

Stratford-on-Avon District Council - Site Allocations Plan

Methodology for assessing impact on Heritage Assets

Introduction

The purpose of this heritage assessment process is to help inform the identification of sites in the Site Allocations Plan (SAP). The SAP is a 'tier 2' plan and when adopted, will sit alongside the adopted Core Strategy to form the statutory Development Plan for Stratford-on-Avon District to 2031. The SAP comprises four main components:

- Reserve housing sites
- Self-build and custom housebuilding sites
- Site specific proposals
- Built-Up Area Boundaries for Local Service Villages

Importantly, the adopted Core Strategy already delivers the District's housing requirement. The bulk of sites identified in the SAP will be reserve housing sites; sites that will only be brought forward for development should they be required. As such, reserve housing sites are not housing allocations as such; they are a pool of sites from which the Council can choose in order to help deliver homes if they are needed.

The identification of sites will be reached through an evaluation of all deliverable land parcels listed in the Council's Strategic Housing Land Availability Assessment (SHLAA). Through the assessment of the significance of the historic environment, the likely impact of the allocation of sites on affected heritage assets (both designated and non-designated) will be identified, and consideration given to whether such impact can be satisfactorily mitigated.

All SHLAA sites will be screened in line with the 'Five-Step' Site Assessment Methodology set out on page 2 of this document, with only the remaining proposed Sites in the SAP with potential to impact the historic environment being subject to Heritage Impact Assessment (HIA). The HIA's will be prepared with reference to Historic England's *Advice Note 3 (The Historic Environment & Site Allocations in Local Plans) 2015* (HEAN3) and *Good Practice Advice Note 3 (Second Edition): The Setting of Heritage Assets (2017)* (GPAN3).

Given the nature of the District and the scale of the development pressures, it will be highly likely that there will be some impact on heritage assets. This is not unusual as the planning system often has to balance benefits and impacts and competing objectives. The purpose of this work is to ensure that where there is harm identified, that it is fully assessed and mitigated in accordance with the overriding objective of the NPPF of conserving the asset *"in a manner appropriate to their significance"* (para.184).

Assessment of Significance

Understanding 'significance' is essential to enable the assessment of the potential impact of development following the allocation of sites. The NPPF (Annex 2: Glossary) defines the significance of a heritage asset as:

"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

Assessments will be undertaken in line with the above.

The NPPF sets out a hierarchy of significance and harm. In accordance with paragraphs 194 and 195, the Council will seek to avoid development that substantially harms a designated heritage asset. In accordance with paragraph 197 in respect of non-designated heritage assets, *"a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the [...non-designated...] heritage asset"*.

In this respect, where a site is identified within the Site Allocations Plan that potentially may harm the significance of a heritage asset, the Council will require the applicant to undertake and submit detailed heritage assessments as part of the application. The Council may also impose pre-commencement conditions relating to archaeological surveys in order to record evidence of the past.

This will be particularly relevant *“where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”* as per NPPF paragraph 189.

Assessment Methodology

The methodology follows the Site Selection Methodology set out in HEAN3 and GPAN3. They advocate the following 5-step approach:

Step 1 - Identify which heritage assets are affected by the potential site allocation

All of the SHLAA sites will be initially assessed as to whether they have any designated or non-designated heritage assets within or adjacent/close to their boundaries. This will provide an initial indication of the level of harm that may be caused by the development of the site in question.

A schedule for each settlement/location will be used to assist in this process. The schedule has separate columns for the initial assessed level of harm to different categories of designated and non-designated heritage assets, as follows:

Designated Heritage Assets:

- Conservation Area
- Scheduled Monument
- Listed Building
- Registered Parks and Garden
- Registered Battlefield Site

Non-designated Heritage Assets:

- Buildings of Historic Significance
- Ridge and Furrow
- Archaeological Site
- Archaeological Activity

The designated heritage assets will be assessed both in terms of the harm to the asset itself and to its setting. This may mean that assets which are outside but adjacent or close to a site will be identified as being affected depending on the level of harm that would be caused to the setting of that asset.

The non-designated heritage assets will be assessed in terms of harm to the asset itself, and their setting only where considered appropriate (for example, in the case of ‘Significant Buildings’).

A red/amber/green (RAG) rating system will be used to give an initial assessment of the predicted level of harm that would be caused to the asset(s) and, where applicable, its setting should the site be developed. The table at the top of page 3 of this document sets out the basis for this assessment, applying the definitions in the National Planning Policy Framework (paras 193-196).

