

**Broads Authority Local List of Heritage Assets: Consultation Process and  
Adoption of Local List**

Report by Historic Environment Manager

**Summary:**

The Broads Authority has a strategic priority for 2012/13 to produce a list of local heritage assets in order to better understand and manage the cultural heritage of the area. There has been member and community involvement in the selection of entries for the list and stakeholder and community consultation on the assets initially selected for inclusion.

The purpose of this report is to give members the opportunity to consider a summary of the responses received during the public consultation exercise and consider the formal adoption of a list of local heritage assets.

It is intended that assets will continue to be added to the list in the future.

**Recommendation:** That members note the comments received during the consultation process and agree the adoption of a Broads Authority Local List of Heritage Assets and agree those assets listed in Appendix 2 for inclusion on the List.

## **1 Introduction**

- 1.1 Previously Members of the Broads Authority Heritage Asset review group (HARG), in accordance with their terms of reference agreed by Broads Authority Planning Committee, received a report on the adoption of a list of local heritage assets. Many heritage assets, whilst not of sufficient historical or architectural merit to warrant being included on the national list, still make a positive contribution to the cultural heritage of the Broads area and there are advantages to identifying these. HARG Members agreed criteria for inclusion and an adoption process. This would involve the Community both in the nomination of assets and in a public consultation exercise with other stakeholders, on the initial list of assets to be selected.

- 1.2 The criteria for inclusion of assets on a local list agreed by HARG members included, identifying likely asset types, along with other factors which might justify inclusion on the list – such as rarity, fragility and vulnerability. It was decided that assets other than buildings might also be included especially those which were significant to local communities. The criteria for adoption are appended - Appendix 1.
- 1.3 The Authority held workshops with Parish Councils and other stakeholders on the concept of a local list. The workshops explained the criteria for selection and included training in the identification of assets and the nomination process for putting forward heritage assets for inclusion on a local list.
- 1.4 Presentations were also given to two Parish Forums on the concept and adoption of a local list.
- 1.5 It was further agreed to include thematic groups of buildings identified by the Broads Authority historic environment team to be put forward for nomination and through the public consultation exercise.
- 1.6 The adoption of a local list of heritage assets is a Broads Authority strategic priority for 2012 -2013.

## **2 A List of Local Heritage Assets.**

- 2.1 The Broads executive area contains 272 nationally listed buildings and 12 scheduled ancient monuments. The area also contains either wholly or partly within the Broads boundary 25 Conservation Areas. In addition to these statutory designations the area contains a wealth of cultural heritage in many cases these undesignated heritage assets have very limited protection and are often not identified as being of significance.
- 2.2 Although not currently identified as heritage assets, many of the undesignated assets undoubtedly make a positive contribution to the cultural heritage and character of the area and the enjoyment of it.
- 2.3 It is considered that the adoption of a list of local heritage assets will positively identify and catalogue these contributors to the cultural heritage of the Broads. Furthermore through the identification and listing of undesignated heritage assets the Authority will gain a better understanding of the cultural heritage of the area.
- 2.4 A local list will also enable officers and members to give consideration to the significance of these assets when determining planning applications and development and management proposals.

- 2.5 There are policies contained both within the Broads Authority adopted Core strategy - Policy CS5 referring to the development of a local list, and in the Broads Authority adopted development plan document - Policy DP5 referring to locally designated heritage assets.
- 2.6 The recently adopted National Planning Policy Framework (NPPF) makes specific reference to Local Planning Authorities (LPAs) identifying a list of local heritage assets in order to better understand and preserve the cultural heritage of their area. The historic environment section of the document requires LPAs to take into account the significance of non-statutorily designated heritage assets when determining a planning application.
- 2.7 Recently published English Heritage guidance encourages LPAs to adopt a list of local heritage assets (a local list) in order to develop a better understanding and better preserve and enhance the cultural heritage of its area.
- 2.8 The adoption of a local list for the Broads would better serve the priorities of the Authority to preserve, protect and enhance its historic environment in line with current Government Planning Policy and English Heritage guidance and Broads Authority adopted Core strategy and development plan document policies.

### **3 Public and Stakeholder Consultation.**

- 3.1 Despite the well attended workshops and parish forums, the response rate for nominations put forward by the community was disappointing with eight assets being nominated. These assets were discussed at HARG along with the thematic group of buildings - Non Listed mills - nominated by Broads Authority officers.
- 3.2 All nominations were assessed initially by officers in accordance with the criteria agreed by HARG. All nominations were then discussed and those to be put forward for public consultation agreed by members of HARG.
- 3.3 In the case of those nominations not considered to meet the criteria, a letter was sent to the nominator explaining the reasons for the decision.
- 3.4 In line with the Broads Authority Statement of Community Involvement and English Heritage guidance on the production of a local list of heritage assets, Members of HARG agreed that the Authority carry out a public and stakeholder consultation exercise on the nominations for inclusion on the local list.

