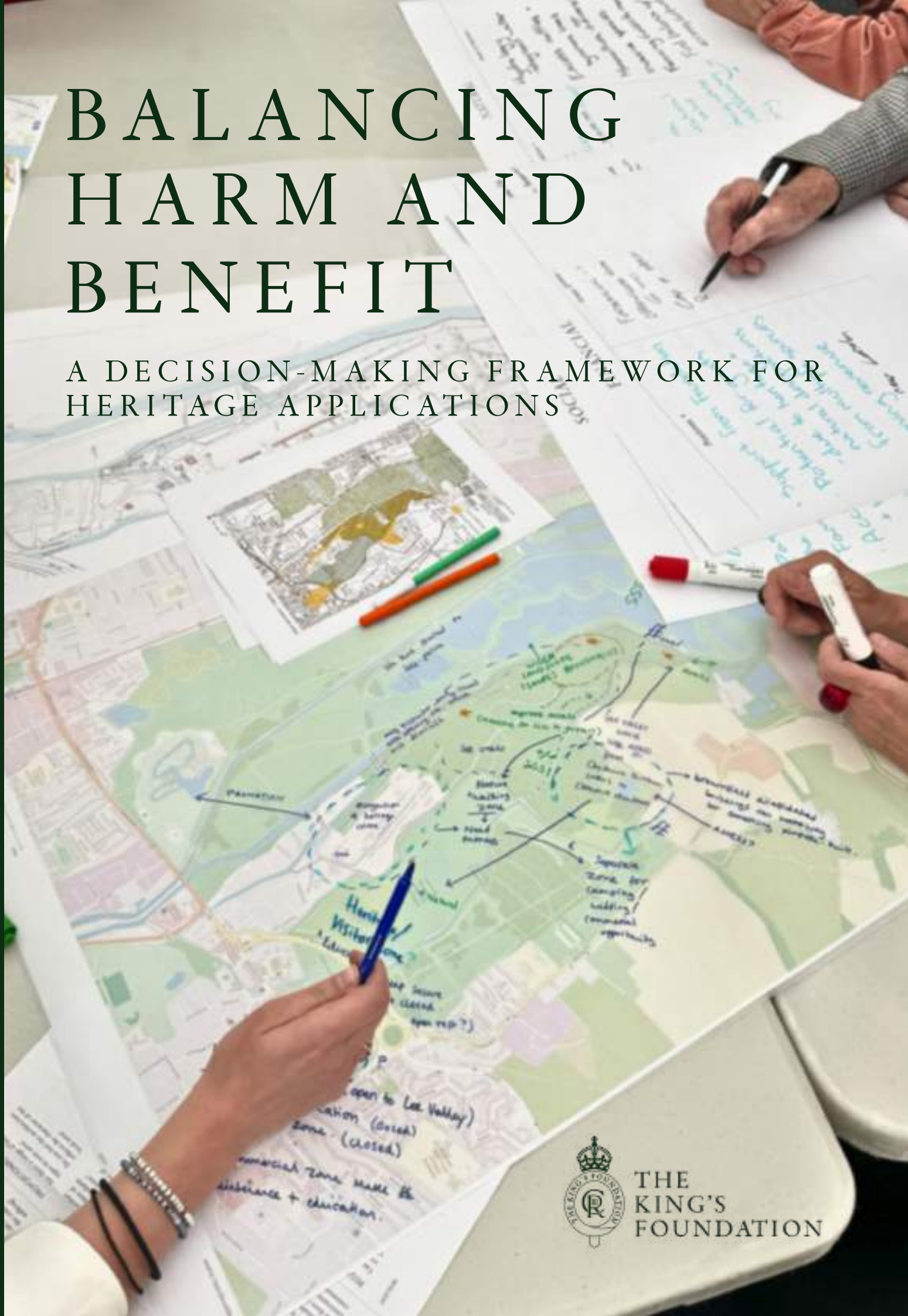
BALANCING HARM AND BENEFIT

A DECISION-MAKING FRAMEWORK FOR HERITAGE APPLICATIONS



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This report has been developed through The King's Foundation Building a Legacy work, with contributions from Ben Bolgar, Executive Director of Projects at The King's Foundation, Sarah Robinson, Associate Director at The King's Foundation, Edward Waller, Senior Conservation Advisor at The Georgian Group, and Megi Zala, Research Associate at The King's Foundation. Graphic design by Megi Zala.

FOREWORD

The stewardship of our historic buildings and places requires more than technical expertise; it requires processes that enable people to work together in pursuit of the common good. Too often, decisions affecting heritage assets are shaped through sequential consultation processes that encourage stakeholders to respond to fixed proposals from the perspective of their individual responsibilities. While this approach reflects established practice, it can inadvertently reinforce fragmentation, delay and unnecessary conflict.

This report proposes a different approach. Drawing on The King's Foundation's long-standing experience of Enquiry by Design, it demonstrates how collaborative, place-based and iterative processes can support more rigorous judgements about heritage significance, public benefit and change. By bringing together statutory consultees, local communities, technical specialists and decision-makers at the outset, it becomes possible to move beyond a reactive culture of identifying what cannot be done, towards a shared exploration of what should be done. The result is often not only better decisions, but better places: places where heritage continues to contribute to environmental stewardship, social wellbeing, economic vitality and cultural identity.

EMILY CHERRINGTON

Chief Executive Officer, The King's Foundation

Too often our heritage is viewed as a constraint rather than an opportunity to make better places and support meaningful growth. Even on major schemes, statutory consultees such as The Georgian Group are sometimes engaged only once proposals are well developed.

By contrast, the recently approved scheme for the Custom House in the City of London - one of the capital's most important Georgian buildings - is a paradigm example of early and sustained pre-application engagement and the benefits that can flow from this. Sustained discussion with the building's owner, the project architects, the local authority and fellow specialists allowed us to develop a shared understanding of the building's significance ***before*** proposals became fixed. The result is a scheme which is as beneficial in heritage terms as it is commercially exciting.

The King's Foundation's Enquiry by Design model provides an invaluable framework for stakeholder engagement and discussion on large-scale projects such as this. Having seen the virtues of this approach first-hand, we hope they will be equally apparent to readers of this timely and important publication.

ANYA LUCAS

Director, The Georgian Group

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INTRODUCTION

Planning applications affecting heritage assets, or their setting, often require decision-makers to balance potential harm to heritage significance against the public benefits of a proposal. At its simplest, the decision is concerned with the relationship between heritage significance, the nature and degree of any harm, and the public benefits that may justify change.

Public benefit should therefore be understood broadly, rather than only in narrow economic or development terms. The National Planning Policy Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies three overarching and interdependent objectives: an economic objective, a social objective and an environmental objective. The environmental objective includes protecting and enhancing the natural, built and historic environment, as well as making effective use of land, improving biodiversity, minimising waste and pollution, and mitigating and adapting to climate change.

Within this context, public benefits in heritage-related applications may include regeneration, housing delivery, community benefit, climate adaptation, environmental sustainability, long-term stewardship, or the viable reuse and conservation of the heritage asset itself. The balancing exercise is therefore not simply a choice between preservation and development. It is a judgement about whether proposed change can sustain heritage significance

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while also contributing to wider economic, social and environmental objectives. These considerations apply not only to designated heritage assets, but also to their settings, historic places, landscapes, and the wider historic environment that may be affected by development proposals. In each case, the key question is not whether change should be prevented altogether, but how change can be understood, tested and managed in a way that sustains significance while delivering legitimate public benefit.

In practice, however, decision-making within the planning system tends to operate in a sequential and reactive manner, with heritage considerations frequently addressed once development proposals have already been formulated. At this stage, consultation processes are often undertaken in disciplinary silos, with desk-based reviews carried out in isolation and on a topic-by-topic basis, rather than through a holistic and integrated assessment. As a result, heritage is often treated as a negative constraint to be mitigated through assessment and negotiation, rather than as a positive formative component shaping the early conception of development. Expert input may arrive late, when design options have already narrowed and key assumptions have become embedded. This reduces the opportunity to use specialist knowledge constructively and can lead to conflict during later planning stages.

The consequences can be significant. Projects may be delayed, redesigned or stalled. Buildings may remain empty or underused, increasing the risk of decay. Costs can rise through abortive work, extended negotiation and uncertainty. Communities may lose trust where decisions appear fragmented, opaque or disconnected from local identity and long-term stewardship. In these circumstances, the planning process can end up asking stakeholders to judge harm and benefit after positions have hardened, rather than enabling the shared exploration of options at an earlier stage.

A decision-making framework is therefore needed to support a more structured, transparent and collaborative approach. Its purpose is not to replace statutory decision-making, professional judgement or the role of the local planning authority. Rather, it provides a practical structure for understanding significance, identifying harm and benefit, testing options, clarifying trade-offs and building a shared evidence base before proposals become fixed.

Enquiry by Design (EbD) provides an important process through which this framework can be applied. Unlike a sequential consultation process, EbD is proactive, collaborative and iterative. It brings together planners, designers, communities, heritage advisers and other technical specialists at the outset of a project, allowing different forms of knowledge to be explored collectively and in parallel.

Through this process, heritage significance, setting, landscape context and place identity can inform the emerging development strategy from the earliest stages. These considerations can be tested alongside wider environmental, social, economic and technical matters, including transport, ecology, infrastructure, health, education, economic viability and long-term management. This moves the process away from a fragmented, topic-by-topic assessment and towards a more holistic understanding of place.

The value of EbD is that it allows harm, benefit and alternative options to be explored before a proposal becomes fixed. It can help identify where harm may be avoided or reduced, where significance may be sustained or enhanced, and where public benefits are strongest or weakest. It can also make trade-offs more visible, allowing stakeholders to understand not only what is being proposed, but why particular options are being pursued.

In this way, the framework supports earlier consensus, clearer reasoning and more robust decision-making. It helps move heritage from being treated as a late-stage regulatory hurdle to becoming an integral part of shaping coherent, viable and contextually grounded development proposals.

Ultimately, the framework aims to improve efficiency, quality, transparency and crobustness of early decisions affecting heritage assets, while supporting the long-term stewardship of heritage places.

The Challenge: Balancing Harm vs Benefit

Planning decisions affecting heritage assets are fundamentally concerned with balancing competing objectives. On the one hand, the planning system seeks to conserve and where appropriate, enhance the historic environment because of the value that heritage places hold for present and future generations. Increasingly, this value is also understood in environmental terms, particularly through the concept of embodied carbon, where the retention and reuse of existing buildings can significantly reduce carbon emissions compared to demolition and new construction.

This perspective is reflected in recent guidance and industry discourse, including work by Historic England, The Heritage Alliance, and wider built environment initiatives exploring circular economy approaches and the reuse of existing building stock. Reports such as Retrofit or Ruin (Grosvenor, 2025) further highlight how adaptation and reuse are being considered in relation to climate resilience and long-term building viability.
More recently, the House of Commons Culture, Media and Sport Committee's 3rd report Protecting Built Heritage (2026) recommended the adoption of a "reuse-first" approach within national housing and planning policy. It also called for planning policy and regulation to prioritise the climate adaptation and decarbonisation of historic buildings, giving greater weight to appropriate low-impact retrofit measures.
However, although these considerations are gaining prominence in professional discourse and practice, they are not yet fully embedded within national planning policy. The draft NPPF (2025) places greater emphasis on the reuse of existing buildings and energy-efficiency improvements reflecting a growing recognition of retrofit and resource efficiency within the planning system. Nevertheless, embodied carbon and whole-life carbon assessment are not yet comprehensively embedded within national decision-making requirements.

This remains an evolving area of policy, with increasing variation emerging at local authority level. Some local authorities, such as Westminster City Council, now require Whole-Life Carbon Assessments and Circular Economy Statements for certain developments as part of their planning validation process. In parallel, paragraph 167 of the existing NPPF (2024) supports planning decisions that contribute to radical reductions in greenhouse gas emissions and the transition to a low-carbon future, providing an important policy basis for considering retrofit, reuse, and carbon impacts within heritage decision-making.

On the other hand, development proposals often aim to deliver wider social, economic and environmental benefits associated with growth,


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regeneration and sustainable development. The interaction between these objectives creates a central dilemma within heritage planning: how to weigh the potential harm caused to heritage significance against the public benefits that development may deliver.

Within the English planning framework, this balance is structured through the policy guidance set out in the National Planning Policy Framework (NPPF), which requires decision-makers to assess the significance of heritage assets, identify the degree of harm arising from development proposals and evaluate whether that harm is justified by the public benefits delivered (MHCLG, 2024). This process reflects a broader understanding that heritage assets are not only cultural artefacts but also contributors to wider societal value, generating environmental, social, economic and cultural benefits through their continued use and stewardship.

In addition to the national planning policy, heritage decision-making in England is also shaped by the statutory duties established under the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 16 and 66 of the Act require decision-makers to give special regard to the desirability of preserving listed buildings, their setting and features of special architectural or historic interest, while Sections 72 places duties relating to the preservation or enhancement of conservation areas. This statutory framework underpins heritage decision-making and operates alongside the policy tests set out within the National Planning Policy Framework (NPPF). While the NPPF adopts the broader concept of "heritage significance", encompassing the multiple values attached to heritage assets, the statutory framework refers more specifically to "special architectural or historic interest". Although closely related, these terms are not entirely synonymous and reflect the evolution of heritage policy from a primarily fabric-based approach towards a wider understanding of cultural, social, environmental and experiential value.