Rating	Level of Harm to Asset
	Development of the site is likely to result in harmful impact to/on the significance/setting of a listed building (Grade I, II*, II); a scheduled monument; a registered park or garden (Grade I, II*, II); a conservation area; a non-designated heritage asset. It is unlikely that impacts can be mitigated.
	Development of the site may result in harmful impact to/on the significance/setting of a listed building (Grade I, II*, II); a scheduled monument; a registered park or garden (Grade I, II*, II); a conservation area; a non-designated heritage asset. It is likely that impacts can be avoided or mitigated.
	Development of the site is likely to result in minimal or no impact to/on the significance/setting of a listed building (Grade I, II*, II); a scheduled monument; a registered park or garden (Grade I, II*, II); a conservation area; a non-designated heritage asset. It is likely that no mitigation is required.

Step 2 - Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)

Those sites which have been rated green or amber for overall deliverability in the SHLAA will then be assessed in more detail. A Heritage Impact Assessment (HIA) pro-forma will be produced for each of these sites. This incorporates the significance of any asset(s) relating to the site and an assessment of harm to the asset(s) and their settings.

As the HEAN3 acknowledges, for a number of assets, it may be that a site makes very little or no contribution to significance. Alternatively, this work may conclude that additional assessment may be required due to the lack of existing information.

Step 3 - Assess the effects of the proposed development on the significance of the heritage asset and its setting

This stage looks to identify what impacts the development of a site might have on the significance of a heritage asset or its setting and evaluate the resultant degree of harm. The evaluation should extend to consideration of cumulative impacts on multiple assets, as and where appropriate.

HEAN3 states that due to the wide range of circumstances in which setting may be effected and the range of assets that may be involved, different approaches will be required for different circumstances. However, in general, any assessment should address the attributes of the proposed development that may affect setting in terms of:

- Location and siting (e.g. proximity to asset, position, topography, relationship and key views)
- Form and appearance (e.g. prominence, scale, massing, proportion, design and materials)
- Wider effects (e.g. noise, odour, lighting, changes to skyline, changes to land use, changes to general character of the site and cumulative impact)
- Secondary effects (e.g. increased traffic movements)

It may be that only a limited selection of the above will be important in terms of any particular development. However, such a checklist helps clarify the implications of the development on the significance of the heritage asset.

When assessing the potential impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation.

The level of harm needs to be established. This is categorised as ‘substantial’, ‘less than substantial’ or ‘no harm’ to the heritage asset. A definition of these categories is set out in the table below:

Assessment of Impact/Level of harm

Scale of Impact	Definition
Substantial	Considerable change affecting the special character of designated heritage assets including their setting, where the significance of those elements is substantially harmed or lost.
Less than Substantial	Change affecting the special character of designated heritage assets, where elements which contribute to their significance and their setting are harmed; or limited change to elements that contribute to the significance of assets and their setting, where harm is minimal.
No harm	No designated heritage assets affected.

Where a proposed development would lead to substantial harm to, or total loss of a designated heritage asset, consent should be refused. Where a development proposal would lead to less than substantial harm to the significance of a heritage asset, the harm should be weighed against the public benefits of the proposal.

In some cases, it is possible that the cumulative impact on a number of heritage assets will have a bearing on the overall assessment of a site.

Step 4 - Maximising enhancements and mitigating/avoiding harm

If the assessment work concludes that there will be harm to the significance of an asset, consideration will be given as to how development could maximise the enhancement of the asset or show how the harm could be mitigated or avoided. In respect of mitigation, this could include a reduction in density or enhanced design requirements. Such mitigation will be high-level at the plan-making stage and would need to be informed by a detailed assessment submitted as part of any planning application.

Step 5 – Tests of Soundness Check

Confirmation that the proposed site is positively prepared, justified, effective in terms of delivery and consistent with the NPPF.

Outcome of site assessments

The result of applying this methodology may justify a revision to the overall deliverability of specific sites in the SHLAA due to the significant degree of harm to heritage assets that have been identified.

As a consequence, development of sites that would cause substantial harm to any heritage asset will not be considered for identification as a reserve housing site through the SAP. Development of sites identified as causing less than substantial harm to any heritage asset may still be considered to be suitable as a reserve housing site, but on the basis that further assessment and potential mitigation will be required in order to address the impact on the heritage assets, through the planning application process.