Land Off Rampton Road, Cottenham
Built Heritage Statement

Gladman Developments Ltd.

February 2017
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1.0 Introduction

Background

1.1.1. This report has been prepared by WYG on behalf of Gladman Developments to assess the potential heritage impacts of a proposal to develop land south of the Rampton Road on heritage assets within Cottenham Village.

1.1.2. The proposals are for the development of up to 200 residential dwellings (including up to 40% affordable housing) and up to 70 apartments with care (C2), the demolition of no.117 Rampton Road, introduction of structural planting and landscaping, informal public open space and children’s play area, surface water flood mitigation and attenuation, vehicular access points from Rampton Road and associated ancillary works. All matters reserved with the exception of the main site accesses.

1.1.3. Improvements to the roundabout at the Rampton and Oakingham Road junction are also proposed, (see Ashley Helme plan on Plate 10).

1.1.4. By virtue of paragraph 128 of the National Planning Policy Framework, applicants are required to describe the significance of any heritage assets which may be affected by a proposed development, including any contribution made to their setting.

1.1.5. This report fulfils these information requirements by providing an assessment of the built heritage assets which are located in the vicinity of the site.

1.1.6. In line with the above the following Heritage Assets have been identified and will be assessed within this report:

- The Cottenham Conservation Area
- Church of Allsaints, Grade I
- Tower Mill, Grade II listed
- Charity Alms-houses, Grade II listed.
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2.0 Legislation and National Planning Policy and Guidance

Overview of the decision-making process

2.1.1. The decision-making process of planning applications is within the role of the Local Planning Authority (LPA), and in certain cases the Secretary of State, which will have consideration of relevant legislation and planning policy at both national and local level. As such, this section will examine the relevant built heritage legislation and planning policies and guidance, in relation to the Site. A comprehensive assessment of these are outlined in Appendix C.

2.1.2. The current regime recognises that planning applications should consider the potential impact of development proposals upon ‘heritage assets’. This term includes: designated heritage assets, which have a statutory designation (e.g. Listed Buildings and Conservation Areas); and non-designated heritage assets, typically compiled into a Local List by LPAs.

Legislation


2.2.2. Section 16 of the 1990 Act states that, in considering whether to grant listed building consent for any works the LPA shall have special regard to the desirability of preserving the Listed Building, or its setting, or any features of special architectural or historic interest, which it possesses.

National Planning Policy Framework

2.3.1. In Section 7 Requiring good design, NPPF Paragraph 58 states that local planning policies should aim to ensure that development proposals: function well respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.

2.3.2. Paragraphs 126-141 of the National Planning Policy Framework (the NPPF) relate to the conservation of the historic environment. These paragraphs set out an approach for decision-making, taking into account the harm to a heritage asset’s significance, the extent of such harm, and, in the case of designated heritage assets, the need to weigh harm against public benefit. NPPF Paragraph 128 outlines the requirement for applicants to proportionately describe the significance of an identified heritage asset, including any contribution made by
their setting, to understand the potential impact that development proposals will have upon that significance.

2.3.3. The NPPF therefore requires a thorough assessment of any impact that proposals may have upon the significance and setting, which needs to be proportionate to both the heritage asset’s significance, and the degree to which the proposals will enhance or detract from that significance and the ability to appreciate it.

2.3.4. The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal decision relating to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA civ 137. The Court agreed with the High Court’s judgment that Parliament’s intention in enacting Section 66(1) was that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings.

2.3.5. The Court of Appeal Judgment of Mordue v South Northamptonshire Council [2015] EWBC 539 in examining the compliance of the approach for decision-making set out in the NPPF with the requirements set out in the 1990 Act, found that:

“a decision-maker who works through those paragraphs [NPPF Paragraphs 131-134] in accordance with their terms will have complied with the Section 66(1) duty”.

2.3.6. Thus, the approach set out in the NPPF for assessment and decision-making relating to heritage assets complies with the special regard for the desirability of preserving a statutorily listed building or its setting.

Local Planning Policies and Guidance

2.4.1. The Local Development Framework (LDF), adopted in July 2007 for South Cambridgeshire replaced the existing Local Plan which was originally adopted in February 2004. The LDF contains the following policy pertinent to this report.