However, determining the appropriate balance between harm and benefit is rarely straightforward. Heritage significance is inherently multi-dimensional and often difficult to quantify, while the benefits associated with development may emerge across multiple domains including community wellbeing, environmental sustainability and economic vitality. Understanding how these competing considerations interact requires a clear conceptualisation of three key elements: heritage significance, public benefit and harm. Together, these form the analytical framework through which planning decisions concerning heritage assets are evaluated.

HERITAGE SIGNIFICANCE

Within the English planning system, the concept of heritage significance provides the basis for assessing the impacts of development on the historic environment. The National Planning Policy Framework defines significance as ***"the value of a heritage asset to present and future generations because of its heritage interest"*** (MHCLG, 2024). These interests may be archaeological, architectural, artistic, or historic in nature, and significance derives not only from the physical fabric of an asset but also from its setting and its relationship to the wider historic environment.

This definition establishes significance as a relational and contextual concept rather than a fixed attribute of individual buildings. Heritage assets cannot be understood in isolation. Their meaning emerges through spatial, historical and cultural interconnections. Although Historic England's Conservation Principles (2008) predates the NPPF and uses a different value-based terminology, it remains a useful analytical framework for understanding why places matter. It identifies four interrelated categories of heritage value: evidential, historical, aesthetic and communal.

Historic England subsequently consulted on revised ***Conservation Principles*** in 2017 to align the terminology more closely with the NPPF categories of archaeological, architectural, artistic and historic interest, although this draft was not adopted as a final replacement for the 2008 document.

Within this framework, the significance of a heritage place is understood through four interrelated forms of value:

- **Evidential value** reflects the potential of a place to yield information about past human activity.
- **Historical value** derives from associations with past events, people or patterns of development.
- **Aesthetic value** relates to sensory and design qualities.
- **Communal value** captures the meanings that places hold for communities, including identity, memory and social practices.

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Together, these categories demonstrate that significance is not solely embedded in material form but also arises through interpretation and use. Mason's report on Assessing Values in Conservation Planning (2002) and Clark's book on Informed Conservation (2003) argue that heritage significance should therefore be understood as a dynamic and socially constructed process, shaped through ongoing negotiation between different stakeholders and values over time. This interpretation is particularly important in planning contexts, where competing perspectives may influence how significance is defined, prioritised and managed.

However, in planning decision-making, these values should be related back to the statutory and policy language of heritage interest: archaeological, architectural, artistic and historic. This distinction is important because it avoids conflating Historic England's broader analytical values with the NPPF terminology used in planning policy and decision-making.
Heritage significance therefore extends beyond individual buildings to encompass a wider range of heritage assets and settings, including Conservation Areas, Registered Parks and Gardens (RPGs), Scheduled Monuments, heritage landscapes, and the broader historic environment in which assets are situated. Historic England guidance emphasises that understanding significance requires analysing how physical features, spatial relationships, and cultural associations collectively contribute to the identity and meaning of a place.

This broader understanding necessarily includes the intangible dimensions of heritage. Intangible cultural heritage (ICH) refers to the practices, expressions, knowledge and skills that communities recognise as part of their cultural inheritance, including traditions, rituals, craftsmanship and social practices (Historic England, 2025; UNESCO, 2024). While planning frameworks have traditionally prioritised the protection of tangible assets, this emphasis can overlook the ways in which heritage is actively experienced, performed and sustained through everyday life. Significance can therefore be understood not only through the identification of physical heritage, but also through its embodiment in lived experience, cultural practices and social meaning. This highlights an important limitation within conventional approaches, where experiential

and relational dimensions of heritage are often insufficiently captured.
Building on this expanded understanding, the Culture and Heritage Capital (CHC) framework (DCMS, 2024; Historic England, 2024), conceptualises heritage as a form of capital generating a range of benefits across economic, social, environmental, and cultural domains. Within this framework, heritage assets are understood as stocks that generate flows of services, including experiential benefits such as aesthetic appreciation and sense of place, social benefits such as identity formation and community cohesion, capability benefits linked to learning and skills, environmental benefits associated with landscape stewardship, and functional benefits arising from the use and adaptation of historic spaces.

Taken together, these perspectives demonstrate that identifying and articulating heritage significance is not a purely descriptive exercise but a critical analytical step within the planning process. It establishes the evidential and evaluative baseline against which proposals are assessed, directly informing judgements of harm, benefit and overall planning balance. Where significance is not clearly understood or agreed at the outset, there is an increased risk of conflict, delay and redesign within the planning process. Conversely, a robust and shared understanding of significance can support more transparent, consistent and efficient decision-making, particularly within complex and multi-stakeholder contexts.

Climate change adds a further dimension to the understanding and management of heritage significance. The Climate Change Committee's "A Well-Adapted UK" report identifies cultural heritage, including buildings, sites, collections and landscapes, as already vulnerable to climate hazards such as flooding, coastal erosion and storms (CCC, 2026). These risks can affect not only the physical fabric of heritage assets, but also their accessibility, use, setting, landscape context and long-term stewardship. This reinforces the need to understand significance as something that must be actively managed over time, particularly where adaptation, reuse, repair and environmental resilience may be necessary to sustain heritage value for present and future generations.

Recent proposed reforms to the National Planning Policy Framework (NPPF) further reinforce the evolving understanding of heritage significance within planning practice. The draft revisions introduce a more explicit recognition that development proposals may result in a range of effects on heritage assets, including positive, neutral and harmful outcomes, moving beyond a predominantly harm-based framing of decision-making (MHCLG, 2025). This represents a broader approach than the conventional distinction between substantial and less than substantial harm.
This shift aligns with broader perspectives that position heritage not only as something to be protected and conserved, but also something that can be enhanced and actively contribute to regeneration, adaptation and environmental objectives.

This approach is echoed in Historic England's Strategic Plan 2026–2031, which frames heritage as a contributor to growth, place-making and sector resilience (Historic England, 2026). The strategy describes heritage as a driver of jobs, housing, tourism and investment, and states that heritage should be understood not as a barrier, but as a vehicle for sustainable development.
It also defines growth as a balance between economic development, social development and environmental protection. This reinforces the need for decision-making frameworks that can assess not only potential harm to significance, but also the ways in which heritage can support good growth, reuse, community pride, skills and long-term stewardship.

Further, the explicit recognition of the reuse of heritage assets and carbon reduction as public benefits reflects a growing integration between heritage conservation and climate agendas. At the same time, the removal of established terminology and the proposed simplification of policy

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weighting have raised concerns within the sector regarding the potential weakening of heritage protection and the balance between growth and conservation (Historic England, 2026). These developments highlight an ongoing transition within the planning system, where the concept of significance is becoming increasingly central not only to understanding heritage value, but also to structuring how that value is negotiated within wider development priorities.

HARM

The concept of harm is central to the planning balance applied to heritage assets. Within the NPPF, harm arises where development proposals negatively affect the significance of a heritage asset or the contribution made by its setting (MHCLG, 2024). The degree of harm must then be assessed in relation to the level of significance associated with the asset and weighed against the public benefits that the proposal may deliver.

Policy distinguishes between different levels of harm to heritage assets currently defined as substantial harm and less than substantial harm. Substantial harm occurs where development results in the serious loss or destruction of significance, while less than substantial harm refers to more limited impacts that nonetheless diminish heritage significance. In both cases, decision-makers must evaluate whether the public benefits associated with a proposal justify the harm identified. Draft revisions to the NPPF propose removing the term "less than substantial harm", but the requirement to assess harm and weigh it against public benefits remains unchanged.

Importantly, harm is not determined solely by physical damage to historic fabric. Changes to the setting of heritage assets, alterations to spatial relationships within historic environments or interventions that disrupt the character of heritage places may also affect significance (Historic England, 2008). Harm may therefore arise through visual intrusion, loss of contextual relationships or erosion of the cultural meanings associated with heritage places.

From a broader perspective, harm may also affect the wider systems of value associated with heritage. Where heritage places generate environmental, social, economic and cultural benefits, development impacts may reduce the capacity of those places to deliver such benefits. For example, the loss of historic landscape features may affect ecological systems, while changes to historic townscapes may undermine the identity and social meaning attached to a place.

Recognising these broader dimensions reinforces the importance of careful assessment within the planning process. Harm must therefore be understood not only as physical alteration to heritage assets but as the potential reduction in the wider values that heritage places generate for communities and environments.

PUBLIC BENEFIT

Within the planning system, the concept of public benefit provides the mechanism through which development affecting heritage assets may be justified. The NPPF requires decision-makers to weigh harm to heritage significance against the public benefits delivered by a proposal (MHCLG, 2024). These benefits may include economic growth, social wellbeing, environmental improvement or the long-term conservation of heritage assets themselves.

Historic environment guidance further recognises that heritage benefits can arise through activities such as securing the viable use of historic buildings, improving public access, enhancing understanding of significance, or supporting the long-term stewardship of heritage assets.

At the same time, the interpretation and weighting of benefits within heritage decision-making remains contested in practice. Public benefits may arise in a variety of ways. In some cases, development may enable the restoration or adaptive reuse of heritage assets that might otherwise deteriorate, securing their long-term viability. In other cases, development may generate wider societal gains, such as improved public spaces and/or access, enhanced environmental performance or new economic opportunities.

The conservation and sustainable reuse of historic buildings, for example, can support climate objectives by reducing embodied carbon while contributing to local economic vitality and place identity.

Recent research has emphasised that the value generated by heritage places extends far beyond their physical preservation. The Culture and Heritage Capital framework developed by Historic England conceptualises heritage assets as stocks of cultural capital that generate flows of services through interactions between people and places (DCMS, 2024).
These services include:

- **experiential benefits,** such as emotional responses to heritage places
- identity services that **reinforce community belonging and collective memory**
- capability services associated with **learning and skill development**
- **environmental services** linked to ecological systems
- functional services associated with the **practical use of heritage spaces**

Building on these insights, the benefits associated with heritage places can be understood across several interrelated dimensions. Environmental benefits may arise through the stewardship of historic landscapes and the ecological functions embedded within traditional land-use patterns. Social benefits may emerge through the role of heritage places in supporting community identity, social cohesion and wellbeing (Reilly et al., 2018; Gallou, 2022). Economic benefits may arise through heritage-led regeneration, tourism and investment in historic environments. Cultural benefits may derive from the role of heritage in shaping place identity, architectural character and a sense of continuity between past and present.

Research into heritage engagement has also highlighted the concept of heritage connectedness (National Trust & University of Derby, 2025), which describes the relationships individuals form with heritage through knowledge, emotional attachment and participation. Studies suggest that stronger connections to heritage are associated with increased wellbeing, life satisfaction and pro-environmental behaviour (Richardson et al., 2025). Complementary evidence also shows that heritage environments themselves can generate wellbeing benefits through direct experience, with visits to historic sites associated with increased positive affect and reduced anxiety as a result of their restorative qualities (Gallou et al., 2022).

Taken together, these perspectives demonstrate that heritage value is not solely embedded in the physical fabric of assets, but is produced through ongoing interactions between people, place and environment. Understanding public benefits in these broader terms reframes heritage conservation from being perceived as a constraint within development processes to being recognised as a contributor to wider societal outcomes. Heritage places therefore function as generators of environmental, social, economic and cultural value within the broader system of sustainable development.

Why the System Gets Stuck

The persistence of inefficiencies within the planning and development process can be understood as a systemic condition rather than a series of isolated failures. Nowhere is this more evident than in the adaptation and management of historic buildings, where decision-making must reconcile multiple, often competing priorities within a highly structured regulatory framework.

Decisions concerning historic assets involve the interaction of numerous actors each contributing distinct forms of expertise (through different subject lenses) to the understanding of significance, the assessment of change, and the articulation of public benefit. However, these contributions are rarely brought together through a shared process. Instead, they are typically shaped by institutional arrangements that encourage fragmented, sequential, and reactive forms of engagement, limiting the potential for early alignment and collective problem-solving (Healey, 1997; Geels, 2011).

Within heritage applications, this manifests through several recurring conditions. The assessment of change is not purely technical, but interpretative, requiring judgement, negotiation, and the balancing of values that are often in tension. Yet the processes through which these decisions are made remain poorly configured to support such complexity.