- 3.5 The consultation exercise included those assets nominated by the community and also the thematic group put forward by the Broads Authority historic environment team. Assets put forward for inclusion on the local list and included in the consultation exercise are appended Appendix 2.
- 3.6 In each case the owner of the asset was contacted and invited to comment on the proposed designation. The nominator of the asset and relevant parish council were also consulted. Other stakeholders such as English Heritage and other amenity societies including the Broads society were consulted.
- 3.7 The consultation period ran from 24 April 2012 to 15 May 2012.
- 3.8 The consultation, although disappointing in terms of number of responses, was, where a response was received, extremely positive in supporting a list of local heritage assets. Responses were also received providing additional detailed information as regards individual assets.
- 3.9 Overall, seven responses were received, none of which objected to the inclusion of an asset on the local list. Suggestions were received for additional assets to be included by two Parishes – these will be subject to future review. English Heritage expressed their support for a local list as did Suffolk County Council. Four responses offered additional information regarding assets and five responses positively supported the adoption of a local list. Two responses did not comment positively or negatively on the list merely offering additional information. There were no negative responses or objections to the adoption of a local list or the inclusion of an individual asset that had been identified for inclusion. A table of the responses received is appended – Appendix 3.

#### **4 Assessment**

- 4.1 Whilst the response to the nomination process and consultation exercise was disappointing. The responses received were in support of the provision of a local list of heritage assets. In addition the workshop and training event was well supported and parishes expressed enthusiasm for a local list both at this and at Parish Forum events.
- 4.2 The consultees including the owners of the buildings were invited to comment on the inclusion of the asset on a local list and informed that any comments received would be considered by Broads Authority members prior to the adoption of a local list. No negative comments were received as a result of the consultation process.
- 4.3 Responses received did give additional information regarding individual assets suggesting an interest of the inclusion of the asset and an accurate description

of it and its history on a local list. This additional information will be added to the description of the asset following verification.

- 4.4 The lack of negative response from owners of the assets that have been nominated suggests an acceptance of the concept of a local list if not a positive support for it. Each owner was written to and sent a copy of a brief description of the significance of the asset along with an explanation of the implications regarding the inclusion of an asset on the local list. Each consultee was also sent an explanation of the local list, its purpose, implications of inclusion and criteria for selection.
- 4.5 Although the local list nominations and consultation exercise pre-dates the recently published English Heritage guidance officers, aware of the forthcoming guidance, invited the English Heritage team drafting the guidance to the Broads. They were able to offer advice as to the particular issues regarding the area which resulted in the criteria for selection, the selection process and the consultation exercise being carried out in accordance with the now published guidance.
- 4.6 The Broads Authority adopted Core strategy and Development Management Policies refer to the adoption of a list of local heritage assets. The NPPF encourages the protection of non statutorily designated heritage assets and the Government's advisors on the historic environment English Heritage have recently published guidance on the production of a list of local heritage assets.
- 4.7 The production, adoption and publication of a local list of heritage assets, is therefore, considered to accord with Broads Authority strategic aims and national policy and guidance.

## **5 Future Management and Additions to List**

- 5.1 One issue raised by the nomination and the consultation process was the lack of community and stakeholder response in each instance. In the case of the nominations the lack of response was particularly disappointing given the coverage of the development of a local list at two Parish forums and the well attended workshop session. Although initially disappointing, it is hoped that the adoption and subsequent publication of a local list will encourage further nominations in the future.
- 5.2 It is intended to review the list annually by inviting parishes to put forward nominations. In addition, a thematic group of buildings will be nominated by the Broads Authority Historic Environment team. This will enable the list to be continually added to and for assets which are no longer considered worthy of inclusion to be removed from the list.

5.3 This annual appraisal will form the basis of further reports to both the Broads Authority HARG and Planning Committee.

## **6 Financial implications**

6.1 There are limited financial implications in adopting a local list of heritage assets for both the Broads Authority and the owners of the assets proposed to be included in the list.

6.2 For the owners of the assets there maybe a minor additional financial implication by having to provide information regarding the significance of a heritage asset, how an asset might be affected by development or how the impact of a proposed development might be mitigated. This additional information may be required when submitting a planning application for development.

6.3 For the Broads Authority there maybe a minor additional financial implication in assessing additional information received as part of an application for development. There maybe a medium financial implication in the preparation, administration and continuing management of a local list of heritage assets.