2.4.2. POLICY CH/1 Historic Landscapes. Planning permission will not be granted for development which would adversely affect or lead to the loss of important areas and features of the historic landscape whether or not they are statutorily protected.

2.4.3. POLICY CH/4 Development within the Curtilage or Setting of a Listed Building. Planning permission will not be granted for development which would adversely affect the curtilage or wider setting of a Listed Building. Proposals must provide clear illustrative and technical
material to allow that impact to be properly assessed.

2.4.4. **POLICY CH/5 Conservation Areas.** Planning applications for development proposals (including applications for Conservation Area Consent for demolitions) in or affecting Conservation Areas will be determined in accordance with legislative provisions and national policy (currently in PPG15) and guidance contained in specific Conservation Area Appraisals (where they exist) and the District Design Guide.

2.4.5. Following the adoption of the LDF in 2007, the following supplementary planning policy was adopted, expanding on district-wide policies in the Development Control Policies Development Plan Document:

**Listed Buildings: Works to, or affecting the setting of (SPD Adopted July 2009)**

2.4.6. **CHAPTER FOUR.** Decisions on Planning and Listed Building Consent applications need to consider their impact on the setting of Listed Buildings. The land and structures contained within the curtilage are likely to be an important part of that setting. For example, a principal building, and its grounds and ancillary structures, may all be part of an integrated design.

2.4.7. The setting can, however, extend much further than the curtilage and may often include land some distance from it. It includes landscapes, street scenes and layouts that are part of a building’s context, and views to and from the Listed Building.

2.4.8. The setting may encompass a number of other properties. The setting of individual Listed Buildings very often owes its character to the harmony produced by a particular grouping of buildings (not necessarily all of great individual merit) and to the quality of the spaces created between them.

2.4.9. Where a Listed Building forms an important visual element in a street, consideration should be given to any development within the setting of the building. A proposed high or bulky building might also affect the setting of a Listed Building some distance away, or alter views of a historic skyline. In some cases, setting can only be defined by a historical assessment of a building’s surroundings.

2.4.10. There is a presumption that the Council will resist any application that:

- Would dominate the Listed Building or its curtilage buildings in scale, form, massing or appearance,
- Would damage the context, attractiveness or viability of a Listed Building,
• Would harm the visual, character or morphological relationship between the building and its formal or natural landscape surroundings, or built surroundings,

• Would damage archaeological remains (above or below ground) of importance unless some exceptional, overriding need can be demonstrated, in which case conditions may be applied to protect and preserve particular features or aspects of the archaeology

• Would impact adversely on a Conservation Area

2.4.11. A new Local Plan, which is to set out policies and land allocations that will guide the future of South Cambridgeshire up to 2031 was submitted to the Secretary of State in March 2014.

2.4.12. The policy on Heritage Assets submitted to the Secretary of State is as follows (Proposed Submission Local Plan (July 2013)):

2.4.13. **Policy NH/14: Heritage Assets**

1. Development proposals will be supported when:

   a. They sustain and enhance the special character and distinctiveness of the district’s historic environment including its villages and countryside and its building traditions and details;

   b. They create new high quality environments with a strong sense of place by responding to local heritage character including in innovatory ways.

2. Development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, particularly:

   c. Designated heritage assets, i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens;

   d. Undesignated heritage assets which are identified in conservation area appraisals, through the development process and through further supplementary planning documents;

   e. The wider historic landscape of South Cambridgeshire including landscape and settlement patterns;

   f. Designed and other landscapes including historic parks and gardens, churchyards, village greens and public parks;
g. Historic places;

h. Archaeological remains of all periods from the earliest human habitation to modern times.

Neighbourhood Plan

2.4.1. A neighbourhood plan area for Cottenham was designated in November 2015. The community have undertaken a number of informal consultation exercises however a draft version of the neighbourhood plan is yet to be produced.
### 3.0 Site Assessment

3.1.1 The site is situated between the Rampton and Oakington Roads on the south-west fringe of Cottenham, forming 14.16 hectares of land. The majority of the site forms part of a larger arable field running the length of Rampton Road, and is coupled to a smaller field closest to the Oakington Road.