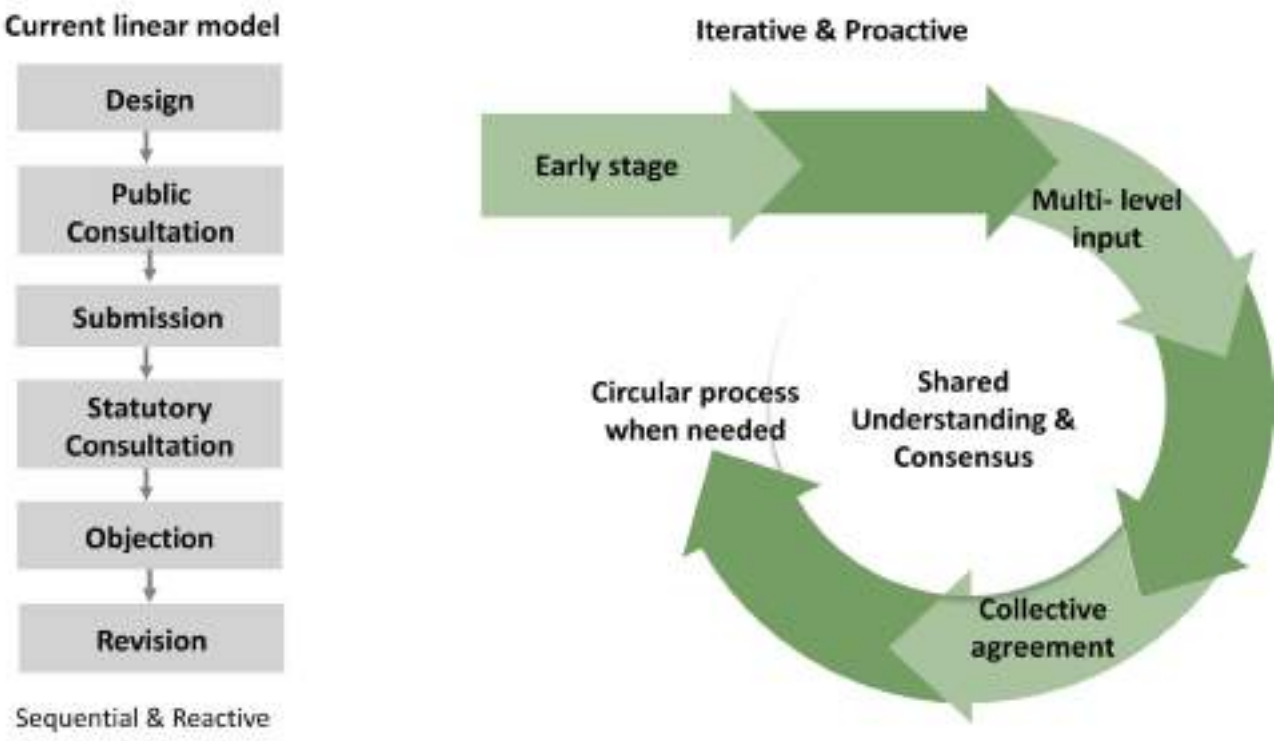
SEQUENTIAL DECISION-MAKING IN AN INHERENTLY ITERATIVE PROCESS

Although the assessment of heritage proposals requires iterative judgement (particularly in balancing harm against evolving public benefits), the process is typically structured as a linear sequence of stages. Design development often precedes meaningful engagement with consultees, leading to situations where key issues are identified only at later stages. This creates a misalignment between how decisions need to be made (iteratively, through ongoing evaluation and dialogue) contributing to delay and revisions (RTPI, 2023).

Research on participatory heritage projects reinforces this, showing that decision-making depends on interaction between multiple actors and the negotiation of values, rather than fixed early-stage judgements (Foroughi et al., 2023). As a result, heritage decision-making cannot be understood as a linear sequence of steps, but as a process that evolves through dialogue, interpretation, and iterative refinement.

FRAGMENTED EXPERTISE AND DISJOINTED INTERPRETATION OF SIGNIFICANCE

Heritage decision-making requires the integration



of multiple forms of expertise, particularly in understanding significance and assessing the impact of change. As highlighted in the Custom House case study introduced below, statutory consultees play a key role in interrogating proposals to ensure that significance is properly understood and agreed upon.

Yet in practice, these actors often operate without a shared analytical framework and in isolation, resulting in divergent interpretations of harm and benefit. This reflects broader critiques of fragmented knowledge systems within planning practice (Healey, 1997).

LACK OF A SHARED BASELINE UNDERSTANDING OF SIGNIFICANCE AND VALUE

The balancing of harm and public benefit is fundamentally dependent on a common understanding of what is significant and why. Without this, the assessment becomes unstable and open to interpretation. In many cases, this shared understanding is not established early, requiring stakeholders to retrospectively align positions through technical documentation and consultation processes.

LATE ENGAGEMENT AND REACTIVE FEEDBACK LOOPS

Engagement with key stakeholders (particularly statutory consultees and local authorities) often occurs at formal consultation stages, when proposals may already be relatively advanced. In such circumstances, feedback is more likely to be reactive and risk-averse and opportunities for iterative refinement can be more limited, particularly in sensitive heritage contexts where the assessment of harm requires careful negotiation, as significant time, cost and design investment may already have been committed. By contrast, early meaningful engagement allows stakeholders to collectively explore options, refine proposals, and establish a shared understanding of constraints and opportunities at the outset of the process, rather than contested at a later stage.

PREMATURE DESIGN FIXATION AND REDUCED FLEXIBILITY

Design research emphasises that problems and solutions evolve together, requiring iterative exploration rather than fixed early decisions (Lawson, 2005). However, where early design concepts become stabilised, this can constrain further exploration and limit adaptability (Cross, 2011). In development practice, this tendency is reinforced by viability modelling, programme pressures, and internal design progression, which encourage teams to advance proposals prior to meaningful external engagement.

Within heritage decision-making, this dynamic is particularly problematic. The assessment of significance and harm is inherently interpretative and negotiated, requiring iterative dialogue between stakeholders. However, once proposals are well-developed, engagement shifts from exploration to justification, reducing the scope for refinement and increasing resistance to change. This reflects wider critiques of planning processes as reactive rather than iterative, limiting their capacity to accommodate complexity (RTPI, 2023).

Similarly, national design guidance emphasises the importance of early-stage iteration and option testing to achieve high-quality outcomes (DLUHC, 2021), while heritage guidance highlights that managing change requires ongoing assessment and refinement rather than fixed solutions (Historic England, 2008).

The implications are significant. Fixing the design prematurely limits the exploration of alternative solutions that could reduce impacts on heritage significance, as well as the ability to introduce effective mitigation measures at an early stage. Historic England guidance indicates that opportunities to minimise harm are most effective when considered early in the design process and through iterative refinement of proposals (Historic England, 2017). Where this process is constrained, the ability to avoid or reduce harm is correspondingly diminished, increasing the likelihood of conflict, delay, and the need for redesign. This has particular relevance in light of the evolving direction of national planning policy, as reflected in the 2025 NPPF consultation, which places greater emphasis on achieving balanced and sustainable outcomes, including through the reuse and adaptation of existing assets (MHCLG, 2025).

Within this context, the extent of harm is not simply an inherent property of a proposal but is shaped through the design process itself. Premature design fixation therefore constrains the ability to respond proportionately to heritage significance, limiting opportunities to reduce harm, enhance public benefit, and respond to stakeholder input. As such, maintaining flexibility in early design stages is a critical condition for effective heritage decision-making, enabling iterative testing, shared understanding, and more proportionate outcomes.

CAPACITY CONSTRAINTS WITHIN LOCAL AUTHORITIES AND CONSULTEES

The ability of planning authorities and statutory consultees to engage proactively in heritage decision-making is increasingly constrained by structural capacity limitations, including staff shortages, skills gaps, and long-term under-resourcing. Government survey evidence shows that recruitment difficulties remain widespread across English local planning authorities, with 79% reporting recruitment problems and 93% reporting skills gaps in 2025, affecting service delivery and preparedness for reform (MHCLG, 2025). The earlier national survey similarly found persistent challenges in recruitment, retention and skills across local authority planning teams (MHCLG, 2025a).

These findings are reinforced by RTPI evidence showing that most responding planning authorities had 1 to 3 vacancies, with recruitment pressures particularly acute in mid-to-senior planning roles (RTPI, 2025).

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Within the heritage field, the problem is more acute because specialist conservation and archaeology expertise is limited and has continued to decline. Historic England's 2024 survey found that local authorities in England had around 765.78 FTE staff working on heritage issues, down 5% from 2023 and 8% since 2022; it also records a longer-term decline, noting that between 2006 and 2018 the number of conservation specialists advising local authorities fell by 35%, with an equivalent decline in archaeological specialists (Historic England, 2025; Historic England, 2023). This sustained reduction in specialist capacity was already reflected in 2018, when 21% of local authorities were reported to have no dedicated conservation officer, a finding subsequently highlighted by RICS (Civic Voice, 2018; Fairbairn, 2019).

Historic England has also linked these shortages to growing and more complex workloads, particularly around retrofit and energy efficiency, and has argued that more funding is needed both to recruit staff and to upskill the existing workforce (Historic England, 2025a). In parallel, heritage-sector commentary has drawn attention to the shrinking recruitment pipeline for conservation officers and the practical consequences this creates for work capacity in local government (Victorian Society, 2025).

The implications for heritage decision-making are significant. Where local authority and consultee capacity is stretched, engagement is more likely to become time-limited and reactive, reducing the opportunity for early collaboration, iterative testing, and shared problem-solving. Historic England's recent research on planning challenges similarly identifies under-resourcing among local authorities and consultees as a factor affecting decision times (Historic England, 2025b). As a result, capacity constraints are not simply an operational issue but a structural condition that shapes how decisions are made, contributing directly to fragmentation, delay, and risk-aversion within the heritage planning process.

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Implications for Decision-Making

Taken together, these conditions produce a decision-making environment in which the balancing of harm and public benefit is often undertaken under constrained and fragmented conditions. Rather than emerging through shared understanding and iterative testing, decisions are frequently shaped by late-stage negotiation, misaligned expectations, and limited institutional capacity.

The assessment process itself is also divided across different areas of expertise. Heritage harm is typically assessed by Conservation Officers with specialist input from National Amenity Societies and Statutory Consultees. These actors may also identify heritage-related benefits, such as repair, conservation, enhancement, improved setting, or long-term stewardship.

Wider public benefits, including economic, housing, regeneration, environmental or community benefits, are usually assessed through the broader planning case by Planning Officers and relevant consultees. The overall balancing exercise, however, rests with the local planning authority as decision-maker, which must assign weight to both heritage harms and public benefits within the relevant policy and legislative framework.

This can become particularly complex where applications are referred to planning committee. At this stage, the process may effectively be reopened, with elected members required to weigh technical heritage advice, planning policy, public representations and wider political considerations.

Where committee members have limited familiarity with heritage legislation or planning policy, there is a risk that decisions, including reasons for refusal, may not be fully grounded in the relevant policy and legal framework. This can contribute to uncertainty, delay and a higher likelihood of appeal.

For this reason, in-person and collaborative engagement is particularly important. Although it may appear resource-intensive at the outset, it can help clarify the nature of harm, distinguish between heritage benefits and wider public benefits, and establish a shared understanding of how these matters may be weighed.

Such engagement can enable earlier consensus on the direction of travel, support shared understanding between stakeholders, and reduce the likelihood of late-stage conflict, thereby improving the efficiency and coherence of the formal decision-making process.

The Need for an Integrated Decision-Making Framework

The preceding sections demonstrate that the balance between heritage harm and public benefit is rarely straightforward. It depends on a clear understanding of significance, a proportionate assessment of harm, and a careful articulation of the public benefits that may justify change. In practice, however, these elements are often considered through separate processes, by different actors, and at different stages of the planning and design process.

This creates a need for a more integrated decision-making framework capable of bringing these considerations together within a single, coherent process. Rather than treating significance, harm and public benefit as separate exercises, the framework enables them to be considered collectively, supporting a more transparent understanding of how decisions are reached.

An integrated framework can help clarify what is significant and why, where harm may arise, what opportunities exist to avoid or reduce that harm, and how public benefits should be understood in relation to sustainable development. It can also make trade-offs more visible, allowing heritage advisers, planning officers, applicants, communities and decision-makers to work from a more transparent, holistic and shared baseline.

This is particularly important in complex heritage contexts, where significance may be layered, impacts may be uncertain, and public benefits may extend across economic, social, environmental and cultural dimensions. Without an agreed structure for considering these issues together, the planning process can become reactive, fragmented and vulnerable to delay or conflict.

The framework proposed in this report responds to this challenge by supporting a more collaborative, iterative and evidence-led approach to decision-making. It provides a practical structure for moving from understanding significance, to identifying constraints and opportunities, testing options, appraising harm and benefit, and refining a deliverable direction of travel. Its purpose is to improve the clarity, consistency and robustness of decisions affecting heritage assets, while supporting better outcomes for places, communities and long-term stewardship.

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The Decision-Making Framework Outline

PURPOSE OF THE FRAMEWORK

Conventional planning processes are typically structured as a sequence of discrete stages, progressing from design development through consultation, statutory review and formal decision-making. While this model provides procedural clarity, it is often poorly aligned with the nature of design and heritage decision-making, which is inherently interpretative, multi-dimensional and iterative.

The assessment of proposals affecting heritage assets requires the continuous balancing of significance, harm and public benefit, often in the presence of uncertainty, competing values and incomplete information. These judgements cannot always be fixed at a single point in time. They evolve through dialogue, testing, refinement and the gradual development of a shared understanding between applicants, design teams, heritage advisers, planning officers, consultees, communities and decision-makers.

In practice, however, these issues are often considered only after proposals have already been substantially developed. This limits opportunities for meaningful iteration and can increase the likelihood of conflict, delay or redesign. It also means that heritage concerns may be framed reactively, as constraints to be resolved, rather than as formative considerations capable of shaping the direction of change from the outset. This misalignment reflects a broader structural issue: decision-making is often organised sequentially, while the problems it seeks to resolve are inherently iterative. In response, this report proposes a decision-making framework that reconfigures the process as a continuous loop of understanding, testing, appraisal and refinement.

The purpose of the framework is not to replace statutory decision-making, professional judgement or the role of the local planning authority. Nor does it remove the need for formal heritage assessment, planning policy compliance or the application of statutory duties. Rather, it provides a structured way of bringing evidence, expertise and stakeholder perspectives together at an earlier stage, before proposals become fixed and positions become entrenched.

THE FRAMEWORK IS INTENDED TO SUPPORT:

- A shared understanding of heritage significance, constraints and opportunities.
- Earlier identification of potential harm and public benefit.
- Collaborative holistic testing of alternative options.
- Clearer articulation of trade-offs.
- More transparent and proportionate decision-making.
- Improved alignment between conservation, viability, design quality and long-term stewardship.