6.4 It is considered that both in the case of the owner of the asset and the Broads Authority that in achieving greater understanding and protection and enhancement of the Broad's cultural heritage in line with Broads Authority strategic priorities and Government guidance that these financial implications are outweighed.

6.5 The Authority has a Cultural heritage budget of £25,000 part of which will be used to fund the preparation, administration and continuing management of a local list of heritage assets.

## **7 Legal implications**

7.1 There maybe legal implications as regards data protection for the publication of a local list. Any publication should comply fully with the Data protection Act and the appropriate legal advice will be sought.

## **8 Conclusions**

8.1 The consultation exercise has produced a mainly positive response with no negative response to either the concept of a local list of heritage assets or inclusion of individual assets.

8.2 Whilst the lack of response is disappointing, the consultation offered an

opportunity to formally object to inclusion of an asset on the list and a process whereby any objection would be formally reviewed by members. Given that no objections were received as a result of the consultation process it may be reasonable to assume a general level of agreement to the adoption of a list of local heritage assets.

- 8.3 The adoption of a local list would be in accordance with Broads Authority strategic priorities, Broads Authority adopted Core Strategy and development management policy and the national planning policy framework.
- 8.4 If agreed by members, the local list of heritage assets will be adopted and will be published on the Broads Authority website.
- 8.5 It is therefore considered that:
- (i) the assets identified in Appendix 2 are worthy of inclusion on a local list; and
  - (ii) members note the comments received during the consultation process and agree the adoption of a Broads Authority Local List of Heritage Assets and agree those assets listed in Appendix 2 for inclusion on the List.

Background Papers: Nil

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List of Appendices: Appendix 1: Consultation Letter and Criteria for Adoption  
Appendix 2: Local List Candidates and Reasons for Inclusion  
Appendix 3: Local List for the Broads Authority Area Consultation Responses. July 2012

## CONSULTATION LETTER AND CRITERIA FOR ADOPTION

**Address**

Dear **Name if known or Owner/Occupier**,

**Local List of Heritage Assets in the Broads Authority Executive Area:*****Insert Name of structure.....***

I am writing to you as we understand that you are the owner of the above structure. If this is not the case, please pass this letter on to the appropriate person, and please let us know who to contact. If you do not know who owns the structure, I would be grateful if you could also let us know.

The Broads Authority as Local Planning Authority and has resolved to compile a Local List of buildings and structures (Heritage Assets) that whilst not of sufficient importance to be nationally listed (a Listed Building), nevertheless make a contribution to the special character of the area. Many Local Authorities across the country already have a list of locally important Heritage Assets and English Heritage has just issued guidance on good practice for local listing. Attached to this letter is a brief description of the reasons and criteria for a Local List in the Broads Authority area.

The purpose of this letter is to alert you to the fact that we are considering whether the above structure should be included in the Broads Local List of Heritage Assets.

We consider its significance to the local area to be;

**Brief description/statement of significance *from table for each structure here please***

The inclusion of this structure on our Local List would not increase any Planning controls that already apply to it, but is aimed at raising awareness of its contribution to the special character of the Broads area and to help the Authority when making decisions about planning applications. The Local List is linked to policies in the Local Development Plan and will therefore be taken into account when development proposals which impact on the special character of the area are being considered.

A Heritage Asset included on the Local List will not make it more accessible to the general public than it is already. No access is required to the interior of the structure and the Authority's Historic Environment team will carry out all surveys and photographs from public land, unless permission for closer inspection is given by the owner.

We are consulting all owners of structures being considered for Local Listing as part of the assessment process. Owners can often provide additional valuable information which can assist with the decision about whether or not to add the structure to the List. However, we ask that your comments relate to the architectural or historic interest of the building, as



issues such as development potential, personal preference or privacy cannot be taken into consideration.

If you would like to make any comments about the inclusion of this structure in the Local List, please send them to the above address within **21 days** of the date of this letter, so that they can be taken into consideration by the Review Panel before a decision is made.

In the meantime, if you have any questions about this, please contact me

Yours faithfully,

Ben Hogg  
Historic Environment Manager  
The Broads Authority

## **CRITERIA FOR ADOPTION**

### **Local List for the Broads Authority Executive Area.**

#### **Introduction.**

There are over 270 Listed Buildings in the Broads Authority area. These are buildings considered to be of architectural or historic interest and are therefore included in the national Statutory List, and given protection through special planning controls.