3.1.2 The site is separated from the Rampton Road by a linear development of private residences built largely from the mid to late 20th century. Most of these houses have long gardens with mature vegetation bordering the field. To the south-east extent of the site, the bordering gardens also incorporate garden allotments which are surrounded by mature coniferous hedgerows.

3.1.3 A Grade II listed converted windmill, now water tower, is situated to the north-east 190 metres from the site. The Alms-houses, which are Grade II listed, lie further south-east beyond 1970s cul-de-Sac development to the site’s eastern boundary at a distance of over 300 metres.

3.1.4 Over 1.7 km to the north-east the Grade I listed All Saints Church is located. The spire of the church can be seen in distant views from the site.

3.1.5 The church is located within Cottenham Conservation Area which at its closest point is 500 metres from the site. The boundary of the conservation area broadly reflects the historic core of the village.

3.1.6 Land to the south of the site forms open countryside of large fields mainly used for arable crops. Occasional grouped agricultural sheds and other buildings exist. There is some vegetation cover from mature hedgerows and trees but this is reasonably sporadic likely owing to modern intensive farming methods.
4.0 Heritage Assets

Listed Buildings

4.1.1 There are no listed buildings within the study site but there are two Grade II listed buildings within the immediate vicinity. Tower Mill, a Grade II listed building lies north-east to the site and at its closest distance is approximately 160 metres away. The Alms-houses, Grade II listed, lie south-east of the site and at their closest distance are approximately 300 metres away. To the north west over 1.8 km away is the Grade I listed All Saints Church.

4.1.2 Tower Mill, Rampton Road, Cottenham, South Cambridgeshire

List Entry Number: 1164084

Grade: II Listed: 14th September 1984


4.1.3 Moretons Charity Alms-houses, Cottenham, South Cambridgeshire

List Entry Number: 1127333

Grade: II Listed: 14th September 1984

Almshouses, dated 1853 on stone panel to front wall. Gault brick with red brick door and window arches and terracotta band. Embattled hipped roof of fishscale pattern slate to centre, with lower flanking wings with end parapets on kneelers. Moulded brick eaves cornice and five end and ridge stacks with projecting capping, string courses and splayed offsets to bases. Plan of higher centre block with flanking wings. Two storeys with frieze of terracotta between. Centre block has canted front and alternating red and yellow bricks to pointed two centred arches to two-light casement with Y glazing bars. Similar arch to boarded door with cover strips. Wings have dripmoulds with return stops to three casements in square heads, the centre window is blind. At ground floor two similar window flanks two adjacent doorways. The wing to the left hand has six window openings, with two blind windows.

4.1.4 Church of All Saints, Cottenham, South Cambridgeshire

List entry Number: 1127339
Grade: I
Date first listed: Aug-1962

Parish church, of C13 origins but mostly rebuilt in C15 and the upper stages of the West tower are 1617. Restored C19 and C20. The early C13 parts of the church including the lower stages of the West tower and the chancel arch are of limestone ashlar, but the C15 part of the church is of sandstone rubble and the 1617 upper stages of the West tower are of pink brick. Embattled mansard roofs, C19, leaded, to nave, chancel and North and South porches. Plan of West tower, nave with North and South aisles, North and South Porches and chancel. West tower, C13 with the two upper stages rebuilt in 1617. Four stages, on splayed plinth. Embattled parapet with four corner bulbous ogee finials of 1617. West doorway, C13 of two hollow moulded orders in two centred arch with label. West window of four lights with intersecting tracery (restored) in two centred arch. The bell chamber openings have C13 intersecting tracery in the heads, and were probably reset c.1617. There is a sundial on the South West buttress, and the clock was rebuilt and restored c.1980. The stair turret is in the North East angle. Nave, C15 rebuilt on site of C13 church. Embattled parapet, with moulded main cornice and beast gargoyles above clerestory of five windows, each of two cinquefoil lights with vertical tracery. The South aisle and porch is contemporary with the nave and has similar but larger fenestration. The chancel is also C15, but the fenestration is restored. Interior: The nave is in five bays. Two centred arches of two hollow moulded orders on octagonal columns with moulded capitals and bases. Continuous moulded label with mask stops above the nave arcades. The chancel arch is early C13 double chamfered but the responds are C15, half round with half octagonal capitals. C15 piscina and three seat sedilia in four bays, each with four centred foiled arch on columns with engaged shafts, in square heads with frieze of quatrefoils above. Wall monument, North wall of chancel! Mrs Alice Rogers and son Richard Dacres, White marble cartouche with drapery and cherubs heads beneath crest. Font, octagonal bowl on octagonal stem, C15.