IT COMBINES TWO COMPLEMENTARY COMPONENTS:

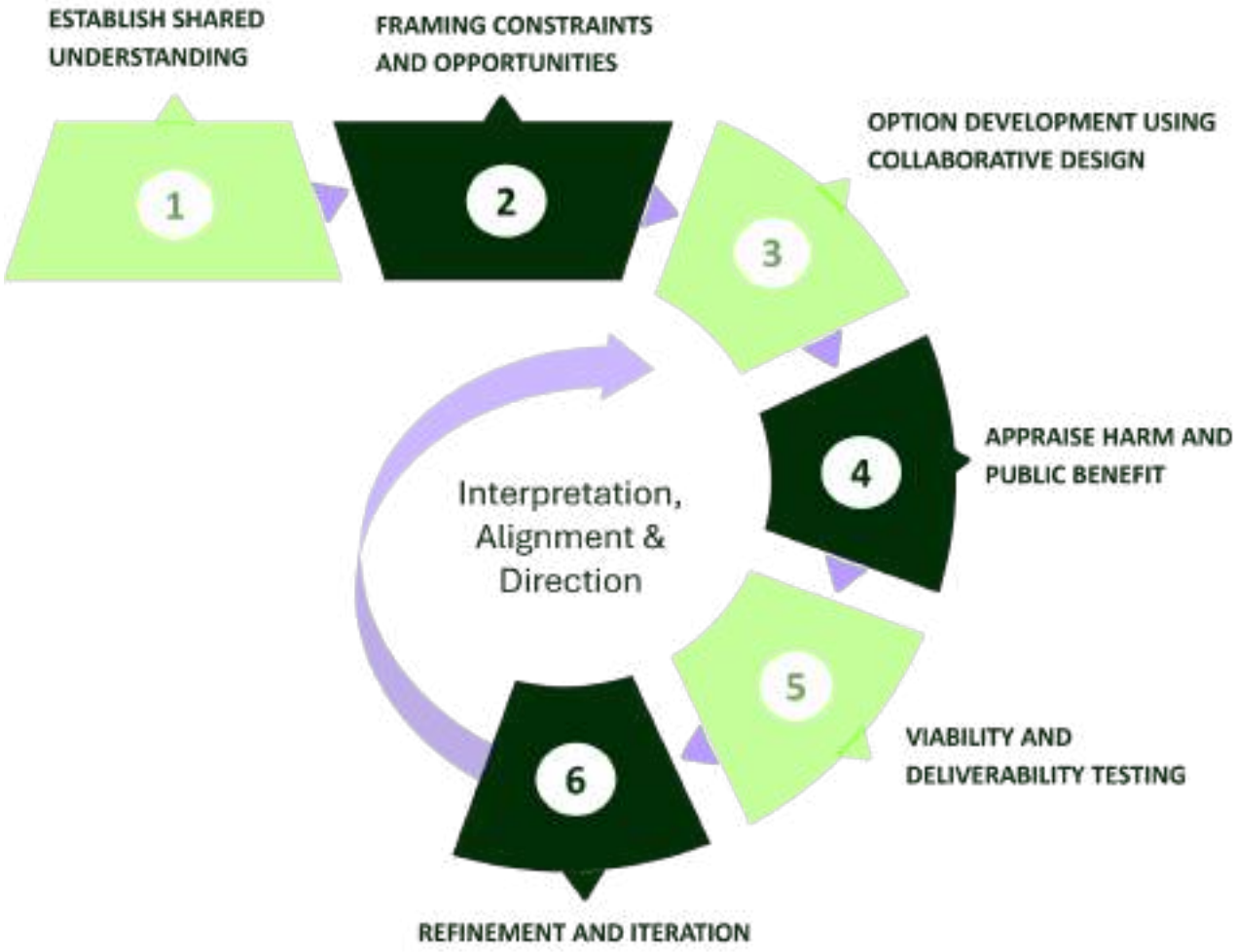
A process layer, structured through *Enquiry by Design*, which guides how decisions are developed through collaborative and iterative engagement.

An appraisal layer, structured through the *Community and Heritage Capital Assessment*, which helps assess and interpret significance, harm, public benefit and wider place-based value through a heritage lens.

Together, these provide a coherent basis for both shaping and appraising proposals, supporting a more transparent, collaborative and adaptive approach to heritage decision-making.

THE FRAMEWORK OUTLINE

The framework is organised as a continuous loop consisting of six interrelated components:



These components do not operate as fixed stages. They form an iterative cycle, allowing proposals to be revisited and adapted as new information, constraints or opportunities emerge.

At the centre of the framework lies the establishment of a shared understanding. This shared baseline enables alignment between stakeholders on the interpretation of significance, the nature of constraints, areas of uncertainty and the broad direction of travel for the project. Without this shared baseline, later judgements about harm, benefit and viability are more likely to become fragmented, contested or reactive.

The framework is therefore not a linear checklist. It is a structured way of working through complexity. It enables stakeholders to move between understanding, testing, appraising and refining proposals, while keeping the balance between heritage significance, potential harm and public benefit visible throughout the process.

THIS FRAMEWORK IS PARTICULARLY USEFUL IN COMPLEX HERITAGE CONTEXTS WHERE:

- Significance is layered or contested.
- Different parts of an asset or place have different capacities for change.
- Public benefit includes both heritage and non-heritage benefits.
- Viability and long-term stewardship are central to the future of the site.
- Multiple consultees, advisers and community groups hold different perspectives.
- The proposal may need to evolve through testing rather than proceed from a fixed initial design.

In these contexts, the framework helps shift the process from late-stage negotiation towards earlier shared exploration. It supports a more proactive approach, where heritage significance is not simply defended at the end of the process, but actively informs the shaping of options from the beginning.

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PROCESS LAYER: ENQUIRY BY DESIGN

Enquiry by Design functions as the process engine and methodology of the framework. It structures how decisions are developed through collaborative, interdisciplinary engagement. Rather than functioning as a separate stage, Enquiry by Design underpins the framework as a continuous mode of working, particularly in the formative phases where key decisions are shaped.

At its core, *Enquiry by Design* shifts the consultation process from a sequential and reactive model to one that is interactive, iterative and solution-oriented. Rather than presenting fixed proposals for consultation, it enables stakeholders to participate in shaping the direction of change from the outset.

In the context of this framework, *Enquiry by Design* operates primarily across the early and most uncertain stages of the process, including:

- establishing baseline understanding
- framing constraints and opportunities
- developing options
- testing alternatives
- building consensus around a broad direction of travel

The process typically brings together:

- planners, architects, urban designers and other built environment professionals
- landowners, developers and clients
- local authorities and statutory bodies
- community representatives and local groups
- technical experts, including heritage, archaeology, ecology, highways, infrastructure, viability and landscape specialists.

LISTEN
information gathering

DIAGNOSE
shared analysis

REMEDY
develop possible solutions and options

TEST
confirm viability

The process begins with the collection and sharing of baseline information. This may include technical briefings, stakeholder inputs, site visits and walkarounds. Technical briefings play a particularly important role because they bring together specialist inputs on issues such as planning policy, heritage significance, archaeology, ecology, transport, infrastructure, viability, sustainability and cultural context.
By presenting this information collectively, rather than in isolation, the process supports a more integrated understanding of how different factors interrelate and influence the development potential of a site.
Alongside structured inputs, the process also creates space for informal and intangible forms of engagement. Discussions during site visits, walkarounds, breaks or small group conversations can reveal underlying concerns, sensitivities, emerging ideas or areas of potential agreement that may not surface in formal sessions. In this sense, listening is not a single stage, but an active and continuous process.

The diagnostic phase involves collective interpretation of the evidence. Stakeholders work together to identify constraints, opportunities, interdependencies and potential areas of conflict. This stage transforms raw information into shared insight.
The Community & Heritage Capital Assessment can support this stage by providing a structured lens through which the place is analysed across natural, built, social, financial and heritage/cultural dimensions. This helps ensure that discussions are holistic rather than fragmented, capturing both qualitative and quantitative dimensions of place.
The role of facilitation is important here. The facilitator helps synthesise diverse inputs, ensure that different perspectives are acknowledged, and support the group in moving from separate positions towards a shared analytical baseline.

Building on this shared understanding, stakeholders begin to generate spatial options and test alternative scenarios. This may involve **sketching, mapping, grouping ideas, testing levels of intervention, exploring phasing strategies** or **considering different uses.**

The purpose is not to arrive immediately at a final proposal, but to explore what change could look like and how different options may affect heritage significance, public benefit, viability and deliverability.

Emerging options are then tested against technical constraints, policy requirements, stakeholder feedback and economic viability. Specialists contribute detailed input to check whether ideas are not only desirable, but also deliverable and robust.
The process remains iterative. If issues arise, options can return to earlier stages for further refinement. In this way, the emerging proposal is treated as a working hypothesis, refined through evidence, discussion and testing until a clearer direction of travel can be identified.

This process layer is central to the framework because it creates the conditions for better decision-making. It enables stakeholders to explore uncertainty before proposals become fixed, to identify harm and benefit earlier, and to develop options that are more likely to be coherent, deliverable and capable of securing wider support.

APPRAISAL LAYER: COMMUNITY AND HERITAGE CAPITAL ASSESSMENT

While Enquiry by Design structures how decisions are developed, the framework also requires a clear and consistent basis for appraising those decisions. This is provided through the Community and Heritage Capital Assessment.

The assessment helps structure discussion across a range of interconnected dimensions, including:

- **Natural capital:** landscape, ecology, environmental systems, biodiversity, water, climate resilience and resource sustainability.
- **Built capital**: buildings, infrastructure, urban form, connectivity, physical character, adaptability and performance.
- **Social capital**: community networks, identity, access, inclusion, wellbeing, participation and local trust.
- **Financial capital:** viability, investment, economic activity, funding, delivery capacity and long-term maintenance.
- **Heritage and cultural capital**: significance, historic fabric, setting, memory, identity, craftsmanship, cultural practices, interpretation and long-term stewardship.

This appraisal layer is not intended to produce a single numerical score or substitute for professional judgement. Instead, it provides a structured way of identifying constraints, opportunities, interdependencies and trade-offs before proposals become fixed.

In heritage contexts, this is particularly important because public benefit is rarely confined to one category. Benefits may include economic regeneration, improved public access, environmental performance, cultural interpretation, community identity, continued use, repair, conservation, enhancement or long-term stewardship. Equally, harm may not be limited to physical fabric; it may affect setting, spatial relationships, patterns of use, social meaning or the capacity of a place to continue generating value over time.

The Community and Heritage Capital Assessment therefore helps make different forms of value more visible. It allows stakeholders to consider how proposals perform across multiple dimensions and to understand where trade-offs may arise.

For example, an option may deliver strong financial viability but create greater harm to heritage significance; another may better sustain significance but require a different delivery model or funding route. Making these relationships visible enables more transparent discussion and more proportionate judgement.

In this adapted form, heritage and culture should not be treated as a narrow or isolated category. They are both a specific dimension of assessment and a cross-cutting consideration that informs the natural, built, social and financial dimensions. This reflects the understanding that heritage is not only a physical asset, but also a source of cultural, social, environmental and economic value.

The appraisal layer supports the framework by helping stakeholders consider:

- ◊ Establish shared understanding
- ◊ Framing constraints and opportunities
- ◊ Option development using collaborative design
- ◊ Appraisal of harm and public benefit
- ◊ Viability and deliverability testing
- ◊ Refinement and iteration

It therefore provides a bridge between collaborative design exploration and the formal planning balance. It helps ensure that emerging proposals are not only shaped creatively, but also appraised clearly in relation to heritage significance, harm and public benefit, using the Community and Heritage Capital Assessment table in Appendix (page 70).

Stages of the Framework

STAGE 1
ESTABLISH SHARED UNDERSTANDING

The first stage establishes a clear starting point based on evidence. It is delivered through the early phases of the process, combining formal technical inputs with on-site and interactive engagement.

The aim is to ensure that all participants are working from a common evidence base before options are developed. This does not mean that all issues will be resolved at the outset. Rather, it means that the main known facts, uncertainties, constraints and ambitions are made explicit.

This stage is primarily concerned with gathering, sharing and organising information. Interpretation and prioritisation take place in Stage 2. It typically includes four areas of understanding.

This stage is important because later judgements about harm and public benefit depend on the quality of the shared baseline. Where significance, constraints or project drivers are not clearly understood, later assessment becomes unstable and more vulnerable to disagreement.

SITE AND ASSET

CONTEXT AND EVIDENCE

CONSTRAINTS AND POTENTIAL

PROJECT DRIVERS

- ◊ the heritage significance of the asset or place
- ◊ physical condition
- ◊ its setting
- ◊ its relationship to the wider historic environment
- ◊ known sensitivities
- ◊ current use, ownership or management context, where relevant

It should identify what is currently known about the asset or place, including why it may be significant and what evidence supports that understanding.

- ◊ planning and policy framework
- ◊ existing information / evidence base (including surveys, heritage assessments, condition reports, ecological information, transport or infrastructure studies, viability evidence and other relevant data)
- ◊ relevant statutory, environmental, technical or operational constraints
- ◊ information gaps or areas where further assessment is required

This ensures that the process begins from a shared understanding of the available evidence, rather than from separate or partial interpretations.

- ◊ known constraints affecting the asset or place but also capacity for change
- ◊ known opportunities (relating to use, access, setting, wider context or future management)
- ◊ areas of uncertainty that require further testing

At this stage, constraints and opportunities are recorded rather than fully resolved. Their implications for change are considered in Stage 2.