There are many more historic buildings or structures which may not meet the national criteria for listing, but nevertheless make the Broads a special place by creating a sense of local distinctiveness and by contributing to the local character, for example through their appearance or their local historical associations. Examples of these could include an old house, a traditional agricultural building or bridge. These buildings and structures are part of our heritage and once lost, cannot be replaced. They are not given any special protection, unless they are in a conservation area.

#### **The purpose of a Local List.**

Although inclusion on a local list does not change the existing planning controls that already apply to the building, there are several reasons why such a list is important;

- To raise awareness of the area's special heritage and its importance to local distinctiveness
- To inform owners, the local community, developers, Council officers and Members about buildings which the authority considers make a special contribution to the landscape of the Broads.
- To help the Authority when making decisions about development proposals and planning applications and their effect on the character of the area
- To provide guidance and specialist advice to owners to help protect the character and setting of buildings

**Implications of inclusion on list** – although they are not statutorily protected, the Local List is linked to policies in the Local Development Plan.

#### **Criteria for selection**

- a. Age & integrity
- b. Historic interest – historic association (people or events), social importance, 'lost' lifestyle (e.g. drainage pumps & marsh cottage settlements)
- c. Architectural interest or merit
- d. Technological innovation or excellence
- e. Visual/scenic/artistic or group value

Inclusion would depend on satisfying at least two of the above.

**Type of record / publicity** – Each entry is listed by Parish with the address. A brief description and reason(s) for its inclusion, history (if known or relevant) and brief notes about its condition and any images are retained by the Broads Authority for internal use only.

**How are structures chosen for inclusion?** Entries for the List can be put forward by Parish Councils or individuals and the local authority. Nominations are assessed by the Broads Authority historic environment team and a group of Local Authority members before being agreed. The List will be periodically reviewed and extensive alterations to the structure originally included could mean its removal.

**Summary of process** – Assets put forward for inclusion will be assessed by the Broads Authority historic environment team as to their suitability for inclusion on the list. Assets then go before Broads Authority members to agree them going forward to consultation. Owners of the asset and the Parish council will then be consulted and invited to comment about the potential inclusion, the consultation period will be 21 days. At the end of the consultation process the responses will be analysed and summarised and presented to local authority members along with an officer recommendation regarding inclusion. A decision will then be made.

**What kind of structure is eligible?** – The criteria for inclusion relate to the built environment and the list will include built structures rather than natural landscape features.

Examples could include;

Parks & Gardens, allotments (built structures)

Industrial buildings, such as;

- Agricultural buildings
- Drainage pumps
- Boat sheds
- Boat yards
- Transport structures (e.g. bridges and locks)

Waterside structures

Military installations

Monuments, statues, milestones, commemorative plaques

Domestic buildings

Religious buildings and cemeteries

Public buildings (e.g. schools and village halls)

## APPENDIX 2

### Local list candidates and reasons for inclusion

Name	Reason for inclusion in local list
<b>Drainage mills and engine houses</b>	
<b>River Ant</b>	
Wayford Mill, Dilham Dyke, Smallburgh	One of an important group of drainage mills in the Broads area and a feature in the landscape.
Barton Broad Drainage Mill, Catfield	The substantial remains of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Moy's Drainage Mill, Stalham	Although truncated and in poor condition, the remnants of one of an important group of drainage mills in the Broads area.
Clayrack Windpump, How Hill, Ludham	Hollow post mill. An unusual and important example of the development and history of drainage of the Broads marshes, one of an important group of drainage mills in the Broads area and a feature in the landscape.
Ludham Bridge (north)	The substantial remains of one of an important group of drainage mills in the Broads area and a feature in the landscape
Ludham Bridge (south)	The site of one of an important group of drainage mills in the Broads area.
Middle Marsh Drainage Mill, Catfield	One of an important group of drainage mills in the Broads area and a prominent feature in the landscape.
<b>River Bure</b>	
Charlie Water's Mill, Acle	The remains of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Old Hall Mill, Belaugh	One of an important group of drainage mills in the Broads area and a feature in the landscape.
St Margaret's Mill, Wey Bridge, Fleggburgh	One of a significant group of drainage mills in the Broads area and a prominent feature in the landscape.
Dydall's Mill, Hoveton Marshes (Miller's Mill)	One of an important group of drainage mills in the Broads area and a prominent feature in the landscape.
Old Hall Mill, Stokesby	One of an important group of drainage mills in the Broads area and a prominent feature in the landscape.
Palmer's Mill, Upton Dyke, Upton Marshes	An unusual and important developmental stage in the history of drainage of the Broads marshes and a significant element in the landscape.
<b>River Thurne</b>	
Womack Water Drainage Mill, Ludham	The substantial remains of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Repps Drainage Mill, Repps Level, Potter	One of an important group of drainage mills in the