Conservation Area

4.1.5 The study site does not lie in a Conservation Area. The site, at its closest distance to the Cottenham Conservation Area is approximately 500 metres away. The Cottenham Conservation Area runs primarily north-east to south-east along a largely linear route of the main High-street, the B1049 and further east at the centre of the village. Due to distance and intervening late twentieth century development the proposals are not considered to impact upon the special interest of the Conservation Area and therefore the Conservation Area has been scoped out of this report.
Scheduled Monuments

4.1.6 There are no Scheduled Monuments within the study site. In the wider vicinity, at a distance of approximately 0.9km north-west of the site lies Giants Hill, a partially moated mound of land which formed an unfinished castle dating from AD1143. This Scheduled Monument is enclosed in mature screening vegetation to the extent that there is no inter-visibility with the study site or Cottenham village. Giants Hill is therefore scoped out of this report for assessment.

Parks & Gardens of Special Historic Interest

4.1.7 There are no Parks & Gardens of Special Historic Interest within the study site or in its wider vicinity.
5.0 Pertinent planning background

5.1.1 An application (S/1818/15/OL) for up to 225 dwellings on the site was submitted in July 2015. The application was refused at committee in May 2016, with reasons for refusal relating to highways and landscape.

5.1.2 An appeal was submitted against the refusal of the application, and subsequently a second application for up to 200 dwellings on the same site (S/1411/16/OL) was submitted. Through the second application, the Applicant sought to address the reasons for refusal cited in respect of the original application. This included the proposal for junction improvement works to the roundabout at Oakington Road/Rampton Road.

5.1.3 While no objections were raised by the Council’s heritage officer in respect of either the original application or the second application, Members resolved to defer the determination of the second application at Planning Committee in February 2017, pending the receipt of information to confirm that the proposed roundabout works would not impact the setting of the grade II listed alms-houses.

5.1.4 It is notable that in the committee report in respect of the second application, the Case Officer states "the proposal is not considered to damage the setting of these listed buildings. Whilst it is noted that works are required to the roundabout adjacent to the Almshouses, this is not considered to be detrimental to the setting of the listed building given that it is already significantly impacted by the proximity of the road and traffic that cause noise and disturbance. The Water Tower is located a significant distance from the site. The proposal would therefore comply with Policy CH/4 of the LDF"
6.0 Heritage Site Assessment

6.1.1 This section will identify the significance of the surrounding heritage assets, determining what contribution their existing setting and the site makes to this significance. The assessment will be proportionate in accordance with paragraph 128 of the NPPF.

Alms-houses

6.1.2 The Grade II Moretons Charity Alms-houses, lie approximately 300 metres east of the site. Their significance resides in their high quality, considered appearance and illustrative historic value in demonstrating the practices concerning the care for the poor within the local community.

6.1.3 The Alms-Houses are presently located close to the road side. It is noted that Plate 12 illustrates the historic setting of the Alms-houses has always been that of a roadside junction. However twentieth century alterations such as the creation of a roundabout close by have altered the historic direct roadside setting, with a small green verge created alongside traffic signage, filtering views. It is noted that the Alms-houses are considered to be a local landmark. However their setting has been somewhat further compromised by the construction of a 1970’s housing development to the west.

6.1.4 The site is smaller than depicted in the SHLAA and appears a good distance from the asset, consequently there are only low levels of inter-visibility between them. Although the asset is considered as a local landmark, the building’s orientation limits its principal elevations from being directly appreciated from the site, whilst the 1970’s housing development acts as an additional settlement buffer, filtering views. As such in views from the site, the significance of the Alms-houses is presently appreciated within a semi suburban setting and the site itself makes only a neutral contribution to this significance. The development of the site will not alter this existing semi-suburban character.