- ◊ stakeholder objectives
- ◊ client brief / ambition (where defined)
- ◊ community priorities
- ◊ potential future uses
- ◊ long-term stewardship requirements and delivery considerations

Where a client brief already exists, it should be tested against the evidence base in later stages rather than treated as fixed

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KEY CONSIDERATIONS

- ◊ What do we already know about the site, asset and wider context?
- ◊ What evidence is available, and what is missing?
- ◊ What is fixed, and what may still be flexible?
- ◊ What assumptions need to be tested?
- ◊ Where are the key risks or uncertainties at this stage?

EXPECTED OUTCOME

- ◊ Shared baseline of evidence
- ◊ Agreed summary of significance and key sensitivities
- ◊ Initial understanding of what is fixed and what is flexible.
- ◊ Agreed set of constraints and opportunities
- ◊ A record of stakeholder objectives
- ◊ List of information gaps and uncertainties (to be resolved)

STAGE 2
FRAME CONSTRAINTS, OPPORTUNITIES AND PRIORITIES

Building on the evidence base established in Stage 1, this stage is delivered through facilitated workshops and collaborative discussion. It forms the diagnostic stage of the framework, where stakeholders work together to interpret information, identify priorities and establish a common analytical baseline for decision-making.

At this point, the Community and Heritage Capital Assessment can be applied to structure the analysis of the site or asset across natural, built, social, financial and heritage/cultural dimensions. This provides a systematic way of identifying constraints, opportunities and interdependencies before options are developed. The purpose of this stage is to move from evidence to shared interpretation. It asks what the information gathered in Stage 1 means for future change, where the main sensitivities lie, where opportunities may exist, and which issues need to shape option development.

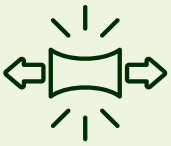
Heritage, ecology, transport, viability, access, use, community value and long-term management should not be treated as isolated topics. They need to be understood in relation to one another.

This stage establishes the analytical foundation for the framework. By structuring understanding before design begins, it ensures that option development is grounded in a shared and holistic interpretation of place, rather than fragmented or discipline-specific perspectives.

UNDERSTANDING SIGNIFICANCE AND CONSTRAINTS

ALIGNING PRIORITIES

IDENTIFYING TENSIONS EARLY



- ◊ What is significant and why (including less visible or intangible aspects)?
- ◊ Which elements, qualities, relationships and settings are most sensitive to change, and where there may be capacity for carefully managed adaptation without undermining significance?
- ◊ What forms of change could sustain, reveal or enhance significance, rather than simply avoiding harm?
- ◊ What are the key risks if change is not appropriately understood, tested and managed?

This wording is important because conservation is not the prevention of change. It is the management of change in a way that sustains, and where appropriate enhances significance.

- ◊ stakeholder objectives and expectations
- ◊ client brief or ambition (tested against site realities)
- ◊ planning and policy expectations
- ◊ conservation priorities
- ◊ environmental and sustainability objectives
- ◊ community needs and public access
- ◊ long-term viability and management requirements

This involves testing different expectations and ambitions against the evidence base.

The aim is to identify where objectives align, where they diverge, and where further work is needed.

- ◊ Where objectives may conflict (e.g. viability vs conservation, access vs protection)
- ◊ Areas of uncertainty or incomplete information
- ◊ Dependencies that may influence future decisions
- ◊ Commercial use and community benefit
- ◊ Short-term cost and long-term stewardship

This involves making potential conflicts visible before design options become fixed.

This stage is often supported by structured tools such as matrix mapping, SWOT-style exercises, constraints plans or capital-based assessment tables. These tools help ensure that qualitative and quantitative inputs are considered together, rather than being left in separate professional silos.

WORKING APPROACH

- ◊ Structured workshop/roundtable discussion
- ◊ Use of drawings, plans, precedent or evidence where helpful
- ◊ Use of the CHCA, and/ or SWOT exercise
- ◊ Open discussion to test assumptions and surface differences
- ◊ Collaborative identification of constraints, opportunities, tensions and interdependencies

EXPECTED OUTCOME

- ◊ Shared understanding of the site, asset and its potential
- ◊ Agreed priorities and key issues to inform option development
- ◊ Early identification of risks, tensions and unknowns
- ◊ Clear basis for option development (Stage 3)

STAGE 3
IDENTIFY POTENTIAL CHANGE
DEVELOP OPTIONS THROUGH COLLABORATIVE DESIGN

This stage moves from diagnosis to option development. Its purpose is to explore what change could look like before any one option becomes fixed.

While the Community and Heritage Capital Assessment is primarily used to structure early understanding, it continues to inform discussions during option development. It helps stakeholders test trade-offs and understand how different proposals may perform across multiple dimensions of value.

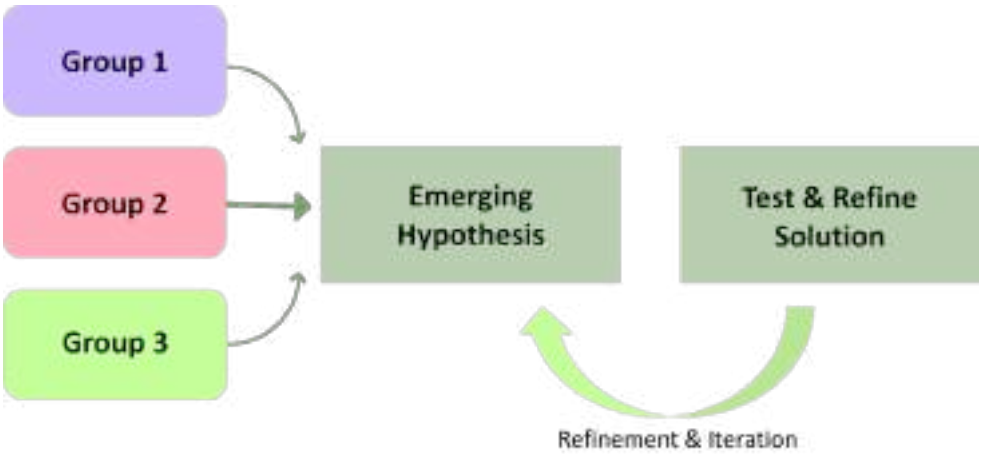
Options should be developed collaboratively and spatially, using drawing, mapping, discussion and technical input. This is where the Enquiry by Design process is especially valuable, because it allows stakeholders to visualise, test and refine possible responses together.

This stage may involve:

- ◊ generating spatial options or development scenarios
- ◊ testing different levels of intervention
- ◊ exploring alternative uses
- ◊ identifying opportunities to avoid or reduce harm
- ◊ considering how significance may be sustained, revealed or enhanced
- ◊ testing relationships between heritage, ecology, access, movement, use, servicing and viability
- ◊ exploring phasing, management and delivery implications

Defining the direction of change by addressing key questions:

- ◊ What is the proposed future use?
- ◊ What level of intervention might be required?
- ◊ What benefits could the project deliver?
- ◊ How is heritage safeguarded, including tangible and intangible aspects?
- ◊ How can the asset or place be made viable and sustainable for the future?
- ◊ How is long-term maintenance and management addressed?
- ◊ How is value for the client embedded?
- ◊ What assumptions, dependencies or risks may influence delivery?



EbD working group and hypothesis method.

The purpose is not to produce a final scheme immediately. Instead, this stage creates a set of informed options or working hypotheses that can be appraised and refined. It allows stakeholders to compare different approaches before significant investment is made in one fixed design direction.

This stage is particularly important in heritage contexts because the level of harm is often shaped by design choices. Harm is not always an unavoidable consequence of change; it may be reduced, avoided or transformed through better siting, massing, use, phasing, access strategy, servicing approach, interpretation or management.

EXPECTED OUTCOME

- A series of spatial options or scenarios
- Emerging design principles
- A record of options considered
- Initial assessment of strengths, weaknesses and trade-offs
- Identification of options that should be taken forward, revised or discarded

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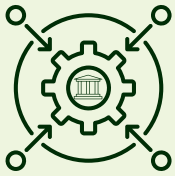
STAGE 4
APPRAISE HARM AND PUBLIC BENEFIT

This stage provides a structured appraisal of the emerging options. The term appraisal is used deliberately, rather than final evaluation, because the detailed design may still be evolving and the precise level of harm may not yet be fully determined.

The purpose of this stage is to compare options in a simple and proportionate way, identify key trade-offs, and support further refinement before a preferred direction is taken forward. It does not replace formal heritage assessment, statutory decision-making or the final planning balance. Rather, it helps stakeholders understand how each option may affect heritage significance, what public benefits it may deliver, and where further design development is needed.

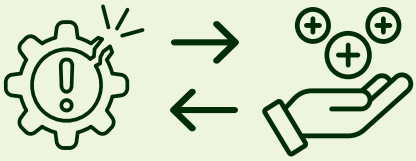
The appraisal should address three main questions for each design option.

WHAT IS THE IMPACT ON HERITAGE SIGNIFICANCE?



WHAT PUBLIC BENEFITS MAY ARISE?

HOW DO HARM AND PUBLIC BENEFIT RELATE TO ONE ANOTHER?



- What level of harm, if any, may arise to the significance of the heritage asset?
- Which aspects of significance may be affected, including fabric, setting, character, appearance, spatial relationships, use, historic associations or communal value?
- Whether harm can be avoided, minimised or mitigated through design refinement or alternative options?
- Where there are opportunities to sustain, reveal or enhance significance?

The focus should be on clarity and comparison, not premature final judgement. At this stage, the assessment may identify likely areas of harm or benefit, but further detail may be needed before a final planning judgement can be made.

- **heritage benefits,** such as repair, conservation, enhancement, improved setting, interpretation, public access or long-term stewardship;
- **social benefits,** such as community use, inclusion, wellbeing, identity or local pride;
- **environmental benefit**s, such as reuse, carbon savings, biodiversity, landscape stewardship or climate resilience;
- **economic benefits**, such as investment, employment, tourism, local enterprise or long-term viability;
- **cultural benefits,** such as learning, skills, craftsmanship, memory, meaning and continuity.

The appraisal should distinguish between heritage benefits and wider public benefits, while recognising that these may overlap. For example, opening a historic building to the public may be both a heritage benefit, because it improves access and understanding, and a wider social benefit, because it supports community use and local identity.

- Whether the proposal represents a proportionate and justified response?
- How options compare in terms of overall outcomes?
- What is gained and what is compromised in each proposal?
- Whether benefits are credible, evidenced and deliverable?
- Whether further refinement could reduce harm or strengthen benefits?

The appraisal should then consider how the likely harm and public benefits relate across the options.

WORKING APPROACH

- Compare emerging options in a proportionate and structured way.
- Identify what is gained, what is compromised, and where trade-offs arise.
- Consider whether likely impacts can be avoided, reduced, mitigated or improved through refinement.
- Use the CHCA dimensions to support discussion, not as a substitute for professional judgement

EXPECTED OUTCOME

- Clearer understanding of likely heritage harm and public benefits across options.
- Identification of key issues, trade-offs and areas of uncertainty.
- Basis for refining, progressing or discounting options.
- Clearer route into viability and deliverability testing in Stage 5.

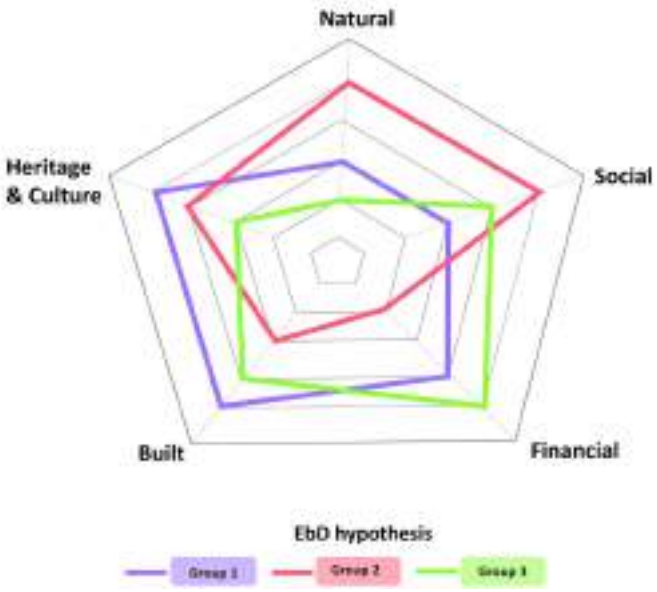
Where helpful, the Community and Heritage Capital Assessment can support this stage by comparing options across the following dimensions:

Dimension of capital	Description
Natural	ecosystems / landscape / resource use
Social	access / inclusion / community use / health and wellbeing
Financial	viability / future sustainability - including planning for funding future maintenance and management
Built	carbon saving / repurposing materials (in whole or part) / adaptability and performance
Heritage & Culture	safeguarding / retention / preserving and enhancing / significance / identity

The results may be visualised through a simple radar or spider diagram to compare options. This should not be understood as a final score or as a substitute for professional judgement. Instead, it provides a visual way of identifying relative strengths, weaknesses and trade-offs between options.

For example, one option may perform strongly in financial viability but less well in relation to heritage sensitivity, while another may better sustain significance but require further testing around delivery or funding.

This stage supports the application of policy tests (such as balancing harm and public benefit) by enabling early understanding of impacts, helping to inform and streamline later statutory assessment.