Heigham	Broads area and a prominent feature in the landscape.
Hickling Broad Drainage Mill, Hickling	The substantial remains of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Randall's Mill, Calthorpe	One of an important group of drainage mills in the Broads area and a feature in the landscape.
<b>River Waveney</b>	
Arnold's Mill, Oulton Marshes, Suffolk	The site of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Skepper's Mill, Oulton Dyke, Suffolk	The site of one of an important group of drainage mills in the Broads area and a feature in the landscape.
Herringfleet Marsh Mill, Somerleyton, Suffolk	One of an important group of drainage mills in the Broads area and a feature in the landscape
Somerleyton Marshes Drainage Mill, Somerleyton, Suffolk	The remains of one of an important group of drainage mills in the Broads area and a feature in the landscape
Black Mill, Wheatcare Marshes	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of the Broads area, after the wind powered drainage mills.
<b>River Yare</b>	
Buckenham Ferry Drainage Mill, Buckenham Ferry, Norfolk	The substantial remains of one of a group of drainage mills in the Broads area and a feature in the landscape
Norton Drainage Mill, Norton Marshes, Norton Subcourse	One of an important group of drainage mills in the Broads area and a feature in the landscape
Reedham Ferry Drainage Mill, (Red Mill)	One of significant group of drainage mills in the area and a prominent feature in the landscape.
North Mill, Reedham Marshes	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of the Broads area, after the wind powered drainage mills.
Reedham Diesel Engine House	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of the Broads area, after the wind powered drainage mills.
Reedham Steam Engine House	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of the Broads area, after the wind powered drainage mills.
Strumpshaw Steam Engine House	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of the Broads area, after the wind powered drainage mills.
Lambridge Steam Engine House	One of a small but important group of engine pump houses on the Broads and a significant element in the landscape. Part of the development of the drainage of

	the Broads area, after the wind powered drainage mills.
<b>River Chet</b>	
Boyce's Dyke Drainage Mill, Norton Marshes	The remains of one of a significant group of drainage mills in the Broads area and a feature in the landscape.
<b>Other structures</b>	
Smallburgh, Wayford Bridge, WW1 pill box	An important remnant of WW1 military defences
Waveney Forest, Fritton, Railway Bridge	An important example of early railway engineering.
Waveney Forest, Fritton, Firing Range	An important remnant of WW II military defences
Wayford Bridge, WW II pill box & spigot mortar emplacement	An important remnant of WW II military defences
Wayford Bridge, WW II spigot mortar emplacement	An important remnant of WW II military defences
Wayford Bridge, WW II Pill box & spigot mortar emplacement	An important remnant of WW II military defences

## APPENDIX 3

### Local List for the Broads Authority Area Consultation Responses - July 2012

Respondent	Structures consulted on	Response
Somerleyton Parish Council	Somerleyton Marsh Mill	21 days a tight consultation period. Requested that 3 buildings identified in the Somerleyton Conservation Area Appraisal be included.
Newcore Capital Management (owner)	WWII defence structure in Waveney Forest	No comment on the Local List. Noted that no public land or footpaths cross anywhere near this part of the woodland
Oulton Parish Council	Arnold's Mill, Oulton Dyke & Skepper's Mill, Oulton Marshes	Supportive of Local List designations. For information the mill on the north bank was also known locally as Palmer's Mill. Suggested adding Oulton Free Quay or Parliament Quay
Suffolk County Council	Arnold's Mill, Oulton Dyke & Skepper's Mill, Oulton Marshes	Nothing left of interest at Arnold's Mill. Some standing remains at Skepper's.
Owner	Middle Marsh Drainage Mill, Catfield Broad	Happy for its inclusion in the Local List. It was built in the first decade of the 19 <sup>th</sup> century (1800 – 1810) with the aim of draining the marshes, but soon failed and has been derelict ever since.
Owner	Lambridge Steam Engine House	Contains no working parts; chimney collapsed in 1975; lift shaft has been concreted over; new cut feeding the structure was damaged in 1962
English Heritage	General	English Heritage welcomes the preparation of local lists by Local Planning Authorities, which are important in identifying and protecting local distinctiveness. To support this process English Heritage has recently published a 'Good Practice Guide'. This document was only published in May 2012, and so was too late to support the preparation of the local list by the Broads Authority, but the author of the guidance met with the Broads Authority and provided early advice and support. English Heritage does

		not wish to comment in detail on individual properties in the list as the local authority, its residents and local amenity societies are best placed to determine what should and should not be included.
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