6.1.5 Plate 10 shows the proposals include improvements to the existing roundabout to the north west of the Alms-houses. While these works are close to the site of the Grade II listed Alms-Houses, opportunities to improve the site lines towards the Alms-houses from the road exist in the potential consolidation of existing signage.
6.1.6 It is further acknowledged that late twentieth century road widening has altered the original form of the junction, creating a mini roundabout. The proposals will not therefore alter the existing modern character of the road junction. The proposals are considered therefore to pose a neutral impact upon the ability to appreciate the significance of the Alms-houses.

**Tower Mill**

6.1.7 Tower Mill is the closest heritage asset to the site over 190 metres to the east. Originally a windmill, it was later used as a water tower and has now been converted to residential use. It is considered locally as a landmark building, contributing to the character to the area and due to its height, visible at some distance from the surroundings.

6.1.8 The Tower, which is constructed of brick, has been capped with a cylindrical metal tank which does not hold much architectural or aesthetic value but does embody archaeological and evidential value, particularly illustrating the evolutionary change of use the building has undertaken.

6.1.9 An appreciation of the tower’s significance varies from a localised level when compared to its wider context. Prominent viewpoints of the tower exist on the northern side of Rampton Road, heading east towards Cottenham. This is due to a combination of private allotments and low level infill housing development which creates open viewing corridors towards the tower. In the near vicinity houses fronting Rampton Road and Lambs Lane have varying full or incomplete views of the tower, however it is noted viewpoints further away on the same streets are often obscured by housing and mature vegetation.

6.1.10 There are additional views of the tower from the footpath to the south of Rampton Road and from the driveway of adjacent properties. Some of these driveways stretch to the rear of the properties, occasionally framing the tower. In some instances garages attached to the main houses and some later housing infill has prevent such views.

6.1.11 The significance of the asset is therefore appreciated from within the site in the context of the existing semi-suburban development which extends from the centre of the village to the south and west. The development of the site will not alter this existing character.
All Saints Church

6.1.12 The tower is located to the north of the village within a small church yard. From within the site the long linear plan of Cottenham creates the illusion that the Spire commands a viewpoint with similarities in height and massing to Tower Mill, and is visible in distant views which take in glimpses of the surrounding village houses. Development when viewed from the south is reasonably consistent along the Rampton Road, masked to a degree by mature vegetation. As such the church tower is viewed within an existing semi-suburban context. The development of the site will not therefore alter this existing character.

6.1.13 Therefore it is considered that the proposals will pose no harm to the significance of the assets identified above and therefore there is no conflict with paragraphs 132-134 of the NPPF.
7.0 Conclusions

7.1.1 It is noted that previously the council has raised no objections to the scheme in relation to the impact on heritage assets.

7.1.2 The primary purpose of this assessment is to consider the impact of the development upon listed buildings within the vicinity of the site. This has included an assessment of what impact the widening of Rampton and Oakington Road roundabout (Plate 10) will have upon the significance of the nearby Alms-houses.

7.1.3 The proposed development on the study site is considered to cause no harm (in terms of the NPPF) on the settings of heritage assets identified in this report. Development proposals include mitigation in the form of public open spaces and a careful design and layout to ensure glimpses of the Grade II listed Tower Mill and Grade I listed All Saints church are retained.

7.1.4 While the creation of a roundabout at the junction of Oakingham and Rampton Roads is close to the site of the Grade II listed Alms-Houses, their historic setting has always been that of a roadside junction (Plate 12). Opportunities to improve the sight lines towards the Alms-houses exist in the potential consolidation of existing signage. It is further acknowledged that late twentieth century road widening has altered the original form of the junction, creating a mini roundabout. While the proposals will include additional road widening, this is not considered to alter the existing modern character of the road junction or vary the junction’s current contribution to the setting and significance of the Alms-houses. The proposals are therefore considered to pose a neutral impact upon the ability to appreciate the significance of the Alms-houses.

