeological, architectural, cultural or artistic interest: all contribute to local identity.

The policies relevant to the proposals are reproduced below.

POLICY EH9: HISTORIC ENVIRONMENT

All development proposals should conserve and/ or enhance the special character, appearance and distinctiveness of West Oxfordshire's historic environment, including the significance of the District's heritage assets, in a manner appropriate to their historic character and significance and in a viable use that is consistent with their conservation, in accordance with national legislation, policy and guidance for the historic environment.

In determining applications, great weight and importance will be given to conserving and/or enhancing the significance of designated heritage assets, including:

- the outstanding universal values for which Blenheim Palace and Park is inscribed as a World Heritage Site (WHS), as guided by its WHS Management Plan (see also Policy EW9);
- the special architectural and historic interest of Listed Buildings, with regard to their character, fabric and their settings;
- the special architectural and historic interest, character and/or appearance of the District's Conservation Areas and their settings, including the contribution their surroundings make to their physical, visual and historic significance;
- the special archaeological and historic interest
- of nationally important monuments (whether Scheduled or not), both with regard to their fabric and their settings;
- the special cultural, architectural and historic interest of Registered Parks and Gardens, including the contribution their surroundings make to their physical, visual and historical significance.

Significant weight will also be given to the local and regional value of non-designated heritage assets, including non-listed vernacular buildings (such as traditional agricultural buildings, chapels and mills), together with archaeological monuments that make a significant contribution to the District's historic environment.

All applications which affect, or have the potential to affect, heritage assets will be expected to:

- a) use appropriate expertise to describe the significance of the assets, their setting and historic landscape context of the application site, at
 - a) level of detail proportionate to the historic significance of the asset or area, using recognised methodologies and, if necessary, original survey. This shall be sufficient to understand the potential impact of the proposal on the asset's historic, architectural and archaeological features, significance and character;
- b) demonstrate that the proposal would, in order of preference:
 - avoid adverse impacts on the significance of the asset(s) (including

those arising from changes to their settings) and, wherever possible, enhance or better reveal the significance of the asset(s);

- minimise any unavoidable and justified (by the public benefits that would accrue from the proposed development – see below) adverse impacts and mitigate those impacts in a manner proportionate to the significance of the asset(s) and the nature and level of the impact, investigate and record changes to or loss of physical fabric, features, objects or other remains and make the results publicly available.
- c) demonstrate that any new development that would result in the unavoidable and justified loss of all or part of a heritage asset would proceed within a reasonable and agreed timetable that makes allowance for all necessary safeguarding and recording of fabric and other remains, including contingencies for unexpected discoveries.

Designated assets

Proposals which would harm the significance of a designated asset will not be approved, unless there is a clear and convincing justification in the form of substantive tangible public benefits that clearly and convincingly outweigh the harm, using the balancing principles set out in national policy and guidance.

POLICY EH10: CONSERVATION AREAS

Proposals for development in a Conservation Area or affecting the setting of a Conservation Area will be permitted where it can be shown to conserve or enhance the special interest, character, appearance and setting, specifically provided that:

- the location, form, scale, massing, density, height, layout, landscaping, use, alignment and external appearance of the development conserves or enhances the special historic or architectural interest, character and appearance of the Conservation Area;
- the development conserves or enhances the setting of the Conservation Area and is not detrimental to views within, into or out of the Area;
- the proposals are sympathetic to the original curtilage and pattern of development and to important green spaces, such as paddocks, greens and gardens, and other gaps or spaces between buildings and the historic street pattern which make a positive contribution to the character in the Conservation Area;
- the wider social and environmental effects generated by the development are compatible with the existing character and appearance of the Conservation Area; and
- there would be no loss of, or harm to, any feature that makes a positive contribution to the special interest, character or appearance of the Conservation Area, unless the development would make an equal or greater contribution.

Applications for the demolition of a building in a Conservation Area will only be permitted where it has been demonstrated that:

- the building detracts from or does not make a positive contribution to the special interest, character or appearance of the Conservation Area; or
- the building is of no historic or architectural interest or is wholly beyond repair and is not capable of beneficial use; and
- any proposed replacement building makes an equal or greater contribution to the special interest, character or appearance of the Conservation Area.

Wherever possible the sympathetic restoration and re-use of buildings that make a positive contribution to the special interest, character and appearance of

a Conservation Area will be encouraged, thereby preventing harm through the cumulative loss of features which are an asset to the Conservation Area.

POLICY EH11: LISTED BUILDINGS

Proposals for additions or alterations to, or change of use of, a Listed Building (including partial demolition) or for development within the curtilage of, or affecting the setting of, a Listed Building, will be permitted where it can be shown to:

- conserve or enhance the special architectural or historic interest of the building's fabric, detailed features, appearance or character and setting;
- respect the building's historic curtilage or context or its value within a group and/or its setting, including its historic landscape or townscape context; and
- retain the special interest that justifies its designation through appropriate design that is sympathetic both to the Listed Building and its setting and that of any adjacent heritage assets in terms of siting, size, scale, height, alignment, materials and finishes (including colour and texture), design and form.

POLICY EH12: TRADITIONAL BUILDINGS

In determining applications that involve the conversion, extension or alteration of traditional buildings, proposals will not normally be permitted where this would:

- extensively alter the existing structure or remove features of interest;
- include extensions or alterations which would obscure or compromise the form or character of the original building.