



MILLS SECTION

Solihull Metropolitan Borough Council
by email to: psp@solihull.gov.uk

12th March 2019

Re. Draft Local Plan of Solihull Borough Council

The SPAB Mills Section would like to comment on the above draft Plan in light of its impact on Berkswell Windmill in Windmill Lane, Balsall Common.

Berkswell Windmill is listed Grade II*, a category described by Historic England as 'particularly important buildings of more than special interest' and reserved for just 5.5% of listed buildings. The windmill is described in the list entry as 'the most complete example of a west midlands tower mill'. It is an irreplaceable resource, a rare surviving example of the local style of tower mill retaining all of its internal machinery. Following a recent period of extensive repairs – a substantial share of which were publically funded – the mill has successfully been returned to full working order.

Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act, 1990 requires that: *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting [...]*

The NPPF (paragraph 126) enjoins local authorities to recognise that designated heritage assets are irreplaceable resources and to conserve them in a manner appropriate to their significance. Paragraph 132 states:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'*

In addition to concerns about the likely visual impact of development on the setting of Berkswell Windmill, the Mills Section is concerned that development on the scale indicated in the Plan could damage the mill's ability to function fully in the future. The current capacity to turn the sails may be reduced by the construction of new buildings, which would diminish the wind strength to the extent that the sails would be almost impossible to turn. This is because new buildings positioned in the path of the oncoming wind, even those set some distance from the mill, create turbulence which can deflect the wind away from it. This reduces the amount of power the windmill's sails can develop.

If a designated heritage asset of the highest significance, recently returned to full working order at major public expense, should be made to become no longer operable as a consequence of development, then that development must be regarded as causing substantial harm to the heritage asset. As such, approval for such development would need to be wholly exceptional.

We therefore hope that full consideration be given to the likely harmful impact that development would have on this Grade II* listed windmill as a working mill, and on its setting.

Yours faithfully,



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