7.1.5 It is considered that the proposals will cause no harm to the significance of the heritage assets identified within this report. Therefore there is no heritage reason why this application should not be viewed favourably by the Council.
Appendices

Appendix A: Sources
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ENGLISH HERITAGE. National Heritage List for England (http://www.english-heritage.org.uk/professional/protection/process/national-heritage-list-for-england/)

SOUTH CAMBRIDGESHIRE, JULY 2007, Local Development Framework, Development Control Policies, Development Plan Document


SOUTH CAMBRIDGESHIRE 2013, Proposed Submission South Cambridgeshire Local Plan July 2013 Chapter 6 Protecting and Enhancing the Natural and Historic Environment

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Appendix B: Plates
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Plate 1: Tower Mill viewed from North footpath Rampton Road
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Plate 2: Tower Mill viewed from southern footpath and long driveway on Rampton Road
Plate 3: View from northern footpath Rampton Road, along driveway to site
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Plate 4: View of Tower Mill and site from Rampton Road, before entering Cottenham Village
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Plate 5: View of Tower Mill and site from Rampton Road, before entering Cottenham Village
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Plate 6: Cottenham viewed from South on Rampton Drift Bridleway, (Red Arrow Tower Mill and Black Arrow All Saints Church)
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Plate 7: Example of vegetation screening of Cottenham, viewed from north-east edge of Les Kings Wood
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Plate 8: Example of vegetation screening around Cottenham, looking from south from Loade Farm, (Red Arrow: Tower Mill)
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Plate 9: Site Plan, the Red line indicates the site boundary, the blue line the site ownership.
Plate 10: Proposed junction improvements at the Oakenham and Rampton Road junction.
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Plate 11: Identification of Listed buildings. Source: Historic England. Listed buildings are indicated by the blue triangle. Listed buildings included for assessment are indicated by the green circles. Please note red highlight indicates a scheduled ancient monument, not the site boundary.
Plate 12: OS Map 1887.
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Plate 13: Cottenham Conservation Area Boundary.
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Appendix C: Legislation and Planning Policy and Guidance
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Legislation

*Planning (Listed Buildings and Conservation Areas) Act 1990*

General duty as respects listed buildings in exercise of planning functions.

Section 66(1) 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 or any features of special architectural or historic interest which it possesses.

National Planning Policy

*National Planning Practice Framework (NPPF) (DCLG, March 2012)*

The National Planning Policy Framework (NPPF), published 27 March 2012, sets out the Government’s planning policies for England and how these are expected to be applied.

When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the ‘golden thread’ which is expected to run through the plan-making and decision-taking activities. However, it should be noted that this is expected to apply except where this conflicts with other policies contained within the NPPF, inclusive of those covering the protection of designated heritage assets, as set out in paragraph 14 of the NPPF.

Section 7 *Requiring good design* (NPPF Paragraphs 56-68), reinforces the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in NPPF Paragraph 58, the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, by reflecting the built identity of the surrounding area.

Section 12 *Conserving and Enhancing the Historic Environment* (NPPF Paragraphs 126-141), relates to developments that have an effect upon the historic environment. This is the guidance to which local authorities need to refer when setting out a strategy in their Local Plans for the conservation and enjoyment of the historic environment. This should be a positive strategy and should include heritage assets which are most at risk through neglect, decay, or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance. For clarification, the NPPF provides definitions of terms relating to the historic environment. For the purposes of this report, the following are important to note:
**Heritage Asset** is a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions. These include designated heritage assets and assets identified by the local planning authority; and

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

The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment, and when determining planning applications:

- The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;
- the wider social, cultural, economic, and environmental benefits that the conservation of the historic environment can bring;
- the desirability of new development in making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

NPPF Paragraph 128 states that LPAs, when determining applications for development, should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

According to NPPF Paragraph 129, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

NPPF Paragraphs 132-136 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 132 emphasises that when a new development is proposed, great weight should be given to the asset’s conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.

NPPF Paragraph 134 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
The NPPF, therefore, continues the philosophy of that was upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative, and sustainable approaches to managing change. English Heritage characterised this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as:

“a positive and collaborative approach to conservation that focuses on actively managing change…. the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment”

(Constructive Conservation in Practice, English Heritage, 2009).

**National Guidance**

*Planning Practice Guidance (PPG) (DCLG, March 2014)*

This guidance has been adopted in support of the NPPF. It reiterates the importance of conserving heritage assets in a manner appropriate to their significance as a core planning principle.

It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach.

Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in an active use that is consistent with their conservation.

Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset’s special architectural or historic interest. Adding, ‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as ‘the surroundings in which an asset is experienced, and may be more extensive than the curtilage’. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

The guidance states that if ‘complete or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset’s significance, and make the interpretation publicly
available.’