Multi – Dimensional Assessment of Public Benefits vs Harm using the CHCA

WORKING APPROACH

- ◊ Compare emerging options in a proportionate and structured way.
- ◊ Identify what is gained, what is compromised, and where trade-offs arise.
- ◊ Consider whether likely impacts can be avoided, reduced, mitigated or improved through refinement.
- ◊ Use the CHCA dimensions to support discussion, not as a substitute for professional judgement.

EXPECTED OUTCOME

- ◊ Clearer understanding of likely heritage harm and public benefits across options.
- ◊ Identification of key issues, trade-offs and areas of uncertainty.
- ◊ Basis for refining, progressing or discounting options.
- ◊ Clearer route into viability and deliverability testing in Stage 5.

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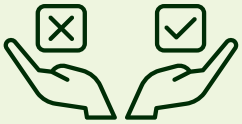
STAGE 5
TEST VIABILITY & DELIVERABILITY

This stage tests whether emerging options are realistic, viable and capable of being delivered. Heritage-sensitive proposals may be conceptually strong but still require careful testing against practical constraints, including cost, phasing, funding, ownership, operation, maintenance and long-term stewardship.

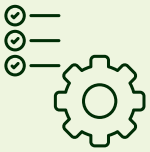
Viability and deliverability should not be treated as late technical checks. They are central to whether public benefits can actually be realised. A proposal that appears beneficial in principle may not deliver long-term value if it cannot be implemented, funded or maintained over time. It involves three main areas of testing.

This stage is particularly important because viability and public benefit are closely connected. Long-term conservation often depends on finding an appropriate use, funding model or management structure that can sustain the asset over time. Testing deliverability therefore helps ensure that the emerging direction of travel is not only desirable, but also realistic.

TESTING VIABILITY



TESTING DELIVERABILITY



UNDERSTANDING RISK

- ◊ Is the option financially viable in terms of cost, value and funding route?
- ◊ Does the proposed use support long-term sustainability?
- ◊ How sensitive is the option to changes in cost, market conditions, phasing or funding?
- ◊ Does the proposal create a realistic basis for repair, maintenance and ongoing stewardship?
- ◊ Does the level of intervention remain proportionate to the benefits delivered?

- ◊ Are there technical constraints relating to structure, access, servicing or infrastructure?
- ◊ What are the key planning and consent risks?
- ◊ Are there dependencies relating to ownership, partners, funding or approvals?
- ◊ Is the delivery approach realistic in relation to phasing, programme and complexity?
- ◊ Are management and maintenance responsibilities clear?

- ◊ What are the key risks to delivery?
- ◊ Where are the uncertainties or assumptions?
- ◊ What could prevent the project from progressing?
- ◊ What further evidence is required?
- ◊ Which risks can be managed through refinement, phasing or additional work?

WORKING APPROACH

- ◊ Test options against real-world constraints
- ◊ Engage relevant stakeholders (client, consultants, authorities)
- ◊ Refine or discount options where necessary

EXPECTED OUTCOME

- ◊ Clear understanding of which options are viable and deliverable
- ◊ Identification of key risks and constraints
- ◊ Refinement of options in response to practical constraints
- ◊ Clearer understanding of phasing and funding requirements
- ◊ A basis for progressing into formal pre-application, PPA or planning submission

STAGE 6
REFINE AND IDENTIFY DIRECTION OF TRAVEL

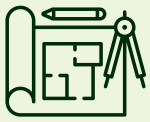
The final stage brings together the findings from earlier stages to refine options and establish a clear direction of travel. This does not necessarily mean that a final scheme has been agreed. Rather, it means that stakeholders have reached a clearer understanding of which options are most appropriate, what further work is required and how the proposal should proceed.

The purpose of this stage is to avoid premature closure while still providing enough clarity to support progression. In complex heritage contexts, the best outcome may be an agreed set of principles, a preferred option, a route for further testing or a structured basis for formal pre-application discussion. It involves three main activities.

The framework remains iterative. If new information emerges, or if unresolved issues remain, the process may return to earlier stages. This is especially likely between option development, appraisal and viability testing.

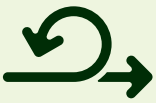
This stage is important because it translates collaborative exploration into a practical next step. It helps ensure that the process produces a clear and usable outcome, while retaining the flexibility needed for further refinement.

REFINING PROPOSALS



RESOLVING ISSUES

ITERATING THE PROCESS



- ◊ adjusting the direction of travel to reduce harm or strengthen benefits
- ◊ improving viability and deliverability
- ◊ responding to issues identified through appraisal
- ◊ refining the relationship between use, access, conservation and public benefit
- ◊ strengthening long-term stewardship and management proposals

- ◊ working through tensions between heritage, viability, client objectives and public benefit
- ◊ revisiting earlier assumptions where required (particularly Stages 3–5)
- ◊ clarifying unresolved evidence gaps
- ◊ aligning stakeholders around a preferred direction and approach
- ◊ identifying matters that will need to be addressed through formal planning or listed building consent processes

- ◊ an option that is broadly acceptable
- ◊ an option that is acceptable with modification
- ◊ an option that is fundamentally problematic
- ◊ a need for further evidence or testing before a direction can be confirmed

EXPECTED OUTCOME

- ◊ A preferred direction of travel
- ◊ A more defined proposal or approach to be taken forward.
- ◊ A list of unresolved matters
- ◊ A record of trade-offs and decisions
- ◊ Clear understanding of why this option is being taken forward
- ◊ Agreed basis for progressing into design development and statutory processes
- ◊ A schedule of further work

EbD Workshop © The King's Foundation

SUMMARY: FROM SEQUENTIAL JUDGEMENT TO ITERATIVE DECISION-MAKING

The framework proposed responds to a central weakness in conventional heritage planning processes: the tendency to address significance, harm, benefit, viability and stakeholder perspectives sequentially, often after proposals have already been substantially developed.

By contrast, this framework proposes an integrated and iterative process. It begins with shared understanding, uses collaborative design to explore options, applies structured appraisal to clarify harm and public benefit, and tests whether proposals are viable and deliverable before a preferred direction of travel is refined.

Enquiry by Design provides the process through which this collaboration can take place. The Community and Heritage Capital Assessment provides the appraisal layer through which values, benefits and trade-offs can be made visible. Together, they support a more transparent, holistic, proportionate and adaptive approach to planning applications affecting heritage assets.

The framework does not remove the need for statutory decision-making. Instead, it helps prepare better-informed proposals, develop clearer evidence and establish more robust reasoning before formal decisions are made, while improving efficiency during these early stages. In doing so, it can reduce late-stage conflict, support more constructive engagement and improve the quality of outcomes for heritage assets, communities and places.

Benefits of the Framework

FOR COMMUNITIES

The framework promotes more inclusive and transparent processes by:

- ◊ increasing transparency in decision-making
- ◊ supporting more buildings and places to be brought back into viable use for the future
- ◊ enabling meaningful engagement in early-stage decision-making before designs are set
- ◊ helping to preserve and enhance shared social and cultural value, including intangible heritage

FOR PLANNING AUTHORITIES

The framework enhances the effectiveness of pre-application processes while responding to capacity and policy pressures by:

- ◊ enabling a more constructive pre-application dialogue
- ◊ reducing administrative burden / capacity building
- ◊ addressing some early unknowns.
- ◊ removing potential duplication of conversations
- ◊ helping to break down siloed thinking and working.
- ◊ supporting delivery against wider environmental targets, including climate goals and reuse of existing buildings
- ◊ enabling more effective and meaningful engagement with stakeholders at earlier stages

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FOR CLIENTS

The framework supports more informed and strategic project development by:

- ◊ providing clearer strategic direction
- ◊ reducing project risk through early identification of constraints and opportunities
- ◊ enabling the development of better, more integrated schemes
- ◊ improving efficiency in project timeline/ streamlining input
- ◊ enabling early buy-in from multiple stakeholders

FOR HERITAGE BODIES AND STATUTORY CONSULTEES

The framework strengthens their role within the process by:

- ◊ enabling earlier engagement on design
- ◊ safeguarding the heritage perspective within broader development discussions and ensuring that it is balanced alongside multiple other constraints
- ◊ supporting early conversations with other statutory consultees
- ◊ bringing an opportunity for dialogue with multiple groups of stakeholders
- ◊ improving longer-term efficiency in supporting the conservation, repurposing, and reuse of heritage assets

View of Edinburgh © Pexel / Gavin Young

Implications for Policy and Practice

The framework is particularly timely in the context of current discussions about the role, capacity and effectiveness of statutory consultees within the planning system and the overall need for the reuse and safeguarding of heritage assets. It demonstrates how earlier dialogue and structured engagement can improve the efficiency, clarity and quality of decision-making.

The framework is not intended to replace statutory consultation, but to strengthen it. By establishing a shared understanding of key issues before formal stages, it can help identify constraints, opportunities and potential areas of conflict while proposals are still capable of meaningful change.

This can reduce duplication, avoid late-stage disputes and enable statutory consultees and planning authorities to focus their resources on the most material issues. It may be especially valuable where institutional capacity is limited, providing greater structure and coordination without requiring significant additional resources.

For applicants, the framework offers a clearer process for testing options, understanding evidential requirements and balancing heritage harm, public benefit, viability and deliverability. For decision-makers, it provides a more transparent basis for assessing how different considerations have been addressed.

More broadly, the framework supports a shift from reactive and sequential consultation towards a more collaborative and iterative approach. This aligns with wider ambitions to improve planning performance, design quality and the sustainable reuse and long-term stewardship of historic buildings and places.

Applying the Framework

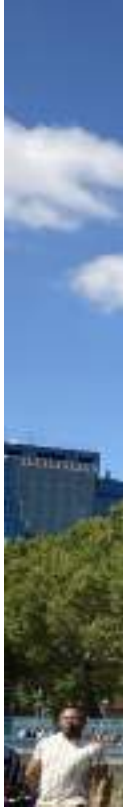
The following case studies show how the decision-making framework can be applied in different heritage contexts. They are not presented simply as examples of Enquiry by Design, but as illustrations of how the wider framework supports shared understanding, option testing and clearer judgements about harm and public benefit.

In each case, the framework helps structure the process: first by clarifying significance, evidence and constraints; then by framing opportunities and tensions; testing possible options; appraising harm and public benefit; and refining a deliverable direction of travel. Enquiry by Design acts as the process layer within this wider framework, enabling stakeholders to work collaboratively before proposals become fixed.

Custom House demonstrates how the framework can support decision-making for a highly significant listed building in a dense urban context. Waltham Abbey Royal Gunpowder Mills illustrates its application to a complex heritage landscape where conservation, ecology, visitor experience and long-term viability are closely connected.

Together, the case studies demonstrate that the framework is not a fixed formula, but a structured way of working through complexity. It helps move heritage from being treated as a late-stage constraint to becoming a formative part of shaping more coherent, viable and publicly beneficial proposals.

EbD Workshop © The King's Foundation



Case Study: Custom House

INTRODUCTION

Custom House is a Grade I listed building occupying a prominent position on the north bank of the River Thames within the City of London. The site has been associated with customs activity for over 800 years and played a central role in Britain's trading, taxation and maritime infrastructure. Despite its significance, the building remains relatively under-researched and has historically had limited public access due to its occupation by HMRC.

Proposals to convert Custom House into a hotel were submitted in 2020 but attracted significant heritage concerns from the local authority and statutory consultees, including the Georgian Group. The Group subsequently appeared as a Rule 6 Party at the 2022 public inquiry alongside the applicant and local authority. The applications were refused owing to the harmful intensity of the proposed hotel use, particularly its impact on the building's historic plan form and significance. The case demonstrated the importance of early consultation and broad agreement between key stakeholders, helping to avoid delays, appeals and unnecessary costs.

Following a change in ownership, a revised approach was adopted through an Enquiry by Design (EbD) process facilitated by The King's Foundation (formerly The Prince's Foundation). This brought together a broad range of stakeholders to establish a shared understanding of the building, its constraints and opportunities, prior to the commencement of the formal PPA process.
This case study explores how early engagement and collaboration with key consultees can contribute to more successful heritage outcomes.

SIGNIFICANCE OF THE BUILDING

As a Grade I listed building, Custom House is recognised for its exceptional architectural and historic interest, placing it within the top 2.5% of protected buildings in England (Historic England, 2025).

The present building was constructed between 1813 and 1817 to the designs of David Laing, before parts of the central section were rebuilt by Sir Robert Smirke following the structural collapse of 1824–25. The eastern wing was later reconstructed after bomb damage sustained during the Second World War. Despite these phases of alteration, the building retains a high degree of significance, particularly within the western wing and principal ceremonial spaces.

Architecturally, Custom House is one of London's most imposing early nineteenth-century public

Custom House © The King's Foundation

buildings. Designed in a monumental neo-classical style, its principal river frontage expressed the authority of the British state at the height of imperial trade. Its significance derives not only from its external composition, but also from the survival of important internal spaces and circulation patterns that illustrate the operation of the customs system.

The Long Room is among the building's most significant interiors, historically serving as the administrative centre of Britain's customs operations. Other important spaces include the King's Warehouse, principal entrance hall, staircases, Robing Room and Tide Waiters' Room. The western wing is especially significant due to the survival of its historic plan form and cellular office arrangement, providing a rare and remarkably intact example of early purpose-built office accommodation in the City. Features such as internal courtyards, borrowed light, fanlights and restrained joinery reflect the influence of John Soane, to whom Laing had been articled.

The building also derives significance from its historic relationship with the Thames. The adjoining Grade II* listed river wall, stairs and cranes help illustrate how goods and people moved between river and building, forming an important part of the site's historic function.

Importantly, significance is not uniform throughout the building. The West Wing, Long Room and principal ceremonial spaces are identified as areas of highest significance and therefore least capable of accommodating substantial change, whereas the reconstructed East Wing possesses greater capacity for adaptation (due to its reconstruction following bomb damage during the Second World War which resulted in a reconstructed classical façade with a modern office block structure within). Understanding these distinctions has been fundamental in informing where interventions may be appropriate and how harm can be minimised and how the building's longer-term use can be secured.

PREVIOUS SCHEME AND PLANNING CHALLENGES

The redevelopment of Custom House has been ongoing since pre-application discussions began in 2018 and has been characterised by complexity and contention. The previous scheme was refused after a public inquiry in 2022, highlighting the challenge of balancing conservation, viability and new uses within such a highly sensitive heritage asset.

Key challenges included:

- Managing harm to highly significant interiors, particularly to the West Wing.
- Resolving servicing and access constraints within a historic structure, including the implications of building servicing strategies associated with the new use.
- Addressing public access and engagement expectations. which formed a central concern among stakeholders.
- Avoiding harmful subdivision of historic spaces and maintaining the integrity of the building's plan form.
- Navigating multiple stakeholders, including statutory consultees, heritage bodies and local authorities.

EbD Workshop © The King's Foundation

This failure of the earlier scheme reflects a broader issue within planning, where proposals can become fixed before a sufficiently shared understanding of significance and acceptable level of change is established. This can result in harmful interventions, particularly to plan form and key spatial elements. It can also lead to conflict between conservation priorities, public access expectations, and the requirements of viable reuse.

ENQUIRY BY DESIGN

Following the change in ownership, a fundamentally different approach was adopted, starting with a two-day Enquiry by Design (EbD) process facilitated by The King's Foundation. Rather than progressing directly into formal design proposals, the EbD process brought together a broad group of stakeholders at an early stage, including the client, design team, a handful of statutory consultees, conservation bodies, technical specialists, heritage research specialists, as well as archaeological, river and civic organisations, built environment networks alongside advocacy and engagement groups (SAVE Britain's Heritage).

Site visit, Custom House © The King's Foundation

The process created a structured environment in which shared technical briefings could take place covering key aspects such as heritage significance, planning history, policy context, transport and access, structural strategy, and sustainability. This enabled open discussion of constraints and opportunities and ensured that all participants were working from a common evidence base.

Through a combination of technical sessions, site visits and workshop activities (including SWOT analysis undertaken in mixed stakeholder groups), alternative approaches were explored and tested prior to the development of formal proposals. This supported the emergence of a shared understanding of the building's significance, constraints and potential, and helped to establish an agreed direction of travel before design decisions became fixed.

Custom House © The King's Foundation

DESIGN DEVELOPMENT AND PPA PROCESS

Following the EbD process, the project progressed through a structured Planning Performance Agreement (PPA) with the City of London. This included a series of formal pre-application meetings covering heritage, planning, highways, sustainability, public realm and land use, alongside ongoing dialogue with planners and stakeholders. In parallel, the design team developed a coordinated body of work, including conservation and significance assessments, phasing and spatial analysis, transport, heritage impact assessment, social history research, and concept design and technical strategies.

Through this process, a number of key principles began to emerge. The approach prioritised working with the existing building, retaining fabric wherever possible and focusing change in areas of lower significance, particularly within the East Wing. Public access was embedded as a central objective, with proposals aimed at opening the building to a wider audience rather than limiting it to a single use. At the same time, the scheme addressed the practical challenges of circulation and servicing within a historic structure, while maintaining a strong emphasis on sustainability through reuse, embodied carbon reduction and whole-life performance. Key spaces, including the Long Room and the King's Warehouse and Tide Waiters' Room, were positioned as focal points for activity and public engagement.

The City of London has been generally supportive of the emerging approach, particularly where it demonstrates a reduced level of intervention compared to earlier proposals, a stronger public and cultural offer, and a clearer integration of sustainability and access strategies. Overall, the iterative and collaborative nature of the process has led to a more robust and policy-aligned scheme, progressing towards approval. This approach was ultimately reflected in the granting of planning permission and listed building consent in September 2025, when the City of London Corporation unanimously approved proposals to

redevelop Custom House into a 179-room hotel with associated public and cultural uses. The approved scheme places particular emphasis on allowing public access, including access to key spaces such as the Long Room and on re-establishing a stronger relationship with the riverfront through new publicly accessible spaces. The decision marks a significant shift from earlier refused proposals, demonstrating how a more collaborative and iterative process early on can support the delivery of complex heritage projects.

EbD Workshop © The King's Foundation

KEY OUTCOMES OF THE EBD PROCESS

The EbD process directly informed the emerging vision for the building:

- ◊ Opening up public access and engagement, moving away from a closed institutional model.
- ◊ Establishing a "golden thread" of interpretation throughout the building.
- ◊ Developing a mixed-use strategy (hotel, F&B, cultural, public uses).
- ◊ Identifying opportunities to reconnect the building to the riverfront and tie into the wider public realm and Northbank public realm projects.
- ◊ Embedding sustainability and reuse principles, including retention of the East Wing structure for embodied carbon benefits.

Crucially, the process reframed the project from a design-led proposal to a shared engagement and co-design process with heritage harm and public benefits forming key discussion points from the outset.

KEY LESSONS

The Custom House case study highlights several lessons relevant to heritage-led regeneration and decision-making within complex planning applications.

1. Early engagement builds trust. Bringing stakeholders together at the outset created space for open discussion, allowing different viewpoints to be heard in person and concerns to be addressed before positions became fixed. This helped reduce adversarial dynamics later in the process.

2. Shared understanding enables better decisions. Workshops and technical briefings established a common understanding of heritage significance, constraints and opportunities, as well as the trade-offs involved in balancing harm and benefit. This shifted discussions from position-based negotiation to a more evidence-led and holistic approach.

3. Design direction and consensus emerge collaboratively. The EbD process enabled options to be explored and tested at an early stage, allowing key principles to be agreed collectively. This reduced the risk of late-stage redesign and planning conflict.

4. Viability is embedded within the EbD process. Economic considerations were discussed and addressed alongside heritage and planning issues from the outset. The development of a mixed-use approach demonstrates how long-term viability can be aligned with conservation and public benefit.

5. Balancing harm and benefit requires a holistic approach. Assessment extended beyond the impact on fabric to include social value, environmental performance and long-term sustainability. This reflects the broader NPPF framework for decision-making.

6. The project demonstrates that **complex heritage schemes are not resolved through design alone, but through the way decisions are structured and negotiated.** Early collaboration provided a clearer and more deliverable direction.

The approved project for Custom House © Orms / Secchi Smith

Case Study: Waltham Abbey Royal Gunpowder Mills (WARGM)

INTRODUCTION

The Waltham Abbey Royal Gunpowder Mills (WARGM) site presents a compelling example of the challenges associated with balancing heritage conservation with long-term site viability. Located within the Lee Valley Regional Park in Essex, the site represents a complex twentieth-century industrial heritage landscape, combining significant built heritage, ecological designations and visitor infrastructure.

Despite its importance as a heritage attraction, the site has struggled to generate sufficient income to support the conservation and maintenance of its historic buildings and landscape.

A visitor attraction has operated on the site since 2001, but this model has proved insufficient to address the significant conservation deficit associated with maintaining the site's 21 listed buildings, historic fabric and landscape infrastructure. As a result, the WARGM Charitable Foundation initiated a process to explore a sustainable future for the site through a mixed business model which could be capable of generating revenue while protecting the site's unique heritage and environmental assets.

To support this process, The King's Foundation facilitated a two-day stakeholder workshop using the Enquiry by Design (EbD) methodology. This approach sought to bring together key stakeholders (including heritage organisations, ecological bodies, planning authorities, and community representatives) to collaboratively develop a framework vision for the site through a series of technical briefings and workshops. The process aimed to establish a shared understanding of the site's constraints and opportunities and to identify potential development strategies capable of supporting both heritage conservation and economic sustainability.

Wider context plan with WARGM site edged in red.

The Grade I* listed Incorporating Mill, WARGM

SIGNIFICANCE OF THE SITE

The Waltham Abbey Royal Gunpowder Mills represents one of the most significant historic industrial landscapes in England. The site contains a collection of historic industrial buildings associated with the manufacture of gunpowder and later explosives, forming a complex landscape of mills, waterways, magazines, and associated infrastructure. Twenty-one of these buildings are listed and form part of a wider historic landscape that illustrates the technological and industrial development of explosives manufacturing. Among the most significant structures on the site is the Grade I* listed Incorporating Mill (Building L157), which forms one of the most historically important buildings within the complex. Conservation works have been undertaken on this structure to stabilise its fabric and secure its long-term preservation. The site also contains several other listed buildings, including the former boiler house and Walton House, which have already been adapted for new uses such as cafés, offices, and teaching spaces.

One of many declining structures on the WARGM site

Drawing of the grade I* listed Incorporating Mill (Building L157)
© WARGM

Hydraulic Press House, WARGM

Importantly, the significance of the site extends beyond individual listed buildings. As stakeholders noted during the workshop, many unlisted structures also contribute positively to the character and integrity of the historic industrial landscape. The site's value therefore lies not only in individual heritage assets but in the spatial relationships between buildings, waterways, and landscape features that together illustrate the evolution of the explosives manufacturing process.

The historic landscape is further embedded within a wider ecological and regional context. The site lies within the Lee Valley Regional Park and is surrounded by environmentally sensitive habitats, including areas designated as Sites of Special Scientific Interest (SSSI) and part of a wider Ramsar and Special Protection Area. These ecological constraints add an additional layer of complexity to any development proposals, requiring careful consideration of biodiversity, water systems, and visitor management. Together, these factors make WARGM a highly significant but also highly constrained heritage landscape.

PREVIOUS DEVELOPMENT CHALLENGES

The future of the site has been the subject of debate for many years. Previous development proposals had generated significant conflict among stakeholders, particularly where commercial uses were perceived as potentially undermining the heritage and visitor functions of the site.

Volunteers and local stakeholders noted that earlier proposals had suggested concentrating the heritage visitor attraction in the northern part of the site while introducing more commercially driven uses elsewhere. These proposals were perceived by some stakeholders as diluting the heritage character of the site and potentially displacing existing heritage activities. As a result, earlier attempts to develop a future vision for the site had generated significant disagreement and tension between stakeholders.

These tensions highlighted the need for a more collaborative process capable of bringing together different perspectives and identifying development strategies that could reconcile heritage conservation, environmental protection, and economic sustainability.

One of many declining structures on the WARGM site © King's Foundation

EbD Workshop © The King's Foundation

ENQUIRY BY DESIGN APPROACH

To address these challenges, the WARGM organisation invited The King's Foundation to facilitate a stakeholder engagement process using the Enquiry by Design (EbD) methodology. During the workshops, stakeholders were first provided with a series of technical briefings covering key aspects of the site, including heritage significance, ecological constraints, infrastructure challenges, planning and policy considerations. These briefings ensured that all participants had a shared understanding of the site's conditions before entering the design workshop sessions.

The EbD process then proceeded through a series of collaborative discussions and design exercises aimed at identifying common priorities and potential development strategies. Unlike traditional planning processes, which often involve sequential consultation with different specialists, the EbD approach encourages parallel and integrated discussions between stakeholders. This approach helps to identify areas of consensus while enabling technical issues to be explored collaboratively.

Stakeholders worked in deliberately mixed workshop groups, bringing together different disciplines and perspectives to work through issues collectively.

Through this process, a framework masterplan was developed capable of accommodating heritage conservation, ecological protection and new economic uses, while also establishing land uses, phasing and deliverability to support the site's long-term sustainability.

EbD Workshop © The King's Foundation

KEY LESSONS

The WARGM case study highlights several lessons relevant to heritage planning and regeneration.

1. The case demonstrates **the importance of collaborative planning processes when dealing with complex heritage landscapes.** Traditional planning approaches that rely on sequential consultation can often exacerbate conflicts between stakeholders. In contrast, the EbD methodology provides a structured platform for dialogue and shared problem-solving.

2. It illustrates that **heritage conservation and economic viability must be addressed together.** The long-term sustainability of heritage sites often depends on identifying new uses capable of generating revenue while respecting heritage significance.

3. It highlights **the importance of integrating heritage, environmental, and economic considerations within a single planning framework.** At WARGM, heritage assets, ecological designations, and regional tourism strategies are closely intertwined, requiring development proposals that respond holistically to multiple constraints.

4. The project demonstrates that **establishing a shared vision among stakeholders can significantly reduce conflict and create a stronger foundation for future planning applications.**

EbD Workshop © The King's Foundation

CONCLUSION

The challenge of balancing harm and public benefit in relation to heritage assets is not simply a matter of applying policy tests. It is fundamentally a question of process. Where decisions are made through sequentially reactive systems, stakeholders are often invited to comment only after proposals have become fixed. Advice is provided in silos, conflicting priorities emerge late in the process, and opportunities to avoid harm or enhance public benefit may already have been lost.

The framework presented in this report suggests that a proactive, place-based and iterative approach can offer a more robust alternative. By applying the Enquiry by Design process, stakeholders can develop a shared understanding of significance, explore options collectively, test trade-offs transparently and build consensus around an appropriate direction of travel in an iterative and holistic way. Harm and benefit are not considered as abstract concepts assessed retrospectively, but as factors that are continuously weighed and refined through dialogue, site-based learning and collaborative design.