**Conservation Principles, Policies, and Guidance (English Heritage, April 2008)**

Outlining Historic England’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPS5, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. Guidance within the document describes a range of ‘heritage values’ that constitute a heritage asset’s significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that ‘considered change offers the potential to enhance and add value to places…it is the means by which each generation aspires to enrich the historic environment’ (Paragraph 25).

**Seeing the History in the View (Historic England, April 2015)**

This document presents a method for understanding and assessing the significance within views. The method can be applied to any view that is significant in terms of its heritage values. Such views may be selected by a developer, or LPA (perhaps in consultation with Historic England), as part of the Environmental Impact Assessment (EIA) of specific development proposals.

The method has been designed to provide a consistent and positive approach to managing change. This approach has been tested and refined through a number of worked examples.

The guidance is designed to be used as part of the suite of other assessment and characterisation tools whose function is to help understand the contribution made by setting to the significance of a heritage asset.

This document is currently in the process of revision to comply with the NPPF and other Government initiatives, as well as to incorporate new information and advice based on recent case law and Public Inquiry decisions.

**Overview: Historic Environment Good Practice Advice in Planning**

In March 2015, Historic England withdrew the PPS5 Practice Guide document and replaced with three Historic Environment Good Practice Advice in Planning Notes (GPAs).

These GPAs provide supporting guidance relating to good conservation practice. The documents
particularly focus on how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

**GPA1: The Historic Environment in Local Plans (March 2015)**

This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance).

This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, which will afford appropriate protection for the heritage asset(s) and make a positive contribution to local character and distinctiveness.

Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to ‘inform the nature of allocations so development responds and reflects local character’.

Further information is given relating to cumulative impact, Section 106 agreements, stating ‘to support the delivery of the Plan’s heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.’ It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) in line with paragraph 153 of the NPPF can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

**GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)**

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that ‘application proposals that affect the historic environment are much more likely to gain the necessary permissions and create
successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.’

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change, or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.


This document assesses the potential impact of development proposals upon the setting and significance of the heritage assets identified.

**Step 1: Identification of built heritage assets and their settings**

A search of the Historic Environment Record (HER), together with the National Heritage List for England (NHLE) and the Council’s Website provides an initial list of potential heritage assets to be considered,
including listed buildings, conservation areas, and other national or local heritage designations which may need to be considered. This is augmented with a site visit and additional research, where other buildings and structures not included in any of the above, but potentially considered as non-designated heritage assets, can be identified. Each heritage asset is visited, as far as public access allows, and its surroundings are examined to understand the degree to which elements of the surroundings allow for the building to be experienced or better understood, therefore identifying its setting, as defined within the NPPF.

Step 2: Assess whether, how and to what degree that these settings make a contribution to a heritage asset’s significance

To undertake this stage, the significance of the heritage assets must be understood, whether designated or non-designated. Although there is no proscriptive method for assessing significance, this Appraisal utilises the heritage values set out in Conservation Principles, Policies, and Guidance (English Heritage, 2008), and considers each heritage asset against these values. Whilst the British Standard suggests a variety of additional potential values, the ones set out by in Conservation Principles are generally recognised as appropriate and proportionate values to assess. Once each heritage asset has been assessed against the five heritage values, and its significance is understood, an assessment of the contribution of setting to this significance can be undertaken. This is achieved through assessing each element of setting against the heritage values of the asset, and identifying whether it a positive, negative or neutral contribution, if any—and if so, identifying which heritage values it contributes to and how. The final stage is to identify the relative extent of significance arising from setting, in comparison to other sources of heritage value.

Step 3: Assess the effect of the proposed development on the heritage asset’s significance