This approach is particularly valuable for complex heritage contexts, whether individual buildings, historic landscapes or places. The Custom House case study demonstrates that when statutory consultees, communities and decision-makers engage together in the place itself, the balancing exercise becomes clearer, more efficient and more sophisticated. Rather than asking participants to defend entrenched positions, it enables them to become co-authors of solutions.

The implication is clear: if we wish to secure better outcomes for heritage assets and the communities they serve, we must pay as much attention to the quality of the decision-making process as we do to the quality of the final proposal. A simultaneously proactive, place-based and iterative approach provides a stronger foundation for balancing harm and benefit, supporting the long-term stewardship of heritage, reducing embodied carbon through the continued use and adaptation of existing buildings, and delivering wider public value.

Custom House © The King's Foundation

APPENDIX

COMMUNITY AND HERITAGE CAPITAL ASSESSMENT

Every place is endowed with natural, financial, social and built assets, which together form the 'Four Pillars of Sustainability' underpinning The King's Foundation Community Capital Framework.
In heritage and cultural contexts, the framework is expanded into a five-pillar model, incorporating Heritage & Cultural to reflect the role of significance, identity and long-term continuity in shaping place.

L	BUILT	HERITAGE & CULTURAL
forms of tenancy and ement of assets. *r the community to create* *suited to their needs.*	**PLACE MAKING** Delightful places that people love and want to be in. *e.g. architecture that is mindful of local materials, climate and character.*	**SIGNIFICANCE** Understanding what matters and why. *e.g. archaeological / architectural / artistic / historic interest, and the elements that contribute to the significance of the asset.*
nd local goods as well ercial hubs and local *cal markets and supply*	**INTER-CONNECTED** Neighbourhoods with connected walkable streets allowing access to public spaces and transportation. *e.g. logical routes to enable access to daily needs within walking distance of residential areas.*	**LEGIBILITY & INTERPRETATION** Making heritage visible, accessible and understandable. *e.g. revealing layers of history through design, storytelling and public access; interpretation strategies embedded in place.*
economy and a mixed nt. *l goods and services that*	**PROPORTIONAL** Places with beautiful and well-scaled architecture and a mix of building types. *e.g. a high street with coherent shop fronts.*	**IDENTITY & INCLUSION** Reinforcing local distinctiveness and shared cultural value. *e.g. reflecting cultural continuity in use and design,inclusive access to heritage, community participation and cultural programming.*
c framework with a nomic activities at *th model of housing* *amenities.*	**DURABLE** Building types, spaces and uses that are suited for the region and which can adapt and change over time. *e.g. buildings that can adapt into smaller or larger units or accommodate a change of use.*	**CONTINUITY & ADAPTATION** Supporting ongoing sustainability through change and reuse. *e.g. adaptive reuse of historic assets, maintaining heritage value while accommodating new uses over time.*
lanning with a vision for eturns. *mely maintenance and* *ent.*	**PRESERVATION** A priority to refurbish and renovate with recycled and lasting materials from renewable sources. *e.g. well - insulated building stock that uses passive methods of cooling and heating.*	**LONG-TERM VALUE** Managing heritage as a lasting asset. *e.g. conservation management, maintenance strategies and viable uses that support long-term care and investment.*

ACRONYMS

CCC – Climate Change Committee

CHC – Culture and Heritage Capital

CHCA – Community and Heritage Capital Assessment

DCMS – Department for Culture, Media and Sport

EbD – Enquiry by Design

F&B - Food and Beverage

FTE – Full-Time Equivalent

GPA – Good Practice Advice (Historic England)

HE – Historic England

HMRC – His Majesty's Revenue and Customs

ICH – Intangible Cultural Heritage

LPA – Local Planning Authority

MHCLG – Ministry of Housing, Communities and Local Government

NGO – Non-Governmental Organisation

NPPF – National Planning Policy Framework

PPA – Planning Performance Agreement

RPG – Registered Parks and Gardens

RTPI – Royal Town Planning Institute

SPA – Special Protection Area

SPD – Supplementary Planning Document

SSSI – Site of Special Scientific Interest

WARGM – Waltham Abbey Royal Gunpowder Mill

GLOSSARY

Adaptive reuse - The reuse of an existing building for a new purpose while retaining its heritage significance.

Built capital - The physical components of the built environment, including buildings, infrastructure and urban form.

Community and Heritage Capital Assessment (CHCA) - A framework used to assess the value of a place across environmental, social, economic and heritage/cultural dimensions.

Conservation - The process of managing change to a heritage asset in a way that sustains its significance, and where appropriate enhances it.

Deliverability - The extent to which a proposal can realistically be implemented, taking account of technical, regulatory, organisational and financial constraints.

Embodied carbon - The greenhouse gas emissions associated with the materials, construction and lifecycle of a building.

Enquiry by Design (EbD) - A collaborative and interdisciplinary process through which stakeholders work together to explore and develop proposals.

Financial capital - Economic resources associated with a place or proposal, including funding, investment and supporting long-term maintenance.

Harm (to significance) - Change to a heritage asset that results in a loss of significance.

Heritage asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions.

Heritage benefit - A benefit directly related to the conservation or enhancement of a heritage asset, improved access to it, or greater understanding of its significance.

Heritage capital - The stock of heritage assets that provides a range of benefits to society over time.

Heritage interest - The archaeological, architectural, artistic or historic interest of a heritage asset.

Heritage significance - The value of a heritage asset to present and future generations because of its heritage interest.

Intangible cultural heritage (ICH) - Practices, expressions, knowledge and skills that communities recognise as part of their cultural heritage.

Iterative decision-making - A process in which proposals are developed and refined through repeated testing and review.

Natural capital - Environmental assets including landscapes, ecosystems, biodiversity and natural resources.

Planning balance - The process of weighing harm to the significance of a heritage asset against the public benefits of a proposal.

Public benefit - An outcome arising from a proposal that benefits the public, including economic, social and environmental benefits recognised in planning policy.

Sequential decision-making - A process in which decisions are made in a linear sequence of stages.

Setting (of a heritage asset) - The surroundings in which a heritage asset is experienced and which contribute to its significance.

Social capital - The networks, relationships and shared values that contribute to community identity and cohesion.

Substantial harm / less than substantial harm - Terms used in planning policy to describe the degree of harm to the significance of a heritage asset.

Viability - The financial feasibility of delivering and sustaining a proposal over the long term.

REFERENCES

Butler, C.W., Richardson, M., Kirton, M., Dommett, T., & Hogan, S. (2025). Heritage Connection: Scoping and sounding the field. University of Derby Vice-Chancellor's Partnership Award Report. Available at: https://findingnature.org.uk/wp-content/uploads/2025/12/heritage_connection_report.pdf

Civic Voice (2018) What is the Future for Our Conservation Areas? London: Civic Voice.

Clark, K. (2003) Informed Conservation: Understanding Historic Buildings and their landscapes for conservation. London: English Heritage. ISBN-13 : 978-1873592649

Cross, N. (2011) Design Thinking: Understanding How Designers Think and Work. Oxford: Berg. ISBN 9781847888464.

Climate Change Committee (2026) A Well-Adapted UK: The Fourth Independent Assessment of UK Climate Risk. London: Climate Change Committee. Available at: https://www.theccc.org.uk/wp-content/uploads/2026/05/A-Well-Adapted-UK-CCRA4-IA-784y9813-3094039i85t59yhfufoub24f2bipdj1.pdf

Department for Culture, Media and Sport (DCMS) (2024) Culture and Heritage Capital Framework. London: DCMS. Available at: https://www.gov.uk/government/publications/scoping-culture-and-heritage-capital-report/scoping-culture-and-heritage-capital-report

Fairbairn, S. (2019) 'The importance of specialist advice on building conservation projects', Built Environment Journal. Royal Institution of Chartered Surveyors (RICS). Available at: RICS Built Environment Journal article

Foroughi, M., de Andrade, B., Roders, A.P. and Wang, T. (2023). Public participation and consensus-building in urban planning from the lens of heritage planning: A systematic literature review. Cities, 135, 104235. Available at: https://doi.org/10.1016/j.cities.2023.104235

Gallou, E. (2022) Heritage and pathways to wellbeing: From personal to social benefits, between experience, identity and capability shaping. Wellbeing, Space and Society, 3, 100084. https://doi.org/10.1016/j.wss.2022.100084

Gallou, E., Uzzell, D. and Sofaer, S. (2022) Perceived place qualities, restorative effects and wellbeing benefits of visits to heritage sites, Wellbeing, Space and Society, 3, 100035. https://doi.org/10.1016/j.wss.2022.100035

Geels, F.W. (2011) 'The multi-level perspective on sustainability transitions: Responses to seven criticisms', Environmental Innovation and Societal Transitions, 1(1), pp. 24–40. https://doi.org/10.1016/j.eist.2011.02.002

Healey, P. (1997) Collaborative Planning: Shaping Places in Fragmented Societies. London: Macmillan. https://doi.org/10.1007/978-1-349-25538-2

Historic England (2008) Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment. London: Historic England. Available at: https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/

Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment (GPA2). London: Historic England. Available at: https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/

Historic England (2017) The Setting of Heritage Assets (GPA3). 2nd edn. London: Historic England. Available at: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

Historic England (2017) The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (2nd Edition) (GPA3). London: Historic England. Available at: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

Historic England (2019) Statements of Heritage Significance: Analysing Significance in Heritage Assets (Advice Note 12). Swindon: Historic England. Available at: https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/

Historic England (2025). Series 2 Issue 4: Report on Local Authority Historic Environment Staff Resources 2024. Available at: https://historicengland.org.uk/research/results/reports/9162/Series2Issue4_

Historic England (2023). Series 2 Issue 3: Report on Local Authority Historic Environment Staff Resources 2023.

Available at: https://historicengland.org.uk/images-books/publications/la-staff-resources-2023/report-local-authority-staff-resources-2023/

Historic England (2025a). Response to Energy Security and Net Zero Committee: Workforce Planning.Available at: https://historicengland.org.uk/content/docs/consultations/response-esnz-committee-secure-energy-jan25/

Historic England (2025b). The Heritage Dimension of Commercial Renewable Energy Development. Available at: https://historicengland.org.uk/research/results/reports/9246/

Historic England (2025) Intangible Heritage in Historic Contexts. Research Report 9276. Available at:https://historicengland.org.uk/research/results/reports/9276/IntangibleHeritageinHistoricContexts

Historic England (2025) What are listed buildings? Available at: https://historicengland.org.uk/listing/what-is-designation/listed-buildings/

Historic England (2026) Historic England Strategic Plan 2026–2031. London: Historic England. Available at: https://historicengland.org.uk/images-books/publications/he-strategic-plan-2026-31/he-strategy-2026/

House of Commons Culture, Media and Sport Committee (2026) Protecting Built Heritage: Third Report of Session 2026–27. HC 144. London: House of Commons. Available at: https://committees.parliament.uk/publications/54168/documents/301497/default/

Mason, R. (2002) Assessing Values in Conservation Planning: Methodological Issues and Choices. In Assessing the Values of Cultural Heritage, edited by M. de la Torre, 5–30. Los Angeles: Getty Conservation Institute. Available at: Assessing the Values of Cultural Heritage: Research Report

Ministry of Housing, Communities and Local Government (MHCLG) (2025) Proposed reforms to the National Planning Policy Framework and other changes to the planning system. London: UK Government. Available at: https://assets.publishing.service.gov.uk/media/697b6bc6aacd0dc9777b4fd2/December_2025_NPPF_Consultation.pdf

Ministry of Housing, Communities and Local Government (MHCLG) (2024) National Planning Policy Framework. London: UK Government. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

MHCLG (2025). Local Authority Planning Capacity and Capability Survey 2025. Available at: https://www.gov.uk/government/publications/local-authority-planning-capacity-and-capability-survey-2025

MHCLG (2025a). Local Authority Planning Capacity and Skills Survey 2023: Findings. Available at: https://www.gov.uk/government/publications/local-authority-planning-capacity-and-skills-survey-2023-findings

Planning (Listed Buildings and Conservation Areas) Act 1990, c. 9. Available at: https://www.legislation.gov.uk/ukpga/1990/9/contents

Richardson, M., Butler, C.W., Alcock, I., Tindley, A., Sheffield, D. and White, P.C.L. (2025) 'Introducing heritage connectedness: Connections to people, nature and place across time are associated with wellbeing and environmentalism',The Historic Environment: Policy & Practice, 16(1), pp. 38–58. https://doi.org/10.1080/17567505.2025.2482163

Reilly, S., Nolan, C. and Monckton, L. (2018) Heritage and society: The value of heritage to wellbeing. London: Historic England. https://historicengland.org.uk/advice/caring-for-heritage/wellbeing-and-heritage-advice/

Royal Town Planning Institute (RTPI) (2023) State of the Profession.Available at: State of the Profession 2023 | Championing the power of planning

Royal Town Planning Institute (RTPI) (2025). State of the Profession 2025: England. Available at: https://www.rtpi.org.uk/policy-and-research/state-of-the-profession-2025/state-of-the-profession-2025-england/

UNESCO (2024) Basic Texts of the 2003 Convention for the Safeguarding of the Intangible Cultural Heritage. Paris: United Nations Educational, Scientific and Cultural Organization (UNESCO). Available at: https://ich.unesco.org/doc/src/2003_Convention_Basic_Texts_2024_version_EN.pdf

Victorian Society (2025). Heritage Skills Crisis in Local Government.Available at: https://www.victoriansociety.org.uk/national-news/heritage-skills-crisis-in-local-government/

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