GPA 3 sets out suggested, although non-exhaustive, potential attributes of a development which may affect the setting of heritage assets, which include location and siting of the development; the form and appearance of the development; other effects such as planting, lighting, noise, change to general character, and changes to skylines or built surroundings and spaces; permanence of the development; and longer term or consequential effects of the development. These are used as a guide and a basis from which to assess how a development may alter a particular element of setting, and to understand which heritage values the proposed development may impact upon. Details of the design of the proposed development will often vary, and will range from initial concepts through to detailed plans and elevations, verified photographs and photomontages. Where details are lacking, assumptions based on professional judgement and knowledge can be used to undertake assessment—where this is the case, this will be set out clearly in the report, and caveated accordingly. Where harm is identified to the significance of a designated heritage asset, the nature of harm is explained, and the extent of harm to significance is set
out in terms of substantial harm, or in degrees of less than substantial harm, as appropriate. Where harm is identified to the significance of a non-designated heritage asset, the nature of harm is set out in terms of high, moderate, low or negligible. This is in recognition that the NPPF differentiates the extent of weight to be afforded to the conservation of a heritage asset, dependant on its status of designation. Where benefit is identified, this is identified in terms of substantial, moderate, low or negligible, for the purpose of clarity.

Step 4: Maximising enhancement and minimising harm upon the heritage asset’s significance

Although this Step generally relates to identification and assessment of potential impact during design, and the subsequent mitigating harm through re-design, for the purposes of this assessment, this Step will be used to identify areas of where there is heritage benefit within the scheme, and/or elements of mitigation integral to the design (for instance, landscaping, or repairs to a listed building). In order to be able to undertake a quantitative balancing exercise between heritage benefit and heritage harm in the next Step, benefit is referred to in terms of substantial, moderate, low or negligible.

Step 5: Making and documenting the decision and monitoring the outcomes

As this final stage is explicitly for the decision-maker, this Step is not undertaken within this assessment. However, as any decision will be based on the compliance of the proposed scheme with legislation and policy at both national and local level, this Step is used to assess whether the scheme is in line with the requirements stemming from such. A synopsis of the identified impacts on each heritage asset is provided, followed by an assessment of cumulative harm on the surrounding historic built environment. Where both heritage harm and heritage benefits are identified, a balancing exercise of these is undertaken. Finally, the assessment will identify whether the proposed scheme is compliant with relevant legislation and policy, and whether any additional balancing of harm against public benefit is required. This final Step will take account of all relevant and up-to-date case-law as it pertains to the scheme, as well as the planning history of the site where relevant, including (but not exclusively) any previous applications, appeals, together with any formal or informal pre-application advice from both the Local Planning Authority and from Historic England.

The appendices contain background information and reference material, including list descriptions, and all relevant paragraphs of legislation and relevant policies. This should all be referred to throughout these five Steps.

Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation, and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.
**Overview: Historic England Advice Notes in Planning**

In addition to the above documentation, Historic England has published three core Heritage Advice Notes in Planning (HEAs) that provide detailed and practical advice on how national policy and guidance is implemented.

**HEA 1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2016)**

This document forms revised guidance which sets out the ways to manage change to ensure that historic areas are conserved. In particular, information is provided relating to conservation area designation, appraisal and management. Whilst this document emphasises that ‘activities to conserve or invest need to be proportionate to the significance of the heritage assets affected,’ it reiterates that the work carried out needs to provide sufficient information to understand the issues outlined in NPPF Paragraph 192, relating to the assessment of any heritage assets that may be affected by proposals.

There are different types of special architectural and historic interest that contribute to a Conservation Area’s significance. These include:

- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
- those linked to a particular industry or individual with a particular local interest;
- where an earlier, historically significant, layout is visible in the modern street pattern;
- where a particular style of architecture or traditional building materials predominate; and
- areas designated on account of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England’s Register of Parks and Gardens of special historic interest.

Change is inevitable; however, this document provides guidance in respect of managing change in a way that conserves and enhances areas, through identifying potential within a conservation area. This can be achieved through historic characterisation studies, production of neighbourhood plans, confirmation of special interest and setting out of recommendations.

NPPF Paragraph 127 states that ‘when considering the designation of conservation areas, local planning
authorities should ensure that an area justifies such status because of its special architectural or historic interest,’ this document reiterates that this needs to be considered throughout this process.

Section 71 of the 1990 Act places on LPAs the duty to produce proposals for the preservation and enhancement of Conservation Areas. This document provides guidance for the production of management plans, which can ‘channel development pressure to conserve the special quality of the conservation area’. These plans may provide polices on the protection of views, criteria for demolition, alterations and extensions, urban design strategy and development opportunities. Furthermore, it includes information relating to Article 4 Directions, which give the LPA the power to limit permitted development rights where it is deemed necessary to protect local amenity or the well-being of an area.